

HEARING STATEMENT FOR

BABERGH AND MID SUFFOLK JOINT LOCAL PLAN EXAMINATION

MATTER 9: ALLOCATION SITES FOR HOUSING AND OTHER DEVELOPMENT AND SETTLEMENT BOUNDARIES

BALLYMORE GROUP AND MR & MRS PRICE

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1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Pegasus Group on behalf of Ballymore Group and Mr & Mrs Price (the parties) in the context of the promotion of Land east, west and south of Hook Lane, Hadleigh for residential development infrastructure and a new sports hub. The site is not allocated in the submitted version of the emerging Joint Local Plan but can be identified with the reference SS0221 in the SHELAA (EH06, October 2020).
- 1.2 This Hearing Statement should be read in conjunction with representations made on behalf of the parties at previous stages of the Local Plan preparation, including representations submitted to the Regulation 19 public consultation on the Pre-Submission Local Plan in December 2020 and to the Regulation 18 Preferred Options consultation in September 2019. 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 9 – Allocation Sites for Housing and Other Development and Settlement Boundaries

9.1 Are the sites allocated for housing and other development in policies LS01(1-90) and LA001 – LA119 soundly-based; are the criteria and requirements set out in the relevant policies justified and effective; and is there evidence that the development of the allocations is viable and deliverable in the timescales indicated in the Housing Trajectory set out at Appendix 01 of the plan?

- 2.1 This question is answered in relation to Land east, west and south of Hook Lane, Hadleigh, identified in the SHELAA (EH06, October 2020) with the site reference SS0221. The site is viable and deliverable. This site is not allocated for development in the submitted Local Plan, however the parties consider it important to discuss here in particular in light of the additional work requested by the Inspectors following the Matter 4 hearing session on 21 July 2021.

2.2 As discussed in our Matter 4 hearing statement, the Councils have not currently demonstrated any reasonable justification for discounting site SS0221. Indeed, the discounting of the site appears to be for spurious reasons and has not been justified in any manner, especially when it is noted that alternative sites that have been allocated in Hadleigh are subject to the same constraints (in addition to others that makes said sites materially less deliverable) that the Councils have suggested are applicable to SS0221. The parties do not agree that a reasonable and robust process was undertaken by the Councils in deciding that the site was not suitable for allocation.

2.3 The parties therefore entirely agree with the request made by the Inspectors for the Councils to publish the detailed assessment for all sites submitted to the LPA via the Call for Sites. As well as further evidence from the Councils to justify why similar, or worse, performing sites that are evidently appropriate for development have either been selected or discounted in the same settlement. The publication of this evidence will allow the parties to assess whether the Councils have undertaken a robust and sound approach in assessing housing sites allocated in the Local Plan against possible alternatives. This will also assist in clarifying whether the approach taken by the Councils allows for the identified housing needs of each settlement to be appropriately met. The parties reserve the right to respond in due course to the additional publication of evidence by the Councils.

9.5 Is the "contributions to the satisfaction of the LPA, towardsxxxx" wording used in many of the LAXXX policies justified and effective? Would "contributions towardsxxxx, to ensure that the development is acceptable in planning terms" be more appropriate?

2.4 This is a matter for the Councils to justify, but in our opinion the simple answer to each question is no.

2.5 The parties consider it important that it is ensured that the policy wording satisfies the relevant test required by national policy and the Planning Practice Guidance. The policy wording as currently proposed introduces an element of uncertainty that is not helpful to developers and has the potential to disrupt

the deliverability of allocations. The Councils must provide more clarification and details of the contributions required; the contributions requested must be directly proportionate to the impacts of the development. We suggest that as part of the Councils ongoing work requested by the Inspectors, an update to the evidence on deliverability should be provided by the Councils.

