**BMSJLP CONSULTATION OCTOBER 2017**

**SPROUGHTON JLP WORKING GROUP**

**SUGGESTIONS FOR RESPONSES QUESTIONS 7-15 (INC)**

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**Q7: Do you agree with the proposed approach set out under option HR1? If not, please explain why and what alternatives you propose.**

**Suggested Answer**: **NO**.

The housing need identified in the Strategic Housing Market Assessment 2017 (SHMA) may well be overstated for the District during the life of the JLP. The report methodology uses historic patterns of migration, extrapolated forwards to arrive at a projected population growth, but no regard seems to be have been had for the likely effects on both domestic and overseas migration of the UK leaving the EU in 2019. This, and the intended tightening of immigration controls, is likely to quickly and significantly reduce the amount of inward migration and significantly increase the amount of outward migration in the District further, almost at the same time as the JLP itself is adopted. These effects are likely to reduce the forecast need for new housing during the life on the JLP.

Additionally, the potential relocation of major industries to continental Europe if a “hard” Brexit is the outcome of current negotiations is likely to further reduce demand for housing in the District and surrounding areas. Projected employment growth in the District is in the Professional and Business services sectors which may be especially vulnerable to relocation. Given the uncertainty on Brexit and levels of overseas migration, and with emphasis on the “Northern Powerhouse” and HS2, outward domestic migration could increase significantly with employment opportunities being created along the HS2 corridor rather than in East Anglia. This would reduce demand for housing in the District still further.

These potential impacts are real and significant. The JLP must take the most likely possibilities into account and be based on revised data.

The application of a “market signals uplift” is discussed in the SHMA (pp53-64). The consultants are clear that in the absence of any guidance other than an uplift should be “*reasonable*”, a “judgement” is required. Their judgement (para 6.54 on page 63) in the case of Babergh is that a 15% uplift should be applied. Comparing the narrative summary of the case in Babergh with that of Suffolk Coastal on p64 (also judged at 15% uplift) the judgements do not seem to be equal and the uplift seems excessive in Babergh by comparison with Suffolk Coastal. All other Districts are judged at 10%.

The consultation document does not explain in simple enough detail how a projected population increase over the period of the JLP in Babergh of 8086 persons translates into an OAN of 7820 dwellings. In order to be able to comment effectively, it is important that the council’s case is clearly stated in ways people can readily understand. The total dwelling figure seems incongruent with other evidence in the SHMA: the fact that over the period 2001-2015, both overseas migration and natural change were negative, and a past average occupancy of 2.3 persons per dwelling.

The JLP should also have an in-built flexibility so that the housing need can be regularly reviewed against forecasts during the life of the plan to 2036 and adjusted to take account of significant changes in demand which affect the amount, type and location of housing during that time.

* The housing need identified in the consultation document may well be overstated.
* No regard seems to be have been had in the document for the likely effects of the UK leaving the EU in 2019 on both domestic and overseas migration.
* The end of free movement in the EU is likely to quickly and significantly reduce the amount of inward migration and significantly increase the amount of outward migration.
* The potential relocation of major industries to continental Europe if a “hard” Brexit is the outcome of current negotiations is likely to further reduce demand for housing in the District and surrounding areas.
* Projected employment growth in the District is in the Professional and Business services sectors which may be especially vulnerable to European relocation.
* The uncertainty on Brexit and levels of overseas migration, and with emphasis on the “Northern Powerhouse” and HS2, outward domestic migration could increase significantly with employment opportunities being created along the HS2 corridor rather than in East Anglia. This would reduce demand for housing in the District still further.
* These potential impacts are real and significant. The JLP must take the most likely possibilities into account and be based on revised data.
* The “market signals uplift” in the report seems excessive in Babergh by comparison with Suffolk Coastal. All other Districts are judged at 10%.
* The consultation document does not explain in simple enough detail how a projected population increase over the period of the JLP in Babergh of 8086 persons translates into an OAN of 7820 dwellings.
* In order to be able to comment effectively, it is important that the council’s case is clearly stated in ways people can readily understand.
* The total dwelling figure seems at odds with other evidence in the document
* Over the period 2001-2015 both overseas migration and natural change were negative
* The past average occupancy was 2.3 persons per dwelling. The projected average is 1.03 persons per dwelling.
* The JLP should have an in-built flexibility so that the housing need can be regularly reviewed against forecasts during the life of the plan to 2036 and adjusted as necessary.

**Q8: When allocating sites, what scale of contingency should be applied? Please explain why**

**Answer**: **HD1 (Contingency)**

It makes sense in a plan that is expected to span such a considerable period of time for there to be some contingency provision against identified sites that cannot, for whatever reason, be developed within the specified time. In such circumstances, the activation of a contingency site should permanently remove the original intended site from the plan. In other words, each contingency activated should be a *replacement* within the plan for an original site that could not be developed as planned, *NOT an additional site for development*.

