SUFFOLK COASTAL LOCAL PLAN EXAMINATION

HEARING STATEMENT: MATTER 4 (POLICIES)

LAND ADJACENT TO SUDBOURNE BAPTIST CHURCH, SCHOOL ROAD, SUDBOURNE (SITE 508)

ON BEHALF OF SOLE BAY DEVELOPMENTS LTD

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) PLANNING AND COMPULSORY PURCHASE ACT 2004
CONTENTS:

1. INTRODUCTION .................................................. 1
2. MATTERS, ISSUES AND QUESTIONS ....................... 2
3. CONCLUSION ..................................................... 3
1. **Introduction**

1.1 Representations were submitted by Pegasus Group on behalf of our client, Sole Bay Developments Ltd, to the Regulation 19 consultation on the Suffolk Coastal Final Draft Local Plan. Our client has land interests in the centre of Sudbourne, adjacent to the Baptist Church. The representations related to this Matter were allocated Representation IDs 1001, 1003, 1006 and 1011.

1.2 This Hearing Statement responds to the Inspectors’ Questions circulated on 24th June 2019, covering Matter 4 – Policies: *Are the individual policies clear, justified, consistent with national policy and will they be effective?*

1.3 Our representations and this Hearing Statement are in relation to the following housing policies:

   SCLP5.4 Housing clusters in the countryside
   
   SCLP5.8 Housing mix
   
   SCLP5.10 Affordable housing on residential developments
   
   SCLP5.11 Affordable housing on exception sites.
2. **Matters, Issues and Questions**

2.1 In light of the above, we respond to the Inspector’s question as follows:

**SCLP5.4 Housing clusters in the countryside**

2.2 Our original representation in relation to this policy is pasted into the box below for convenience:

This policy acknowledges that dwellings can be accommodated within clusters of existing development or on sites that infill a gap in an otherwise built up frontage. However, part a) is very prescriptive in setting numbers of dwellings rather than applying common sense and a response to the local scenario. Additionally, it states that the cluster should be “well related” to a settlement in the hierarchy, without defining “well related”. The policy is therefore not effective, and is inconsistent with national policy at NPPF paragraph 77 which requires policies and decisions to be responsive to local circumstances (rather than a prescriptive number) and paragraph 78 which requires housing in rural areas to be located “where it will enhance or maintain the vitality of rural communities”. As previously stated, site 508 provides the opportunity to improve the vitality of Sudbourne by facilitating the provision of housing appropriate to those wishing to stay in the village through downsizing or new household formation, adding to the mix of population through providing and freeing up family housing, and thus supporting and introducing local businesses and services.

2.3 The Policy includes the AONB in its reference to the Countryside, albeit that it notes that specific care will be taken in sensitive locations. The policy requires a scheme of more than 3 units to have the support of the local community and that the mix of dwellings would meet locally identified needs.

2.4 By way of context, the AONB covers an extensive area of the District, and site 508 falls within a village that lies at the heart of the AONB. Villages in the AONB and the wider countryside without settlement boundaries, are at risk of being stifled of any development. New residential development is not anticipated by policy SCLP3.3 (settlement boundaries) unless specific policies of the Plan indicate otherwise. Such developments would be classed as windfall sites, acknowledged in Policy SCLP3.2 as coming forward in accordance with other policies. Table 3.5 anticipates windfall sites contributing 50 dwellings per year across the District, “with the greater development opportunities provided by Policy SCLP5.4”  Other
than infill sites (Policy SCLP5.7), the Housing Clusters policy (SCLP5.4) is the only policy that allows for any market housing to be provided in the countryside.

2.5 In this context, Policy SCLP5.4 is extremely limiting without any justification for the numbers chosen. Restricting cluster development to 3 dwellings suggests that 5 dwellings, or 10, would somehow undermine the spatial strategy or be unsustainable, which is not always the case. The policy is not justified or effective in this respect.

