

Our Ref: G08
Your Ref:

Date: 18th November 2021

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The Planning Inspectorate

(sent via e-mail to annette.feeney@baberghmidsuffolk.gov.uk)

Dear Inspectors,

Babergh and Mid Suffolk Joint Local Plan Examination – Additional work to be undertaken

1.01 Further to the Babergh and Mid Suffolk Joint Local Plan (JLP) Hearing sessions held in the week of 18th October 2021, regarding Matter 4 – Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process, and Matter 2 – Gypsy and Traveller, and Travelling Showpeople Provision and Boat Dwellers, this letter sets out the scope of additional work the Councils propose to undertake with a view to addressing the concerns raised by Inspector Rivett during those Sessions.

Matter 4 – Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process

2.01 The scope of the additional work to review the appropriateness of the spatial strategy and the site selections will be kept within the parameters of the sites which were submitted as part of the Plan making process. This reflects the fact that the concerns relate to the 'soundness' of the submitted Plan. Therefore, the review will only be for residential sites which are registered to the Councils' Strategic Housing and Economic Land Availability Assessment (SHELAA) process as at the publication of the Regulation 19 Joint Local Plan (Nov 2021) – including the additional land at Great Blakenham referenced in Core Library Document G03 and G04, which was submitted at that time, but unfortunately was omitted from the original SHELAA process.

2.02 The Councils believe it is appropriate to constrain further assessment to the top three tiers of the settlement hierarchy (noting the changes to the hierarchy which were accepted to Great Waldingfield and Stoke by Nayland at the Matter 4 Hearing sessions). This would involve reviewing rejected SHELAA sites in the Ipswich Fringe, Market Towns and Urban Areas, and Core Villages across both districts. It will also re-consider suitable SHELAA sites in those tiers which were reduced in the Councils' assessment from their original scale as submitted at the SHELAA stage. This is proposed as a



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proportionate and justified approach as the Plan generally identifies these locations as the most sustainable locations and where the largest levels of growth should take place. The Councils estimate that approximately 250 rejected SHELAA sites will be re-considered under this method (approximately 300 sites in total were considered suitable in the original SHELAA exercise). The Councils consider it would be disproportionate to re-assess the approximately 350 rejected SHELAA sites in the lower tiers of the settlement hierarchy, having regard to the poorer sustainability credentials of those tiers.

- 2.03 Following the initial rejected SHELAA sites review, any sites which are identified as potentially suitable, will be considered further on a consistent basis through additional specialist evidence testing on heritage impact, landscape impact, highways suitability, infrastructure, flood risk and water quality/capacity. The findings of the additional testing will be considered in the final SHELAA suitability assessment.
- 2.04 Any sites which are then identified as suitable, will then be subject to Sustainability Appraisal (SA) to enable a comparable assessment to be made for each site, including the original sites assessed in the Submission Plan. Sites will be assessed on a parish by parish basis to retain consistency with the earlier assessment work.
- 2.05 An increasing and considerable volume of the objective housing needs can already be met by consented developments which the Councils believe is an important known aspect of future supply and is accordingly planned with infrastructure providers. Such consented developments form part of the baseline supply essentially because the Plan cannot withdraw existing consents. However, the Councils have noted some concerns as to whether a consent is a sufficient basis for an allocation. The Councils intend to review the planning status of all registered SHELAA sites up to the end of September 2021. Any SHELAA site (as the source for considering JLP allocations) either with extant planning permission or authority to approve subject to a S106 agreement at 30th September 2021 will be identified as a committed site for the purposes of the housing supply in Policy SP04. The Councils will consider what the implications may be of removing the identified committed sites (up to 30th September 2021) as allocations from the Plan.
- 2.06 Netting off all committed sites updated as above, the Councils propose to re-consider the spatial distribution options in the SA. This will involve consideration of the new residual SHELAA capacity following the review work on previously rejected SHELAA sites. Any reasonable alternatives can be tested again through SA, which may also identify reasonable alternative options within the settlement hierarchy categories such as the Ipswich Fringe or Core Villages.
- 2.07 Following the conclusion of the above work on both site assessment and spatial distribution reviews, the Councils will confirm the position regarding the justification for the spatial distribution pattern and allocation of sites in the Plan. The Councils will continue to present the information separately for each district, reflecting the approach taken in the preparation of the Plan.



Matter 2 – Gypsy and Traveller, and Travelling Showpeople Provision and Boat Dwellers

3.01 The Councils outline below the scope of additional work to be undertaken, having had regard to the relevant representations to the Matter 2 Hearing issues. The Councils will engage further will relevant parties prior to commencement of the work with a view to producing Statements of Common Ground.

