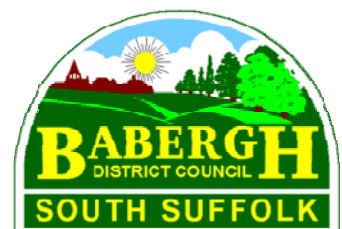


Babergh District Council Local Development Framework Core Strategy Issues and Options Report



Contents

Section	Page Number
1. Introduction	3
2. Spatial Portrait	6
3. Spatial Vision and Spatial Objectives	9
4. Spatial Strategy	12
5. Housing Page	29
6. Economy and Employment	37
7. Built and Natural Environment	41
8. Sustainability and Climate Change	47
9. Retail and Town Centres	52
10. Social and Community Infrastructure	55
11. Physical Infrastructure	62
12. Monitoring and Implementation	66
Glossary	68
Environmental Map	43

1 Introduction

The Local Development Framework

- 1.1. In September 2004 the government introduced a new plan system to manage spatial planning in England. Before this each local authority had a Local Plan. The Planning system now requires Local Authorities to have Local Development Frameworks (LDF). The LDF consist a number of planning documents containing the local authority's planning policies and proposals to guide development in their area for a 15 year period.
- 1.2. The Local Development Framework will eventually replace the current Babergh Local Plan and will initially provide guidance up to 2027. The development plan documents to be included in the Babergh Local Development Framework are the Core Strategy; Site Specific Allocations; and Development Control Policies.

The Core Strategy

- 1.3. The Core Strategy is a key document in the Local Development Framework. It is a strategic document that sets out the vision and spatial strategy for the Babergh District. It will set out clear elements of the planning framework for the area and will provide a long term spatial vision for Babergh and how that vision will be met, including working with other organisations to achieve this. It will be developed in stages with opportunity for consultation after each stage. The first of these stages is the informal consultation stage regarding the Issues and Options, the second stage will be the formal consultation stage on the draft Core Strategy (or the preferred options). The Core Strategy is about broad issues and does not deal with detailed information on development control or site-specific issues. These issues will be addressed in subsequent documents. We anticipate that work on the Site Specific Allocations will start in the spring of 2010.

The Issues and Options Report

- 1.4. The informal consultation stage or Issues and Options report involves early consultation with the community and other stakeholders. The aim of this report is to highlight the main issues to be addressed in the Core Strategy and possible options to address these issues. The issues represent the problems and changes, and the options are the possible solutions. The issues and options in this document are widespread and won't cover options for everything. For example the document will look at overall levels of growth but not at specific sites, that will be dealt with in the Site Specific Allocations document.

Sustainability Appraisal

- 1.5. A Sustainability Appraisal will be completed for the Core Strategy, assessing the anticipated impacts of each of the options on the social, economic, environmental, and sustainable development objectives. The document will be

prepared in accordance with the Babergh Sustainability Appraisal Scoping Report. The report will be published on the Council's website.

Evidence Base

- 1.6. In addition, important technical evidence has been collected by Babergh to assist with the preparation of the Core Strategy. Those studies include:

- Employment Land Review
- Strategic Housing Market Assessment and Viability Study
- Strategic Housing Land Availability Assessment
- Housing Needs Survey
- Retail Study
- Sudbury and Hadleigh Town Centre Health Checks
- Strategic Flood Risk Assessment
- Open Space Assessment
- Parish Profiles
- Infrastructure Capacity

The information gathered in these technical studies will justify the 'soundness' of the Core Strategy document.



How can you comment on the document?

- 1.7. We would like your thoughts and views on the issues and options in this document and all comments received will be considered in the preparation of the draft Core Strategy (Preferred Options). This document can be downloaded from the Babergh Council website at www.babergh.gov.uk. The document can also be viewed at the Council Offices in Hadleigh, all libraries across the district and at the Sudbury and Hadleigh Town Halls.
- 1.8. We encourage comments to be sent in electronically via our online consultation which can be access on the Babergh website. If you are unable to get access to the internet you can post your comments to: Babergh District Council, Planning Policy Team, Corks Lane, Hadleigh, Ipswich, Suffolk, IP7 6SJ. Comments can also be emailed to ldf@babergh.gov.uk
- 1.9. The Issues and Options consultation ends on the **26th of May 2009 at 5 pm**. For enquiries and to request a copy of the Issues and Options document please call 01473 826678.

- 1.10. **Please note that no comments (electronic or written) can be treated as confidential.**

What Happens Next?

- 1.11. Once the consultation for this Issues and Options report has finished the Council will review and consider all comments received during the consultation period. The comments received will be taken into account and considered when producing the next stage of the Core Strategy that will set out the draft Core Strategy policies or the preferred options of the Council.
- 1.12. The draft Core Strategy document will be subject to a formal public consultation period. Once this second consultation is completed, the final document will be prepared for submission to the Secretary of State and it will then be subject to an independent examination. The inspector responsible for the examination will check that the authority has prepared the document legally and test whether it is 'sound'. For the Core Strategy to be considered sound the document should be justified, effective and consistent with national policy.
- “Justified” means that the document must be:
- founded on a robust and credible evidence base
 - the most appropriate strategy when considered against the reasonable alternatives
- “Effective” means that the document must be:
- deliverable;
 - flexible; and
 - able to be monitored
- 1.13. After the inspector has examined the document he/she will produce a binding report with his/her recommendations. Babergh District Council will then make the changes to the document before it is adopted by the Council.

It is anticipated that the consultation periods regarding the Core Strategy will occur as follows:

Core Strategy Reports	Consultation Date
1 st Stage : Issues and Options	April/ May 2009
2 nd Stage: Draft Core Strategy (preferred options)	Winter 2009
3 rd Stage: Submission of Core Strategy (final Core Strategy)	March 2010

The dates in this table may be subject to change.

2 Spatial Portrait of Babergh District Council

2.1. An overview of Babergh district has been provided by the latest Annual Monitoring Report for 2007-8, published by the Council (paper copies are available or please see: www.babergh.gov.uk/babergh/ldf) as well as the Babergh District Council Sustainability Appraisal Scoping Report (paper copies are available or it can be viewed online at the above mentioned web link).

2.2. The Babergh District is mainly rural in character and covers an area of 230 square miles (596 square kilometres). A brief overview of the social, economic and environmental characteristics is provided below.

2.3. Social characteristics

- It is estimated that Babergh had a population of 86,910 in 2006. This is 12.5% of the population of Suffolk County and the second smallest district in the County.
- Babergh has 76 parishes with only 21 of these parishes that had a population of over a 1000 people in 2006.
- Only 18 of the 76 parishes are considered to have most of the key services and facilities within them. These parishes are fairly evenly distributed throughout the district.
- Some areas of eastern Babergh are ranked in the worst 10% in the country for access to housing and other services. Local facilities such as shops and post offices are under threat in a number of areas and villages are under pressure to maintain their viability.
- Babergh has two main centres of population. The largest settlement is Sudbury (including Great Cornard), which had a population of just over 20,000 people in 2006. Hadleigh, the second largest town, had a population of over 8,000 in 2006.
- Babergh's population have risen by 3.8% over the period 2001-2006. It is predicted that the population will rise by 4.9% between 2001 and 2021 to 89,500.
- The district has an ageing population with 19% of the total population older than 65 years in 2001. It is predicted that this figure will increase to 29% of the total population in 2021.
- Good road and rail networks are present from the district to Ipswich, Colchester, Bury St Edmunds, Norwich, Chelmsford, Cambridge and London.
- Affordability of housing is a serious issue in Babergh and 2008 figures shows that an average house price is 10 times higher than the average wages in the area.
- Levels of crime (53 crimes reported per 1000 population in 2006/2007) and deprivation are low for Babergh, and the incidence of crime is reducing. However, crime and disorder is still an important issue for many local people and fear of crime is disproportionate to the levels of crime in the area.
- Educational levels (up to and including GCSE level) for Babergh are higher than those for Suffolk. A total of 81% primary school attainment was achieved in

Babergh during 2006 in comparison to 79% primary school attainment achieved in Suffolk during 2006.

2.4. Economic characteristics

- Babergh has a small local economy, less than half the size of the average for Britain.
- The district has a low level of unemployment (1.4% of the population in 2006). These figures do not reflect the recent changes as a result of the economic recession and this will have to be updated when more recent figures are available.
- Babergh District has a diverse economy with a strong manufacturing sector and distribution, hotel and restaurant sector, a declining agricultural base and a tourism industry with significant growth potential.
- 70% of workers are employed in the service sector, 25% in manufacturing and construction sector and 5% in agriculture.
- The average gross earnings in Babergh are slightly below the Suffolk average (£7 per week less in 2007) and well below the national average (£75 a week less).
- The market towns of Sudbury and Hadleigh make a notable contribution to employment within the district.
- There are relatively high levels of small businesses, in 2005 about 12% of the working population were self employed.
- There are gaps in the skills and education base. Whilst Babergh performs better than the GB average up to and including GCSE Level (NVQ2), it performs lower at A Level (NVQ3) and above.
- Many young adults move out of the area seeking higher education, higher paid employment and, sometimes, housing opportunities. Babergh has 8.6% of its population in their twenties compared with 13% nationally.
- The 2001 Census figures recorded that 43% of the workforce in Babergh travel outside of the district for employment; most by travelled by car and on average they travelled 17.45 miles to work. Babergh together with Mid Suffolk has the largest proportion of outward commuting workforce in Suffolk.



2.5. Environmental characteristics

- The Babergh District has a varied landscape consisting of undulating arable farmland interspersed with river valleys, and the Orwell and Stour estuaries on the eastern and south-eastern borders of the district.

- The Stour and Orwell estuaries in Babergh have a distinct and precious character and both these sites are designated as Ramsar Sites and Special Protection Areas.
- Babergh contains many areas of attractive countryside including the nationally designated Dedham Vale and the Suffolk Coasts and Heaths Areas of Outstanding Natural Beauty (AONB).
- There are 53 Sites of Special Scientific Interest and 231 County Wildlife Sites in Babergh.
- Babergh has around 4,000 listed buildings, 28 conservation areas, 34 scheduled ancient monuments and 5 registered historic parks and gardens.
- The value of the natural and built environment in the District, including the internationally renowned areas of 'Constable Country' and the medieval wool villages of Lavenham and Kersey, form the basis for a strong local tourism industry.
- There is a need to reduce the amount of waste going to landfill as space rapidly runs out in Suffolk and other parts of the region.
- Traffic congestion and air pollution due to traffic is also an issue in some parts of the district.

3 Spatial Vision and Spatial Objectives

Core Strategy Spatial Vision

- 3.1 The local context provided in the Spatial Portrait section must be set against the backdrop of the national and regional context, including the agendas that are prevalent at these levels and the planning policies to which the district needs to have regard. Overall, the key agenda that planning for the future of Babergh must align with is to ensure that a planned sustainable strategy is developed and delivered. This does not mean that the strategy is sustainable just environmentally, but also economically and socially and generally in equal measure.
- 3.2 It is necessary that from the outset the Core Strategy identifies a clear vision of what it is that the LDF aims to achieve. So, in spatial terms, what is the kind of district that we are trying to maintain, evolve or create over the period of the next 15 – 20 years? The objectives that will support this vision must also be identified now. Of course, we are not starting from a completely blank canvas. Much debate, public consultation and input has already been carried out by Babergh and its partner organisations and we need to reflect and develop this to ensure that we produce a finalised new Plan that is built upon the best possible consensus and the widest range of inputs.
- 3.3 The existing Local Plan adopted in 2006 also provides a basis from which to start and may provide some elements that could remain within the Core Strategy. This set out the following broad aims:
- to conserve and enhance the natural and built environment including the cultural heritage of the Babergh District; and
 - to accommodate new growth and future development of the Babergh District in ways that will enhance the environment, improve the quality of life and create opportunities to sustain and enhance its economic well-being
- 3.4 Since then a new form of community focused approach has emerged. This is the 'Sustainable Community Strategy', along with the values / objectives of the Local Strategic Partnerships that develop them. Babergh is covered by two LSP areas (Western Suffolk LSP and Babergh East LSP) and must therefore take both into account. The new Plan needs to reconcile these for the district, since it is essential that the Core Strategy operates at a broad, strategic level and provides for the whole district in a unified way, whilst also respecting its diversity.
- 3.5 For Western Suffolk LSP's the identified objectives are to:
- " Maximise the potential of all children and young people;
 - Develop and maintain a safe, strong and sustainable community;

- Create and support healthier communities; and
- Develop a prosperous and sustainable economy”.

3.6 For Babergh East the LSP’s identified vision is:

- “To improve the economic, social and environmental well-being of the communities in Babergh East”.

This vision is supported by the following objectives, including shared action to achieve:

- “The development of programmes / projects which engage with young people and promote a sense of active citizenship and
- Support and advocate projects which raise opportunities for local communities to access jobs and training”

3.7 Thus there is much in common between the two, as they focus very much on the communities of people in their areas and the quality of life they are able to lead. The three strands of sustainable development come through, particularly in the East and economic issues, (including jobs and training) are pinpointed by both LSPs. To this we can add Babergh Council's identified vision, as follows:



‘To provide community leadership which recognises that everybody matters and which encourages and supports strong and inclusive communities. Whilst respecting and protecting our heritage and environment, Babergh will willingly embrace change where that is of benefit to its residents and the district’

The vision to which we work must recognize and respect Babergh as a place and reflect its local distinctiveness.

3.8 It is suggested therefore that in short form, the collective vision for the district and the role of the LDF in it should be:

To create a shared spatial strategy that will manage and improve the environmental, economic, and social well-being of Babergh and ensure that its residents (plus workforce and visitors) enjoy the best possible quality of life for the long-term.

Question SVO1: Do you agree with the broad content of this statement?

Core Strategy Spatial Objectives

3.9 The Core Strategy needs to identify specific and measurable spatial objectives that will support and help deliver the agreed vision. The recently adopted Local

Plan identified the following strategic aims for the planning of Babergh district through delivery of sustainable development by:

- allocating sufficient land for housing, employment and other uses to achieve consistency with national planning policy / guidance and regional planning policy to meet the needs of the district;

This objective may benefit from a reference to these areas of land supply being flexible and responsive to changing circumstances

- steering this development to those parts of the Babergh District which are already well supported by services; are well served by public transport; have a range of employment opportunities; and are not protected by national or county level conservation designations;
- making the most of the District's intrinsic qualities and attractions;
- promoting economic growth in a positive manner through a number of policies and initiatives;
- conserving and enhancing the District's exceptional natural and built environments;
- encouraging a wide range of shopping, leisure and recreational facilities;
- promoting the prosperity of the District's two town centres, Sudbury and Hadleigh; and
- encouraging sustainable development and other measures to help protect the global environment.

In addition, it seems advisable to add an extra objective to suggest that the overall planning strategy should allow for contingencies if its 'Plan A' is not realized but also be sufficiently flexible and adaptable to be able to deal with any relevant changes of circumstances during the lifetime of the Plan. It would also seem appropriate to add an extra new objective concerned with ensuring that all new development makes sufficient provision for all of its infrastructure needs – in the form of new and /or improved infrastructure

- 3.10 It is not suggested that the new Plan merely replicates these aims through this Core Strategy but the above aims appear to be a reasonable point from which to begin discussion and consideration as to whether we wish to continue, amend or replace these specific objectives.
- 3.11 Focusing on substantive content, the following questions are suggested to guide thinking and responses:

Question SVO2: Do you consider that these Local Plan aims are still appropriate to guide the Core Strategy?

Question SVO3: Are there gaps or inadequacies in these that need to be addressed as new spatial objectives?

