

Babergh and Mid Suffolk Joint Local Plan Examination Hearing Statement

Matter 10 – Overall Supply of Housing Land

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

June 2021

Matter 10 – Overall Supply of Housing Land

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Matter 10 – Overall Supply of Housing Land

1.0 Introduction

- 1.1 This Hearing Statement in respect of Matter 3 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, with our principal concern being the approach taken to spatial strategy, with attention drawn to the spatial distribution and the settlement hierarchy to comprise inherent flaws so as to risk the fossilisation and stagnation of rural communities over the plan-period. In addition, we do not to consider the process by which the Site has been considered and rejected for allocation to have been robust, and as such cannot be justified. We consider that current defects in the submitted JLP can be assessed through main modifications.
- 1.5 This Hearing Statement concerns Matter 10 (Overall Supply of Housing Land); and, specifically, addresses Issue/Question 10.1.

2.0 Response to Matter 10, Issue / Question 10.1

Question: Is there convincing evidence that

(a) the plan will ensure that the housing requirement across Babergh and Mid Suffolk to 2037 will be met?

(b) an ongoing five year supply of deliverable housing land in both districts will exist throughout the plan period?

2.1 We have two concerns in respect of the housing trajectory, both pertaining to the five-year housing land supply position in the early years of the plan period:

1. The potential inclusion of a contribution from small sites in the supply from 2020/21, which had permission in 2018 and therefore may have been completed prior to 2020/21.
2. The optimistic assumptions made in respect of the lead-in times for large sites included in the housing trajectory.

2.2 Upon review of the trajectory, in particular the sites allocated under policy LS01 and their contribution to the supply in the early years of the Plan period, we have concerns over the reliance of these sites to contribute to supply from the start date of the supply trajectory (i.e. April 2020). A number of these sites are outstanding planning permissions from 2018, and therefore may have been built out prior to 2020. Whilst it is of course a valid approach to include these in the housing supply over the Plan period starting at the base date of 2018, it is inappropriate to include them again in the supply from 2020/21 if they have been completed prior to then. There is a potential risk of double-counting, and it is not clear from the evidence we have seen that the trajectory avoids this.

2.3 We also have concerns regarding the numbers relied upon from sites involving major development which do not benefit from detailed permission. Both Babergh and Mid Suffolk's five-year land supply positions (Examination document references EM04 and EM05, respectively) assume completions from sites involving major development, but which only benefit from outline planning permission, from 2021/22. For such sites, approval of reserved matters is still required, and it will still be necessary to discharge all necessary conditions, meet any S106 obligations, and agree any S278 requirement prior to commencement of development. We consider one cannot assume completions will be realised on such sites in 2021/22, particularly given we are already into this year.

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- 2.4 We consider that the above concerns can be addressed through the allocation of additional smaller sites with the potential to contribute early in the plan period, and bolster the five-year housing land supply position, ensuring it is robust.