

Babergh and Mid Suffolk Joint Local Plan Examination Hearing Statement

Matter 4 – Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process

Prepared on behalf of John Miles & Sons (Respondent ID 4493)

June 2021

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1.0 Introduction

- 1.1 This Hearing Statement in respect of Matter 1 of the Babergh and Mid Suffolk Joint Local Plan (JLP) Examination is submitted by Strutt & Parker on behalf of John Miles & Sons (respondent ID 4493) (“JMS”).
- 1.2 JMS are promoting the development of Land south of Ashfield Road, Norton (“the Site”) (site reference SS0472 in the Council’s plan-making process) for residential development.
- 1.3 The Site is not proposed to be allocated through the submitted version of the JLP.
- 1.4 We consider that the JLP in its current form is unsound. Our principal concern the lack of growth proposed for smaller settlement in the Districts, which we consider risks harming the vitality of these rural communities. In addition, we consider there have been flaws in the site selection process which have resulted in sites (such as the Site), which have the potential to support the vitality of rural communities by providing proportionate growth, being unjustifiably rejected. We consider that current defects in the submitted JLP can be readily addressed through main modifications, and that the submitted JLP can be made sound.
- 1.5 This Hearing Statement concerns Matter 4 (Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process); and, specifically, addresses Issue/Questions 4.1 and 4.6.

2.0 Response to Matter 4, Issue / Question 4.1

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

- 2.1 We raised concerns within the accompanied Regulation 19 submissions over the proposed settlement hierarchy as governed by draft Policy SP03, and illustrated in Tables 2 and 3 of the JLP.
- 2.2 The settlement hierarchy, and the proposed categorisation of settlements into the varying categories of settlement i.e. Ipswich Fringe, Market Towns and Urban Areas, Core Villages, Hinterland Villages and Hamlet Villages has been informed by an indicative sustainability score derived from the Settlement Hierarchy Review (November 2020), which forms part of the Local Plan evidence base.
- 2.3 Paragraph 08.03 of the JLP a weighted scoring system has been used to assess sustainability of settlements. The methodology scores each settlement against a list of sustainability criteria e.g. proximity to services and public transport, with each criteria scoring 1-3 on a sliding scale of sustainable to least sustainable. Depending on the total cumulative score, the methodology assigns each settlement to a category in the settlement hierarchy, with Core Village settlements scoring the highest and Hamlet Villages scoring the least.
- 2.4 Whilst the methodology provides a useful indication of relative settlement sustainability, the JLP itself accepts in paragraph 08.03 that it is indeed only an indication. This raises concerns of how potentially limiting the exercise of apportioning growth based largely on a settlement's position in the settlement hierarchy may impact on the Plan's ability to deliver sustainable development and its development needs in full over the Plan period.
- 2.5 We also raise concerns regarding the methodology itself and how the Settlement Hierarchy Scoring lacks sophistication to reflect the character of the District and could have been improved to provide a more accurate picture of the suitability of settlements for development. Our concerns relate to:
- A lack of consultation on the scoring system prior to its use to establish a settlement hierarchy and the important implications that result from the hierarchy;

Matter 4 – Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process

- An identical score for factors that are (we would argue) of lesser or greater importance to the sustainability of a settlement or its ability to provide housing or employment growth. For example, a settlement receives a maximum score of 1 for containing a preschool, secondary school, post office, village hall, places of worship, library or allotment;
- The score for being within proximity of a higher tier settlement is not cumulative for proximity to several such settlements, de-valuing and failing to fully recognise the better-served villages. This is certainly the case for smaller Hamlet villages such as Norton Little Green, that in itself may lack certain services and facilities but is in close proximity to highly sustainable places including Elmswell, and clustering near more sustainable villages such as Norton;
- The score for proximity to higher tier settlements is entirely unreflective of the score for that nearby settlement, meaning its relative sustainability due to location of services is simply a score for the distance to any higher tier settlement and not based on what may be available. We consider a score based on the score of the nearby settlements would be more effective and reflective. Again, this applies to the likes of Hamlets such as Norton Little Green that are located close to Elmswell, which benefits from a train station, amenities and services worthy of higher merit for sustainability;
- Distances to nearby settlements should be based on travel time and not straight line distance to better reflect the character of the district.

2.6 SP03 and supporting paragraphs (e.g. 08:04) do reference other contributing factors that need to be taken into consideration when establishing the scale and location of new development across the Districts, and whilst this is supported it is felt that in the absence of a robust scoring system underpinning the Settlement Hierarchy Review, stronger wording is required in the policy to ensure the decision maker does not rely too heavily on the position of the settlement in the hierarchy in decision-making, but rather ensures that other factors are appropriately considered. Extra caution should be applied when using the settlement hierarchy in this instance, given that the sustainability scores that dictate the position of a settlement in the hierarchy are based on an 'indicative' weighted score, which as above we consider to be flawed.

2.7 We therefore consider the policy in its current form to be overly prescriptive. Whilst it acknowledges other considerations are required in addition the settlement hierarchy when determining the scale and location of development, in the absence of more robust, clear

Matter 4 – Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process

wording that a settlement's position in the hierarchy should not be used as a blunt tool for decision making, it risks placing too much reliance on the settlement hierarchy in apportioning growth. This could result in overly simplistic decision-making, that fails to account for wider sustainability issues.

- 2.8 We believe SP03 can be made sound through modifications to the policy wording, as set out below:

*In all cases The scale and location of development will depend **on a balanced assessment of factors, including (but not limited to):** the upon the role of settlements within the settlement hierarchy defined in Table 2 and Table 3, the spatial distribution, the capacity of existing physical and social infrastructure or new/enhanced infrastructure, as well as having regard to the natural, built and historic environment. **A settlement's position in the settlement hierarchy, as defined in Table 2 and 3, will form an important consideration but will not be the defining determinant and is only an indication of a settlement's capacity for sustainable development.** Development which would lead to visual or physical coalescence of settlements will not be supported.*

3.0 Response to Matter 4, Issue / Question 4.6

Question: 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?

- 3.1 We raised concerns with regards to spatial distribution and Policy SP04 within our Regulation 19 submissions.
- 3.2 As requested, we do not repeat points made in our Regulation 19 representation here. However, we do wish to stress that our concern regarding the lack of growth to Hamlets across both Districts remains. Whilst it is right that the spatial strategy should focus additional growth towards Market Towns, Urban Areas and Core Villages by virtue of their sustainability (i.e. access to services and facilities, employment, public transport, infrastructure etc.), proportionate growth should also be proposed towards more rural settlements such as Hamlets and Hinterland to ensure their sustained vitality and positive growth over the Plan period.

Matter 4 – Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process

- 3.3 As per our Regulation 19 representations, and for the reasons detailed within them, we consider this elements of Policy SP04 to be unsound. It is not consistent with national policy with regards to supporting rural communities and economies, and fails to be positively prepared as the full housing needs of small settlements will not be met over the Plan period.
- 3.4 We do however believe SP04 can be made sound by recognising the need to introduce greater levels of growth to Hamlets spread across the Plan Period, which sites such as Land South of Ashfield Road can contribute towards.