

JLP Core Document Library Ref: G01  
Your Ref: -

Date: 23/04/2021

Mrs Annette Feeney  
Programme Officer

**By email only**

**Re: Babergh and Mid Suffolk Joint Local Plan Examination**

Dear Mrs Feeney,

The Inspectors have raised a number of queries. Please find the Councils' response enclosed.

Yours Sincerely,



Tom Barker  
Assistant Director – Planning and Communities  
[Tom.barker@baberghmidsuffolk.gov.uk](mailto:Tom.barker@baberghmidsuffolk.gov.uk)  
01449 724647  
07747 460301



---

**Babergh and Mid Suffolk District Councils**  
Endeavour House, 8 Russell Road, Ipswich IP1 2BX  
Telephone: (0300) 1234 000  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**1. Did the emerging spatial distributions influence the selection or rejection of sites in the Strategic Housing and Employment Land Availability Assessment (SHELAA)? Or were the sites discounted (as detailed in Appendix E of the SHELAA) rejected solely on the basis of site-specific issues, rather than position of the relevant settlement in the settlement hierarchy and the indicative proportion of development to be distributed to each category of settlement?**

- 1.01 The emerging spatial distributions have not influenced the selection or rejection of sites in the SHELAA ([Document EH06](#)). Conversely, the total capacity of SHELAA sites has informed the identification of reasonable alternatives of the emerging spatial distributions. The methodology for the SHELAA assessment undertaken is set out within the document ([Document EH06](#), p8 and Appendix A) and Appendix E provides the reasons for discounting sites based this approach.
- 1.02 As set out in Joint Local Plan – Topic Paper: Settlement Hierarchy Review ([Document EP01](#)), the settlement hierarchy has been constructed by a self-contained, objective methodology. It therefore has no direct influence with the SHELAA. However, several of the factors used in Appendix A of the SHELAA to assess the suitability of sites, such as accessibility to local services and facilities, access to wider transport networks, and infrastructure capacity, are also relevant to the formulation of the hierarchy and the categorisation of settlements within that hierarchy. There is, therefore a general relationship between the outcomes of the two exercises but they were not specifically integrated.
- 1.03 The Councils reviewed the outcome capacity of the SHELAA to test if there are insufficient sites / broad locations to meet needs – there was sufficient site capacity to meet needs (Document EH06, p16). Subsequently, the sites assessed as deliverable or developable in the SHELAA formed the ‘long list’ basis from which further Sustainability Appraisal and site selection for allocation in the Plan was made, having regard to various other factors.
- 1.04 It was important that the reasonable alternatives of spatial distributions was informed by the total capacity of SHELAA sites, otherwise there would be no robust credibility that the reasonable alternative options could be delivered by realistic sites.



**2. We note that “Settlement Hierarchy” is criterion 3b of the Sustainability Appraisal (SA) assessments and the standardised scoring process for this criterion is detailed in Appendix C of the SA. Whilst we appreciate that it will inevitably vary from site to site, in general was the settlement hierarchy score of any particular significance in determining which of the sites to select for allocation in the plan?**

- 2.01 The proposed settlement hierarchy provides a tool that distinguishes between those settlements that have the services and facilities that might be expected to be present in town, district, local and neighbourhood centres within different types of settlement. This categorisation was therefore used to appraise sites against criterion 3b in the SA - the proximity of site options to higher and lower order settlements informed the appraisal of their likely effects in terms of providing access to jobs and services. SA Criterion 3b was one of many criteria used to appraise the sustainability performance of sites, and the scoring system in the SA was designed to identify significant effects across all the relevant SA objectives, which then fed into decisions about which sites to allocate and which to discount, alongside other evidence.
- 2.02 The SA Framework in Table 2.5 of the SA Report ([Document A03](#) p17) comprises a set of 16 SA objectives, against which the policies and sites in the JLP were appraised. SA Appendix C ([Document A04](#) p136) sets out the 40 site assessment criteria (labelled 1a to 16c) and associated assumptions that were used to appraise the residential and employment site options. For the residential sites, four of the 40 criteria result in negligible/uncertain effects for all sites; therefore there are 36 criteria against which all residential sites were assessed. Criterion 3b (Settlement hierarchy) is one of three criteria used to assess the likely effects of site options on SA Objective 3: To reduce poverty and social exclusion and ensure access to jobs and services. It is important to note that the settlement hierarchy was used in the SA specifically as a proxy for assessing access to jobs and services in the context of SA objective 3.
- 2.03 Noting the SA separate assessment work specifically for SP03 (settlement hierarchy) and SP04 (spatial distribution), criterion 3b of the SA identifies the primary factor in the SA where those issues are set out in a consistent and measurable format for each site (together with 36 other criteria). However, in addition to the consideration of SA material, the determination of which sites to select for allocation in the Plan was also carried out through planning judgements and a Member engagement process. The Consultation Statement ([Document A06](#) p. 16, 43 and 58) further sets out the Councils’ approach to site selection in the development of the Plan having regard to consultation issues raised and matters of relevance from the evidence base. The SA Appendix G (Document A04 p879) sets out reasons for discounting sites.



