



Elmsett Neighbourhood Plan

Site Assessment
Final Report

September 2018

Quality information

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Abbreviations used in the report

Abbreviation

BMSDC	Babergh and Mid-Suffolk District Councils
DEFRA	Department of the Environment, Food and Rural Affairs
DPD	Development Plan Document
EPC	Elmsett Parish Council
Ha	Hectare
JLP	Joint Local Plan
NP	Neighbourhood Plan
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	National Planning Policy Framework
PDL	Previously Developed Land
PPG	Planning Policy Guidance (DCLG)
SHELAA	Strategic Housing and Economic Land Availability Assessment
SPD	Supplementary Planning Document
TPO	Tree Preservation Order

Executive Summary

Background

Site selection and site allocations are one of the most contentious aspects of planning, raising strong feelings amongst local people, landowners, developers and businesses. It is important that any selection process carried out is transparent, fair, robust and defensible and that the same criteria and process is applied to each potential site. Equally important is the way in which the work is recorded and communicated to interested parties so the approach is transparent and defensible.

The Elmsett Neighbourhood Plan, which will cover the whole of Elmsett Parish, is being prepared in the context of the adopted Babergh Part 1 Local Plan 2011-2031 Core Strategy and Policies (2014), the saved policies from the Babergh Local Plan 2006 (as of June 2016) and with regard to the emerging Joint Local Plan. The Steering Group have confirmed to AECOM that that housing target up to 2036 will be a maximum of 60 dwellings. However the majority of this housing requirement has already been met through recent planning permissions (41 dwellings B/17/01009 and 7 dwellings B/16/00447); therefore only 12 dwellings are outstanding.

A number of sites were identified for potential development within Elmsett through the Babergh and Mid Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA) (August 2017). AECOM has undertaken an assessment of these sites to ascertain which sites are the most appropriate to allocate within the Neighbourhood Plan.

Site Appraisal Summary

The site assessment has found that three sites assessed would be potentially appropriate for allocation for housing in the Neighbourhood Plan, if identified site specific constraints can be resolved or mitigated. The remainder of the sites are not considered suitable for allocation in the Neighbourhood Plan. From the shortlist of potentially suitable sites, the Steering Group can select a site or sites for allocation in the Neighbourhood Plan that can be justified as the most suitable to meet the housing need for the area and the neighbourhood plan objectives and policies subject to resolution of planning constraints. Site selection should be discussed further with BMSDC to align the neighbourhood plan with strategic policy of the emerging Joint Local Plan.

1. Introduction

1.1 Background

This report is an independent site appraisal for the Elmsett Neighbourhood Plan on behalf of Elmsett Parish Council (EPC) as part of the Neighbourhood Planning Support programme¹. The work undertaken was agreed with the Parish Council and the Ministry of Housing, Communities and Local Government (MHCLG) in May 2018.

The Neighbourhood Plan is being prepared in the context of the adopted Babergh Part 1 Local Plan 2011-2031 Core Strategy and Policies (2014), the saved policies from the Babergh Local Plan 2006 (as of June 2016) and with regard to the emerging Joint Local Plan. The emerging Joint Local Plan, which will cover the period up to 2036, will provide a framework for how future development across Babergh and Mid Suffolk (which is a separate Council to Babergh but together they are preparing a Joint Local Plan) will be planned and delivered. Once adopted, the new Joint Local Plan will replace the existing local planning policies for Babergh and Mid Suffolk.

The emerging Joint Local Plan Issues and Options was at consultation stage (Reg 18) (as of August 2017) until November 2017. The most recent Local Development Scheme (July 2018) states that a draft Local Plan Preferred Options and Consultation (Reg 18) is planned to be realised for consultation in late 2018. The emerging Joint Local Plan will focus on strategic issues and priorities including the Council's overall strategy for where development should be located. It will also tackle issues that are of particular importance locally, such as affordable housing, and the preservation of a healthy, natural and attractive environment. The draft document does not, at this stage, propose the allocation of any sites for development, but readily identifies potential development sites and proposed draft new settlement boundaries to accommodate the District's development needs and requirements. The location of the allocations will be dependent upon the spatial distribution of development and the suitability and deliverability of development proposals.

The emerging and adopted Local Plans are also important in setting the framework for the development of neighbourhood plans. Neighbourhood plans are required to be in conformity with the strategic policies of the adopted Core Strategy and Local Plan. It is also good practice for the Neighbourhood Plan to be aligned with the emerging Joint Local Plan, because if the emerging Joint Local Plan is made, and there are conflicting policies with the Neighbourhood Plan, the Neighbourhood Plan will then be considered out of date. However the neighbourhood plan can also develop policies and proposals to address local place-based issues. In this way, it is intended for the Joint Local Plan to provide a clear overall strategic direction for development in Elmsett, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

Figure 1-1 provides a map of the Elmsett Neighbourhood area, which covers the parish of Elmsett. This was designated as the Neighbourhood Development Plan area by Babergh District Council in October 2017. It is the intention of the Neighbourhood Plan Steering Group that the Plan will include allocations for housing, and the group is now looking to ensure that key aspects of their proposals will be robust and defensible.

Elmsett is proposed as a Core Village in the settlement hierarchy for the emerging Joint Local Plan. This would promote its status from a Hinterland Village. However, the Council have confirmed orally to the steering group that the village is in fact likely to remain as a Hinterland Village in the adopted Joint Local Plan.

The Steering Group has produced their own evidence on the potential housing figure for the parish and have confirmed that it will be at a maximum 60 dwellings up until the plan period of 2036. This has also been confirmed by BMSDC². The majority of this housing need has already been met through recent planning permissions (41 dwellings B/17/01009 and 7 dwellings B/16/00447); therefore only 12 dwellings are outstanding. BMSDC have confirmed to the Steering Group that these two recent planning permissions count towards the housing target.

In this context, the Parish Council has asked AECOM to undertake an independent and objective assessment of the sites that have been identified as potential candidates for housing in the Neighbourhood Plan, including sites emerging from the Strategic Housing and Economic Land Availability Assessment.

The purpose of the site appraisal is therefore to confirm which, if any, of the identified sites are appropriate for allocation in the Plan, in particular whether they comply with both National Planning Practice Guidance and the strategic policies of Babergh's adopted Core Strategy and take regard of the emerging Joint Local Plan; and from this pool of sites, which are the best sites to meet both the housing need and the objectives of the

¹ More information available at <https://neighbourhoodplanning.org/>

² It is recommended that EPC provide the evidence to substantiate this housing need figure as part of the submission of the Neighbourhood Plan.

