

SUMMARY
FRESSINGFIELD HOUSING WORKING GROUP RESPONSE TO MSDC DRAFT JOINT LOCAL PLAN

1. CONTEXT - The DJLP should draw on a three-tier framework for planning policy and decision:

- **National Tier** - principles in the National Planning and Policy Framework (NPPF)
- **District/County Tier** - County strategies such as the Suffolk Growth Strategy and District policies that do not relate to housing, such as MSDC's Joint Landscape Guidance
- **Local Tier** - neighbourhood development plans (NDPs) capturing intelligence from local people so they can '*shape their surroundings*'. NDPs must be included in Local Plans.

The DJLP does not comply in some respects with the NPPF. For example, it does not specify density of new housing, which can have a major effect on the impact of new housing in rural areas. Although the District's Joint Landscape Guidance is mentioned in the document, the important landscape characteristics it identifies are not captured in the settlement criteria. This means that some landscapes of important character may be vulnerable to '*irreparable damage*'.

Mendlesham is the only Mid Suffolk parish to have an NDP, so the local tier of information is largely missing. Realistically, by the time the other 119 parishes have produced NDPs, even more opportunistic development will have taken place. As the NPPF requires planning to be shaped by local people, other measures are needed to achieve this ahead of NDPs.

Orders developed locally by local people can be brought into force after external approval:

- Neighbourhood Development Orders (NDOs), for housing by local people for a local area
- Community Right to Build Orders (CRtBOs) for affordable housing retained for local people.

Both must be agreed by referendum and approved by an independent examiner.

Local Housing Needs Surveys should also be undertaken by MSDC in every parish, to capture local intelligence such as number of people who have had to leave the village because of lack of affordable housing, or of older people wanting to downsize but unable to find suitable houses to buy. These would inform planning ahead of NDPs, to which they would also contribute.

Co-operation is needed with neighbouring authorities where residents on one district work or use services in another. This may mean that housing need in one area could be met in another and vice versa. Without cooperation, MSDC cannot know if any housing need in this district will be met in south Norfolk.

2. VISION - The vision in MDC's draft Local Plan does not even mention the word 'rural', although 75% of MSDC residents live in rural areas. It should convey the economic, social and environmental aspirations that together make up successful sustainable rural life and refer to the Key Issues that the DJLP identifies, setting objectives to address them.

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3. HOUSING AND HOUSING REQUIREMENT CONTEXT The government has recently proposed a single mandatory formula for housing need, the effect of which is shown below for Fressingfield.

COMPARISON OF NEW HOUSES NEEDED PER YEAR		
BASED ON GOVERNMENT AND MID SUFFOLK FORMULAS		
	MSDC 'FAIR SHARE'	GOVERNMENT
Mid Suffolk p.a	452	573
Fressingfield Worst case (Core Village Option MHD3*) p.a.	5	6
Fressingfield (Core Village Best Case Option MHD4**) p.a	3	6

* 30% spread evenly across 25 Core villages Villages

**15% spread evenly across 25 Core Villages

Fressingfield is currently subject to approved applications for 52 houses and 3 pending applications for 208, making a total of 260 in a village with just over 400 houses. This amounts to 52 years' worth of housing under MSDC's worst-case option applied on a fair shares basis, which is supposed to cover 22 years. It gives 43 years' worth of housing under the government formula, which is intended to cover 10 years. By no stretch of the imagination would this sustain the rural historic character of the village and would be a disproportionate contribution to meeting housing need in Mid Suffolk.

4. SETTLEMENT HIERARCHY - the criteria used to determine the different types of settlement are badly flawed and inaccurate. The audit was based on online searches not survey data which would have been more accurate.

The government's own, more accurate classification of rurality should have been used as a starting point so that the character of villages is taken into account as well as the services they have. Despite a long list of Key Issues in the DJLP, some of these (such as historic character) are missing from the criteria as a factor in deciding upon new development. The criteria do not distinguish between whether services exist and whether they have capacity for expansion. The capacity of a settlement to absorb more traffic is also not covered.

The audit also contained inaccuracies. Because of the errors Fressingfield has been scored as a 'core village', exposing it to up to 30% of new development when correct scoring would have made it a 'hinterland village' expected to absorb no more than 15%.

5. SPATIAL DISTRIBUTION - This approach was developed from a market exercise in identifying possible sites, with no reality check from local people because of the lack of NDPs. Yet density to critical to spatial distribution is not even mentioned. This makes it hard to judge the options. If it remains a 'core village', the best-case scenario for Fressingfield is the New Settlement Option (15%) and the worst is the Transport Corridor Focused option (30%). The options are derived from criteria that are crude and inaccurate, so this spatial distribution is inadequate. It does not comply with the sustainability criterion of the NPPF as it does not take into account local character or heritage, nor the capacity of services or roads to absorb more housing and traffic. It also fails to recognise the '*intrinsic character and beauty of the countryside*' (NPPF principle 5), that makes Suffolk what it is, and attracts tourism, which is expected to grow.

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Cumulative development is also not taken into account except in hamlets, even though distribution of development has been poorly controlled and inconsistent in the past, as the DJLP acknowledges. This important factor would determine how far the historic or landscape character had already been eroded and help judge the capacity of a settlement to absorb more housing. It should be applied across the settlement hierarchy.

In contrast, Suffolk Coastal District Council proposes most new development in towns and major centres, with just 17% in its equivalent of core villages and '*minimal*' development in hinterland villages. In such villages '*small scale*' developments would be permitted only '*with local support*' whether through a CRtBO or otherwise. Suffolk Coastal's approach is preferable.

Interestingly, the government's proposed new approach would allocate housing to a settlement based on the percentage that its population bears to the population of the district - mapping new development to existing housing patterns in effect.

6. HOUSING TYPES AND AFFORDABLE HOUSING - A 'cradle to grave' approach is needed to planning housing types and tenure in a neighbourhood, so that people can move within the same area as their needs change. Young people need affordable housing that is protected for village residents. For older people wanting to downsize there must be suitably sized market and affordable housing to move to, so that family size houses are freed up for families who are then able to stay in the village and support older relatives. Sheltered housing should be located in villages to keep the generations together. Such an approach would improve community cohesion and sustainability. A Local Housing Need survey could capture this sort of need, providing a neighbourhood profile to inform judgements about housing type. MSDC should also adopt Optional Building Regulations that require houses to be designed to be adapted to changing needs of residents over time, so they do not have to move.

7. RURAL GROWTH AND DEVELOPMENT - There are elements missing from the rural growth and development strategy, including rural, landscape and historic character, density, cumulative development, CO2 reduction and current and future standards of amenity. Although some are mentioned, they are not an integral to a sustainable rural growth strategy. Suffolk Coastal's spatial distribution strategy is far more suited to Mid Suffolk than that proposed.

Above all, local evidence from local people - the vision of the Localism Act - is missing because of the lack of NDPs. A radical and proactive approach is needed to correct this.