- 2.04 The settlement hierarchy itself was constructed through the methodology set out in [Document EP01](#). Reasonable alternatives to the methodology were considered through the SA process. Independently, the SA process found that growth in settlements towards the top of the settlement hierarchy generally performed best in sustainability terms (Paragraph 5.31 to 5.34 of the SA – [Document A03](#)). In bringing forward an appropriate strategy for development, the Councils were therefore mindful of the enhanced sustainability benefits of development sites in the higher settlement categories. To this extent, the settlement hierarchy was of particular significance to the overall pattern of growth proposed in the Plan.
- 2.05 However, whilst the settlement hierarchy itself is considered a useful tool for identifying and considering the relative sustainability of settlements, there are notable planning factors to consider within it. Not all settlements within a category can be treated the same, in respect that they may have similar services and facilities, but very different local constraints and infrastructure context which can influence suitability for sites to select for allocation in the Plan. Site selection is therefore both a ‘top down’ and ‘bottom up’ process.
- 2.06 Because of this interplay between both ‘top down’ and ‘bottom up’ factors in site selection, it was considered that it would have been unduly mechanistic to strive for an outcome where each tier in the hierarchy would necessarily accommodate growth directly matched to its place in the hierarchy, so that the top tier would accommodate more growth than the tier below it, and that lower tier would accommodate more growth than the tier below it, and so on. Generally speaking, such an outcome has been achieved in Babergh, when looking at the respective scales of ‘new homes’ (rather than existing commitments) in Policy SP04, but that is not the case in Mid Suffolk, where the Core Villages will accommodate more growth than the higher tiers if looked at individually (but not if looked at together). Tables 7.6 and 7.7 for Babergh District and Tables 7.12 and 7.13 for Mid Suffolk District in the SA Main Report ([Document A03](#) p243), which forms part of the appraisal of policy SP04.
- 2.07 Tables 7.6 (Babergh) and 7.12 (Mid Suffolk) show the number of dwellings allocated to each tier of the settlement hierarchy as per policy SP04, set against the total number of each type of settlement e.g. Market Towns and Urban Areas, Core Villages, Hinterland Villages etc. that exist in both Babergh and Mid Suffolk. For example, there are significantly more Core Villages in Babergh District (13) than there are Market Towns and Urban Areas (3) and so the total number of homes listed for each type of settlement under policy SP04 should be considered in that context – it is clear that the Market Towns and Urban Areas, which the SA found to be the most sustainable locations for additional development, will receive more homes on a settlement by settlement basis than other categories of settlement in the hierarchy in both Babergh and Mid Suffolk.



- 2.08 Tables 7.7 (Babergh) and 7.12 (Mid Suffolk) show how the overall distribution of housing between the various categories of the settlement hierarchy will change for each District over the plan period, with an increasing proportion at settlements higher up the hierarchy (Ipswich Fringe, Market Towns and Urban Areas, Core Villages) than settlements lower down the settlement hierarchy (Hinterland Villages, Hamlets). The only exception to this is for the Core Villages in Babergh District, which will have a slightly lower proportion of the housing stock (39%) than at the beginning of the plan period (41%).
- 2.09 In conclusion, the outcome of the distribution exercise is the result of a careful iteration across the full range of factors that were considered, rather than an approach which used the hierarchy to 'force' a result that was no more than a reflection of that hierarchy.