4 Spatial Strategy for Babergh district

Background

- 4.1. Growth and further development within the district are a 'given' requirement for the district's future and for Babergh's new Plan to address, primarily through the Core Strategy. However, the scale of this growth and how best to accommodate it are the key issues to address. This applies equally to both housing and economic / jobs growth and it is vital that the two are balanced in the interests of ensuring that future development is sustainable. Striking and maintaining this balance will be easier said than done, although the planning approach in Babergh has paid particular attention to ensuring that economic / jobs growth is fostered to avoid an excess of uncontrolled housing growth at the former's expense. A question also arises over whether growth should be housing led or jobs led and this will need consideration within the context of the various questions raised within the Core Strategy.
- 4.2. This Core Strategy must provide a clear Plan for the period from 2011 to 2027, since we are required to plan for at least 15 years of housing supply from the date that this document is adopted (expected to be in 2011, with a planned allowance of 1 year for any substantial, unforeseen circumstances / slippage). The current East of England Plan was adopted recently (May 2008) and covers the period from 2001 – 2021 but whilst this Core Strategy is being produced, the regional Plan is being reviewed in parallel and rolled forward to 2031. So, at the same time, it is necessary to consider the period to 2031. Whether this Core Strategy plans forward to 2027 or 2031 is not a key question, since the strategy will need to provide a sufficiently robust and flexible framework for the district's future development strategy either way. Therefore, it is proposed to look forward primarily as far as 2027 but simultaneously have regard to and allow for circumstances as far as 2031.
- 4.3. The scale of housing development required in Babergh to 2021 is known and this can be projected forward to 2027. This comes from the new regional Plan, which makes it clear that the housing numbers are to be treated as minima to be achieved, instead of ceilings that should not be exceeded. In doing so, it will be necessary to employ the plan, monitor, manage approach towards new housing development.
- 4.4. A good level of guidance is provided to steer a spatial strategy for the district, including national planning policy / guidance and the regional Plan. The current adopted Local Plan also provides a basic framework for the new spatial strategy (having itself been influenced by the Suffolk Structure Plan 2001). These need to be applied to the specific Babergh context and a key question will be to consider how closely these relate to Babergh's current / emerging context and whether there are any specific local circumstances or reasons to diverge from this established policy framework.

4.5. Key evidence base research studies for these themes are:

- Housing Needs Survey 2008
- Strategic Housing Market Assessment (and associated viability study) 2008/9
- Strategic Housing Land Availability Assessment 2009
- Infrastructure Capacity Study 2008/9

Turning to local perspectives on this matter, the Sustainable Community Strategies and other local consultation have the following implications for and links to the district's spatial strategy and key housing issues.

Suffolk LSP	Western Suffolk LSP	Babergh East LSP	BDC Strategic Plan
<p>A prosperous and vibrant economy Affordable, quality housing for all</p> <p>The Greenest County Reduce Suffolk's carbon footprint and adapt to the changing climate</p> <p>Safe, healthy and inclusive communities</p> <p>A sense of belonging within communities that are valued, engaged and supported Cohesive Communities</p>	<p>Develop and maintain a safe, strong and sustainable community</p> <p>Create and support healthier communities</p> <p>Make Western Suffolk a safer place and build a stronger community</p> <p>Protect our natural environment and local biodiversity and ensure sustainable development</p>	<p>Maintaining the quality of the environment</p> <p>Affordable housing</p> <p>Provision and retention of employment sites to encourage economic development (including tourism)</p>	<p>A greener and cleaner Babergh The right balance between protecting the natural environment and supporting development opportunities for the area and its people A smaller carbon footprint for the area</p> <p>Quality homes that local people can afford There are enough good quality homes which meet high environmental and sustainability standards to meet the needs of the people of Babergh. There are enough affordable homes to meet the needs of the people of Babergh. New housing developments are supported by adequate infrastructure improvements. Fewer people are homeless</p> <p>Vibrant places and strong communities Reduce impact of rural isolation, particularly limited access to affordable housing, transport and jobs. Active villages and communities Individuals have a sense of belonging within cohesive communities where everyone is valued</p>

4.6. The geography and settlement pattern of Babergh, with only 2 market towns (of limited size) and its part of the Ipswich fringe built up area, mean that the range of options for accommodating new development are relatively limited for the

district. Accordingly, it is not considered necessary to define a rigid settlement hierarchy for Babergh, which can be helpful in districts that contain many different towns and different types of settlement.

Spatial Strategy

- 4.7. The scale of residential development to provide between now at 2008 and 2027 (5,450 dwellings) is very similar to that to accommodate between 2001 and 2021 (5,600 dwellings) under the adopted Regional Spatial Strategy (or 'RSS'). However, the Core Strategy does not start with a completely 'blank canvas', since much of this development is already planned for (through the recently adopted Local Plan, planning permissions, etc). Accordingly, just over a half (2,950 at least) of these new dwellings are already effectively provided for. The Local Plan set out a distribution of allocated sites as follows:

Sudbury / Great Cornard 1470 (75.5% or 75% rounded)

Hadleigh 190 (9.6% or 10% rounded)

Rural Areas (inc. Ipswich fringe) 290 (14.9% or 15% rounded)

NB All figures rounded

- 4.8. The first key question to address therefore is: What strategy is most appropriate for distributing the remaining housing required for the district's future? Under all these approaches, it would be necessary to ensure that the housing development allocated to each area would be matched by an appropriate level of new jobs.



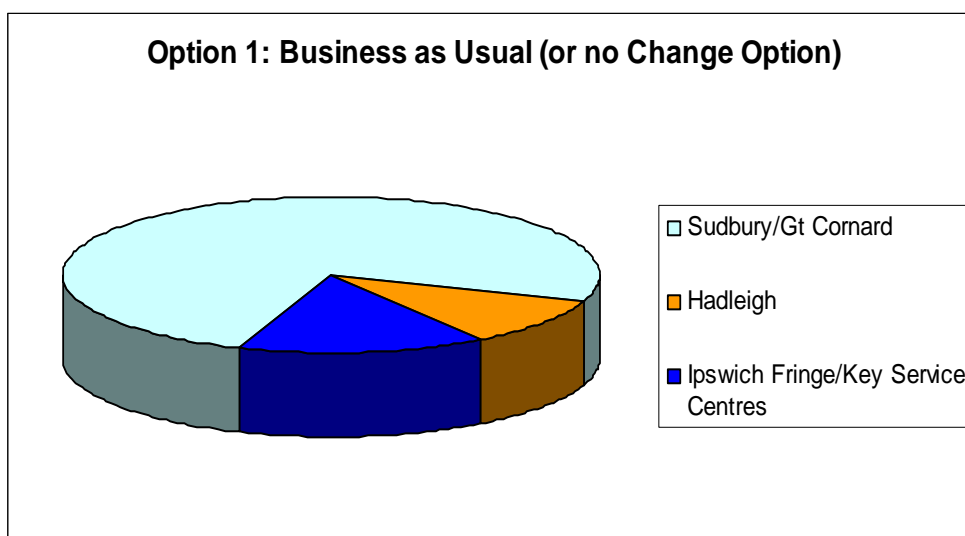
Option 1: Business as Usual (or 'No Change' option)

- 4.9. This option would essentially replicate the approach towards distributing housing development as set out in our existing Local Plan adopted in 2006 but with regard to current RSS allocation targets. This section describes what this would mean for each part of the district:
- 4.10. Sudbury / Great Cornard and adjoining areas would continue to be the location that provides for major scale development, generally in line with the capacity that local infrastructure, local facilities and services already have. This would need to rely on new sites being found within the urban area but in likelihood, mostly further greenfield land at the edges of this, the district's largest urban area. This would mean that the identification of a new large strategic greenfield site (or otherwise sites (2 or more) of a smaller scale, would be necessary and this (or these) would need to be found at edges of the town where major development constraints (such as flood risk) are avoided. Any such strategic site(s) would need to be comprehensive, new, mixed developments providing not only for housing but also for matching employment uses, local services, facilities and infrastructure required to support them. This approach would reaffirm and

- promote further Sudbury / Great Cornard's role as the district's largest urban area, with the greatest concentration of housing, jobs and commercial activities, together with the largest district town centre. In this way, the town's self-containment (including housing - jobs balance and ability to minimize the need for out-commuting) would be strengthened. Under this option, Sudbury / Great Cornard would make by far the largest contribution to meeting the RSS housing target figures.
- 4.11. Hadleigh would receive a far lower scale of new development than Sudbury / Great Cornard but would most probably still need a new development site (or smaller sites) to be found for the town's edge(s). Some of the new housing could be expected to be accommodated on sites within the town but it is likely that much would need to be accommodated on new urban edge, greenfield sites. The town's role as a small market town would be maintained and reinforced slightly and the accommodation of more new jobs and economic opportunities would be required to match the housing growth. Hadleigh would remain as Sudbury / Cornard's much smaller neighbour but its degree of self-containment (including housing - jobs balance and ability to minimize the need for out-commuting) thereby remaining less self-contained than Sudbury/Gt Cornard.
- 4.12. Key Service Centres and Ipswich Policy Area (Ipswich Fringe/ IPA) is an area where the current Local Plan takes a relatively restrictive stance towards further large-scale residential development on any substantial scale. This is partly because significant residential development already took place here when large parts of Pinewood were developed in the recent past. In addition, the Babergh part of this area is constrained and there is relatively little land available within the A14, which acts as a buffer to new development. This approach could provide for about three quarters or all of the number of homes planned for this part of Babergh by the RSS (to 2021) if some further development is planned and allocated here until 2021. However, it also allows for some flexibility between here and these rural areas (see below). The IPA would need to accommodate the majority of the IPA / rural areas share to remain in line with RSS guidelines beyond 2021. Accordingly, it would probably be necessary to identify a new site to meet the RSS requirements from 2021 to 2027. The key service centres would include those larger villages in the district that meet the criteria of the adopted regional Plan, in relation to having the benefit of local facilities, services and local employment opportunities. Under any of these alternative options, these would need to accommodate the majority of all new development planned for the rural areas beyond Babergh's two market towns and the urban Ipswich fringe (as the best suited locations). This option would require a low rate of further growth from about 2018 to 2021 and onwards. The protection of existing village services / facilities would be necessary.
- 4.13. Other / Smaller Villages Under this approach these locations that do not meet the requirements of 'Key Service Centres' above are subject to prevailing planning policy at national and regional levels. These require us to take a restrictive approach towards new development overall in the interests of sustainability. New housing would in principle be delivered only at a scale dictated by local housing needs and be mostly affordable housing. This could take the form of infilling within the existing village limits, or redevelopment of other sites, on the occasional basis when such sites come forward. Rural exceptions affordable

housing sites, usually at the village edge, would also be acceptable in principle (for villages with less than 3,000 people) where local affordable housing needs justify such development. The protection of existing village facilities and services would be necessary, alongside encouragement of new or expanded facilities and services where possible. Under this option no new housing would actually need to be provided to meet the RSS requirements.

- 4.14. Other Rural Areas / Open Countryside These areas are also subject to prevailing planning policy at national and regional levels where an even more restrictive approach towards new development applies. This is necessary not only in the interests of sustainability but also for countryside protection. Any new development would require exceptional justification and this can rarely be shown.



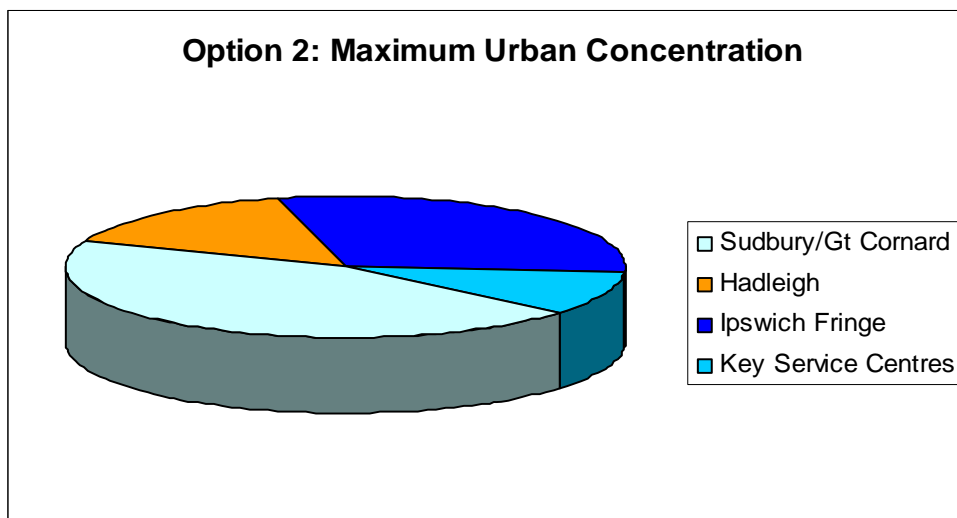
Option	Advantages	Disadvantages
Option 1: Distribution based on Local Plan Allocations	<ul style="list-style-type: none"> Development rates in market towns would not be significantly different to those achieved in recent years Affordable Housing needs the greatest in Sudbury & Great Cornard (35%) Sudbury, Hadleigh and the Ipswich Fringe have access to a range of employment opportunities, services and facilities Likely that sites would be of a scale that would deliver new facilities and infrastructure Strengthen self containment of Sudbury and Hadleigh Most new development takes place in centres where services 	<ul style="list-style-type: none"> Infrastructure constraints and new demands placed on existing infrastructure, particularly in terms of roads Allocate greenfield sites that would lead to a loss of countryside and high environmental impact High levels of commuting from rural areas to Sudbury, Hadleigh and the Ipswich Villages with good level of services would receive limited additional development to help retain them Restrict amount of affordable housing in areas other than Sudbury, Hadleigh and Ipswich fringe that would come forward

	<p>and infrastructure already exists or can be improved</p> <ul style="list-style-type: none"> ▪ Maintain character of rural settlements ▪ Viability of public transport maximised 	<p>through obligations</p> <ul style="list-style-type: none"> ▪ Do not address housing needs and need for employment opportunities across the district
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Option 2: Maximum Urban Concentration

- 4.15. This approach focuses strongly on pure sustainability considerations and presents the option based upon maximum concentration of new development upon the district's (limited number of) urban areas. It meets and indeed considerably exceeds the RSS apportionment for the Ipswich fringe, promotes the role of Sudbury / Great Cornard as the district's largest centre and assigns significant growth to Hadleigh. The rural areas (and particularly Key Service Centres) would see minimal growth and change.
- 4.16. Sudbury / Great Cornard this area would receive a larger share of development than the others and its role would remain as the district's main centre. However, development would be spread more evenly and the area would receive far less development than under the approach of Option 1. A significant new urban edge greenfield development site (or perhaps two smaller developments) would probably have to be identified.
- 4.17. Hadleigh would be the location of a higher proportion of development than it currently has planned (under the Local Plan). However, it would still be one third of the number of houses allocated to Sudbury / Great Cornard. This could be expected to require a new relatively large greenfield site at the edge of the town. The town's role would not be changed from its current position. Some growth in the current level of jobs would be necessary to ensure that housing growth is sustainable and to limit out-commuting.
- 4.18. Ipswich Policy Area (Ipswich Fringe) under this approach, the Ipswich fringe would receive a higher proportion of new development than under any other option and would accommodate nearly a third of all new development for Babergh from around 2018 to the end of the Plan period. A large new Greenfield site (or two medium sized sites) would be needed to allow for this growth and this would need to be within the area bounded by the A14, in order to ensure that new development adjoins the existing the existing urban area and does not engulf the villages beyond the A14. This growth would accelerate the current level of growth planned for this area by about 50%.
- 4.19. Key Service Centres the larger villages of Babergh under this approach would receive relatively little new development from about 2018 and this would be quite straightforward to accommodate. Probably no new land allocations would be necessary, with the villages only having to accommodate around about 20 houses per year between a relatively large number of locations. This would represent a slowing down of current development levels and the development of rural exceptions sites for affordable housing would probably be sufficient to meet this level of growth.

- 4.20. Other Rural Areas / Open Countryside these areas would not need to contribute to meeting the district's housing requirements at all.