Neighbourhood Plan. It is anticipated that the Neighbourhood Planning site selection process, aided by this report, will be robust enough to meet the Basic Conditions considered by the Local Planning Authority and the Examiner, as well as any potential legal challenges by developers and other interested parties.

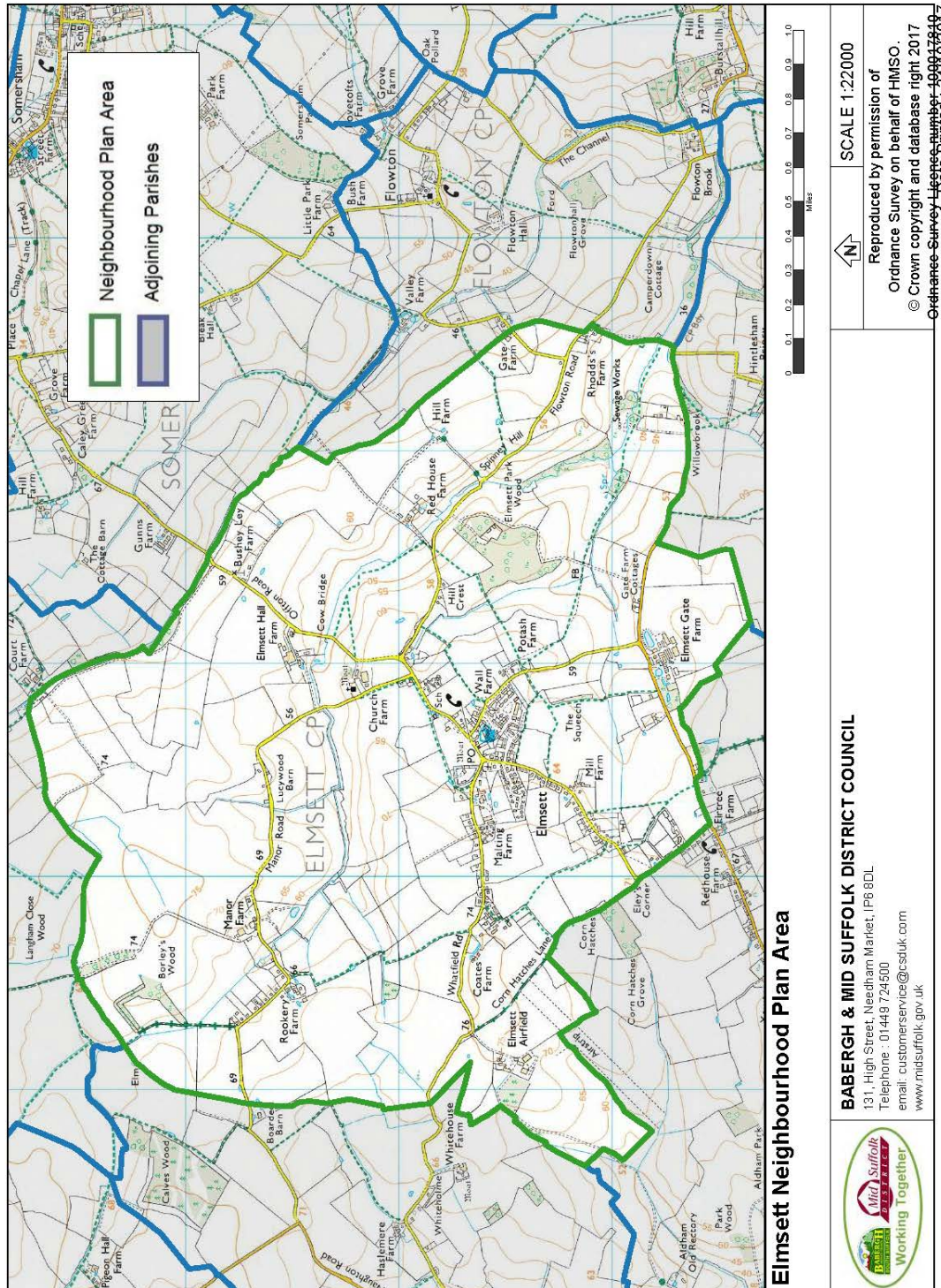


Figure 1-1: Elmsett Neighbourhood Plan Boundary

(Source: Babergh & Mid Suffolk District Council Website)

1.2 Planning Policy and Evidence Base

The Neighbourhood Plan policies and allocations must be in accordance with the strategic policies of the Local Plan, and should have regard to the emerging Local Plan. The Local Plan evidence base also provides a significant amount of information about potential developments in Elmsett.

The key documents for Babergh District Council planning framework includes:

- Adopted Babergh Part 1 Local Plan 2011-2031 Core Strategy & Policies, February 2014³;
- Saved Policies from the Babergh Local Plan 2006, as of June 2016⁴;
- Rural Development & Core Strategy Policy CS11 Supplementary Planning Document (SPD), August 2014⁵;
- Joint Local Plan Consultation Document, August 2017⁶;
- Babergh and Mid Suffolk Joint Strategic Housing and Economic Land Availability Assessment Draft, August 2017⁷; and
- Ipswich and Waveney Housing Market Areas: Strategic Housing Market Assessment. May 2017⁸.

Figure 1-2 is taken from Babergh and Mid Suffolk District Councils Interactive Web Map Layers⁹. This shows that a Special Landscape Area washes over the land to the south of Elmsett. Policy CR04 Special Landscape Areas of the Saved Policies applies here. There are also large areas of Tree Preservation Orders (TPO) which are designated as Ancient Woodlands. Elmsett Park Wood is also a Site of Special Scientific Interest (SSSI). Policy CS15: Implementing Sustainable Development in Babergh of the adopted Core Strategy (2014) applies here.

