

# Babergh & Mid Suffolk Joint Local Plan: **Consultation Document**

August 2017





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# Strategic

# Introduction

## Introduction

The Babergh and Mid Suffolk Joint Local Plan – consultation document (hereafter referred to as ‘the Consultation Document’) is an important document which will provide the strategy for the growth of the Districts, setting out what and where development will take place up to 2036. Once adopted, the new Joint Local Plan will replace the existing local planning policies for both Babergh and Mid Suffolk. The Plan will set out a vision for the area and will include policies and land allocations.

## What is the purpose of this consultation?

The purpose of this consultation is to identify the issues, put forward options and, in some instances, to indicate an initial preference for the new Joint Local Plan for Babergh and Mid Suffolk.

This consultation is your opportunity to identify any planning issues that you think the new Joint Local Plan should address, and comment on possible ways that the plan might address these important issues in your communities (including informing where you consider development should be located). The more information you can inform us of at this initial stage, the greater your opportunity to shape the future of the area. Please send us your thoughts and comments on the new Joint Local Plan – this affects everyone and once adopted will influence the area for years to come.

## Why do we need a Plan for Babergh and Mid Suffolk?

The role of the planning system is to contribute towards the achievement of sustainable development. Planning involves weighing up economic, social and environmental factors to achieve the most balanced and sustainable way forward for the benefit of the public interest.

1 See Glossary

2 See Glossary

3 See Glossary

4 See Glossary

Following a number of significant changes in the local, county and national context since the current Local Plans (see Development Plans section below) were developed it is considered appropriate to revisit and realign our priorities, objectives and vision for the future of Babergh and Mid Suffolk. This will ensure the spatial planning framework for the Districts is up to date and will provide a sustainable basis upon which to shape communities and manage development up to 2036 and beyond.

The policies set out in an up-to-date Local Plan will provide the primary consideration in weighing up considerations when determining applications.

Local Plans must be produced in accordance with national planning policy. Government policy, set out in the National Planning Policy Framework (NPPF)<sup>1</sup>, sets out a requirement for local planning authorities to objectively assess the need for housing in their Housing Market Area and ‘to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing...including identifying key sites which are critical to the delivery of the housing strategy over the plan period’ (paragraph 47). The Council has worked with authorities in the Housing Market Area<sup>2</sup> (Babergh, Mid Suffolk, Ipswich and Suffolk Coastal) on the production of a Strategic Housing Market Assessment<sup>3</sup>. The assessment covers the period up to 2036, which aligns with the period all of the respective plans will be covering.

## Babergh and Mid Suffolk’s Current Development Plan

The current Development Plan<sup>4</sup> for Babergh consists of the saved policies of the Babergh Local Plan, Alteration No. 2 (2006), The Babergh Local Plan (2011 – 2031) Core Strategy and Policies (2014) and the ‘made’ neighbourhood plans – East Bergholt Neighbourhood Plan (2016) and Lavenham Neighbourhood Plan (2016). For

Mid Suffolk, the Development Plan comprises the saved policies of the Mid Suffolk District Local Plan (1998), the First Alteration to the Mid Suffolk Local Plan (2006), the Mid Suffolk District Core Strategy Development Plan Document (2008), and the Mid Suffolk District Core Strategy Focused Review (2012), the Stowmarket Area Action Plan Mid Suffolk's New Style Local Plan (2013) and the 'made' Neighbourhood Plans which currently only comprises the Mendlesham Neighbourhood Plan (2016).

The Minerals Core Strategy (incorporating Development control Policies) (2008) and the Waste Core Strategy Development Plan Document (2011) produced by Suffolk County Council also form part of the Development Plan.

The new Joint Local Plan will replace the Local Plans and alterations (saved policies), the Core Strategies, and the Stowmarket Area Action Plan.

When made, any new Neighbourhood Plans<sup>5</sup> shall also become part of the development plan and shall be considered alongside the Joint Local Plan when determining applications. As at July 2017, neighbourhood plans have been made in Babergh for the parishes of East Bergholt, Lavenham and in Mid Suffolk for Mendlesham. A further 14 parishes have been subject of area designation and plans for these areas are at various stages of preparation. There is a timely opportunity for neighbourhood planning groups to be developed in parallel with the local plan and share evidence and information to bring forward sites for allocation to emerging the levels of growth as stipulated in the draft Joint Local Plan.

## The new Joint Local Plan

The new Joint Local Plan will set out the amount of growth that needs to be planned for, where the growth should go and how it should be delivered. Planning policies will set the context for protecting the District's valuable natural and built environment and ensure that new development

is delivered in a sustainable way. These planning policies will be used by the Council when making decisions on planning applications.

The Plan will be primarily based upon and in conformity with current and emerging national planning policy and legislation, whilst having full regard to strategic matters identified in relation to the emerging countywide Suffolk Strategic Planning and Infrastructure Framework<sup>6</sup>, the New Anglia Local Enterprise Partnership<sup>7</sup> and the Housing Market Area.

## Why do we need a Plan to deliver growth?

The Council has identified its Objectively Assessed Need (OAN) for housing<sup>8</sup>. The new Joint Local Plan will set out a strategy that will accommodate this in full in accordance with national policy requirements. Preventing growth across the two Districts is not an option. Levels of housing need in the area are high and new homes will have to be provided to meet this need. Rates of annual housing delivery in Babergh and Mid Suffolk have been below the levels of current need since need 2014/15 and this has further compounded the levels of unmet housing need impacting upon the requirement for future development.

Delivery of housing and economic growth is challenging. A 'plan led' approach to shaping the levels, locations and scope of future delivery provides a mechanism to pro-actively manage and influence the future of the area.

Housing and economic growth is a key factor in securing investment into existing and new infrastructure projects. Development should be planned to secure the delivery of key infrastructure projects across the County, such as the Ipswich Northern Route and the Sudbury Western Relief Road, as well as localised infrastructure schemes within communities.

<sup>5</sup> See Glossary

<sup>6</sup> See Glossary

<sup>7</sup> See Glossary

<sup>8</sup> See Glossary

The proposed locations and details of development will be subject to consultation through the plan preparation process.

## The Plan

The Plan will be set out in 3 parts:

1. **Strategic**
2. **Delivery**
3. **Places.**

The Plan will articulate policies to influence delivery across four priority areas that your district councillors have identified will have the most positive impact on that future:

- **Housing**
- **Economy**
- **Environment**
- **Healthy Communities & Infrastructure**

The Councils of Babergh and Mid Suffolk, as the Local Planning Authorities, need to work with a large number of organisations and individuals to produce a local plan and determine planning applications. Alongside working with infrastructure providers and the New Anglia Local Enterprise Partnership, Babergh and Mid Suffolk District Councils work closely with the other local authorities across Suffolk, including with the County Council.

Viability is a factor which has a significant influence over planning policies and development proposals. The new Joint Local Plan has to be deliverable. The NPPF (paragraph 173) states that in order to ensure the deliverability of the Plan and the viability of development, it is necessary to ensure that, with all costs taken into account, development will provide a competitive return to a willing landowner and developer. This means that the cost of meeting the requirements of the policies in the new Joint Local plan combined with the costs of meeting national requirements, such as building regulations, need to be assessed and factored into the emergence of policy.

## Delivery & Places

The Plan will have a focus upon managing the delivery of sustainable development which supports the areas economic growth ambitions; the important rich historical and natural environment; the extensive network of existing communities; and enables development through facilitating the delivery of infrastructure.

The new Joint Local Plan will take into account emerging Neighbourhood Plans being prepared in the Districts and will provide a basis for new Neighbourhood Plans to be prepared against. The new Joint Local Plan will need to clearly identify the 'Strategic Policies' that new Neighbourhood Plans will need to be in accordance with.

## Local Plan Timetable

The new Joint Local Plan will take approximately 2 years to prepare. There will be extensive public consultation leading up to the final draft plan which will be submitted to the Government for independent examination.

The Councils consulted on three topic based initial options documents in January 2015 addressing (i) Rural Growth, (ii) Development Management Policies and (iii) Strategic Site Allocations.

However, since consulting on the documents the strategic context which informs the emerging Plan has changed significantly. A collaborative approach has been taken with the adjoining Suffolk authorities. All are producing Plans to cover the period to 2036. A revised Strategic Housing Market Assessment and Employment Land Needs Assessment<sup>9</sup> (including Employment Land Supply Assessment<sup>10</sup> and Sector Needs Analysis<sup>11</sup>) has been undertaken across the Housing Market Area as well as other relevant local studies. Consequently the District has decided to undertake a comprehensive review for the new Joint Local Plan.

<sup>9</sup> See Glossary

<sup>10</sup> See Glossary

<sup>11</sup> See Glossary

The Council updated the Local Development Scheme<sup>12</sup> in March 2017. Milestone dates are as follows:

- **Publication of Regulation 18 Draft Local Plan**  
*Summer 2017*
- **Publication of Regulation 19 Draft Local Plan**  
*Winter 2017/18*
- **Submission of Regulation 22 Draft Local Plan**  
*Summer 2018*
- **Examination in Public**  
*Winter 2018*
- **Adoption of Plan**  
*Spring 2019*

<sup>12</sup> See Glossary



# Babergh & Mid Suffolk Profile & Context

## Context

Babergh and Mid Suffolk are predominantly rural districts covering the geographical centre of Suffolk, running from the boundary with Essex in the south to the boundary with Norfolk in the north. This covers a total area of approximately 565 square miles.

Babergh and Mid Suffolk Councils have been developing an agreed process of integrating services over several years. Whilst remaining two distinct sovereign councils, they now have a single staff structure to serve the two organizations and members work together collectively to deliver local authority services across the two districts. Both Councils' overall visions and strategic priorities proved to be very similar and have been recently further aligned<sup>13</sup>. Over the next three years the new Joint Strategic Plan<sup>14</sup> identifies a shared focus on the planning and delivery of sustainable growth. The Local Plan is one of the key tools available to the Council to help deliver the shared vision locally.

## Profile

The population of Babergh District is 87,740; Mid Suffolk population is 96,731 (Census, 2011).

Across Babergh and Mid Suffolk more than half the population live in villages and rural areas. In combination both districts have six main centres; which include Eye, Needham Market and Stowmarket in Mid Suffolk; Pinewood, Hadleigh and Sudbury in Babergh. The historic market towns are surrounded by a rural hinterland comprising 198 rural parishes.

Babergh and Mid Suffolk are heavily influenced by large centres of population just across its borders; Bury St Edmunds in the west, Ipswich in the east, Diss and Harleston in the north. This is reinforced by the area's strategic

transport connectivity with main road and rail links including the A12/A14/A140 main roads from London to Felixstowe and Cambridge, together with main line rail links from London, to Cambridge and Norwich and a strategic link for freight traffic from Felixstowe to Nuneaton in the Midlands. A large portion of Mid Suffolk has direct access to the A14 and the main line railway between London/Ipswich/Norwich and Cambridge. Babergh has lesser access with a small proportion of its area served directly by the east A12 and north by the A14 and no main line railway stations.

## Key Social Issues

### • A Growing Population

The population is expected to continue to grow over the period 2014 to 2036. The official 2014 Sub-National Population Projections identify an increase of around 8,000 people in Babergh and around 13,000 people in Mid Suffolk.

### • An aging demographic

The Districts have similar demography with fewer younger people and an increasing proportionate aging population. Both Districts have an aging population with 45 - 59 year olds representing the single largest age group at present. In addition, a significant percentage of the population are aged 65 years or older (21% in Babergh and 20.13% in Mid Suffolk<sup>15</sup>). Babergh and Mid Suffolk also have a relatively long life expectancy at about 81 years for males and about 84 years for females<sup>16</sup>. As the population ages, there will be different demands on services and facilities, in particular housing and medical care.

### • Open Space

Whilst there is extensive countryside previous assessments for Babergh and Mid Suffolk have identified an identified deficiency in accessible open space provision, this includes - Neighbourhood Equipped Areas for Play (NEAP) and Local Equipped Areas for Play (LEAP), outdoor sports provision and allotments.

<sup>13</sup> See <http://www.babergh.gov.uk/assets/Uploads-BDC/Strategic-Plan-2014.pdf> for the current Joint Strategic Plan

<sup>14</sup> See Glossary

<sup>15</sup> Census 2011, KS102EW, Age Structure

<sup>16</sup> Suffolk Observatory 2013

### • Education

Educational attainment at GCSE level is in line with Suffolk and national averages. However many pupils access 6th Form education outside of the Districts including at Ipswich or Bury St Edmunds.

### • Housing Need and Affordability

House prices on average are around 9 times above the average earnings of residents and rural parts of the Districts are unaffordable for many.

### • Income Deprivation

In Babergh 69% of the population and in Mid Suffolk 75% of the population live in a rural location. Although deprivation levels are low compared with national levels, across Suffolk 28% of those identified as income deprived live in rural areas.<sup>17</sup>

### • Low Crime Levels

Babergh and Mid Suffolk benefit from low levels of crime and levels of unemployment have been decreasing recently.

## Key Economic Issues

### • Economic base

The economic sectors that achieve growth in Babergh and Mid Suffolk are tourism; creative industries; food production, construction and related services; hospitality/ leisure. Babergh is near the level of the county with regard to the level of business formation rates, however Mid Suffolk currently holds the lowest rates in Suffolk.<sup>18</sup>

### • Employment levels

The employment rate relating to the population between 16 and 64 years (working age) fluctuates but is generally around the England average for Babergh and higher than the England average for Mid Suffolk. In 2015, the employment rates in the Districts were 73.7% and 79.7% respectively, compared to an England average of 73.9%.<sup>19</sup>

### • Projected growth

Research in 2016 suggests that Babergh is due to see a 14% increase in jobs and Mid Suffolk to see a 13% increase from 2011 – 2031, which represents a slow down when compared with past trends. The overall growth in jobs is expected to be driven by growth in the Professional and Business Services.<sup>20</sup>

### • Need for land

The largest employment land needs requirement in both Babergh and Mid Suffolk will be general office (B1a), Science Park and Small Business Units (B1b), and Distribution (B8).<sup>21</sup>

### • Town centre occupation

The vacancy rates in town centres in Babergh & Mid Suffolk are below the national average. However, it is acknowledged that there is a need to enhance the town centres.

17 Hidden Needs Report - Hidden Needs in Suffolk Five Years On (Report to Suffolk Community Foundation, 2016)

18 Suffolk Observatory 2013

19 Suffolk Observatory 2015

20 Ipswich and Waveney Economic Areas Employment Land Needs Assessment (2016)

21 Ipswich and Waveney Economic Areas Employment Land Needs Assessment (2016)

## Key Environmental Issues

### • Environmental assets

The Districts have a rich historic environment, with a number of protected areas such as Sites of Special Scientific Interest (SSSI) sites, Special Protection Areas (SPAs) and Area of Outstanding Natural Beauty (AoNBs). Water is a key environmental issue to be addressed in terms of provision/quality and flooding. Air is also a key issue that needs to be considered. With such a rich but sensitive natural and built environment the pressure of new development will need to be carefully managed.

### • Air Quality

One area in Sudbury is identified as an Air Quality Management Area.

### • Biodiversity

Significant areas of priority habitat / species have been recorded. Some priority habitat / species identified is in adverse condition.

### • Geology

There are areas within both districts that are identified as having geological importance (Regionally Important Geological and Geomorphological Sites and County Geodiversity Sites<sup>22</sup>).

### • Climate Change

Along river courses there are areas at risk of flooding. Areas with risk of coastal erosion have been identified in the south of the Babergh District.

### • Heritage Assets

Babergh and Mid Suffolk are rich in heritage assets<sup>23</sup>. In Babergh there are 29 designated conservation areas (36% of all 79 villages and towns) and 2985 listed buildings, 34 scheduled monuments and 5 registered parks and gardens which represent about 20% of the estimated 13,700 designated Heritage Assets in Suffolk. In Mid Suffolk there are 3419 listed buildings, 36 scheduled monuments and 2 registered parks and gardens; which represents more than a quarter of all Heritage Assets in Suffolk (Historic England May 2016, Heritage Counts, April 2014).

### • Landscape

There is a significant extent of quality landscape including European and nationally designated areas within both districts. Babergh in particular is part of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty<sup>24</sup> and Dedham Vale and Stour Valley Area of Outstanding Natural Beauty.

### • Material Assets

Both districts have a high volume of Grade 3 Agricultural Land<sup>25</sup> and limited available previously developed land. Recycling performance is currently lower than the County average in both districts.

### • Water Quality

The Districts need to improve water quality in a number of identified areas and provision of water infrastructure is essential to ensure infrastructure capacity is available for any new development.

22 See Glossary  
23 See Glossary  
24 See Glossary  
25 See Glossary

# Vision and objectives

## Vision

The new Joint Local Plan needs to set a spatial vision of the type of place that Babergh and Mid Suffolk will become by 2036. The vision will be based upon the following key priority areas for Babergh and Mid Suffolk Council namely:

- **Housing**
- **The Economy**
- **The Environment**
- **Healthy Communities & Infrastructure.**

The achievement of these objectives should to be set within the context of the National Planning Policy Framework (NPPF) and the presumption in favour of sustainable development. To contribute to the delivery of the vision and priority areas the New Joint Local Plan will set out an ambitious yet sustainable growth agenda which will prioritise the infrastructure investment required to deliver the growth ambitions and will identify the locations for delivering the necessary housing, employment and recreational growth and development. In accordance with paragraph 156 of the NPPF, the Plan will signpost throughout how it meets the strategic objectives requirements.

## Objectives:

The proposed objectives for the Plan are as follows:

### Housing:

- Delivery of the right type of homes, of the right tenure in the right place meeting need.
- To seek to maintain a sustainable balance between housing and employment opportunities.

### Economy:

- Encourage development of employment sites and other business growth, of the right type, in the right place and encourage investment

in skills and innovation in order to increase productivity.

- To encourage inward investment to the Districts by supporting infrastructure improvements that will enable the continued growth of Felixstowe and strengthen the Districts' links to Felixstowe and the rest of the UK.
- To support the 'Ipswich Northern Route' project and the strengthening of Ipswich and the surrounding area as the key economic driver of the County.

## Environment:

- To protect and enhance environmental assets (including landscapes, biodiversity, green spaces, air and water quality, and river corridors) for current and future generations.
- Ensure new development avoids areas of flood risk and reduce future flood risk where possible.

## Healthy communities & Infrastructure

- To enable provision of the necessary infrastructure to support residents, businesses, communities, the environment and individuals.
- To prioritise investment in strategic services and infrastructure, improving connectivity and service provision.
- To support communities to deliver plans and projects at the district and neighbourhood levels, specifically providing opportunities to for the District Councils supporting communities on the development on neighbourhood plans.
- To work with the communities of Sudbury and Stowmarket in the development of a vision and strategy for both towns.
- To support the development of proposals for a Sudbury Western Relief Road project.

### **Consultation Questions:**

- Q 1. What do you think the vision should be?**
- Q 2. Do you agree with the identified objectives?  
Please explain reasoning.**
- Q 3. Are there other objectives which should be added?**
- Q 4. What should be a priority across the district area? (please state which district)**
- Q 5. What is most important for your town or village?**

# Duty to Cooperate

## What is the Duty to Cooperate

The Duty to Cooperate is applied to local planning authorities by **Section 110 of the Localism Act 2011** and requires the Councils to apply the Duty to Cooperate in relation to planning of sustainable development. It is a prerequisite test for the Examination of Local Plan production.

**Paragraph 156 of the National Planning Policy Framework** sets out that Local planning authorities should set out the strategic priorities for the area in the Local Plan which should include strategic policies for:

- 1) the homes and jobs needed in the area
- 2) the provision of retail, leisure and other commercial development
- 3) the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)
- 4) the provision of health, security, community and cultural infrastructure and other local facilities
- 5) climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape

Further information regarding the Duty-to-Cooperate can be found on the Government national planning guidance website at - <https://www.gov.uk/guidance/duty-to-cooperate>

## What are we cooperating on

The full list of bodies in the Duty-to-Cooperate is set out in **Part 2 of The Town and Country Planning (Local Planning) (England) Regulations 2012**.

