Suffolk Coastal Local Plan

Local Plan Examination
Hearing Statement

Matter 3: Area Specific Strategies – Development Allocations
(Rural Areas - Policy SCLP12.69: Land West of the B1125, Westleton)

On behalf of
Messrs F&S Winter of E.R. Winter & Son
<table>
<thead>
<tr>
<th><strong>Project:</strong></th>
<th>Suffolk Coastal Local Plan Examination Hearing Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Location:</strong></td>
<td>Land West of the B1125, Westleton</td>
</tr>
<tr>
<td><strong>Client:</strong></td>
<td>Messrs F&amp;S Winter of E.R. Winter &amp; Son</td>
</tr>
<tr>
<td><strong>Reference:</strong></td>
<td>404320/LS</td>
</tr>
<tr>
<td><strong>Version:</strong></td>
<td>FINAL</td>
</tr>
<tr>
<td><strong>Revision:</strong></td>
<td>V01</td>
</tr>
</tbody>
</table>
Contents

1.0 Introduction ..............................................................................................................................................1
2.0 Matter 3: Area Specific Strategies - Development Allocations ..............................................................4
3.0 Conclusion ..................................................................................................................................................9

Appendix 1: Housing Allocation, First Draft Local Plan 2018 (Policy SCLP12.65: Land west of the B1125, Westleton)
Appendix 2: Illustrative Masterplan, September 2018
1.0 Introduction

1.1 This Hearing Statement has been prepared by Savills (UK) Ltd on behalf of Messrs F&S Winter of E.R. Winter & Son, in respect of Land West of the B1125, Westleton.

1.2 The site, as identified in Policy SCLP12.69 is within the ownership of Messrs F&S Winter (E.R. Winter & Son). The ownership extends to a wider area of land which adjoins the site to the south.

1.3 The land is currently farmed in hand by the owners.

1.4 The site directly abuts the southern part of the village of Westleton. It measures 0.73 hectares in size. A larger area of land was previously identified as a housing allocation for 35 dwellings in the First Draft Local Plan 2018 (Appendix 1) with the following policy text:

“Policy SCLP12.65: Land west of the B1125, Westleton

2.1ha of land to the west of the B1125, Westleton, as shown on the Policies Map, is allocated for development of approximately 35 dwellings.

Development will be expected to accord with the following criteria:

a) Development of a mix of dwellings to include dwellings to meet the needs of older people;
b) Design and layout to create a focal point at the entrance to the village and to be sympathetic to the setting of Westleton Conservation Area and heathland on the opposite side of the B1125;
c) Affordable housing should be provided on site;
d) Provision of landscaping to provide a ‘soft’ edge to development on the southern and western boundaries;
e) Provision of pedestrian connection to existing footpaths to the village; and
f) A flood risk assessment will be required, and any necessary mitigation provided.”
1.5 A masterplan was submitted to the Council in September 2018 (Appendix 2) which showed how a high quality scheme could be brought forward which would be sympathetic to the character of the village, including Westleton Common, heathland and Conservation Area which are on the opposite side of Reckford Road.

1.6 Key details included within the layout included:

- Vehicular access via Reckford Road.
- New pedestrian link into the village.
- A combination of market buildings and landscaping creating a new entrance space to the development.
- Potential market/focal building or architectural detail points throughout.
- Landscaped frontage along Reckford Road responding to the Special Landscape Area of Westleton Common and for use as possible water attenuation.

1.7 The Final Draft Local Plan (Regulation 19) was published in early 2019, the allocation had been reduced from 2.1Ha (35 units) to 0.73Ha (20 units), with a new site (SCLP12.70: Land at Cherry Lee, Westleton) being proposed to the north of Westleton. The Council noted at the time that that two smaller allocations would be preferable to a single, larger site in the village.

1.8 We are submitting this Hearing Statement to build upon our previous submission and to respond directly to the MIQ’s set out below:

Rural Areas - Policy SCLP12.69: Land West of the B1125, Westleton

- 3.99 In the context of the proposed community led housing schemes, is the scale of development proposed at Westleton justified?
- 3.100 Is the provision of dwellings designed to meet the needs of the older population justified and would the Policy be effective in this regard?
- 3.101 What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Westleton Water Recycling Centre?
3.102 Would criterion e) be effective in safeguarding the characteristics of Westleton Common County Wildlife Site?

3.103 Is there any reason that the proposed allocation would not be deliverable or developable as per the definitions in the Framework?
2.0 Matter 3: Area Specific Strategies - Development Allocations

Rural Areas

Policy SCLP12.69: Land West of the B1125, Westleton

3.99 In the context of the proposed community led housing schemes, is the scale of development proposed at Westleton justified?

