

LAVENHAM PARISH COUNCIL

FORMAL EXAMINATION OF BABERGH AND MID SUFFOLK DISTRICT COUNCILS JOINT LOCAL PLAN

Matter 4 Settlement Hierarchy, Housing Spatial Distribution and Site Selection

Further submission

Policy 09.09

The local authorities' joint plan should set a maximum housing level that can be supported by local infrastructure, without harming local character, heritage and sustainability [1]. There should be no requirement for windfall or a buffer wherever a local plan meets the local target or exceeds the identified maximum potential for planned growth.

The Joint Local Plan defines that which must be assessed by developers before considering an application. This includes heritage assets but needs to be extended to include *heritage views, important vistas, streetscape, roof-scape, impact on the settings significance and character of heritage assets in order to sustain or enhance these*.

In our submission, the JLP needs to protect heritage views, character of place and highly sensitive landscapes (especially where contained in adopted landscape character assessments, conservation area appraisals or defined AONB) against *gradual* encroachment leading to permanent loss of views. This especially applies to the use of "permitted developments" and windfall development.

We have examples of both happening regarding views into and from our village of Lavenham and so welcome the future protection of a Joint Local Plan against such encroachment.

However, we regard the current JLP as not providing any meaningful protection in this regard.

In our submission, the JLP should state that *it be read in the context of the individual listings of heritage assets, adopted conservation area appraisals, adopted local landscape character assessments, adopted guidance from Heritage England, and the up to date designation of special landscape areas*.

These should be taken by developers as **complimentary** rather than contradictory ie inclusion of a protected view in any one of these types of assessment leads to protection; in all four leads to the greatest protection.

In our experience, the above assessments work together to provide a sum of protection of heritage views, the settings for heritage assets, views to, across, out from, and within conserved areas, historic views and landscape of special or outstanding natural beauty [see Planning Inspectorate decision in 2021 on application for an eco dwelling to the rear of Lavenham Priory].

Policy statements within the JLP should not take precedence over the above assessments unless: a change in conserved or protected status is expressly stated within the JLP or there are exceptional circumstances or there are material offsetting benefits.

We also suggest the following added wording to the Joint Local Plan to bring it in line with the NPPG:

“Those developments that sustain and enhance the economic, social and environmental sustainability objectives of local communities (as per the NPPG paras 7 to 14) through

their design being sympathetic to local heritage and character

sustaining and enhancing heritage and its setting

development of local trade and employment

opening up access to heritage and protected views to a new generation

protecting and sustaining local bio diversity

and demonstrating a life time material reduction in CO² emissions by 2030 (through design, use of materials, mitigation and offsetting)

will be actively encouraged.

Those that harm the above characteristics will be actively discouraged and refused.”

Examiners questions

4.5 ... the cumulative impact of development proposals?

In our view, there is no **cumulative assessment** underpinning the JLP, not least given the reliance on windfall development and the historical pattern of approvals of unplanned developments without such cumulative assessment.

For example, in our adopted Neighbourhood Plan, we identified our school was already at full capacity. As part of that plan and the Joint Local Plan some 235-241 new dwellings are proposed and almost all are under way *since that assessment*.

Yet the adopted Infrastructure Delivery Plan only looks at the 20 new houses that are not already subject of an existing application or permission. It therefore understates the essential infrastructure now needed by the village as a consequence of new housing from 2016 (when our infrastructure was last assessed).

Further, three other proposals, two out to consultation, will see a potential windfall of 93 additional dwellings (none having any cumulative assessment of impact).

If we apply the calculation allegedly used for other places in the adopted Infrastructure Delivery Plan (ie 2.2ha of plot per 420 pupils being required) to the cumulative position, our school is *already* under-sized (and this is before the additional pupils that will follow 118 new dwellings now planned for 2022-2037).

Likewise both our medical centre capacity and our sewerage flood and drainage capacity are at or beyond maximum already, yet deemed to have low growth **because of the absence of a cumulative assessment** (rather the use of a forward looking forecast).

If Lavenham is an example of the position across both districts then there is no evidence of a **cumulative assessment** of the impact of new builds since infrastructure was last assessed. The

infrastructure requirement across the Plan appears to be considerably understated without such a cumulative assessment.

4.8 (a) ... *outstanding permissions from after 1/4/18 identified ... or do they need to be otherwise accounted for?*

(b) (iii) ... *flexibility to reflect existing permissions/housing allocations ... accounted for in the approximate 20% buffer over the housing need targets?*

It is our recommendation that as a consequence of unplanned development prior to the adoption of the proposed Joint Local Plan (2011-2021) and as a consequence of the adoption of local Plans that *overlap* with the development period of the JLP, it is imperative that the Joint Local Plan assesses the impact of what happened *before* its adoption, rather than take an unplanned and moveable position as its baseline.

This especially applies to the IDP upon which the JLP is founded.

It is our contention that over-development (in the context of a national target to reduce CO² emissions due to housing by 10% by 2030) and not *phasing* development will both have major adverse consequences:

- 1) The embodied use CO² emissions of new build outweighs any lifetime assessment benefit achieved by 2030 ie the main benefits are felt *after 2030*
- 2) The use of materials and failure to recycle and re-purpose materials as part of design statements sees the majority of build currently approved adding above average embodied use CO² emissions eg use of brickworks and uPVC when timber frame and hardwood frames have lower embodied use; and the use of Passivhaus which adds to embodied use in first ten years etc
- 3) There is no cumulative assessment of CO² emissions generated by new housing nor how mitigation will deliver a 10% reduction in emissions across all housing against a 10% increase in housing stock
- 4) Poor phasing of development will lead to new housing *before need* such that housing is diverted away from the target group for which it was designed or will lie empty (adding to the long term unoccupied dwellings in the two districts)

We recommend that those settlements that have existing plans and approvals, and that already meet the identified need for 2036, should have no windfall target.

4.9 ... *the settlement hierarchy ... [has] not been of particular significance in the selection of housing sites*

In the view of our parish, the existing plan is **opportunistic**, not relying on a settlement hierarchy nor on planned developments, rather relying on existing developments as approved or presented for approval together with windfall development. This contrasts to Neighbourhood Plans themselves which have undertaken or are undertaking the necessary infrastructure assessments, while engaging the local community in determining sites and a settlement cap for new dwellings.

It is our contention, therefore, that this JLP should not take precedence over adopted Neighbourhood Plans that have a greater local appreciation of what is achievable.

May 2021

DRAFT