Option	Advantages	Disadvantages
Option 2 : Urban concentration	<ul style="list-style-type: none"> Affordable Housing needs the greatest in Sudbury & Great Cornard (35%) Growth would be in Sudbury, Hadleigh and the Ipswich Fringe which have access to a range of employment opportunities, services and facilities and could potentially be improved Likely that sites would be of a scale that would deliver new facilities and infrastructure Strengthen self containment of Sudbury and Hadleigh Maintain character of rural settlements Viability of public transport maximised 	<ul style="list-style-type: none"> Development rates in market towns would be much higher than those achieved in recent years Infrastructure constraints and new demands placed on existing infrastructure, particularly in terms of roads Allocate large greenfield sites that would lead to a loss of countryside and high environmental impact The villages with some level of services would not receive additional development to help retain them Focussing development at Sudbury, Hadleigh and the Ipswich fringe could increase levels of out commuting from smaller centres to Sudbury, Hadleigh and Ipswich fringe Restrict amount of affordable housing in areas other than Sudbury, Hadleigh and Ipswich fringe that would come forward through obligations Do not address housing needs and need for employment opportunities across the district

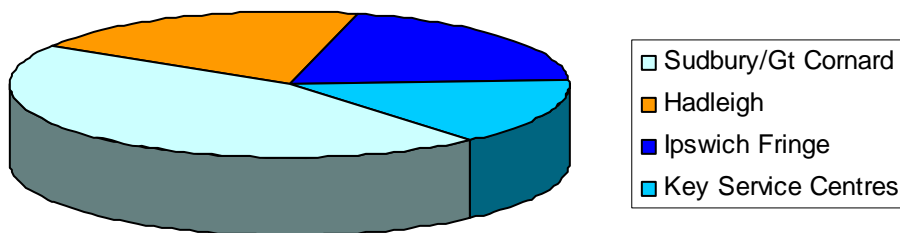
Option 3: Equitable Dispersion

- 4.21. This approach takes into account the need to meet RSS targets for each area, but also emphasizes the capacity of each area and minimizes the concentration of new development upon any single location in the district.
- 4.22. Sudbury / Great Cornard would still be the focus of development, accommodating the largest share but the scale of this share would be reduced very significantly. Growth would be at a lower level than in the past. Its level of growth would still be relatively substantial – at approaching 50% of the district's needs (excluding those for the IPA) and accordingly the level of matching growth in jobs, the economy, facilities / services and infrastructure would need to be similarly substantial. It would still probably require the identification of one new strategic scale, urban edge, development site. Sudbury / Great Cornard's role as the district's main centre would be continued and re-affirmed.
- 4.23. Hadleigh would be in a relatively similar position as that suggested at Option 1 but this option allocates a larger share of the district's development. The growth requirements are double that of Option 1 and accordingly much more urban edge, Greenfield land would be needed. The town's role could be promoted as a slightly larger (market town) whilst retaining Hadleigh's current role as second largest in the district. Opportunities to improve self-containment would be greater.
- 4.24. Ipswich Policy Area (Ipswich Fringe) would also receive much higher growth than under Option 1 (level at least doubled). The RSS housing allocation would be met both up to 2021 and 2027 (or 2031) and slightly exceeded overall. Two new Greenfield sites would probably be needed, one on each side of 2021, to meet / exceed the RSS housing allocation.
- 4.25. Key Service Centres The role of these in providing for meeting the district growth figures would be much greater than under Option 1. However, there is the opportunity to spread this across a relatively large number of locations. This spread would be recommended, as far as practically possible, so as to ensure much of the benefit of this overall growth option and in line with its dispersal ethos. The approach would be highly unlikely to change the role or character of any one settlement materially, given this recommended dispersal across locations.
- It should be noted that the potential redevelopment of known, large, brownfield sites in some such villages could perhaps alter the role and character of those settlements. Whether such redevelopment proposals are to be acceptable or not is a planning decision to be made on the individual merits of those cases and the principle of redevelopment has already been established. The potential redevelopment of these sites should not be confused with the merits of this overall strategy (which does not hinge on the outcomes of those decisions).*

Other / Smaller Villages Approach as Option 1.

Other Rural Areas / Open Countryside Approach as Option 1.

Option 3: Equitable Dispersion



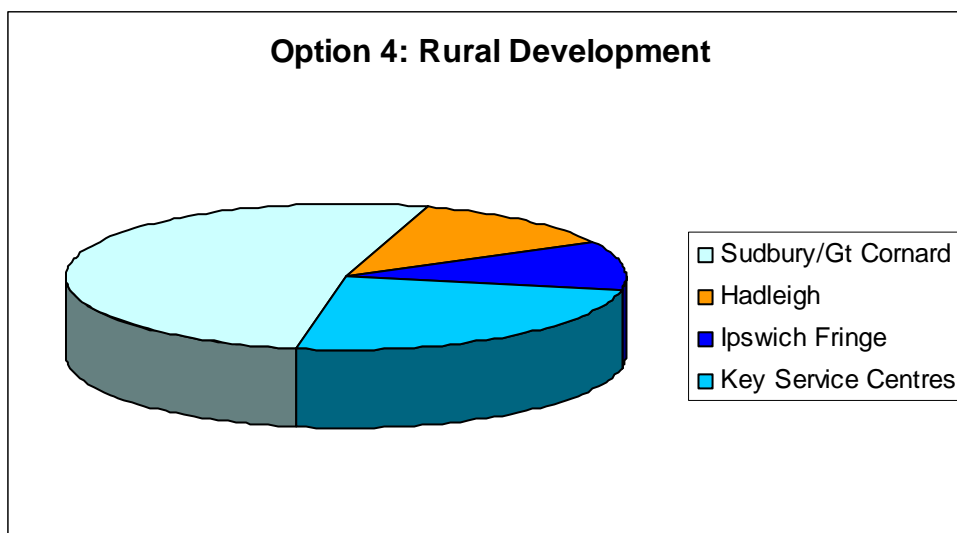
Option	Advantages	Disadvantages
Option 3: Equitable Dispersion	<ul style="list-style-type: none"> Provide for affordable housing needs across the district as a result of planning obligations Meet housing demands across the district and the need for job opportunities Spread environmental impacts throughout the district rather than concentrating it at a few locations Greater choice in terms of housing and employment opportunities in the district and less reliance upon a few locations Less commuting from other parts of the district to a few centres within the district Villages with some level of services would receive additional development to help retain them Likely that sites would be of a scale that would deliver new facilities and infrastructure 	<ul style="list-style-type: none"> Allocate greenfield sites throughout the district and this would lead to a loss of countryside Less affordable housing in Sudbury where need is the highest Increase in traffic on some rural roads Infrastructure constraints, this could be a particular consideration in smaller villages

Option 4: Rural Development

- 4.26. This approach would see the larger villages make a greater contribution to meeting district needs, with a similarly reduced reliance upon the 2 market towns and Ipswich fringe.
- 4.27. Sudbury / Great Cornard would receive the largest single share of development but experience much less growth than in the past – as provided for under the current Local Plan. A slightly smaller scale of new urban edge, greenfield site

and similar supporting development would be required as those for Option 2. As with all options, the town's role would be continued as district centre.

- 4.28. Hadleigh would also see its current role maintained. Urban edge, greenfield land would be required and the prospects for self-containment perhaps improved marginally. Matching employment growth and that of services / facilities would be needed. Growth would be higher than the level planned for in the current Local Plan.
- 4.29. Ipswich Policy Area (Ipswich Fringe) This option allocates the amount of growth expected under the regional Plan, allowing for both the periods pre and post 2021. This would be higher than that allocated in the current Plan and compensate for the anticipated shortfall to 2021. However, the current Plan took earlier and other separate developments into account, so the real difference is not so great. Two new greenfield sites would probably be required, one before 2021 and another after.
- 4.30. Key Service Centres these could collectively make a substantial contribution to district housing needs at a level that would not necessitate considerable growth in local jobs, facilities or services, or infrastructure. The retention / maintenance these would be essential though and where required, improvement / growth. Some of the growth will be able to take place on sites in the villages that emerge but generally, it will be necessary to identify new sites at edges of villages as brownfield or other sites are seldom available in these villages.
- 4.31. Other / Smaller Villages although no overall change of approach is suggested for these, and no material contribution towards meeting district needs is likely, these could have a role in supporting the locations above. This could also provide flexibility and added certainty to ensuring the success of a rural focused strategy. Appropriate locations of this kind could also help ensure a good spread of development around the district and the delivery of housing for local needs for constrained locations (such as AONBs).
- 4.32. Other Rural Areas / Open Countryside no change of approach appropriate

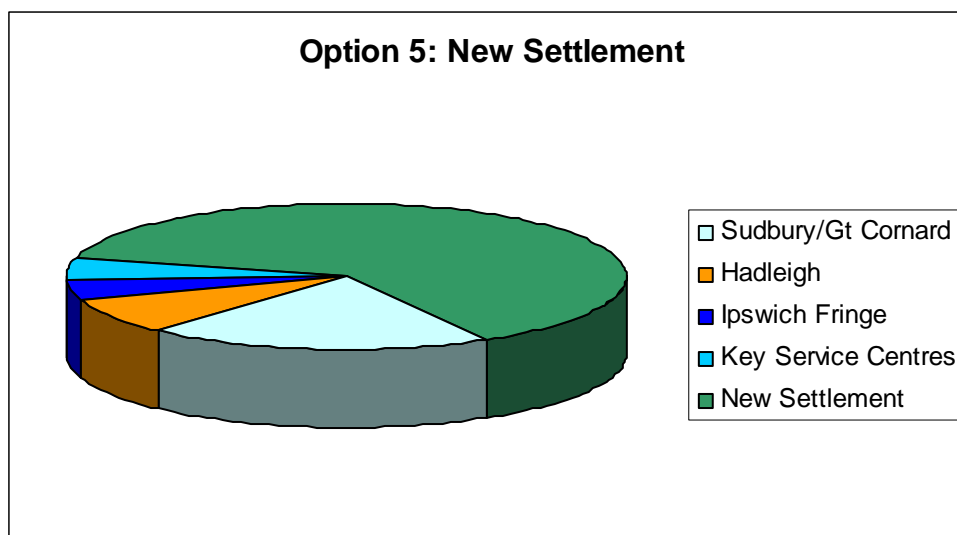


Option	Advantages	Disadvantages
Option 4: Rural Development	<ul style="list-style-type: none"> ▪ Provide for affordable housing needs across the district as a result of planning obligations ▪ Meet housing demands across the district and the need for job opportunities ▪ Spread environmental impacts throughout the district rather than concentrating it at a few locations ▪ Greater choice in terms of housing and employment opportunities in the district and less reliance upon a few locations 	<ul style="list-style-type: none"> ▪ Allocate greenfield sites throughout the district and this would lead to a loss of countryside and high environmental impact ▪ Less affordable housing in Sudbury where need is the highest ▪ Increase in traffic on some rural roads ▪ Sites not be strategic enough to contribute to community benefit ▪ Scale of growth in settlements not sufficient to contribute to the viability of services and facilities ▪ Viability of public transport would be questionable ▪ Infrastructure constraints, this could be a particular consideration in smaller villages ▪ Adverse impact on character of rural villages

Option 5: New Settlement

- 4.33. Under this option a completely new, small community of somewhere initially in the region of 1,000 – 1,500 new homes (but allowing for a greater level of future growth for future Plan periods, including to 2031 and beyond) could accommodate the vast majority of the new homes needed in the district. At only 1,000 – 1,500 dwellings, the development would not be realistic and this could only be pursued if a longer time period and much larger new settlement is planned for. This would have to be matched by the same scale of new jobs and all other supporting development, including jobs, facilities, services and infrastructure of all 3 kinds. This option could also only be possible in the latter part of the Plan period, given the inevitable long lead-in time involved. If pursued in this way, it would allow for a relatively low level of housing development in the interim period (around 2018 – 2021) at a level sufficient to meet pressing housing needs and maintenance / growth of jobs and the economy. This development approach would not be in accordance with the current RSS but could be contemplated if the emerging RSS review creates favourable conditions for such an approach.
- 4.34. Sudbury / Great Cornard and adjoining areas would receive far lower growth than in the recent past over the latter part of the Plan period, from 2018 to 2027 (or 2031). In the early part of the period, the level of growth would be likely to be relatively similar to recent years. The identification of new sites at the town's edge would not be necessary. The town's role would not change and it would remain as the district's main centre in all respects.

- 4.35. Hadleigh would receive lower growth levels than those of the past and than what is planned for 2008-2018, for the latter Plan period years. The modest growth level would need to be matched by a commensurate (modest) growth in jobs, the economy, services, facilities and infrastructure. By 2018 sufficient sites will most probably emerge in the town to negate the need to find any new land around the town's edges. Hadleigh's role would not change and it would remain as the district's second market town and centre of population.
- 4.36. Ipswich Policy Area (Ipswich Fringe) This approach would provide for three quarters (or otherwise all) of the number of homes planned for this part of Babergh by the regional Plan (to 2021) and /or the current RSS development level post 2021, depending upon progress of the new settlement. Either way, finding a new Greenfield site to provide for the period up to / beyond 2021 would be necessary. The new settlement approach would indicate a reduced need to adhere rigidly to the RSS growth here and this lower development level could be applied before or after 2021.
- 4.37. Key Service Centres would need to collectively accommodate beyond 2018 / 2021 only a half of what the current Local Plan allocates to these areas. Development could be spread thinly, with minimal impact, across a number of locations throughout the district. The protection of existing village services would be necessary.
- 4.38. Other / Smaller Villages Under this approach no new housing would need to be provided in these locations to meet the RSS requirements (but the emphasis would be on meeting local needs – throughout the Plan period).
- 4.39. Other Rural Areas / Open Countryside Approach as before.



Option	Advantages	Disadvantages
Option 5: New Settlement	<ul style="list-style-type: none"> Maintain character of rural villages and market towns New development would be of a 	<ul style="list-style-type: none"> The villages with some level of services would not receive additional development to help

	<p>scale that would deliver new facilities and infrastructure</p> <ul style="list-style-type: none"> ▪ Viability of public transport maximised ▪ Reduce pressure for allocation of Greenfield sites in market towns and villages ▪ Provide opportunity for sustainability principles to be included in the construction of the new settlement 	<p>retain them</p> <ul style="list-style-type: none"> ▪ Do not address housing needs and need for employment opportunities across the district ▪ Vitality and viability of new settlement is not a given and this could lead to high levels of out-commuting
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Question SS1: Please state your preference(s) on these options, ranking them from 1 to 4, with 1 for your greatest preference and 5 for your least favoured approach

Please give reasons for your choices

Question SS2: Are there any other options / approaches that you consider would be preferable, as well as viable, realistic and deliverable (and beyond minor variations of these options)?

Housing (and other) Development in Rural Areas

- 4.40. The above spatial strategy deals with large scale housing to meet the relatively substantial numbers of dwellings that will be required in Babergh in future, over a 15 – 20 year timespan. Accordingly, that section is concerned with defining a strategy on where to allocate significant new numbers of housing to meet the vast majority of our future housing requirements. The vital distinction to draw between the last section and this one is that this section is concerned with defining the appropriate planning policy framework for how the council should respond to housing development proposals in rural areas. In the interests of sustainability, the environment, local infrastructure, facilities and services it is not proposed to radically change the existing policy position to a new context whereby the rural areas of Babergh would accommodate a large share of the district's housing needs – when considering the housing numbers involved (please see table below).
- 4.41. This issue is often contentious and it generates greatly contrasting views. It is considered necessary to set an appropriate and clear policy framework for determining how much development Babergh's rural areas should accommodate in future. At present there is a 3-tier approach as follows:
1. Sustainable Villages (mostly the larger villages with a range of facilities / services, job opportunities and / or reasonable public transport provision)
 2. Unsustainable Villages (mostly the smaller villages, generally lacking the above advantages)
 3. Open countryside (including very small villages / hamlets, clusters of housing, individual houses, and undeveloped areas)

- 4.42. Housing development in the larger / sustainable villages is currently permitted in groups of unlimited size and housing developments of various sizes are allocated on sites identified in the Local Plan. In addition, rural affordable housing exception sites villages are also possible for villages with a population of less than 3,000 people (the vast majority of Babergh's villages). Housing development in these rural areas is restricted to infilling by groups within the village confines (and defined boundaries) to a scale of 3 houses in the unsustainable villages. However, in practice, large sites rarely exist in any case. Development outside the 2 categories of villages is unacceptable (except for small affordable housing only schemes).
- 4.43. Work has been carried out to review which villages should be in the sustainable villages category in future and those to be in the unsustainable villages category, to ensure that these remain up-to-date. These will be set out in a subsequent development plan document (DPD). Babergh's approach needs to be logical, consistent and in line with planning policy at national and regional levels, unless there are specific local circumstances of sufficient stature to warrant departing from this.