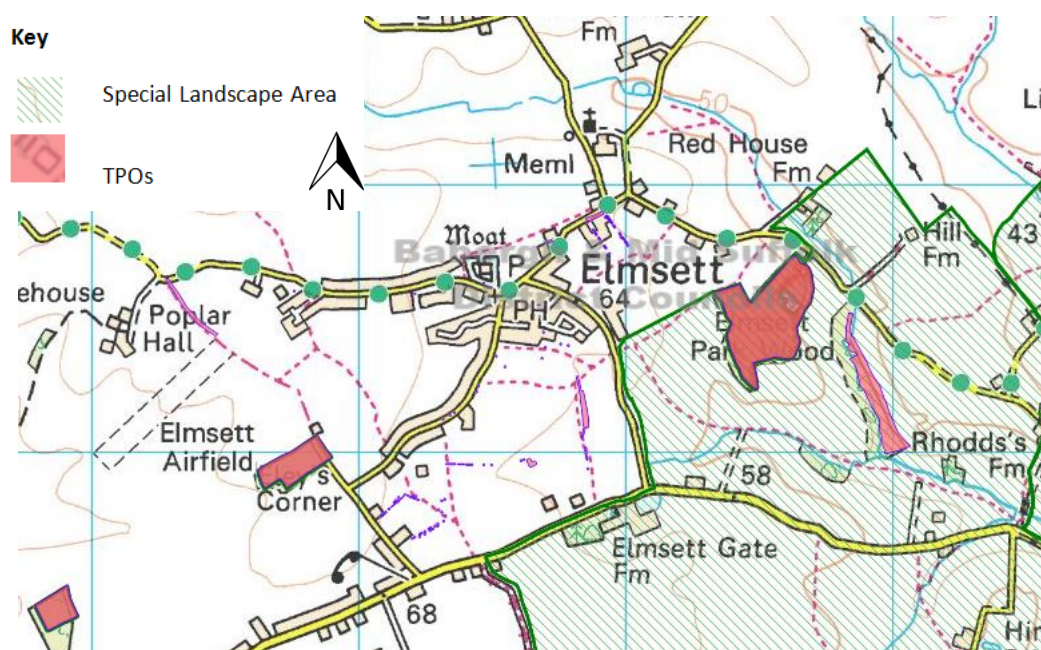


Figure 1-2: Planning and Environment designations within northern Elmsett

(Source: Babergh & Mid Suffolk District Council Website)

³ Available at <https://www.babergh.gov.uk/assets/Strategic-Planning/Babergh-Core-Strategy/CORE-STRATEGY-AND-POLICIES-FINAL-Feb-2014.pdf>

⁴ Available at <https://www.babergh.gov.uk/planning/planning-policy/adopted-documents/babergh-district-council/babergh-local-plan/>

⁵ Available at <https://www.babergh.gov.uk/assets/Strategic-Planning/SPD-Babergh/CS11-SPD-Adoption-Version.pdf>

⁶ Available at <http://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-consultation-document/>

⁷ Available at <http://www.midsuffolk.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Draft-BMSDC-Joint-SHELAA-Report-August-2017.pdf>

⁸ Available at <http://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Ipswich-and-Waveney-Housing-Market-Areas-Strategic-Housing-Market-Assessment-Part-1-May-2017.pdf>

⁹ Available at Available at <http://maps.midsuffolk.gov.uk/>

1.2.1 Adopted Babergh Part 1 Local Plan 2011-2031 Core Strategy & Policies (February 2014)

The policies of relevance to development in Elmsett include:

Policy CS2: Settlement Pattern Policy – The development strategy for Babergh is planned to a time horizon of 2031. Elmsett is identified as a Hinterland Village. These villages will accommodate some development to help meet the needs within them. All proposals will be assessed against Policy CS11.

Policy CS3: Strategy for Growth and Development – Babergh District Council will make provision for 5,975 new dwellings between 2011 and 2031 in the District. 1,050 of these new dwellings are planned in the Core and Hinterland Villages.

This housing figure was written on the basis that the amount of new development and locations for it would be dealt within a Site Allocations Document. A Site Allocations Document may not be prepared for some time and in the meantime proposals for Core and Hinterland Villages will be considered on the basis of the policies in the Core Strategy and the guidance set out in Rural Development & Core Strategy Policy CS11 SPD (2014).

Policy CS11: Strategy for Development for Core and Hinterland Villages – Development in Hinterland Villages will be approved where proposals are able to demonstrate a close functional relationship to the existing settlement on sites where the relevant issues listed are addressed to the satisfaction of the local planning authority:

- i. The landscape, environmental and heritage characteristics of the village;
- ii. The locational context of the village and the proposed development (particularly the AONBs, Conservation Areas, and heritage assets);
- iii. Site location and sequential approach to site selection;
- iv. Locally identified need – housing and employment, and specific local needs such as affordable housing;
- v. Locally identified community needs; and
- vi. Cumulative impact of development in the area in respect of social, physical and environmental impacts.

The proposed development should also:

- i. Be well designed and appropriate in size / scale, layout and character to its setting and to the village;
- ii. Be adjacent or well related to the existing pattern of development for that settlement;
- iii. Meet a proven local need, such as affordable housing or targeted market housing identified in an adopted neighbourhood plan;
- iv. Support local services and/or creates or expands employment opportunities; and
- v. Not compromise the delivery of permitted or identified schemes in adopted community / village local plans within the same functional cluster.

Policy CS15: Implementing Sustainable Development in Babergh – Proposals for development must ensure adequate protection, enhancement, compensation and / or mitigation, as appropriate are given to distinctive local features which characterise the landscape and heritage assets of Babergh's built and natural environment within designated sites covered by statutory legislation, such as AONBs, Conservation Areas, etc. and local designations such as Special Landscape Areas and County Wildlife Sites, and also local features and habitats that fall outside these identified areas. In particular proposals should protect and where possible enhance the landscape and heritage areas including habitats and features of landscape, historic, architectural, archaeological, biological, hydrological and geological interest.

1.2.2 Saved Policies from the Babergh Local Plan 2006, as of 2016

The policies of relevance to development in Elmsett include:

Policy HS28 Infill – Planning applications for infilling or groups of dwellings will be refused where:

- The site should remain undeveloped as an important feature in visual or environmental terms;

- The proposal represents overdevelopment to the detriment of the environment, the character of the locality, residential amenity or highway safety;
- The layout provides an unreasonable standard of privacy, garden size or public open space; and
- The proposal is of a scale, density or form which would be out of keeping with adjacent and nearby dwellings or other buildings.

Policy CR04 Special Landscape Areas – Development proposals in Special Landscape Areas will only be permitted where they:

- Maintain or enhance the special landscape qualities of the area, identified in the relevant landscape appraisal; and
- Are designed and sited so as to harmonise with the landscape setting.

Policy CR08 Hedgerows – Where development proposals affect hedgerows of amenity or landscape significance, planning permission will only be granted where:

- Hedgerows are retained in full, or
- Suitable mitigation such as replacement planting and management programmes are proposed.

Policy CN01 Design Standards – All new development proposals will be required to be of appropriate scale, form, detailed design and construction materials for the location. Proposals must pay particular attention to the scale, form and nature of adjacent development and the environment surrounding the site.

