

Ref: GA/DJ/04019/L0003

1<sup>st</sup> October 2021

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Sent by email to [annette.feeney@baberghmidsuffolk.gov.uk](mailto:annette.feeney@baberghmidsuffolk.gov.uk)

Dear Ms Feeney,

**Additional Representations to Matter 4 (Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process)  
On behalf of the Hopkins Group**

At the Matter 4 Preliminary Hearing Session on 21st July 2021, the Inspector requested additional work from the Council with respect to the settlement hierarchy and spatial strategy. On behalf of our clients, Hopkins Homes Limited and Hopkins & Moore (Developments) Limited (the 'Hopkins Group'), we wish to make representations to this additional work that was published by the Councils on 10<sup>th</sup> September 2021. These representations, which are set out in this letter, build on our client's previous representations and hearing statements and concern:

- The proposed changes to the wording of Policies SP03 and SP04;
- The publication of a SHELAA Assessment for our client's site in Hadleigh (ref SS0192); and
- The additional evidence presented on the Spatial Strategy with respect to Boxford.

**Changes to Policy Wording**

In the Council's review of JLP Policies SP03, SP04 and LP01 (reference H30), several changes to the wording of Policies SP03 and SP04 are suggested.

***SP03 – Settlement Hierarchy***

Our client supports the proposed changes in so far as they resolve comments we previously made with respect to:

- The need to delete reference to visual coalescence at SP03(1); and

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- The need to amend SP03(3) to accord with national policy by deleting “exceptional circumstances test”.

In response to the Inspector’s request for the Councils to make it clear that Policy SP03 only applies for development management on windfall sites, the Council has added paragraph 08.05 which states that “*All windfall planning applications should be considered with regard to the criteria as set out in Policy SP03*”. We support this addition, but object to the deletion of the following text from the policy: ***~~“New allocations are included within the defined settlement boundaries”~~***. This deletion confuses matters with respect to the principle of development being acceptable on allocated sites and therefore renders the plan ineffective and unsound.

#### ***SP04 – Housing Spatial Distribution***

The Inspector also requested that the Councils simplify the wording on Neighbourhood Plan Areas so that it is clear what the total number of homes that must be provided is. We previously commented that Policy SP04 is far from clear with respect to when Neighbourhood Plans will be required to identify new allocations as the JLP allocates the full quantum of development required in most instances. The proposed new wording states:

***“Neighbourhood Plans will need to make provision for the requirements, through any combination of allocations (from either this Plan or the relevant Neighbourhood Plan) and outstanding planning permissions.”***

This text fails to provide the required clarity for Neighbourhood Plans as it doesn’t specify whether the JLP allocates the full quantum of development required in NDP areas or not? If it does (which it appears to in most instances), the JLP should simply be amended as follows. We also object to the wording “*should the unique characteristics and planning context of the designated area enable so*” as unnecessary:

*In order to assist with delivery of the overall district housing need requirements, **the JLP allocates development sites in** designated Neighbourhood Plan areas ~~will be expected to plan~~ to deliver the minimum housing requirements set out in Table 4. Neighbourhood Plan documents can seek to exceed these requirements, ~~should the unique characteristics and planning context of the designated area enable so.~~*

#### **SHELAA**

At the Matter 4 Preliminary Hearing Session on 21st July 2021, the Inspector rightly requested that a full assessment of discounted sites in the SHELAA be published. We previously raised concern regarding the assessment of our client’s site at Land West of Peyton Hall, Hadleigh (reference SS0192) which the SHELAA discounts due to it “not being consistent with the existing settlement pattern or character”, despite providing no assessment or justification for this conclusion, such that it cannot be considered a sound judgement.

