

Babergh and Mid Suffolk Joint Local Plan:

Examination Statement: Matter 10

Ashes Farm, Stowmarket

Prepared by Fisher German LLP
on behalf of St Philips Land Limited



Project Title:

Ashes Farm, Stowmarket

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01 Introduction

1.1 This Position Statement has been prepared by Fisher German on behalf of St Philips Land in respect of its land interests at land north of Ashes Farm, Stowmarket (LA035).

1.2 An application for outline planning permission (with all matters reserved except for access) for up to 300 dwellings was submitted to Mid Suffolk District Council in March 2020 and has been assigned reference DC/20/01036. The following documents have been prepared to support the application. This suite of documents demonstrates that there are no technical constraints to development of the site.

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| - Site Location Plan | - Bat Preliminary Roost Assessment |
| - Illustrative Masterplan | - Bat Emergence Survey Report |
| - Design and Access Statement | - Bat Activity Survey Report |
| - Transport Assessment | - Breeding Birds Survey |
| - Travel Plan | - Built Heritage Statement |
| - Flood Risk Assessment and Drainage Strategy | - Archaeological Desk Based Assessment, including Geophysical Survey |
| - Landscape and Visual Impact Assessment | - Acoustic Design Statement |
| - Arboricultural Impact Assessment | - Air Quality Assessment |
| - Preliminary Ecological Appraisal | - Phase 1 Ground Condition Report |
| - Badger Survey Report | - Viability Assessment |
| - Reptile Survey Report | - Utilities Assessment |
| - Great Crested Newt Survey | - Statement of Community Involvement |

1.3 The Illustrative Masterplan which supports the application has been formulated based on the findings of the technical work listed above and has been appended to these representations. For any further information please refer to the application documents as available on the Council's website. The site area under the control of St Philips is provided at Figure 1 below.



Figure 1: Google Earth extract outlining land under the control of St Philips Land Limited

- 1.4 Ashes Farm was allocated for residential development within the Stowmarket Area Action Plan, 2013, under policy 6.13. The allocation is being brought forward in two parts; the western parcel being promoted by St Phillips Land as delineated on the above Figure, with the eastern parcel being advanced by Crest Nicholson, who have themselves submitted a full application for 265 dwellings (DC/21/03287) on the eastern part of the allocated site in June 2021.
- 1.5 St Phillips Land are committed to bringing this site to the open market as soon as outline planning permission has been achieved, with a view to ensure early delivery in line with the Councils proposed trajectory. There is housebuilder interest in the site.
- 1.6 These representations focus solely on allocation LA035: Ashes Farm, Stowmarket and in particular our client's interest in this allocation as delineated at Figure 1.

02 Matter 10 – Allocation Sites for Housing and Other Development and Settlement Boundaries

Q10.1 Is there convincing evidence that:

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

- 2.1 Having regard for the submitted planning applications on Policy LA035: Ashes Farm, Stowmarket, it is considered that there can be significant confidence that the Ashes Farm development will deliver approximately 565 dwellings during the Plan period.
- 2.2 There is a full application currently under consideration for 265 dwellings on the eastern part of the allocation, with a further outline application for up to 300 dwellings on the western parcel (Figure 1). The full application is being advanced by a large national housebuilder, who will likely commence delivery soon after achieving a permission and with the resources, experience and ability to deliver reasonable annual numbers post commencement.
- 2.3 In respect of the outline, St Phillips Land are experienced land promoters with strong links to housebuilders. Once consent is achieved the site will be marketed and disposed of quickly, to enable a housebuilder to advance a reserved matters application/s and subsequently begin delivery on the western parcel from Newton Road.
- 2.4 Having regard for the site's context and likely phasing, it is assumed on commencement of the western parcel, there will be two housebuilders building concurrently for most of the development of the site. It is therefore considered to be a robust assumption that the Ashes Farm application will deliver approximately 565 dwellings over the Plan period. Whilst this is 10 dwellings below the notional allocation, this shortfall is relatively minor and negligible in the context of the wider allocations made in the Plan.