Policy CN06 Listed Buildings – Proposals for new work within the curtilage or setting of a listed building should not conceal features of importance or special interest; be of an appropriate scale, form, siting and detailed design to harmonise with the existing building and its setting; retain a curtilage area and / or setting which is appropriate to the listed building and the relationship with its setting; and respect those features which contribute positively to the setting of a listed building.

1.2.3 Rural Development & Core Strategy Policy CS11 SPD (August 2014)

This SPD provides guidance on the interpretation and application of Policy CS11 of the Babergh Core Strategy (2014). Based on the criteria listed within Policy CS11, it is considered that proposals put forward for consideration under Policy CS11 should have regard to the following matters:

Site location and relationship to settlement

Proposals must be in or adjacent to a Hinterland Village. Proposals should be well related to the existing settlement. It is suggested that the starting point for assessing this is whether or not the site adjoins the Built Up Area Boundary (BUAB) of the village. Some sites, even though they adjoin a BUAB, may not be well related to the village and a judgement will need to be made taking into account issues such as:

- Whether the proposal would constitute ribbon development on the edge of the village;
- The scale, character and density of the proposal in relation to the existing adjoining development;
- Whether the proposal constitutes a logical extension of the built-up area of the village; and
- Whether the proposal has logical, natural boundaries.

Sequential approach to site selection

When considering the suitability of sites for development, the Council will have regard to if in the first instance, whether there are other available, suitable and deliverable sites within the built-up area of the village. The next preferred location is sites which adjoin the built-up area of the village. Sites that do not adjoin the existing built-up area of the village will only be considered if there is special justification. Preference will also be given to brownfield sites where these are well located and meet sustainability criteria.

Scale of proposal in relation to existing settlement

In assessing the proposals, the Council will have regard to the fact that the total number of dwellings allocated to Core and Hinterland Villages by the Core Strategy for the period between 2011 and 2031 is a minimum of 1,050. The size and scale of any proposal should be proportionate to the settlement in which it is located. Because each village is different, it is not possible to prescribe standard proportions of development that would be acceptable. A judgement will need to be made on the basis of the size and character of the village, the services and facilities that are available and their capacity to accommodate further development.

As hinterland villages are generally smaller and have fewer services and facilities, it is expected that proposals for consideration will be smaller scale here. However some hinterland villages may be able to accommodate higher levels of development than others.

Cumulative impact taken with existing commitments or other proposals

They should include existing commitments and other proposals in the same village and cluster where they are likely to have a wider impact for example in terms of traffic generation, capacity of schools and health services.

Local needs

A key part of CS11 is that proposals should meet locally identified need. This should include an analysis of the number and types of dwelling in the village, an assessment of the need for housing in the village and the identification of any gaps in provision.

Availability of services and facilities

It is the range of services and facilities available that is important as this will have a bearing on the size and scale of development that can be accepted. The capacity of services and facilities and the ability of proposals to contribute towards their improvement also needs to be taken into account. The availability and frequency of public transport is also an important consideration. For walking distance, it is recommended:

- Desirable 400 metres
- Acceptable 800 metres
- Preferred Maximum 1,200 metres

These distances should be considered alongside the quality and continuity of the footpath connection. Connections between any proposal and village services and facilities should be continuous and have a good quality surface.

Sustainability

Proposals should have regard to paragraph 7 of the NPPF¹⁰ which refers to three dimensions of sustainable development; economic, social and environmental.

Constraints and impacts

Proposals should have regard to issues such as:

- The impact on the character and appearance of the countryside;
- Environmental issues;
- Impact on the historic environment;
- Impact on any nationally or locally designated areas of landscape or ecological importance; and
- Contaminated land.

1.2.4 Babergh and Mid Suffolk Joint Local Plan: Consultation Document (August 2017)

The Babergh and Mid Suffolk Joint Local Plan consultation document sets out the strategy for growth in both Districts, indicating where development will take place up to 2036. Once adopted, the new Joint Local Plan will

¹⁰ This SPD was prepared in the context of the 2012 NPPF. The NPPF has now been replaced with a new NPPF published in July 2018 (hereafter referred to as the 2018 NPPF).

replace the existing local planning policies for Babergh. The Plan will set out a vision for the area and will include policies and land allocations.

The consultation document proposes a new settlement boundary for Elmsett, and proposed sites that are potentially suitable for allocation on the built up edge of Elmsett. The plan proposes to amend the designations/status of Elmsett in the new joint settlement hierarchy, from Hinterland Village to Core Village. This is based on a new methodology founded on a Services and Facilities Audit carried out in the summer of 2014 for Babergh. However, the Council have confirmed orally to the steering group that the village will instead be designated as a Hinterland Village in the next edition of the emerging Joint Local Plan.

With regard to the overall pattern of growth, district wide options propose that Hinterland Villages in Babergh will have to deliver between 5-15% of the districts growth. The council are considering which approach is the most sustainable to enable development in rural communities.

The council are also considering strategic priorities in relation to conservation of the historic environment, including landscape. Special Landscape Areas (SLAs) are local landscape designations which are identified in the adopted plans of both Districts. The approach towards landscape protection has evolved since the current Local Plan policies were put into place. Current practices re-evaluate landscape characteristics as a whole rather than identifying small pockets of deemed significance. The council are considering whether Special Landscape Area designations are to be maintained or removed, whereby all development would be expected to minimise impacts on the landscape and to enhance landscape character wherever possible.

The consultation document also includes inset maps identifying potential development sites, existing settlement boundaries and proposed draft new settlement boundaries, as seen in **Figure 1-3** for Elmsett.