The Councils in the Ipswich Housing Market Area (HMA), namely; Babergh DC, Ipswich BC, Mid Suffolk DC, Suffolk CC and Suffolk Coastal DC already have a long history of cooperation

on strategic planning matters. However, due to the geographical context of Babergh and Mid Suffolk districts the potential matters for strategic cooperation are complex extending mainly across Suffolk, Norfolk and Essex.

A summary of the current key issues and identified partners which the Council is cooperating with is identified below. As the Local Plan (and other neighbouring Local Plans) develops, there may be additional key issues which also need to be considered.

<b>Key planning issue</b>	<b>Key DtC partners</b>
<b>Housing</b>	
1) Defining housing market area and objectively assessed need	Ipswich HMA authorities, Waveney DC, St Edmundsbury BC, Braintree DC, Tendring DC, Colchester BC, South Norfolk DC, Breckland DC, New Anglia LEP, Greater London Authority
2) Resolving if unmet housing need is identified and the approach to delivery of the housing requirement	Ipswich HMA authorities, Waveney DC, St Edmundsbury BC, Braintree DC, Tendring DC, Colchester BC, South Norfolk DC, Breckland DC, New Anglia LEP, Homes & Communities Agency
3) Impact of bordering strategic housing developments	Ipswich HMA authorities, Waveney DC, St Edmundsbury BC, Braintree DC, Tendring DC, Colchester BC, South Norfolk DC, Breckland DC
<b>Employment</b>	
4) Defining functional economic market area and objectively assessed need	Ipswich HMA authorities, St Edmundsbury BC, Braintree DC, Tendring DC, Colchester BC, South Norfolk DC, Breckland DC, New Anglia LEP
5) Enterprise Zones and Local Development Orders	Ipswich HMA authorities, Suffolk CC, New Anglia LEP
6) Impact of bordering strategic employment land developments	Ipswich HMA authorities, St Edmundsbury BC, Braintree DC, Tendring DC, South Norfolk DC, New Anglia LEP
<b>Retail, leisure &amp; other commercial</b>	
7) Enhancement and regeneration of retail centres	Ipswich HMA authorities, New Anglia LEP
<b>Infrastructure provision</b>	
8) Provision and enhancement of strategic infrastructure improvements	Ipswich HMA authorities, Suffolk CC, Essex CC, Norfolk CC, Highways England, West Suffolk CCG, East Suffolk CCGP
<b>Environmental protection</b>	
9) Conservation and enhancement of the natural and historic environment	Ipswich HMA authorities, Suffolk CC, Natural England, Environment Agency, Historic England

## How are we going to cooperate

The Council is already cooperating on many of the key relevant issues such as jointly commissioning strategic evidence and sharing consistent assessment methodologies with the other planning authorities in the Ipswich Housing Market Area.

Detailed discussions will be held with other Duty to Co-operate bodies when the relevant sections of the Joint Local Plan are being drafted.

### Consultation Questions:

- Q 5A. Do you agree or disagree with the identified key issues for compliance with the Duty-to-Cooperate for the Babergh and Mid Suffolk Joint Local Plan? Please explain why.**
- Q 6. Are there any other key planning issues which need to be considered in accordance with the Duty-to-Cooperate? Please explain why.**



# Delivery

# Housing

## Housing Requirement

### Strategic Priorities

Paragraph 156 of the NPPF requires the Local Plan to set out strategic priorities to deliver the homes needed in the area.

### Key Evidence

- Strategic Housing Market Assessment for Ipswich and Waveney Housing Market Areas (Part 1) (May 2017)

### Introduction and context

In the adopted 2014 Core Strategy for Babergh, the current housing requirement is 5,975 dwellings (2011 – 2031) and under the 2012 Core Strategy Focussed Review the current housing requirement for Mid Suffolk is 6,450 dwellings (2012 to 2027). In Babergh, the current annual housing requirement is phased in that the requirement was set at 220 dwellings per year over 2011 – 2016 and 325 dwellings per year thereafter. In Mid Suffolk, the current annual housing requirement is 430 dwellings per year.

The Councils cannot simply carry forward these existing requirements. The NPPF (para. 159) requires local plans to be based on up to date evidence, and in relation to housing requirements requires local planning authorities to *'prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries'*. There is an important difference between housing needs (known as 'objectively assessed need'), and housing requirements. As the name suggests, the former is an objective, technical assessment of the needs for housing. The latter is the requirement that is ultimately adopted through the Local Plan and is influenced by other factors such as the need to accommodate unmet need from elsewhere, a

decision to increase the requirement to deliver more affordable housing or by a Council's aspirations for higher levels of growth.

In relation to objectively assessed needs, the NPPF (para. 47) states that planning authorities should *'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework'*. In other words, there is an assumption that a local authority will meet its objectively assessed need unless there are genuine planning reasons which preclude it from doing so.

National policy aside, the Councils recognise the importance of delivering the homes that people need and a key objective for the Plan is to deliver *'...the right types of houses, of the right tenure, of the right tenure, in the right place.'*

In simple demand and supply terms, not delivering enough homes (whether market or affordable) is likely to exacerbate issues of affordability. Further, the supply of houses is contiguous with economic growth. This is recognised in the Government's recent Green Paper 'Building our Industrial Strategy', which states that 'housing is a key factor in driving economic growth'. The New Anglia Local Enterprise Partnership state in their Strategic Economic Plan that 'we see housing affordability and availability as a key competitive advantage in attracting inward investment'. Through the Plan the Council is seeking to maintain a sustainable balance between housing and employment opportunities

## Strategic Housing Market Assessment

In September 2016, the Councils jointly commissioned Peter Brett Associates to produce a Strategic Housing Market Assessment (SHMA) with Ipswich Borough, and Suffolk Coastal and Waveney Districts. Part 1 of the SHMA focusses on identifying Objectively Assessed Needs (OAN), i.e. how much housing is needed.

The SHMA initially establishes the Housing Market Area (HMA). This is important because the NPPF requires OAN to be met in the HMA. In real terms, this means that if one authority in an HMA cannot meet its need, for genuine planning reasons, other authorities in the HMA need to consider whether they could help meet it. The definition of the HMA is based upon an analysis of the places where people move house to and from, how they travel to work and whether

there are broad similarities in the housing market. The SHMA concludes that Babergh and Mid Suffolk Districts sit within the Ipswich HMA along with Ipswich and Suffolk Coastal. Waveney forms its own HMA.

Following guidance set out in the national Planning Practice Guidance, the SHMA considered trends in migration over previous years and the likelihood of these being repeated, the rate at which households are likely to form, whether there are any ‘market signals’ (such as delivery and affordability) which indicate that past trends have been influenced by supply, and whether there would be enough homes to meet forecast jobs growth.

The SHMA concludes the following OAN for Babergh and Mid Suffolk:

Local Authority	Objectively Assessed Need (2014-2036)	Annualised Objectively Assessed Need
Babergh	7,820	355
Mid Suffolk	9,951	452
Ipswich Housing Market Area total	39,300	1,786

## Setting the housing requirement

The OAN essentially represents a ‘starting point’ in identifying housing requirements for Babergh and Mid Suffolk. There are a number of other factors to consider when setting the requirement.

## Supply

The Councils have conducted two rounds of ‘call for sites’ – one in 2014 which focused on sites over 2 hectare and a further one in 2016 which lowered the threshold to 0.25 hectares in line with Government guidance. As large, rural Districts the Councils would not expect there to be a shortage of potential supply to meet OAN. The Strategic Housing and Employment Land Availability Assessment<sup>26</sup> indicates that there is sufficient supply of land to meet the OAN.

## Affordable housing need

The national Planning Practice Guidance requires planning authorities to consider affordable housing<sup>27</sup> need in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. The national Planning Practice Guidance<sup>28</sup> (PPG) states that an increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes. Part 2 of the SHMA has identified affordable needs for Babergh of 73 households per annum and for Mid Suffolk of 97 households per annum over the period to 2036. The affordable need identified for this purpose includes consideration of the existing need for affordable housing as well as future needs for affordable housing. The SHMA considered whether this amount of affordable housing is likely to be able to be delivered within the OAN and concluded for both Districts that an uplift to OAN is not likely to be necessary. This will be revisited throughout production of the Plan alongside considerations of viability.

<sup>26</sup> See Glossary

<sup>27</sup> See Glossary

<sup>28</sup> See Glossary

## Economic growth

As part of the production of the Strategic Housing Market Assessment, the OAN was tested against the forecast jobs growth as identified in the 2016 East of England Forecasting Model. It is important to note that if jobs growth is to be planned for at a level higher than the forecast, the OAN would need to be tested against this higher level.

## Deliverability

The Councils can opt to plan for a housing requirement which exceeds OAN as a matter of policy choice. However, it is important to understand the likelihood of higher levels of growth being delivered. Analysis of delivery in recent years suggests that exceeding OAN could prove challenging. The work underway in relation to the Suffolk Strategic Planning and Infrastructure Framework could result in alternative delivery mechanisms being pursued, and the outputs from this will be considered in due course.

As the requirement relates to the period 2014 – 2036, it should be noted that a number of dwellings are already accounted for via completions and commitments as set out in the table below. These will contribute to meeting the requirement.

	Net Completions 2014/15 – 2016/17	Net Dwellings with permission as at 1.4.2017	Net Dwellings with resolution to grant subject to S106 as at 1.4.2017	Residual requirement (OAN minus completions and committed dwellings as at 1.4.2017)
<b>Babergh</b>	560	2,320	730	4,210
<b>Mid Suffolk</b>	1,030	2,480	620	5,820

(All figures rounded to the nearest 10)

There are also sites currently allocated for housing in the Districts' adopted plans. It is not appropriate to take account of these in arriving at the residual as they will be reviewed as part of the production of the Joint Local Plan. In some circumstances the amount of housing they could provide may change through the production of the plan, for example if an employment element is no longer required and suitable for residential use it would have potential for a revision to the allocation.

## Options

### Option HR1 – OAN

Set the housing requirements at the OAN level:

	Total requirement	Annualised requirement (2014 – 2036)
<b>Babergh</b>	7,820	355
<b>Mid Suffolk</b>	9,951	452

No alternative options are put forward as at this stage, there is no evidence to suggest that the housing requirement should be set at any level other than OAN.

## Housing delivery

As explained in the introduction to this document, a key challenge for the Joint Local Plan is delivery. For housing this means ensuring that the number and type of homes needed are developed when they are needed. Regardless of the housing requirement set within the plan, the Councils consider it prudent to allocate contingency sites in order to provide a degree of certainty that the requirement will be met should the original allocations be substantively delayed or not progress.

This is particularly important when considering that over recent years, delivery has been below adopted requirements, which are lower than the OAN identified for the period covered by the new Joint Local Plan. When considering whether sufficient land has been allocated, an anticipated amount of 'windfall' development (i.e. that not allocated but comes forward for development) will also be accounted for. In addition to a windfall allowance, a contingency could be set out in the form of reserve sites, whereby triggers will be embedded into the plan to signal the circumstances under which reserve sites could be brought forward.

### Options

#### Option HD1 – Apply a contingency

In allocating sites, apply a contingency through a reserve sites approach.

#### Option HD2 – No contingency

Allocate sites to meet the housing requirement (including taking account of the likely contribution from windfall), but do not allocate above the housing requirement.

## Initial Preference

In consideration of issues with housing delivery over recent years HD 1 is considered the more robust option. The allowance for contingency sites provides greater opportunity for the market to deliver housing on suitable sites informed through plan led approach. This option provides alignment to the delivery of the Council's objectives with regard to meeting housing need.

### Consultation Questions:

- Q 7. Do you agree with the proposed approach set out under Option HR1? If not, please explain why and what alternatives you propose.**
- Q 8. When allocating sites what scale of contingency should be applied? Please explain why.**
- Q 9. Are there any specific measures that could be included within the Joint Local Plan that would assist with delivery?**
- Q 10. What factors or priorities should be set as triggers for reserve sites to come forward?**

# Review of the Settlement Hierarchy

## Key Evidence:

- Babergh & Mid Suffolk Settlement Hierarchy Review 2017

## Introduction and context:

The settlement hierarchy<sup>29</sup> in Babergh was last reviewed around 2012 and the Mid Suffolk settlement hierarchy last reviewed around 2007. Both have different structures. The Councils are proposing a single settlement hierarchy for the plan area which provides an opportunity to broadly define typologies of settlement in a consistent manner.

In considering the broad locations for new development, national planning policy requires that sustainable development is applied through balancing social, economic and environmental aspects. Development needs to be accommodated in settlements where the need to travel can be reduced through good access to facilities and services and where significant adverse impacts can be avoided or mitigated.

The existing urban areas and market towns characteristically are known to have a good range of services and facilities which could support sustainable development, subject to detailed assessments of impact such as in relation to infrastructure. The Babergh and Mid Suffolk Ipswich fringe areas have historically been designated as growth areas in recognition of the cross boundary sphere of influence from the county town of Ipswich as a regional service centre. There is no proposal to amend the designations/status of the Ipswich fringe area, existing urban areas and market towns in the new joint settlement hierarchy.

Rural areas however can be patchy and variable in service and facilities provision, and are more complex in their relationship networks with other

settlements. The Councils have therefore focussed the settlement hierarchy review upon rural areas to help establish a broad means by which rural growth can be planned in a sustainable manner. In addition to the settlement hierarchy structure, 'functional clusters' have been drafted to broadly recognise and identify the effective relationships which settlements have with one another across the two districts. It also considers those settlements near the edges of the districts where cross boundary settlement relationships may exist.

A common settlement hierarchy is therefore proposed across the whole of both Babergh and Mid Suffolk districts. The Council is also working with other local authorities in the Ipswich Housing Market Area to consider establishing a consistent settlement hierarchy across the wider area.

This review of the settlement hierarchy uses the Services and Facilities Audit which was carried out over the summer of 2014 for Babergh and during the spring of 2017 for Mid Suffolk. This data was then used to develop a scoring system to rank each settlement. The scoring is kept simple and aims to give a broad indication of the level of services and facilities available in each settlement. The scoring is based on a two points system, where a score of 2 points is given for facilities and services that are judged to be of higher importance in relation to sustainability and vitality of the local community, whilst 1 point is given to the lesser important facilities and services.

For example some services are more essential and used more frequently than others, such as a primary school or a convenience store. As these are important facilities that reduce the need to travel by car and support the vitality of the local community, they are given a score of 2

<sup>29</sup> See Glossary

points. Other facilities such as a village hall or a recreation ground add to diversity and help build communities. Such facilities score 1 point, as the relative contribution is less significant to people's day to day needs. Key services and facilities (scoring 2 points) have been defined as:

- convenience stores
- primary schools
- proximity to a strategic employment site
- doctors surgeries
- chemists / pharmacies
- bus stops (with daily peak-time services to/from a higher order settlement)
- railway station (with daily peak-time services to/from a higher order settlement)
- broadband of up to 76Mb fibre or more (super-fast speed)
- proximity to a town / urban area (within 5km)

Settlements scoring a total of 18 points and over are categorised as Core Villages, settlements scoring 9 to 17 points are categorised as Hinterland Villages, and settlements scoring 0 to 8 points are classified as Hamlets and Countryside.

The full methodology and criteria used to review the settlement hierarchy is available within the supporting Topic Paper: Settlement Hierarchy Review 2017.

## Summary of options

The realistic and appropriate policy options considered are summarised below:

### Option SET1 – Key services.

A review of settlements based upon recognising key facilities / services only.

### Option SET2 – Key & supporting services.

A review of settlements based upon a weighted scoring system recognising relationships to higher order settlements, key services and supporting services

The option of drafting a settlement hierarchy simply according to measurement of rural settlement size of population or existing housing stock, was discounted as it was considered too simplistic and many rural settlements of a significant size could be misrepresented if they do not have good access to key services and facilities.

An extended criteria range of services and facilities was also discounted as a disproportionate approach, as this would be unlikely to distinguish any significantly greater sustainability characteristics.

## Initial preference

The Council's indicative preferred option is **SET2 – Key & Supporting services**. This is considered to represent a proportionate approach to defining a modern joint settlement hierarchy, as a basis to scope which settlements could support appropriate new development. Based upon this approach, a proposed joint settlement hierarchy is set out opposite:



Proposed Joint Settlement Hierarchy Categories for Babergh and Mid Suffolk	Settlement name
<b>Ipswich fringe area</b>	Akenham Barham Belstead Bramford Claydon Copdock and Washbrook Great Blakenham Pinewood Sproughton Wherstead Whitton
<b>Urban areas &amp; Market towns</b>	Eye Hadleigh Needham Market Pinewood* Stowmarket Sudbury (including part of Chilton and part of Great Cornard)
<b>Core Villages</b>	Bacton Badwell Ash Bildeston Botesdale and Rickinghall Boxford Bramford* Brantham Bures St Mary Capel St Mary Chelmondiston Claydon and Great Blakenham* Cockfield Coddtenham Combs Creting St. Mary Debenham East Bergholt Elmsett Elmswell Fressingfield Gislingham Glemsford Great Waldingfield Haughley Henley Holbrook Lavenham Long Melford Mendlesham Nayland with Wissington Norton Old Newton Shotley Somersham Sproughton* Stoke by Nayland Stonham Aspal Stowupland Stradbroke Stratford St Mary Thurston Walsham-le- Willows Whitton* Woolpit

Proposed Joint Settlement Hierarchy Categories for Babergh and Mid Suffolk	Settlement name	
<b>Hinterland Villages</b>	Acton	Leavenheath
	Aldham	Little Blakenham
	Alpheton	Little Waldingfield
	Ashbocking	Mellis
	Ashfield cum Thorpe	Mendham
	Aspall	Metfield
	Assington	Monk Soham
	Badley	Monks Eleigh
	Barham*	Nedging and Naughton
	Barking	Newton
	Battisford	Occold
	Baylham	Onehouse
	Bedfield	Palgrave
	Belstead*	Polstead
	Bentley	Rattlesden
	Beyton	Raydon
	Brome and Oakley	Redgrave
	Burstall	Rickinghall Inferior
	Buxhall	Ringshall
	Chelsworth	Shotley Gate
	Copdock and Washbrook*	Southolt
	Creeting St. Peter/West	Stoke AshStonham Parva
	Creeting	Stowlangtoft
	Crowfield	Stuston
	Drinkstone	Stutton
	Earl Stonham	Tannington
	East End (East Bergholt)	Tattingstone
	Felsham	Thorndon
	Finningham	Thornham Magna
	Gosbeck	Tostock
	Great AshfieldGreat Bricett	Wattisfield
	Great Finborough	Wenham Magna
	Hartest	Wetherden
	Helmingham	Wetheringsett
	Hessett	Weybread
Hintlesham	Whatfield	
Hitcham	Wickham Skeith	
Horham	Wingfield	
Hoxne	Woolverstone	
Kersey	Worlingworth	
Lawshall	Wortham	
Laxfield	Wyverstone	
Layham	Yaxley	

Proposed Joint Settlement Hierarchy Categories for Babergh and Mid Suffolk	Settlement name	
<b>Hamlets &amp; Countryside</b>	Akenham*	Langham
	Athelington	Lindsey
	Bedingfield	Little Cornard
	Boxted	Little Finborough
	Braiseworth	Long Thurlow
	Brundish	Mickfield
	Brent Eleigh	Milden
	Brettenham	Nettlestead
	Burgate	Offton
	Chattisham	Pettaugh
	Cornard Tye	Preston St Mary
	Cotton	Redlingfield
	Darmsden (new parish)	Rishangles
	Denham	Semer
	Edwardstone	Shelland
	Erwarton	Shelley
	Flowton	Shimpling Street
	Framsden	Somerton
	Freston	Stanstead
	Gedding	Syleham
	Gipping	Thornham Parva
	Groton	Thorpe Morieux
	Harkstead	Thrandeston
	Harleston	Thwaite
	Hemingstone	Wattisham
	Higham	Wenham Parva
	Hinderclay	Westhorpe
	Holton St Mary	Wherstead*
	Hunston	Wilby
	Kenton	Willisham
Kettlebaston	Winston	

\* Located within Ipswich fringe area

### Consultation Questions:

- Q 11. Do you agree with the proposed criteria approach to rank settlements in the hierarchy? If not, please explain a suggested amendment or alternative.**
- Q 12. Do you agree with the proposed joint settlement hierarchy? If no, please provide further details as to how the hierarchy should be amended.**

# Spatial Distribution

## Key Evidence

- Strategic Housing Market Assessment
- Strategic Housing & Economic Land Availability Assessment

## Introduction and context

The existing Local Plan documents in Babergh attribute new housing growth to a balance of urban and rural locations at a ratio of approximately 60/40 with specific land identified in the Hadleigh, Brantham, Sudbury and Ipswich fringe areas. For Mid Suffolk, the existing Local Plan documents attribute new housing growth to a balance of urban and rural locations a ratio of approximately 70/30, with specific land identified in Stowmarket.