2.1 Westleton has received limited growth in recent years. It is identified as a Small Village where the principle of proportionate development is supported as a policy approach in the Draft Plan. The level of growth is supported, as a minimum, based on the sustainability of the village, which includes a post office and two public houses.

2.2 It is noted that community-led housing schemes are proposed in the village which are to be welcomed. An application was submitted in July 2019 for a ‘senior cohousing scheme’ at Glebe Meadow, Westleton of 20 dwellings. The application is due for determination in October 2019. This scheme is considered to represent ‘specialist housing for older people’ and whilst it meets an identified local need, its provision is restricted in terms of the contribution it can make to meeting wider housing targets.

2.3 Allocating a range of sites, including SCLP12.69 would ensure flexibility in delivery and provide certainty to the authority that the growth levels of the village can be met should the delivery of any of the community-led schemes or other allocations be delayed.

2.4 As noted in our submissions on behalf of our client, in the case of SCLP12.69, a site has been put forward which has a high degree of certainty in terms of delivery when considered against the site assessment tests within the NPPG (Paragraph: 019 Reference ID: 3-019-20140306; Paragraph: 020 Reference ID: 3-020-20140306; and Paragraph: 021 Reference ID: 3-021-20140306).
2.5 In addition, the amount of affordable housing to be provided within the Glebe Meadows scheme is unclear and the planning application itself notes that this would be below the requirements of planning policy. Occupancy of the dwellings in the Glebe Meadows scheme are also proposed to be restricted to the over 65s. Therefore, there remains a need for open market housing within the village which would ensure that a mixed, sustainable community is maintained with the potential for units for households and families throughout their lifetimes.

3.100 Is the provision of dwellings designed to meet the needs of the older population justified and would the Policy be effective in this regard?

2.6 It is unclear why this site specifically has been selected for the provision of housing to meet the needs of the older population in Westleton.

2.7 In terms of meeting housing needs, it is considered that a flexible approach to tenure/occupants would be most suitable, enabling the site to come forward for development in accordance with market demand. Whilst it is acknowledged that there is a need across the District for housing for older people, it is unclear why this site has been specifically identified within the village to include older people’s housing. The other proposed allocation (Policy SCLP12.70: Land at Cherry Lee, Darsham Road, Westleton) is not affected by the same requirement.

2.8 The evidence base examines the need for older people’s accommodation at a strategic level but does not contain any detailed information at a settlement level, nor in relation to specific sites. It is therefore considered that the policy approach in relation to the requirement for older people’s housing on this allocation only in Westleton is not justified.

2.9 In addition, the Local Plan makes reference to the aspiration for 50% of dwellings in developments of 10 dwellings or more to meet the standards in relation to accessible and adaptable dwellings (Part M4(2)) of the Building Regulations. Whilst this commitment is to be respected, it does not appear that the Council are proposing to apply this consistently across the village, seeking only to put this requirement in Policy SCLP12.69 and not SCLP12.70 (Land at Cherry Lee, Darsham Road, Westleton) which is proposed for 15 dwellings.
For the reasons set out above, it is also considered that the proposed policy approach for Westleton would not be effective. To deliver the housing requirement for the village, it is important that the policy remains flexible and able to respond to the local market. Ensuring there is accommodation for people throughout their lives is vital to creating sustainable and mixed communities.

In addition, the current application at Glebe Meadows proposes 20 units of accommodation which are targeted at the over 65s and as such, there is no further justification for this policy requirement to also be extended to Land West of the B1125.

As set out within our previous representations in March 2019, my client has concerns about the change in approach to site allocation in Westleton, from one larger allocation on land to the west of B1125 for 35 units, to two smaller allocations.

It is considered that providing an allocation for 35 dwellings on land west of the B1125 (SCLP12.69) Westleton presents a viable and achievable approach to growth. Site preparation costs are generally the same for equivalent allocations, and therefore cost efficiencies can be achieved on larger schemes. This is important when striving for higher standards such as those proposed in the Plan to meet Part M4(2)) of the Building Regulations. As a result, larger sites will be more attractive to a wider range of development partners which is an important factor in ensuring that allocated sites are delivered in a timely manner, within the first five years of the plan.

What are the implications for the deliverability or developability of the site given the stated treatment limitations at the Westleton Water Recycling Centre?

It is considered that this matter would relate to the development management process and further technical work should be able to identify a solution. This is sufficiently addressed in criterion h of the policy.

Would criterion e) be effective in safeguarding the characteristics of Westleton Common County Wildlife Site?

Criterion e) states:
“e) Development should provide for biodiversity enhancements, in line with the characteristics of Westleton Common County Wildlife Site;”

2.16 It is considered that the wording as drafted would be sufficient to meet the criteria of the policy. Any planning application prepared for this site would need to demonstrate that ecological and biodiversity matters have been suitably considered in accordance with appropriate legislation, including that within The Conservation of Species and Habitats Regulations 2010 and Wildlife and Countryside Act 1981 (as amended). This would therefore be addressed by way of appropriate protected species surveys and the implementation of appropriate mitigation, undertaken and produced by a CIEEM registered ecology consultants. Where possible, biodiversity net gains would be sought in line with the NPPF.