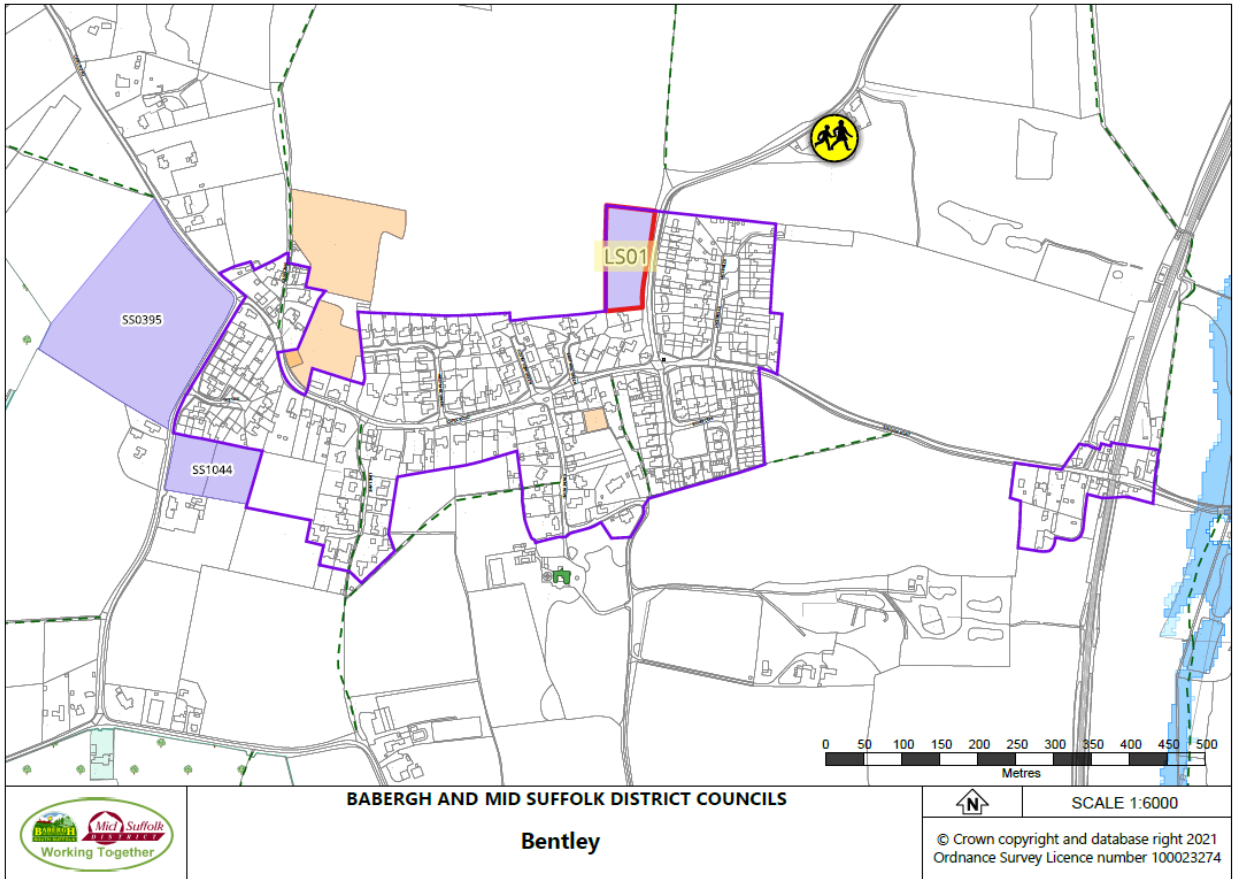
**Babergh and Mid Suffolk District Councils**  
Endeavour House, 8 Russell Road, Ipswich IP1 2BX  
Telephone: (0300) 1234 000  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**3. Appendix G of the SA provides brief details of the reasons for the selection or rejection of each of the sites appraised. Picked simply as an example from the first page of this appendix to aid our understanding of the process, we have looked in particular at the sites appraised in Bentley. Poor accessibility to key facilities is identified as part of the reason for rejection of two of the Bentley sites. Does this refer to the sites' accessibility to the settlement's own facilities or more generally to Bentley's relatively limited facilities as a whole as a hinterland village? The reason given for the selection of the land west of Church Lane site is its proximity to services/facilities, particularly the primary school. Is this site significantly more accessible to the settlement's services/facilities than the two rejected sites?**

3.01 The commentary on the rejection of sites in Appendix G of the SA is in most cases specific to the settlement and services and facilities within each relevant settlement. The wider consideration of the sustainability and accessibility to services and facilities, has generally been a strategic consideration in the relative scales of growth attributed to the spatial distribution (Policy SP04).