The Councils' premise for meeting the new Joint Local Plan identified development needs up to 2036 is that all communities will be expected to make a contribution within the principles of sustainable development. Where the required new growth is located, is therefore an important matter for all communities to positively and proactively consider. However, the characteristics of Babergh and Mid Suffolk districts promote a broad distinction of options over what the overall distribution pattern of growth could be.

For Babergh district, once development already built from 2014-2017 and committed through existing planning permissions has been taken account of, there is a residual need to plan for approximately 4,210 new homes by 2036.

For Mid Suffolk district, once development already built from 2014-2017 and committed through existing planning permissions has been taken account of, there is a residual need to plan for approximately 5,820 new homes by 2036.

This section sets out the district wide options with regard to the overall pattern of growth.

## Options

The options identified are set out below:

### **County town focussed.**

Ipswich is the county town of Suffolk and exerts an influence over a large geographic area for where people live and contribute to the economy. Growing Ipswich with further sustainable growth provides opportunities to Babergh and Mid Suffolk's growing population to access employment, services and facilities,

which in turn helps regenerate the town and bring investment for the improvement of key infrastructure around the town, the surrounding areas and the wider strategic area. Focussed consideration would be given to communities with the strongest functional relationships with Ipswich.

## Babergh

### **Option BHD1 – county town focussed**

Settlement Category	% of district growth
Ipswich fringe area	50%
Urban Areas and Market Towns	25%
Core villages	15%
Hinterland villages	5%
Hamlets & Countryside	5%

## Mid Suffolk

### **Option MHD1 – county town focussed**

Settlement Category	% of district growth
Ipswich fringe area	35%
Urban Areas and Market Towns	30%
Core villages	20%
Hinterland villages	10%
Hamlets & Countryside	5%

### **Market town/rural area balance.**

Since 2001, approximately 60% of new housing growth has come forward in 'rural' areas across Babergh and Mid Suffolk. A large proportion of growth is identified and formally allocated through the plan making process, but a

significant amount of development historically, has also come forward on sites which are not allocated. The Council considers that a mix of urban and rural development is important to maintain the overall success of the area and this has been pattern of growth in recent years.

## **Babergh**

### **Option BHD2 – market town/rural area balance**

<b>Settlement Category</b>	<b>% of district growth</b>
Ipswich fringe area	20%-25%
Urban Areas and Market Towns	25%-35%
Core villages	25%-35%
Hinterland villages	15%
Hamlets & Countryside	5%

## **Mid Suffolk**

### **Option MHD2 – market town/rural area balance**

<b>Settlement Category</b>	<b>% of district growth</b>
Ipswich fringe area	25%-30%
Urban Areas and Market Towns	25%-30%
Core villages	20%-25%
Hinterland villages	15%
Hamlets & Countryside	5%

### **Transport corridor focussed.**

Across the area there is disparity in the extent of key infrastructure availability and capacity. The A14 and A12 roads, and the London-Norwich and Ipswich-Cambridge rail routes are crucial daily transport connections for residents and businesses in the area and beyond. Many settlements with good access to these key routes are successful at attracting services and facilities

and are sustained by new development demand such as housing and employment land. Further sustainable development in these locations could provide opportunities to improve existing facilities and better opportunities to travel by more sustainable patterns and means. Focussed consideration would be given to communities within approx 2km of an A road junction or mainline train station.

## **Babergh**

### **Option BHD3 – transport corridor focussed**

<b>Settlement Category</b>	<b>% of district growth</b>
Ipswich fringe area	25%
Urban Areas and Market Towns	30%
Core villages	30%
Hinterland villages	10%
Hamlets & Countryside	5%

## **Mid Suffolk**

### **Option MHD3 – transport corridor focussed**

<b>Settlement Category</b>	<b>% of district growth</b>
Ipswich fringe area	20%
Urban Areas and Market Towns	35%
Core villages	30%
Hinterland villages	10%
Hamlets & Countryside	5%

### **New settlement focussed.**

Where significant new growth is identified and required, national planning policy encourages Councils to consider whether growth could be accommodated through the planning of new settlements – either garden towns or villages. They are intended to be of a scale of at least 1,500 homes and genuinely new stand-alone

communities, rather than extensions to existing towns or villages. Opportunities are available to bring in enhanced Government investment funds to help plan and support these areas. Careful consideration would need to be given to the final scale of any new settlement to ensure optimal critical mass for supporting infrastructure.

## **Babergh**

### **Option BHD4 – New settlement focussed**

Settlement Category	% of district growth
Ipswich fringe area	20%
Urban Areas and Market Towns	20%
Core villages	15%
Hinterland villages	5%
Hamlets & Countryside	5%
New settlement	35%

## **Mid Suffolk**

### **Option MHD4 – New settlement focussed**

Settlement Category	% of district growth
Ipswich fringe area	20%
Urban Areas and Market Towns	20%
Core villages	15%
Hinterland villages	5%
Hamlets & Countryside	5%
New settlement	35%

### **Consultation Questions:**

**Q 13. Which option(s) for housing spatial distribution do you think is the best? Please explain your answer.**

**Q 14. Are there other realistic broad distribution options which should be considered? Please explain your answer.**

**Q 15. If a new settlement was to be planned in the area, where should it be located? Please explain your answer.**



# Housing Types & Affordable Housing

## Strategic Priorities

Paragraph 156 of the NPPF requires the Local Plan to set out strategic priorities to deliver the homes needed in the area.

## Evidence

- Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment – Part 1 (May 2017)
- Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment – Part 2 (May 2017)

## Introduction and Context

Alongside meeting the overall need for housing, the NPPF also requires local planning authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, identify the size, type, tenure and range of housing that is required in a particular location, reflecting local demand, and to set policies for meeting affordable need on site unless off-site provision or a financial contribution can be robustly justified. Accordingly the Council has set the objective for the Plan to deliver *‘the right type of homes, of the right tenure in the right location’*.

The Strategic Housing Market Assessment (SHMA) identifies a number of key recent trends and current factors relating to housing type, including:

- Between 2001 and 2011, household sizes in Babergh dropped from 2.35 persons to 2.3 persons, and in Mid Suffolk dropped from 2.41 to 2.36 persons;
- Since 2001, in Babergh there has been a decline in couples with dependent or non-dependent children, but an increase in all other household types. Mid Suffolk has seen a particularly high proportionate growth in lone parent households

when compared to surrounding authorities and the England average;

- Both Districts have a relatively high proportion of detached properties and a relatively low proportion of purpose built flats, and a relatively large proportion of properties with four bedrooms or more;
- Both Districts have a relatively large proportion of owner occupied accommodation. Nevertheless, between 2001 and 2011 the number of owner occupiers with a mortgage has decreased, however the number of households living in private rental accommodation increased by 71% in Babergh and 51% in Mid Suffolk;
- Latest figures published by ONS show that both authorities continue to have a high ratio of house prices to residents’ income which indicates low affordability. In 2016 Babergh had a ratio of 9.6 and Mid Suffolk a ratio of 8.8<sup>30</sup>, compared to an England average of 7.2.

## Housing size and tenure

The SHMA (Part 2) identifies the mix of housing required to 2036 in terms of the size and tenure. The SHMA projects that there will continue to be a decline in couple households with children whilst other households will continue to grow. The SHMA shows that across both Districts the greatest need is for market housing for ownership; however there is also a distinct need for private rented accommodation. In terms of the need for affordable housing, the SHMA identified that this represents 19.4% of OAN in Babergh and 17.4% of OAN in Mid Suffolk (social rent/affordable rent and shared ownership).

In terms of size of housing needed, the greatest need is for two, three and four bedroom owner occupied accommodation. However, whilst individually the need for these sizes and tenures is higher than for other sizes and tenures, they equate to just over half of total need in Babergh and just below two thirds of total need in Mid Suffolk.

<sup>30</sup> Ratio of lower quartile house price to lower quartile gross annual residence-based earnings (ONS, 2017).

The SHMA identifies the number of new households that will require private rented accommodation as 1,273 households in Babergh and 1,474 households in Mid Suffolk. This is reflective of the increase in the number of households living in private rented accommodation in recent years.

The Local Housing Allowance is currently based on an assumption that single person households under 35 would live in shared accommodation. This type of accommodation has not typically been provided in Babergh and Mid Suffolk, however in light of affordability issues may become more prevalent over the Joint Local Plan period.

In 2015 the Government published the Nationally Described Space Standards. These set out minimum gross internal floor areas for new residential dwellings and can be applied through adoption of a planning policy which requires the standards to be met. The Planning Practice Guidance (PPG) states that, where the standards are to be applied, this will need to be considered as part of the viability assessment.

## **Older persons housing needs**

The SHMA has identified that the older population will grow significantly across both Districts by 2036 – across the Ipswich Housing Market Area the number of people aged over 65 is expected to rise by 59% by 2036. This needs to be taken into account when considering the type of new housing to be provided. As there are higher levels of disability and health problems amongst older generations, the growth in this population presents key choices in terms of the types of homes that are provided. Principles underpinning Suffolk County Council's provision of Adult and Community Services include aiming to ensure that people can stay in their own home for as long as possible.<sup>31</sup>

The population living in nursing and residential care homes is recorded separately to the

population related to the Objectively Assessed Need for housing (OAN) and is known as 'institutionalised population'. The SHMA identifies needs for 572 nursing and residential care home spaces in Babergh and 1,004 spaces in Mid Suffolk. This is in addition to the need to meet the OAN for housing. It may be however that traditional forms of provision will not be necessary or appropriate in meeting the full extent of this need. The Councils are currently working with Suffolk County Council in considering future models of provision.

The provision of specific types of housing can help to enable people to live in their homes for longer and/or to live in their homes more easily. The Planning Practice Guidance states that Local Plans should, where appropriate, identify specific sites for all types of housing to meet their anticipated housing requirement. The PPG states that this could include sites for older people's housing including accessible mainstream housing such as bungalows and step-free apartments, sheltered or extra care housing, retirement housing and residential care homes, or include criteria based policies or targets for such housing. Nationally, the number of bungalows being built has fallen significantly over recent years, and bearing in mind the increasing ageing of the population it is considered appropriate to consider how they can be provided for through the Joint Local Plan.

## **Specialist accommodation**

The SHMA also identifies the needs for specialist accommodation. In Babergh there is a need for 1,125 sheltered units, 106 enhanced sheltered units and 138 extra care units (2014 – 2036). In Mid Suffolk there is a need for 755 sheltered units, 73 enhanced sheltered units and 176 extra care units. The Councils are currently working with Suffolk County Council in considering future models of provision for households who require support, and it may be that traditional sheltered units will not be the most suitable way in which to meet all future needs.

<sup>31</sup> Adult and Community Services Market Position Statement 2015 – 2016 (Suffolk County Council)

In 2015, the Government introduced two new 'optional' Building Regulations<sup>32</sup> relating to accessible dwellings, which set standards in relation to accessible and adaptable dwellings<sup>33</sup> and wheelchair accessible dwellings<sup>34</sup> which are over and above the minimum requirements. Local authorities can apply these optional standards by incorporating a requirement within their planning policies. As stated above, the SHMA (Part 2) identifies an increasing need for dwellings for the older population and a requirement for accessible dwellings may help to address some of this need. Further, the Joint Health and Wellbeing Strategy for Suffolk<sup>35</sup> identify the provision of greater choice and innovation in housing for those with disabilities as one of its priorities.

## **Starter Homes**

Starter Homes<sup>36</sup> are a defined form of housing provision, as set out in the Housing and Planning Act 2016, subject to a number of restrictions including only being available to first time buyers under the age of 40. Starter Homes must be sold at a discount of at least 20% of the market value and up to a cap of £250,000 (outside London). The Housing and Planning Act 2016 requires planning authorities to promote the supply of Starter Homes. The Housing White Paper, published in February 2017, proposes to amend the definition of affordable housing in order that Starter Homes are encompassed within the definition of affordable housing. However, at present Starter Homes remain outside of the definition of affordable housing.

The SHMA considered the potential role that Starter Homes could play in meeting future housing need, and considered that these could potentially cater for 6.1% of need in Babergh and 5% of need in Mid Suffolk for households who would otherwise be in the private rental sector. The PPG promotes an 'exception site' policy in relation to Starter Homes whereby they would be acceptable on land which has been in industrial or commercial use but which are no longer viable

for this use and where the site is not identified for residential use. Any policy related to Starter Homes on exception sites would need to be considered in relation to the Joint Local Plan's approach towards safeguarding employment land. It may be that there are also alternative approaches to the provision of Starter Homes, for example requiring a certain proportion of Starter Homes on strategic allocations.

## **Self build and custom build**

Since April 2016, Local Authorities in England have been required to maintain a register of households who are interested in obtaining a plot of land to build a home of their own. This is known as the 'Self-build Register'. Further legislation came into effect in October 2016 which, amongst other things, requires local authorities to have regard to their register when carrying out their functions and to grant sufficient 'development permissions' to meet the demand for self-build<sup>37</sup> and custom housebuilding<sup>38</sup> in their area.

As at the end of March 2017, 69 households had been entered onto Babergh and Mid Suffolk District Councils' register. These were split roughly equally between those currently residing in Babergh or Mid Suffolk, and those currently residing elsewhere but who wish to relocate here, and it is not known whether those on the register are also groups or associations. The reasons given for wanting to self-build vary but, typically, most households indicated that they are looking to move closer to family or friends and/or have use of a property designed to meet their specific or longer term needs. Having a property with higher 'eco-performance' levels also features highly. Many of those on the register require a single plot of land, as opposed to land which is part of a larger development. With few exceptions, the majority of households indicated that their main interest lies in a one-off self-build project (either a detached house or bungalow) with 3 or 4 bedroom properties being most popular.

32 See Glossary

33 See Glossary

34 See Glossary

35 A Joint Health and Wellbeing Strategy for Suffolk (Refresh 2016-2019) (Suffolk Health and Wellbeing Board, 2016)

36 See Glossary

37 See Glossary

38 See Glossary

The Call for Sites<sup>39</sup> exercise undertaken in summer 2016 included a request for sites which would potentially be suitable for self-build.

The purpose of the self-build register is to ‘match’ those looking to build a property with sites that would potentially be suitable for them to do so, and to ensure that planning permission is granted to meet demand. However, it is considered important to ensure that this does not lead to dwellings in unsustainable locations where permission would not normally be granted for a dwelling. In this respect, it is not considered necessary or appropriate to apply any alternative planning policy to self-build and custom-build properties.

Self-build and custom-build properties receive exemptions for the purposes of the Community Infrastructure Levy<sup>40</sup>. In determining whether a property is self-build or custom-build specific information is requested in order for the exemption to be applied (for example in relation to self-build and custom-build mortgages). It is intended that the Joint Local Plan will provide clarity over what constitutes self-build and custom-build dwellings.

## Affordable housing

Affordable Housing is defined by the NPPF and includes social rented, affordable rented and intermediate housing. The NPPF requires local plans to meet the full objectively assessed need for both market and affordable housing. The SHMA therefore disaggregates the OAN to identify the proportion that should be delivered as affordable housing. The need for affordable housing is split by tenure – for Babergh the need identified is 12.9% of all new dwellings to be for social rent/ affordable rent and 6.5% for shared ownership (total 19.4%); and in Mid Suffolk the need identified is 12.3% for social rent/affordable rent and 5.1% shared ownership (total 17.4%). In both Districts shared equity housing is identified as being more expensive to access than entry-level private rent, shared ownership and Starter

Homes and for all entry level home ownership other than one bedroom properties, and it is therefore not considered to be suitable for specific consideration through the Joint Local Plan.

Current adopted policies for Babergh and Mid Suffolk require 35% affordable housing to be provided as part of market housing developments<sup>41</sup>. For Babergh, the policy applies to all developments and for Mid Suffolk it applies to sites of at least 15 dwellings or 0.5ha in Stowmarket and Needham Market and to sites of at least 5 dwellings or 0.17ha elsewhere. The Government however introduced a policy in November 2014 which states that affordable housing contributions should not be sought from developments of 10 units or less or which have a maximum combined gross floorspace of 1,000sqm. In Areas of Outstanding Natural Beauty the policy states that planning authorities may choose to set a lower threshold of 5 units or less.

Over the past 5 years, Babergh has delivered 23% affordable housing (as a percentage of all housing developed) and Mid Suffolk has delivered 22%<sup>42</sup>. These figures relate to overall provision and therefore include smaller sites where no affordable contribution is required as well as sites developed for 100% affordable housing. The scale of affordable housing secured via planning obligation has varied and alongside delivery as part of market developments, a number of affordable homes in the Districts have been delivered through sites developed for 100% affordable housing. To meet the full affordable need the requirement will need to be set above the total proportion needed in order to account for no contribution from developments of under ten dwellings and to provide flexibility for instances where site specific circumstances render the full contribution not viable. An appropriate threshold will need to be considered alongside viability considerations, spatial distribution and the approach towards exception sites as part of the production of the Joint Local Plan.

39 See Glossary

40 See Glossary

41 Note that for Mid Suffolk the requirement is ‘up to’ 35%

42 Note the figure for Mid Suffolk excludes 2013/14 data which is incomplete

The Councils currently have rural exception site policies whereby sites outside of, but adjoining (or well-related to in the case of Babergh), settlement boundaries which would not normally be considered suitable for residential development would be permitted as an exception in recognition of the role they play in meeting local needs for affordable housing. The scale and mix of housing on rural exception sites should be informed by a local housing needs survey. The Councils current policies do not allow for a proportion of market housing on these sites, however the NPPF allows planning authorities to consider whether allowing some market housing on such sites would help to bring these developments forward.

Affordable dwellings can be restricted to key workers where housing affordability is causing issues for maintaining employment levels in public sector services.

## **Options**

### **Housing mix**

#### **Option HM1 – Housing mix to accord broadly with SHMA**

Set a broad requirement for a mix of housing to be provided as part of all housing developments, with the precise nature of the mix to be determined by the market. Under this option developments would be expected to broadly follow the mix identified in the SHMA; or

#### **Option HM2 – Requirement for specific dwelling types**

Responding to the conclusions of the SHMA, including in relation to the increasing numbers of older people, require:

- a) A proportion of accessible and adaptable dwellings (Part M4(2) of the Building Regulations) on sites over 10 dwellings;
- b) A proportion of bungalows on sites over 10 dwellings;

Under this option, bungalows would be required to remain as such in perpetuity through removal of Permitted Development rights; and

#### **Option HM3 – Residential and Nursing Homes and specialist housing**

Include a policy supporting the development of residential and nursing homes and specialist housing (sheltered, enhanced-sheltered and extra care). Such developments would be expected to be within or well connected to urban areas or larger villages on the basis that they are employment generating uses as well as housing.

## Initial preference

The Councils' initial preference, in line with options HM2 & HM3, is to require the mix of housing to include accessible dwellings and bungalows as the increase in the elderly population is projected to be significant over the Joint Local Plan period. The requirements will be subject to viability testing throughout the production of the Joint Local Plan. The Councils' initial preference is also to include policies to facilitate the development of care and nursing homes and specialist housing. Combined it is considered that this approach provides the greatest opportunity to deliver the NPPF requirements and the Councils' objectives on meeting housing need.

## Options

### Affordable housing

#### Affordable housing need

#### **Option AH1 – Setting a requirement for affordable housing**

Continue to require a proportion of affordable housing for all residential developments of more than ten dwellings or over 1,000sqm gross floorspace, with the aim of meeting the full need for affordable housing.

It is not considered appropriate to identify a specific alternative as this requirement would appear to support delivery of affordable housing as identified through the SHMA. Specific requirements will need to be considered alongside viability testing, the spatial strategy and the approach to exception sites.