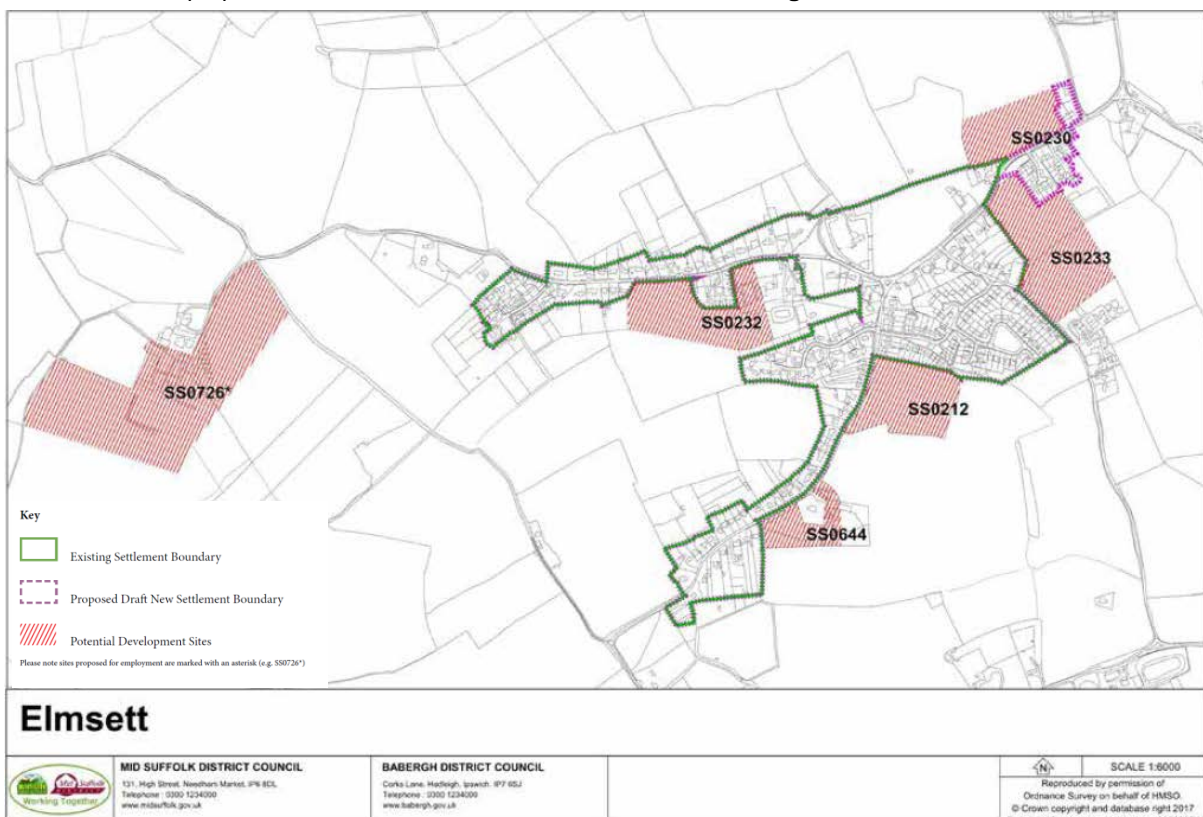
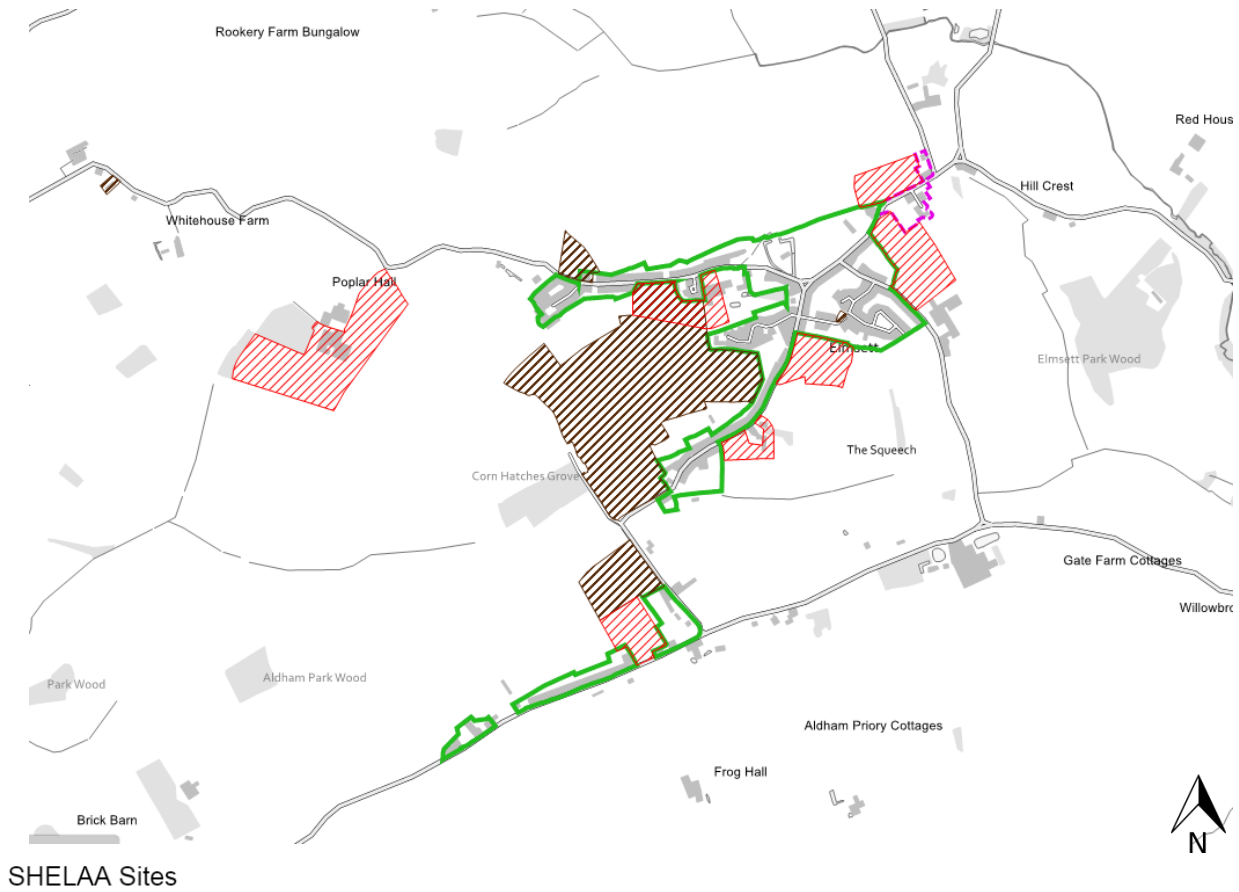


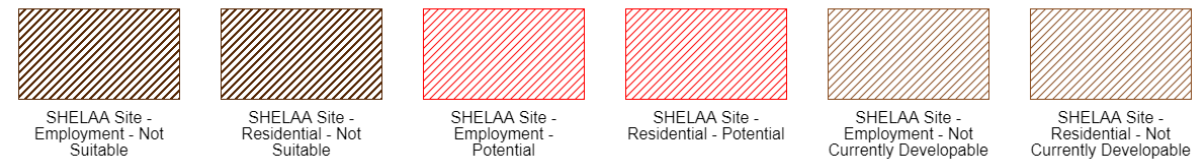
Figure 1-3: Inset map for Elmsett

(Source: Babergh & Mid Suffolk District Council Website)

The consultation document was released for consultation (Reg 18) alongside an interactive online mapping which identifies further SHELAA sites that were found to not be suitable for residential and employment development and sites that have potential for residential and employment development, as seen in **Figure 1-4** for Elmsett.



