Babergh and Mid Suffolk Joint Draft Local Plan Consultation, August 2017, Public Consultation

Having reviewed the documents, the Society has made the following response:

**Housing Delivery**

Q 7. Do you agree with the proposed approach set out under Option HR1? If not, please explain why and what alternatives you propose.

Yes we agree with the application of the OAN formula as set our under option HR1. However for housing delivery prefer HD2 which meets the identified need. We do not agree with HD1 which applies a contingency as the case to oversupply via additional reserve development sites has not been made. The failure to deliver housing requires measures from central government to ensure developers implement extant consents rather than local councils allocating more greenfield sites for development.

Q 8. When allocating sites what scale of contingency should be applied? Please explain why.

We do not think the case for applying contingency has been made. The failure to deliver housing requires measures from central government to ensure developers implement extant consents rather than local councils allocating more greenfield sites for development.

Q 9. Are there any specific measures that could be included within the Joint Local Plan that would assist with delivery?

It has been shown that the housing shortage is due in a large part to the failure of the market to build out extant consents and not the planning process. We do not consider that the joint local plan is an appropriate vehicle to ensure that developers deliver housing in a timely manner after permission has been granted. Measures should be imposed upon developers which can only be achieved by central government.

**Settlement Hierarchy**

Q 11. Do you agree with the proposed criteria approach to rank settlements in the hierarchy? If not, please explain a suggested amendment or alternative.

No. We consider the methodology has weaknesses specifically regarding the distance from principle road networks which is not factored in. This gives rise to anomalous situations which looks only at facilities and proximity to larger settlements rather than accessibility.
We think that this is not in accordance with the principles of sustainability as set out in the NPPF.

The weighting of the points system used also seems to be rather arbitrarily decided upon and is not based on any accepted standard approach.

On the basis of some sample checks (Mellis and Stoke by Nayland) we are concerned to note significant errors in the services and distances from a town identified in the Services and Facilities Matrix. We therefore urge that these are carefully verified especially for settlements where the scoring is within one or two points of a boundary threshold.

Q 12. Do you agree with the proposed joint settlement hierarchy? If no, please provide further details as to how the hierarchy should be amended.

Yes

Spatial Distribution

Q 13. Which option(s) for housing spatial distribution do you think is the best? Please explain your answer.

BHD1 and MHD1, The County Town Focussed options, are preferred on the basis that Ipswich is the county town and provides the greatest level of employment and services and has the best connections to the wider transport network. This approach protects the market towns and core villages, many of which are historic centres, from disproportionate levels of new development which could harm their character.

Housing Types and Affordable Housing

Q 19. Should the Councils be prioritising the provision of any particular types of homes?

The Councils should plan to deliver housing according to the type, tenure and size requirements as identified by the OAN process.

Rural Growth and Development

Q 26. Which option for the policy approach to rural growth do you think is most appropriate?

We prefer option RG2

Q 28. Do you support the approach proposed for hamlets? If not please explain?
Yes, we prefer option HG2

**Climate Change**

Q 52. How should the local plan consider the impact of renewable technologies? What types of effects should be assessed within the policy criteria?

We agree that locally specific criteria should be used to assess the impact of renewable technologies – these must include the impact on landscape and heritage.

**Landscape**

Q 55. Are there any other approaches that the Joint Local Plan could take to protect the landscape?

Whilst we do not object to Option L2, we consider that it can only be properly effective if the landscape character guidance is amended to include an assessment of sensitivity together with criteria based policies to manage development and mitigate its impacts. Therefore the findings of the ongoing Heritage Settlement and Landscape Sensitivity Assessment should be incorporated into an adopted management plan as part of the joint plan.

A specific policy protecting the AONB landscapes should be included in the Joint Local Plan. The Society refers you to the policy below and recommends that a similar policy is adopted in the Joint Local Plan to ensure that adequate protection of national landscape designations is made.

**POLICY ENV4 – DEDHAM VALE AREA OF OUTSTANDING NATURAL BEAUTY**

Development will only be supported in or near to the Dedham Vale Area of Outstanding Natural Beauty (AONB) that:

(i) Makes a positive contribution to the special landscape character and qualities of the AONB, including tranquillity;

(ii) Does not adversely affect the character, quality views and distinctiveness of the AONB or threaten public enjoyment of these areas, including by increased vehicle movement;

(iii) That there are no adverse impacts on the setting of the AONB which cannot reasonably be mitigated against and,

(iv) Supports the wider environmental, social and economic objectives as set out in the Dedham Vale AONB & Stour Valley Management Plan.

