

# **BABERGH AND MID SUFFOLK JOINT LOCAL PLAN EXAMINATION**

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Tom Barker  
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Babergh and Mid Suffolk Councils

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Dear Mr Barker

## **Babergh and Mid Suffolk Joint Local Plan Examination**

1. Thank you for your letter of 18 November 2021 detailing the Councils' thoughts on additional work to be undertaken to address the concerns we raised at the hearing sessions about the soundness of various aspects of the plan.
2. We have now had the opportunity to reflect further on the evidence we have read and heard and to consider your letter in detail. In the light of this we currently believe that a more fundamental review than your letter proposes is likely to be necessary in respect of the settlement hierarchy, spatial distribution of housing and the housing site selection process in order to determine whether or not these aspects of the plan are sound (in essence policies SP03, SP04 and the LS01 and the LA housing allocation policies).
3. In particular we believe that the settlement hierarchy review needs to consider all tiers of settlement and the concept/boundary of the Ipswich Fringe, not just core villages, hinterland villages and hamlets. Furthermore, to ensure that the plan as a whole is robust it would also be necessary to reassess the housing allocations in all tiers of settlement, not simply market towns/urban areas and core villages. Additionally, whilst your letter proposes potentially appraising additional reasonable alternatives for the spatial distribution of housing, it is

not clear how the preferred strategy would be determined and robustly justified against these. You will recall this was a key concern we raised at the Preliminary Matter 4 Hearing Session about the existing Sustainability Appraisal, site selection process and spatial strategy formulation.

4. Moreover, as your letter details, significant additional work is also necessary in respect of open space designations (policy LP30) and housing for gypsies, travellers and travelling show-people (policy LP09).
5. Based on the indicative timetable in your letter, such work would be likely to take more than a year to carry out which is, in itself, an undesirable delay in the examination. Furthermore, it would leave the examination in an extremely difficult position if it were to be determined at that stage that these crucial aspects of the plan as submitted are not sound. Deleting and adding site allocations often proves to be a complex and difficult process during an examination.
6. We recognise that a large proportion of the housing sites allocated in the plan already have either full or outline planning permission. As a result it is very likely that the majority of them will be implemented. However, if these sites appear in the plan as allocations they have a formal planning status of significance if the existing permissions are not implemented. Consequently, notwithstanding the existing permissions, these sites need to be robustly justified in their own right against possible alternative sites and form part of a robust spatial strategy.
7. Furthermore, we understand that, across the two districts, around 90% of the housing requirement figure detailed in policy SP01 is already provided for by existing completions, sites under construction, sites with full or outline planning permission, sites with a resolution to grant planning permission subject to s106 agreement, allocations in made Neighbourhood Plans and the, reasonable, allowance for 1,000 windfall dwellings. This unusual situation means that demonstrating a supply of developable housing land for the vast majority of the plan's overall housing requirement figure is, for some years to come, unlikely to be dependent on the allocation of the housing sites included in the submitted plan.
8. Whilst we cannot reach final conclusions on the other aspects and policies of the plan at this stage (pending consultation on Main Modification and further SA/HRA work), we anticipate that, subject to the Main Modifications discussed at the hearing sessions, it is likely that we will be able to find them sound.
9. On this basis and subject to detailed discussion and consultation and necessary alteration to the Councils' Local Development Schemes, we currently consider that the most appropriate way forward would be to:

- Delete policies SP04, LP09, LP30 and the LS01 and LA housing allocation policies;
- Retain the settlement boundaries in the current (as opposed to proposed) policies map;
- Significantly modify policies SP03 and LP01 to make clear where new housing development will be permitted;
- Retain the open space designations included in the current (as opposed to proposed) policies map and retain as “saved” the relevant open space policies in the extant plans;
- Include in the plan a positively-worded policy, consistent with the PPTS, against which any applications for accommodation for gypsies, travellers and travelling show-people can be assessed;
- Modify the remaining policies in line with the discussions held at the hearing sessions.

10. In essence the plan would be a “Part 1” local plan, to be followed by the preparation and adoption of a “Part 2” local plan as soon as possible. The “Part 2” plan (and associated policies map alterations) would be likely to include:

- An up-to-date, robust settlement hierarchy;
- A spatial distribution for any housing allocations included insofar as are necessary to provide flexibility and ensure that the plan period housing requirement can be met;
- Consequent housing requirement figures for Neighbourhood Plan areas;
- Up-to-date and robustly justified settlement boundaries reflecting commitments and allocations;
- Robustly justified open space designations and a relevant development management policy;
- An up-to-date assessment of need for accommodation for Gypsies, Travellers and Travelling show-people and, if necessary, allocations to provide for this need.

Other matters may also need to be addressed dependent on the circumstances at the time and the extent to which the evidence base is up-to-date.

11. In essence the preparation of the Part 2 plan would involve the same work detailed in paragraph 2 above, but could be undertaken, outside the constraints and difficulties of a “live” local plan examination, and with the benefit of an up to date plan in place setting out a housing requirement figure and development management policies.

12. We would like to discuss this proposed way forward (and the precise Main Modifications which would be necessary to achieve it) at the Exploratory Meeting on 16 December 2021, but in the meantime feel free to contact us with any initial thoughts you have. However, at this stage we are not seeking,

nor do we envisage accepting, any comments from other parties to the examination.

Yours sincerely

*Malcolm Rivett and Alison Partington*

INSPECTORS