

**MATTER 4 - SETTLEMENT HIERARCHY, SPATIAL DISTRIBUTION OF HOUSING AND HOUSING SITE SELECTION PROCESS**

1. This statement in respect of Matter 4 is submitted on behalf of Llanover Estate. In particular they raise concerns in respect of the spatial distribution of housing and the site selection process.

2. We conclude this statement on the basis that their sites at Redgrave and Botesdale and Rickenhall provide a means to seek to address these matters. In this regard it is intended to be supplementary to the representations submitted on the Local Plan to date.

**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?**

3. We are supportive of the overarching spatial approach, we believe that it is imperative to strike a balance between the urban and rural areas. However, we are concerned that there are discrepancies over how development is distributed, which is not based on the settlement hierarchy nor is it based on boosting the supply of housing and being positively prepared. Indeed, in most cases it seems predicated on existing planning permissions and where proposals arise rather than in seeking to genuinely increase the supply of homes. Absent sufficient evidence to support allocations, it seems inevitable that additional deliverable sites will be needed and we believe this ought to be addressed through the Local Plan review. It is noted that there are numerous discrepancies which we cover below:

4. Core Villages – we are strongly of the view that there is a mismatch in the current approach whereby some Core Villages have up to 1000 dwellings allocated regardless of their score on the settlement hierarchy, yet others have less than 100. Additional sustainable sites ought to be allocated in those settlements that score well. Indeed, Botesdale and Rickenhall is a highly sustainable location and could accommodate an increased level of growth over the plan period as set out in our previous representations (in respect of land under the control of our clients) a summary of which is included at appendix 1;

5. Hinterland Villages – there are insufficient allocations within the hinterland villages yet these areas comprise nearly 50% of the population of the authority. We consider that where there is an opportunity to allocate sites within hinterland villages and this should be taken in order to ensure comprehensive approach to diversity of housing choice and improvement of facilities and infrastructure rather than an incremental / piecemeal approach. Opportunities on our client's land at Redgrave (appendix 3) have the potential to improve the sustainability and long term viability of the village; and

6. Neighbourhood Plans – There is a significant discrepancy between the approach taken in some of the Hinterland Neighbourhood Plans. For instance, Redgrave, Thorndon, Old Newton, Laxfield and Hoxne all score similarly in the sustainability matrix yet vary massively in housing numbers proposed:

- i. Thorndon – 75
- ii. Old Newton – 141
- iii. Laxfield – 97
- iv. Hoxne – 43
- v. Redgrave – 11

7. Accordingly, the distribution of development seems arbitrary and subject to existing proposals rather than in seeking to plan to meet needs.

**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?**

8. With regards to Botesdale and Rickinghall, it is a well placed Core Village that ranks highly in the settlement hierarchy by virtue of the range of facilities that is already available. However the proposed level of growth is limited to small scale existing commitments and does not account for the potential for increased dwelling numbers that themselves could help to bolster facilities that are available to local people. Our clients site to the South of Mill Road is already delivering 69 dwellings but there is scope for it to be expanded over the plan period to provide additional dwellings and increase the range of facilities available. Indeed, further land holdings of our clients are identified as suitable within the SHELAA for delivery of housing during the plan period. Our clients would commit to submit an application on additional areas shortly to ensure that they would be available within the plan period.

9. In the case of Redgrave, if recent trends of piecemeal / backland development continues over the JLP period then we would expect there to be an additional 30 to 40 dwellings granted approval (on single plots) in addition to the 11 identified. We believe that continuing this approach to piecemeal planning in a Village such as Redgrave will ultimately harm future sustainability and viability by not providing for infrastructure, housing needs or community facilities – indeed, it will add to the population incrementally without addressing the impacts of those additional dwellings or housing needs. Rather, we are strongly of the view that a comprehensive approach is taken to meeting future requirements in a properly planned way such that future sustainability can be built in to the Plan process. We believe that it is entirely appropriate for the JLP to consider such matters that will ultimately impact upon the long term viability and sustainability of settlements within the Districts. Notably Redgrave is part of the hinterland associated with Botesdale and Rickenhall and so forms a cluster of small settlements that help to sustain existing facilities therein, in this regard it is sustainably located.

10. Given the overarching shortfall in identified supply we believe it is imperative to the soundness of the plan to ensure that additional allocations are identified in settlements such as Botesdale and Rickenhall and Redgrave. Indeed, given recent trends of office workers relocating to more rural locations driving a 20% increase in house prices it is inevitable that locations as these will become more exclusive with existing problems of affordability and ageing population simply exacerbated.

**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?

(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)?

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

(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?

11. It appears that the total homes required figures are as indicated (ie a sum of the OPP's and sites allocated). We are strongly of the view that it is appropriate for the Local Plan to go beyond these two sources where necessary rather than artificially constrain housing provision. Indeed, rather than providing the minimum amount and relying upon future mechanisms for increasing supply we are of the view that higher targets should be considered.

