

## **Hearing Statement. Ian Poole. Places4People Planning Consultancy**

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

#### **Inspector's Question 4.8**

The base date of the Joint Local Plan has led to a number of inconsistencies in terms of the individual Neighbourhood Plan Housing Requirements. I have been involved in the preparation of a third of the Neighbourhood Plans listed in Table 04 and therefore have considerable knowledge of the difficulty that neighbourhood plan groups are having in understanding the determination and application of these requirements.

The table does not generally reflect the situation on the ground as there have been many instances of additional planning consents since 1 April 2018 that are not taken account of in the overall requirements. The District Council has not provided information as to what the exact situation is in the neighbourhood areas and the table does not indicate how many of the required homes have already got planning permission. The actual situation is that, in many instances, the minimum requirement has already been met through planning consents granted post 1/04/2018.

It is noted that, in relation to planning consents expiring during the lifetime of the Plan, Neighbourhood Plans are expected to identify how the corresponding number of homes can be found. However, the paragraph (09.11) does not identify what a Neighbourhood Plan should do where a site is allocated for development in the Joint Local Plan has subsequently been refused planning consent, including on appeal. These circumstances are known to have occurred at Sproughton, Bentley and Copdock & Washbrook.

Overall, it is disappointing that the Joint Local Plan has sought to identify every site in Neighbourhood Areas that is required to deliver the minimum housing requirement. It leaves no flexibility for Neighbourhood Plans to decide locally where and how the requirement should be met, especially in non-strategic situations such as those sites allocated in Policy LS01.

Table 04 is now considerably out-of-date in terms of Neighbourhood Areas. In order to be compliant with the NPPF it is considered that it is brought up-to-date to include those Areas that have been designated since the Plan was submitted for examination. There should also be a statement in the Local Plan to set out how the minimum housing requirements for new Neighbourhood Areas will be determined and that this approach should be subject to consultation before the Local Plan is adopted.

