



# Babergh and Mid Suffolk

## Joint Local Plan

# Hearing Statement – Matter 4

Settlement Hierarchy, Spatial Distribution of  
Housing and Housing Site Selection Process

June 2021



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## Introduction

This Hearing Statement has been produced by the Councils for the Babergh and Mid Suffolk Joint Local Plan (JLP) Examination in response to the Inspectors' Matters and Questions. The entire Core Document Library for the JLP Examination can be accessed online. The Councils have responded to each Question directly in the body of the Hearing Statement. Appendix 1 provides a specific but brief response to each of the Main Issues raised during the period for representations following the publication of the JLP (as requested at paragraph 22 of the Inspectors' Examination Guidance Note).

For further information please visit the Councils' JLP Examination webpages below:

<https://www.babergh.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-submission/joint-local-plan-examination/>

<https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-submission/joint-local-plan-examination/>



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## Question 4.1

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

- 1.01 The Councils have produced a robust and objective settlement hierarchy, with the methodology and outcomes are fully set out in Topic Paper – Settlement Hierarchy Review ([Document EP01](#)).
- 1.02 In summary, a proportionate approach has been taken using a point scoring system to broadly establish the relative sustainability characteristics of all settlements (settlements are defined as ten or more well related dwellings) through the Plan area.
- 1.03 The settlement hierarchy evidence is naturally a snapshot of services and facilities at the time it is recorded, however this has been developed based upon further evidence and consultation responses during the production of the JLP. If required, the evidence base and Plan can be updated accordingly through the formal Plan review mechanisms.

## Question 4.2

- ***Is it sufficiently clear how policy SP03(1) would be applied to (a) development on sites allocated in the plan (b) applications for development not on sites allocated in the plan?***

- 2.01 Policy SP03(1) specifies that the scale and location of development will be considered against a number of key factors, namely; the settlement role in the settlement hierarchy itself, the spatial distribution pattern of the Plan, infrastructure capacity/opportunity and local environmental constraints. In [Document G01](#) (responses to Q2 and Q4), the Councils have explained in more detail the factors which have influenced the selection of housing allocation sites.
- 2.02 For the sites allocated in the Plan, the requirements of SP03(1) have been considered in the planning judgement to identify those sites. It is clear that allocated sites would not be reassessed for their compliance with SP03(1) from a development management perspective, as the allocated sites have already been assessed for their suitability against these factors through the Plan's site selection process. For sites not allocated in the Plan, the factors listed are considered clear and appropriate to enable decision taking on a case by case basis, together with regard to all other policies of the Plan.

### Question 4.3

- ***Is the requirement to demonstrate “exceptional circumstances” for development outside of defined settlement boundaries in isolated locations consistent with NPPF paragraphs 79 and 83?***

- 3.01 Policy SP03(3) should be read in conjunction with the NPPF, particularly para 79, 83 and 103. In other words, development in isolated locations will only be allowed under the criteria allowed for in national planning policy. The Councils consider that the requirement to demonstrate “exceptional circumstances” is consistent with national policy. However, if the Inspectors consider that specific reference to national policy is required, the Councils would be content to propose a modification which may address this point.

**Suggested text ref ST03**

SP03(3) Settlement boundaries have been created as defined on the Policies Map in order to demonstrate the extent of land which is required to meet the development needs of the Plan. New allocations are included within the defined settlement boundaries. The principle of development is established within settlement boundaries, subject to the other policies in the Plan. ~~Outside of the defined boundaries~~ In isolated countryside locations, development will only be permitted in ~~exceptional~~ the circumstances specified in national planning policy.

### Question 4.4

- ***Are the criteria of policy SP03(4a-c) of relevance to the Settlement Hierarchy and do these relate to issues covered by other policies of the plan?***

- 4.01 Settlement boundaries are defined in the Policies Map, and Policy SP03 is the primary policy relating to the application of settlement boundaries for planning decisions. Accordingly, the criteria in SP03(4) identifies the specific local matters to which development inside settlement boundaries are expected to address, and which have historically been challenging in the districts.
- 4.02 The Councils acknowledge there is some overlap with other detailed policies of the Plan, in particular LP19 (landscape) and LP26 (Design and residential amenity). However, due to their local importance, the Councils believe it is appropriate to highlight these matters in a strategic policy. Furthermore, it is not considered there is conflict between the criteria set out in SP03(4a-c) and the other policies of the plan.