9.6 Are the settlement boundaries as shown on the policies map justified and effective?

- 2.6 In the case of Hadleigh, the parties consider that the answer to this question is no. Inadequate evidence has been provided to justify the scale of development proposed for this settlement or the rejection of site SS0221. Both matters have direct relevance to the consideration of the appropriateness of settlement boundary for Hadleigh.
- 2.7 The parties have previously submitted detailed representations, most recently through the Matter 4 hearing statement, explaining why Hadleigh is capable of supporting levels of growth above that currently identified within the submitted Local Plan.
- 2.8 The town is an eminently sustainable location as discussed in detail in our Matter 4 hearing statement. The low housing supply that has been allocated to Hadleigh is not commensurate with its sustainability or its designation as a Market Town in recognition of the important function the town plays in the local rural area. The allocation of additional suitable sites in Hadleigh, like SS0221, would help to ensure the continued vitality of the town and ensure the delivery of sufficient housing of appropriate quality and mix throughout the plan period.
- 2.9 Detailed information has been submitted at the previous stages of the Local Plan preparation process which has illustrated the sustainable development potential of the site. This included a Delivery Statement prepared on behalf of the landowners at the Regulation 18 stage, which the Inspectors are invited to refer to. The Delivery Statement was supported by baseline technical assessments to ensure robustness in the site proposals and a good understanding of site constraints. The Statement demonstrates that the site is

capable of delivering new sports facilities, new public open space and around 250 new homes, including affordable and self-build homes.

- 2.10 The multipurpose sports and community facilities could include new playing pitches, changing facilities and potentially a new club house/community centre in a new village green. This would be a benefit to existing sports clubs and community groups in Hadleigh. The Council has failed to adequately justify its rejection of this site in light of these submissions and the benefits that the site can bring – especially in light of the acknowledged issues with recreation and sports pitch provision identified in the current Infrastructure Delivery Plan (ER01).
- 2.11 Development of the site would comprise a logical and sustainable extension to Hadleigh, with the parcel on which residential development and wider area benefitting infrastructure and ecological improvements is proposed being well-enclosed by existing roads and existing boundary vegetation. The site is located immediately adjacent to the existing settlement boundary, with an existing pedestrian connection to the site. There are opportunities readily available for revised road arrangements, pedestrian and cycle routes that could further improve links to existing infrastructure, providing safe and convenient access to and from existing services and facilities as well as open space. This includes the public right of way located along the northern boundary of the site, as well as the existing Hadleigh Railway Walk located close to the west of the site.
- 2.12 The location of the site in the context of Hadleigh and existing services and facilities is illustrated on the Site Context Plan contained at Appendix 1. Based solely on existing connections, the site is between 10 and 20 minutes' walk from everyday facilities such as schools, supermarket and pharmacy. This does not take into account the potential for the site to improve pedestrian links, which would further improve pedestrian accessibility.
- 2.13 The plan contained at Appendix 2 clearly illustrates the opportunities that are available to link into the existing pedestrian routes that are located in the vicinity of the site. The plan at Appendix 3 further explains how the site could

connect into and enhance these routes, allowing easy access for the site itself and to routes leading into the wider countryside. The site is therefore demonstrably sustainable and well-connected to Hadleigh; measures could be put into place to ensure these sustainable travel links are made the most attractive travel option for future residents. The ability for the site to connect into the existing network is explained further in the Delivery Statement.

