

Babergh and Mid Suffolk
Joint Local Plan

06/21

**Matter 4 - Settlement Hierarchy, Spatial Distribution
of Housing and Housing Site Selection Process**

Hearing Statement on behalf of Mr and Mrs Britnell



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Introduction

1. This Hearing Statement has been prepared by JB Planning Associates of Mr and Mrs Britnell of [REDACTED]
2. Rose Farm House is a Grade 2 Listed Building. The list description describes Rose Farmhouse as being of early and late sixteenth century origin. It is timber framed and plastered and has a tiled roof. It has an eighteenth-century moulded doorway and a later nineteenth century single storey extension. The list description also refers to the property having original diamond mullions to the first floor and fine plaster ceilings with moulded panels and cornices, fleur-de-leys, and Tudor roses and bosses. There is a range of nineteenth century agricultural buildings to the west of Rose Farm House and a further range of more recent origin to the rear. Rose Farm House has shallow foundations and there are concerns that further development within the vicinity could impact upon the structural integrity of the property.
3. Our clients have made representations at both the Regulation 18 and 19 stages of the Local Plan process and have consistently argued that the amount of development proposed to the south of The Street, Shotley, is too extensive and does not respect the setting of Rose Farmhouse as required by planning law and national policy. Furthermore, the location of the site adjacent the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty gives rise to additional landscape issues which, in the absence of suitable mitigation, could have a negative effect upon the sense of openness that currently exists.
4. This Hearing Statement does not repeat those earlier representations, however in reply to the Matters, Issues and Questions posed by the Inspectors it makes the following points in relation to Policies SP03 and SP04 and Questions 4.1 and 4.10.
5. A further Hearing Statement will be submitted to the Examination in response to Matter 9 which will address the soundness of the proposed housing allocation at The Street, Shotley.

Inspectors Questions

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

Settlement Hierarchy and Housing Site Selection

6. In principle, our clients support the establishment of a settlement hierarchy to direct future growth across the Babergh and Mid Suffolk area and acknowledge that it is proposed to designate Shotley Street as a Core Village in the Joint Local Plan as a means of maintaining the viability of existing services. They do not however accept the scale of development proposed to the south of The Street, Shotley.
7. In response to the Issues and Options consultation at the Regulation 18 stage of the Local Plan process however, our clients highlighted that the use of a scoring system, which relied upon the awarding points depending upon the level of services available, appeared overly simplistic as a means of categorising settlements and did not acknowledge the physical and environmental constraints that exist in some villages as a means of establishing a hierarchy.
8. Although the Joint Local Plan has subsequently been subject to a Sustainability Appraisal, which has developed and built upon the earlier work conducted for the Issues and Options and Preferred Options Consultation documents, our clients have considerable reservations as to whether the assessment has been objective. As stated in their response to the consultation that took place at the Regulation 19 stage of the Local Plan process, the Sustainability Appraisal assesses the land to the south of The Street, Shotley, based on a development of 50 dwellings but does not consider other scenarios either higher or lower than this figure and the potential implications. The assessment process therefore appears to be biased and closed to the consideration of alternative development propositions. The Sustainability Appraisal is not clear in this regard.

9. The land identified adjacent to Rose Farm House extends to 2.96 ha, which at an assumed development density of 30 dwellings per hectare would equate to some 90 dwellings rather than the 50 envisaged by the proposed allocation. The resultant character and built form of some 90 dwellings would be substantially different and is unlikely to safeguard the sense of openness that currently exists in the area around Rose Farm House. This was a key finding of the Heritage Impact Assessment commissioned to support the Joint Local Plan. In our clients opinion a significantly smaller allocation, capable of accommodating 25 – 30 dwellings, would be more appropriate and of a scale that is commensurate with the size of Shotley Street than the amount identified by the Joint Local Plan. It would also correspond with the findings of the Heritage Impact Assessment.

10. Policy SP04 envisages that over the plan period 28% of all development will take place in the Core Villages within Babergh which is only marginally less than the 33% envisaged in the Market Towns and the Ipswich Fringe and more than the 21% proposed in the Ipswich Fringe. As indicated in our clients previous representations, the proposed housing distribution could result in a considerable dispersal of growth across Babergh leading to unintended consequences which do not promote the principles of sustainable development. This concern is highlighted in the Sustainability Appraisal which, whilst recognising that it would be neither practical nor sustainable to locate all new in the Market Towns and Urban Areas, recommended that a large volume of dispersed development across the smaller settlements should be avoided to reduce private vehicle use.

11. Shotley Street lies some distance from the national highway network (A12 / A14) and other strategic routes. Access to the national rail network is available at Ipswich and Manningtree and accordingly the village is not well served by highway and public transport infrastructure. There are continuing concerns in relation to the capacity of the B1456 (which is effectively a cul-de-sac) to serve further housing especially when consideration is given to pre-existing commitments that exist in the locality, such as HMS Ganges. Congestion already occurs at peak times at certain points along the route of the B1456 but especially in Chelmondiston where the road narrows.

12. The commitment within the Joint Local Plan at paragraph 09.07 to monitor progress is noted, however it is questionable whether this is going to be timely and effective and will address the continued misgivings that our clients have in relation to the intended spatial distribution of new housing development.

Concluding Remarks

- 13.** Our clients do not accept the extent of the proposed allocation, or the scale of development proposed for Shotley Street, which is inconsistent with the promotion of sustainable development.

- 14.** Given the statutory and national planning policy tests that apply to development within the setting of a Listed Building, the proposed allocation at The Street should be reduced in size.

- 15.** The soundness issues raised by the proposed allocation will be addressed in a further Hearing Statement for Matter 9.