## Question 4.5

- ***Is there sufficient clarity as to whether policy SP03(4d) concerns the cumulative impact of the various effects of an individual development proposal or the cumulative impact of more than one development proposal?***

5.01 The Councils' intention behind SP03(4d) is to apply to the cumulative impact of more than one development proposal. For example, to be able to consider the incremental impact upon infrastructure and utilities where baseline capacity is very limited or the visual character impact of intensification of sites.

## Question 4.6

- ***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?***

6.01 The Councils' approach to the spatial distribution of development is set out in Topic Paper: Spatial Housing Approach ([Document EP03](#)) and with some further explanation set out in [Document G01](#) (Q2 and Q4). The SA Main Report ([Document A03](#)), in particular Chapter 5 (p.49) and Chapter 7 (p.240 SP04), set out the process and sustainability assessment outcomes to the development of matters relating to Policy SP04.

6.02 The proposed distribution in Policy SP04 has evolved through development and consultation over three iterations of the JLP. A key point to note from the emerging distribution of development, is the context by way of the significant volume and pattern of growth already established through existing planning permissions. When considering the Pre-Submission JLP document, the residual housing number to be found in Babergh was approx. 3,500 dwellings (out of 9,600 total) and in Mid Suffolk approx. 4,400 dwellings (out of 12,600 total).

6.03 The Councils in the Ipswich Strategic Planning Area (ISPA) have developed a Statement of Common Ground ([Document ES18](#)) regarding the key cross boundary matters for the area. This includes an ISPA vision relating to key economic, social and environmental objectives. The distribution set out in policy SP04 seeks to secure a balance to growth in the strategic transport corridor areas (A12, A14, A140 and railway lines), as well as ensuring that other market towns and rural communities benefit from appropriate growth. Other strategic policies eg. Policy SP05 (economy), Policy SP08 (infrastructure) and SP09 (environment) complement the housing distribution to ensure that sustainable growth is encouraged and compatible with the ISPA vision. Section B2 (p.7) of [Document ES18](#) confirm agreement that the policies address the objectives. By balancing these different planning considerations, the Councils consider that the distribution as set out in SP04, is compatible with national policy. In particular, the spatial distribution provides a sufficient amount and variety of land (NPPF para 59),



promotes sustainable development in rural areas to enhance or maintain rural communities (NPPF para 78) and focuses significant development on locations which are or can be made sustainable, which limits the need to travel (NPPF para 103).

## Question 4.7

- ***Is it sufficiently clear how the numbers and percentages of new homes, by settlement hierarchy categories, set out in policy SP04 will be applied in the determination of planning applications for housing development?***

7.01 The numbers and percentages of new homes set out in Policy SP04 have both informed, and been informed by the proposed allocations of the Plan. The content of Policy SP04 is evidenced by dwelling capacity formed by outstanding planning permissions (as at 01/04/18), new allocations from 2018 to 2037 (including Neighbourhood Plan sites) and windfall growth.

7.02 For the determination of planning applications, Policy SP04 should be read in conjunction with SP03(1) which requires that the scale and location of development will depend upon a number of factors, including the role of the settlements within the settlement hierarchy and the spatial distribution. As set out within SP04, the numbers and percentages of new homes set out in the policy, represents the “broad distribution for growth” and “All identified home numbers are minimum figures.” It is not therefore intended that these figures should be used as ceilings or maximum limits in the consideration of individual proposals for housing development. Policy SP04 is intended to set out the JLP’s overall strategy for the pattern and scale of housing development, in line with para 20 of the NPPF.

7.03 In designated Neighbourhood Plan areas, the minimum housing requirements are clearly set out in Table 04 for which NPs must plan towards.

## Question 4.8

- ***Are the “Total homes required” figures for Neighbourhood Plan Areas, detailed in Table 4, a sum of the outstanding planning permissions (as of 1/4/18) and the sites allocated for housing in the plan in each Neighbourhood Plan Area? If so:***

***(a) are all outstanding permissions from after 1/4/18 identified as housing allocations in the plan or do they need to be otherwise accounted for?***

8.01 The column titled “Total homes required” in Table 04 shows the respective sum of outstanding planning permissions (as at 01/04/18) and new allocations (counted after 01/04/18) identified within the Plan.