Question SS3: Do you think that there is a need to change the above approach in any substantive way (beyond minor details) in respect of either sustainable villages or unsustainable villages?

If so, how would you suggest this approach to rural housing development should be changed?

Please give reasons for your answers

Question SS4: If the current Local Plan policy approach is to be changed please indicate what level of housing development that you consider would be appropriate for the smaller / unsustainable villages – according to the 4 options outlined below.

Please give reasons for your answer

Option 1: no change – development in groups up to 3 dwellings

Option 2: limited change – development permitted in groups to 5-6 dwellings

Option 3: greater change – development permitted in groups up to 10-12 dwellings

Option 4: maximum change – development permitted in groups up to 15 dwellings

Question SS5: Bearing in mind the need for a rational / consistent approach, are there any particular rural locations that you consider should either receive or be precluded from further housing development, where this may not appear to be in accordance with prevailing planning policy?

Please give reasons for your ideas

- 4.44. The largest villages in Babergh (which have a development of 3,000 people or more) currently face a difficult problem in that the use of rural affordable housing sites in these locations is not possible, as any new houses built of these kind would be subject to the right to buy and thus the houses would not remain

affordable in perpetuity. It is therefore necessary to consider a different way of delivering affordable housing for these locations. One approach would be to allocate new sites that could be either for open market housing with an element of affordable housing or to allocate sites entirely for affordable housing – subject to the availability of privately owned sites coming forwards – which cannot be guaranteed.

Option 1: Allocate sites including open market housing and affordable housing together – possibly with a higher percentage of affordable housing than other allocated housing sites

Option 2: Allocate sites for affordable housing only

Option 3: Any other approach – please offer suggestions

Question SS6: What do you consider would be the most appropriate way of delivering new affordable housing in Babergh's largest villages that cannot benefit from rural exceptions affordable housing sites?

Meeting Housing Growth

- 4.45. Babergh is required to provide at least 5,600 dwellings under the recently adopted regional Plan from 2001 – 2021. The district allocation is envisaged to provide 600 in the Ipswich Policy Area and 5,000 for the remainder of Babergh district. This means delivering 280 net new homes per year on average (including 30 in the IPA). For the period after 2021, the current requirement is to plan for this level, plus the annual rate calculated when any previous delivery shortfall is taken into account. The Council is required to plan for housing delivery for at least a 15-year period in new Plans. Accordingly, this Core Strategy looks to 2027, given its expected date of adoption in 2011 and allowing a one-year period for any contingencies. The Core Strategy also needs to have regard to the period to 2031, as the RSS is being reviewed in parallel and rolled forward to 2031. The Core Strategy will address all these considerations.
- 4.46. Housing delivery is closely monitored through the Annual Monitoring Report and managed as far as possible. This report therefore draws upon the latest report – for the year 2007-8 and results / findings for 2008-9 will be incorporated at the next stage of the Core Strategy. The latest AMR shows that we must plan for 287 dwellings per year for Babergh over the new Plan period, since delivery to date has been close to (but just under) the RSS levels. For the IPA, housing delivery has been slightly in excess of the level that the RSS indicates. Delivery is expected to drop in the next few years, due to the current adverse economic conditions. Recovery in the economy, housing market and delivery is anticipated within a few years from now (although of course, this is uncertain). At present, therefore, it is certainly a possibility (if not likelihood) that the district's very healthy current housing land supply will last for longer than the 10-year period (2018-19) that we know it can currently provide for. The Core Strategy's primary purpose, therefore, is to set out a clear development strategy for the years beyond then to 2027 / 2031.

This table sets out the position on housing requirements and past delivery, relying upon data collected for the latest AMR (as of 1st April 2008):

1	RSS requirement 2001 – 2021			5,600 (5,000 + 600)
2	Number built already (2001 - 2008)		1,870	
3	To provide 2008-2021			3,730
4	Annual Provision 2008-2021 / 2027		287	
5	To provide 2008-2027	287 x 19 years		5450
6	Commitments		1,210	
7	Remaining Plan site allocations		1,740	
8	Total		2,950	
9	Residual (to provide 2008-2027)			2,500
10	Allowance for 'windfalls' from 2021 - 2027	96 x 6 years	570 (round to 500)	
11	Sum to plan for / allocate			2000

4.47. Although the housing requirements can be calculated quite easily and precisely starting from the RSS allocations and applying all the known elements of housing supply, the RSS requirements are cited as minima to be achieved, rather than ceilings not to exceed. It is therefore necessary to consider what the most appropriate level of supply would be to plan for.

4.48. On the one hand, there may be potential benefits, such as increasing the general affordability of housing (as is the Government's view) and delivering a greater amount of affordable housing, 'on the back of' more open market housing. This may also provide greater flexibility and a greater chance of ensuring that minimum delivery figures are met. On the other, it may be that planning / allocating more supply has no real prospect or guarantee of higher delivery. In addition, it may be the case that merely increasing supply overall would be less effective than focusing efforts on delivery of affordable housing only, as could be the case in current economic conditions. Whichever approach is chosen, careful regard needs to be paid to ensuring that delivery is appropriate in relation to economic and jobs growth; plus capacities of the environment, infrastructure and local communities to absorb / assimilate new development. Otherwise we would fail to deliver sustainable growth and conflict with the over-arching objective of the planning system, long-established planning policy at all levels and this Plan.

Question SS7: Should this Plan aim to provide for the adopted RSS housing numbers (280 / 287 per year) or otherwise less or more than these numbers?

Please state why and give justification / evidence for your answer

- 4.49. Please note that a housing development trajectory will be produced in a subsequent version of this document when broad parameters and key issues / questions have progressed further towards resolution.

Brownfield Land Use

- 4.50. Although this has often been seen primarily as a requirement for housing development there appears no reason why this should not apply equally to all development, including new employment / commercial and other forms of development. Nationally, a target is set that at least 60% of new housing should be built on previously developed land. The regional Plan also uses this same target. Consideration needs to be given to whether this applies appropriately to the local Babergh context or whether a different local target should be set. The prioritization of brownfield land development has caused some problematic issues in the Babergh district, as it has led to significant pressure to redevelop the district's scarce employment land supply for residential redevelopment. In addition, it can involve greater issues of financial viability associated with preparing sites for development that casts the delivery of affordable housing in doubt.

Question SS8: how great a priority do you consider should be attached to developing brownfield land before greenfield land?

Question SS9: Do you consider that the Babergh target for development on brownfield land should accord with national and regional targets of 60% or be set either lower or higher?

Question SS10: Do you consider that this should apply in the same way to all other new development (and if so, at the same target level)?

Please state why and give justification / evidence for your answer

- 4.51. A brownfield land development trajectory will be produced in subsequent more detailed development plan documents (DPDs) when the likely distribution of development has been established.

5. Housing

5.1. A good level of policy and guidance is provided to frame Babergh's approach to housing issues for the district, including national planning policy / guidance (PPS3 and related papers) and the regional Plan. The current adopted Local Plan also deals with a lot of detailed housing matters and it is considered that not all of this will need addressing or changing in the Core Strategy.

Key evidence base research studies for these themes are:

- Housing Needs Survey 2008
- Strategic Housing Market Assessment (and associated viability study) 2008/9
- Strategic Housing Land Availability Assessment 2009
- Infrastructure Capacity Study 2008/9

Turning to local perspectives on this matter, the Sustainable Community Strategies and other local consultation have the following implications for and links to the district's key housing issues.



Suffolk LSP	Western Suffolk LSP	Babergh East LSP	BDC Strategic Plan
<p>A prosperous and vibrant economy Affordable, quality housing for all</p> <p>The Greenest County Reduce Suffolk's carbon footprint and adapt to the changing climate</p> <p>Safe, healthy and inclusive communities</p> <p>A sense of belonging within communities that are valued, engaged and supported Cohesive Communities</p>	<p>Develop and maintain a safe, strong and sustainable community</p> <p>Create and support healthier communities</p> <p>Make Western Suffolk a safer place and build a stronger community</p> <p>Protect our natural environment and local biodiversity and ensure sustainable development</p>	<p>Maintaining the quality of the environment</p> <p>Affordable housing</p> <p>Provision and retention of employment sites to encourage economic development (including tourism)</p>	<p>A greener and cleaner Babergh The right balance between protecting the natural environment and supporting development opportunities for the area and its people A smaller carbon footprint for the area</p> <p>Quality homes that local people can afford There are enough good quality homes which meet high environmental and sustainability standards to meet the needs of the people of Babergh. There are enough affordable homes to meet the needs of the people of Babergh. New housing developments are supported by adequate infrastructure improvements Fewer people are homeless</p> <p>Vibrant places and strong communities</p>

			<p>Reduce impact of rural isolation, particularly limited access to affordable housing, transport and jobs</p> <p>Active villages and communities</p> <p>Individuals have a sense of belonging within cohesive communities where everyone is valued</p>
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Housing Development Density

- 5.2. This is considered to be a detailed matter requiring address within subsequent (development plan) documents.

House Types and Sizes

- 5.3. This is an important matter in relation to ensuring that the right kind of housing is provided to meet the needs of Babergh's communities. This applies equally to open market housing and affordable housing. The established principle is that all new developments should provide an appropriate mix of dwelling types and sizes and thereby meet the needs of the local community. Babergh's evidence does not suggest any reason to depart from this established position and sets out the types and sizes of housing that are required. Current housing markets are not fully balanced and particular dwelling types and sizes are under-represented. Across all 3 tenure types (market, intermediate affordable and social rented affordable) Babergh's evidence shows that the greatest requirements are for small and medium sized dwellings.
- 5.4. It would seem appropriate to include a policy requirement within the Core Strategy dealing with the above matter. This would require housing provision in all but the very smallest developments to meet identified needs in terms of dwelling type and size. The alternative is to either not include a policy or 'delegate' the matter to a subsequent development plan document (DPD).

Question H1: Do you agree that the Core Strategy should address this matter through a specific policy or not and if so, do you consider that the above approach is reasonable?

Please give your reasons

Affordable Housing Provision

- 5.5. This has been a key issue for Babergh and can be expected to remain as such for the Plan period, even under the currently difficult economic conditions. Incomes in relation to house prices continue to mean that affordability remains a problem, regardless of how far the overall volume of housing supply determines this or not. For the purposes of this document, the definition of affordable housing will be that set out in national planning policy (PPS3, November 2006)- see glossary.

- 5.6. The Council has an enviable track record in affordable housing delivery and has used a variety of effective approaches towards this end. These include policies to require affordable housing alongside open market housing and a rural affordable housing exceptions site policy. We are required to set out an overall target for affordable housing provision for the Plan period.
- 5.7. Babergh has just concluded its last affordable housing delivery programme covering the 5-year period from 2004/5 to 2008/9. This was successful in bringing forward 700 new affordable homes in the delivery pipeline (defined as either completed, under construction or with planning permission). The Council has developed a similar new programme for the next 5-year period from 2009 – 2014, with a target of 500 new homes (this being set lower to recognize the constraints of current prevailing conditions).
- 5.8. Given the above, a target could be set for the Plan period of 2011 – 2027 (16 years) with regard to the 2 programmes above and their respective targets of 500 or 700 new dwellings per 5-year period. This will need careful planning, monitoring and review in the light of experience and changing conditions but a guide target figure would be a useful measure to set, with appropriate delivery strategies and measures for implementation. Please note that whilst it is necessary to aim to deliver as much extra affordable housing as possible, it is also important that a realistic and achievable target is set. This explains why the target for the Council's earlier programme was set at 700 new homes and the current programme's target has been set at 500 new homes.

Question H2: Do you consider that Babergh should set a Plan period affordable housing provision target based upon the above approaches or other approaches:

Option 1: A target of less than 500 new affordable homes per 5-year period

Option 2: A target of 500 new affordable homes per 5-year period

Option 3: A target of 600 new affordable homes per 5-year period

Option 4: A target of 700 new affordable homes per 5-year period

Option 5: A target of more than 700 new affordable homes per 5-year period

Please give reasons / evidence for your answer

Affordable Housing Tenures

- 5.9. Babergh's current evidence suggests that the overall split of new affordable housing should be 75% for 'social rented' housing and 25% for other, 'intermediate' tenure types of affordable housing

Question H3: Do you agree with the above proportions?

Would you propose a different split and if so, why?

Affordable Housing Requirements: Site Development Thresholds and Percentages

5.10. Babergh's existing policies require:

Up to 35% Affordable Housing provision in urban areas (developments / sites of 15 units or 0.5 ha. upwards) and

Up to 35% Affordable Housing provision in rural areas (applied to developments / sites of 3 units upwards, regardless of site area)

5.11. The available evidence does not recommend change for the current Local Plan rural Affordable Housing provision site policy. However, the latest evidence indicates that the Affordable Housing provision policy for urban areas requires revision. This is because evidence shows that too many developments occur below the 15 unit threshold, thereby providing no affordable housing at all. This impacts on the new supply of affordable housing and works against the creation of mixed, balanced communities. The evidence therefore recommends lowering the size of site at which provision should be made and increasing the percentage required to 40%.

Question H4: Do you consider that Babergh should increase the amount of affordable housing required under its urban Affordable Housing provision policy to 40%? Alternatively, should the Council choose to:

Option 1: reduce the percentage required to below 35%?

Option 2: leave it at 35%?

Option 3: or increase it above 40%?

Please give reasons / evidence for your answer

5.12. A related question to resolve is that of setting the size / scale of urban developments and sites where a requirement for affordable housing would arise. There is a national indicative minimum site size threshold of 15 dwellings. However, Babergh's circumstances suggest that consideration should be given to a different approach. Also, there is scope to set out differing percentage requirements and thresholds for differing scales of development proposals in different types of locations.

Question H5: Do you think that Babergh should set different minimum site size thresholds at which affordable housing provision will be required from the national indicative (and current Local Plan) site size?

If so, would you support Option 1, Option 2 or an alternative option?

Option 1: A possible approach could be to require a lower percentage of provision on smaller developments falling below the current 15 unit level. In this way, there could be a lower percentage requirement for developments from 10 to 14 units and a further, lower percentage requirement for developments from 5 to 9 units.

Option 2: An alternative would be to keep a standard percentage requirement (at 40%, given the latest evidence) and to lower the thresholds at which provision would be required.

Rural Affordable Housing Provision

- 5.13. Traditionally, this has been largely brought forward through use of a rural exceptions affordable housing policy, although more recently also through the Local Plan policy that requires affordable housing alongside market housing in rural developments. The indications are that the latter appears to have been sufficiently well refined and applied. However, national and regional planning policy and consultations, together with local community priorities, indicate that Babergh's approach to rural affordable housing provision may benefit from revision. This is primarily because affordable housing needs still arise in smaller villages, as do opportunities to meet that need and there remains a pressing need to increase the overall supply of affordable housing.
- 5.14. It is not possible or appropriate to revise some parameters of the existing rural exception sites policy, including that exceptions sites can only be developed for smaller villages; that the housing should be only affordable housing; and the need for the housing to be provided in perpetuity. However, there could be room for revising and relaxing the policy to allow for relatively small groups of affordable housing in smaller villages that have no built up area boundary (BUAB). The scale of development, as now, would be determined primarily by the scale of locally identified affordable housing need. There is usually considerable difficulty in finding and securing sites for rural exceptions sites, particularly in terms of availability, due to a 'hope value' (for open market housing) factor among landowners holding land adjoining village boundaries. This problem may be partly overcome by revising the current rigid requirement for rural exceptions sites to be located adjoining village boundaries. Development for affordable housing in the countryside would still need to be controlled, however. This could be done through a requirement for a sequential approach to site selection and for sites to still be well related to existing villages and acceptable in relation to site location, design, layout, landscaping, etc.

Question H6: Do you agree that the use of rural exceptions affordable housing developments in groups is appropriate for smaller villages (without a BUAB)?

