



BABERGH AND MID SUFFOLK JOINT LOCAL PLAN EXAMINATION

MAIN MATTER 9 - STATEMENT

Examination Statement
On behalf of Hyde
Parker Farms

August 2021

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

(Part 3 of plan – Place and Allocations Policies)

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?

As evidenced by Tables 8 and 9 of the Joint Local Plan – Topic Paper: Spatial Housing Approach (Document EP03), a substantial number of dwellings have already been granted planning permission across Babergh and Mid Suffolk districts. This has therefore determined a large proportion of the spatial distribution and the selection of housing sites allocated in the Plan. As a starting position, it is however, evident a large number of the sites allocated in the plan have not been tested against possible alternatives at all.

BMSDC state in their letter to the Inspector, dated 23 April 2021, (JLP Core Document Library Ref: G01) “The emerging spatial distributions have not influenced the selection or rejection of sites in the SHELAA.” This is reassuring because the criteria used to justify the rejection of sites is considered to be neither proportionate nor robust.

The list of sites discounted is found at Appendix E of the SHELAA, which provides each site assessed through the Call for Sites process a single reason for being discounted from the process, and therefore omitted from further consideration in the Local Plan Process. Sites were therefore discounted on the basis of a single criterion which was afforded significant weight to be sufficient justification to reject the site from the selection process.

Whilst each site assessment criteria within the Red, Amber, Green scoring system offers detail and supporting examples of how that criteria is scored, there is no evidence beyond this to establish how much weight is given to each of the criteria when assessing sites. To our knowledge, an assessment in accordance with SHELAA methodology is yet to be

published by the Council. Indeed, it was confirmed by BMSDC Officer's at the initial Matter 4 Hearing Session held on the 21 July 2021 that none of the discounted sites benefit from a published assessment in accordance with SHELAA methodology. Accordingly, in respect of discounted land, the site selection process and the basis for making site allocations is not transparent and there is therefore no way for the Inspector or the public to ascertain whether the process is justified and effective. As a result, it is not possible to assess whether the process which has led to the allocation of sites for housing and other development in policies LS01(1-90) and LA001 – LA119 is soundly-based.

The absence of a breakdown for the scoring system applied to each discounted site in the SHELAA is a concern as no justification is given as to how the Councils came to the decisions as set out in Appendix E. Without being able to interrogate this breakdown, there is a concern that sites have been discounted where they have scored poorly against a single criterion, without full consideration of how they score against all other criteria.

The plan seeks to allocate only one site to the Core Village of Long Melford. Site LA113 is allocated for 150 homes and received planning permission on 1 April 2020 following an appeal by Gladman in respect of Babergh District Council's failure to determine application ref. DC/18/00606.

As a result, there are no new sites in Long Melford allocated to deliver future housing over the plan period. Land east of High Street and west of the A134 should be considered suitable for allocation.

Land east of High Street and west of the A134 was assessed in the Councils 2020 SHELAA (Site Reference SS0934) and identified as a potential location for employment use, with "no known achievability constraints or abnormal costs to development of the site." Importantly, the Councils also concluded the site "Has excellent strategic transport links and is considered suitable."

When considered for housing development in the SHELAA under site reference SS0561 the Councils concluded however that the “Site has poor connectivity to the existing settlement and is not consistent with the settlement pattern.” Site SS0563, which forms the southern section, was assessed as being “likely to cause substantial harm to designated heritage assets and their settings which cannot be reasonably mitigated.”

We would argue the evidence used to justify the rejection of sites is neither proportionate nor robust. The identification of land to the east of High Street and west of the A134 as being suitable for employment use but unsuitable for residential use is a case in point. A more proportionate assessment of the sites’ attributes would likely conclude that both uses would be suitable.

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

Flexibility should be added to policy SP03 to allow for edge of settlement sites and well related brownfield sites to be considered as suitable locations to deliver the development needs of the Plan. Settlement boundaries should not be used to refuse otherwise sustainable development.

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