

EXAMINATION OF THE BABERGH AND MID SUFFOLK JOINT LOCAL PLAN

HEARING STATEMENT ON BEHALF OF CAVERSWALL ENTERPRISES, HIGHBRIDGE,
& WEST SUFFOLK NHS FOUNDATION TRUST

**Matter 9 – Allocation Sites for Housing and Other Development and Settlement
Boundaries**

(Part 3 of the Plan- Place and Allocation Policies)

1. This Statement has been prepared by Vincent and Gorbings on behalf of Caverswall Enterprises, Highbridge and the West Suffolk NHS foundation Trust ('Caverswall/Highbridge/NHS').
2. Caverswall/Highbridge/NHS have interests in land north of Church Field Road, Sudbury, which is allocated in the adopted Local Plan for employment use, although proposed to be de-allocated from this use in the emerging JLP. A planning application for residential development and a care home is currently being considered on the site by Babergh and Mid Suffolk District Council (BMSDC).
3. This Statement addresses, where appropriate, the questions raised by the Inspector under Matter 9 – 'Allocation Sites for Housing and Other Development and Settlement Boundaries'. We have not sought to answer every question asked by the Inspector but only those relating to the representations made by Caverswall/Highbridge/NHS on this matter, in accordance with the guidance.

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?

4. It is not clear how some sites have been allocated for development while others, such as Site SS0590; Land North of Church Field Road Sudbury have not been allocated for residential use. A direct comparison can be made between Land north west of Waldingfield Road, Chilton (LA041) and Site SS0590. Site SS0590 is considered to be a reasonable alternative in the Sustainability Appraisal but it has not been allocated despite scoring a similar level in the traffic light assessment (red, amber and green) as Site LA041. It is therefore considered that some sites in the JLP are not soundly based.

5. It is considered that there is an over-reliance on larger sites to deliver housing in the mid to later plan period (2027 onwards) with sites such as Capel St Mary (LA055) 520 dwellings, Great Cornard (LA042) 500 dwellings, Hadleigh (LA028) 600 dwellings and Sproughton (LA013) 300 dwellings not due to start delivering dwellings until 2028/29 as shown in the Housing Trajectory. There is limited information to demonstrate the deliverability of these sites and smaller more readily available sites, such as Land North of Church Field Road, Sudbury (Site SS0590) should therefore be allocated to ensure that there is a sufficient supply of houses in the early plan period. The deliverability of smaller sites is generally less prone to delays.

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

6. It is not considered that the settlement boundaries are justified or effective and this relates back to Policy SP03; Settlement Hierarchy in the JLP. Policy SP03 seeks to make a distinction between Sudbury, which is in the second tier of the hierarchy, and the surrounding areas of Chilton, a Hinterland Village and Great Cornard, a Core Village. Part 3 of the JLP (p 309) states that 'to see the relevant Plan allocations for the area surrounding Sudbury, please view the Chilton and Great Cornard place sections'. However, the settlement boundary around Sudbury includes the proposed allocations within Chilton and Great Cornard. There is no justification why Policy SP03 is seeking to distinguish between Sudbury and the surrounding areas, yet the settlement boundary is seeking to amalgamate the areas into one settlement (Sudbury). The approach is not consistent.