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* Each contingency activated should be a *replacement* within the plan for an original site that could not be developed as planned, *NOT an additional site for development*.

**Q9: Are there any specific measures that could be included within the Joint Local Plan that would assist with delivery?**

**Suggested Answer: YES**

There should be a clear commitment to a regular review of the actual demand for housing against the forecasts for housing need and the JLP should be adjusted accordingly in light of this evidence.

The stated objective of delivering “*the right type of homes, of the right tenure and in the right place meeting need*” must be a guiding principle for every decision made by the council before and during the life of the plan. These words must be translated into action at every stage of the preparation and implementation of the plan, and used as a test at each stage of development. All four elements of the objective: *type*, *tenure*, *place* and *need* must be satisfied if the council is to hold true to its stated objective.

Regarding *need*, the council must be totally committed to providing only housing that meets the genuine needs of the residents of Babergh, not the needs of the housebuilders and their desire for profit.

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* These words must be used as a test at each stage of development. All four elements of the objective: *type*, *tenure*, *place* and *need* must be satisfied if the council is to hold true to its stated objective.
* The council must be totally committed to providing only housing that meets the genuine needs of the residents of Babergh, not the needs of the housebuilders and their desire for profit.

**Q10: What factors or priorities should be set as triggers for reserve sites to come forward?**

**Suggested Answer: Replacement, not addition**

Reserve sites should be considered when something prevents an originally-identified site from being developed within the intended time scale. If there is a need to bring reserve site(s) forward, these should be instead of, not as well as, the originally-intended site(s).

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**Q11: Do you agree with the proposed criteria approach to rank settlements in the hierarchy? If not, please explain a suggested amendment or alternative.**

**Suggested Answer: NO**

In principle, the approach seems appropriate. However, it is unclear from the evidence whether account has been taken of the capacity of each Key and Supporting Service to deliver services in a community, or whether it is simply the presence of such services that has been scored when compiling the hierarchy. An example would be primary schools: the mere presence of a primary school in a community does not give any guarantees regarding availability of places at that school, as it may already be at capacity. This factor is especially important in the case of Sproughton which has few Key Services of its own. Here the assumption is that services located in Ipswich and elsewhere within 5 km are available to Sproughton residents, and a score of 2 and 1 is given for being within 5km of a Town and Core Village respectively.

Scoring for the hierarchy based purely on measured distance (i.e. 5 km) does not make sense. In many places, the time it would take to actually travel that distance would preclude the use of the services and facilities that might be there. A measurement based on *time to access* neighbouring facilities would be a more realistic measurement of how accessible such facilities were in practice.

Furthermore, accessing neighbouring facilities in the case of Sproughton would nearly always require the use of a car due to the lack of sustainable alternatives: safe cycle lanes, pedestrian footpaths and the frequency of public transport.

Note: Sproughton is classed as a “Core Village” in Table 2 (p6) of BMSDC Topic Paper: Settlement Hierarchy Review - August 2017, but as a “Hinterland Village” in the Appendix (Services and Facilities Matrix) to the same document.

There is no post office in Sproughton, yet it scores 1 for having a post office.

Overall the status of Sproughton is unclear and the actual facilities located within it and genuinely accessible in neighbouring settlements are overstated, casting doubt on the scoring in the hierarchy.

* In principle, the approach seems appropriate, BUT:
* It is unclear from the evidence whether account has been taken of the capacity of each Key and Supporting Service to deliver services in a community, or whether it is simply the presence of such services that has been scored when compiling the hierarchy.
* This factor is especially important in the case of Sproughton which has few Key Services of its own and the assumption is that services located in Ipswich and elsewhere within 5 km are available to Sproughton residents.
* Scoring for the hierarchy based purely on travelling distance (i.e. 5 km) does not make sense. In many places, the time it would take to actually travel that distance would preclude the use of the services and facilities that might be there.
* A measurement based on *time to access* neighbouring facilities would be a more realistic measurement of how accessible such facilities were in practice.
* Accessing neighbouring facilities in the case of Sproughton would nearly always require the use of a polluting car due to the lack of sustainable alternatives: safe cycle lanes, pedestrian footpaths and the frequency of public transport.
* Sproughton is classed as a “Core Village” in one place in the document, and as a “Hinterland Village” elsewhere
* There is no post office in Sproughton, yet it scores 1 for having a post office.
* The status of Sproughton is unclear and the actual facilities located within it and genuinely accessible in neighbouring settlements are overstated, casting doubt on the scoring in the hierarchy