SHELAA Sites



Settlement Boundaries

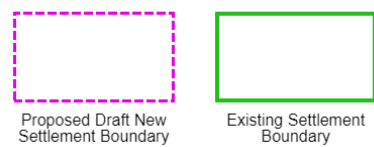


Figure 1-4: Consultation Map identifying SHELAA sites and revised settlement boundary

(Source: Babergh & Mid Suffolk District Council Website)

1.2.5 Babergh and Mid Suffolk Joint Strategic Housing and Economic Land Availability Assessment (2017)

The implication of the emerging Local Plan is that Elmsett, and other villages and towns developing Neighbourhood Plans, will allocate the development needed through those Plans. However, BMSDC have assessed a number of sites in Elmsett through the technical work to support the Local Plan, specifically the Strategic Housing and Economic Land Availability Assessment (SHELAA) (August 2017). The SHELAA considered a total of nine sites for housing within the parish (six were accepted for further consideration and three rejected), see **Figure 1-4**.

1.2.6 Ipswich and Waveney Housing Market Areas: Strategic Housing Market Assessment (2017)

The Objectively Assessed Need from 2014-2036 for Babergh Local Authority area is 7,820 new dwellings, which equates to 355 new dwellings a year. However this figure only represents a 'starting point' in identifying housing requirements. There are a number of other factors that will be considered when setting the final figure in the Emerging Joint Local Plan.

2. Site Assessment Method

The approach to the site assessment is based on the Government's National Planning Practice Guidance. The relevant sections are Housing and economic land availability assessment (March 2015)¹¹, Neighbourhood Planning (updated Feb 2018)¹² and the Neighbourhood Planning Site Assessment Toolkit¹³. These all encompass an approach to assessing whether a site is appropriate for allocation in a Development Plan based on whether it is suitable, available and achievable (or viable).

In this context, the methodology for carrying out the site appraisal is presented below.

2.1 Task 1: Identify Sites to be included in the Assessment

The first task is to identify which sites should be considered as part of the assessment.

For the Elmsett Neighbourhood Plan, this entailed all SHELAA sites that were assessed as being suitable for further consideration, available and achievable for development.

All sites included in the assessment are shown on **Figure 3-1**.

2.2 Task 2: Gathering Information for Site Assessments

The next task was to gather the relevant information for the site assessments. This was done through a combination of desktop assessment and site visits. The desktop assessment involved a review of the conclusions of the existing evidence and using other sources including google maps/streetview and MAGIC maps, in order to judge whether a site is suitable for the use proposed. The site visits allowed the team to consider aspects of the site assessment that could only be done visually. It was also an opportunity to gain a better understanding of the context and nature of the neighbourhood plan area. Key considerations were examined to expand the SHELAA conclusions and allow for greater clarity for the steering group on the opportunities and constraints of each of the sites. These key considerations included environmental and heritage designations, planning history, access and landscape.

2.3 Task 3: Consolidation of Results

Following the site visit, the desk top assessment was revisited to finalise the assessment and compare the sites to judge which were the most suitable to meet the housing requirement.

A 'traffic light' rating of all sites has been given based on whether the site is an appropriate candidate to be considered for allocation in the Neighbourhood Plan. The traffic light rating indicates 'green' for sites that show no constraints and are appropriate as site allocations, 'amber' for sites which are potentially suitable if issues can be resolved and 'red' for sites which are not currently suitable. The judgement on each site is based on the three 'tests' of whether a site is appropriate for allocation – i.e. the site is **suitable, available and achievable**.

The conclusions of the SHELAA were revisited to consider whether the conclusions would change as a result of the local criteria.

2.4 Indicative Housing Capacity

As all sites were previously included in the SHELAA, therefore the indicative housing capacity shown in the SHELAA has been used.

Lower densities may be appropriate to apply to the sites in the Neighbourhood Plan than suggested in this report due to the rural nature of the settlement and the relatively low housing requirement of Elmsett. It is recommended that the number of houses allocated per site is consistent with the existing densities of the village and appropriate for the context and setting, taking into account the site-specific characteristic and constraints.

¹¹ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

¹² <https://www.gov.uk/guidance/neighbourhood-planning--2>

¹³ <https://neighbourhoodplanning.org/toolkits-and-guidance/assess-allocate-sites-development/>

3. Site Assessment

3.1 Identified Sites

The 2017 Babergh and Mid Suffolk Joint Strategic Housing and Economic Land Availability Assessment considered sites in Elmsett that could be suitable for housing and employment. The sites in **Table 3.1** were found to be suitable, available, and achievable during the plan period.

Table 3.1: Sites Identified in the SHELAA (2017) that were suitable

Site Ref.	Site Address	Area (Ha)	Estimated Dwellings Yield
SS0212	Land west of Hadleigh Road	2.56	20
SS0230	Land to the north of The Street	1.74	20
SS0232	Land south of Whatfield Road	3.10	20
SS0233	Land north east of Ipswich Road	3.80	30
SS0644	Land south of Hadleigh Road	1.30	8
SS0726	Land to the south of Corn Hatches Lane, Elmsett	8.16	Employment

Three sites identified in the 2017 SHELAA were not considered to be suitable for development. These are presented in **Table 3.2**.

Table 3.2: Sites Identified in the SHELAA (2017) that were not suitable

Site Ref.	Site Address	Reason
SS0483	Garrards Road, Elmsett	More than 50% identified within surface water flood area.
SS0713	Land to the north of Whatfield Road, Elmsett	It is disjointed and disproportionate and development of the site would have a detrimental impact on the existing settlement.
SS0715	Land between Whatfield Road and Hadleigh Road, Elmsett	Disproportionate in scale for the existing settlement and location.

3.2 Sites Considered through the Site Appraisal

Sites to be considered through the site appraisal have therefore been selected via the following methods:

- SHELAA sites in Elmsett that currently have potential for housing development, i.e. they are suitable, available and viable.

SHELAA site SS0726 has not been included within this site assessment as the group are only looking to allocate sites for housing.

Figure 3-1 shows all sites to be included in the assessment on a map.