3.02 In the case of the Bentley sites (please see map below), the rejected sites (to the west of the village with "SS####" references) are located approximately 0.7 miles from the primary school (located to the north-east of the village – see yellow symbol). The JLP proposed site (labelled "LS01") on Church Lane is located to the east of the village and the primary school is located approximately 0.2 miles from the site which is considered within the village to be considerably more accessible. There are also other facilities such as the Baptist Church and bus stop which are located nearby (to the south) to the JLP proposed site.





**Babergh and Mid Suffolk District Councils**  
 Endeavour House, 8 Russell Road, Ipswich IP1 2BX  
 Telephone: (0300) 1234 000  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**4. Overall has the settlement hierarchy and the distribution of development between the categories of settlement been of particular significance in the selection of housing sites allocated in the plan, or has it generally been an issue of relatively limited significance, simply as one of a large number of factors considered in determining which housing sites to allocate?**

4.01 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. Other factors such as local constraints, deliverability and infrastructure context have also been of main importance to decision making where they are relevant. As indicated above, the Councils have not sought to achieve an outcome for the distribution that is simply reflective of the tiers in the hierarchy, since that would have been unduly mechanistic. The spatial distribution has been a ‘top down’ and ‘bottom up’ process, informed by the assessment of 9 spatial options set out in SA Chapter 5 ([Document A03](#) p.49) and SA Appendix D ([Document A04](#) p.166) as well as the supply of appropriate sites appraised in SA Chapter 6 ([Document A03](#) p.65) and Appendix E ([Document A04](#) p.195). The figures listed in Policy SP04 represent the outcome of the holistic approach taken and was not a mechanical target to determine site selection.

4.02 Paragraph 09.08 of the JLP (Document A01) broadly describes how the selection of sites has been approached in the Plan making process:

*09.08 The new development locations have been identified with consideration to consultation responses, the availability and deliverability of sites, the preferred spatial distribution pattern, the sensitivities and constraints of the area (eg. flood zones, heritage features and landscape designations etc) and the infrastructure capacity and opportunities (eg. schools and healthcare etc). Sites judged to perform best overall against the above criteria and evidence base outcomes have been proposed in this document.*

4.03 As evidenced by Tables 8 (p. 7) and 9 (p. 8) of the Joint Local Plan – Topic Paper: Spatial Housing Approach ([Document EP03](#)), a substantial volume of dwellings has already been approved planning permission across Babergh and Mid Suffolk districts. This has therefore determined a large proportion of the spatial distribution and the selection of housing sites allocated in the Plan.

4.04 The settlement hierarchy and spatial distribution are both factors that have played a part in the formation of an appropriate Plan including allocations. They broadly reflect the overall principles of sustainability and have both (together with reasonable alternatives) been tested iteratively in the SA process. However, they are not the only factors. Either alone or in combination with other factors, deliverability (Appendix C of the SHELAA, [Document EH06](#), listed sites where



availability and/or achievability is uncertain), local site specific constraints identified in the evidence base, such as flood risk (Document EE11 and EE16), heritage asset impact (Documents EE13 and EE15) and infrastructure matters have also been significant to decision making where relevant.

- 4.05 For example, Glemsford (Babergh district) is a Core Village location where, at the emerging Plan stages, the Infrastructure Delivery Plan and consultation with statutory consultees indicated that there were significant infrastructure constraints (limited education capacity and lack of feasible expansion potential) to enable sustainable development. In that context, infrastructure was of particular significance to proposed growth and site allocations there.
- 4.06 Another example would be in Eye (Mid Suffolk district) whereby the Regulation 18 JLP (Document B09, p 41) Neighbourhood Plan housing target (matched with proposed sites) indicated a figure of 541 dwellings. Through consultation responses, and parallel development of the Eye Neighbourhood Plan (an Examiner's Report was published in Oct 2019), the relevant housing target and sites selected for Eye in the Regulation 19 JLP were revised to support a figure of 663 dwellings.



**Babergh and Mid Suffolk District Councils**  
Endeavour House, 8 Russell Road, Ipswich IP1 2BX  
Telephone: (0300) 1234 000  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)