**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?**

12. We are surprised that the Council state that the settlement hierarchy and distribution of development between categories has not been of particular significance. This seems to be born out in the varying levels of apportionment of growth regardless of the overall sustainability score. Indeed, there are a number of Core Settlements that attract a higher level of apportioned growth than Botesdale and Rickinghall despite similar sustainability scores and despite the SHELAA identifying suitable sites.

13. For instance Botesdale and Rickinghall is just 154 units compared to its score of 24 yet:

- Bacton scores 18 but has 267 new dwellings;
- Capel St Mary scores 25 and attracts 650 new dwellings;
- Haughley scores 21 and has 192 new dwellings; and
- Woolpit scores 26 and has 694 new dwellings.

14. Proportionally there is significant variation in the number of new dwellings attributed to these as examples that doesn't appear to correspond to sustainability scores. As such and given the shortfall in supply we are of the view that each settlement needs to be revisited for sustainable opportunities to plan for new homes (along with associated facilities) rather than relying upon unidentified sites.

**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.]**

15. We are concerned that the process for assessing and allocating sites appears to be inconsistent with sites in similar locations being considered very differently. This is particularly the case at Botesdale and Rickinghall and at Redgrave.

#### **Botesdale & Rickinghall**

16. Site number SS1250 (at North of Mill Road) has been submitted by our clients and is considered in the Council's assessment to be “poorly related to the existing settlement” however it is a natural infill in relation to site allocation LA052 and in fact parts of the site are actually more closely linked to the settlement and the local facilities than allocations LA049 and LA052.

17. Furthermore, it lies across the road from our client's other site SS1248 which is indicated to be suitable for development in the SHELAA although it is not allocated for development despite it being available and our clients would be committed to its future development.

18. Appendix F of the Council's detailed Appraisal of Site Options sets out the assessment of Allocation LA052 in detail and it is considered that the same conclusions could be made for development associated with parts of SS1250 and SS1248 that would result in a comprehensive approach to this part of Botesdale and Rickenhall and would provide a modest increase in housing supply that would boost local facilities but also provide an opportunity to provide additional facilities (such as enhanced community facilities). Or extended community facilities adjacent to existing ones.

19. We are therefore of the view that a robust approach towards site assessment would have concluded that the combined sites provide an opportunity to provide a comprehensive sustainable scheme that could meet needs. Indeed, the submissions made by our client demonstrates (for consistency) how these sites could be thought of together to provide a sustainable option for growth – this has not been assessed as part of the process.

### **Redgrave**

20. Our clients have also submitted two sites at Redgrave for consideration, part of one is proposed to be allocated within the Neighbourhood Plan.

22. The other site is land at Half Moon Lane, the assessment in respect of the site is inconsistent, the SHELAA indicates it is suitable but the Sustainability Appraisal in considering the site alongside Hall Lane (LS01) (which has planning permission) indicates:

*"E.747 Overall, both sites are expected to perform similarly as they share the majority of the same major positive and major negative effects. However, site SS0818 (Land south of B1113 Hall Lane, opposite junction with Half Moon Lane, Redgrave) is likely to perform slightly better than site SS1266 (Land south of Half Moon Lane, Redgrave) because it does not have a major negative effect expected against criterion 1a (GP surgeries), 2a (Primary schools) or 9a (Transport links)"*

21. Given their locations and that the same considerations apply, it is unclear how there will be a different impact on these matters.

### **IMPLICATIONS FOR THE JOINT LOCAL PLAN AND CHANGES REQUIRED TO MAKE IT SOUND**

22. There are plainly two key issues for the Joint Local Plan that will need to be addressed in order to make the plan sound. These are:

1. Ensuring that a robust housing requirement is set that reflects local evidence and considers the entire plan period;
2. That site allocations are subject to robust assessment for their ability to deliver the necessary step change in housing provision.

23. Our clients Llanover Estate have submitted a number of sites that are unconstrained, available and capable of contributing towards the housing provision. A summary of these is included for completeness and ease appended to this hearing statement.

## *Appendix 1*

### SITE 1: EXTENSION TO ALLOCATION LA052, MILL ROAD, BOTESDALE (Site Ref SS1248 and SS1250)

Given the need to identify additional dwellings in order to meet the overall housing requirement we consider that it is highly appropriate to consider extending existing allocations in sustainable locations and have prepared options outlining the contribution that our clients wider land holding can make to meeting the overall objectives of the Plan.

Actively planning for the future is an appropriate way of addressing some of the problems that the villages are facing (in attracting and retaining young families as well as catering for an ageing population and providing facilities to cater for future needs in a logical and sustainable way) and seeking to achieve the vision and objectives of the Plan in a sustainable manner. A comprehensive approach to mixed use development can bring a range of long term sustainability benefits and we have prepared two options showing how our clients site can contribute towards the future of the village over the plan period including addressing specific needs and issues.