Please give reasons for your answer

Question H7: Do you agree that the current rigid requirement for rural exceptions sites to be located immediately adjacent to village boundaries should be relaxed, as suggested above, with suitable safeguards retained, to ensure effective control over development?

Gypsies, Travellers and Travelling Showpeoples' Accommodation

- 5.15. These groups have their own specific accommodation requirements and the Government requires the Council to address these. Babergh currently has no authorized sites for these groups. A recent study covering Babergh (and several

other Suffolk districts) in 2007 suggested that there are virtually no accommodation requirements of these kinds within Babergh. The level of need suggested for Babergh by this work has already been met by the grant of planning permission for a single residential caravan in 2008. However, nationally and regionally there are identified shortages of authorized sites.

- 5.16. In response a single issue review of the Regional Plan is being produced specifically to address this issue. The strategy for this hinges on a substantial regional redistribution of accommodation sites for Gypsies, Travellers and Travelling Showpeople. If approved, the Plan revision would mean that every district in the region contributes towards these accommodation needs (with a minimum of 15 pitches per district). Although this Plan is not yet approved, it seems likely that this will result in a requirement for Babergh to accommodate a site (or sites) sufficient to provide for 15 pitches by 2011 (each pitch being adequate to accommodate a calculated 1.7 caravans on average).
- 5.17. Thus, Babergh seems likely to require 15 pitches by the time this Core Strategy is adopted. Given this anticipated requirement by 2011, the initial 15 pitch requirement for the scale of Babergh does not represent an issue that this Core Strategy needs to address by site allocation. A combination of the adopted regional plan policy (H3); together with its emerging replacement policies (H4 and H4A); the government circulars ODPM 01/2006 and 04/2007; and the existing Local Plan Policy HS42, provide the most expedient basis to provide for the short term pitch requirements. The 'plan, monitor, manage' approach will be used to confirm whether this initial provision has been delivered by 2011 and the appropriate action taken at that time, if any change in approach proves necessary.
- 5.18. In addition, the emerging Regional Plan revision seems likely to result in a further requirement for a total of 20 'Transit' pitches (non permanent residential sites) for the whole of Suffolk by 2011. There is no prescription as to where this should be situated but locational guidance to provide for a site in each of the south and north of the county. This requirement will be best dealt with by joint working and initiatives by the Suffolk district councils and Suffolk County Council. It appears unlikely at present that these Transit sites will be allocated but more likely identified and / or promoted by the local authorities. However, research will be necessary first to establish the scale of these sites and where they should be situated.
- 5.19. This requirement does not make a specific response in this Core Strategy imperative, although the results of the above mentioned research may shed new light on the matter. Currently available evidence (as of late 2008) suggests virtually no requirement for Babergh (1 pitch). It is therefore considered feasible that this level of provision could be approached jointly with other districts and provided as part of a larger site, possibly within an appropriate adjoining district.
- 5.20. The third element of provision likely to be required is that of 9 plots of land by 2011 for Travelling Showpeople, again to be planned and provided on a county-wide basis. The emerging policy provides loose locational guidance in that this specific form of provision is anticipated for Suffolk Coastal district 'and elsewhere'. The same joint working approach as that above for transit sites would be the appropriate means of delivery. Beyond 2011 an annual compound increase of 1.5% in plot numbers would be planned for and delivered in the same way.

Evidence on this matter (from the Showmen's Guild of Great Britain, late 2008) identified no families of Travelling Showpeople currently residing in Babergh. Accordingly, it did not identify any requirement arising over the ensuing 5 years. This type of requirement does not therefore necessitate a specific response in this Core Strategy.

- 5.21. Returning to Gypsy and Traveller accommodation, beyond 2021 an annual 3% compound increase in residential pitch provision is likely to apply. Babergh is likely to need to provide for the same proportion (1.2%) of extra new regional pitches (1,038) from 2011 to 2021. This would mean a further 13 pitches to provide for during the first 10 years of this Core Strategy period. Therefore, this is the key issue for this Core Strategy to address in relation to this subject.
- 5.22. In terms of locational factors for new site provision, key considerations will include the locations where accommodation needs arise and the preferences of the various Gypsy and Traveller communities themselves. Provision could be in rural, semi-rural, urban or urban edge locations but sustainability considerations are very important, including access to facilities and services. The emerging new regional policy favours the use of major development opportunities in principle (those that include a substantial residential element, whether solely residential or mixed use schemes). Reasons given why this approach appears likely to be favoured in regional policy include that it is in line with the important objectives of social inclusion; the establishment of mixed and balanced communities; and the aim of 'mainstreaming' Gypsy and Travellers site provision, particularly in relation to the vital need to ensure affordability.
- 5.23. The options identified for the approach towards providing the further 13 pitches (from 2011 to 2021) for Babergh are as follows:
- Option 1: Plan for provision through expansion of existing sites
 - Option 2: Plan for provision through an entirely new site or sites (to be allocated)
 - Option 3: Plan for provision through a combination of the 2 approaches above (including site allocation, if required)
 - Option 4: Plan for provision through rural exceptions site policy (allowing for proposals to come forward, as exceptions to normal policies of restraint, in the same way as settled accommodation affordable housing schemes already do)
 - Option 5: Plan for provision primarily through requirements for planned Gypsy and Travellers sites wherever major developments come forward

Question H8: Which option do you favour most and which do you favour least? It would assist if you ranked the options in order of preference, with 1 indicating your greatest preference

Please give your reasons

Question H9: Are you aware of any potential sites in the district that you consider would be suitable for Gypsies and Travellers accommodation and would satisfy prevailing planning policy (in any kind of location)?

Please give clear details of the address and, ideally, the site's ownership as well

Question H10: Subject to the findings of dedicated research, do you consider that Babergh district would be an appropriate location to accommodate Transit provision for Gypsies and Travellers, to provide a part of Suffolk's overall network of Transit site provision (20 pitches likely to be required overall) from 2006-11 and beyond that date, if an increase post 2011 is needed?

Would this specific form of provision be better accommodated elsewhere in the county and if so, do you have any views or evidence as to where and why?

6. Economy & Employment

- 6.1. Babergh is an economically diverse area, with traditional retail sectors in the two towns, industrial areas at the Ipswich fringe, Sudbury, Hadleigh and Brantham and a tourism industry based around the historical villages of Long Melford, Lavenham, Kersey and the scenic Constable Country. There is a significant agricultural base, and historically, Babergh has had a relatively high proportion of manufacturing employment.

Context

- 6.2. National policy identifies the importance for economic growth and high quality environment to be considered together in order to develop sustainable economies. Emerging PPS4 places an emphasis on economic growth having regard to social and environmental considerations (including climate change). A variety of sites and properties (in terms of size, location and end use suitability) must be available to enable communities to raise productivity, provide opportunities for all people, and support a strong, stable and prosperous economy. These sites should be in the most sustainable locations and brownfield where possible. The agricultural sector also needs to be supported to enable it to be diverse and adaptable; allowing it to operate to high environmental standards where it can be sustainable, competitive and profitable for rural communities.



- 6.3. The RSS reflects national policy and places emphasis on the importance of minimising the need to travel and move goods, and where it is unavoidable, to use the most sustainable methods of transport available. It also sets out the importance of concentrating on the strengths and opportunities in areas, as well as increasing the opportunities for education and training to ensure that a skilled workforce is available. The Regional Economic Strategy sets eight strategic goals for the region to concentrate on: entrepreneurship; innovation; digital economy; resource efficiency; skills for productivity; economic participation; transport; and spatial economy, and it identifies the need for rural areas and market towns to provide employment space suitable for businesses to start up and grow.
- 6.4. One key economic aim for the County is to raise the Gross Value Added (GVA) per head of the population (*Expanding Suffolk's Horizons*), and Babergh's Economic Development Programme also identifies the need to increase the availability of managed workspaces at existing locations and to investigate new provision, particularly at Sudbury and Hadleigh. Other local targets are set out in the table below.

- 6.5. Local community priorities identified through Sustainable Community Strategies and the Babergh District Council Strategic Plan, for example developing a prosperous, vibrant and sustainable economy, have the following linkages to the economy and employment section of the Core Strategy as shown in the table below.

Transforming Suffolk 2008-2028 (Suffolk LSP)	Western Suffolk LSP	Babergh East LSP	BDC Strategic Plan
A prosperous and vibrant economy - use Suffolk's unique selling points to capture emerging markets - reduce inequalities across the country - transport and infrastructure to support sustainable growth	Develop a prosperous and sustainable economy -Alleviate poverty and reduce health inequalities -Encourage sustainable tourism	Raise opportunities for local communities to access jobs and training.	A strong and sustainable Babergh economy -sustainable economic growth - higher paid jobs taken by residents -improved infrastructure
Learning and Skills for the future - a workforce with the skills to meet the needs of Suffolk's economy - High aspirations and opportunities to realise them through quality learning opportunities	-Improve skills and learning opportunities -Encourage achievement in children and young people		A strong and sustainable Babergh economy - increased education opportunities and improved attainment

Background (Employment Land studies)

- 6.6. The District's economy is characterised by small, single location, owner occupied businesses who have been in situ for a significant length of time. Babergh has had several recent employment studies- Chesterton's Babergh specific study (2002), Donaldson's Sudbury area study (2004) and DTZ's Haven Gateway study (2005). All of the studies show that the greatest unmet demand is centred at the largest settlements- Ipswich and Sudbury, and to a lesser extent, Hadleigh, but that there is a general shortage of available commercially attractive property and land. Babergh does not have a high demand for office buildings or rented property, and there are low levels of speculative developments. There is, however, a generally high demand for serviced land and property. The 2005 DTZ study suggests that there is an oversupply of employment land, but there is no detailed qualitative demand assessment and neither the viability nor availability/deliverability of the sites was thoroughly examined. A new Employment Land Review and Strategic Sites study is being commissioned, with results expected in summer 2009. This study will combine both quantitative and qualitative assessments as well as a detailed site and market appraisals.

Employment numbers

- 6.7. In 2007, there were 41,000 jobs in Babergh (Office of National Statistics). The RSS sets a target for a net increase of 30,000 jobs in the Suffolk Haven Gateway sub-

region, but the modelling used is not detailed enough to give district specific figures. The draft RSS (figures also used in DTZ's Employment Land Study in 2005) set a target of 3,400 for Babergh out of 23,000 for the Suffolk Haven Gateway. However, this has been superseded by the adopted RSS. We will consider the job growth targets for Babergh, along with the apportionment between industries and sectors, following the work for the ELR but we are not yet in a position where we are able to provide specific targets or options relating to these.

Question EMP1: Do you agree that we should wait until the findings of the Employment Land Review are published before setting a target for employment number growth?

Question EMP2: Do you have views on what sectors or industries we should be concentrating on attracting or developing?

Question EMP3: The aim set out in the RES is for economic growth to broadly match housing growth. Do you feel that maintaining the balance of jobs and housing growth is appropriate for Babergh?
If so, what indicators do you feel would be appropriate to measure the growth (e.g. jobs/household density or jobs/population density)?
Do you think we should be setting more ambitious targets to develop a more jobs led economy rather than housing led? Would this impact on housing delivery?

Employment Land

6.8. The approach in the Local Plan has been to retain employment land as a priority (Policy EM24 and SPD on Retention of Employment Land).

Question EMP4: Do you feel that this is still the correct approach or that the policy needs revisiting? What amendments do you think need making?

6.9. It is a key priority for Babergh to ensure that a variety of land and property is available for a range of end users' needs to enable Babergh's economy to grow and to be able to provide members of the community with a range of employment and training opportunities. These sites should accommodate different uses, sizes and ambitions to allow for business start up, expansion and inward investment. Provision must also be made for training.

6.10. There is a risk of losing local facilities and services, the effects of which can be damaging to a community (often more acutely felt in the rural areas) and so it is vital that we cater for the demands for both smaller and larger sites, in a range of locations. Babergh is at risk of losing businesses and not attracting inward investment if we cannot provide the sites to meet the demand so we must ensure that sufficient land is available.

Question EMP5: Which of the following options do you support? Please indicate your reasons

Option EMP1: Maintain current allocations and seek to gain increases in land availability through extensions to the existing sites.

Option EMP2: Maintain current allocations and allocate new sites concentrated at towns and Key Service Centres

Option EMP3: Maintain existing sites and allocate at local service centres and more rural locations.

Option EMP4: De-allocate some sites not already developed and allocate elsewhere.

Option EMP5: Concentrate on provision of new employment land in the same locations as residential development, or through mixed use development.

Option EMP6: A mix of the above/other option- please provide details.

Question EMP6: Do you agree that new employment development should be on Previously Developed Land (PDL) unless evidence shows that the development is both valuable to the local economy and not feasible to be developed on PDL?

Question EMP7: Should we consider allocating strategic sites for employment/economic purposes? If so, what uses should we include for them?

Rural Issues

6.11. Babergh suffers from the same issues as many other predominantly rural areas: lower incomes, loss of jobs (to local towns and through improving agricultural technology), poor access to jobs and training, and limited public transport opportunities. As Babergh covers a large area geographically, the transport problems are exacerbated, with a reliance on the private car. Whilst we experience these difficulties, there are also many opportunities and strengths. Babergh has some good road and rail links, particularly to the south of the district, and the nearby ports at Felixstowe, Harwich and Mistley that provide economic opportunities as well as transport links.

6.12. Although the Council only has limited powers over the final use of land, we are keen to promote the renewable energy and sustainable economy sector and will take a positive view on farm diversification and reuse of redundant buildings in rural areas where proposals contribute positively to the local economy and are directly related to the development or generation of energy through low/zero carbon technologies.

Question EMP8: Do you support the Council's stance on rural economic growth in relation to the renewable energy industry?

Tourism

6.13. Babergh has a rich heritage and as a result, is an attractive tourist destination. The Council will support any proposals to encourage tourism as long as they are in compliance with other policies and promote sustainable tourism.

Question EMP 9: Do you think we should be actively promoting the District as a tourism location? What sort of tourism would you want to see promoted?

7 Built and Natural Environment.

- 7.1. This section covers the built and natural environment, a broad ranging area and as such crosses over many other subject matters which are dealt with in other sections. It deals with the natural environment and its constraints, including nature conservation, biodiversity, geodiversity and landscape character. It also covers constraints and issues related to flood risk and pollution. Finally it deals with the built environment and historic conservation.

Local Context

- 7.2. The local context for the built and natural environment is illustrated in the table below reflecting those objectives relevant in the Sustainable Community Strategies as far as they affect Babergh's environment

Transforming Suffolk Suffolk Strategic Partnership Community Strategy	Western Suffolk LSP Community Strategy	Babergh East LSP Community Plan	Babergh District Council Strategic Plan
Greenest County -Retain/enhance value of natural environment	Protect natural environment and local biodiversity and ensure sustainable development		Cleaner greener Babergh
Safe healthy and inclusive communities	-Create and support healthier communities -reduce avoidable early deaths by providing education and support on health and well being; -maximise the potential of all children and young people	Improve health and well being of young people	Safer healthier Babergh
Inclusive communities (access and opportunities for all)	Develop and maintain a safe, strong and sustainable community		Vibrant places and strong communities

The Natural Environment and Countryside

- 7.3. The Babergh district is a predominantly rural area and as such has a rich and varied environment which is attractive and worthy of protection. This includes the Stour Valley, parts of Constable Country and important river valleys. The main centres of population are Sudbury (with Great Cornard), the Ipswich Fringe and Hadleigh with the remaining areas in the district comprising countryside



Landscape Character

interspersed with village settlements. The countryside and natural environment is of value throughout the district, some areas are however designated because they are of particular nature conservation or landscape value. These areas are shown on the Environmental Constraints Map.

