

## **HEARING STATEMENT FOR**

# **BABERGH AND MID SUFFOLK JOINT LOCAL PLAN EXAMINATION**

## **MATTER 4: POLICIES SP03 AND SP04**

### **PERSIMMON HOMES (SUFFOLK) LTD**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

**Word count: 1,099**

---

## CONTENTS:

Page No:

<b>1.0 Introduction .....</b>	<b>1</b>
<b>2.0 Matter 4 – Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process .....</b>	<b>1</b>

---

## **1.0 Introduction**

- 1.1 This Hearing Statement has been prepared by Persimmon Homes (Suffolk) Ltd (PHL) in the context of the promotion of Land north east of Frog Hall Lane, Hadleigh and Land east of Longfield Road, Capel St Mary, which is allocated for residential development under Policy LA028 and Policy LA054 respectively of the emerging Local Plan.
- 1.2 This Hearing Statement should be read in conjunction with representations made at previous stages of the Local Plan preparation, including the representations submitted by PHL to the Regulation 19 public consultation on the Pre-Submission Local Plan in December 2020. This Hearing Statement has been prepared following a review of the submitted evidence base. The responses are based on the plan as submitted (A01).

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

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

- 2.1 PHL has no issue with the identified settlement hierarchy. The Councils have clearly set out in the Topic Paper – Settlement Hierarchy Review (EP01, November 2020) the evidence that has been collected and the methodology utilised to 'rank' settlements by giving scores based on accessibility to important services and facilities. PHL considers that a robust and sound process has been followed by the Councils in designating the most sustainable locations at the top of the settlement hierarchy. This allows development to be proportionately dispersed across the settlement hierarchy, in line with the settlement's ability to support additional growth. It must however be appreciated that the sustainability of a settlement can be bolstered as a result of new development, through either the provision of new services or by increasing custom of existing services and facilities.

---

2.2 In particular, PHL supports the designation of Capel St Mary as a 'Core Village' which is in line with the settlements sustainability and capacity to support new growth. There is also no doubt that Hadleigh should be designated within the 'Babergh Market Towns and Urban Areas' category; the market town contains an extensive range of services capable of meeting the day to day needs of residents and is capable of supporting growth of a major scale.

*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?*

2.3 This question is for the Councils to answer in terms of whether it is clear how the policy is to be applied. However, PHL does wish to note that criterion 1 of Policy SP03 is not considered to be sound as currently written. The final sentence introduces a restriction against new development that 'would lead to visual or physical coalescence of settlements.' Visual coalescence is a highly subjective and vague term, and no definition is provided in the Local Plan in either policy or supporting text. While physical coalescence is a more readily understood notion, the policy wording here is again vague. It is therefore not clear how the policy would be applied in a consistent manner across planning applications and is considered to be ineffective and unsound.

2.4 **PHL remains of the view that the policy can be made sound by amending criterion 1 of Policy SP03 to remove the final line, deleting reference to visual or physical coalescence.**

*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?*

2.5 Criterion 3 of Policy SP03 requires exceptional circumstances to be demonstrated for development located outside of settlement boundaries in isolated locations. Further clarification is required in the policy wording to identify the circumstances that would comprise exceptional circumstances to ensure the policy is in accordance with paragraph 79 of the NPPF.

---

2.6            Additionally, the policy must also clarify what is meant by 'isolated location'. A site cannot be considered isolated solely by virtue of being located outside of a settlement boundary. A site could be located outside of but adjacent to a settlement boundary for example, and could reasonably be considered to be in a sustainable location with good access to the services and facilities located inside that settlement.

*4.10 Have the housing sites allocated in the plan been selected against possible alternatives using a robust and objective process?*

2.7            This question is answered in relation to Land north east of Frog Hall Lane, Hadleigh (allocated under Policy LA028) and Land east of Longfield Road, Capel St Mary (allocated under Policy LA054) only. Both sites were contained as proposed allocations in the Regulation 18 Preferred Options (B09, July 2019). As requested by the question, this answer focusses on the overall approach towards site selection rather than site specifics.

2.8            The decision to propose allocation of the sites was underpinned by an extensive evidence base. The Inspector is directed towards the Sustainability Appraisal (B07, June 2019) and Sustainability Appraisal Addendum (B08, July 2019), which appraise the proposed allocations against the relevant sustainability objectives. The SA's explain how and why certain sites were filtered out through the sustainability appraisal process, including alternative sites.

2.9            The sites were also assessed in the SHELAA (EH06, October 2020) in accordance with the methodology to determine suitability for development, availability and achievability. LA028 was assessed under the site reference SS0298 and LA054 under the site reference SS0251. The SHELAA assessment concluded that both sites were suitable for residential development taking into account relevant constraints. The SHELAA also contains, at Appendix E, a schedule of all discounted sites. The SHELAA states that the SHELAA methodology has determined these sites as not being suitable and have thus been discounted. The reasons for discounting these sites is set out in Appendix E.

---

2.10 It is considered that the Councils have gone through an appropriate and robust process in identifying Land north east of Frog Hall Lane, Hadleigh and Land east of Longfield Road, Capel St Mary as the most suitable and sustainable sites for allocation. This comprehensive process has included the assessment of alternative sites, which have been assessed through the same methodology and have been discounted for appropriate reasons.