



Babergh and Mid Suffolk Joint Local Plan Examination

Matter 4 Hearing Statements

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MATTER 4: SETTLEMENT HIERARCHY, SPATIAL DISTRIBUTION OF HOUSING AND HOUSING SITE SELECTION PROCESS

Q1 Has the settlement hierarchy set out in Tables 2 and 3 been derived using a robust and objective process?

1.1.1 Yes, Gladman consider that the settlement hierarchy has been derived using a robust and objective process. Notwithstanding this, it is considered that a strategy which recognises that residents of Hinterland Villages rely upon larger Core Villages for their day-to-day needs would be more appropriate. Therefore, it may be prudent to employ an approach where larger Core Villages are able to accommodate development needs of the 'Functional Clusters' they serve which would reflect a sustainable approach to development where the most sustainable location support development for the lower tier settlements.

1.1.2 Indeed, this was an approach taken within the Babergh Core Strategy where the Executive Summary states,

"The Core Strategy and Policies document uses a new approach by identifying 'functional clusters' for the rural areas and all of the district's rural tracts are assigned to one or more of these clusters (as some areas overlap). The 'functional clusters' are groups of villages which share common links between them. The larger villages (called Core Villages) provide services and facilities for their own residents and for those that live in smaller villages and rural settlements in a hinterland around them (often overlapping). The villages in catchment areas of these Core Villages we have called Hinterland Villages. The clusters have been identified through local responses to the Growth Review, rather than being identified by the Council. These clusters reflect the way that people may live in one part of the cluster but use other places within it for essential, low-order, everyday services and facilities (such as schools, convenience shops or primary healthcare). One of the most important benefits of the functional clusters approach is that it allows for inter-changeability in service provision, the location of new development (such as how or where rural affordable housing developments are provided and occupation rights shared, where new employment provision is made or recreational facilities provided for a general area)."

Q2 Is it sufficiently clear how policy SP03(1) would be applied to (a) development on sites allocated in the plan (b) applications for development not on sites allocated in the plan?

1.1.3 Gladman do not wish to comment on this question.

Q3 Is the requirement to demonstrate “exceptional circumstances” for development outside of defined settlement boundaries in isolated locations consistent with NPPF paragraphs 79 and 83?

1.1.4 Gladman do not consider that Criterion 3 of Policy SP03 is not consistent with guidance set out in the NPPF, while the application of settlement boundaries within the Plan is inconsistent.

1.1.5 Firstly, paragraph 79 highlights that planning policies should avoid the development of isolated homes in the countryside unless a number of circumstances apply this provides flexibility in the application of rural housing and does not require exceptional circumstances to be justified.

1.1.6 It is not clear what constitutes development in isolated locations in the frame of Policy SP03 and whether sites outside, but immediately adjacent settlement boundaries will be located within open countryside and have to demonstrate ‘exceptional circumstances’.

1.1.7 It is proposed that such an application of Policy SP03 would not be the most appropriate tool if these preclude otherwise sustainable developments from coming forward to bolster the supply of housing. Indeed, The Framework is clear that sustainable development should proceed without delay in accordance with the presumption in favour of sustainable development. The use of settlement limits is likely to arbitrarily restrict such development from coming forward and this does not accord with the positive approach to growth required.

1.1.8 In addition, the Council are placing a reliance on neighbourhood plan areas identifying development sites to help achieve the local plan housing requirement, yet there is no duty or timescales that can be relied on for Neighbourhood Plans to be

produced. This approach, alongside the application of settlement boundaries in Policy SP03 may lead to lower levels of growth being delivered in these settlements than is required.

1.1.9 Finally, there is an inconsistency with the application of settlement boundaries, it is noted in the policy wording that new allocations are included within the defined settlement boundaries, however, reference is not given to sites with planning permission in all cases. Further inconsistencies exist in the application of this wording, as numerous sites that are not allocations within the Plan are included with defined settlement boundaries, while other sites with planning permission are excluded.

1.1.10 Principally Gladman's concerns relate to 'Land to The South Of, Gipping Road, Stowupland' (DC/20/01435). This site was granted Outline Planning Permission on 10th October 2020 yet is not included within the defined settlement boundary for Stowupland and nor is it proposed to be allocated in this plan; despite is being identified as under Policy LA079 Allocation in the Babergh & Mid Suffolk Joint Local Plan Preferred Options (July 2019).

1.1.11 Gladman contend that the settlement boundaries should be amended to provide consistency and approach new allocations and planning permissions in the same manner given that both sources will contribute to the development needs of the Plan.

Q4 Are the criteria of policy SP03(4a-c) of relevance to the Settlement Hierarchy and do these relate to issues covered by other policies of the plan?

1.1.12 Gladman do not wish to comment on this question.

Q5 Is there sufficient clarity as to whether policy SP03(4d) concerns the cumulative impact of the various effects of an individual development proposal or the cumulative impact of more than one development proposal?