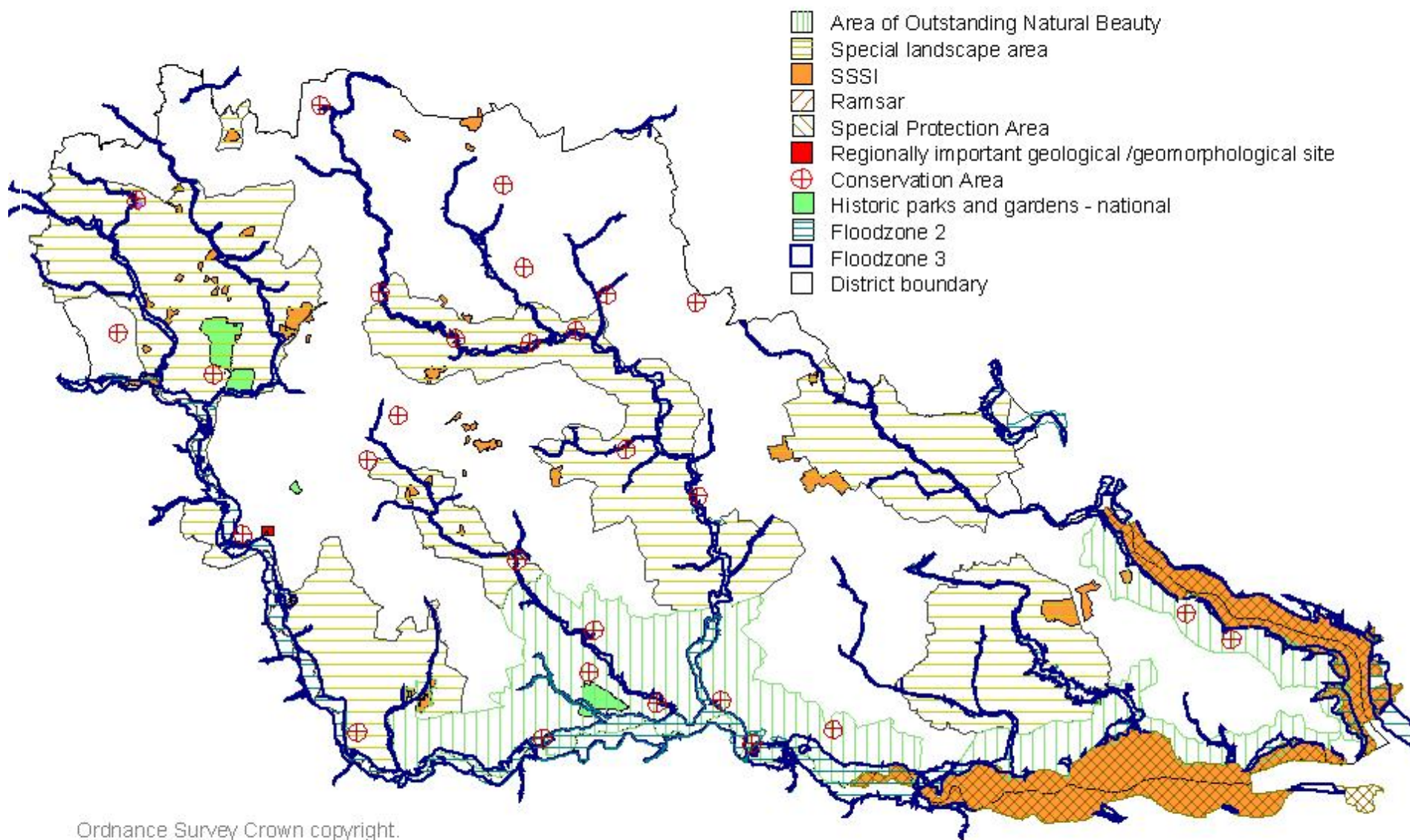
- 7.4. The Babergh District has a varied landscape consisting largely of undulating arable farmland interspersed with river valleys, and is framed on the eastern / south-eastern sides by the Orwell and Stour estuaries. It is mainly unaffected by large scale development due to the small size of settlements throughout the district, with the main exceptions being the Ipswich urban fringe and at Sudbury with Great Cornard.
- 7.5. In recognition of its nationally high landscape value, parts of the district are within the Dedham Vale and the Suffolk Coast and Heaths Areas of Outstanding Natural Beauty, (these areas are shown on the constraints map). Significant parts of its remaining countryside are designated in the current Local Plan as Special Landscape Areas, with the majority including river valleys, and which are of local landscape importance. The future of Special Landscape Areas and Landscape Character Assessment is most appropriately addressed in the Development Control Policies Development Plan Document, and in the meantime SLA designations continue to be covered by Local Plan policy identified to be “saved”.

Question NBE1: We consider that Special Landscape Areas / Landscape Character Assessment are best addressed by the development control policies. Do you agree?

Biodiversity

- 7.6. Having regard to the varied landscape of the district, there is also a wide range of natural habitats throughout the district. A large proportion of Babergh District is an ancient landscape of arable fields and improved grassland which is interspersed with significant clusters of ancient woodland, many of which are designated as Site of Special Scientific Interest (SSSI) (as shown on the environmental constraints map).
- 7.7. The Stour and Orwell Estuaries are of international importance, mainly for their populations of waders and wildfowl which are dependent on the intertidal mudflats and saltmarsh. These afford statutory protection through SSSI designation and as a European Special Protection Area and Ramsar site, as shown on the environmental constraints map.

Environmental Constraints in the Babergh District



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Geodiversity

- 7.8. Babergh has an important geological heritage, particularly in features from the Cretaceous, Palaeocene and Pleistocene periods. Babergh is particularly important for research into the changing warm and cold environments of the Pleistocene period, particularly during interglacial stages. Stutton and Bobbitshole (Wherstead) are nationally important sites which have SSSI designations for this reason. The conservation of the District's geodiversity is managed as part of the Suffolk Geodiversity Action Plan process. The protection of biodiversity and geodiversity features follows a hierarchical approach, set out in national and regional policy. It is the locally important sites or features which need to be considered in terms of the level of protection and management required. These matters are for consideration in development control policies.

Flood Risk

- 7.9. Flooding is a major issue in considering the location of new development. As part of the council's evidence base a Strategic Flood Risk Assessment is being prepared which will be available in Spring 2009. In accordance with PPS25, this will enable the council to take flood risk into account at all stages of the planning process. The Flood Risk Zones 1, 2 and 3 are shown on the environmental constraints map. The overall aim of PPS25 is to direct development to sites of lower flood risk wherever possible, which should be reflected in the site allocations and policies for the Local Development Framework
- 7.10. The evidence base provides the council with the framework for carrying out the 'sequential test' and 'exception test' established in Annex D to PPS25, in all its planning, including in allocating sites for future development and assessing individual planning applications. With the knowledge of the extent and location of flood risk areas and the potential changes as a result of climate change, development in higher risk areas in Babergh can be minimised.
- 7.11. National and regional guidance provide a strong aim that there is a need to ensure that development is resisted in areas of flood risk unless the type of development is appropriate to the type of flood risk in each flood zone (Table D1 and D2 PPS25). It is necessary to embrace the concept of balance management, facilitating development which serves the social and economic needs of the community whilst controlling flood risk and ensuring it is properly managed and mitigated.

Question NBE2: Do you agree that development which can not be located in a lower flood risk area based on the sequential test should contribute towards mitigation of flood risk effects?

Question NBE3: To what extent do you consider development should take into account the implications of climate change and the likely impact on flood risk and what timescale should this be based on ?

Option 1

Consider flood risk based on 10 year climate change predictions

Option 2

Consider flood risk based on 25 year climate change predictions

Option 3

Consider flood risk based on 50+ year climate change predictions

Pollution

7.12. Pollution issues which often arise in planning are those related to noise, odour, light and air quality. The issues related to noise, odour and light can be adequately dealt with under development control policies and other legislation.

7.13. Air Quality: Good air quality is essential for our health, quality of life and the environment. The National Air Quality Strategy (2007 Defra) provides a clear, long term vision for improving air quality in the UK and offers options for further consideration to reduce the risk to health and the environment from pollution. Authorities are required to assess air quality in their area against Government air quality objectives. The Local Development Framework can help in delivering good air quality by ensuring new development is located away from any sources of pollution and by encouraging development in locations where the use of the private car is minimised. Air quality is monitored by the Council and for the most part is good. A few localised areas of concern are on the A12 between Capel St Mary and Stratford St Mary and in Sudbury at Cross Street / Ballingdon Street. An overriding aim is promoted by national guidance, to ensure that we work together to reduce air pollution and to make sure we locate development in appropriate locations to minimise air pollution.

Question NBE4: Should we identify the long term air quality in the locations where issues are identified through monitoring and seek to reduce the pollutants contributing to lower air quality in these areas?

Option 1

Locate development away from sources of air pollution and encouraging development in locations which minimise the use of the car

Option 2

If air pollution is identified as an issue in any development proposals, it should only be allowed if mitigation measures are put in place

Option 3

Develop a specific policy to increase the air quality management to try to improve air quality in the district

Built and Historic Environment

- 7.14. The environmental constraints map shows the predominantly rural nature of the district with a large number of small villages dispersed around the rural area. All of the settlements have a defined character influenced by building form, materials and design. Many are of particular importance due to the historic character of village and town centres. The district includes a very rich heritage including the settlements of Lavenham, Long Melford and Kersey. District-wide there are over 4000 listed buildings, 28 Conservation areas and 5 historic parks and gardens (shown on the environmental constraints Map). It is essential that development has particular regard to the historic character of many of the settlements in the district. It is necessary to accommodate additional growth in the district and at the same time ensuring that the historic environment is safeguarded and where possible enhanced. Many of the larger key and sustainable settlements also are of historic value with a rich heritage of listed buildings and important features within the historic environment. Where it is appropriate to accommodate growth this must have proper regard to the character of the existing settlement. Wider design issues including sustainable design are covered in the Sustainability and Climate Change section.
- 7.15. The spaces between buildings in our towns and village centres are as important as the buildings themselves. The quality of the spaces significantly affects the setting of buildings and the function of those spaces around them. Often enhancement can achieve many objectives, for the wider benefit of the town or village centre. National guidance through the Centre for Architecture and the Built Environment (CABE) for example, provides a wealth of ideas in terms of design concepts. However, delivering improvements to key spaces is often difficult to achieve comprehensively.

8. Sustainability and Climate Change

- 8.1. There is now a large, and increasing, body of evidence to suggest that climate change is a very real risk and that we must take steps to adapt to and to reduce our impact on climate change. All stages of development, from design through to decommissioning of buildings must now consider the impacts of climate change and how to withstand them as well as preventing the situation from worsening in the future. By following the principles behind sustainable development, and implementing these through planning policies, we will be able to reduce the impact that development has on our environment.

Context

- 8.2. PPS1 requires development plans to address the causes and potential impacts of climate change. The policies should reduce energy use and emissions, promote use of renewable energy and also consider climate change impacts when locating and designing development. The PPS1 Supplement sets out the importance of sustainable development, reducing emissions, supplying energy from renewable sources, and the need to mitigate against and adapt to climate change. Planning authorities are expected to take a positive stance on inclusion of renewables and sustainable construction and buildings in developments. They can also require higher than minimum national standards for development, supported by legislation in The Planning and Energy Act 2008. PPS22 enables LPAs to develop policies (where viable) requiring:
- % of development's energy to be supplied from on-site renewables; and
 - % of a development's energy to be from a decentralised low/zero carbon energy source
- 8.3. The RSS sets requirements for energy efficiency, water use and waste management. There is also a target for energy generation from renewable or Low or Zero Carbon technologies where feasible, and thresholds above which the target must be applied.
- 8.4. The current Local Plan (Alteration No. 2, adopted June 2006) contains objectives relating to:
- Protection of water quality and resources;
 - Flood protection;
 - Efficient use of resources and promotion of alternative energy; and
 - Sustainable waste management
- 8.5. Local community priorities established through Sustainable Community Strategies and the Babergh District Council Strategic Plan, such as a greener, cleaner Babergh, have the following linkages to the sustainability and climate change section of the Core Strategy as shown in the table below.

Transforming Suffolk 2008-2028 (Suffolk LSP)	Western Suffolk LSP	Babergh East LSP	BDC Strategic Plan
A prosperous and vibrant economy - transport and	Enable and develop a prosperous and sustainable economy	Address poor access to	A greener, cleaner Babergh -balance between protecting environment and supporting

infrastructure to support sustainable economic growth	Encourage sustainable tourism Develop and maintain a safe, strong and sustainable community	jobs and training for local people	development, better traffic management, air quality, road infrastructure and effective public transport
The greenest County - reduce Suffolk's carbon footprint and adapt to the changing climate and geography	Protect our natural and built environment and local biodiversity and ensure sustainable development		A greener, cleaner Babergh -smaller carbon footprint, clean environment, less waste sent to landfill

8.6. Much of the energy used currently is provided through the combustion of fossil fuels, for example through power stations or directly from a car engine. The combustion process is responsible for CO₂ and other greenhouse gases being released into the earth's atmosphere. These gases retain the sun's heat, so increasing concentrations of them in the atmosphere leads to rising temperatures felt on the earth's surface. Climate change will result in more frequent occurrences of extreme weather; hot dry summers, and mild wet winters. There is also a risk of droughts, high winds and tornadoes, ground stability issues and increased risk of flooding.



8.7. The climate is already changing, and we need to ensure that development is robust and flexible enough to deal with future conditions as well as having minimal adverse effects on future climate change. As one of the primary causes of climate change is the emission of greenhouse gases, an effective way of reducing the effects of development is to reduce associated emissions. There is a twofold process for this:

- 1) Reducing the demand for energy
- 2) Increase the supply of energy through sources with low associated emissions.

Question SUS1: Do you agree that the most important issues (of equal importance) relating to climate change and sustainability are

- a) ensuring future development is robust enough to withstand the effects of climate change; and
- b) the need to ensure future development has minimal adverse effect on climate change in the future?

8.8. Future development must have low energy demand, and this needs to be considered at all stages of the development process. Methods for doing this include:

- choice of location to reduce need to travel;
- choice of site appropriate to end use and users;
- design of the building;
- integration of energy efficient fittings and renewable energy;
- sustainable construction;

- sustainable use including education of users; and
- consideration of decommissioning of buildings and potential redevelopment of building/sites

Question SUS2: Do you think there is a need for a design guide to provide in depth advice on ways in which sustainability can be integrated into design for Babergh?

- 8.9. Water is a precious resource and expected to become scarcer with high development pressures and longer hotter summers so it is vital that water efficiency is an integral consideration in development. Emissions associated with moving and heating water can be high, so reducing use and waste will minimise these. There are also high emissions related to the movement, collection and disposal of waste. Babergh has a good record of dealing with waste but this must be improved further.
- 8.10. There are other aspects of sustainable development that are not specifically mentioned here. These are discussed in other parts of the Core Strategy or they are issues that planning policy cannot directly influence.

Question SUS3: Are there any other issues you feel need additional details setting out in the Core Strategy?

- 8.11. The overall aim for Babergh is to achieve prudent, sustainable and efficient use, reuse and disposal of resources. Because “sustainability” covers such a broad topic, it is not felt that we should be considering each issue separately for monitoring and assessment purposes- instead we should use pre-determined assessment methods such as the Code for Sustainable Homes (CSH) and the Building Research Establishment’s Environmental Assessment Method (BREEAM) (see topic paper for further details).

Question SUS4: Do you agree that we should use CSH/BREEAM for monitoring and target setting purposes?

- 8.12. Although sustainable development is a key consideration in development decisions, it must also be balanced with the other priorities: i.e. meeting housing demand, job growth targets and infrastructure provision. There may be conflict between some of these, for example delivering houses at CSH level 6 may be more expensive and may hinder the overall delivery.

Question SUS5 Do you have any comments on where you feel the sustainability agenda fits into the overall planning agenda?

Residential Development

- 8.13. National minimum standards for development are set in Building Regulations, and the policy statement “Building a Greener Future” sets out a staged increasing target.

Question SUS6 What level of the CSH do you think would be most appropriate for Babergh?

- 1) National minimum (level 3 by 2010, level 4 by 2013, level 6 by 2016)?
- 2) Level 3 by 2010, Level 4 by 2012, Level 6 by 2015?
- 3) Another option above national standards?