8.02 At the approximate time of producing the Pre-Submission JLP document, major housing planning applications granted since 01/04/18 were identified as allocations in the Plan (a total of approx. 5,500 dwellings), to try to avoid any double counting between those planning applications and any allocations within the NP areas. Therefore, most major planning applications after 01/04/18 are identified in the Plan (noting however that the Development Management process is ongoing outside of the plan making process). Minor outstanding permissions (upon which some NPs rely) after 01/04/18 are generally not identified in the Plan. Planning permissions granted after 01/04/18 on sites which have not been allocated within the JLP are classified as windfall development. This is considered a proportionate and realistic approach.

***(b) is it sufficiently clear as to how and when the requirement to identify the indicated total number of homes required in each Neighbourhood Plan (NP) Area will operate in practice; in particular:***

***(i) in respect of outstanding permissions in NP areas which expire (both those pre- and post-dating 1/4/18)?***

8.03 The role of the NP “total homes required” column in Table 04 is the same as the corresponding column in the district tables for Policy SP04. It is intended that the period for the requirement is the same as the Plan ie. 2018 to 2037.

8.04 As per the response to Q4.8(a) above, the Councils expect that emerging NPs can identify a supply of sites to meet the Table 04 NP housing requirement through both extant planning permissions (as at 01/04/18) and new sites after 01/04/18.

8.05 Given the significant numbers of designated NPs in the Plan area, and with approx. 52% (11,500 out of 22,200) of total Plan growth in NP areas, the Councils have identified sufficient allocation sites in the JLP so that the NP minimum targets can be met. This was considered the best approach to ensure that the JLP was robust and could be evidenced with more certainty as deliverable.

8.06 However, since the Pre-Submission JLP document, further planning applications have and will come forward which will affect designated NP areas. As emerging NPs are produced, they may contain updated evidence as to how their respective minimum housing requirements will be met, for example, taking account of a very recent windfall planning application. The robustness of NPs and their allocations will be tested through the NP Examination process.

8.07 Where outstanding permissions which are relied upon to evidence meeting the published NP housing requirement expire, as set out in paras 09.11 and 09.12 of

the Plan, NPs will be reviewed to demonstrate how the minimum figures in Table 04 can be achieved.

- 8.08 For any future designated NPs, any new housing requirement figure will be provided from the same methodology as per the adopted JLP to ensure consistency and fairness. This is expected to be the sum of extant planning permissions as at 01/04/18 and any site allocations made in the Plan.

***(ii) in respect of housing sites allocated in the plan in NP areas for which planning applications do not come forward?***

- 8.09 The Plan does not explicitly identify this scenario. However, where housing sites allocated in the Plan in NP areas do not come forward, the Councils can review these allocations (and potentially the NP minimum housing requirement) as part of any Plan formal review process. Alternatively, emerging NPs or NPs being reviewed, can consider whether the minimum housing requirement from Table 04 of the Plan has already been met, or can be met through alternative/further allocations.

***(iii) is not flexibility to reflect existing permissions/housing allocations which do not come forward already accounted for in the approximate 20% buffer of housing provision over the housing need targets?***

- 8.10 The Councils justification for an approximate 20% buffer of housing provision is set out in response to question 3.4 (Matter 3). This includes the need to maintain delivery of housing over the plan period. The total NP homes required in Table 04 of the Plan sets out a minimum number of dwellings to be provided in the designated areas. In order meet the basic conditions, NPs are required to evidence and deliver against these targets. If each NP area could rely on the 20% buffer as a sufficient reason why it should not meet the minimum number of dwellings for its designated area, the delivery of the overall supply would be jeopardised.
- 8.11 With a very significant proportion (approx. 52%) of total Plan housing supply in designated NP areas, the Councils consider it is important that a range and diversity of supply is maintained throughout the Plan area. For example, if each currently designated NP area failed to deliver housing by 20%, then this would amount to an approx. 2,300 dwelling shortfall of predicted supply, which is 10% of the entire Plan housing requirement. Non-delivery may have potential implications for planned infrastructure improvements set out in the Infrastructure Delivery Plan (Document ER01) and may create issues where critical mass cannot support a proposed project. In order to maintain the delivery of housing at a district wide level over the plan period, the Councils consider it is justified to



require Neighbourhood Plans to offset the corresponding number of dwellings within their Neighbourhood Plan Areas.