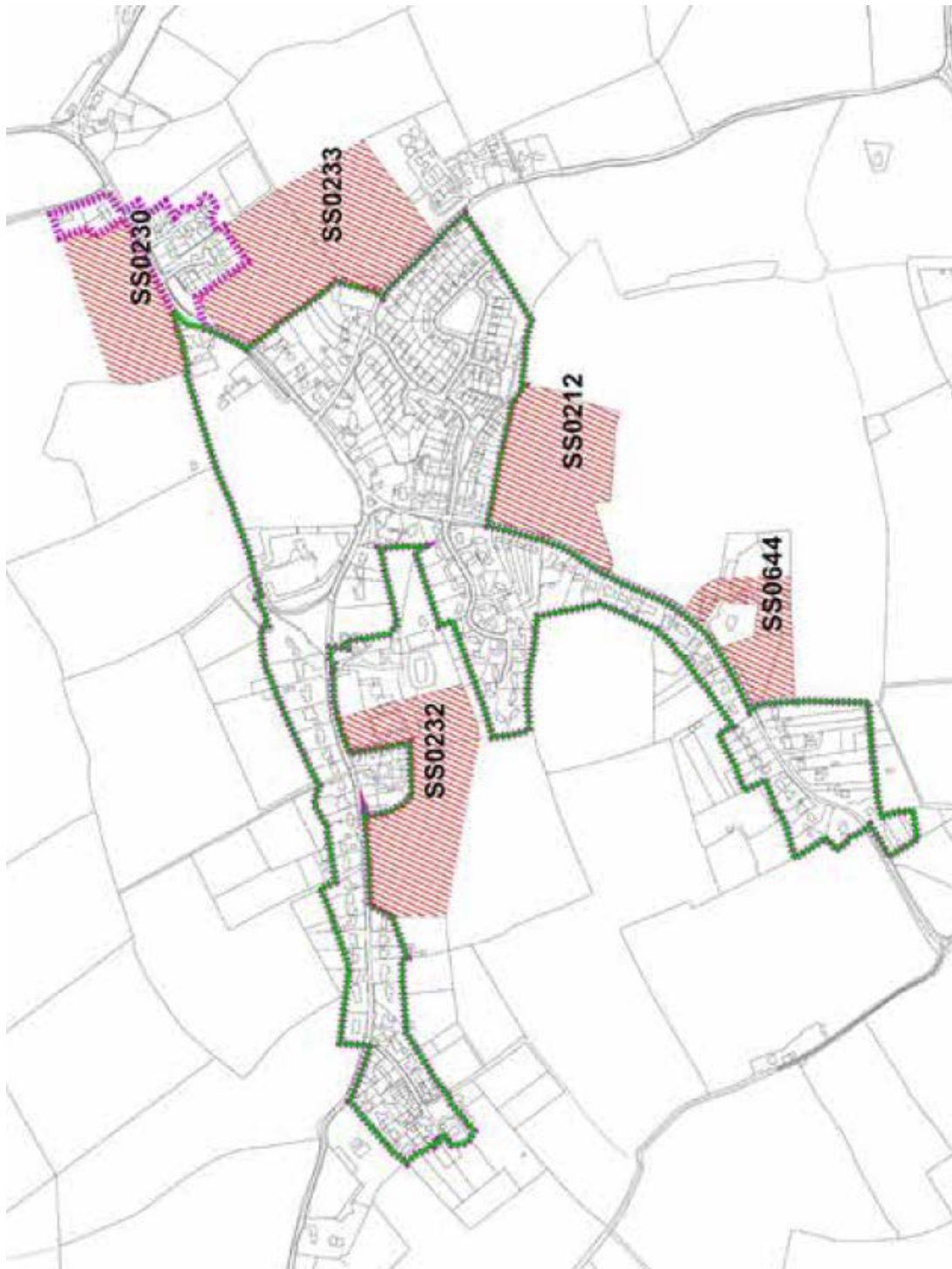


Figure 3-1: Sites to be taken forward in this assessment (Source: Babergh and Mid Suffolk District Councils)

4. Site Appraisals

A number of sites were assessed to consider whether they would be appropriate for allocation in the Elmsett Neighbourhood Plan. These sites were submitted through the 2017 Babergh and Mid Suffolk Joint Strategic Housing and Economic Land Availability Assessment (SHELAA) and found to be suitable, available and viable for development. The SHELAA assessed all sites regardless of policy. However the Neighbourhood Plan is only aiming to allocate land to meet its modest housing requirement for up to 60 dwellings up to 2036. Moreover, majority of this housing need has already been met through recent planning permission (41 dwellings B/17/01009 and 7 dwellings B/16/00447); and therefore only 12 dwellings are outstanding. Therefore the majority of the large sites shown in the SHELAA as suitable for development would not be appropriate as housing allocation if allocated as an entire site in the Neighbourhood Plan. As a result, the sites have been examined in the context of only part allocation, to take account of the housing requirement.

Table 4.1 to **Table 4.5** set out the site assessments for each suitable SHELAA site. This includes the SHELAA conclusion regarding each SHELAA sites' 'developability'. Other key considerations were examined to expand the SHELAA conclusions and allow for greater clarity for the steering group on the opportunities and constraints of each of the sites. These key considerations included environmental and heritage designations, planning history, access and landscape. This assessment has also taken into account the potential for allocating part of the sites identified in the SHELAA.

The final row of each table is a 'traffic light' rating for each site, indicating whether the site is appropriate for allocation. Red indicates the site is not appropriate for allocation through the Neighbourhood Plan. Green indicates the site is appropriate for allocation through the Neighbourhood Plan. Amber indicates the site is less suitable, or may be appropriate for allocation through the Neighbourhood Plan if certain issues can be resolved or constraints mitigated.

All sites are considered to be available for development, as they were assessed as available in the SHELAA.

The site appraisal tables below show that there is one SHELAA site that is considered to be appropriate for allocation through the Neighbourhood Plan. Another site was found to also to be appropriate for development but does not need to be allocated due to an extant planning permission for the site. Two of the sites are potentially considered to be appropriate for allocation but have significant constraints that would need to be mitigated or resolved. Finally, one of the sites is not considered suitable for allocation, even though it was found suitable for development in the SHELAA assessment. Key site constraints include limited current and potential access and limited safe pedestrian access to the site from the centre of Elmsett.