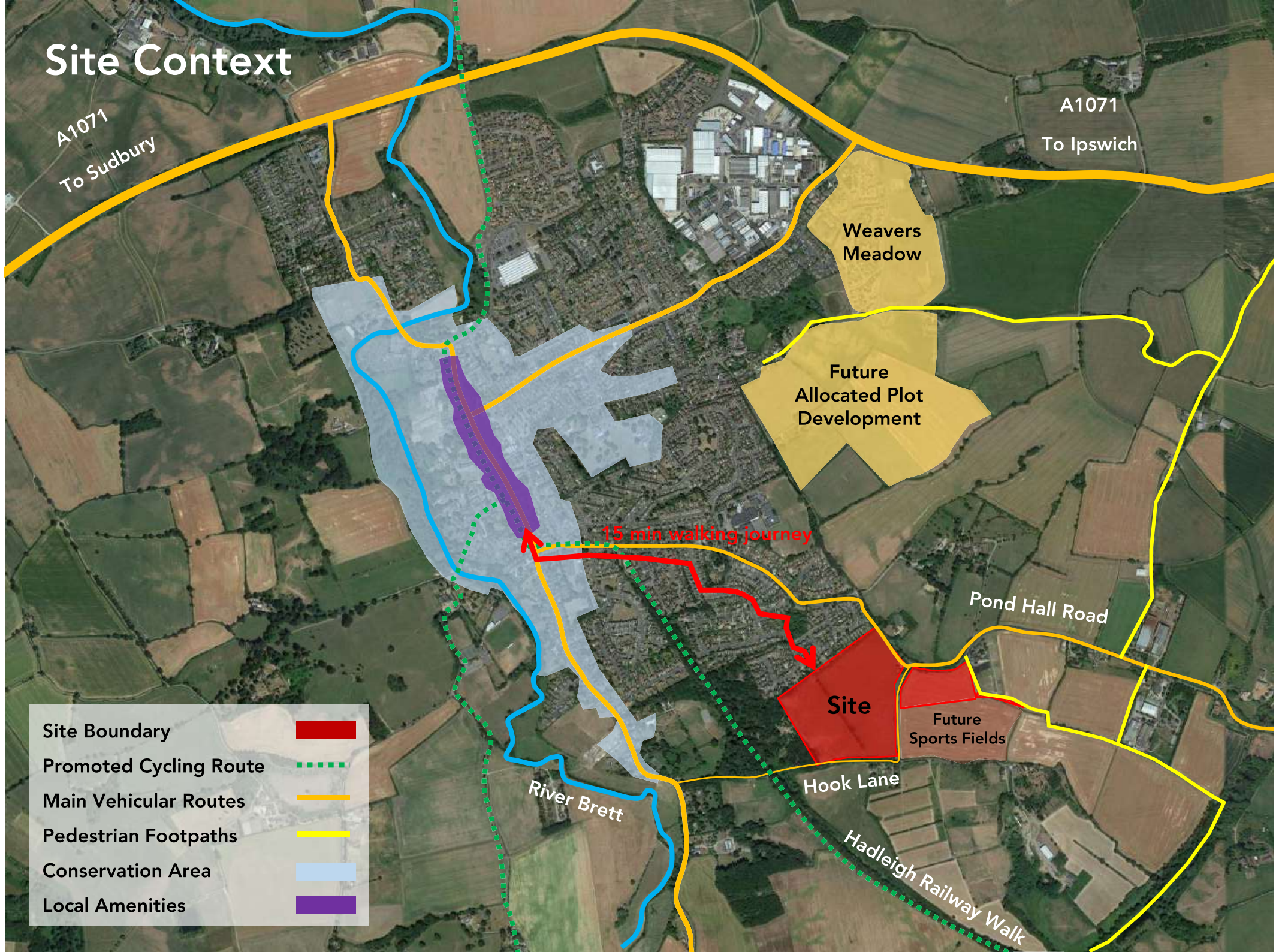
- 2.14 The Councils decision to discount the site from the site selection process because of 'poor connectivity to the existing settlement' is therefore disputed and lacks credible evidence. The above and previously submitted representations shows that there are no site-specific constraints which would hinder the ability to provide and enhance pedestrian and cycle links to existing infrastructure. Indeed, the site benefits from good connectivity due to its proximity to existing amenities, road and pedestrian/cycle networks which can be linked to.
- 2.15 The site has much to offer through its community and sport offer, particularly in respect of health, and the good connectivity of the site would allow convenient travel for both visitors and residents. The community infrastructure that the site could potentially deliver would therefore be of benefit to both existing and future residents of Hadleigh and will be particularly beneficial as the town continues to grow. This offer will supplement the existing Designated Open Space that is located adjacent to Hook Lane, access to which could be appropriately improved.
- 2.16 The other reason provided by the Councils for discounting site SS0221 is the site's location in an area of high heritage sensitivity. This again is considered to be a spurious reason to not consider the site for allocation, with there being no evidence justifying the Councils' reasoning. The Heritage and Sensitivity Assessment (EE05) which forms part of the Council's evidence base advises that new development should be directed towards the eastern boundary of the settlement, as this area is of a low heritage value. This conclusion was based on the results of a sensitivity assessment which assessed Hadleigh along with other settlements in detail, to establish the most suitable areas for new development. The assessment found that modern development was located

along the eastern boundary of the settlement, resulting in low heritage value.

- 2.17 Site SS0221 is located on the south-eastern boundary, away from the central historic core and the conservation area. There are also no designated heritage assets in close proximity which development of the site would be likely to have an adverse impact upon. Further detail can again be found in the previously submitted Delivery Statement, in explaining the site's location in relation to designated heritage assets. This information confirms the assessment provided in EE05, that the eastern boundary of Hadleigh including the location of SS0221 is not an area of high heritage value or sensitivity. Heritage impacts are therefore not a reasonable reason for concluding that the site is not suitable for development, with there being no basis for the Councils to reach such a conclusion.
- 2.18 For all of these reasons, the parties consider that the settlement boundary for Hadleigh has not been justified and is not effective. The parties therefore request that the Council address this matter in the further work that the Inspectors have requested with reference to the evidence that the parties have submitted as part of this process.