#### Question 4.9

- ***The Councils have stated that “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” (paragraph 4.01 of Doc G01). In view of this is it justified and effective to require existing permissions/housing allocation sites which are not implemented to be offset by other sites within the same Neighbourhood Plan Area?***

9.01 Whilst the Councils have stated that the settlement hierarchy and the distribution of development have not been of particular (overriding) significance, they are nevertheless an important factor in setting out an appropriate distribution of growth across the district and subsequently the NP areas. The loss of sites in some areas may lead to the jeopardy of important infrastructure projects such as a viable new primary school which can impact on wider than a designated NP locality. In addition, the settlement hierarchy, spatial distribution and other factors such as local constraints, deliverability and infrastructure context have all been of relevance to the selection of allocation sites (some of which now also have planning permission) since the Plan baseline (01/04/18). They have not been a factor in determining planning applications prior to Plan baseline start date.

9.02 As identified in Question 4.8 above, a considerable amount (approx. 52%) of housing development is located in designated NP areas. The Councils therefore consider it justified and effective, for the delivery of the strategic Plan objectives, to require that NPs are reviewed to seek to deliver against the full housing requirement. However, the Councils’ intention is not to require allocations/permissions made after 01/04/18 to be offset where they are not implemented. The requirement in para 09.11 and 09.12 of the JLP is only to offset against older planning permissions which pre-date the baseline date of the Plan (01/04/18). This is considered appropriate in order to ensure that sites in Neighbourhood Plans remain, as far as possible, deliverable or developable within the context of the JLP and assist with the objective of significantly boosting the supply of homes.

## Question 4.10

- ***Have the housing sites allocated in the plan been selected against possible alternatives using a robust and objective process? [Note: the soundness of specific housing allocation sites and their relevant policy criteria will be considered as part of Matter 9 and this question focusses on the overall approach by which the sites were appraised and selected.]***

- 10.01 The Councils have set out the main approach to the selection of sites in [Document G01](#) (Question 4 response), which broadly entailed a ‘call for sites’ and Strategic Housing and Economic Land Availability Assessment (SHELAA) process ([Document EH06](#)), the refining of the spatial distribution pattern (see [Document A03](#), in particular Chapter 5 p.49 and Chapter 7 p.240 SP04), the consideration consultation responses (see [Document A06](#), p7 and p22) and other key evidence base assessments. The Sustainability Appraisal (SA) ([Document A03](#)) has been undertaken on the policies, sites and alternative options and has informed the selection of sites in the Plan for allocation.
- 10.02 Over 300 potential residential and employment sites have been subject to SA and the process and outcome is summarised in Chapter 6 (p65) of the SA Main Report ([Document A03](#)).

## Appendix 01

### **Main issues raised from R19 JLP consultation statement (Ref A06)**

#### SP03 main issues

<b>SP03 – Settlement Hierarchy Main Issue</b>	<b>Councils' brief response</b>
1. Flexibility should be added to policy, including allowing for edge of settlement sites, well related brownfield sites and infrastructure provision in isolated locations. Settlement boundaries should not be used to refuse otherwise sustainable development.	The JLP seeks to take forward an allocations led plan, to provide certainty to communities and developers. Settlement boundaries have been drawn to meet the development needs of the plan. Development outside of settlement boundaries, cannot be automatically prohibited, but will be beyond the plan requirement and judged on their own merits at the time. Exceptional circumstances for development in isolated locations is set out in national policy.
2. Amendment to para 3) - Reference to isolated locations should be removed as this infers that development outside of settlement boundaries not in isolated locations will be permitted.	As above, isolated locations is excepted in accordance with national policy. Outside of settlement boundaries, proposals will be judged on their own merits at the time.
3. Amendment para 3) Need to clarify what is meant by 'exceptional circumstances.'	This is intended to apply as per the specified national policy circumstances. A policy modification has been proposed for consideration. (see Q4.3 above).
4. Amendment to para 1) - Restricting coalescence should be removed, and/or 'visual coalescence' is too subjective.	Avoidance of visual or physical coalescence is considered to be a clear and appropriate requirement. Ultimately though, this will require an assessment and judgement to be made regarding the merits of each case. For the proposed allocation sites put forward in the JLP, these matters have been considered within the evidence base ( <a href="#">Document EE12</a> ).
5. Reference to para 3) - Settlement boundaries are inadequate to meet overall housing need.	The total development proposed in the plan, and which is included in the settlement, boundaries exceeds the identified overall housing need for the Plan.
6. Need a strategy for hinterland and hamlet villages, and clarity on links to Policy LP01.	The supporting text for the policy (para 08.04) confirms that the categories above hinterland/hamlets will take the largest growth. Residual growth is therefore to assist with a diversity of sites and maintain rural vitality through proportionate opportunities