If our clients land is considered comprehensively then:

- It provides the potential to provide additional residential development that could include specialist accommodation for younger people / families, and for the elderly;
- it provides an opportunity for land to be provided that could accommodate a new community building in a central sustainable location adjacent to an existing facility, which could help achieve a number of the Parish's aspirations for a multi-use building for community use – which could include postal counter service, archive / museum, child youth facilities, after school clubs, indoor sports; clubs; music room, cinema screenings, and associated parking). This would significantly enhance the overall sustainability performance of the settlement in providing facilities that have been lost or have not previously been provided due to the demographic challenges; and
- It provides the opportunity for green infrastructure and formal recreation space to be included that could include formal play facilities as part of any wider review of open space and improve biodiversity.

We consider that this would give rise to a more sustainable outcome for the villages of Botesdale and Rickenhall.

### **The site**

Our clients site comprises parcels that straddle Mill Road, one of the local corridors used by villagers with direct access to the Village centre. It comprises:

- Land between Mill Road and Diss Road including proposed allocation LA052 which has outline planning permission for up to 69 dwellings. This parcel comprises around 13.5ha and is bound by existing residential development to the west and a substantive hedgerow to the east; and
- Land to the south of Mill Road comprising c.8 ha which is bound by existing residential development to the west and south and Bridewell Lane which wraps around to the south and east.

The site occupies a sustainable in close proximity to a variety of key services and facilities, bus services and links to a wide range of destinations. There is a primary school, doctors, dentist and a range of shops (including a convenience store) all within easy walking distance of the site.

The site was submitted as an option as part of the August 2017 and in the September 2019 consultation. Further work has been undertaken since then on the contribution that it can make:

#### **Short term Opportunity – potential extension to application ref. 17/02760**

An initial option for the extension of land south of Diss Road has been prepared and comprises:

- c.2 ha of additional land to the north and south of the existing planning consent (comprising parts of site ref SS1250 and SS1248) which has the potential to provide an additional 40 to 60 dwellings (including land to the north which has now been removed from the *Cordon Sanitaire*\*);
- potential to provide specific accommodation for the elderly and / and or young families in line with the evidence base;
- an additional 0.19ha of Public Open Space; and
- vehicular access via the existing consented scheme with further footpath links.

*(\*The former exclusion zone related to the existing pumping station on Diss Road was originally considered to be 400m but has been confirmed at 80m which makes that part of the site between Diss Road and the permitted scheme suitable to come forward early with infrastructure shared with the Bennett Homes scheme where reserved matters applications were submitted nearly 12 months ago. – providing a ready accessed and serviced site for that allocation to be extended with rights reserved.)*

#### **Longer term opportunity – potential wider extension to application ref. 17/02760**

An alternative and larger area of land has also been identified that could provide for the longer term needs of the community and would allow for additional provision of resources. This includes the following that we propose would be phased according to need over the course of the Plan to 2036 (and beyond if required):

- c. 11 ha of additional land to the south and east of the existing planning consent;
- potential to provide a mixture of housing and employment to meet future needs;
- a long term comprehensive approach to the future sustainability and viability of the communities;
- potential to provide specific accommodation for the elderly and / and or young families in line with the evidence base;
- 3.4 ha of potential open space and c. 2.5ha of land potentially set aside for community / recreation uses;
- a financial contribution towards the construction of a new community focussed building;
- vehicular access via the existing consented scheme and existing routes along with further footpath/cycle links; and
- a self-contained development area which would not increase traffic through the villages, preserving the existing character.

*Appendix 2***SITE 2: LAND AT HALF MOON LANE, REDGRAVE (SS1266)**

Our Clients control land at Half Moon Lane in Redgrave. It is located adjacent to land controlled by the Parish Council (the former school playing fields). Given the need to identify additional dwellings in order to meet the overall housing requirement across the District, we consider that it is highly appropriate to allocate additional land in sustainable locations such as this and redraw the settlement boundary accordingly.

The site, is located on the south eastern edge of Redgrave, with existing residential properties to the north west (all off Half Moon Lane which runs along the north and west). The western element is owned by the Parish and the northern and eastern part is controlled by our clients Llanover Estate. To the south east and east are existing fields and woodlands. Surrounding residences are generally low density, detached cottages and 1970's style bungalows set in large plots. There are two thatched cottages to the north of the site that are both listed.

It is proposed that together with or excluding adjacent land owned by the Parish Council (included within the site boundary), this site provides an opportunity for a small scale residential development (which may include self build units) that could meet local needs and respect the overarching requirements of the Conservation Area. Whilst the site currently forms a small part of the wider SLA buffer planting, it has a different character and design considerations can be provided to minimise impact as confirmed in the Council's Landscape work.