The Council has now published a SHELAA assessment for SS0192 which concludes that it is not suitable due to it not being “*consistent with existing settlement pattern and character.*” The assessment also scores the site negatively due to “*No core services are within the preferred 800m/10min walking distance*”. We have already set out in detail in our previous representations our response on the settlement pattern and character. In summary, Hadleigh has developed organically over many years and there is no clear settlement pattern or form. This is particularly evidenced by development to the north and east of the Town which has been allowed to significantly expand such that the western edge of the town is far closer to the town centre than the eastern edge. Development on our client’s site would therefore help to balance the settlement pattern so that new development is located closer to the high street. In this respect we also disagree with the Council’s assessment

of the site with respect to the accessibility to core services as the High Street with all its facilities and services is just 650m walk from the edge of the site.

## **Spatial Strategy**

The Inspector raised a concern on 21<sup>st</sup> July 2021 regarding the transparency of how decisions had been made on the number of dwellings allocated to each tier in the hierarchy and each settlement. The Council has produced new evidence in response to this concern contained in the Spatial Distribution Statement (reference H31). In our client's previous representations, we made the case that Boxford should be allocated additional dwellings to ensure that the spatial strategy's focus on higher tier settlements and supporting growth in sustainable locations in rural areas and on transport corridors is met.

The Spatial Distribution Statement sets out that *"the Ipswich Fringe, Market Towns and Urban Areas and Core Villages categories will take the largest levels of growth"* and that *"all settlements within each category are not equal, and there will be some variance in levels of potential for growth dependent upon a number of factors, including the availability of suitable development sites, infrastructure capacity and considerations of the built and natural environment."*

Boxford is a Core Village in Babergh, but is identified in the Spatial Distribution Statement as having just 6 'plan dwellings' between 2018-2037 and 66 dwellings on extant commitments. This compares to an average of approximately 200 dwellings in each of the Babergh Core Villages. We recognise that not all Core Villages are equal and that primary school capacity constraints have been identified in the village, but would highlight the following points made in our client's previous representations:

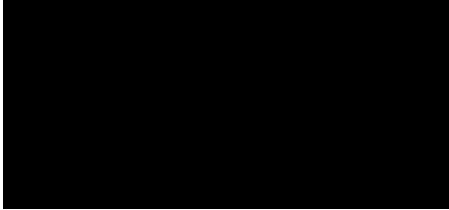
- Primary school capacity should not be used as a reason to prevent suitable levels of growth as for the recent application for 64 dwellings in the village the County Council were satisfied that capacity would increase in the future as a lot of the school roll is filled by children from out of the catchment and in future years children in these areas could be directed to other schools.
- Additional growth will support other facilities and services in the village. To ensure the Local Plan's spatial strategy of ensuring that rural communities benefit from appropriate growth is effective, it is important that the sustainability of Boxford is reconsidered and more allocations are made in the village.
- Boxford is located on a transport corridor (contrary to the Council's assessment). It is on the A1071 Sudbury-Hadleigh-Ipswich corridor which is a key route connecting more rural parts of the district and Boxford's location on this route heightens its importance as a Core Village providing services to the wider rural area.
- Hopkins & Moore completed a housing market assessment for Boxford in February 2018 which identified a requirement to deliver 205 new homes in the village in the period 2014-2036, to meet demand. The development of 25 dwellings on land east of Boxford Court (B/14/01259), the development of the 13 allocated dwellings and the recent approval of 64 dwellings at East of Sand Hill (DC/20/00330) will contribute 102 dwellings. There remains a need for an additional 103 dwellings in Boxford which is outlined in the housing needs survey.

It is therefore essential that additional allocation are made in the Joint Local Plan. In this respect, we consider that our client's site at Land west of Sand Hill, Boxford (reference SS0292) is entirely suitable, available, and achievable, and is therefore considered deliverable and developable, in line with the aspirations of the NPPF. The development of this site would represent an entirely appropriate and proportionate extension to Boxford,

and its allocation would ensure the delivery of a sustainable quantum of housing to secure the viability of Boxford as a Core Village.

We trust that these comments will be given the due consideration and look forward to participating further as the Local Plan examination progresses. Should you have any further queries or questions then please do not hesitate to contact me.

Yours sincerely



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**Director**

**Armstrong Rigg Planning**