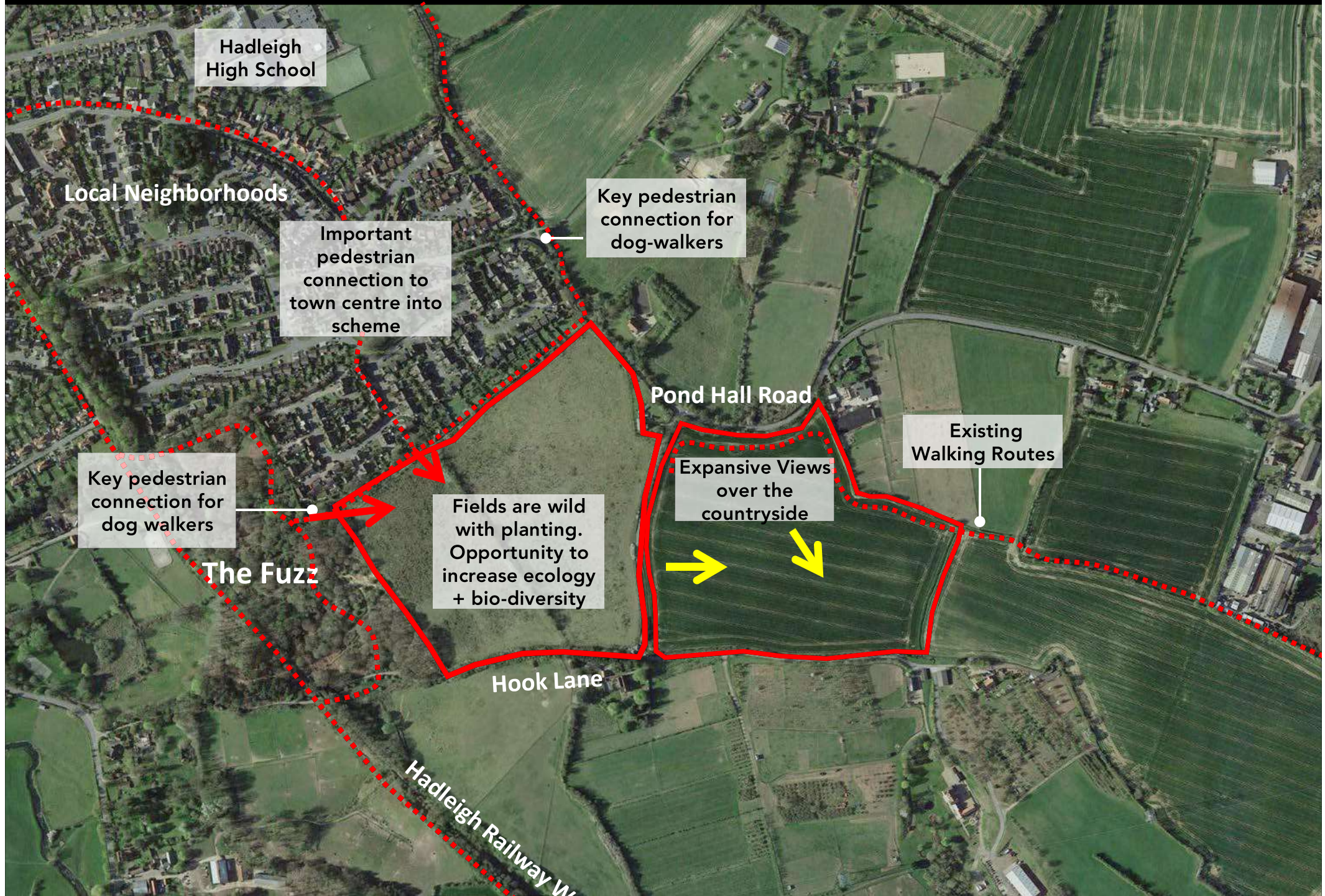
Appendix 1 – Site Context Plan

Site Context



Appendix 2 – Opportunities to Improve Connectivity

Existing Site – Constraints & Opportunities



Appendix 3 – Site Connectivity

Masterplan Development – Create a new Village Green enhancing local walking routes into Town Centre

Village Green

The
'Fuzz'

Hadleigh Railway Walk