It is expected that access would be provided from the northern section of Half Moon Lane (adjacent to Half Moon Cottage).



### *Appendix 3*

#### **SITE 3: LAND AT CHURCHWAY, REDGRAVE**

Our Client's site comprises parcels both to the north and south of Churchway, which links St. Mary's Church, to the east and the village 'green' to the west within the heart of the village. It is located on the eastern side of Redgrave and comprises three distinct areas:

- an area of land to the north of Churchway adjacent to a more recent development (Llanover Estate / Hastoe Housing) of five affordable housing units;
- the recreation and playing fields with the amenity hall and car park to its north eastern corner; and
- agricultural land to the south of Churchway, with a wooded belt on the eastern field boundary.

The site as a whole is bound by the existing village to the north, west and south with agricultural land comprising the remaining boundaries. It occupies a sustainable location that is commensurate with the role of the village. Indeed, within the site is located the amenity hall which is a focus for local clubs, sports, arts and social events along with the sports grounds and a play area. Within 100m of the boundary of the site lies the Cross Keys Pub (which has recently been taken over by the community and is expected in future to incorporate the community shop), the existing village shop, the village green and bus stops. Bus service 304 stops at The Street, approximately 400m from the development, and runs to Bury St Edmunds and Diss. Greater Anglia trains operate services from Diss to Norwich and London Liverpool Street. The employment area at Hall Farm belongs to the estate and lies to the east of the site. as does St Mary's Church another community asset – a local museum and performance space.

The Neighbourhood Plan seeks to allocate a small area of our clients site for housing (8 dwellings) along with retention of the current open space within our clients ownership. Representations have been made to the Neighbourhood Plan process indicating that 8 dwellings is insufficient in viability and (it has to be reasonably related to the scale of development proposed) terms to enable the retention of the open space and that the level of development should be increased.

The lease on the open space is due to expire in September 2021 and our client has served notice of the Redgrave Amenity Trust which will require the land to revert to Llanover Estate. It is our clients intention that the land will revert to agricultural as a more economic use of its holdings as it is a valuable asset with suitable alternative use and could form part of a successful farming enterprise and local employer if their proposals are not taken forward.

Our Clients have prepared a Development Framework Document (DFD) that has been submitted to the Council which sets out how proposals could be taken forward. The DFD is based on providing a genuinely sustainable option of:

- a phased residential development to include an element of smaller house sizes of varying types and tenures including for the elderly, downsizers, starter homes and for young families (as set out in the SHMA); and
- safeguarding of a reconfigured recreational ground and a phased transfer of ownership of



the recreation ground and areas of public open space, including the Amenity Hall and Changing Rooms, the car park, sports pitches, footpaths and play area, to the Parish Council and / or Redgrave Amenity Trust That is reasonably related to the scale of development.

With regards to the contribution towards housing numbers the DFD suggested that the following densities/ housing numbers could be achieved in a phased manner (with phases 2 and 3 falling into subsequent plan periods unless there was a need within the current plan):

- **Phase 1 (c.0.9ha):** up to 20 dwellings (to include an element of bungalows) proposed timescale 2021-2036 with, alongside this, subject to agreement transfer of part of the revised recreation ground with a licence on areas proposed for future development phases;
- **Phase 2 (c.0.8ha):** 10 to 20 dwellings with a proposed timescale post completion of Phase 1, including the transfer of a second portion of the revised recreation ground; and
- **Phase 3 (c.1.4ha):** 15 to 30 dwellings beyond completion of Phase 2 with the transfer of a corresponding area of the revised recreation ground.

The DFD sets out more detail in respect of phasing and provision of open space. It suggests a mechanism for transferring ownership of the recreation area to the community over the longer term associated with each phase if there is a desire to retain the recreation ground as a facility in the long term. This would provide for a phased transfer of ownership to the community.

There are no restrictions on development and releases can be programmed to suit the identified need such that all of the site could be provided during the current plan period or, more probably, with each phase falling into subsequent five year or development plan periods. As noted our Client had envisaged that the current neighbourhood plan would release only phase 1 however there is a strong case for phase 2 to be considered as a reserve site in order to meet needs and to facilitate the likely benefits envisaged.

Our Client very much favours a long term and comprehensive approach that reflects the fact that our Client has been a major land owner locally for a considerable time and plan ahead long term identifying and protecting a vision in respect of their own holdings to ensure it is delivered in its entirety rather than *ad hoc* piecemeal releases without a properly planned structure as appears to have been the pattern for releases in Redgrave in recent years. Indeed, over the past 10 years there have been around 30 incremental dwellings built providing little in terms of community benefit, affordable housing and general sustainability.

We are strongly of the view that rather than continuing the trend of *ad hoc* development in the village absent associated infrastructure and community provision, a comprehensive approach should be taken.