Please explain your answer

Question SUS7 The Code for Sustainable Homes applies to all new build dwellings. Do you think that the adopted level (from Qu SUS 5) should be applied to:

- 1) All new build, conversions, redevelopments and extensions in excess of 1 room?
- 2) All development 1 dwelling and above?
- 3) All development 3 dwellings and above?
- 4) Another level- please give details and reasons

Non-Residential Development

Question SUS8 Currently there are no statutory requirements to develop above the minimum standard for non-residential buildings. Do you think we should require development to achieve:

- 1) National minimum standards (Building regulations)?
- 2) BREEAM Good?
- 3) BREEAM Very Good?
- 4) BREEAM Excellent?
- 5) Another standard- please explain.

Question SUS9 What threshold do you feel is appropriate to apply the level set out in question SUS 5:

- 1) All development (new build, conversion & significant extensions (1 room or more)?
- 2) Development over 0.1ha or 100 sq m?
- 3) Development over 1 ha or 1000 sq m?
- 5) Another threshold- please explain.

Renewable Energy (for all end uses)

Question SUS10 What level of renewable energy provision should developments be required to comply with?

- 1) No requirement
- 2) National or regional requirement* (please state)
- 3) Another level- please explain.

* Table shows the % electricity and overall energy to be generated from renewable sources

		National	Regional	Potential higher
2010	Electricity	10%	10%	10%
	Total Energy	n/a	n/a	n/a
2015	Electricity	n/a	n/a	17%
	Total Energy	n/a	n/a	15%
2020	Electricity	20%	20%	25%
	Total Energy	15%	17%	20%

All levels also require 5.75% of all fuels to be from biofuels

Question SUS11 Of the requirement in Question SUS7, what proportion should come from decentralised sources?

- 1) No requirement
- 2) At least 25% decentralised
- 3) Another threshold- please explain.

Question SUS12 What threshold should be applied to the developments?

- 1) All
- 2) Above 1 dwelling or 100 sq m non-residential floorspace
- 3) Other threshold

9. Retail and Town Centres

9.1. Retailing is an important component of national and local economies and provides jobs and services to communities. Traditionally retailing was focussed around town centres but there have been some economic and social changes that have impacted on this. These changes have led to more focus being placed on the vitality and viability of town centres and subsequently this is one of the key objectives of national planning policy in PPS6.

9.2. On a regional level the East of England Plan states that city and town centres should continue to be the focus for investment, environmental enhancement and regeneration. The East of England Plan defines a regional structure of retail centres, but none of the towns within Babergh are large enough to rank as major regional town centres. Below this level the regional plan identify centres of regional strategic importance that would apply to towns within the Babergh District.

Key research studies for this theme are:

- Babergh District Retail Study July 2008
- Sudbury and Hadleigh Town Centre Health Checks 2008

9.3. Local community priorities established through Sustainable Community Strategies and the Babergh District Council Strategic Plan, such as developing a prosperous, vibrant and sustainable economy, have the following linkages to this section as shown in the table below.

Suffolk LSP	Western Suffolk LSP	Babergh East LSP	BDC Strategic Plan
A prosperous and vibrant economy - Use Suffolk's unique selling points to capture emerging markets - Reduce economic inequalities across the county - Improve transport and the infrastructure to support sustainable economic growth.	Develop a prosperous and sustainable economy -Enable a prosperous, sustainable economy -Encourage sustainable tourism - Alleviate poverty and reduce health inequalities	Access to services, jobs and training Provision and retention of employment sites to encourage economic development (including tourism)	A strong and sustainable Babergh economy - Sustainable growth, with more small and medium sized enterprises situated here -More skilled and higher paid jobs with a higher proportion being taken up by Babergh residents -Improved infrastructure in our market towns to increase vitality and viability

9.4. The adopted Local Plan identifies objectives in relation to retail/ town centres within the District and these may provide some elements that could remain within the Core Strategy. One of the objectives however relate to Development Control issues which will be addressed in a separate Development Plan Document and not the Core Strategy. Another objective is not a spatial objective and can therefore not be included as such in the Core Strategy. The remaining objectives include:

1. To protect or enhance the vitality and viability of the market towns of Sudbury and Hadleigh and to promote new retail investment in their defined town centres, in order to maintain and enhance their role as the main shopping centres in the Babergh District.
2. To support the retention of existing shopping facilities in rural areas and local centres and to encourage the provision of new facilities where this is consistent with Local Plan Policies.

Question R1: Do you agree that the Core Strategy needs to address how to best protect and enhance the viability and vitality of town centres in the district, as well as to address retaining existing shopping facilities in rural areas and local centres?

Background

- 9.5. Babergh District's retail facilities and services are mainly focussed at Sudbury and Hadleigh, the district's two principal towns. The retail facilities and services in these towns are supported by a network of smaller local and village centres, notably those of Long Melford, Lavenham and Great Cornard. The district as a whole faces significant retail competition from the nearby towns of Ipswich, Colchester and Bury St Edmunds, which all influence shopping patterns on a subregional level and contribute to a significant amount of retail expenditure leakage from the Babergh District.

- 9.6. Sudbury is the largest town within the district and generally performing well in retail and economic terms. There is strong potential for Sudbury to expand its retail economy and a requirement is to provide larger and better configured units in the town centre and enable Sudbury to maintain its national rank without materially changing its overall role and status in the regional shopping hierarchy. Additional floorspace requirements for Sudbury up to 2021 is 17 300 m², identified in the Retail Study of 2008. The Local Plan identified a number of opportunities for



redevelopment (expansion) and improvement to enhance Sudbury's role as a retail destination although this will not make provision for all of the additional 17, 300 m² of floorspace identified up to 2021. Additional retail space will therefore have to be allocated in Sudbury.

- 9.7. Hadleigh is an attractive market town which serves both the convenience, and to a lesser degree the comparison goods, shopping needs of its catchment. The town is performing reasonably well, although average sales densities in the comparison goods sector appear low. The retail offer is unlikely to get materially larger in terms of floorspace, since the town is too small and located too close to Ipswich and Copdock Mill to attract the multiples. Priorities would be the enhancement of retail quality and consumer choice and encouraging small scale refurbishments and developments, while having regard to the many listed buildings and the conservation area. An allocation making provision for a new supermarket in Hadleigh covering the additional floorspace requirements identified up to 2021 in

the Retail Study of 2008 is included in the adopted Local Plan. It is not envisaged that any new allocations will be made.

Question R2: Which of the following options do you think would promote the vitality and viability of town centres and local centres best?

Option 1: Business as usual – Define a retail hierarchy for the district and make provision for additional retail space to be provided at Sudbury up to 2021

Option 2: Setting out particular aspects to promote and enhance the vitality and viability of town centres and local centres

Option 3: Complete a Retail Strategy for Sudbury and Hadleigh to set out the framework for management of change and growth in these centres

Option 4: A combination of these options or alternative option?

Please give details and reasons.

Question R3: If you agree that the Core Strategy should set out particular aspects to promote the vitality and viability of town centres and local centres in the district (Option 2) which aspects should be included?

10 Social and Community Infrastructure

Background

- 10.1. As a predominantly rural district, community and social infrastructure provision is dispersed around the district and tends to be related to the settlement pattern. The geographical make up of the district means that access to facilities will always be an important issue, particularly in remote rural areas where settlements are widely dispersed. Alongside investment in new housing and jobs, investment in community infrastructure is central to improving the lives of existing and future residents in the district and in creating and maintaining sustainable communities. Adequate community infrastructure, both now in accordance with additional requirements generated by growth is an important part of the LDF.
- 10.2. A new all encompassing aim is suggested, which is “to ensure that there is an appropriate range and distribution of community facilities and services provided in accessible locations to meet the needs and aspirations of all people in the Babergh district”
- 10.3. For the purposes of this section, community and social infrastructure includes, education, health, social care, community facilities (libraries, post offices, village halls), sport recreation and open space / green infrastructure.

Context Social and Community Infrastructure

- 10.4. An over-riding aim is set out in Planning Policy Statement 1, which states; “Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development, by ensuring that development supports existing communities and contributes to the safe, sustainable, liveable and mixed communities, with good access to jobs and key services for all members of the community.”

Local Context

- 10.5. Many of the services associated with community and social infrastructure are provided or supported by other authorities or agencies. The Strategic and policy context is therefore of significant importance. The key Strategic Policies are illustrated comparatively in the table below;

Transforming Suffolk Suffolk CC Strategic Plan	Western Local Strategic Partnership	Babergh East Local Strategic partnership	Babergh District Council strategic Plan 2008-2018
Safe, healthy and inclusive communities	Develop and maintain safe strong and sustainable community	Support projects which raise opportunities for local communities	Vibrant places, strong communities
	Create and support healthier community		Safer healthier Babergh

Greenest County		Cleaner greener Babergh
Learning and skills for the future	Maximise potential of all children and young people	Engage with young people and promote sense of active partnership

Crime and Disorder

- 10.6. It is acknowledged at a local and national level, that problems arising from crime and disorder are linked to a wide range of issues. It is understood that good provision and access to a range of community and social facilities can have a significant impact on reducing crime and disorder. Planning for new development can contribute to crime prevention, through good design. There is an abundance of national guidance in respect of design as well as the Office for Deputy Prime Minister (ODPM) / Home Office Safer Places- the Planning System and Crime Prevention.
- 10.7. Babergh's Community Safety Partnership (CSP), through its annual strategic assessment, have identified alcohol fuelled criminal damage and public order offences (including violence) as a key priority for its plans to tackle crime and disorder in the District. Currently criminal damage accounts for 27% of all recorded crime in Babergh and violence against the person (includes public order offences) accounts for 18%. These are the top two crimes committed in Babergh and further analysis on the location and times that the offences occur, coupled with information on those perpetrating the crimes, show a very strong correlations with alcohol use and the 'night time economy' (pubs and clubs).
- 10.8. The purpose of the CSPs annual strategic assessment is to provide a balanced evaluation of the most significant issues affecting the residents of Babergh and to propose specific actions to try and tackle them. One of the actions that the partnership are agreed upon is to work with planners and development staff to pro-actively influence the establishment of a more balanced social (night-time) economy in town centres, particularly Sudbury but also to a lesser extent Hadleigh. The aspiration behind this is that providing more socialising options for people could lead to less alcohol use and/or less intensive alcohol use, which will have a positive impact on people's behaviour. This, it is hoped, would reduce crime and increase the range of people (i.e. a community benefit) who feel able and comfortable to use the town centres at night. Town centre issues are covered in the Retail section.

Question SCI1: Do you consider that crime and disorder issues in the town centre can be addressed through a Town Centre Strategy, if Option 3 Question R2 in the retail section is preferred, or should this be addressed in subsequent, more detailed DPDs? Please specify?

Please give reasons for your answer

Education

- 10.9. As a rural district, education provision is closely linked to the surrounding areas and districts. There is a total of 50 schools in the district, comprising a mix of Primary, Middle, Upper and High as well as a few Schools for Special Education Needs. Suffolk County Council is responsible for the provision of education. The whole issue of education in Suffolk is currently under review and the Government is moving towards achieving a two tier system throughout. The School Organisational Review is already underway in some parts of the district with other areas due to follow later in 2009/10.
- 10.10. Issues and options relating to education provision are therefore, driven by processes outside of the Local Development Framework. Whilst the Core Strategy will need to reflect future changes, at the present time issues are very broad.
- 10.11. The development of additional housing will require the funding of school places or provision depending on the size and location of the development via a Section 106 Agreement with the developer. The Council will ensure that education provision develops in accordance with new housing development and reflects the projected educational need in specific areas and district wide.

Care for young people

- 10.12. Most of the issues concerning young people are addressed through either education provision or through community facilities. It is necessary to ensure that young people are adequately catered for in the district, through provision for education and leisure as well as childcare, as more parents seek employment. Again much of this is catered for through the education system, with more extended school activities being provided often linked to schools, including holiday activities. In addition pre-school needs are important, and are usually provided through a mixture of private nurseries/ crèches and private child minders or nannies. Children's Centres are a relatively new concept and are already provided by Suffolk County Council in Hadleigh, Great Cornard and Sudbury. A further Children's Centre is planned for at Glemsford, with the aim of establishing Centres at East Bergholt, Capel St Mary, Holbrook and Brantham. Ensure that the very young in the district are catered for in terms of pre school needs and hours beyond the school day for school age children.

Health

- 10.13. Babergh district lies within the area covered by Suffolk Primary Care Trust. As a large rural district, healthcare issues are inevitably linked in with those of surrounding areas and districts. Major hospital facilities are provided outside the district at larger urban locations at Bury St Edmunds and Ipswich. Primary health care is provided at a local level through a network of GPs, health Clinics and Doctor Surgeries. Maintaining provision in Sudbury is a key issue for the LDF as conventional hospital provision at Walnut Tree and St Leonards are to be replaced by a health centre.

- 10.14. The exact location of new primary health care in Sudbury is not yet finalised. Planning and feasibility for this are already underway and part of a separate process.
- 10.15. Elsewhere in the district healthcare provision is available to varying capacities. The timescale for reviewing health care needs seems to vary from practice to practice, but in all cases it is shorter than the Core Strategy timescale. It is necessary to ensure that needs meet demand throughout the district and that the LDF must be flexible enough to accommodate changes arising from reviews of healthcare provision at various stages during the life of the Core Strategy. The Council will ensure that healthcare provision in Sudbury must ensure that it is not only adequate for the existing population but also caters for any future growth. Elsewhere in the district it is necessary to ensure that health care provision is adequate for additional population as a result of residential growth. In rural areas good access to adequate health care facilities is vital to safeguarding community health and wellbeing. Mechanisms to prevent inequalities need to be explored to ensure delivery of good access for all.

Social care

- 10.16. Care for older people: Suffolk County Council is now an enabling Authority, rather than a direct provider of services. The service is under review, but the overall aim is to care for people in their own homes for as long as possible, and when more intensive care is needed, that this be provided elsewhere. It is important therefore, to ensure that homes are as adaptable as possible. The Government's "Lifetime Homes" and Code for Sustainable Homes will assist with this process. Issues concerning housing for older people are in the Housing Section.
- 10.17. Whilst it is expected that for the most part people will remain in their own homes when they are older, it is also expected that there will be a period when more intensive care is needed. This is likely to be very sheltered accommodation, rather than the more traditional care homes. It is important to ensure that adequate support services are provided close to where older people are living.

Community Facilities

- 10.18. Provision of adequate community facilities, particularly in rural areas contributes to maintaining sustainable communities. Access to key facilities, including libraries, village halls/community centres, and post offices contributes towards the national objectives of "meeting diverse needs of all people in existing and future communities, promoting personal well being, social cohesion and inclusion and creating equal opportunities for all utilisers" (PPS1).
- 10.19. The parish profile evidence base lists all the of the community facilities in all settlements throughout the district. Most of the villages have access to



community / village halls, although some are in need of improvement and may not serve all the local community needs. The decline of Post Office facilities in rural areas has been a national trend which has affected some areas of Babergh. However, the larger settlements have retained a post office service, it is the more remote areas which may now need to travel further for the closest post office. The library service is the responsibility of Suffolk County Council. Opportunities for improvements to the provision may be required, looking at potential for the library buildings to provide a greater focus for additional community services. Much of the rural area of the district is served by the mobile libraries, a service which the County Council hopes to increase. Again there is an opportunity for mobile library vehicles to improve access to services in rural areas which is a recurring theme in community strategies throughout. Babergh will be guided by an aim of establishing and maintaining sufficient service provision of community facilities and particularly to ensure reasonable access to all, including within the more remote rural areas.

Sport and Recreation Facilities including Green Infrastructure

- 10.20. Provision for sport and recreation is important in meeting many cross cutting objectives. These include;
- Promotion of health and wellbeing by making provision for physical activity; (PPS1, PPG17)
 - Social cohesion and a contribution to healthy and safe places to live (including crime reduction); (PPS1)
 - Provision of public space which could benefit a range of interests from recreation, biodiversity, design and public realm (PPS1) PPG17);
- 10.21. The wider context also relates to a network of green infrastructure corridors and it is acknowledged that all open spaces can contribute to landscape and biodiversity. Issues are also covered in the Built and Natural Environment Section. A Strategy for Open Space Sport and Recreation is currently being prepared by Babergh District Council which will form part of the evidence base. The audit information which is already researched indicates where provision currently exists and also makes an assessment of its quality as required by PPG 17. The Strategy will identify local standards of provision and highlight areas in need of additional provision, the type of provision required and the need for qualitative improvements.
- 10.22. Other sport and recreation facilities provided in the district range from swimming pools, indoor sports halls, multi-use games areas, tennis courts. These often are intended to serve a wider catchment area as people are willing to travel a greater distance for the use of such facilities (The Strategy being prepared on Sport and recreation will also include facilities for indoor sports and recreation).
- 10.23. Where shortfall of provision has been identified it is possible to seek contributions from development to help fund the additional facilities which will be needed to serve the development. The current planning policy approach for this is to request contributions from most residential development to allow for the cumulative effect of lots of small developments. This is consistent with guidance in PPG17.

