
Babergh Mid Suffolk Local Plan Examination

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

1. Introduction & Context

- 1.1. This hearing statement has been prepared by Savills (UK) Limited on behalf of Rainier Developments Ltd.
- 1.2. Rainier Developments are seeking the allocation of Land at Kings Road Glemsford for approximately 100-230 dwellings in this Local Plan. The site has not been allocated but our concerns relate to the soundness of approach taken by the Council in at the proposed Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection. Our representations should therefore be seen as being non site-specific.
- 1.3. Glemsford is a Core Village and arguably one of the most sustainable in Babergh. No sites have been allocated, with the Plan suggesting just 37 homes will be delivered here over the plan period. This is not considered appropriate for a sustainable village which plays a valuable role in supporting its local community. In making our representations, we will refer to Glemsford as an example.

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

- 1.4. No, it is not considered the settlement boundaries as shown on the policies map are justified and effective.
- 1.5. Point 3 of Policy SP03 notes “settlement boundaries have been created as defined on the Policies Map in order to demonstrate the extent of land which is required to meet the development needs of the Plan.”
- 1.6. In accordance with paragraph 119 of the NPPF (2019), local planning authorities “should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs.”
- 1.7. As we have detailed in our response to Matter 4, it is not considered that the spatial distribution and selection of housing sites is based on an appropriate strategy. Furthermore the identification of housing allocations, which have subsequently been included within the settlement boundary, have not been selected against possible alternatives using a robust and objective process. Again this is detailed in our response to Matter 4.
- 1.8. As a consequence, the settlement boundaries as defined on the policies map cannot be said to meet the Councils development needs.
- 1.9. This is particularly true for the settlement of Glemsford. As can be seen from the Policies Map, the settlement boundary is drawn tightly round the existing built up area providing no opportunities for future growth. Glemsford is a Core Village and yet no housing allocations are proposed and it is anticipated just 37 dwellings will come forward on sites with existing planning permission. Furthermore none of the existing permissions will provide affordable housing or contributions towards local infrastructure and services. This is not considered appropriate for a village the scale of Glemsford which plays an important role in servicing its community.
- 1.10. Whilst it is acknowledged that limited windfall development could come forward in the village, due to the tightly constrained settlement boundary proposals are unlikely to exceed a couple of dwellings and thus no affordable housing will come forward over the plan period. The tightly drawn settlement boundary cannot therefore not be considered to meet the development needs of the District.

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- 1.11. As identified by the Councils in Core Document G01 Letter BMSDC (April 2021), the principal reason, and as far as we can see the only reason, no sites were allocated in Glemsford is because the primary school is at capacity.
- 1.12. As we set out in our response to Matter 4, the Council failed to explore reasonable alternatives including the provision of a new school. By drawing the settlement boundary so tightly round the built up area, it is probable few opportunities will present themselves to meet this need.