Applications for major development within or in close proximity to the boundary of the Dedham Vale Area of Outstanding Natural Beauty will be refused unless in exceptional circumstances and where it can be demonstrated that the development is in the public interest.
Where exceptional development is essential, landscape enhancements, mitigation or compensation measures must be provided to the Local Planning Authority's satisfaction. Any proposals affecting existing development that adversely affects the landscape qualities of the AONB, or its setting will be expected to satisfactorily mitigate this impact as part of any new development proposals.

Proposals for solar farm development or wind farms in or near the Dedham Vale AONB should have regard to the advice in the Council’s Guidance Note ‘Designing solar farm renewable energy development’ and in the ‘Dedham Vale AONB Position Statement Renewable Energy in the Dedham Vale Area of Outstanding Natural Beauty (March 2013).

The Council will also encourage proposals in or near the AONB to underground new infrastructure associated with electricity schemes, where financially viable, to help protect the high landscape qualities of the Dedham Vale. (Colchester Borough Council Draft Local Plan)

Q 56. Should additional protection be given to areas which form part of a landscape project area but which aren’t designated?

Yes – as informed by the findings of the ongoing Heritage Settlement and Landscape Sensitivity Assessment. The Stour Valley area under consideration for AONB status should be afforded additional protection in order not to compromise its special qualities.

Heritage

Q 57. How can the Joint Local Plan make the most of the heritage assets?

The Joint Plan must make a positive statement setting out the approach of the management of the historic environment, for example:

*Development will not be permitted that will adversely affect a listed building, a conservation area, historic park or garden or important archaeological remains. Development affecting the historic environment should seek to preserve or enhance the heritage asset and any features of specific historic, archaeological, architectural or artistic interest. In all cases there will be an expectation that any new development will enhance the historic environment in the first instance, unless there are no identifiable opportunities available. In instances where existing features have a negative impact on the historic environment, as identified through character appraisals, the Local Planning Authority will request the removal of the features that undermine the historic environment as part of any proposed development. Support will be given to the provision of creative and accessible interpretations of heritage assets.* Colchester Borough Council

Q 58. What level of protection should be given to identified non-designated assets? Are there any specific situations in which the balance should favour or not favour protection of identified non-designated assets?
The level of protection is set out in para 135 of the NPPF. A balanced judgement must always be taken which has regard to the significance of the heritage asset and the scale of any harm or loss.

Q 59. Should a more flexible approach toward climate change objectives be adopted where this would assist in protecting a heritage asset?

A balanced judgement must always be taken which has regard to the significance of the heritage asset and the scale of any harm or loss.

**Design**

Q 60. Is there any aspect of design that priority should be given to?

Priority should be given to investing in in-house Urban Design skills either through training or recruitment in this specialist area.

Q 61. Is there any aspect of design that should be introduced to the Councils’ policies?

Use of Design Codes and guides, use of the Suffolk Design Review Panel and strengthening of local plan policy to promote locally distinct design and/or a strong sense of place.

Q 62. Is there an area of design related to past development that you consider needs to be addressed in future development?

Future developments must prioritise locally distinct design and/or create a strong sense of place when dealing with volume housebuilders. This could be achieved by adopting supplementary planning documents on design and/or updating the Suffolk Design Guide as well as through increased use by the councils of the Suffolk Design Review Panel.

**Protection of Community Facilities**

Q 72. Through the Plan should any other areas of Local Green Space be identified and protected?

Yes – in conjunction with Parish Councils and/or Neighbourhood Plan groups.

**Settlement Boundaries**

Q 75. Do you consider the proposed new settlement boundaries to be appropriate?

Whilst we do not object to the principle of new settlement boundaries, we note numerous inconsistencies where some boundaries are drawn very tightly to the existing built form whereas others have excluded ‘infill’ sites which present themselves as developable. In
some cases gardens have been bisected by the boundary. Furthermore we are unclear as to why potentially suitable residential SHELAA sites have been excluded. The supporting text makes clear that this exercise has been carried out as a desk top exercise which is clearly not sufficiently thorough to give a robust and defensible set of outcomes. Further assessment of the potential SHELAA sites should be undertaken to refine the number of potential allocations. This should then be followed up by site survey work to determine defensible settlement boundaries which will provide confidence to developers and the community about the location of development.

Q 78. Do you consider the sites identified to be appropriate for allocation or inclusion within the settlement boundary?

SPS does not have available resources to examine and comment on the 750+ sites listed and mapped. Therefore we reserve the opportunity to comment in more detail on the shortlisted sites at a later plan stage. That said, all sites should be assessed in accordance with their landscape and heritage impact, together with their sustainability and proportionality to the host settlement.

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Director
10 November 2017