SP03 – Settlement Hierarchy Main Issue	Councils' brief response
	to meet local needs. Policy provision for windfall development in hamlets is set out in LP01.
7. Criteria in para 4 are covered by Development Management policies, not justified to repeat here.	The Councils believe that the criteria are justified, and that the Local Policies within the JLP provide more detailed requirements.
8. Heritage or residential amenity not mentioned in Para 4. Remove material consideration. Should include considerations of heritage, residential amenity and design policies/guidance in NPs.	These considerations are included within the relevant policies of the JLP e.g. heritage in LP21 The Historic Environment, amenity and NPs in LP26 - Design and Residential Amenity
9. The following settlements should be higher in the settlement hierarchy: Chelmondiston, Elmswell, Great Walmingfield, Hoxne, Mendlesham, Rattlesden, Wetherden.	The Councils considers that the weighted scoring system identifies a sound basis to identify the relative sustainability of settlements.
10. The following settlements should be lower in the settlement hierarchy: Acton, Shotley, Sroughton.	
11. Need greater clarity on what constitutes Ipswich Fringe area, and why Ipswich Fringe settlements are also core villages etc.	The Ipswich Fringe is identified on the Key Diagram and covers the combined parish area of settlements listed in Table 2 and 3 of the Plan. For planning purposes, all sites and settlements within the Ipswich Fringe will be treated as the top of the hierarchy. For consistency, the settlement hierarchy methodology considered all villages on a 'policy-off' basis. The plan then identifies those that are within the planning designation of the Ipswich Fringe.
12. Point thresholds used in settlement hierarchy needs to be justified.	The Councils have used planning judgement to apply the relevant thresholds used in the settlement hierarchy review, based on what is considered to be a discernable change in sustainability credentials. Inevitably around the margins of thresholds there is less distinction, but the approach and outcome is considered proportionate and justified.
13. Reference to supporting text para 8.03 - Scoring system fails to recognise the capacity, relevance, viability and permanence of services.	Points system is used to create a proportionate, simple and transparent methodology to indicate the broad and relative sustainability of settlements. It is not considered practical to include those matters within the methodology.
14. Hierarchy should be flexible to review changes in the service provision of settlements.	Changes to service and facility provision can be reviewed through formal plan review process.

<b>SP03 – Settlement Hierarchy</b> <b>Main Issue</b>	<b>Councils' brief response</b>
15. Settlement hierarchy tables should identify Market Towns and A12/A14 settlements together as the second category of settlements.	The settlement hierarchy is used to identify the relative sustainability of settlements. The boundaries of the transport corridors are identified on the Key Diagram. The Councils do not consider it appropriate to create another category or combine A12/A14 settlements within the settlement hierarchy. This would fail to recognise the distinctions between the settlement categories.
16. Too much emphasis on settlement hierarchy in para 1, should be a more balanced approach.	Part 1 of the policy includes a number of planning considerations. The Councils believe this is appropriate. (See Q4.2 above).