- 10.24. The Babergh district also offers a range of opportunities for informal recreation including many water recreation opportunities, the most extensive being Alton Water and the Stour and Orwell Estuaries. The estuaries are also important for their nature conservation interest, so recreational use has to be carefully balanced. Alton Water already serves a regional catchment and is identified in the Haven Gateway Green Infrastructure as having potential to be extended to contribute towards the Accessible Natural Green Space standards (ANGST). It is necessary to ensure that everyone has easy access to a range of sport, recreation and open space provision to contribute to their well being, health and safety.

Question SCI2: Do you consider that green infrastructure should be addressed through the Core Strategy? And what priority should it have?

Option 1

If yes please specify options

Option 2

No green infrastructure should be dealt with by more specific DPDs

Please give reasons for your answer

Delivery of Community and Social Infrastructure

- 10.25. It is essential that infrastructure provision is improved to support the demands made by new development. The opportunities for delivering improvements to social and community infrastructure to support the growth of the district needs to be considered and addressed through the Core Strategy. Currently, contributions are sought for open space and provision for affordable housing, and highways (or other appropriate) improvements are usually secured through the use of Section 106 Agreements on individual planning applications, as appropriate. There is a need to identify priorities and to consider the weight to be given to the different community facilities (health facilities, school provision, village / community halls, post office, shop (general stores), libraries, children's play areas, other public open space.

Question SCI3: Do you consider that all facilities are of equal importance?

Option 1

Yes

Option 2

Do you consider that one or more facilities are of greater importance, please specify

- 10.26. The need to consider the most appropriate mechanisms for securing sufficient provision for social and community infrastructure from new development.

Question SCI4: Do you consider that there should be a threshold for the type and size of development that should contribute to the improvement of social and community infrastructure?

Option 1

Yes

Option 2

Do you consider that contributions should continue to be sought and secured through Section 106 Agreements, case by case?

Question SCI5: Specific Provision

Do you consider that the Core Strategy should make any specific provision for social and community infrastructure?

Option 1

Yes, Please specify what and / or where?

Option 2

No, this should be left to development control policies

11 Physical Infrastructure

- 11.1. Increased investment in infrastructure is required to mitigate the impact of further housing and employment development and enable growing communities to be as sustainable as possible. Development can place additional demands upon physical infrastructure, as well as having impacts upon the environment.
- 11.2. In line with the guidance contained within Planning Policy Statement 12: Local Spatial Planning the District Council will work with others to identify what will be required to deliver the RSS and Core Strategy policies and proposals. At a local level for the purposes of this section it could centre upon water provision, wastewater treatment and collection, drainage, electricity provision, gas provision, waste disposal, road improvements, public transport, police and fire services. At the sub-regional level it could include further investment in road and rail connections. The District Council has been working with service providers and utility companies in the district and information has been collected regarding physical infrastructure capacities and future requirements. However it is too early in the process of preparing the Core Strategy to suggest specific infrastructure improvements. This will be addressed in more detail as the Core Strategy preparation progresses.
- 11.3. While some of this physical infrastructure will continue to be secured via planning agreements, in conjunction with the Haven Gateway Partnership, and the Local Strategic Partnerships, the private sector and utility providers/ statutory undertakers, the District Council will investigate the extent to which some of the infrastructure may be delivered via a 'Community Infrastructure Levy', this works on a tariff basis with contributions levied per new dwelling, to pay towards particular kinds of infrastructure provision.
- 11.4. Local Community priorities as identified in Sustainable Community Strategies and other local consultation, such as improved access to transport, infrastructure and services are linked to physical infrastructure provision as shown in the table below.

Suffolk LSP	Western Suffolk LSP	Babergh East LSP	BDC Strategic Plan
A prosperous and vibrant economy - Use Suffolk's unique selling points to capture emerging markets - Reduce economic inequalities across the county - Improve transport and the infrastructure to support sustainable economic growth.	Develop a prosperous and sustainable economy -Enable a prosperous, sustainable economy -Encourage sustainable tourism - Alleviate poverty and reduce health inequalities	Access to services, jobs and training	A strong and sustainable Babergh economy - Improved infrastructure in our market towns to increase vitality and viability Vibrant places and strong communities - A reduction in the impact of rural isolation on parts of the district particularly limited access to affordable housing, transport and jobs. - effective and convenient access to the public services by physical,

			telecommunications or other electronic means. - public services appropriately reflect the needs, aspirations and choices
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Question INF1: Do you agree that the Core Strategy needs to address how new developments should support infrastructure improvements, what strategic infrastructure requirements should be supported, when would strategic infrastructure requirements be needed and who will be responsible for implementation? If not please provide an explanation of the key issues that you think should be identified and why?

Background

Water, wastewater treatment and collection

- 11.5. Anglian Water is the statutory provider of water and responsible for the operation and maintenance of the wastewater collection and treatment infrastructure within the Babergh District and has a statutory obligation to meet the growth planned for the district.
- 11.6. Water constraints are not anticipated within the district of a scale and nature such that they would impact on growth levels within the district. Emphasis must be placed on supporting water-efficient design for new homes (and other developments) through the standards in the Government's Code for Sustainable Homes and other measures.
- 11.7. There may be short-term constraints in upgrading Sewerage Treatment Works for increased capacity within the district, but details regarding this are not readily available until the exact location and nature of proposed development has been defined. The Water Cycle Study Stage 2 will ultimately provide more detailed information regarding the implications for new growth.

Electricity and Gas

- 11.8. EDF Energy (EDFE) is the electricity supplier for the Babergh district. The district is well covered in terms of electricity infrastructure. If development is focussed at Sudbury, Hadleigh and the Ipswich fringe it is likely that existing electricity infrastructure at these locations will need to be upgraded. However it has to be noted that only a limited amount of development could also potentially be accommodated at villages without upgrading electricity infrastructure, although any upgrades might be more local in nature. The anticipated upgrades are likely to have impacts in terms of timescales and this will need to be considered when determining the scale and distribution of future growth across the district. Discussions are presently taking place with National Grid regarding gas infrastructure.

Waste

- 11.9. As the Waste Disposal Authority, Suffolk County Council is responsible for waste management in the County and prepares a Waste Local Development Framework for the County. There are no treatment facilities for municipal waste in the Babergh District. Currently there is a depot in Sudbury for parking and maintenance of the refuse collection vehicle fleet. It is anticipated that this will re-locate to a new joint depot with Mid Suffolk District Council in 2009. Additional requirements in terms of waste would be local transfer and recycling facilities that would be required as developments are completed.

Road and Rail

- 11.10. Responsibility for transport is shared between Central Government, Suffolk County Council (and the District Council). Central government exercises its responsibility through the Department of Transport and the Highways Agency. The Primary Route Network in the district comprise the A14 and A12 trunk roads, supported by the A134 (Sudbury to Bury St Edmunds), the A131 (Sudbury to Braintree roads), the A1070 (Ipswich to Sudbury) and the A137 (Ipswich to Manningtree).
- 11.11. The A12 and A14 are trunk roads and the responsibility of the National Highways Agency. Other adopted roads in the District are managed and maintained by Suffolk County Council. A few local roads are owned and maintained by Babergh District Council.
- 11.12. The junction of the A12 and A14 at Copdock is already at capacity, with traffic issues in this location having, in many cases, a significant knock-on effect on the surrounding villages and on Ipswich. The A12 and A14 are showing congestion and this will increase between 2021 and beyond. Any planned housing/employment needs to be considered carefully and supported by an assessment of transport impacts. The assessment must provide evidence that the planned development will work either without affecting the Highways Agency Network or that it will work if mitigation is provided and funded by the developer.
- 11.13. Sudbury and its immediate surrounding area will be sensitive to additional development, with air quality issues and increased congestion. Also of particular concern are any villages affected by A14/ A12 for example Sproughton and Copdock/ Washbrook.

The following improvements are already required in Sudbury:

- Belle Vue junction improvements
- Sudbury bus station facilities and better rural bus interchange
- A134 / A131 roundabout (road safety scheme)
- Improve access around the town for cyclists and pedestrians
- Cross Street area traffic management
- Measures to improve air quality in particular areas of the town
- Sudbury Western Bypass

- 11.14. Major projects such as any Sudbury Western Bypass are reliant on central government for funding and implementation. Babergh District Council has however safeguarded the route of the Bypass should a scheme come forward in the life of the Local Plan (to 2016) and it has to be considered if this should be included in the Local Development Framework.
- 11.15. There are HGV problems for residents in settlements such as Lavenham, resulting from local agriculture/ deliveries and satellite navigation box misrouting. In Lavenham restrictions and redirection on the A1141 were implemented early in 2008. Several improvements are also required for pedestrians and cyclists in the District such as at Brantham, Copdock, Hadleigh, Ipswich fringe and Sproughton. Discussions are presently taking place with Network Rail regarding rail infrastructure.

Fire

- 11.16. It is unlikely that housing development spread throughout the district would result in any upgrading of fire cover or providing additional fire stations. It could be different of course if the numbers and types of buildings in a particular location are vast and constitute a 'New Town' or 'settlement'. There is no 'critical' threshold, it would all be risk assessed upon application.

Police

- 11.17. If there was significant population/housing/industrial growth under the current policing model there would be a need for additional Safer Neighbourhood Team bases in these growth areas. These could involve the housing of partner agencies in the same premises.

Question INF2: Do you think it is important the Core Strategy should address infrastructure provision and if so which of the following approaches should be followed:

Option 1: Business as usual – secure infrastructure through Section 106 Agreements on a case by case basis

Option 2: Seek contributions based on a standardised local 'tariff' approach

Option 3: Make provision for particular large scale infrastructure requirements

Option 4: Secure grant funding from national government for bigger infrastructure projects

Option 5: A combination of these options or an alternative option

Please give details and reasons.

Question INF3: What number of houses (or size of commercial developments) do you think should apply in terms of Option 2?

Question INF4: What physical infrastructure do you think would need to be provided in terms of Option 3?

12. Monitoring and Implementation

- 12.1. The Council is responsible for development by determining applications and enforcing planning policies in the district. Because of this, it is vital that we have the appropriate policies in place, develop the most effective targets to aim for and the best indicators to monitor them with.
- 12.2. To ensure that the LDF policies are effective, it is important to set clear targets that are developed in conjunction with the policies to allow us to monitor their success. The SMART principle can be used here to ensure appropriate targets are set: Simple, Measurable, Achievable, Realistic, and Time constrained.
- 12.3. Indicators will need to be developed to measure the progress made towards achieving targets. There are several different types of indicators that will be used, all measuring slightly different things.
- 12.4. Contextual indicators provide background information against which the effects of policies can be assessed, and are selected to highlight the key issues in the area being monitored. They are used to establish the starting point for the monitoring in terms of the wider social, environmental and economic issues and are drawn from a variety of sources.
- 12.5. Core Output Indicators (COIs) are centrally set indicators against which all Local Planning Authorities must measure their performance. The Government updated the set out of COIs in July 2008 to provide both LDF Annual Monitoring Reports (AMR) and Regional AMRs with the same COIs to ensure consistency between the two sets of reports.
- 12.6. Local output indicators are used where the COI does not cover what is of interest specifically to the local area. Significant Effects Indicators monitor the significant effects of a plan or a programme. They tend to focus on environmental issues such as biodiversity, SSSI (Sites of Special Scientific Interest) and renewable energy. An annual report will be published containing information about the extent to which the objectives as set out in the development plan are being achieved.
- 12.7. Significant Effects Indicators monitor the significant effects of a plan or a programme. They tend to focus on environmental issues such as biodiversity, SSSI (Sites of Special Scientific Interest) and renewable energy.
- 12.8. An Annual Monitoring Report will be published containing information about the extent to which the objectives as set out in the development plan are being achieved.
- 12.9. An effective monitoring framework is vital to ensure that the policies are working correctly and that they are having the desired effects. It enables a clear picture to be formed of what is happening in the district and shows whether targets are set at the right level.



- 12.10. Detailed monitoring and implementation frameworks will be drawn up, along with information on responsibility for implementation, at a later stage in the Core Strategy preparation process when the policies have been identified and targets set.
- 12.11. It must be remembered that monitoring is an iterative process and reacts to changes in the district as the policies are being implemented. The indicators, targets and even policies could, and even should, change as a result of the monitoring in the process of ensuring that we have the best policies and targets in place and that they are being implemented correctly.

Glossary

Adopted

A document that has been adopted means it has gone to committee in its final form and has been approved by the council.

Affordable Housing

Affordable housing includes social rented and intermediate housing provided to specified eligible households whose needs are not met by the market. Affordable housing should:

- Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices.
- Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.

AMR- Annual Monitoring Report

A report that assesses the performance of planning policies and shows progress on the production of the Local Development Framework (LDF).

AONB- Area of Outstanding Natural Beauty

A landscape designation showing that an area is of national importance, designated by the government.

BREEAM - Building Research Establishment Environmental Assessment Method

A method for assessing the environmental sustainability of a building against set criteria to provide a graded rating. The assessment relates to the overall management of the building, energy use, health and well being, pollution, transport, land use, ecology, materials and water.

Brownfield

Land that has been developed on before (excluding agricultural buildings and including garden land).

CIL – Community Infrastructure Levy

A scheme in which local planning authorities are required to set out charging rates on most types of new development in the area. The proceeds of the levy will be spent on local and sub-regional infrastructure to support the development of the area.

Comparison Goods

All other retail goods after convenience goods, normally large items that are infrequently brought.

Convenience Goods

Low cost, everyday items that consumers are unlikely to travel far to purchase.

CSH - Code for Sustainable Homes

An environmental impact rating system for housing in England, setting new standards for energy efficiency and sustainability.

DPD- Development Plan Document

Outline the key objectives of the Local Development Framework (LDF).

EERA- East of England Regional Assembly

The body leading the preparation of the Regional Spatial Strategy.

Greenfield

Land that has not been developed on before, usually farmland.

LDD – Local Development Document

The generic name for both development plan documents and supplementary planning documents.

LDF- Local Development Framework

A portfolio of documents, which collectively deliver the spatial planning strategy for an area.

LDS – Local Development Scheme

A statement setting out which documents will make up the local development framework and when they will be produced.

LSP – Local Strategic Partnerships

LSP's are non-statutory bodies intended to bring together the public, private, voluntary and community sectors at a local level. Their purpose is to improve the delivery of services and quality of life locally.

PPG – Planning Policy Guidance

Documents that provide guidance to local authorities and others on national planning policy and the operation of the planning system. Now being replaced by PPSs.

PPS - Planning Policy Statements

Documents that provide guidance to local authorities and others on national planning policy and the operation of the planning system. To replace PPGs.

RSS – Regional Spatial Strategy

The broad spatial strategy for the region prepared by the East of England Regional Assembly, and forming part of the statutory Development Plan.

SA – Sustainability Appraisal

An appraisal that must be created alongside development plan documents. They promote sustainable development by assessing the economic, environmental and social effects of planning .

SCI – Statement of Community Involvement

A document setting out how the community and others with an interest in the planning system will be involved

SEA – Strategic Environmental Assessment

A systematic assessment of the environment effects of a draft plan, which is open to public consultation and produced in accordance with national and European regulations.

SPD – Supplementary Planning Document

A document that provides additional or supporting detail to a policy or proposal contained within a development plan document.

Sustainable Development

A commonly accepted definition of Sustainable Development is development which enables people to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations.

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