2.6 In the AONB in particular there may be very few opportunities to provide housing under the cluster policy and still protect its important character. Given the extent of the AONB, as shown below, the risk is that villages without a settlement boundary will be prevented from growing in a way that will support the vitality of the community, and that this potential for lack of turnover will pervade across a wide area. As a result, rural communities will be ageing at a greater rate than other villages, with little new influx of population that can support local facilities and services that those existing communities rely on, including shops, services, and buses.
2.7 NPPF paragraph 77 requires policies and decisions to be responsive to local circumstances. Site 508 lies at the heart of the village of Sudbourne, where development would not result in the spread of built form into the wider countryside. Its development would provide a rare opportunity to support the vitality of the community through new population. The number of units that can be accommodated on the site should be determined in response to local circumstances, i.e. impact on amenity, character and technical considerations, rather than be restricted to an arbitrary number.

2.8 Sudbourne should be provided with a settlement boundary, as in our representations on other policies, but whether or not that occurs, Policy SCLP5.4 should be worded to apply logic to the consideration of clusters, in order to maximise the opportunities to continue low-level growth in the countryside and AONB.

2.9 The requirement for the support of the local community and that the mix of dwellings should meet locally identified needs is not justified and is not consistent with national policy. Local communities often acknowledge the need for “new blood” to support the continued viability of services and facilities and to support new ones, such as broadband and services provided by people working from home. However, there are inevitably elements of the population who object to any new development at all. Their desire to preserve their status quo should not undermine the Government’s requirement to boost significantly the supply of housing.

2.10 Local need for market dwellings is not identified in the way that the need for social rented housing is measured. Market housing is provided in a mix that responds to market demand. Developers do not build houses that are so small or large that they won’t sell. The paragraph of the policy which commences “Where more than three...” should therefore be omitted from the policy as it is not justified, effective or consistent with national policy.

**SCLP5.8 Housing mix**

2.11 We rely on our original representation in relation to this policy, which is pasted into the box below for convenience:
The requirement for a set mix of house sizes is inconsistent with national policy, where NPPF paragraph 77 requires that policies and decisions should be responsive to local circumstances. The market demand for a particular type or size of dwelling will vary over time and across the District. The restrictive nature of the policy will not help to deliver housing over the plan period and is therefore ineffective.

2.12 In particular, smaller developments are unlikely to undermine the Council’s desire for mixed and balanced communities.

SCLP5.10 Affordable housing on residential developments

2.13 Our original representation in relation to this policy is pasted into the box below for convenience:

This policy refers to development of 10 or more units, whereas national policy requires affordable housing at more than ten units, i.e. 11 or more. By also setting a size threshold the plan adds an additional threshold which fails to acknowledge local circumstances such as the density character of the area. It is therefore inconsistent with national policy. It is also not justified, since the plan does not evidence the need to deviate from national policy.

2.14 There is an error, however, in that national policy relates to 10 or more units as per this proposed policy, and we do not intend to pursue this objection.

SCLP5.11 Affordable housing on exception sites.

2.15 We rely on our original representation in relation to this policy, which is pasted into the box below for convenience:

This policy states that where Starter Homes are proposed, these should form part of a mix of tenures on the site. The NPPF defines Starter Homes as affordable housing (glossary). They should not therefore be distinguished from other forms of affordable housing in applying the policy. The policy is therefore not consistent with national policy for this reason.
3. Conclusion

3.1 This Statement sets out why the Local Plan policies noted are not justified, effective or consistent with national policies. The interpretation of the policies in a planning application scenario would result in applications within countryside locations that would support and benefit from new housing without detriment to character and amenity being refused for not adhering to rigid numerical limits, house sizes, and/or prioritising individual interests over a wider need.

3.2 We have argued for the allocation of site 508 and the provision of settlement boundary for Sudbourne in relation to other policies of the plan, in our original representations, which we understand will be taken in to account in the Inspector’s assessment. In relation to this Matter it is clear that the housing policies fail to meet the requirements of national policy to boost significantly the supply of housing, by inappropriately constraining development that would otherwise be considered to contribute the sustainable growth of rural communities.

3.3 We therefore reiterate the conclusion of our main Representation that Sudbourne is a community that should continue to grow at an appropriate rate in order to continue to thrive. To facilitate appropriate development in the countryside, Policy SCLP5.4 should be amended by omitting sub-paragraph a) and the paragraph commencing “Where more than three...”.

3.4 Additionally, Policy SCLP5.8 should omit the first two paragraphs (the table referred to would remain as guidance).