



James Bailey
PLANNING

Document:

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

Title:

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

Client:

Harris Strategic Land

Date:

August 2021

Hearing Statement

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

**Statement on behalf of Harris Strategic Land in relation to LS01(67): Land
south of Forest Road, Onehouse**

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

August 2021

1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of our client Harris Strategic Land in respect of Matter 9 – Allocation Sites for Housing and Other Development and Settlement Boundaries 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 9, which is due to be considered for the discussion at the Examination Hearing session on Monday 1st November 2021.
- 1.3 It should also be read in conjunction with the requested Site Response Form submitted and supplied to BMSDC during July 2021.

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? [Note: in responding to this question please be clear about the site(s) you are referring to using the site name referred to in the plan and the relevant “LA” number reference (eg LP045: Land south of Tamage Road, Action) or the Policy LS01 list number (eg LS01(45): Cotton: Land north of Mendlesham Road)]

- 1.4 Overall, Harris Strategic Land support the allocation of site LS01(67), Land south of Forest Road, Onehouse in the Joint Local Plan. We have sought to address question 9.1 by splitting it into its separate parts as follows:
- 1.5 ***Are the sites allocated for housing and other development in policies LS01(1-90) and LA001 – LA119 soundly-based?***
- 1.6 During the Matter 4 preliminary session between the Councils’ and the Inspectors’ on the 21 July 2021, there was a discussion over the absence of published evidence as to why sites have been either “selected” or “dismissed”, including the Councils’ final decision on an appropriate number of houses required for individual settlements.
- 1.7 The discussion concluded that the Inspectors’ struggled to find some of the necessary evidence in order to judge the ‘soundness’ of the proposed spatial strategy. Indeed, one of the Inspectors’ confirmed that a crucial piece of evidence was not publicly available, relating to the site assessments of discounted sites. It is therefore unhelpful that the submission deadline for the Matter 9 Hearing Statements is before this further evidence work is available for all interested parties to review, consider, and comment on.

- 1.8 ***Are the criteria and requirements set out in the relevant policies justified and effective?***
- 1.9 Policy LS01 – Hinterland and Hamlet sites, simply states that development of these sites shall be expected to comply with the relevant policies of the Plan, and also have regard to the Council’s latest Infrastructure Delivery Plan for infrastructure capacity and requirements.
- 1.10 There are no infrastructure capacity requirements identified for LS01(67) within the Infrastructure Delivery Plan.
- 1.11 At this time, it is considered that the criteria and requirements for LS01(67) are correct, relevant, and justified.
- 1.12 ***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?***
- 1.13 LS01(67), Land south of Forest Road, Onehouse is a viable and deliverable site.
- 1.14 Pre-application discussions have taken place with Mid Suffolk District Council and Suffolk County Council Officers in June 2021, and an Outline planning application is being prepared for submission in Autumn 2021.
- 1.15 It is therefore considered that this site will therefore be brought forward ahead of the timescales indicated in the Housing Trajectory of delivery from 2025-26.
- 9.2 - Do the sites allocated for housing and other development in policies LS01 (1-90) and LA001 – LA119 give great weight to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty (AONB) in line with paragraph 172 of the NPPF?***
- 1.16 No comment.
- 9.3 - Are any of the sites allocated for housing/other development within the AONB likely to constitute major development and if so are the exceptional circumstances required to permit such proposals, in line with paragraph 172 of the NPPF, likely to exist?***
- 1.17 No comment.
- 9.4 - Are the precise dwelling numbers listed in policy LS01 justified and effective? Would approximate figures be more appropriate?***
- 1.18 Approximate figures are considered necessary in order to improve the LS01 policies, notably as these tend to be much smaller sites.

- 1.19 In many cases an estimate has been made for a site, based on a dwellings per hectare approach, which has little proper assessment of a site's characteristics and relationship with its surrounding area. This tends to lead to an underestimation, or conservative estimation, of a site's delivery.
- 1.20 It is considered that adding the wording "approximately" would allow the sites to be properly considered and demonstrated through the planning process, starting with a pre-application enquiry. This in turn would allow the Local Authority and the relevant Officers to fully test the site in question and the proposed numbers, safe in the knowledge that they are not hamstrung by a specific number.
- 1.21 This is demonstrated by the allocation of 10 dwelling to LS01(67), when in reality the site can comfortably fit more than this. This has been tested and supported by a proper pre-application enquiry, with both developer and Officers knowing how an application can be successfully brought forward.

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?

- 1.22 Harris Strategic Land strongly disagree with this approach.
- 1.23 There may be many circumstances where contributions are not required at the time of application as the position has changed, for example where a school forecast changes so there are surplus places, or a possible change in strategy.
- 1.24 It is therefore only right that the Local Planning Authority are able to make that judgment at that time of an application, based on statutory consultee responses and not be forced into a historic line of thinking by a fixed policy position, which may not be CIL 122 compliant at that time.

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

- 1.25 Yes. The amendments to the settlement boundary for Onehouse are agreed with, in terms of allocating LS01(67), Land south of Forest Road, Onehouse. This would appear to make a sensible and realistic approach for limited growth to the village.

***August 2021
JBPL***



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