#### Rural Exception sites

#### **Option RE1 – No market housing on rural exception sites**

Include a rural exception site policy but do not allow for an element of market housing on rural exception sites; or

#### **Option RE2 – Market housing supported on rural exception sites**

Include a rural exception site policy which would support an element of market housing where this is necessary to bring the site forward and where the scale is proportionate to the overall aim of delivering affordable housing.

## Initial preference

The Councils' initial preference is to bring forward delivery of rural exception sites. Should an element of market housing be required to render such proposals viable, the policy approach would support this (as per option RE2).

### Consultation Questions:

- Q 16. Should the Joint Local Plan include a requirement for new dwellings to meet the Nationally Described Space Standards?**
- Q 17. Do you have any views on the proposed approach towards self-build and custom build dwellings?**
- Q 18. What should the Councils' approach to Starter Homes be?**
- Q 19. Should the Councils be prioritising the provision of any particular types of homes?**
- Q 20. Are there any other types of housing that should be planned for / required?**
- Q 21. How can the Councils promote / facilitate development of homes for private rent?**
- Q 22. In relation to affordable housing, do you consider the requirement should be set at a percentage other than the current 35%? If so, please provide reasons.**
- Q 23. To what extent should affordable housing be (or not be) prioritised over provision of other infrastructure where viability is an issue?**
- Q 24. In relation to affordable housing, should there be any preference for housing to accommodate key workers?**
- Q 25. If Option RE2 is supported, what maximum percentage of market housing should be acceptable?**

# Rural growth and development

**Objective - Delivering growth, services and facilities in rural towns and villages.**

## Strategic Priorities

Paragraph 156 of the NPPF requires the Local Plan to set out strategic priorities to deliver the homes needed in the area.

## Key Evidence

- AMR delivery rates
- Current policy context
- Rural Facilities
- Settlement hierarchy and cluster profiles

## Introduction and context

Sustainable development is at the heart of planning. The location of development is a critical determinant on its sustainability and has a significant effect on the extent to which it contributes socially, economically and environmentally.

Over recent years in Babergh and Mid Suffolk a significant proportion of housing development has come forward in rural towns and villages. This is despite the planned approach to growth which has sought to concentrate the greatest proportion of growth in the main towns of Hadleigh, Sudbury, Stowmarket and Eye allocated in strategic development sites. On a number of the allocated sites development has not progressed as quickly as anticipated in the current Plans.

Through the preparation of the Plan, we will need to consider whether the approach taken to allocations in the previous plans remains the right approach to shape the District up to 2016. National policy sets out that development should be distributed in a way which reduces the need to travel, supports the retention of existing services and helps to sustain rural areas.

The existing policy framework makes provision

for rural growth which is essential to help meet housing need, sustain local services and facilities and support the ongoing prosperity and vibrancy of the Districts.

The NPPF (para 55) provides the following guidance: *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances.”*

Whilst the policy approach in Babergh and Mid Suffolk has differed in the respective adopted local plans the overall approach to broad locations for development has similarities in seeking to concentrate development towards towns and the larger settlement with more limited and proportionate growth across the largely rural hinterland, generally avoiding isolated development in the countryside. Both authorities however have policy provision for special circumstances where isolated development in the countryside would be supported, such as rural workers dwellings, consistent with the NPPF, paragraph 55.

The approach taken in Mid Suffolk's Local Plan and Core Strategies has been to allocate sites for development. For sites located beyond settlement boundaries land was treated as open countryside. The majority of the allocations have been completed and there is a reliance on windfall development to meet housing need. Many of the settlements have already expanded beyond the existing defined settlement boundary.

In Babergh, the Core Strategy (policy CS11) aimed to provide greater flexibility to accommodate new development and growth in rural areas through a criteria based approach to proposing and managing development on the



edge of the built up area boundary. However, many of the settlements have already expanded beyond the built up area boundary. Furthermore, there has been criticism from both communities and developers that the approach taken through Policy CS11 lacks certainty. The approach has only been applicable to core and hinterland villages without having regard to smaller settlements. Development proposals for small scale growth in these 'hamlet' type communities, through existing policy has been assessed as development in the 'open countryside' with a requirement for justifiable need and exceptional circumstances. This has been considered to be overly restrictive by many communities and has restricted to their ability to meet housing need and support local services and facilities.

Supporting the vitality of rural communities, through meeting local housing need and securing the retention of services and facilities are key objectives of the Council. In order to ensure that such communities remain sustainable, a level of development is essential to ensure provision of homes, jobs and services. With overly restrictive policies on development in the rural areas housing need would not be met and there would likely be ongoing loss of essential rural services and facilities.

Babergh and Mid Suffolk areas have delivered the housing development in urban and rural areas. Whilst planned growth has had more growth allocated in urban areas, it is in the rural areas that the greatest proportion of growth has been delivered at a ratio of approximately 60:40 compared to in the towns. This is a reflection of both the extensive rural hinterland of the Districts with a network of inter connected settlements of towns and villages which support a range of services and facilities.

There is potential to include a policy in the Plan which would support appropriate infill development in 'hamlets' (considered to be a nucleus of at least 10 dwellings fronting the

highway) which would not cause undue harm to the character and appearance of the cluster and would not consolidate settlements or result in ribbon development.

Through the preparation of the new Joint Local Plan, the Council will need to consider which approach is the most sustainable to enable development in rural communities.

## Options

### Rural growth

The settlement hierarchy defines settlements as towns, core villages, hinterland villages, hamlets and the open countryside.

#### **Option RG1 – A Policy Criteria based approach**

Continuation of the Babergh Core Strategy CS11 Policy Approach using criteria based policy to assess each case on its individual merits;

or

#### **Option RG2 – Allocations with flexibility for small scale infill.**

Allocate sites in towns and core villages to provide certainty on the principle and potential scale of large development. For hinterland villages review the current defined boundaries and have criteria based approach to enable proportionate development in hinterland villages and infill development in hamlets and clusters of 10 or more dwellings.

## Initial Preference

Policy approach Option RG 2 provides greater certainty whilst maintaining flexibility on small scale sites. This approach is considered to most appropriate to deliver... 'the right type of homes... in the right place', thereby supporting the sustainability of rural communities.

## Options

### Hamlets

#### Approach to infill in hamlets

**Option HG1 – continuation of the current approach which would classify hamlets as open countryside in the settlement hierarchy;**

Or

**Option HG2 - Include a policy in the new Joint Local Plan which would support appropriate infill development in ‘hamlets’ (considered to be a nucleus of at least 10 dwellings fronting the highway) which will not cause undue harm to the character and appearance of the cluster, would not consolidate settlements or result in ribbon development. Proposed policy criteria could be as follows:**

- There is a defined nucleus of at least ten dwellings adjacent to or fronting an existing highway;
- The scale of development consists of infilling by one detached dwelling or 2 semi-detached properties within a continuous built up frontage along the highway;
- It would not cause undue harm to the character and appearance of the cluster or any harmful visual intrusion into the surrounding landscape;
- Particular care will be exercised in sensitive locations such as conservation areas and the Area of Outstanding Natural Beauty; and
- The cumulative impact of proposals will be a major consideration.

## Initial Preference

Policy option HG2 provides flexibility to enable limited growth in hamlets which would be proportionate and support the existing communities, consistent with the NPPF and the Councils’ objective to support strong and healthy communities.

### Consultation Questions:

- Q 26. Which option for the policy approach to rural growth do you think is most appropriate?**
- Q 27. Are there any other approaches to distributing development in rural areas that we should consider?**
- Q 28. Do you support the approach proposed for hamlets? If not please explain?**

# Accommodation Needs of Gypsies and Travellers

## Strategic Priorities

Paragraph 156 of the NPPF requires the Local Plan to set out strategic priorities to deliver the homes needed in the area.

## Key evidence

- Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney (May 2017)

## Introduction and Context

National planning policy is set out in Planning Policy for Travellers' Sites<sup>43</sup>. This requires Local Planning Authorities to set pitch targets for Gypsies and Travellers and Travelling Showpeople which address the likely permanent and transit accommodation needs of travellers in their area.

Planning Policy for Travellers' Sites requires planning authorities, in producing their Local Plan, to identify a supply of specific, deliverable sites to provide 5 years' worth of sites against locally set targets, to identify a supply of specific, developable sites, or broad locations for years 6-10 and, where possible, for years 11-15.

The Councils commissioned the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) to identify the needs for Gypsy and Traveller and Travelling Showpeople's accommodation. The need is calculated over the period 2016 – 2036 as the surveys of existing households were undertaken in 2016.

## Permanent Sites

In Babergh, there is currently one permanent Gypsy and Traveller site<sup>44</sup> (comprising one pitch) and in Mid Suffolk there are a number of sites with a varying number of pitches. All sites in Babergh and Mid Suffolk are private sites – there are no local authority owned or managed sites.

For permanent sites, need for additional pitches is identified in the table below. Whilst in Mid Suffolk there is an over-supply in purely numerical terms, at the time of the assessment there were a large number of vacant pitches, some of which may not in reality be genuinely available. The assessment therefore also includes an analysis of need which takes into account the likely genuine availability of pitches. This is also presented in the table overleaf.

<sup>43</sup> Planning Policy for Travellers' Sites (DCLG, 2015)

<sup>44</sup> See Glossary

	Existing occupied authorised pitches	Need 2016-21	Need 2021-26	Need 2026-31	Need 2031-36	Need 2016-36
<b>Babergh</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>
<b>Mid Suffolk (numerical)</b>	<b>38</b>	<b>-5</b>	<b>4</b>	<b>5</b>	<b>5</b>	<b>9</b>
<b>Mid Suffolk (with availability considerations)</b>	<b>38</b>	<b>16</b>	<b>4</b>	<b>5</b>	<b>5</b>	<b>30</b>

The needs assessment concludes that smaller sites are preferred and that most families would prefer to live on privately owned, family sized sites. Expansion of existing sites might be sought where pitches are required for other family members.

It is not necessary to allocate sites in Babergh due to the low level of need which only relates to the latter part of the plan period. A criteria based policy will be established which will enable any proposals coming forward within Babergh to be considered.

Protecting existing authorised sites, by way of an allocation and a policy which restricts permission for other uses may help to ensure that in the future Gypsy and Traveller sites remain genuinely available for that use. This is particularly important in an area such as Mid Suffolk where provision is made up of a number of relatively small, privately-owned sites.

## Transit Sites

Working together, the Suffolk local authorities are currently seeking to identify and develop three transit sites<sup>45</sup> across the county, in locations which correspond to the pattern of unauthorised encampments witnessed over recent years. A call for sites was undertaken in September 2015. The 2017 assessment concludes that this work should continue and Babergh and Mid Suffolk District

Councils will therefore continue to work with the other Suffolk Councils in this respect.

For shorter visits where families usually only stop for a few days, the assessment recommends that the authorities identify negotiated stopping places. These are locations which are not permanently set up for use by Gypsies and Travellers but which could accommodate families when needed. These can also be used for events which bring a large number of family members to an area and may not require planning permission if they are only to be used for less than 28 days a year.

As work is already underway across Suffolk to identify 3 transit sites, it is not appropriate to consider any alternative options. However, it will be necessary to ensure that a policy is in place against which planning applications for transit sites can be considered. It is proposed that this policy would cover minimising impacts on amenity and avoiding dominance of the nearest settled community, avoiding flood zone 3 and only permitting pitches in flood zone 2 where the exception test is passed (on account of caravans being classed as 'highly vulnerable' uses) and ensuring that the site is well related to the road network and to the geographical pattern of unauthorised encampments.

<sup>45</sup> See Glossary

## Travelling Showpeople

Whilst there are currently no Travelling Showpeople's yards in Babergh, there are four yards<sup>46</sup> in Mid Suffolk containing between them 6 currently occupied plots. The need for plots to 2036 for Travelling Showpeople is set out below.

	Existing occupied plots	Need 2016-21	Need 2021-26	Need 2026-31	Need 2031-36	Need 2016-36
<b>Babergh</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Mid Suffolk</b>	<b>6</b>	<b>4(5)</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>7(8)</b>

The figures shown in brackets relate to need should a currently vacant plot not be genuinely available.

Similar to Gypsy and Traveller needs, the assessment concludes that most families would prefer to live on small, family sized sites. Yards do however need to have sufficient space for storing and maintaining large pieces of equipment.

There is no need to allocate sites in Babergh for Travelling Showpeople as no need is identified, however a criteria based policy will be established in order to consider any planning applications.

<sup>46</sup> See Glossary

## Options

### Permanent Gypsy and Traveller Sites

#### **Option GT1 – Allocate site(s) to meet identified requirements**

Under option GT1 site(s) would be allocated to meet the identified need for permanent sites in Mid Suffolk. This could include allocating extensions to existing sites where this can be accommodated; or

#### **Option GT2 – Allocate sites for Gypsy and Travellers as part of residential allocations**

Under option GT2 sites for Gypsies and Travellers would be identified as part of larger housing allocations in Mid Suffolk.

### Travelling Showpeople's yards

#### **Option TS1 – Allocate site(s) to meet identified requirements.**

Under this option one or two yards could be allocated in Mid Suffolk to meet the need identified between 2016 - 2021. The ANA concluded that there is little potential for expansion of existing sites within Mid Suffolk. For the latter part of the plan period, due to the low level of need identified the option would rely on a criteria based policy.

An alternative option is not proposed as, due to the nature of storage required in relation to yards for Travelling Showpeople it is not considered appropriate to consider allocating sites as part of larger residential allocations.

### Existing authorised pitches and plots

#### **Option EGT1 – Protect existing authorised pitches and plots**

Under this option existing, authorised Gypsy and Traveller Pitches and Travelling Showpeople's yards would be allocated for that use and are protected as such.

## Initial preference

The initial preference is to adopt either of options GT1 and GT2 in relation to the provision of permanent sites for Gypsies and Travellers by allocating a site or sites which will meet the need identified and reflect the preference for small family owned sites. This option is in accordance with the NPPF (para. 156) and the Councils' objectives in relation to meeting housing need. The scale of new allocations required will be dependent upon the extent to which existing sites are genuinely available.

The initial preference in relation to yards for Travelling Showpeople is to allocate a site to meet need for the first five years, as per Option TS1, but to provide flexibility through a criteria based policy in recognition of the relatively low level of need arising in the latter part of the plan period.

The Councils also have an initial preference to allocate existing authorised pitches and yards as per option EGT1 to provide increased protection against other uses and therefore greater certainty that they will remain available for use by Gypsies and Travellers.

In relation to all types of provision for Gypsies and Travellers outlined above it is proposed that a criteria based policy would also be included to assess proposals. In line with the national Planning Policy for Travellers Sites, specific criteria related to Gypsy and Traveller sites would cover the need to ensure that there is suitable access to healthcare and education, minimising impacts on amenity and avoiding dominance of the nearest settled community, and avoiding flood zone 3 and only permitting pitches in flood zone 2 where the exception test is passed (on account of caravans being classed as 'highly vulnerable' uses). The criteria based policy would also reflect the fact that the need arising in Babergh and Mid Suffolk relates generally to a need for small, family, sites and would provide some flexibility for families in relation to location and size of site (for example in relation to extensions to existing sites).

### **Consultation Questions:**

**Q 29. What should the Councils' approach to provision of negotiated stopping places be?**

**Q 30. Please submit details of any sites, or extensions to existing sites, which you consider are suitable for allocation as Gypsy and Traveller sites or Travelling Showpeople sites.**

Reflecting their landscape and ecological importance, the majority of the estuaries in Babergh form part of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and the Stour and Orwell Estuaries Special Protection Area. The development and management of moorings for houseboats must therefore reflect the purpose and significance of these designations.

## **Caravans and Houseboats**

Caravans and houseboats are specific types of housing and their provision is part of the Objectively Assessed Need. The Housing and Planning Act 2016 requires local authorities to consider the needs of those who reside in caravans and houseboats.

As part of the production of the SHMA consideration was given to the role of mobile homes and caravans in the provision of housing across the Districts. Analysis undertaken as part of the SHMA identified that mobile homes do not provide an alternative affordable market solution as modern mobile homes are not priced significantly below second hand traditional homes.

In terms of houseboats, the analysis presented in the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney (May 2017) identified a need for 10 additional residential moorings for houseboats in Babergh over the Joint Local Plan period. Mid Suffolk does not have locations where houseboats are moored and no need is therefore identified.

The 2006 Babergh Local Plan contains an established policy in relation to Pin Mill whereby an area is defined within which a maximum of 28 houseboats may be moored.

### **Consultation Questions:**

**Q 31. Should the Joint Local Plan include a policy which identifies areas where moorings would be acceptable in principal?**

**Q 32. If so, are there any specific locations where additional moorings could be located?**

# Economic Needs

## Strategic Priorities

Paragraph 156 of the NPPF states that strategic priorities should include the provision of retail, leisure and other commercial development.

## Key evidence

- Ipswich Economic Area Employment Land Needs Assessment (ELNA)
- Ipswich Economic Area Employment Land Supply Assessment (ELSA)
- Ipswich Economic Area Sector Needs Assessment (SNA)
- Babergh and Mid Suffolk Strategic Housing & Economic Land Availability Assessment (SHELAA)

## Introduction and context

National planning policy requires Local Plans to promote economic growth proactively and address barriers to investment.

Babergh and Mid Suffolk sit within the Ipswich Functional Economic Area (FEA)<sup>47</sup> along with Ipswich Borough and Suffolk Coastal Districts. Economic sub-areas identified in the FEA and which relate to Babergh and Mid Suffolk include the Felixstowe – A14 corridor, the Wider Ipswich Market Area and the A140 corridor.

The Council has objectives to ‘*encourage the development of employment sites and other business growth, of the right type, in the right place and encourage investment in skills and innovation in order to increase productivity.*’

## Existing Employment Areas

The existing local plans for Babergh and Mid-Suffolk protect existing employment sites from development for other uses, in Babergh by the identification of existing employment areas and in Mid-Suffolk by a criteria-based policy. This helps to maintain a stock of offices, warehouses and factories and ensures that the function of the employment area is not undermined by other

uses. The Councils will need to consider through the new Joint Local Plan whether to continue to protect these areas and whether the areas currently protected are the right areas to protect in the future.

## New Employment Land

The Councils have commissioned an Employment Land Needs Assessment (ELNA), a Sector Needs Assessment (SNA) and Employment Land Supply Assessment (ELSA) to advise on the amount of employment land that needs to be provided and the sites that are best placed to meet these needs.

The SNA concludes that based on the 2016 East of England Forecasting Model (EEFM)<sup>48</sup> between 2014 and 2036 the total number of jobs is expected to grow by 3,640 in Babergh and 6,450 in Mid-Suffolk. Of these the net jobs growth in offices, industry and distribution (the B class uses) for the period 2014-2036 is forecast to be 1,020 in Mid-Suffolk and 595 in Babergh. In both areas the number of jobs in offices and distribution are expected to increase whilst the number of jobs in manufacturing is expected to decrease.

Based on the forecast jobs growth the net employment land requirements for 2014-2036 are forecast to be 2.9 hectares in Babergh and 9.4 hectares in Mid-Suffolk.

As of 1st April 2015 there were some 113.41 hectares of employment land available in Mid-Suffolk (including 10.9 hectares at Cedars Park, 39.5 hectares at Mill Lane, Stowmarket and 51.3 hectares at Eye Airfield) and 86.06 hectares in Babergh (including 20 hectares at Chilton Woods, Sudbury and 35.5 hectares at the former sugar-beet factory site in Sproughton).

On the face of it there is therefore more land available than the forecast needs in both Districts. However, the EEFM, on which these forecasts are based, does not necessarily reflect local drivers of growth (such as housing growth, transport

<sup>47</sup> See Glossary

<sup>48</sup> See Glossary



improvements, education improvements, enterprise zones and ports growth) which may result in a higher number of jobs than forecast. The forecasts are based upon past trends and therefore may not represent the full potential for employment growth in the Districts if growth has been constrained in the past. The SNA therefore also considers local factors that may result in a different level of growth than that forecast by the EEFM. It suggests that there may be stronger growth in a number of sectors, including agriculture, computing and technology, education, energy, health and care, hospitality and leisure and advanced manufacturing and engineering. Therefore whilst the Councils will need to ensure that there is sufficient land to meet the needs projected, there is also a need to ensure that there is scope for more land to be available should more employment be created than forecast by the EEFM. Also there is a need to take into account the continuing need for employment land beyond the plan period.

