

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

## **MATTERS AND QUESTIONS**

Examination Statement

On behalf of Mr T  
Richardson

May 2021

## **Matter 5 – Local Housing Policies**

### 5.1 a) Are the requirements of policy LP01 clear and consistent with national policy? Would they be effective?

The spatial strategy rightly focuses the bulk of growth to the Market Towns, Urban Areas and Core Villages by virtue of their sustainability (i.e., access to services and facilities, employment, public transport, infrastructure etc.), however, proportionate growth should also be directed towards more rural settlements such as Hamlets to ensure their sustained vitality and positive growth over the Plan period.

The proposed growth in Hamlets comprised of outstanding planning permissions (at 01/04/18) and new homes over the Plan period accounts for 3% of the total housing delivery (404 homes). Distributed across the Plan period, 404 homes equate to approximately 22 units per annum. When split across the 37 Hamlets, this equates to just 1-2 houses per Hamlet per annum over the Plan period. This figure seems very low.

It is accepted Hamlets have poorer access to services and infrastructure, and therefore are considered less sustainable and suitable to accommodate higher levels of growth when compared to larger, more urban settlements. This does not, however, justify such a low quantum of growth over the Plan Period for such settlements, especially when viewed against the context of the need to support rural communities and sustain vitality as stated in the NPPF.

Paragraph 78 of the NPPF makes it clear that in order to promote sustainable development in rural locations, new housing should be located where it will enhance or maintain the vitality of rural communities, and planning policies should support and identify opportunities for rural villages to grow and thrive, especially where they can support local services.

Apportioning such low levels of housing to Hamlets over the Plan period risks stagnating these communities, further exacerbating their declining vitality and prosperity.

The principle of the policy is supported because it allows development to take place in these communities and reflects national planning policy for development of houses in the countryside.

The policy also aims to provide homes where they are needed and doing so in such a way that protects the character of the countryside. It is argued this could still be achieved if the policy had more flexibility. An example is the use of the words 'within' and 'infill'. Instead, the policy should read as follows:

“1. Proposals for windfall development on sites that are well related to dwelling clusters and/or a defined hamlet may be acceptable, subject to all the following criteria being applied:”

This amendment would make the policy more effective and consistent with national policy, allowing sustainably located sites to come forward rather than just sites between existing dwellings in a linear pattern along a road frontage. The other criteria set out in the policy provides adequate safeguards to protect against inappropriate development taking place.

5.1 c) Is the scale and type of development allowed in part c) justified and sufficiently flexible?

Paragraph 59 of the NPPF sets out the Governments' objective to significantly boost the supply of homes. It states; *'it is important that a sufficient amount and variety of land can come forward where it is needed.'*

Paragraph 68 of the NPPF states *"small and medium sites can make an important contribution to the housing requirement of an area and are often built-out relatively quickly."*

Paragraph 68 goes on to state *“local planning authorities should support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.”* This paragraph provides support for windfall sites, and small sites which can be built quickly, such as those which will be found around clusters and hamlets in rural areas.

The NPPG and paragraphs 77 and 78 of the NPPF confirm the importance of rural housing. The role of rural housing is recognised as *“supporting the broader sustainability of rural communities”*.

Part c) of the policy limits the scale of development to one dwelling or a pair of semi-detached dwellings and only within a continuous built-up frontage.

These restrictive definitions are not considered to be consistent with the NPPF which expresses support for housing in rural area without reference to specific limits. The other criteria specified in the policy provide adequate safeguards to protect against inappropriate development and the limits imposed by Part c) are considered unjustified and inflexible.

Therefore, part c) should be omitted or reworded as follows:

*“The scale of development is to be small-scale as appropriate to the size of the site and its location, in order to achieve an efficient use of land”*.

This amendment would introduce a greater degree of flexibility and enable the benefits of more development to be realised where circumstances allow.

The challenges of housing supply and affordability in rural areas are recognised in national policy and guidance. These challenges include affordability and availability of suitable housing where local people want to live.

The changes proposed meet the requirements of national planning policy to deliver rural homes and to deliver small sites. Without these changes, the draft Local Plan will not meet the housing needs of rural areas or deliver sustainable development by providing suitable housing for local needs. The suggested changes are needed to make the policy comply with national planning policy and deliver the homes and small sites needed in rural areas.

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