

**BABERGH & MID
SUFFOLK JOINT LOCAL
PLAN EXAMINATION**

**MATTER 9: SITES
ALLOCATED FOR
HOUSING**

REP ID: 21811, 21812

HEARING STATEMENT

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MATTER 9 – SITES ALLOCATED FOR HOUSING

Introduction

- 1.1 This Hearing Statement for Matter 9 has been prepared by Carter Jonas LLP on behalf of Obsidian Strategic Asset Management Ltd (OSAM) to respond to the Inspector's questions. OSAM has promoted land east of Church Road in Thurston as an additional allocation for up to 500 dwellings in two phases.
- 1.2 OSAM submitted representations to the pre-submission draft Babergh and Mid Suffolk Joint Local Plan (Draft BMSJLP) that address the issues raised in Matter 4. The relevant Id. numbers for those representations are as follows:
- Appendix 1: Housing Trajectory – Rep Id. 21811
 - Part 3: Maps & Allocations – Thurston Sites – Rep Id. 21812

Matter 9 – Sites Allocated for Housing

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?

- 1.3 It should be noted that OSAM's original representations incorrectly referred to Site Ref. LA087 as LA088; the information and commentary in the representations is correct but all references to LA088 should be replaced with LA087.
- 1.4 OSAM is promoting an additional housing site in Thurston, and as such the response to this question is focussed on the allocations in Thurston. OSAM does not object to any of the proposed site allocations in Thurston, however, several sites already have planning permission, and are commitments not allocations. Those 'allocations' in Thurston with planning permission would be delivered in the short term, as identified in the housing trajectory set out in Appendix 01 of Draft BMSJLP. As set out in OSAM's representations to Appendix 01 (Rep Id. 21811), there are two allocations in Thurston – LA087 and LA089 – that would be delivered much earlier than predicted in the housing trajectory set out in Appendix 01 because approved conditions (for LA087) and likely conditions (for LA089) specify shorter timescales for the commencement of development. Therefore, as set out below, the housing trajectory for these two sites should be adjusted. The social objective of sustainable development, as set out in Paragraph 8 of the NPPF, seeks to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and this must include housing and affordable housing needs arising towards the end of the plan period.
- 1.5 Site Allocation Ref. LA087 (Land south west of Beyton Road, Thurston) has planning permission (Ref. DC/19/03486 – granted 23rd December 2020) for 210 dwellings. The planning permission is subject to an implementation time limit condition that is shorter than normal; Condition No.1 requires submission of reserved

matters within 12 months and commencement of development within 18 months of final approval of reserved matters. The pre-commencement conditions have been discharged. The reserved matters were submitted in December 2020 but have not yet been decided. It is noted that revised drawings have been submitted recently, which were presumably submitted in response to consultation feedback. There is nothing to indicate that reserved matters will not be approved in the near future. The site is controlled by a housebuilder – Bloor Homes – who will want to commence development as soon as possible. It is predicted in the Housing Trajectory in Appendix 01 that development at this site would commence in 2027/28 and be completed by 2033/34. We disagree, this is based on the grant of outline permission, discharge of conditions, current activity seeking approval of reserved matters, and control of the site by a housebuilder. It is very likely that the reserved matters will be approved during 2021 and that development would commence in 2022. The assumption that 33 dwellings would be delivered per annum is not changed, but it is likely that a higher annual delivery rate would be achieved particularly when both market and affordable housing would be delivered at the site. **Therefore, it is requested that the housing trajectory in Appendix 01 is adjusted, so that development at Site Allocation Ref. LA087 commences in 2022/23, and at a delivery rate of approximately 33 dwellings per annum, and completes by 2027/28 i.e. 6 years earlier than predicted in the housing trajectory.**

- 1.6 Site Allocation Ref. LA089 (Land east of Ixworth Road, Thurston) is the subject of an outline planning application (App Ref. DC/19/02090) for 200 dwellings. The application was submitted in April 2019 and is currently pending. It has been reported to Planning Committee on two occasions with a recommendation for approval subject to conditions and a S106 Agreement, most recently in August 2020, but was deferred so that the Local Highway Authority could attend the meeting. The report to Planning Committee recommended a condition with a reduced implementation time limit, that would require submission of reserved matters within 2 years and commencement of development within 18 months of final approval of reserved matters. It appears that, as a result of the decision to allocate the site and the officer recommendations to resolve to grant planning permission, the principle of development is acceptable. It is likely that in the near future a decision will be made to grant outline planning permission. The applicant for the site is a land promoter – Gladman – which means that following the grant of outline planning permission the site will need to be sold to a housebuilder/developer to bring forward reserved matters and deliver the residential development. The sale of the site is presumably reflected in the recommended planning condition allowing 2 years for submission of reserved matters. It is predicted in the Housing Trajectory in Appendix 01 that development at this site would commence in 2027/28 and be completed by 2033/34. We disagree because there is a pending planning application that officers have previously recommended for approval, and a land promoter is involved in the site. It is likely that outline planning permission would be granted during 2021. Gladman, as a land promoter, would want to dispose of the site as quickly as possible. There is strong interest from housebuilders in development sites in Thurston as demonstrated by the other developments in the village, so the sale of the site will be relatively straightforward and for the purchaser to obtain approval of reserved matters and commence development within 2 years. The recommended time limit condition allows for 3.5 years from outline permission to start of development, which would mean commencement of development by 2024/25 at

the latest. **Therefore, it is requested that the housing trajectory in Appendix 01 is adjusted, so that development at Site Allocation Ref. LA089 commences in 2024/25, and at an unchanged delivery rate of approximately 33 dwellings per annum, completes by 2029/30 at the latest i.e. 4 years earlier than predicted in the housing trajectory.**

- 1.7 If, as requested, the housing trajectory for Site Refs. LA087 and LA089 are adjusted so that delivery at these sites is brought forward earlier than predicted, it would mean that all commitments and allocations in Thurston would be completed by 2029/30 at the latest. As highlighted in OSAM's representations to Paragraph 9.12 & Table 4: Minimum Housing Requirement for Neighbourhood Plan Areas (Rep Id. 21810) the made Thurston Neighbourhood Plan makes no allocations for housing; the document identifies those sites with planning permission located on the northern edge of the village but does not allocate them since they are already commitments. Therefore, **it is very likely that no housing or affordable housing would be delivered in Thurston during the final years of the plan period from 2029/30 to 2036/37** and there is no strategy to meet housing needs in the village during this period, because there are no allocations in Draft BMSJLP in this period and no allocations in the made Thurston Neighbourhood Plan either. This outcome is inappropriate for Thurston, which is a Core Village and a sustainable location for additional development. In these circumstances, additional allocations are needed in Thurston for the latter part of the plan period. The site promoted by OSAM at land east of Church Road in Thurston is a suitable location for an additional allocation in Draft BMSJLP.
- 1.8 The response above is focussed on the housing trajectory for two allocations/commitments in Thurston, but it is likely that similar issues arise in other settlements in Babergh and Mid Suffolk including those with a made neighbourhood plan e.g. early delivery of 'allocations' with planning permission than predicted in the housing trajectory, and planning permissions subject to shorter implementation time limit conditions to address previous land supply issues.

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?

- 1.9 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?

- 1.10 No comment.

9.4 Are the precise dwelling numbers listed in policy LS01 justified and effective? Would approximate figures be more appropriate?

- 1.11 No comment.

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?

1.12 No comment.

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

1.13 No comment