A further factor is that there are uses outside the B class<sup>49</sup> for which suitable sites are difficult to find and are often best accommodated on employment sites. These include car showrooms, tyre and exhaust centres and building material stores. Sufficient land therefore needs to be allocated to accommodate these types of uses in addition to the B class uses.

Business formation rates are identified as being particularly low in Mid Suffolk. The Joint Local Plan will need to consider how planning policies can support new businesses to develop in locations outside of allocations whilst ensuring that impacts on communities can be minimised.

Delivering the housing needed will be important in ensuring that there is a supply of working-age population to support economic growth. If a higher level of economic growth is pursued it may be necessary to increase the housing requirement.

<sup>49</sup> See Use Classes in Glossary

## Options

### **Option ECON1 – Allocate to identified need**

To allocate the minimum amount of employment land to accommodate the jobs growth forecast by the East of England Forecasting Model

### **Option ECON2 - Allocate above identified need**

To allocate more employment land than that required to meet the jobs growth forecast by the East of England Forecasting Model

## Initial Preference

The Councils' initial preference is to allocate more land than is required to meet the forecast jobs growth to ensure flexibility and choice, in line with **Option ECON2**.

## Consultation Questions:

- Q 33. Should we continue to identify existing employment areas and protect land and premises in these areas from redevelopment/conversion to other uses unless marketing evidence demonstrates there is no demand for employment use?**
- Q 34. If we continue to protect existing employment areas, which areas should be identified?**
- Q 35. Are there any existing employment areas that could be reallocated to other uses?**
- Q 36. Should we identify areas where non-B class uses, such as car showrooms, tyre and exhaust centres and building material stores, can be located?**
- Q 37. Should there be a policy that allows a wider range of uses than just B class on all employment sites or selected employment sites?**
- Q 38. Should we allocate more than enough land to meet the forecast needs to enable more choice in the market and give flexibility to changing circumstances?**
- Q 39. Should we make specific employment provisions for small and medium sized enterprises? If so, how and where?**
- Q 40. If we expand, or allocate additional employment land where should these be?**
- Q 41. What approach should we take to supporting new business formation across the Districts?**

# Town Centres and Retail

## Strategic Priorities

Paragraph 156 of the NPPF requires the Local Plan to set out strategic priorities in relation to the provision of retail, leisure and other commercial development.

## Evidence

- Babergh and Mid Suffolk Joint Town Centres and Retail Study (2015)

## Introduction and Context

As Babergh and Mid Suffolk are largely rural Districts, the towns and core villages within them serve an important function in the provision of shopping, employment and leisure opportunities. Functional clusters have been identified across both Districts (see 'Places' section of this document) within which a Town or Core Village acts as a 'hub' for local service provision. The greater range of services and facilities provided in the towns also serve a wider catchment.

The NPPF states that planning policies should promote competitive town centre<sup>50</sup> environments and within this should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality.

In 2015, the Councils commissioned a Retail and Town Centres Study for both Districts to identify the strengths, weaknesses and opportunities of key centres, and the capacity for further retail and commercial leisure development. The study identified that nationally per capita retail expenditure has been recovering following its low point in 2009 and is predicted to grow over future years. Internet trading is also predicted to continue to grow and is itself leading to demand for new types of spaces such as 'click and collect' facilities. Pressure for out of centre<sup>51</sup> development is reported to continue as traditional units within existing centres often do not meet retailer demands for larger, modern floorspace. A significant recent trend in the convenience<sup>52</sup>

goods sector has been the move away from large supermarkets towards smaller convenience stores by the main supermarket chains. Food, beverage and leisure uses, such as restaurants, cafes and gyms, are becoming increasingly important in attracting and retaining people to town centres.

Across Babergh and Mid Suffolk, a high proportion of retail expenditure, particularly on comparison<sup>53</sup> goods, is 'leaked' to nearby larger towns including Ipswich, Bury St Edmunds and Colchester, with the town centres in the Districts generally performing a more localised role. The proportion of 'leakage' to other centres is more notable in Mid Suffolk than in Babergh.

The Joint Local Plan proposes that the settlements defined as towns or urban areas in the existing adopted plans remain defined as 'urban areas and market towns'<sup>54</sup>:

- Babergh – Sudbury/Great Cornard and Hadleigh
- Mid Suffolk – Stowmarket, Needham Market and Eye

The Retail and Town Centres Study differentiates between the role of the different sized towns and identifies Sudbury, Hadleigh and Stowmarket as the main towns centres which should be the focus for new retail and town centre uses. Needham Market and Eye, along with Debenham, are identified as having a District Centre role.

## Retail capacity and allocations

Retail capacity is the amount of retail floorspace required over a set period and is based on projected expenditure. The Retail and Town Centres Study identifies additional capacity to 2031<sup>55</sup> as follows:

50 See Glossary

51 See Glossary

52 See Glossary

53 See Glossary

54 See Review of the Settlement Hierarchy section of this document. 'Urban areas and market towns' also includes Pinewood.

55 Note that although the Local Plan will cover the period to 2036, identifying retail capacity over the longer term becomes less reliable. The Study breaks down the need into time periods to 2020, 2025 and 2031.

Centre	Convenience (m <sup>2</sup> net)	Comparison (m <sup>2</sup> net)
<b>Babergh</b>		
Sudbury town centre	751	4,699
Hadleigh town centre	172	856
Core Villages	317	241
Other centres / village stores	43	138
Out of centre	1,266	-
Copdock (Ipswich – out of centre)	-	2,432
Shawlands Mill (Sudbury)	-	2,067
<b>Babergh Total</b>	<b>2,548</b>	<b>10,432</b>
<b>Mid Suffolk</b>		
Stowmarket town centre	798	2,533
Needham Market	36	177
Debenham and Eye	156	183
Other centres / village stores	181	260
Out of Centre	609	-
<b>Mid Suffolk Total</b>	<b>1,777</b>	<b>3,152</b>

The Retail and Town Centres Study suggests that the need for convenience floorspace will most likely be met through smaller format stores. It also recognises that if convenience capacity is taken up by ‘supermarket’ operators or discount retailers the amount of floorspace required to meet projected expenditure would be greater. The Study recommends that out of centre capacity be directed to town centres in the first instance, in line with the NPPF.

The NPPF requires planning authorities to allocate suitable sites to meet the scale and type of retail, leisure, commercial, office, cultural, community and residential development needed in town centres.

The Council undertook a Call for Sites in 2014 and in 2016, however no sites meeting the threshold of 0.25ha were put forward specifically for retail use.

In terms of commercial leisure capacity, the 2015 study identifies capacity for a 4 screen cinema in Babergh District. All three towns have capacity to increase their food and beverage offer, by between 2,236m<sup>2</sup> and 3,726m<sup>2</sup> gross in Babergh and between 675m<sup>2</sup> and 1126m<sup>2</sup> gross in Mid Suffolk. There is also an increasing demand for gyms and it is recommended that additional capacity could be supported in town centres, along with small scale ten pin bowling provision in the longer term.

## Consultation Questions:

- Q 42. Do you consider that any of the sites put forward as part of the Call for Sites should be allocated for retail or commercial leisure use? Please state why.**
- Q 43. Are there any other sites that should be considered for retail or commercial leisure use?**
- Q 44. If you consider allocations for retail development should come forward as mixed use, please provide details.**

## Town centres

The Retail and Town Centres Study identifies that the challenge for the main centres in both Districts will be to maintain and strengthen their market share of convenience and comparison shopping by increasing the range, quality and choice on offer. Food and drink, cultural and leisure uses are becoming increasingly important to town centres. In particular, the Town Centre and Retail Study recommends that the mix of leisure uses in Sudbury, Hadleigh and Stowmarket is strengthened.

The Planning Practice Guidance recognises the importance of having a strategic vision for town centres. Such a vision would extend beyond the remit of the Plan albeit that the plan would be instrumental in delivering the spatial elements.

The NPPF requires planning authorities to apply the sequential test<sup>56</sup> when planning for retail and town centre uses. Proposals should be located in town centres, followed by edge of centre<sup>57</sup> if no suitable town centre sites are available, with consideration only given to out of centre if no suitable town centre or edge of centre sites are available.

It is necessary to define the boundaries of town centres in planning policy as locations where retail, leisure and office uses should be directed to

and where existing retail, leisure and office uses should be protected. In accordance with the PPG, within town centres, it is also necessary to define the Primary Shopping Area<sup>58</sup> comprising Primary Shopping Frontages<sup>59</sup> and Secondary Shopping Frontages<sup>60</sup> in order that planning policies can safeguard an appropriate mix of retail and other uses within these designations. The Retail and Town Centres Study contains recommendations in relation to the extent of Primary Shopping Frontages and Secondary Shopping Frontages in Stowmarket, Sudbury and Hadleigh. It is recommended that the town centre boundaries be extended in places to ensure that the Primary and Secondary Shopping Frontages are all within the boundary. The Primary Shopping Areas are based upon the existing Principal Shopping Areas but revised where appropriate to reflect the recommended Primary and Secondary Shopping Frontages. These potential amendments are shown on –the plans in Appendix 1. The amendments reflect the recommendations of the Retail and Town Centres Study in most instances.

Eye and Needham Market currently have Principal Shopping Area boundaries. It is proposed to retain these and amend the definition to ‘District Centre’ to reflect the NPPF requirement to define the network and hierarchy of centres. This reflects the function of these centres in relation to the role of the larger towns. Within District Centres it is proposed that existing retail uses (A1-A5) would be maintained and new ones, in line with identified capacity, would be supported. Whilst not defined as a market town or urban area, Debenham is also identified as a District Centre and it is proposed also that the existing Principal Shopping Area be referred to as the District Centre.

In order to maintain retail as the main use within the Primary Shopping Frontage whilst providing scope for other town centre uses to be accommodated, the Town Centres and Retail Study recommends that A1<sup>61</sup> uses should be maintained at a minimum threshold of 75%-

<sup>56</sup> See Glossary

<sup>57</sup> See Glossary

<sup>58</sup> See Glossary

<sup>59</sup> See Glossary

<sup>60</sup> See Glossary

<sup>61</sup> See Use Classes in Glossary

80% in Sudbury, 65-70% in Stowmarket and 60% in Hadleigh, as a percentage of ground floor frontage. For Secondary Shopping Frontages a more flexible criteria-based approach is recommended within which a mix of A1-A5, D1 and D2 uses will be permitted.

Retail developments outside of town centres can have an impact on the shops operating in a town centre. The NPPF requires an impact assessment to be undertaken in relation to retail proposals outside of a town centre. This enables the Councils to consider whether a proposal would have an impact on existing town centres. The NPPF sets a default threshold of 2,500sqm, but the Retail and Town Centres Study recommends a threshold of 400m<sup>2</sup> gross based upon the size and nature of existing shops. It is intended that the sequential test would be applied as per policy set out in the NPPF and the PPG.

In relation to Stowmarket, the Retail and Town Centres Study recommends that the regeneration of Ipswich Street and the Station Quarter (current allocations in the Stowmarket Area Action Plan) continue to be promoted. The Station Quarter is located adjacent to, but just outside, the town centre and it may be appropriate to extend the Town Centre boundary to incorporate the allocation.

Policy SD06 of the 2006 Babergh Local Plan allocates land in Sudbury around Hamilton Road for mixed-use development featuring retail, leisure or other commercial, including some residential, uses. The Council is currently considering detailed options for redevelopment of the site and it is therefore proposed that an allocation for regeneration of the area be carried over into the new Plan based upon up to date conclusions on feasibility, viability and deliverability. This could accommodate some of the identified retail and commercial leisure capacity.

## Options

### Out of Centre

#### **Option OC1 – Restrict out of centre retail development**

In line with the NPPF, restrict further out of centre and edge of centre retail development and seek to accommodate the out of centre capacity within the town centres; or

#### **Option OC2 – Support out of centre retail development to meet capacity requirements**

Include provision to increase the retail offer at existing out of centre locations in accordance with the identified capacity.

### Town Centres, Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontages

#### **Option TC1 – Town Centres and Primary Shopping Areas**

Revise (or introduce where not in place in adopted plans) the Town Centre boundaries, Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontages. Within Town Centres support will be given to A1-A5, D1-D2, B1 uses, culture and community uses and residential development in principle, where appropriate to the scale and function of the town. Within Primary Shopping Areas proposals for A1-A5 uses will be supported (in line with the frontages policy below); and

#### **Option PS1 – Primary and Secondary Shopping Frontages**

In the Primary Shopping Frontages set the thresholds for A1 uses at a ground floor level at a minimum of 80% for Sudbury, 70% for Stowmarket and 60% for Hadleigh. For the Secondary Shopping Frontages, include a criteria based policy which supports uses A1-A5, D1 and D2.

Options TC1 and PS1 reflect the conclusions of the Town Centres and Retail Study and the NPPF and therefore the Councils do not consider it appropriate to put forward alternatives.

### **Impact assessment threshold**

#### **Option RIA1 – Impact assessment threshold as per NPPF**

To rely on NPPF threshold of 2,500m<sup>2</sup> gross floorspace

#### **Option RIA 2 - Impact assessment threshold**

Set the threshold for requiring an assessment of town centre impact from edge of centre or out of centre retail proposals at 400m<sup>2</sup> gross floorspace.

### **Consultation Questions:**

**Q 45. Do you agree with the proposed Town Centre boundaries, Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontages? If not, please explain why.**

**Q 46. Do you agree with the approach to not define Primary Shopping Area boundaries within settlements other than the three main towns? If not, please explain why.**

**Q 47. Do you agree with the approach to maintain and increase retail provision within the District Centres? If not, please explain why.**

**Q 48. Do you agree with the proposed thresholds relating to the mix of uses within Primary Shopping Frontage? If not, please explain why.**

**Q 49. Do you agree with the proposal to require an impact assessment for all edge of centre and out of centre retail proposals that are 400sqm gross floorspace or more? If not, please explain why.**

### **Initial preference**

The Councils' initial preference is to restrict out of centre retail development in order to support and strengthen the role of the Districts' town centres, and therefore propose to follow the approach set out under Option OC1.

The Councils' initial preference is to adopt the approach set out in options TC1, PS1 and RIA2 as this reflects the recommendations contained in the Town Centres and Retail Study.

### **Local centres and villages**

Local centres within towns serve an important role in the provision of shops and services serving the everyday needs of the immediate surrounding residential areas. In villages, local shops can form a focal point for the community as well as serving everyday shopping needs. The NPPF states that local planning authorities should plan positively for local shops and ensure that established shops are retained.

Debenham, unlike other proposed Core Villages, currently has a defined Principal Shopping Area. It has a similar range of retail provision to other settlements which are proposed to be defined as Core Villages. However, the Retail and Town Centres Study does identify capacity for Debenham (along with Eye) and it is therefore proposed that the boundary be re-defined as District Centre and the approach to District Centres explained above would apply.

The Lavenham Neighbourhood Plan (2016) defines a Core Retail Area as the focus for retail uses, and this approach may be appropriate to take forward through Neighbourhood Plans in other villages.

### **Consultation Questions:**

**Q 50. The Councils propose to protect A1-A5 uses in Core Villages and Hinterland Villages, and in local centres within towns. Do you consider this to be the correct approach?**

# Biodiversity

## Strategic Priorities

Paragraph 156 of the NPPF requires the Local Plan to set out strategic priorities in relation to conservation and enhancement of the natural environment.

## Key Evidence

- Suffolk's Nature Strategy
- Emerging HRA Recreational Disturbance, Avoidance and Mitigation Strategy (2017)

## Introduction and context

The natural environment of Babergh and Mid Suffolk supports a rich and diverse variety of habitats which support a valuable biodiversity. The Councils' have set an objective to protect and enhance environmental assets, which includes biodiversity.

Biodiversity is defined as: '...the variety of plant and animal life in the world or in a particular habitat, a high level of which is usually considered to be important and desirable: the existence of many different kinds of plants and animals in an environment' (Oxford Dictionary).

A variety of habitats are dispersed across the two Districts. Particularly important habitats are located along the estuaries and the river valleys. The importance of these habitats is recognised through a number of designations which include international (Special Protection Areas<sup>62</sup> and Special Areas of Conservation<sup>63</sup>), national (Sites of Special Scientific Interest<sup>64</sup>) and local areas of importance (County Wildlife Sites<sup>65</sup>). These sites can vary in size from expansive areas such as the Rivers Stour and Orwell estuaries in Babergh to small sites such as Weston Fen in Mid Suffolk.

The level of protection to be afforded to Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) is set out in the Habitats Directive<sup>66</sup>. To summarise, proposals that would result in significant effects on these sites should

be refused, unless mitigation measures can be applied. Only in exceptional circumstances where there are 'imperative reasons of overriding public interest' would development that causes harm to an SPA or SAC be permitted.

Sites of Special Scientific Interest (SSSIs) are protected through the Wildlife and Countryside Act 1981 (as amended). The NPPF states that development on land within or outside of an SSSI likely to have an adverse effect on an SSSI should not normally be permitted. An exception should only be made where the benefits of development clearly outweigh the impacts.

Priority species and habitats are identified by the UK post-2010 Biodiversity Framework.

At the local level, designations in Babergh and Mid Suffolk comprise County Wildlife Sites and County Geodiversity Sites/Regionally Important Geological and Geomorphological Sites<sup>67</sup>.

Habitats are healthiest where they are well connected to each other. To protect and enhance these networks, national planning policy advises that biodiversity should be conserved and enhanced at a landscape-scale.

In recognition of the sensitivity of the internationally protected estuaries in Babergh, the Habitats Regulations Assessment relating to the adopted Core Strategy identified the potential for significant effects arising from increased recreational disturbance related to new housing development.

Babergh, Ipswich and Suffolk Coastal Councils are taking a joined-up approach to mitigating these impacts and are currently producing a Recreational Disturbance Avoidance and Mitigation Strategy which will identify and cost the measures necessary to mitigate recreational impacts and confirm how they will be funded. The intention of the strategy is to identify, enhance and protect networks of interconnected

62 See Glossary

63 See Glossary

64 See Glossary

65 See Glossary

66 Directive 92/43/EEC 58

67 See Glossary



habitats to benefit biodiversity in the long term. The Babergh Green Infrastructure Strategy (2012) identifies potential wildlife corridors (river and green corridors) that would benefit from enhancement. Suffolk Nature Strategy identifies a large area of Babergh and the south of Mid Suffolk as 'South Suffolk ancient woodland clusters' which is one of the areas of principal importance for landscape-scale conservation in Suffolk, along with the two AONBs.

As referred to above, protection for internationally and nationally protected sites is established in legislation. In producing the Plan consideration can be given to the level of protection to afford to local sites of biodiversity and geodiversity value including County Wildlife Sites, County Geodiversity Sites and priority habitats and species.

## Options

### **Option BIO 1 – Protection of designations, habitats and species**

Protect designated sites/areas, protected species, priority habitats and species and local sites. All development to provide appropriate protection to protected habitats and species.

### **Option BIO 2 – Protection and enhancement of designations, habitats and species**

Protect designated sites / areas, protected species and priority habitats and species and local sites, whilst also seeking a collective inter authority approach to enhancement. All development to provide appropriate protection as per Option 1, and to also seek enhancements for the network of habitats and biodiversity where appropriate.

## Initial Preference

The Councils' initial preference is BIO 2 – Protection and enhancement of statutory designations, habits and species which would ensure biodiversity is supported and enhanced across all parts of the Districts.

### **Consultation Questions:**

**Q 51. Do you have views on the Option BIO 1 and / or BIO 2?**

# Climate Change

## Strategic Priorities

Paragraph 156 of the NPPF requires the Local Plan to set out strategic priorities in relation to climate change mitigation and adaptation.

## Key Evidence

- Babergh DC Strategic Flood Risk Assessment (May 2009)
- Mid Suffolk District Council Strategic Flood Risk Assessment (March 2008)
- The Stour & Orwell Estuaries Management Strategy 2015 – 2020 (draft May 2016)
- Essex and South Suffolk Shoreline Management Plan 2 (October 2010)

## Introduction and context

Supporting the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change is a national core planning principle which should underpin both plan-making and decision-taking (NPPF, Para. 17). Addressing climate change and flooding relates to a number of the Councils' objectives – particularly around business growth and productivity and ensuring that communities are healthy.