#### SP04 main issues

<b>SP04 – Spatial Distribution</b> <b>Main issue</b>	<b>Councils' brief response</b>
1. Support for the Plan increasing the supply and range of urban and rural housing proposed to meet needs.	Noted
2. Support for the proportion of growth in market towns and urban areas.	Noted
3. Increase proportion of housing being allocated to Ipswich Fringe, Market Towns and Urban Areas and Core Villages	The Council's spatial strategy is considered an appropriate balance between supporting sustainable development in both urban and rural areas. The SA identifies that the Ipswich Fringe, Market Towns and Core Villages are the most sustainable locations for new growth and the majority of growth is proposed there. There is limited deliverable growth opportunity along the A140 route.
4. Reduce proportion of growth on A14 corridor villages, increasing growth in A14 towns and communities along the A140 route.	
5. Increase proportion of housing being allocated within the Mid Suffolk Ipswich Fringe.	
6. Reduce proportion of growth in the Ipswich Fringe and increase in the rural areas.	
7. There should be a greater spread of growth across all Mid Suffolk Core Villages.	
8. Increase the proportion of growth for Hamlet Villages.	The JLP and the SA have considered the opportunities for new settlements in this Plan. It is not considered the favourable spatial strategy.
9. A new settlement for Mid Suffolk is required at the outset of the JLP.	
10. A new Garden Village between Hadleigh and Ipswich should be included in the Plan.	
11. Object to 20% buffer as it is not justified.	The Councils have followed national guidance where 20% is considered appropriate to improve the prospect of achieving a planned supply – see question 3.4 (Matter 3)
12. Support 20% buffer.	Noted



<b>SP04 – Spatial Distribution</b> <b>Main issue</b>	<b>Councils’ brief response</b>
13. A greater supply of housing should be found to ensure the housing needs requirements are met.	The Councils have identified a housing land supply buffer of approximately 20% which is considered appropriate and significant to ensure that the full needs of the Plan can be met over the whole period – see question 3.4 (Matter 3).
14. The Plan should contain reserve sites for each settlement to maintain delivery.	
15. Amend Policy SP04 to state that LS01 sites should be used as an additional supply buffer where Neighbourhood Plans to not deliver.	
16. Increase in housing numbers and sites proposed for: Bacton, Bildeston, Botesdale, Boxford, Bramford, Chelmondiston, Debenham, Great Blakenham, Great Waldingfield, Hadleigh, Haughley, Holbrook, Long Melford, Mendlesham, Needham Market, Redgrave, Stowmarket, Stowupland, Thurston, Walsham-le-Willows, Wetheringsett-cum-Brockford, Whatfield, Whitton.	The Council has already identified appropriate sites to meet the overall district needs.
17. Housing requirements in Sproughton, Lawshall and Hartest should be reduced following change in local circumstances.	Site specific matters, which may have an impact on housing requirements in Neighbourhood Plan Areas, will be considered in later Hearings.
18. For Mid Suffolk Core Villages, the total homes in policy SP04 and Table 04 is inconsistent.	The tables will not match as SP04 policy table is total growth in each settlement category and Table 04 are NP housing targets based upon designated parish areas. Due to the settlement hierarchy, some villages will have areas designated in more than one settlement category. In MSDC there are 17 places which have more than one settlement category type, meaning that the growth in them will be spread over multiple categories in the settlement hierarchy. The spatial housing approach topic paper Appendix A ( <a href="#">Document EP03</a> ) sets out which settlement category each new JLP allocation is located in.
19. More allocations should have mixed uses included to offset the need to travel further distances for services and facilities.	As set out in Matter 6, the Councils have a modest quantitative employment land requirement. Therefore, the Councils do not consider it is appropriate to allocate further mixed use sites. Instead, the Councils have aligned the majority of growth to sustainable locations to ensure that key services and facilities are located as close as possible to new housing allocations.



<b>SP04 – Spatial Distribution</b> <b>Main issue</b>	<b>Councils’ brief response</b>
20. The Plan needs to be clear how the volume of planning permissions granted after the base date have been taken into account.	Most major planning permissions granted after the 2018 base date of the Plan have been recognised as allocations within the Plan. Nevertheless, planning permissions will come forward for determination while the Plan is progressing to adoption and will be recognised as windfall development. For NP areas see question 4.8 above.
21. The assumed windfall allowance is not justified - representations for both higher and lower.	The windfall allowance is justified by the evidence base and is a balance of planning judgement. Recent and current windfall rates are high, but would be expected to reduce substantially when the Plan is adopted. Overestimating the windfall supply would offer less certainty for where growth is to be expected.