

(2) MID SUFFOLK DISTRICT COUNCIL

Our ref: Woolpit NP Reg 16 Consultation

Date: Thursday 6th February 2020

Dear Janet,

- 1. Consultation under Regulation 16 of the N'hood Planning (General) Regulations 2012 (as amended): The Woolpit Neighbourhood Development Plan 2016 - 2036**
- 2. Response from Mid Suffolk District Council**

Following formal submission of the Woolpit Neighbourhood Plan (the Woolpit NP) we have revisited our comments we made on the Regulation 14 document and have taken time to look at this latest draft Plan in detail. Many of suggestions put forward have been implemented but, regrettably, we find it necessary to place on record the following which focuses primarily on the matter of housing numbers. We also include links to quoted sources at the end of this letter.

Section 4 Housing Policies and Calculation of Housing Need (page 65)

In our Reg 14 response we advised that the housing numbers set out in our August 2017 Joint Local Plan were out of date and had been superseded by the introduction of a new standard methodology for calculating district-wide housing need following the revision to the National Planning Policy Framework in July 2018. Whilst not being able to give the Neighbourhood Planning Group certainty on the likely requirement for Woolpit at the time [April 2019] we did advise that a figure higher than that being provided in the Neighbourhood Plan could not be ruled out.

The preparation of the Joint Local Plan is based upon the identification of a spatial strategy, which considers consultation responses to the 2017 document, the availability and deliverability of sites, the preferred spatial distribution pattern, the sensitivities and constraints of the area, and the infrastructure capacity and opportunities, all of which is set out in paragraph 9.8 on page 38 of the Joint Local Plan Preferred Options document (July 2019).

In the submitted Consultation Statement, mention is made that the total housing requirement for the Woolpit NP has been amended from 252 dwellings to 255 dwellings as set out in the appendix on page 65 of the submitted Plan. However, this applies to an assumption that Core Villages meet 25% of the District housing requirement, with 20% distributed *pro-rata* among all the Core Villages, and the extra 5% *pro-rata* among only those Core Villages within 2-kilometres of an A-road. It continues to follow the out of date housing numbers of 2017, as noted above. The appendix also notes that a preferred spatial distribution policy had not been published, despite this being published the week in advance of the Mid Suffolk Council meeting that took place on 27th June 2019 and, subsequently, in the Joint Local Plan Preferred Options consultation document published on 22nd July 2019, i.e. before the Woolpit NP Consultation Statement was published.



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In early July 2019 there was therefore an opportunity for the Woolpit NP Group to revisit the housing requirement, to amend their draft plan accordingly, and to decide whether it would be appropriate or not for them to re-consult on their plan at the Regulation 14 stage.

The Preferred Options Joint Local Plan policy SP04 (page 39) identifies a spatial distribution, which is not focused towards the Ipswich Fringe as stated in the Woolpit NP appendices. This emerging policy clearly identifies a total of 43% of the total new homes planned for, being delivered in core villages in Mid Suffolk District, of which Woolpit is one. Therefore, when assessing the location of Woolpit in accordance with emerging Joint Local Plan as set in paragraph 9.8, a minimum requirement of 727 homes is identified as at 1st April 2018, and which also contained any outstanding planning permissions granted but not yet completed as at 1st April 2018.

The A14 corridor is part of the Strategic Road Network and therefore cannot be compared to other 'A' roads in Mid Suffolk. Furthermore, the A14 corridor runs in parallel with the Ipswich to Norwich and Ipswich to Cambridge railway line and is defined as a strategic transport corridor in the Preferred Options Joint Local Plan.

Therefore, the emerging Joint Local Plan proposes to allocate sites LA093 – Land East of Green Road (49 dwellings) and LA094 – Land South of Old Stowmarket Road (120 dwellings), [WPT4 and WPT3 in the Neighbourhood Plan], both of which have planning permission granted. In respect of site WPT4 / LA093, this is currently under construction. A reserved matters application is currently being considered for 115 dwellings on site WPT3 / LA094.

The Preferred Options Joint Local Plan also allocates sites LA095 – Land North East of The Street (500 dwellings), LA096 – Land North East of Heath Road (10 dwellings) and LA097 – Land West of Heath Road (30 dwellings). These sites are not allocated in the Woolpit NP although we acknowledge a site also on Land South of Old Stowmarket Road is allocated for 40 dwellings in the Neighbourhood Plan (reference WPT5), on which an outline planning application is currently being considered for 40 dwellings.

The difference between the housing requirement identified in the Joint Local Plan and that contained in the Neighbourhood Plan is effectively the quantum identified on site allocation LA095. Within this site allocation is land for a pre-school and primary school, which is required to support the plan-led growth identified in both Woolpit and Elmswell. As established in the Babergh & Mid Suffolk Infrastructure Delivery Plan (IDP) (July 2019) the new primary school is identified as a 210-place school initially and able to expand to 420 places. The site allocation LA095 also aims to deliver other key infrastructure required to enable the sustainable growth of the area, such as the new cycle/pedestrian link between Elmswell and Woolpit, as well as mitigation measures and developer contributions towards highways, public transport and health provision.

In considering the housing requirement identified in the Preferred Options Joint Local Plan and the sites identified for allocation, it is necessary to consider the evidence informing the local plan process. For this reason, there is concern in relation to the extent to which this Neighbourhood Plan meets the basic conditions in its current form. You will also be well aware that PPG is clear¹ that '*the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested*'. What is not clear is how this Neighbourhood Plan has taken into account the emerging local plan for the District and the identified requirements and spatial strategy set out therein.

¹ PPG on Neighbourhood Planning paragraph 009 Reference ID: 41-009-20190509.

We trust that our comments above are helpful in setting out this Council's latest position with regards to housing numbers and we would be happy to answer any further questions you may have.

Yours sincerely

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Babergh & Mid Suffolk District Councils – Working Together

Useful links:

1. Report to Mid Suffolk Council dated 27 June 2019 on emerging Joint Local Plan:

<https://baberghmidsuffolk.moderngov.co.uk/documents/s15293/MC197.pdf>

2. Babergh & Mid Suffolk Infrastructure Delivery Plan (IDP) (July 2019):

<https://www.midsuffolk.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/BMSDC-IDP-July-2019-.pdf>