Temperatures in the UK have risen by about one degree since the 1970s and, given the levels of greenhouse gas already in the atmosphere, further warming is inevitable<sup>68</sup>. The UK Climate Change Risk Assessment identifies flood risk, and particularly flooding from heavy downpours, as one of the key climate threats for the UK, alongside stresses on water resources, threats to biodiversity and natural habitats, and the repercussions for the UK from climate change impacts abroad.

With a number of rivers, tributaries and the Stour and Orwell estuaries, Mid Suffolk and Babergh is potentially vulnerable to the effects climate change from flooding, however areas at risk of flooding are limited. There are a number of areas

at risk of localised flooding from watercourses and within Babergh there are identified areas at risk of coastal erosion currently present along the Orwell and Stour estuaries, in the south-west of the district. In particular the mouth of the Stour is exposed to incoming north-easterly waves causing erosion specifically at the Shotley frontage.

The planning system can help to mitigate climate change by limiting increases in greenhouse gas emissions through supporting renewable energy development, locating development in areas which reduce the need to travel and encouraging greater use of sustainable transport measures. The planning system can also help with adaptation to climate change through encouraging measures to improve the sustainability and design of buildings and infrastructure.

## Flood risk

Local planning authorities are required to '... adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations' (NPPF, para. 94).

National policy stipulates that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. 'When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.' (NPPF para 99).

'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice

<sup>68</sup> UK Climate Change Risk Assessment: Government Report (DEFRA, 2012)

from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, (NPPF, para 100).

Whilst neither of the districts have major flood risk areas there is a small section of estuary which is threatened by coastal erosion on the Shotley Peninsular and there are areas across both districts which suffer from localised flooding. Localised flooding is mainly a result of surface water flooding which has potential to be addressed through measures to improve drainage channels.

## Coastal change

The Essex and South Suffolk Shoreline Management Plan 2 identifies an area in Babergh within which development should be restricted due to pressure from coastal erosion. This relates to the eastern section of Babergh known as the Shotley Peninsula, along the estuary.

## Renewable energy and sustainable construction

The NPPF states that the planning system should 'support the transition to a low carbon future in a changing climate...and encourage the use of renewable resources (for example, by the development of renewable energy)' (Para 17); Renewable energy schemes include

- generation from energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels). Renewable energy generation can be either decentralised

(i.e. not connected to the National Grid but to serve one building, a group of buildings or a community) or can be connected to the National Grid to contribute towards national energy production.

## Sustainable construction

National policy proposes that '...to support the move to a low carbon future, local planning authorities should:

- ....actively support energy efficiency improvements to existing buildings; and
- when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards.'

Whilst the planning system has a role to play in delivering sustainability in buildings, construction methods and the energy performance of buildings are primarily addressed via Building Regulations. Nevertheless, the March 2015 Ministerial Statement<sup>69</sup> enables local planning authorities to require energy efficiency standards that exceed Building Regulations provided these do not exceed the requirements of the level 4 of the former Code for Sustainable Homes. This equates to around a 20% improvement in CO<sub>2</sub> emissions performance above the Target Emission Rate of the 2013 Edition of the 2010 Building Regulations.

Other technical standards to improve sustainability were introduced by the Government in October 2015 through the introduction of optional Building Regulation standards. Examples include requiring improvements to water efficiency on new dwellings to achieve efficiency of 110 litres/person/day (compared to 125 litres/person/day under Building Regulations). Similarly improvements in energy efficiency for all development to achieve a 20% reduction in CO<sub>2</sub> emissions below the Target Emission Rate of the current Building Regulations standards can be sought. Other examples of optional

69 <https://www.gov.uk/government/speeches/planning-update-march-2015>

standards include BREEAM (the British Research Establishment Environmental Assessment Method)<sup>70</sup> which can be used to assess the environmental performance of new and existing non-residential buildings and refurbished residential buildings and also Building for Life<sup>71</sup> for residential buildings which is a government-endorsed industry standard for well-designed homes and neighbourhoods.

## **Options**

### **Flood Risk**

#### **Option FR1 - Flood Risk – Leave to NPPF to provide policy framework**

Provisions for management of flood risk are detailed in the NPPF. Due to the low levels of susceptibility of flooding in the District, with the exception of localised flooding which can be mitigated the strategy is based upon avoidance.

### **Renewable Energy**

#### **Option RE1 - Renewable Energy – Leave to NPPF to provide policy framework**

The NPPF requires local planning authorities to approve applications for renewable energy if the impacts are (or can be made) acceptable.

#### **Option RE2 - Renewable Energy policy**

To supplement national policy under this option the Council would develop a local plan policy which will support the delivery of such technologies but will include criteria related to specific impacts including landscape. The policy approach will need to be robust to enable assessment of effects and have scope in the future to consider emerging technologies which may be in use over the next 10 years and beyond.

### **Sustainability standards**

#### **Option BS1 - Building Sustainability – Include sustainability standards**

Under this option proposals for residential use would be required to meet the optional standard for water efficiency of 110 litres/person/day and/or improved energy efficiency standards.

No alternative options are presented as if this option is not progressed the 'baseline' Building Regulations requirements would be applied.

<sup>70</sup> See Glossary

<sup>71</sup> See Glossary

## Initial Preference

The Councils' initial preference is to include a policy related to renewable energy which will enable proposals to be considered in relation to locally specific criteria, as per Option RE2.

The Councils' initial preference in relation to sustainability standards is to require that new residential developments meet the optional standard of 110 litres/person/day in relation to water usage given the water scarcity in the area, as per Option BS1. Anglian Water have identified East Anglia as an area of 'severe water stress' and the Anglian Water Resources Management Plan (2015) identifies lowering demand as one way in which this can be addressed. The implications of applying these standards will be considered through viability testing as the production of the Joint Local Plan moves forward.

### Consultation Questions:

- Q 52. How should the local plan consider the impact of renewable technologies? What types of effects should be assessed within the policy criteria?**
- Q 53. Do you support the Council's initial preference to include water efficiency measures in new build? If no, please explain why?**
- Q 54. Are there any other additional environmental standards Babergh and Mid Suffolk should be requiring? If so, please provide details and reasons why.**

# Landscape, Heritage & Design

## Strategic Priorities

Paragraph 156 of the NPPF requires the Local Plan to set out strategic priorities in relation to conservation of the historic environment, including landscape.

## Key Evidence

- Dedham Vale AONB and Stour Valley Management Plan 2010 - 2015
- Suffolk Coast and Heaths AONB Management Plan – 2013 – 2018
- The Suffolk Landscape Character Assessment (SCC, 2011)
- The Suffolk Historic Landscape Characterisation (SCC, version 3 2008)
- The Joint Babergh and Mid Suffolk District Council Landscape Guidance (2015)
- Heritage Settlement and Landscape Sensitivity Assessment (underway)

## Introduction and context

The landscape and the historic environment have a strong inter-relationship, as the character of the landscape is influenced by historic assets and their settings, as well as traditional villages and historic townscapes. Equally, the landscape can be important to the setting of a historic asset.

## Landscape

Babergh and Mid Suffolk have a diverse landscape character, with parts of Babergh lying within Dedham Vale and River Stour Area of Outstanding Natural Beauty (AONB) and the Suffolk Coast and Heaths AONB. Adjoining the Dedham Vale Area of Outstanding Natural Beauty is an area defined as the Stour Valley Project extending beyond Sudbury and into West Suffolk, however this area does not benefit from the same protection as an AONB.

The National Planning Policy Framework (NPPF) gives significant protection to these designated landscapes. Other areas of landscape which are not designated are also attractive and important

and increased pressure from development has the potential to harm the quality of local landscapes. Protecting and enhancing the landscape is a key objective for the Plan.

Special Landscape Areas (SLAs) and Areas of Visual and/or Recreational Amenity (AVRA) and Visually Important Open Spaces (VIOS) are local landscape designations which are identified in the adopted plans of both Districts. Areas of Visual and/or Recreational Amenity (AVRA) and Visually Important Open Spaces (VIOS) were introduced in the 1990s in Babergh and Mid Suffolk respectively to protect identified open spaces in and around village settlements. The types of areas designated as AVRA or VIOS vary from recreational open spaces within settlements to spaces without public access but which provide views into the open countryside. Open spaces of value in terms of public access are considered in the Healthy Communities section of this document.

The approach toward landscape protection has evolved since the current Local plan policies were put into place. Current practices re-evaluate landscape characteristics as a whole rather than identifying small pockets of deemed significance. Identifying the essential defining characteristics of each landscape and the settlements provides guidance for development in the countryside, by ensuring they not only fit in with their surroundings, but also help to retain and enhance the distinctive character of the area.

The Joint Babergh and Mid Suffolk District Council Landscape Guidance (2015) identified 16 different landscape character areas across the Districts and the key features and sensitivities which define them. As a predominantly working landscape, with arable and pastoral land use giving an underlying rural character, the influences of changing agricultural practices have helped change the look of the two districts over time.

In contrast to Mid Suffolk, Babergh has a distinctive undulating landscape with pockets of landscape character areas which are unique to the County. In particular the Shotley Peninsula area is identified as Ancient Estate Farmlands with rich loamy soil resulting in early cultivation shaping the layout of the land. Stutton rests within Plateau Estate Farmland representing features of an early 20th century landscape park and enclosed fields bounded by a straight hedge-line.

The historic setting of many settlements in the Districts is an important consideration when considering proposals for development. In order to better understand the sensitivities of settlements to development in terms of their historic landscape setting, the Councils have commissioned a Heritage Settlement and Landscape Sensitivity Assessment. The assessment comprises a sensitivity analysis of the historic characteristics of the landscape and settlements and will identify areas where development could enhance an area; have a neutral affect or where development could cause harm to vulnerable / irreplaceable areas.

## Options

### **Option L1 – Maintain local landscape designations**

Under this option Special Landscape Areas, Visually Important Open Spaces and Areas of Visual and Recreational Amenity would be retained and within these areas development would be required to maintain or enhance the special landscape qualities; or

### **Option L2 – Remove local landscape designations and apply a criteria based policy**

Under this option, all development would be expected to minimise impacts on the landscape and to enhance landscape character wherever possible, by reference to the Joint Babergh and Mid Suffolk Landscape Guidance.

## Initial Preference

In relation to landscape, the Councils' initial preference is Option L2 which provides the greatest potential to protect and enhance the landscape through decision making across the Districts.

## Heritage Assets

There are numerous designated heritage assets across Babergh and Mid Suffolk, including Conservation Areas, Scheduled Monuments, Registered Parks and Gardens and thousands of Listed Buildings.

The National Planning Policy Framework distinguishes between the policy approach towards designated heritage assets and non-designated heritage assets. The approach to decision taking in the NPPF focuses around assessing the significance of the heritage asset. The weight attached to the protection of designated heritage assets should depend upon the importance of the asset, but needs to be considered in relation to whether an alternative, viable use can be found, whether funding is available to protect the asset and whether the public benefit of the proposed use would outweigh the harm or loss. For non-designated assets a balanced judgement should be made.

Non-designated assets are not defined in the NPPF but are considered to include those identified on a 'Local List'. Historic England identifies the Local list as '*an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment*'. The term non-designated heritage assets covers a range of features that make a contribution towards the historic environment. As well as buildings, these could include other built features, gardens, greens, commons and ties which are often outside of Conservation Areas. Presently, Local Lists have only been produced for Sudbury and Nayland. The East Bergholt Neighbourhood Plan makes reference to work progressing on a Village Local List.

## Options

### Option HA1 – Protection of non-designated heritage assets

Include a policy which identifies the types of assets which would be considered as non-designated heritage assets, such as identified buildings, features, gardens, greens, commons and trees. A policy approach consistent with the weight afforded to non-designated assets in the NPPF would be applied.

It is not appropriate to consider alternatives as the NPPF provides detailed policy in relation to designated heritage assets, and defines the designations which are included.

## Initial Preference

The Councils' initial preference is to follow Option HA1 and to include a policy which identifies the types of assets that would be considered for a local list. This will provide a consistent approach for local lists to be prepared across Babergh and Mid Suffolk.

### Consultation Questions:

- Q 55. Are there any other approaches that the Joint Local Plan could take to protect the landscape?**
- Q 56. Should additional protection be given to areas which form part of a landscape project area but which aren't designated?**
- Q 57. How can the Joint Local Plan make the most of the heritage assets?**
- Q 58. What level of protection should be given to identified non-designated assets? Are there any specific situations in which the balance should favour or not favour protection of identified non-designated assets?**
- Q 59. Should a more flexible approach toward climate change objectives be adopted where this would assist in protecting a heritage asset?**

## Design

The National Planning Policy Framework states that 'good design is indivisible from good planning, and should contribute positively to making places better for people.'

Design is commonly thought of as the appearance of a building or development, but in fact design also relates to how buildings and developments are used, how sustainable they are and how they relate functionally to the wider area. Some of these wider elements of design are covered in other parts of this document, for example in relation to the mix and type of homes, climate change and provision of open spaces, and options have been presented where appropriate.

The Suffolk Design Guide for Residential Areas (2000) sets out detailed guidance in relation to design, for example in relation to materials and colour.

The Councils' current plans contain policies which seek to secure high quality design. It is proposed that this policy approach is maintained and that new development:

- Responds to and safeguards the existing character/context;
- Creates its own character and interest;
- Incorporates good practice in urban design (for example through active frontages and connectivity);
- Promotes health and well-being, and protects amenity;
- Safeguards highway safety and provides suitable access; and
- Incorporates efficient use of natural resources and sustainable drainage.

### Consultation Questions:

- Q 60. Is there any aspect of design that priority should be given to?**
- Q 61. Is there any aspect of design that should be introduced to the Councils' policies?**
- Q 62. Is there an area of design related to past development that you consider needs to be addressed in future development?**



# Infrastructure

## Strategic Priorities

Paragraph 156 of the NPPF requires the Local Plan to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

...the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);  
...the provision of health, security, community and cultural infrastructure and other local facilities.

## Key Evidence

- Babergh District Council Infrastructure Delivery Plan (IDP) – Feb 2013
- Mid Suffolk District Council Infrastructure Delivery Plan (IDP) – Apr 2014

## Introduction and Context

It is important to consider all infrastructure and transport needs when planning for new development and growth.

The Councils fully appreciate that the delivery of new homes and jobs needs to be supported by necessary infrastructure, including a wide range of transport options, utilities, and community facilities. This issue is of particular concern to existing residents and businesses. Indeed, enabling the provision of the necessary infrastructure to support residents, businesses, communities, the environment and individuals and prioritising investment into strategic services and infrastructure are key objectives of the Councils.

The Councils will prepare an Infrastructure Delivery Plan (IDP)<sup>72</sup> based on work carried out for the current Local Plan: relevant Neighbourhood Plans; topic based studies; and discussions with infrastructure providers. The IDP will sit alongside the Plan and provide

specifics on the main items of infrastructure, when they are likely to be provided and who will pay for them.

Additionally, the delivery and place policies in this plan will highlight essential infrastructure for communities within Babergh and Mid Suffolk. The broad categories of infrastructure covered in the IDP will include:

- Education – early years and childcare, primary, secondary, further education, and higher education
- Health – hospitals, health centres, GP surgeries, dentists, public health, and preventative health care
- Transport – highways, cycle and pedestrian facilities, rail, bus, travel management, and car parking
- Water and Drainage – water supply, waste water, flood risk management and resilience, and water quality
- Energy – electricity, gas, and renewable energy.
- Communications – broadband coverage and provision
- Leisure and green infrastructure – sport, open space and community facilities

Informed through ongoing discussions with communities and infrastructure providers; the New Anglia Local Enterprise Partnership; education, health and transport provision have been identified as priority areas for the future necessary to support the area's growth and development.

Infrastructure and community facilities are mainly provided by partner agencies and service providers such as water and energy provision by the utility companies; highways and social services by Suffolk County Council; education by a range of public and private sector providers, and healthcare services and facilities by the NHS West Suffolk Commissioning Group and Ipswich and East Suffolk Clinical Commissioning Group and National Health Service (NHS) England. The IDP will identify the different investment and

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development time scales for these providers and will work with those providers to help deliver a co-ordinated approach to new infrastructure delivery.

New development must provide for the educational needs of new residents. The NPPF (paragraph 72) sets out that great importance should be placed on the need to provide new school places. It also states that local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, giving great weight to the need to create, expand or alter schools. This will involve the expansion of existing schools where feasible and identification of opportunities to create new schools. Education requirements will need to be based on a strong understanding of future pupil numbers, with co-operation between county and district councils. A range of educational opportunities will need to be addressed as part of a sustainable strategy, including practical vocational training and apprenticeships.

The authorities will need to work with the NHS and local health partnerships to ensure adequate provision of healthcare facilities to support new and growing communities. This will be particularly important given the ageing profile of existing and future residents.

In a largely rural area accessibility is an ongoing issue. There is a need for this to be addressed both through the provision and retention of services and facilities and through improving transportation options, including encouragement of sustainable transport modes.

Development must be supported by provision of infrastructure, services and facilities that are identified to serve the needs arising from new development. Key infrastructure projects being pursued within and around Babergh and Mid Suffolk include:

- The Ipswich Northern Route Project;
- The Sudbury Western Relief Road Project;

- A12 and A14 road improvements
- Rail network upgrades
- Flood management and alleviation
- Waste water treatment upgrade at Sudbury
- Upgraded household waste recycling provision
- Better Broadband for Suffolk
- School places in the form of expanded or new primary and secondary schools– location to be determined;
- Healthcare infrastructure is provided as part of new developments of appropriate scale in the form of expanded and or expanded or new dental surgeries.

The Council also has a Community Infrastructure Levy in place. This means that some types of new development must make a payment which will be used to fund infrastructure required to support development in the District. The amount of levy payable depends upon the size, type and location of the new development. However, CIL cannot be the single source of funding for infrastructure. From initial work on the IDP education, health and transport are identified as being key infrastructure issues for the District for which a strategic delivery solution may be required.

In the event that essential infrastructure cannot be appropriately delivered to support new development, policy will be used to restrict development from being commenced or, in certain cases, from being permitted, in the absence of proven infrastructure capacity. In cases where the cumulative impact of schemes on strategic infrastructure could prevent schemes being developed a coordinated approach will be used to pull resources to address requirements; where this cannot be achieved the policy of restriction shall apply.

A draft policy to manage infrastructure provision is set out below:

## Managing Infrastructure Provision

All new development should be supported by, and have good access to, all necessary infrastructure. Planning Permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development.

Development proposals must consider all of the infrastructure implications of a scheme including existing commitments to infrastructure provision and cumulative impacts if the proposal forms one of a number of growth projects in a locality; not just those on the site or its immediate vicinity.

Conditions or planning obligations<sup>73</sup>, as part of a package or combination of infrastructure delivery measures, are likely to be required for many proposals to ensure that new development meets this principle. Consideration must be given to the likely timing of infrastructure provision. As such, development may need to be phased either spatially or in time to ensure the provision of infrastructure in a timely manner. Conditions or a planning obligation may be used to secure this phasing arrangement.

A draft policy is similarly drafted to address education provision as follows:

***Development must be supported by provision of infrastructure, services and facilities that are identified to serve the needs arising from new development.***

## New Education Provision

Sites proposed, or in current educational use, will be protected for that use. The change of use, or re-development of educational establishments and their grounds, will not be permitted unless:

- It can be clearly demonstrated that the use of the site is genuinely redundant and no other alternative educational, or community use can be found; and
- Satisfactory alternative and improved facilities will be provided; and
- The area of the site to be redeveloped is genuinely in excess of Government guidelines for playing field provision, taking into account future educational projections.

The Councils will respond positively to and support appropriate and well-designed applications regarding the creation of new school and education facilities. As expressed in the NPPF, the Council will use a presumption in favour of the development of schools and educational uses. The Council will engage in pre-application discussions with promoters to develop a collaborative approach to suitable applications. Where necessary, the Council will utilise planning obligations to help to mitigate any adverse impacts of an educational development and assist in delivering development that has a positive impact on the community.