**Q12: Do you agree with the proposed joint settlement hierarchy? If no, please provide further details as to how the hierarchy should be amended.**

**Answer: See answer to Q11 above.**

*See also email advice sheet. Note: the arbitrary scoring system adopted to score/classify communities actually turns the concept of Creeping Coalescence and its avoidance under the NPPF on its head as it scores the very factors that identify the risk of erosion of a communities identity as positive factors rather than negative factors. This in effect creates an excuse to circumvent NPPF policies to protect community identities to allow development.*

**Q13: Which option(s) for housing spatial distribution is best? Please explain your answer.**

**Suggested Answer: BHD4**

The production of a JLP covering over 25 years of planning and development presents the Council with an opportunity to be bold, innovative and creative in its thinking. The consultation document acknowledges that national planning policy “*encourages councils to consider whether growth could be accommodated through the planning of new settlements - either garden towns of villages.*”, and that “*opportunities are available to bring in enhanced government investment funds to help plan and support these areas*”.

Simply continuing the urban sprawl, and relying on shoring up already overstretched local services in the hope that they can cope with increased demands lacks imagination. The creation of a new purpose built settlement or settlements, carefully planned with adequate and modern services and infrastructure, allows that community to establish its own unique identity rather than adopting someone else’s, adding to diversity of the District’s communities. It also adds greater value and attractiveness to those seeking new homes in Babergh. The creation of new settlements may not, of itself, lead to improvement of services, infrastructure, environment, biodiversity, etc. elsewhere in Babergh, but it is less likely to damage it whilst at the same time preserving as much as possible of what is already here and valued for what it is.

 *See also email advice sheet. Note: 4 Special distributions rely heavily on Ipswich Fringe allocation and Hierarchy designation as in Q11-12. Consequently Sproughton attracts a heavy % of district growth in all 4 options, but extremely high in options BHD 1-3. The combination of the arbitrary scoring criteria of both Hierarchy and Spatial Distribution therefore appear to be vehicles to justify development in those fringe areas of Ipswich that might otherwise be protected by NPPF against Creeping Coalescence.*

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* The consultation document acknowledges that national planning policy “*encourages councils to consider whether growth could be accommodated through the planning of new settlements - either garden towns of villages.*”, and that “*opportunities are available to bring in enhanced government investment funds to help plan and support these areas*”.
* Simply continuing the urban sprawl, and relying on shoring up already overstretched local services in the hope that they can cope with increased demands lacks imagination.
* Creating a new purpose built settlement or settlements, carefully planned with adequate and modern services and infrastructure, allows that community to establish its own unique identity rather than adopting someone else’s, adding to diversity of the District’s communities.
* It also adds greater value and attractiveness to those seeking new homes in Babergh.
* Although creating new settlements may not, of itself, lead to improvement of services, infrastructure, environment, biodiversity, etc. elsewhere in Babergh, it is less likely to damage it, whilst at the same time preserving as much as possible of what is already here and valued for what it is.

**Q14: Are there realistic other broad distribution options which should be considered? Please explain your answer.**

**Suggested Answer: YES**

**Carefully-planned organic growth of existing communities across the District.**

This approach would provide the necessary additional housing without impacting so heavily or disproportionately on existing communities, preserving rather than destroying their unique identities. It could act as a catalyst to improve and update existing services, infrastructure and facilities for all Babergh’s residents, on a scale that would be both acceptable and sustainable. It could accommodate new employment opportunities through small local enterprises, reducing the need for people to travel long distances to work, encouraging cycling and walking and reducing emissions. Such an approach, carefully managed, would enhance all those things which make Babergh a desirable place to live and work

Having more but smaller development projects would also impact positively on local employment, providing opportunities for local developers and associated construction tradespeople to bid for contracts to build.

* This approach would provide the necessary additional housing without impacting so heavily or disproportionately on existing communities, preserving rather than destroying their unique identities.
* It could act as a catalyst to improve and update existing services, infrastructure and facilities for all Babergh’s residents, on a scale that would be both acceptable and sustainable.
* It could accommodate new employment opportunities through small local enterprises, reducing the need for people to travel long distances to work, encouraging cycling and walking and reducing emissions.
* It would enhance all those things which make Babergh a desirable place to live and work
* Having more but smaller development projects would also impact positively on local employment, providing opportunities for local developers and associated construction tradespeople to bid for contracts to build.

**Q15: If a new settlement was to be planned in the area, where should it be located? Please explain your answer.**

* South of the A14, close to the A12 and rail links to London (e.g. Great Blakenham)
* For Mid Suffolk: North of Hadleigh towards Wattisham
* As close as practicable to a major trunk road and rail services
* Preferably on a “brown field” site

**See Also General Comments on email advice sheet.**