



**James Bailey**  
**PLANNING**

**Document:**

Hearing Statement - Examination of the Babergh and  
Mid Suffolk District Council Local Plan Review  
(2018-2037)

**Title:**

Matter 10 – Overall Supply of Housing Land

**Client:**

Taylor Wimpey UK Ltd.

**Date:**

August 2021

# **Hearing Statement**

**Matter 10 – Overall Supply of Housing Land**

**Statement on behalf of Taylor Wimpey UK Ltd. in relation to sites at:  
Debenham and Needham Market;**

**Examination of the Babergh and Mid Suffolk District Council Local Plan  
Review 2018-2037**

**August 2021**

## 1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of our client Taylor Wimpey UK Ltd. in respect of Matter 10 Overall Supply of Housing Land of the Inspector's "Matters, Issues and Questions" for the Examination of the Babergh and Mid Suffolk Joint Local Plan.
- 1.2 The Statement is intended to assist the Inspector's review of the questions raised in Matter 10, which is due to be considered for the discussion at the Examination Hearing session on Tuesday 9<sup>th</sup> November 2021.

***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***

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

- 1.3 During the Matter 4 preliminary session between the Councils' and the Inspectors' on the 21 July 2021, there was a discussion over the absence of published evidence as to why sites have been either "selected" or "dismissed", including the Councils' final decision on an appropriate number of houses required for individual settlements.
- 1.4 This discussion concluded with the Inspectors' struggling to find the evidence in order to judge the 'soundness' of the proposed spatial strategy. Indeed, the Inspector confirmed that a crucial piece of evidence was not publicly available, relating to the site assessments for the discounted sites.
- 1.5 It is therefore unhelpful that the submission deadline for the Matter 10 Hearing Statements is before this further evidence work is available for all interested parties to review, consider, and comment on.
- 1.6 On a related point, it is unclear whether the 20% buffer has effectively been assessed, and it remains uncertain as to why other sites were actually discounted and on what basis they were not taken forward.
- 1.7 Taylor Wimpey acknowledges that their sites at Debenham and Needham Market currently do not feature as allocations within the JLP. However, Taylor Wimpey remain keen to promote and secure both sites as 'reserved sites' through the current JLP process. The identification of 'reserved sites' has been successful in other plans across the Districts, notably in the case of the Stowmarket Area Action.

- 1.8 The BMSDC Joint Local Plan proposes to meet the housing needs for both of the Districts, but there is always a risk that some sites do not get built-out, or additional housing needs arise.
- 1.9 The JLP proposes a 20% buffer to safeguard against this to some degree, noting our previous point in 1.6, but to ensure successful deliverability the Plan could seek to secure additional 'reserve' sites.
- 1.10 It is therefore considered that Babergh and Mid Suffolk District Councils should identify reserve housing sites in the higher tier settlements, which the Council can release for development by 2037, 'if' its monitoring indicates that they are required. The main purpose of reserve sites would be to enable the Council to maintain a five-year housing land supply, but also to help contribute to any identified unmet need or shortfall arising from either inside or outside the respective District.
- 1.11 The reserve sites should have a policy within the JLP identifying the reserve housing sites and the mechanisms for their release, should they be required.
- 1.12 Taylor Wimpey's land at Debenham and Needham Market are both suitable to be considered as reserved site allocations, and the explanation for considering these sites is set out below.
- 1.13 **Debenham – land north of Gracechurch Street.** The starting point for the numbers in the Joint Local Plan is the adopted Debenham Neighbourhood Plan, which clearly suggests that the three identified sites could deliver between 112-262 houses to 2036. 261 are identified in the JLP table 04 supporting SP04, however there is already a loss of 50 dwellings because live applications on land south of Low Road LA056 (DEB 3 20/02129) and LA058 (DEB5 21/02982), land east of Aspoll Road, are bringing forward a lower number of dwellings of 18 (rather than 35) and 54 (rather than 87) respectively. This trend is continuing which jeopardises the JLP deliverability.
- 1.14 The JLP approach to handover housing numbers to the Debenham Neighbourhood Plan is not only at risk by lower housing number being brought forward by applicants as sites were not assessed thoroughly enough when allocating, but also objections from the local community. In the example of LA058 which is a planning application, Debenham Parish Council and local residents have strongly objected to it despite it being a site identified in their own adopted Debenham Neighbourhood Plan.
- 1.15 In addition LA057 will not be developable in the next 8-9 years due to a restrictive covenant which prevents access to the site. LA057 is the largest development of 140 dwellings and with the other allocations delivering less than the plan envisages there is a very strong argument to support more sites and/or flexibility to deliver reserve sites.

- 1.16 The Taylor Wimpey sites to the north and south of Gracechurch Street, offer various unique and different opportunities to this important village, that no other site can provide. This includes land for a new primary school; land for a new pre-school; land to supplement the secondary school; additional parking facilities; improved play facilities; and the only site/s that can significantly contribute to reducing the flooding situation in Debenham by incorporating space for water in times of flood within the development layout.
- 1.17 The Debenham Neighbourhood Plan is in its third year and so far has seen two of its own allocations achieving 42% less dwelling numbers, through applications the local community opposed, than those set out in the Joint Local Plan. The third and largest allocation is prevented from being delivered for at least 8 years by a restrictive covenant, it is therefore requested that the Local Planning Authority should now ensure that genuinely deliverable sites are reserved in the Joint Local Plan.
- 1.18 Therefore, a reduced area of land to the north of Gracechurch Street should be considered for a reserved site for approximately 100 dwellings, which will be able to come forward should it become clear that 261 houses will not be delivered to Debenham by 2037.
- 1.19 **Needham Market – land off Barking Road.** Taylor Wimpey continue to question why the Town of Needham Market, as one of Mid Suffolk's most important and sustainable settlements, does not identifying sufficient sites for future growth during the extended plan period.
- 1.20 Although there having been discussions about a possible relief road to the south of Needham Market in the past, the Neighbourhood Plan has purposefully taken the decision not to include identified sites for future housing growth.
- 1.21 The adopted Neighbourhood Plan has left the housing decision to the District Council, and the District Council has purposefully avoided making these decisions. Therefore, Taylor Wimpey are keen to see additional housing sites brought forward in this highly sustainable settlement.
- 1.22 Needham Market has plentiful amenities and facilities, including pre-schools; a primary school; doctor's surgery; a train station and dental practices. It can therefore be seen that Needham Market is a highly sustainable location.
- 1.23 The Mid Suffolk District Council element needs to identify significantly more sites, which are realistically deliverable and viable to support the currently identified housing supply. It is evident that to ensure the Council's housing need can be met that realistically deliverable sites should be identified.

- 1.24 Land off Barking Road is requested to be a reserved site for 120 dwellings, which could only come forward should it become clear that further growth is needed for Needham Market after 2028.

### **SUMMARY**

- 1.25 Overall, it is considered the Council's land supply is not sufficiently robust as it is over reliant on villages that are not as sustainable with their range of services and facilities, when compared to the likes of Debenham and Needham Market.
- 1.26 This approach reduces not only the sustainability but also the saleability of the housing product which means they may not be as attractive to potential buyers as houses are in the wrong locations.
- 1.27 The Plan fails to provide certainty that a five-year supply of deliverable sites will be available on adoption and over the duration of the plan period. The most appropriate way forward would be to revisit the spatial strategy and redistribute an element of the housing requirement.

***August 2021  
JBPL***



**James Bailey**  
**PLANNING**