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## Options

Infrastructure provision is essential. The options are largely the mechanisms for enabling delivery.

### **Option INF 1 - Leave to NPPF to provide the policy framework.**

The NPPF provides a general requirement for Local Plans to plan positively for the development and infrastructure required in the plan area.

### **Option INF 2 – To have a strategic infrastructure policy to manage infrastructure provision in the locality to supplement the NPPF addressing issues of cumulative growth and education provision.**

In respect of policy on education, a strong permissive steer is to support new academies and free schools in the NPPF, therefore an alternative option is to have a local policy which provides further guidance to inform proposals and seek appropriate mitigation if required.

## Initial Preference

The Council's initial preference is to follow the approach set out in **INF 2 to have a strategic infrastructure policy to manage infrastructure provision**, as this will enable infrastructure provision to be secured and contributions to be directed towards achieving the most effective outcomes.

### **Consultation Questions:**

- Q 63. Which option do you consider most appropriate? Please explain why?**
- Q 64. What do you consider the key infrastructure issues in your community?**
- Q 65. What infrastructure issues do you consider to be a priority for the future?**
- Q 66. What infrastructure do you think would be needed to support the growth scenarios?**
- Q 67. What comments do you have on the proposed strategic approach to infrastructure delivery?**
- Q 68. Should a separate policy be developed to manage provision of education and healthcare?**

# Healthy Communities

## Strategic Priorities

Paragraph 156 of the NPPF states that strategic priorities should include the provision of health, security, community and cultural infrastructure and other local facilities.

## Evidence

- Playing Pitch Audit (underway)
- Built Sports Facilities Audit (underway)
- Open Spaces Assessment (underway)

## Introduction and Context

The National Planning Policy Framework (NPPF) states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.

The factors that influence health include the social and economic environment and the physical environment as well as a person's individual characteristics and behaviours<sup>74</sup>. The Marmot Review<sup>75</sup> highlighted that *'People's health is affected by the nature of their physical environment; living in poor housing, in a deprived neighbourhood with a lack of access to green spaces impacts negatively on physical and mental health.'*

The population of Babergh and Mid Suffolk have a relatively long life expectancy at about 81 years for males and about 84 years for females<sup>76</sup> compared to the England and Wales average of 79.4 years for males and 83.11 years for females (UK National Statistics, Life expectancy 2011-2013, years).

However the population is aging and as such, there will be additional and/or different demands on services and facilities, in particular housing and medical care. Both Districts have an aging population and a significant percentage of the population are aged 65 years or older (21% in Babergh and 20.13% in Mid Suffolk<sup>77</sup>). The number of older people is predicted to substantially increase over the Joint Local Plan period. These issues are also considered in the

Housing Type and Affordable Housing section of this document.

## Deprivation

The Government measures relative deprivation across the country through the Indices of Deprivation which cover income; employment; education, skills and training; health and disability; crime; housing and living environment. Relative deprivation levels in Suffolk worsened between 2007 and 2010 and have continued to decline between 2010 and 2015<sup>78</sup>. In Babergh and Mid Suffolk, the Indices of Multiple Deprivation show a varying picture but with most parts of the Districts being towards the centre of the scale (i.e. not identified as being within the least or most deprived).

Whilst, the urban parts of the Districts are shown to overall experience greater issues around deprivation, across Suffolk a significant number (28%) of income deprived people live in rural areas. For the population living in a rural setting the 2016 Hidden Needs Report states that it costs approximately 25% more to reach the same living standards as someone in an urban setting. The rural parts of the Districts are also notably identified as being some of the worst deprived areas in terms of access to housing and services.

The Indices of Deprivation<sup>79</sup> (2015) identify the population of Babergh and Mid Suffolk as, generally, not experiencing issues of deprivation relating to health. There are however distinct areas within the Districts where the population is identified as being more deprived in terms of health, particularly within Sudbury and Stowmarket. In relation to the living environment (where deprivation is measured in respect of the quality of housing, air quality and road safety), there is a broad spectrum across both Districts with some areas being within the 'most deprived' and some being within the 'least deprived', with the urban areas being notably less deprived than rural areas.

<sup>74</sup> World Health Organisation

<sup>75</sup> Marmot Review – Fair Society, Healthy Lives (2010)

<sup>76</sup> Suffolk Observatory 2013

<sup>77</sup> Census 2011, KS102EW, Age Structure

<sup>78</sup> Hidden Needs in Suffolk Five Years On (University of Suffolk, 2016)

<sup>79</sup> See Glossary

The extent to which the Plan has an influence on addressing deprivation is intrinsic to a number of the options put forward through this consultation, for example spatial distribution and the approach to rural growth.

## **Green infrastructure, open spaces, sports and recreation**

The NPPF recognises the importance of high quality open spaces and access to sports and recreation facilities to the health and wellbeing of communities, and promotes the creation and protection of networks of green infrastructure<sup>80</sup>. The Suffolk Joint Health and Wellbeing Strategy<sup>81</sup> identifies access to green spaces as important in encouraging healthier lifestyles.

In terms of taking this forward through the Plan, the NPPF requires planning policies to be based upon up to date assessments of the quantitative and qualitative need for open space, sports and recreation facilities.

The Councils are currently producing an overarching Leisure, Sports and Physical Activity Strategy which will set out priorities and objectives for the two Districts. The Leisure Facilities Strategy is being produced alongside this and will set out the Councils' priorities for investment in its built facilities. The Councils are also undertaking an assessment of needs for playing pitches and built sports facilities through the production of a Playing Pitch Strategy and Built Sports Facilities Strategy, and an assessment of open spaces (both quantity and quality) is also currently being undertaken.

In Babergh and Mid Suffolk, previous studies have identified deficiencies in open space provision, including deficiencies in Neighbourhood Equipped Areas for Play (NEAP) and Local Equipped Areas for Play (LEAP), outdoor sports provision and allotments (Green Infrastructure Framework for Babergh District,

2012 and Draft Mid Suffolk Green Infrastructure Assessment, 2014).

In relation to strategic scale green infrastructure, a strategy was produced for the Haven Gateway area in 2008 which identified strategic scale needs and opportunities. This was updated in 2015<sup>82</sup> and concluded that, against the recognised Accessible Natural Greenspace Standards, there are areas of deficiency in and around Claydon / Great Blakenham, Needham Market, Hadleigh and Capel St Mary.

Local Green Space<sup>83</sup> designation enables local communities to identify and protect green spaces that are demonstrably special to the local community and have particular local significance. Where Local Green Space is designated the NPPF states that new development should be ruled out other than in very special circumstances. Local Green Spaces have been identified within the East Bergholt Neighbourhood Plan (2016) and the Mendlesham Neighbourhood Plan (2016).

Saved policies of the Babergh Local Plan (2006) currently require residential developments on sites of 1.5ha and above to provide 10% of the gross site area as public open space and residential developments of up to 1.5ha to provide open space and play equipment in proportion to the number of dwellings by either contribution or on site provision where there is an opportunity to combine with an established area of open space. In Mid Suffolk saved policies of the 1998 Local Plan require new facilities to be provided as part of new development unless adequate facilities already exist nearby.

Off-site provision of open space, sports and recreation provision will be funded through the Community Infrastructure Levy other than for identified strategic allocations.

<sup>80</sup> See Glossary

<sup>81</sup> Suffolk Joint Health and Wellbeing Strategy (Suffolk Joint Health and Wellbeing Board, 2013).

<sup>82</sup> Haven Gateway Green Infrastructure Strategy – Update for the Ipswich Policy Area (Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council and Suffolk Coastal District Council, 2015).

<sup>83</sup> See Glossary

## Options

### On site open space – residential developments

#### **Option OS1 – Set a prescriptive requirement for on-site provision**

Set a prescriptive standard for provision of on-site open space similar to that contained in the existing Babergh Local Plan, which would apply to sites of 1 hectare or more. On-site sports provision would be required as part of strategic allocations; or

#### **Option OS2 – Relate requirements to identified needs**

Require on-site provision of open space for residential development of 1 hectare or more only where this would meet an identified need that can be addressed through on-site provision. On-site sports provision, as part of strategic allocations, would also be required where needed and would be required to reflect the needs assessment; and

## Initial Preference

The Councils' initial preference is to follow the approach set out in OS2 - Relate requirements to identified needs as this will enable provision to be targeted at specific needs.

## Community Facilities

The NPPF states that planning policies and decisions should plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities, and should also guard against the unnecessary loss of valued facilities and services.

Community facilities can include uses such as local shops, community centres and village halls, public houses and places of worship. Local shops

are considered separately in the Retail and Town Centres section of this document. In rural areas such as Babergh and Mid Suffolk, such uses can form an important focal point for a village. However, they can come under pressure for change of use or redevelopment, particularly for housing.

Provision of new community facilities in relation to new development is addressed in the Infrastructure section of this document.

## Options

### On-site open space – non-residential uses

#### **Option NROS1 – Leave to NPPF to provide policy framework.**

The NPPF provides a general requirement for local plans to plan positively for development, with a requirement for planning policies and decisions to achieve places which promote ... high quality public space (NPPF, para. 69).

#### **Option NROS2 – Non-residential uses – include policy**

Require on-site open space provision as part of non-residential uses of 1 hectare or more where they relate to developments which would be regularly used by a large number of people (for example employment or retail uses).

### Protection of existing spaces

#### **Option POS 1 – Leave to NPPF to provide policy framework**

The NPPF requires open space and sport facilities to be protected unless an assessment shows it is surplus, or the equivalent or better provision would result from the development.

### **Option POS 2 – Protection of Open Spaces - include policy**

Include a policy which protects open spaces and sports facilities in line with the NPPF approach but which also recognises the local distinctiveness afforded by open spaces in Babergh and Mid Suffolk.

### **Initial preference**

The Councils' initial preference is to include a policy within the Joint Local Plan as per Option NROS2 ' - Non-residential uses - include policy' which provides certainty and consistency on policy requirements.

The Councils also have a preference to include a policy as per Option POS2 ' - Protection of open spaces - include policy' - which will enable the Councils to apply criteria around local distinctiveness in relation to the protection of open space.

## **Options**

### **Protection of Community Facilities**

#### **Option CF1 – Leave to NPPF to provide policy framework**

The NPPF contains a requirement to plan positively for the provision and use of community facilities and to guard against the loss of valued facilities and services.

#### **Option CF2 – Protection and Provision of Community Facilities**

Under this option provision of new community facilities would be supported and existing facilities would be protected against loss unless it can be demonstrated that they are surplus to requirements or that the development outweighs the loss of the facilities and alternative provision can be made elsewhere.

## **Initial Preference**

The Councils' initial preference is to include a policy in line with option CF2 in order that the circumstances under which the loss of a facility would be acceptable are clearly set out.

### **Consultation Questions:**

**Q 69. Should the strategy of the Plan be focussed on addressing deprivation?**

**Q 70. Are there any specific approaches that should be applied to address deprivation?**

**Q 71. Are there any other circumstances and / or provisions under which open space, sports facilities or community facilities should be required and / or protected?**

**Q 72. Through the Plan should any other areas of Local Green Space be identified and protected?**

**Q 73. Are there any specific facilities that should be included in the definition of community facilities?**



# Place

# Functional Clusters

## Key Evidence

- BDC Functional clusters - The Babergh Local Plan (2011 – 2031) Core Strategy and Policies (Map 4).
- The Mid Suffolk Functional Clusters Study

## Introduction and context of issue

The Babergh Local Plan (2011 – 2031) Core Strategy and Policies identified ‘functional clusters’ as part of the spatial geography of the District which form a cornerstone of the settlement hierarchy.

Clusters are based on how communities inter-connect and access and use of services and facilities.

The Districts of Babergh and Mid Suffolk comprise largely rural areas with distinctive settlement patterns of the urban areas edging Ipswich, Diss and Bury St Edmunds and the market towns and larger settlements located across the District which serves a large rural network of villages, hamlets and the wider countryside. The many small villages depend on the larger settlements as localised services and facilities to meet their daily needs. In this context the areas have an interconnected geography between settlements. This geography is formally identified in The Babergh Local Plan (2011 – 2031) Core Strategy and Policies (Map 4). The Council is proposing a minor refinement to the Babergh functional cluster designations to ensure that all parishes identify to a single functional cluster on a ‘best fit’ basis. This will improve monitoring accuracy and ensure consistency of approach across the wider Babergh and Mid Suffolk areas. The Babergh functional clusters are shown on the map in Appendix 2.

A similar mapping exercise has been undertaken for Mid Suffolk District (as set out in the Mid Suffolk Functional Clusters Study, June 2017). In Mid Suffolk, The District is a predominantly rural area with a distinctive settlement pattern,

containing one main town, a handful of large villages that serve a wide catchment, and a small number of villages on the fringe of the urban area of Ipswich. The largest town is Stowmarket, which includes the neighbouring parishes of Combs, Haughley, Onehouse and Stowupland, situated in the centre of the district. The settlement pattern beyond Stowmarket is influenced by the way in which places relate to each other and the natural day-to-day connections that are made between settlements because of the geography of an area. As a rural district, the many small villages depend on the larger settlements and town centres for many of their needs. In this context the role provided by the major centres beyond the district is also recognised, with the north of the district looking to Diss and Bury St Edmunds, and to a lesser extent Harleston. The eastern parts look to Ipswich and to a lesser extent Saxmundham, Framlingham and Woodbridge.

Following initial consultation the Council has mapped the geography of the clusters across Mid Suffolk. This information has also informed the settlement hierarchy review for the Districts. The proposed Mid Suffolk functional clusters are shown on the map in Appendix 2.

### Consultation Questions:

**Q 74. Do you consider the approach to identifying functional clusters appropriate for Babergh and Mid Suffolk? If not, please explain what would be your preferred approach?**

# Settlement Boundaries

## Introduction

Settlement boundaries are recognised and generally accepted as an essential tool for managing the location of development, as they demonstrate where the principle of development has been established. Land outside of settlement boundaries is defined as ‘the countryside’ where only certain types of development are allowed. Settlement boundaries can provide confidence to developers and the community about the location of development. It can also help prioritise investment within towns and villages whilst restricting the endless sprawl of settlements into the open countryside. However, tightly drawn settlement boundaries and restrictive policies can limit scope for growth and investment, particularly in smaller rural areas without Local Plan allocations for new development.

The settlement boundaries for Babergh were established during the 2006 Local Plan process. The majority of Mid Suffolk settlement boundaries were established during the 1998 Local Plan process, however since adoption of the 2008 Mid Suffolk Core Strategy some settlements have been re-classified as ‘countryside villages’ where settlement boundaries no longer apply. Due to their age, many settlement boundaries do not relate to the now established built-form of settlements as they have expanded over time. The new Joint Local Plan provides an opportunity to comprehensively review all settlement boundaries within the districts. Suitable flexing of rural settlement boundaries will allow for further appropriate small scale development opportunities, where historic land has now been used up. This will help to promote rural vitality and diversity of housing market opportunities across the plan area.

New ‘committed boundaries’ have been identified which demonstrate the current built-form of settlements. Committed boundaries were established using the following methodology:

- A desk top exercise using aerial photographs and the most up to date Ordnance Survey map to establish land use.
- The planning history of sites around the current settlement boundaries were reviewed. Any allocated sites and current planning permissions granted before 31st March 2017 have been included within the new settlement boundary. Any planning permissions granted after this date have not been included within the new committed boundaries.
- Some small communities (such as hamlets) have been identified and given boundaries, where there are more than 10 well-related dwellings fronting a public highway and the community has its own distinct characteristic.

The following review principles have been used to assess settlement boundaries:

- Where possible settlement boundaries should follow physical boundaries such as roads and hedges. Exceptions have been made where following a physical boundary would create an irregularity in the settlement boundary. Where development is on one side of a road, the boundary should follow a physical boundary on that side of the road.
- Employment land should be included if it adjoins a settlement.
- Edge of settlement playing fields, open spaces and churches are excluded from the settlement boundary unless effectively enclosed by development.
- Anomalies from previous settlement boundaries have been amended, including extensions to properties beyond the settlement boundary, and redrawing the existing boundary to meet the criteria set out above.

The Councils have taken the approach that Urban Areas, Market Towns and Core Villages will have new growth identified and allocated in the new Local Plan through the allocation of new housing sites. At the next consultation stage of the Joint Local Plan Hinterland Villages, Hamlets and Countryside villages will have boundary flexing to accommodate sites deemed appropriate for development. Maps identifying 'committed boundaries' and potential SHELAA sites can be viewed in Appendix 3 and 4.

### Consultation Questions:

**Q 75. Do you consider the proposed new settlement boundaries to be appropriate? (please explain your answer)**

**Q 76. Are there any other settlements that should be given new settlement boundaries? (please explain your answer)**

**Q 77. Is the threshold (10 well related dwellings) for identifying settlement boundaries appropriate?**

### Options

The options identified are set out below:

#### **Option BND1 – Review and designate boundaries for all settlements above a threshold of 10 dwellings adjacent to or fronting an existing highway**

The alternative would be to revoke settlement boundaries and rely upon new land allocations being made. However, this approach is not considered realistic, as it would likely make the Joint Local Plan too prescriptive with the loss of flexibility reducing opportunities for suitable windfall development.

### Initial preference

The Councils' initial preferred approach is BND1 where settlement boundaries will be created for every settlement of at least 10 well related dwellings adjacent to or fronting a public highway. This is favoured as it will enable consistency and certainty across all communities as to where the identified built up area is, and where the principle of development would be acceptable.

# Potential Land for Development

The Plan will identify and allocate sufficient land for development to accommodate the Districts' development need and requirements. The location of the allocations will be dependent upon the spatial distribution to development (see 'spatial distribution' section of this document) and the suitability and deliverability of development proposals.

In 2014 and 2016 the Council undertook two rounds of 'call for sites' through which landowners and developers and other interested parties were invited to submit sites which they considered were available for development.

All sites received have been assessed to consider their technical suitability for development and their potential to be allocated in the Plan. The assessments are included within the supporting evidence document, the Strategic Housing & Employment Land Availability Assessment (SHELAA).

Your views are sought on the suitability of the sites identified in this consultation. Please note many of the sites presented in this consultation will not be needed to meet the development needs of the Districts and not all will be taken forward in the Plan into allocations. The selection of allocations will be informed by consultation outcomes, evidence and appraisals.

The residential and employment sites identified in Appendix 3 and 4 of this consultation document are considered technically suitable for development and views are now being sought on whether the locations and sites are considered appropriate for development. Please note that where more than one reference number appears to relate to one site, this is where both a residential and an employment (marked with an \*) use has been proposed.

## Consultation Questions:

- Q 78. Do you consider the sites identified to be appropriate for allocation or inclusion within the settlement boundary? (please explain why and quote the settlement and site reference numbers ie. SS0001)**
- Q 79. Are there any other sites/areas which would be appropriate for allocation? (If yes, please provide further information and complete a site submission form)?**

# Community Choice & Neighbourhood Plans

Neighbourhood Plans were introduced by the Localism Act 2011. They provide local communities with the power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They give local communities the ability to choose where they want new development to take place, to say what new buildings should look like and what infrastructure to be provided. Neighbourhood Plans have to be prepared in consultation with the local community and be the subject of a local referendum before they are “made” (adopted). They should support the strategic needs set out in the Local Plan and plan positively to support local development. When made they become part of the Development Plan and are considered alongside the District Local Plan when planning applications are determined.

As at July 2017, neighbourhood plans have been made in Babergh for the parishes of East Bergholt, Lavenham and in Mid-Suffolk for the parish of Mendlesham. A further 14 parishes have been the subject of area designation and plans for these parishes are at various stages of preparation. Full details are available on the District Councils’ website. Neighbourhood plans can be brought forward at any time and can be developed before or at the same time as the local planning authority is producing its Local Plan. It is for the local planning authority to work closely with neighbourhood planning groups to minimise any conflicts between policies in the neighbourhood plan and the emerging Local Plan.

There is an opportunity for local communities to bring forward sites for development in neighbourhood plans in parallel with the developing local plan process and in accordance with the emerging level of growth agreed with the local planning authority and share evidence the evidence being prepared by the Local Planning Authority and vice versa. Where there is a “made”

neighbourhood plan the local community will also benefit from enhanced Community Infrastructure Levy contributions. The Councils therefore encourage local communities to prepare neighbourhood plans, particularly where those communities are identified for growth. If there is any conflict between plans the decision maker must favour the policy which is contained in the last document to become part of the development plan.

