



## **Babergh Mid Suffolk Joint Local Plan**

### **Examination Hearing Statement**

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

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**Prepared by Strutt & Parker on behalf of M Scott Properties (Respondent ID 4945, 6775,  
7064))**

**June 2021**

## **1. Introduction and Background**

- 1.1 This hearing statement is made by Strutt & Parker on behalf of M Scott Properties Ltd ('Scott Properties'). Strutt & Parker made representations on the Regulation 19 (Pre-Submission) iteration of the Babergh Mid Suffolk Joint Local Plan (JLP) on behalf of M Scott Properties Ltd ('Scott Properties') ('Regulation 19 representations'). These representations were duly made and Scott Properties was assigned respondent IDs 4945, 6775, 7064.
- 1.2 Scott Properties is actively promoting a residential-led development of Land south-west of Rembrow Road, Capel St Mary ('the Site'), which the JLP proposes be allocated for approximately 550 dwellings and 5,000m<sup>2</sup> of employment floorspace (with associated infrastructure) through Policy LA055.
- 1.3 Scott Properties is, at the time of writing, at an advanced stage in the preparation of a planning application in respect of proposed development of the Site, and it is anticipated that an application will be submitted imminently and prior to completion of the JLP Examination. Discussions have been ongoing with the Council's Development Management and Policy teams in respect of the Site for some five years, as the JLP has progressed.
- 1.4 This hearing statement concerns Matter 4 (Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process) of the JLP Examination.
- 1.5 As requested, this Hearing Statement seeks to avoid repeating points already made in the Regulation 19 representations (but highlights particular elements of these representations where relevant). As such, this hearing statement should be read in conjunction with our Regulation 19 representations.

## 2. Response to Matter 4

**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?**

- 2.1 As set out in our Regulation 19 representations (paragraphs 3.1 – 3.23), we consider the JLP's spatial distribution of housing to be justified, effective and consistent with national policy, insofar as it concerns the approach to Capel St Mary.
- 2.2 In overview, and when one considers that there are 15 Core Villages in Babergh, and only 3 Market Towns / Urban Areas, it is clear that the JLP is proposing the Market Towns and Urban Areas will experience the greatest levels of growth, and proportionate levels of development will be directed to Core Villages. As noted in our Regulation 19 representations, critically, the JLP's distribution of growth does not rigidly follow the settlement hierarchy. Such an approach would be overly simplistic and risk failing to account for wider sustainability factors. Rather, it is evident that the settlement hierarchy has, entirely appropriately, formed one component of a strategy that has also accounted for the results of an objective settlement hierarchy review, but also accounted for other considerations.
- 2.3 As requested, we seek to avoid repeating the detail of the points made within our Regulation 19 representation here. In summary, however, we consider that the JLP's strategy in respect of Capel St Mary is justified having regard to:
- Capel St Mary's position in the settlement hierarchy (Core Village), established through an objective assessment of settlements in the Districts (see BMSDC Settlement Hierarchy Review November 2020 (EP01));
  - The social, environmental and economic impacts of a spatial strategy which includes an element of growth focussed along the A12 and A14 corridors, as evidenced by the JLP Sustainability Appraisal (SA) (A02 and A03).
  - The social, environmental and economic impacts of directing the level of growth proposed by the JLP to Capel St Mary, as evidenced by the SA.
  - The suitability, availability and achievability of potential development sites to deliver growth and ensure the strategy for Capel St Mary is effective, as evidenced by the Strategic Housing and Economic Land Availability Assessment (SHELAA) (October 2020) (EH06).

- 2.4 The role of the SA is an important one in plan-making, as recognised by the NPPF<sup>1</sup> and PPG<sup>2</sup>. Its support for the JLP's approach to Capel St Mary is very relevant.
- 2.5 In overview, the JLP has considered Capel St Mary not only in respect of a standardised, objective, somewhat simplistic, assessment used to determine the settlement hierarchy; but also factoring in a more sophisticated consideration of the geography of the District, how the settlement fits in to this, the impacts of directing growth to Capel St Mary, and the ability for such growth to be delivered. Such characteristics of Capel St Mary include it being the only settlement in Babergh District which benefits from a variety of existing services and facilities and where there is opportunity to deliver a significant number of new homes, which is within 1km of the A12 but outside of the Dedham Vale Area of Outstanding Natural Beauty.
- 2.6 The JLP's resultant approach to Capel St Mary is patently a suitable one, justified by evidence.

**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.]**

- 2.7 The approach taken by the JLP to considering potential site allocations and the evidence used to justify the approach includes an appraisal of options through SA (A02 and A03), as well as assessment of sites through the SHELAA (EH06). This mirrors the approach taken by many Local Plans that have gone before the JLP, and found to be sound.
- 2.8 The NPPF and PPG stress the importance of Sustainability Appraisal in the plan-making process, as noted in our response to Question 4.6.
- 2.9 The PPG similarly confirms that the assessment of housing land availability is important evidence for use in plan-making<sup>3</sup>.
- 2.10 As such, we consider that the approach is appropriate in principle.
- 2.11 As set out in our Regulation 19 representations (paragraphs 5.57 – 5.59), we do consider the SA of the Site has been overly negative. However, this does not mean that the overall

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<sup>1</sup> Paragraph 32

<sup>2</sup> Paragraph: 037 Reference ID: 61-037-20190315

<sup>3</sup> Paragraph: 001 Reference ID: 3-001-20190722

process is not robust, particularly where it concerns sites that are proposed to be allocated.

- 2.12 We consider that the Site's allocation is justified by robust evidence, and the reason for its selection explained as per the requirement of the The Environmental Assessment of Plans and Programmes Regulations 2004. However, we appreciate that this is to be considered as part of Matter 9 of the Examination, at which we will address this in detail.