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**PLANNING**

**Document:** Hearing Statement - Examination of the Babergh and  
Mid Suffolk District Council Local Plan Review  
(2018-2037)

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

**Client:** Taylor Wimpey UK Ltd.

**Date:** May 2021

# **Hearing Statement**

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

**Statement on behalf of Taylor Wimpey UK Ltd. in relation to sites at:  
Debenham; Needham Market; Elmswell (LA066); and Stowupland (LA078)**

**Examination of the Babergh and Mid Suffolk District Council Local Plan  
Review 2018-2037**

**May 2021**

## 1. INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of our client Taylor Wimpey UK Ltd. in respect of Matter 4 Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process (Policies SP03 and SP04) of the Inspector's "Matters, Issues and Questions" for the Examination of the Babergh and Mid Suffolk Joint Local Plan.

1.2 The Statement is intended to assist the Inspector's review of the questions raised in Matter 4, which is due to be considered for the discussion at the Examination Hearing session on Thursday 24<sup>th</sup> June 2021.

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

1.3 No comment.

***Question 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?***

1.4 No comment.

***Question 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?***

1.5 No comment.

***Question 4.4 Are the criteria of policy SP03(4a-c) of relevance to the Settlement Hierarchy and do these relate to issues covered by other policies of the plan?***

1.6 No comment.

***Question 4.5 Is there sufficient clarity as to whether policy SP03(4d) concerns the cumulative impact of the various effects of an individual development proposal or the cumulative impact of more than one development proposal?***

1.7 No comment.

**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?**

- 1.8 Whilst it is considered that SP04 is mainly consistent with national policy, it is suggested the policy is not effective.
- 1.9 Paragraph 09.07 identifies that the spatial distribution of housing seeks to secure a balance of growth in the strategic transport corridor area, as well as ensuring other market towns and rural communities' benefit from appropriate growth. Whilst Taylor Wimpey supports the strategic growth in Transport Corridors; Core Villages and Market Towns, it is questioned why there remains such a high level of reliance on smaller settlements and windfall sites.
- 1.10 Paragraph 72. of the NPPF identifies *"The supply of large number of new homes can often be best achieved through planning for larger scale development, such as new settlements of significant extensions to existing villages and towns, provided they are well located and designed and supported by the necessary infrastructure."*
- 1.11 It is noted in several other representations that the settlement hierarchy and housing distribution should be inextricably linked. It is therefore suggested the policy could be improved by allocated additional housing growth to Market Towns and Core Villages to enable the effectiveness of Policy SP04 and support the strategic importance of the transport corridor.
- 1.12 From the Services and Facilities Matrix core document (EP01), it is clear that certain villages (like Debenham) score strongly by offering a wide range of facilities and services, including: a High School; Primary School; leisure centre; and doctors surgery. What is therefore unclear is why these villages, such as Debenham, are scheduled to deliver fewer houses compared to other similar Core Villages in Mid Suffolk. (Please see Core Village table below highlighted for comparison).

Mid Suffolk Core Village	Score	Houses allocated in JLP
Bramford	22	304
Claydon with part Bramford	26	670
Debenham	25	245
Elmswell	29	354
Haughley	21	225
Mendlesham	19	75
Stowupland	23	461
Stradbroke	26	215
Thurston	30	999
Woolpit	26	699

- 1.13 Having key services, such as a high school and a leisure centre, generally means there is a greater ability for sustainable travel. These key services, together with a potential for increased home working, means that settlements like Debenham should be a far greater focus of future growth in the District. Rather than leaving the housing allocation to existing Neighbourhood Plans, it is suggested that the Joint Local Plan should be taking a proactive approach to identifying sites or targets for more sustainable locations, such as Debenham or Needham Market.

***Does the distribution appropriately reflect the Ipswich Strategic Planning Area-wide growth objectives?***

- 1.14 It is considered that the objectives for the ISPA have been positively prepared. The starting point for each Ipswich Strategic Planning Area authority will be to meet their own needs within their own boundary. Taylor Wimpey's Wolsey Grange site, allocation LA013, therefore contributes to Babergh's housing need and it is appropriate for the Ipswich Fringe to act as a focus for development.

***Question 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?***

- 1.15 It is considered that Policy SP04 is not sufficiently clear, and that there is an element of ambiguity, which is contrary to NPPF paragraph 16 d), especially amongst the provision of development in Neighbourhood Plans.
- 1.16 It has been noted from other representations, that Policy SP04 lacks clarity on what proportion of the new home requirements have already been granted planning permission after the 1<sup>st</sup> of April 2018.
- 1.17 In conformity with numerous other representations, it is therefore suggested that Table 04 is revised to include 'minimum' housing requirements for all parishes, ultimately providing robust evidence of whether the new allocations conform with the spatial distribution written in Policy SP04.

***Question 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?***

- 1.18 It is not clear if the "total homes required" are the sum of outstanding planning permissions + allocations, as there are instances where an additional amount of housing to be found. Table 04 of the Joint Local Plan should make this clear.
- 1.19 Equally, it is suggested that Table 04 should also make it clear that the total homes required for Neighbourhood Plan Areas are minimum figures. This

would then be in conformity with the wording of Policy SP04 for settlements *“Neighbourhood Plan documents can seek to exceed these requirements, should the unique characteristics and planning context of the designated area enable so”*.

**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?**

1.20 No comment.

**(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?**

1.21 Although generic, paragraph 09.12 identifies the need for a corresponding offset number of dwellings to meet the total requirement. With reference to the Needham Market Neighbourhood Plan paragraph 3.6 *“...of those allocations, only one site identified does not currently have the benefit of planning permission although an application is outstanding.”*

1.22 Currently, there is no provision for the strategic long-term approach to sustainable development in Neighbourhood Plans within Policy SP04. Therefore, the reliance of Neighbourhood Plans on the Joint Local Plan for housing allocations is highly unjustified, and potentially flawed.

1.23 It is suggested that the Joint local Plan has not gone far enough in terms of making important, long-term, strategic decisions for its highly sustainable settlements. The strategy for overcoming non-delivery has not been presented clearly or logically. The National Planning Policy Framework Paragraph 13) states that *“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”*.

1.24 With reference to the wording for Policy SP04 *“All identified home numbers are minimum figures”* it is considered that where possible the Policy should be adjusted to be effective and comply with National Policy.

***Question 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?***

1.25 No comment.

***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.]***

- 1.26 It has been noted that there are a number of representations from other parties which bring into question the robustness of the site selection (SHELAA) process. Paragraph 3.7 of the SHELAA states that “All discounted sites have been subject to an assessment using the methodology of the SHELAA”.
- 1.27 Based on the evidence available it appears that none of the discounted sites have benefitted from a published assessment in accordance with the SHELAA Methodology.
- 1.28 For example, Taylor Wimpey’s site off Barking Road, Needham Market (reference SS1070) was considered potentially suitable for residential development with an estimated dwelling yield of 120. It is uncertain why this was not taken forward for allocation especially considering Needham Market is a ‘town’ in the Settlement Hierarchy, which after Ipswich Fringe is considered the most sustainable location for growth. This is further supported by the fact that all other settlements can score 2 points if they are within 3.1 miles of a town, and therefore Needham Market should be a focus of significantly more growth than the Core Villages.
- 1.29 The above scenario would therefore question if suitable alternative sites have been properly and robustly assessed, which needs to be properly justified.

***May 2021  
JBPL***