# Glossary / Key Terms

## **Accessible and adaptable dwellings**

Accessible and adaptable dwellings were introduced by the Government through revisions to the Building Regulations in 2015, as one of a suite of 'optional' standards that can be required through planning policy. Part M4(2) of the Building Regulations sets out the specifications for accessible and adaptable dwellings.

## **Affordable Housing**

Affordable housing is defined in the National Planning Policy Framework as:

*'Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.'*

*Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.*

*Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).*

*Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can*

*include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.*

*Homes that do not meet the above definition of affordable housing, such as "low cost market" housing, may not be considered as affordable housing for planning purposes.'*

## **Area of Outstanding Natural Beauty**

An Area of Outstanding Natural Beauty (AONB) is designated by Natural England. The purpose of designation is to conserve and enhance the natural beauty of the area.

## **BREEAM**

BREEAM is a method of assessing the sustainability of new non-residential buildings and conversions of existing buildings. Buildings are assessed against a number of sustainability criteria including energy, water use, waste management and procurement, and can be awarded one of six – unclassified, pass, good, very good, excellent or outstanding. A BREEAM assessment can be carried out at the design stage.

## **Building for Life**

Building for Life is a Government-endorsed tool for assessing the design quality of neighbourhoods and homes, and the latest version is Building for Life 12. To achieve Built for Life accreditation, using a traffic light approach a development must score 9 'greens' from a set of 12 questions which revolve around 'integration into the neighbourhood', 'creating a place' and 'street and home'.

## **Building Regulations**

Building Regulations are set by the Government through 'Approved Documents' and cover the construction and alterations to Buildings. Whilst Building Regulations approval is separate to planning permission, planning policies can

require certain 'optional' (higher specification) Building Regulations to be applied.

## Call for Sites

The Planning Practice Guidance requires planning authorities to issue a call for potential sites in order to identify as wide a range as possible of sites that could be suitable for development. The Councils have undertaken two call for sites exercises which involved contacting those on the planning policy database and advertising the process.

## Community Infrastructure Levy

The Community Infrastructure Levy (CIL) was introduced in legislation in 2010 and enables planning authorities to set a 'levy' on new development in order to secure the infrastructure needed. Babergh and Mid Suffolk adopted CIL in 2016. The Charging Schedules set out the rate of CIL that will be charged for different types of development, dependant upon location. The broad categories of infrastructure that CIL will be spent on are set out by the Councils in their Regulation 123 Lists.

## Comparison Retail

Comparison retailing is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.

## Convenience Retail

Convenience retailing is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery.

## County Geodiversity Sites

Geodiversity is defined by the NPPF as the range of rocks, minerals, fossils and landforms. County Geodiversity Sites (CGS) are non-statutory designations identified for their geological interest.

## County Wildlife Sites

County Wildlife Sites are identified by the County Wildlife Site Panel. They are a non-statutory designation, with protection afforded through the planning system and via approaches to land management.

## Custom Build

The Self-build and Custom Housebuilding Act 2015 requires authorities to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in the authority's area in order to build houses for those individuals to occupy as homes. Through the Joint Local Plan the Councils have the opportunity to set out what constitutes a custom build house for the purposes of planning.

## Development Plan

The Development Plan comprises any Development Plan Documents that have been adopted in relation to the area. The Development Plan for Babergh and Mid Suffolk comprises:

### *Babergh:*

- Saved policies of the Babergh Local Plan Alteration No. 2 (2006)
- Babergh Local Plan 2011 – 2031 - Core Strategy and Policies (2014)
- Any 'made' Neighbourhood Plans (currently East Bergholt Neighbourhood Plan 2015 – 2030 (July 2016) and Lavenham Neighbourhood Plan (July 2016))

### *Mid Suffolk:*

- Mid Suffolk Local Plan (1998) (saved policies only)
- First Alteration to the Mid Suffolk Local Plan (July 2006)
- Mid Suffolk Core Strategy Development Plan Document (2008)
- Mid Suffolk Core Strategy Focused Review (2012)
- Stowmarket Area Action Plan (2013)



- Any ‘made’ Neighbourhood Plans (currently Parish of Mendlesham Neighbourhood Development Plan 2016 – 2031 (November 2016))

The Development plan also includes adopted Minerals and Waste plans, which are produced by Suffolk County Council.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that decision must be taken in accordance with the Development Plan unless material considerations indicate otherwise.

Once adopted, the Joint Local Plan will be the Development Plan for Babergh and Mid Suffolk, alongside ‘made’ Neighbourhood Plans and Minerals and Waste Plans.

### **Duty to Co-operate**

The Duty to Co-operate was introduced through the Localism Act 2011. It places a duty on local planning authorities to co-operate with other specified bodies in relation to strategic matters.

### **East of England Forecasting Model**

The East of England Forecasting Model (EEFM) is managed by Cambridgeshire Econometrics, part of Cambridgeshire County Council, on behalf of local authorities across the East of England. The model provides jobs forecasts, and associated demographic and housing forecasts. The latest EEFM run was published in August 2016.

### **Edge of Centre**

Edge of Centre is defined for retail purposes in the National Planning Policy Framework as being a location which is well connected and up to 300m from the Primary Shopping Area.

### **Employment Land Needs Assessment**

The Employment Land Needs Assessment (ELNA) was commissioned by Babergh and Mid

Suffolk District Councils along with Ipswich Borough Council, Suffolk Coastal District Council and Waveney District Council to define the Functional Economic Area and identify the qualitative and quantitative need for employment land across the Districts. The ELNA was based upon the 2015 East of England Forecasting Model jobs forecasts and was published in 2016.

### **Employment Land Supply Assessment**

The Employment Land Supply Assessment (ELSA) was commissioned by Babergh and Mid Suffolk District Councils along with Ipswich Borough Council and Suffolk Coastal District Council to assess the sites that were put forward for employment uses as part of the call for sites process.

### **Exception Test**

In relation to flood risk, in instances where the sequential test has been followed but it is not possible to locate development in an area of lower flood risk, the Exception Test may be applied. For the Exception Test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment where one has been prepared; and a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere and where possible will reduce flood risk overall.

### **Functional Clusters**

Functional Clusters are defined geographies which reflect the role that larger settlements play in meeting the needs of those living in smaller settlements. For Babergh, Functional Clusters are defined in the Babergh Local Plan (2011 – 2031) Core Strategy and Policies (2014). For Mid Suffolk, it is proposed that Functional Clusters are

established for Mid Suffolk through the new Joint Local Plan.

## **Functional Economic Area**

The Functional Economic Area is established in the Employment Land Needs Assessment. It is based upon analysis of travel to work areas, housing market areas and commercial property market areas. Babergh and Mid Suffolk sit within the Ipswich Functional Economic Area along with Ipswich and Suffolk Coastal.

## **Green Infrastructure**

Green Infrastructure is defined by the NPPF as a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

## **Habitats Regulations Assessment**

A Habitats Regulations Assessment is an assessment carried out under the Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora). The Directive requires that any plan or project not directly connected with or necessary to the management of a European protected site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. As part of the production of the Joint Local Plan a Habitats Regulations Assessment will be carried out, initially to ascertain whether there are likely to be any significant effects.

## **Haven Gateway / Haven Gateway Partnership**

Babergh and Mid Suffolk District Councils are both part of the Haven Gateway Partnership. The Partnership provides a framework through which to promote the Haven Gateway sub-region, which

is centred around the Ports of Felixstowe and Harwich.

## **Heritage Assets**

Heritage assets are defined by the NPPF as buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, because of their heritage interest. Heritage assets include designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Site, Registered Parks and Gardens, Registered Battlefields and Conservation Areas) and non-designated heritage assets.

## **Housing Market Area**

The Housing Market Area is an area which is reasonably self-contained in relation to migration (housing moves) and commuting. The Housing Market Area for Babergh and Mid Suffolk has been defined through the Strategic Housing Market Assessment and also comprises the areas covered by Ipswich Borough Council and Suffolk Coastal District Council.

## **Ipswich Policy Area / Ipswich Policy Area Board**

Ipswich Policy Area was identified in the former Suffolk Structure Plan (2001) in recognition of the functional relationship between areas adjacent to Ipswich Borough and that form part of or are well related to the urban area of Ipswich but which are within Babergh, Mid Suffolk and Suffolk Coastal Districts. The Ipswich Policy Area Board is established as a forum in which the four local planning authorities, along with Suffolk County Council, can work together on strategic planning matters. The Ipswich Policy Area is currently drawn to include the parishes shown on the map on the Ipswich Policy Area webpage - <https://www.ipswich.gov.uk/content/ipswich-policy-area>.

## **Indices of Multiple Deprivation**

The Indices of Multiple Deprivation are a national measure of relative deprivation in small areas in England called lower-layer super output areas. The indices cover the topics of income; employment; education, skills and training; health and disability; crime; housing and living environment.

## **Infrastructure Delivery Plan**

An Infrastructure Delivery Plan (IDP) sets out the infrastructure required in an area, when it will be provided and how it will be funded. The Councils will produce an Infrastructure Delivery Plan alongside production of the Joint Local Plan.

## **Joint Strategic Plan**

The Councils' Joint Strategic Plan was produced in 2013/14 and refreshed in 2016. The Joint Strategic Plan sets out a framework for delivering the Councils' services over the period 2016 – 2020.

## **Local Development Scheme**

The Local Development Scheme was approved in March 2017 and sets out the programme and timetable for the production of the new Joint Local Plan.

## **Local Green Space**

Local Green Spaces are green areas of particular importance to local communities, and where development can be ruled out other than in very special circumstances. The NPPF states that Local Green Space must be in reasonably close proximity to the community it serves; be demonstrably special to a local community and hold particular local significance (for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife); and be local in character and not an extensive tract of land.

## **Local List**

A Local List is a list which features non-designated heritage assets identified as being of importance to the local historic environment. Local lists can be produced by local communities in conjunction with the District Councils. There are currently two adopted Local Lists in Babergh (Nayland and Sudbury) and none in Mid Suffolk.

## **National Planning Policy Framework**

The National Planning Policy Framework (NPPF) was published by the Department of Communities and Local Government in 2012. It is the key piece of national planning policy and is supported by guidance in the form of the Planning Practice Guidance. In considering whether a Local Plan is 'sound', through the Examination process, the Councils will need to be able to demonstrate that the plan accords with the policies within the NPPF.

## **Neighbourhood Plan**

The Localism Act 2011 introduced a power for communities to produce a Neighbourhood Plan which gives communities an opportunity to shape and influence development in their area. 'Made' Neighbourhood Plans form part of the Development Plan. There are currently two 'made' Neighbourhood Plans in Babergh (East Bergholt and Lavenham) and one in Mid Suffolk (Mendlesham).

## **New Anglia Local Enterprise Partnership**

The New Anglia Local Enterprise Partnership (NALEP) is a business-led collaboration between private, public and education sectors covering the whole of Suffolk and Norfolk. The NALEP is funded by Government and in turn provides funding and support for growing the local economy.

The NALEP published a Strategic Economic Plan (SEP) in 2014. The SEP identifies five 'high impact' sectors for targeting support – Advanced manufacturing and engineering, agri-tech, energy, ICT/digital culture and life sciences. It also identifies growth locations which include Stowmarket in Mid Suffolk and Sudbury in Babergh.

The New Anglia LEP are currently developing a new Economic Strategy, the delivery of which will act alongside the delivery of the new Joint Local Plan.

### **Objectively Assessed Need**

The term Objectively Assessed Need (OAN) relates to the need for housing. The OAN has been established through the Strategic Housing Market Assessment. The OAN is the 'starting point' for setting the housing requirement in the Joint Local Plan.

### **Out of centre**

A location which is outside of the defined town centre and not capable of being described as 'edge of centre'.

### **Permanent Gypsy and Traveller Site**

A permanent Gypsy and Traveller Site is one which is intended for permanent residential use, rather than for temporary transit or short stay stopping purposes.

### **Planning Practice Guidance**

The Planning Practice Guidance accompanies the national planning policy set out in the NPPF. It provides guidance on how local planning authorities should apply the policies contained in the NPPF, or other planning-related statements of national policy or legislation. It is web-based and is updated periodically.

### **Planning Obligations**

The NPPF defines planning obligations as a legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal. They are commonly known as Section 106 agreements. Section 122 of the Community Infrastructure Levy Regulations 2010 (as amended) states that a planning obligation may only constitute a reason for granting planning permission for the development is the obligation is:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

### **Primary Shopping Area**

Defined area where retail development is concentrated (comprising the primary and secondary shopping frontages). The Babergh and Mid Suffolk Joint Retail and Town Centres Study provides recommendations in relation to the extent of the Primary Shopping Areas.

### **Primary Shopping Frontage**

Primary Shopping Frontage includes a high proportion of retail uses. These have been defined through the Babergh and Mid Suffolk Joint Retail and Town Centres Study.

### **Regionally Important Geological and Geomorphological Sites**

Geodiversity is defined by the NPPF as the range of rocks, minerals, fossils and landforms. Regionally Important Geological and Geomorphological Sites (RIGS) are non-statutory designations identified for their geological interest.

## Secondary Shopping Frontage

Secondary frontages have a greater diversity of uses than Primary Shopping Frontages. These have been defined through the Babergh and Mid Suffolk Joint Retail and Town Centres Study.

## Sector Needs Assessment

The Sector Needs Assessment (SNA) (part of the ELSA commission) updates the qualitative and quantitative need for employment land provided in the ELNA based on the 2016 East of England Forecasting Model and identifies the spatial requirements related to the needs of employment sectors.

## Self Build

The Self-Build and Custom Housebuilding Act 2015 requires the authorities to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in the authority's area in order to build houses for those individuals to occupy as homes. Self-build is defined for the purposes of the Community Infrastructure Levy as all homes built or commissioned by individuals or groups of individuals for their own use, either by building the home on their own or working with builders.

## Sequential Test (flooding)

The Sequential Test in relation to flooding seeks to ensure that development is located away from areas of higher flood risk where possible. For the purposes of plan-making, the Strategic Flood Risk Assessment should be used to steer development to lower flood risk areas. Where the Sequential Test concludes that there are not sufficient sites in a suitable lower risk flood zone(s), it may be necessary to apply the Exception Test. The acceptability of flood zones to development depends upon the vulnerability of the proposed use.

## Sequential Test (retail)

The Sequential Test for retail uses is established in national planning policy. The National Planning Policy Framework requires the sequential test to be applied in relation to applications for main town centre uses that are not within a town centre. Locations within town centres should be considered first, followed by edge of centre locations and finally out of centre locations.

## Settlement hierarchy

The settlement hierarchy categorises settlements based upon their role in terms of levels of service provision. Settlement hierarchies are currently established in the Mid Suffolk Core Strategy (2008) and the Babergh Local Plan (2011 – 2031) Core Strategy (2014). Revisions to the settlement hierarchy are proposed through this consultation, including to establish one consistent hierarchy across both Districts.

## Site of Special Scientific Interest

Sites of Special Scientific Interest are protected areas designated by Natural England under the Wildlife and Countryside Act 1981. Sites are designated for either wildlife or geological interest.

## Special Area of Conservation

Special Areas of Conservation are habitats protected under the Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora). An assessment of potential effects arising through the production of the Joint Local Plan is undertaken through carrying out a Habitats Regulations Assessment.

## Special Protection Area

Special Protection Areas are habitats of importance for bird species protected under the Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of

wild fauna and flora). An assessment of potential effects arising through the production of the Joint Local Plan is undertaken through carrying out a Habitats Regulations Assessment.

## **Starter Homes**

Under The Housing and Planning act 2016 a Starter Home:

- (a) is a new dwelling,
- (b) is available for purchase by qualifying first-time buyers only,
- (c) is to be sold at a discount of at least 20% of the market value,
- (d) is to be sold for less than the price cap, and
- (e) is subject to any restrictions on sale or letting specified in regulations made by the Secretary of State

The price cap outside of London is set at £250,000, and a qualifying first time buyer must be at least 23 years old but under the age of 40.

The Housing White Paper (February 2017) includes a number of proposals in relation to Starter Homes including requiring households to have an income of less than £80,000, requiring some or all of the discount to be repaid if the home is sold within 15 years and including Starter Homes within the definition of affordable housing.

## **Strategic Housing and Employment Land Availability Assessment**

The Strategic Housing and Employment Land Availability Assessment (SHELAA) is an assessment of land availability which identifies a future supply of land which is technically suitable, available and achievable for housing and economic development uses over the plan period. The SHELAA is a key piece of evidence from which sites will be selected for allocation through the process of producing the Joint Local Plan. Sites put forward through the Call for Sites which have been assessed as suitable, available and achievable will be incorporated in the SHELAA.

## **Strategic Housing Market Assessment**

The Strategic Housing Market Assessment is a key piece of evidence and is required by the National Planning Policy Framework. The Strategic Housing Market Assessment identifies the Objectively Assessed Need for housing (OAN) and the mix and type of housing, including affordable housing, required over the plan period.

## **Structure Plan**

Structure Plans formed part of the Development Plan until the introduction of now-abolished Regional Spatial Strategies under the Planning and Compulsory Act 2004. The 2001 Suffolk Structure Plan was the final Structure Plan to cover Babergh and Mid Suffolk but is no longer in force.

## **Suffolk Strategic Planning and Infrastructure Framework**

Based upon a shared ambition to secure greater levels of growth and to secure the infrastructure that Suffolk needs, the Councils across Suffolk have been working towards the development of a Strategic Planning and Infrastructure Framework (SPIF). The creation of the SPIF would enable Suffolk to prioritise its aspirations for key infrastructure, with an understanding of the levels of growth that would be required to help deliver this. Consultants were commissioned in summer 2016 to analyse the potential for growth across the county and to consider the relationship of this to infrastructure delivery. The outputs of this work will be considered as the Local Plan progresses.

## **Town Centre**

The Town Centres are defined areas which are characterised by offering a range of main town centre uses, which include retail, leisure, cultural and office uses.

## Transit Gypsy and Traveller Site

A Transit Site (also known as a Short Stay Stopping Site) is a site intended for use by Gypsies and Travellers for a short amount of time whilst travelling. The length of continuous stay on a Transit Site is limited to a maximum of 12 weeks.

## Travelling Showpeople's Yard

A Travelling Showpeople's Yard is the location at which Travelling Showpeople have their permanent residence and will usually include space for storage of equipment.

## Use classes

Use classes are defined in the Town and Country Planning (Use Classes) Order 1987 (as amended) and are defined as:

### Part A

- A1 Shops - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes.
- A2 Financial and professional services - Financial services such as banks and building societies, professional services (other than health and medical services) and including estate and employment agencies. It does not include betting offices or pay day loan shops - these are now classed as "sui generis" uses (see below).
- A3 Restaurants and cafés - For the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes.
- A4 Drinking establishments - Public houses, wine bars or other drinking establishments (but not night clubs).
- A5 Hot food takeaways - For the sale of hot food for consumption off the premises.
- AA Drinking establishments with expanded food provision

### Part B

- B1 Business - Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.
- B2 General industrial - Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).
- B8 Storage or distribution - This class includes open air storage.

### Part C

- C1 Hotels - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels).
- C2 Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.
- C2A Secure Residential Institution - Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks.
- C3 Dwellinghouses - this class is formed of 3 parts:
  - C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.
  - C3(b): up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.
  - C3(c) allows for groups of people (up to six)

living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger.

- C4 Houses in multiple occupation - small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

#### **Part D**

- D1 Non-residential institutions - Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court. Non residential education and training centres.
- D2 Assembly and leisure - Cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreations (except for motor sports, or where firearms are used).

#### **Sui Generis**

- Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: betting offices/shops, pay day loan shops, theatres, larger houses in multiple occupation, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, laundrettes, taxi businesses, amusement centres and casinos.

### **Wheelchair accessible dwellings**

Wheelchair accessible dwellings were introduced by the Government through revisions to the Building Regulations in 2015, as one of a suite of 'optional' standards that can be required through planning policy. Part M4(3) of the Building Regulations sets out the specifications for wheelchair accessible dwellings.