3.103 Is there any reason that the proposed allocation would not be deliverable or developable as per the definitions in the Framework?

2.17 A response to these is set out in our previous representations, March 2019. The site is considered to be suitable, available and achievable for development in accordance with the guidance of the Framework. A summary is provided below:

**Suitable**

2.18 The site is immediately adjacent to Westleton’s settlement boundary and as such is well related to its existing built form. Allocating the site for housing would not appear out of character with the existing built form, providing a natural extension to this part of the settlement.

2.19 There are no known physical limitations or constraints on the site which would make development of the site difficult or unacceptable. The site is not located within protected areas such as Greenbelt, AONB or Flood Zones 2 and 3. Environment Agency surface water flood mapping indicates that a small section of the site is susceptible to surface water flooding.
2.20 The site can therefore present a suitable location for the managed growth of Westleton, particularly given its relationship with the existing village. It is of an appropriate scale in relation to the form of the village, and as such, this site presents an opportunity to create an attractive and sympathetic development within a sustainable settlement.

*Available*

2.21 The site is considered available for development being within the control of a single owner. Should the site be accepted as an allocation for residential development, Savills would be able to act on our client’s behalf to take the sites forward with a view to identifying a suitable development partners as soon as possible.

*Achievable*

2.22 As noted above, there are no known technical constraints relating to the site and therefore it is considered its development would be economically viable. Services including electricity, mains water, foul sewerage and telecommunications are easily connectable and readily available.

2.23 There are no other known factors that mean development of the site would be difficult or unacceptable. Therefore, it is clear that this site presents a deliverable option for housing in Westleton and could make a material contribution to the housing targets of the District.
3.0 Conclusion

3.1 Within the context of the comments above, it is considered that Policy SCLP12.69: Land West of the B1125, Westleton presents a deliverable housing site within Westleton which provides the opportunity for 20-35 dwellings in the village. It is a site which could deliver a mixed housing scheme which responds to its context and makes a valuable contribution to the housing targets of the district.
Appendix 1: Housing Allocation, First Draft Local Plan 2018 (Policy SCLP12.65: Land west of the B1125, Westleton)
12.483 Westleton (2011 pop. 349) is identified as a Small Village in the settlement hierarchy due to the range of services and facilities it has including a shop and a village hall.

12.484 The site is situated on the southern edge of the settlement and is presently in agricultural use. The site is relatively prominent in the landscape and adjoins the Westleton Conservation Area to the north east of the site. This provides an opportunity for development to create an attractive gateway development to the village. There is a footpath on the eastern side of Rectford Road, and pedestrian connectivity with the footpath should be provided as part of the development.

12.485 Due to the connectivity of the site to the village centre and the prominent location of the site which provides an opportunity for creating a focal point on the entrance to the village, development on the site should incorporate dwellings that would be suitable to meet the needs of older people as part of a mix of dwellings.

12.486 Due to the prominent location of the site, landscaping will be required in order to provide a 'soft' edge to the southern and western boundaries of the site. In relation to heathland to the west on the opposite side of the B1125, it is important to consider indirect effects resulting from adjacent land use changes such as increases in recreational pressure.
12.487 An area of surface water flooding is recorded along the northern and eastern boundaries of the site. Any development in this area of the site will need to demonstrate mitigation measures designed to alleviate the potential surface water flooding risks. This is required to be undertaken in accordance with the surface water management hierarchy.

12.488 Habitat Regulations Assessment screening has identified the need for Appropriate Assessment to be undertaken as part of the production of the Local Plan which will identify whether any mitigation measures will be necessary.

12.489 Additional primary care floor space will be required in Yoxford to meet the needs arising from new development, as detailed in the Infrastructure Delivery Framework.

Policy SCLP12.65: Land west of the B1125, Westleton

2.1ha of land to the west of the B1125, Westleton, as shown on the Policies Map, is allocated for development of approximately 35 dwellings.

Development will be expected to accord with the following criteria:

a) Development of a mix of dwellings to include dwellings to meet the needs of older people;

b) Design and layout to create a focal point at the entrance to the village and to be sympathetic to the setting of Westleton Conservation Area and heathland on the opposite side of the B1125;

c) Affordable housing should be provided on site;

d) Provision of landscaping to provide a ‘soft’ edge to development on the southern and western boundaries;

e) Provision of pedestrian connection to existing footpaths to the village; and

f) A flood risk assessment will be required, and any necessary mitigation provided.
Appendix 2: Illustrative Masterplan, September 2018