1.1.13 Gladman do not wish to comment on this question.

Q6 Is the proposed distribution of development set out in policy SP04, based on robust and objective evidence and is it justified and consistent with national policy? Does the

distribution appropriately reflect the Ipswich Strategic Planning Area-wide growth objectives?

1.1.14 The Plan seeks to balance housing growth between strategic transport corridors, including the A14 alongside ensuring that other market towns and rural communities benefit from appropriate levels of growth. Gladman support this sustainable approach within Mid Suffolk which has the largest capacity for growth given the good road connections provided by the A14 and rail connections at Thurston, Stowmarket, Elmswell and Needham Market. Additionally, Stowupland benefits from close connections to the A14 and Stowmarket station.

1.1.15 Nonetheless, it is considered that the Council should have allocated further growth to Stowmarket where many of the proposed allocations were previously allocated in the Stowmarket Area Action Plan (2013). This is effectively a continuation of strategies, and those sites are not helping to deliver sustainable growth to meet identified needs at the Council's most sustainable settlement.

Q7 Is it sufficiently clear how the numbers and percentages of new homes, by settlement hierarchy categories, set out in policy SP04 will be applied in the determination of planning applications for housing development?

1.1.16 Although Policy SP04 highlights that all the identified housing numbers are minimum figures, therefore implying that additional development may come forward providing that they align with plan policies, it would be prudent to make this explicit within the policy wording.

1.1.17 Notwithstanding the flexibility in regard to setting 'minimum' housing targets, the use of policies which require all development beyond the limits of settlement boundaries to demonstrate exceptional circumstances in order to achieve permission does not align.

Q8 Are the “Total homes required” figures for Neighbourhood Plan Areas, detailed in Table 4, a sum of the outstanding planning permissions (as of 1/4/18) and the sites allocated for housing in the plan in each Neighbourhood Plan Area? If so:

(a) are all outstanding permissions from after 1/4/18 identified as housing allocations in the plan or do they need to be otherwise accounted for?

(b) is it sufficiently clear as to how and when the requirement to identify the indicated total number of homes required in each Neighbourhood Plan (NP) Area will operate in practice; in particular:

(i) in respect of outstanding permissions in NP areas which expire (both those pre- and post-dating 1/4/18)?

(ii) in respect of housing sites allocated in the plan in NP areas for which planning applications do not come forward?

(iii) is not flexibility to reflect existing permissions/housing allocations which do not come forward already accounted for in the approximate 20% buffer of housing provision over the housing need targets?

1.1.18 Gladman does not agree with the approach taken in ‘Table 04 – Minimum housing requirement for NP Areas’. Gladman recognises that the councils have specified that the numbers are identified are ‘minimums’ however, many of these are identified commitments and do not recognise that there are sustainable development opportunities at the settlements identified and nor the fact that all the settlements/parishes are at different stages of producing neighbourhood plans.

1.1.19 For example, Glemsford in Babergh is identified as requiring 37 dwellings over the plan period but these already have planning permissions as of 01/04/2018. Glemsford is a Core Village with a good range of services, similar to that of Long Melford which it is near which is identified as needing a minimum of 367 dwellings over the same period. Glemsford as noted on the Council’s website was an area designated for

neighbourhood planning in 2017 but no further documentation appears to have been published.

- 1.1.20 The councils cannot rely upon neighbourhood plan areas to allocate housing at these identified areas. Strategic policies should identify the opportunities such as those at Glemsford and other neighbourhood plan area. Neighbourhood plans that then may be published subsequently should support the strategic policies identified by the council.
- 1.1.21 Settlement boundaries are restricting sustainable growth at locations identified in Table 04. A consistent approach hasn't been taken in the document and it has not been justified.
- 1.1.22 Glemsford and Long Melford are noted above as examples however, this consideration applies throughout both Babergh and Mid Suffolk.

Q9 The Councils have stated that "the settlement hierarchy and the distribution of development between settlement categories have not been of particular significance in the selection of housing sites, to the extent that they might be overriding of other factors" (paragraph 4.01 of Doc G01). In view of this is it justified and effective to require existing permissions/housing allocation sites which are not implemented to be offset by other sites within the same Neighbourhood Plan Area?

- 1.1.23 Gladman do not believe that this would be an effective or justified approach to ensuring a supply of housing across the whole plan period. A more flexible and responsive approach would be to avoid blanket policies which arbitrarily restrict the delivery of sustainable growth opportunities such as restrictive settlement boundary policies.

Q10 Have the housing sites allocated in the plan been selected against possible alternatives using a robust and objective process? [Note: the soundness of specific housing allocation sites and their relevant policy criteria will be considered as part of

Matter 9 and this question focusses on the overall approach by which the sites were appraised and selected.]

1.1.24 In general, Gladman consider that the housing site allocations have been selected using a robust and objective process. Notwithstanding this, there is a need for further consistency within the Plan and site allocations, whereby sites which have achieved planning permission should be included with settlement boundary limits and allocated within the Plan particularly in relation to Land at Woodward Avenue, Bacton and Land south of Gipping Road, Stowupland which were considered an appropriate location for development and identified as proposed allocations within previous iterations of the Local Plan.