- i. Update the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (May 2017) [Document EH03](#) for Babergh and Mid Suffolk Districts.
 - a) Using the methodology to assess accommodation needs in Chapter 6 (Gypsy and Traveller), Chapter 8 (Travelling Showpeople) and Chapter 10 (Boat Dwellers).
 - b) The update will need to consider the needs of both Gypsies and Travellers who meet the definition as set out in the Government's Planning Policy for Traveller Sites (Aug 2015) [Document C11](#) and those that do not.
 - c) An assessment of caravan dwellers will need to be undertaken.
 - d) Consider the data sources and evidence submitted to the JLP Examination.
 - e) Confirm needs from unauthorised developments in the Districts.
 - f) Seek to agree the approach with those involved in the JLP Examination, explaining how the needs of people who are homeless and living roadside and in homes are accounted for, together with net movement from housing and net movement into the area. References to the Councils' Strategic Housing Market Assessment – Part (May 2017) [Document EH02](#) and Partial Update (Jan 2019) [Document EH05](#).
 - g) Prepare Statements of Common Ground with the Showman's Guild and Matter 2 Hearing participants.
- ii. Undertake an exercise to identify sites for allocation to meet identified needs.
 - a) To meet the five-year supply of specific, deliverable sites, and a supply of specific, deliverable sites or broad locations for growth for the plan period in accordance with the Planning Policy for Travellers Sites.
 - b) Call for Sites exercise.
 - c) Review of existing site capacity.
 - d) Review of Council-owned land and identification of land.
 - e) Collaborative approach with partner authorities and agencies in addressing short-stay transit provision and policy approach.



- f) Review potential for net additional capacity for houseboat moorings.
- iii. Develop a proactive criteria-based policy for Gypsy and Traveller, and Travelling Showpeople proposals, to support appropriate development for those who both meet and do not meet the definition set out in the Planning Policy for Traveller Sites.

Matter 8 – Healthy Communities and Infrastructure Policies

4.01 The Councils are undertaking a factual review of all the open spaces identified within the Joint Local Plan together with those identified at the Regulation 19 stage and during the Examination.

4.02 By way of an example, the information will be formatted and presented in a tabular form as the example below identifies.

Name (including map links)	Parish	District	Typology	Area (ha)	Source and Description
Stone Street Park	Crowfield	Mid Suffolk	Parks and Recreation Grounds	0.63	Amendment to existing Local Plan designation. Park with children’s play area and Multi Use Games Area (MUGA) for informal football and basketball.

Matter 9 – Allocation Sites for Housing and Other Development and Settlement Boundaries

5.01 The Councils recognise the additional tasks required for Matter 9 that are included in the proposed programme of work, namely a review of the appropriateness of specific settlement boundaries in respect of:

- a) recent permissions for development outside settlement boundaries;
- b) any made or likely soon to be made Neighbourhood Plans which allocate sites outside settlement boundaries; and
- c) representations objecting to settlement boundaries in specific locations.

5.02 The Councils will also review the site allocation policies to ensure a consistent approach to the number and detail of policy criteria, engaging with site promoters and statutory consultees who are objecting to the criteria.

5.03 The Councils anticipate that this work can be undertaken in parallel with the work to be undertaken on Matters 2, 4 and 8.

Other Matters

6.01 In addition to the specific Matters set out earlier in this letter, the Councils continue to address all the actions arising from the respective Examination Hearing sessions and will complete these tasks alongside the additional work identified.



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Timescale

Task	Duration	Description
Matter 4 – Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process – up to 12 months		
1) Review of Strategic Housing and Economic Land Availability Assessment (SHELAA)	Two months	Initial review of discounted sites in the three top tiers of the settlement hierarchy.
2) Specialist evidence updates for Matter 4 – Spatial Distribution and Site Selection	Four months to six months (to be determined)	Specialist evidence updates to follow the initial review of discounted sites. Timings depended upon if more detailed assessments are required.
3) Sustainability Appraisal	Four months	To follow specialist evidence assessments.
4) Review of Sustainability Appraisal findings and Councils' statements	Two months	To follow Sustainability Appraisal.
Matter 2 – Gypsy and Traveller, and Travelling Showpeople Provision and Boat Dwellers – six months		
5) Gypsy and Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) update (including Caravan Dwellers Needs)	Three months	To update the current identified needs.
6) Assessment of sites for Gypsy and Traveller provision	Six months	To be undertaken alongside and after the ANA update.
7) Review potential for net additional capacity for houseboat moorings	Six months	To be undertaken alongside and after the ANA update.
Matter 8 – Healthy Communities and Infrastructure Policies – four months		
8) Factual review of open spaces identified in the JLP plus sites identified at Regulation 19 stage and through Examination	Four months	Site visits to be undertaken.
Matter 9 – Allocation Sites for Housing and Other Development and Settlement Boundaries – six months		
9) Appropriateness of specific settlement boundaries	Six months	Conclusion of this task has a dependency upon Matter 4 work.
10) Review site allocations policy criteria	Six months	As set out in paragraph 5.02.



6.02 We trust this would be an acceptable way forward to you and we look forward to discussing this proposed programme of work further with you.

Yours sincerely



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