Q10.1 Is there convincing evidence that:

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

- 2.5 In respect of five-year housing land supply, it is considered likely that Policy LA035: Ashes Farm, Stowmarket can begin delivery within the first 5-years post adoption of the Plan. It is noted that the submitted Mid Suffolk 5-Year Housing Land Supply Report, which supports the Plan, does not make any provision for the delivery of housing on the Ashes Farm allocation within the first five years. This is considered to be an overtly pessimistic position having regard for the up-to-date planning position in respect of the site.
- 2.6 To be included in an authorities housing land supply, the NPPF Annexe 2 sets out that a site must be *“available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years”*. Where a proposal for major development obtains full planning consent, it should be considered deliverable unless clear evidence exists that the housing will not be delivered within 5 years. This could be due to issues of viability or a demonstrable lack of demand for the units consented.
- 2.7 Where major development benefits from an outline consent, an allocation within the development plan, a grant of permission in principle or is identified on the Council’s brownfield land register, it can be considered as deliverable where there is clear evidence that housing completions will begin within 5 years.
- 2.8 The Planning Practice Guidance sets out that evidence which may justify deliverability of sites referenced above, includes:
- current planning status, i.e. for sites with outline consent, the progress made towards achieving reserved matters consents. This could link to planning performance agreements where this exists and set out clear timescales towards the approval of reserved matters approval or discharge of conditions applications.
 - Firm progress towards the submission of an application, including written agreement between the Local Authority and the applicant which confirms the delivery intentions on the site. This could include a target commencement date and expected delivery rates.
 - Progress with any required site assessment work.

- Clear and relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar avenues of funding.

2.9 Having regard for the two applications being advanced on the Ashes Farm allocation, neither yet benefits from a full consent, albeit a full application has been submitted for the eastern parcel. It is not clear when a consent for this site may be forthcoming, but it may well be achieved prior to the upcoming Local Plan Examination hearing sessions this autumn, and very likely before the Plan's adoption. Regardless, having regard for the provisions of the NPPF, it is still possible to include Ashes Farm in the 5-year housing land supply calculation.

2.10 In respect of the full application, Crest Nicholson is best placed to advise what it expects to deliver annually and when they hope to commence development. Given the site may soon have a full planning permission, it is assumed this application may be able to make a significant contribution to five-year housing land supply in the years post adoption of the Local Plan.

2.11 In respect of our client's interests, whilst only outline is being advanced at present, having regard for the likely timescales to adoption of the Local Plan, we consider that the land to the west of Ashes Farm can also make a contribution to the Council's 5-year housing land supply position post adoption. If an outline consent can be achieved prior to the Plan's adoption, which we are hopeful for, we consider the western parcel conservatively could deliver 75 dwellings to the 5-year supply position, assuming;

- Two years to market and dispose of the site and the subsequent approval of reserved matters and any relative discharge of conditions applications.
- One year for development to begin on site and delivery of 15 dwellings
- Delivery of 30 dwellings a year in the final two years.

2.12 This is considered to be a conservative but robust estimation as to housing delivery possible on the site. Obviously, every attempt would be made to expedite delivery and increase the development rate, but given the site is not likely to benefit from a full planning permission at examination, a more cautious approach is considered justified, particularly given likely comments from omission sites.

2.13 Whilst Ashes Farm has been allocated for some time, a fact which may draw criticism and concern, it is clear with the current planning applications submitted that delivery on the site has never been closer. The allocation is being advanced by a housebuilder and promoter, both of whom are experts in housing delivery and there can therefore be significant confidence in site delivery in the coming years.

2.14 Having regard for the above, it is considered that the Council should look to positively include Ashes Farm in any updated five-year housing land supply produced to support the Plan throughout the remaining Examination process. We are keen to continue to work with the Council and the Inspector throughout the remaining examination process to provide an up-to-date position on likely delivery timescales on the western part of the Ashes Farm allocation.