HEARING STATEMENT

Examination of the Suffolk Coastal District Local Plan

On behalf of:

RH & R Paul

In respect of:

Matter 4: Policies

Date:

July 2019

Document Reference:

GA/DJ/01019/S0002
1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of our client RH & R Paul in respect of Matter 4: Policies of the Inspector’s Matters, Issues and Questions for the Examination of the Suffolk Coastal District Local Plan. It responds to the questions raised by the Inspector relating to Policy SCLP5.4: Housing Clusters in the Countryside.

1.2 The Statement is intended to assist the Inspector’s consideration of the soundness of the Plan without repeating the representations already submitted on behalf of our client to the Local Plan Final Draft consultation (Comment ID: 1341). It will form the basis of our discussion points at the Examination Hearing session on 21st August 2019.

2. ISSUE – ARE THE INDIVIDUAL POLICIES CLEAR, JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY AND WILL THEY BE EFFECTIVE?

Housing Policies

Policy SCLP5.4: Housing Clusters in the Countryside

Question 4.1
Is the Policy consistent with national policy as set out in paragraph 78 of the Framework and what is the expected contribution to housing supply that would result from the Policy?

2.1 As set out in our hearing statement for RH & R Paul to Matter 2C, there is a clear need for sustainable residential development to come forwards in rural areas of the District. This need is set out at paragraph 3.3 of the Topic Paper: Site Selection (Examination Document Reference D34) which highlights the fact that a significant number of consultation responses identified the need to direct more growth to the rural areas, stating that the current strategy of restricting growth in rural areas is becoming detrimental to rural communities – seen through the increased closure of local services and facilities. The need for rural growth is also translated into the Local Plan’s stated strategy for rural area’s at Policy SCLP12.34, that seeks to deliver new homes which contribute to providing a mix of housing choice in rural areas and help to sustain rural communities.

2.2 In terms of whether Policy SCLP5.4 is consistent with paragraph 78 it is clear that there is a need for development in rural areas, but paragraph 78 also requires development to be located where it will enhance or maintain the vitality of rural communities and provide opportunities for villages to grow and thrive. In this respect, while there is recognition at paragraph 78 that development in one village may support services to support services in a village nearby (where there are groups of smaller settlements), it is clear that the paragraph primarily seeks to encourage development in settlements
that have existing services that would be supported by additional housing.

2.3 Policy SCLP5.4 is clearly consistent with paragraph 78 in allowing small scale development in clusters where development would support services nearby, but when it comes to slightly larger settlements that have existing services, but which have not been identified as small villages in the Final Draft Plan, it is clear that the policy would fail to provide the level of development required to make a difference to the sustainability of these settlements.

2.4 As set out in our previous representations, the restriction placed on developments of up to 5 dwellings within clusters of at least ten dwellings clearly ignores the scale of settlements that are included in the Countryside by Policy SCLP3.2. Many of these villages have clusters of more than 50 homes and support existing services. For example, Stratford St Andrew has convenience store, 21 of the villages in the countryside including Sutton, have a pub and the majority have a community hall, church and library services. In these villages, developments of more than 5 dwellings would be of real benefit in supporting local services. In order to ensure the policy is in full accordance with paragraph 78, we therefore consider that the policy should be amended to allow up to 10 dwellings within clusters of at least fifty dwellings as set out in our previous representations.

Question 4.2
Is the Policy clear and unambiguous and is it evident how a decision make should react to a development proposal for housing development in an existing ‘cluster’ in the Countryside?

2.5 No. There are several points that need clarifying further:

- A cluster is defined as a “continuous line of existing dwellings or a close group of existing dwellings”. How close do dwellings need to be to one another to be considered part of the same cluster. This is important as development is allowed within “a clearly identifiable gap within an existing cluster” and the size of the gap will therefore determine whether development is allowed there or not.

- How is an extension of the built up area beyond its existing extent defined? Additional parameters would be useful here as all development on greenfield sites would meet this definition.

- How would support from the local community be demonstrated. Many clusters will be part of larger parishes, but may be separated from the main village by some distance. Would parish support be required? Or would the support of neighbouring residents be needed? And if so, what if one neighbour approves and the other doesn’t? These questions clearly demonstrate the futility of this requirements set out below.

Question 4.3
Is it justified to require that a scheme is supported by the local community? Is the Plan clear as to how such support should be demonstrated?

2.6 No. As set out in our previous representations, this requirement would neither be justified nor effective
in delivering the sustainable growth required in these settlements. The requirement is overly restrictive and will simply serve to prevent otherwise sustainable development that it objected to by neighbours. A requirement to meet local needs is appropriate and demonstrate meaningful and effective engagement with local people is appropriate, but securing the support of the local community will render this policy ineffective at delivering new homes and is therefore unsound.