4.1 SS0212: Land west of Hadleigh Road



Table 4.1 Site SS0212 appraisal

Consideration	Comment
Site Type	Greenfield
Site Area (ha)	2.56
Capacity (no. dwellings)	20 (SHELAA estimated dwelling yield)
SHELAA conclusions	<p>Site is potentially suitable but the following considerations would require further investigation:</p> <ul style="list-style-type: none"> • Highways – regarding access, footpaths and infrastructure required; and • Biodiversity – protected species identified on site. <p>Only part development is recommended in order to avoid disproportionate development to the existing settlement.</p>
Environmental and heritage designations and considerations	There are a number of TPOs on the site boundaries. The site is fallow land which could hold some ecological potential.
Planning history	Outline planning permission approved 27 th June 2018 (B/17/01009); for a residential development of 41 dwellings to include market and affordable housing, new vehicular access, wildlife areas, amenity space and community woodland.
Access	The site is flat. The site is favourably located in proximity to the centre of services and facilities in Elmsett and has safe pedestrian routes to the centre. New vehicular access has been approved with the outline planning permission.
Landscape	The site has some existing screening through tree cover and hedgerow but there are views of medium sensitivity of the open countryside from Hadleigh Road that may require mitigation if housing is built on the site.
Conclusion	The site is considered suitable for allocation. However, as the site already has planning permission (for 41 dwellings) the site does not need to be allocated, unless EPC chose to do so in support of development on this site or as a contingency if the planning permission is not built out.
Rating	

4.2 SS0230: Land to the north of The Street



Table 4.2 Site SS0230 appraisal

Consideration	Comment
Site Type	Greenfield
Site Area (ha)	1.74
Capacity (no. dwellings)	20 (SHELAA estimated dwelling yield)
SHELAA conclusions	<p>Site is potentially suitable, but the following considerations would require further investigation:</p> <ul style="list-style-type: none"> • Highways – regarding access, footpaths and infrastructure required; • Townscape – development of whole site would be detrimental to townscape; • Compatibility – development of whole site would create compatibility issues; and • Flood Risk – surface water flooding identified on site. <p>Potential land use could include residential development, as well as potential provision of allotments and / or land for extension to the existing adjacent primary school.</p> <p>Only part development is recommended to avoid disproportionate development to the existing settlement.</p>
Environmental and heritage designations	<p>The Grade I listed building, the Church of St Peter, with a Grade II listed building is located 250m to the north-east of the site. However, views to these listed buildings from the site are restricted because of existing screening. There may be some ecological potential on the site as it is a fallow field. A Phase 1 Habitat Survey will be required for any planning application. The SHELAA notes that surface water flooding has been identified on the site. However there is no evidence of this on the Environment Agency flood map service. Therefore this is not a constraint to development but any planning application should screen this within an Environmental Impact Assessment (EIA) and/or Flood Risk Assessment.</p>
Planning history	None relevant.
Access	<p>The site is located in moderate proximity to the centre of services and facilities in Elmsett and has safe pedestrian access to the village centre. The site currently has limited vehicular access but has potential for new suitable access to be created due to limited hedgerows.</p>
Landscape	<p>Development on this site would continue the existing settlement form, however there are views across the site of open countryside and of the landmark tower of the parish Church of St. Peter. There are also views towards Elmsett on approach from Manor Road. The northern boundary of the site is open and undefended, whereby the site continues into adjacent agricultural land. A soft landscape buffer would be required to mitigate a hard built edge forming.</p>
Conclusion	<p>The site is considered to be suitable for allocation but only part development is recommended to avoid disproportionate growth occurring that would have the potential of changing the size and character of the settlement. In addition, powerlines cross the site on the western side which may reduce the developable area. As the housing need for Elmsett is twelve homes, a lower density of development similar to the context of the site is recommended.</p>
Rating	

4.3 SS0232: Land south of Whatfield Road



Table 4.3 SS0232 appraisal

Consideration	Comment
Site Type	Greenfield
Site Area (ha)	3.10
Capacity (no. dwellings)	20 (SHELAA estimated dwelling yield)
SHELAA conclusions	<p>Site is potentially suitable, but the following considerations would require further investigation:</p> <ul style="list-style-type: none"> • Highways – regarding access, footpaths and infrastructure required; • Heritage – impact upon listed buildings adjacent to site; and • Flood Risk – surface water flooding identified on site. <p>Only part development is recommended to avoid disproportionate development to the existing settlement.</p>
Environmental and heritage designations	<p>Views of the Grade II listed building, The Chequers, are very open from the western section of the site. The land is a fallow field with mature trees and hedgerows on the boundaries which have potential for ecology value. The SHELAA notes that surface water flooding has been identified on the site, however there is no evidence of this on the environment agency flood map service. A Flood Risk Assessment would have to be carried out as part of a planning application.</p>
Planning history	<p>A planning application (DC/18/02316) was submitted for the western portion of the site on the 22nd May 2018 for residential development comprising 42 no. dwellings, incorporating 35% affordable homes, with the creation of new vehicular access and public open space. The application is awaiting decision.</p> <p>An outline planning application (DC/17/05204) was submitted on the 14th October 2017 for the south-eastern portion of the site for the erection of up to 18 no. dwellings, the erection of a commercial nursery and creation of vehicular access. The application is awaiting decision.</p> <p>Both of the above planning applications site boundaries extend beyond the SHELAA site boundary.</p> <p>The north-eastern portion of the site had planning permission (B/16/00447) granted on the 15th November 2017; for the erection of 7 no. dwellings and associated works, including the construction of a new vehicular access.</p>
Access	<p>The site is moderately located in proximity to the centre of services and facilities within Elmsett. However there is restricted safe pedestrian access to the site from the centre of Elmsett, with some parts of the route only having grass verges. This acts as a constraint to development.</p>
Landscape	<p>The site has existing screening from the surrounding area.</p>
Conclusion	<p>The north-eastern portion of the site has extant planning permission (for 7 dwellings), therefore this portion of the site does not need to be allocated, unless EPC chose to do so in support of development on this site or as a contingency if the planning permission is not built out.</p> <p>The remaining part of the site is considered suitable for allocation but has constraints that would need to be mitigated / resolved. These include the creation of safe pedestrian access. However as part of the wider site pedestrian access may already have been addressed as part of the extant planning permission. In addition, sensitive design would be required to mitigate any effect on the adjacent listed building.</p> <p>As the remaining housing need for Elmsett is twelve homes and the SHELAA finds that only part</p>

Consideration

Comment

development is recommended to avoid disproportionate development to the existing settlement, it is not considered necessary to allocate the whole of the site. The site is considered to be potentially suitable for development subject to the highlighted constraints and outstanding planning permission determinations.

Rating



4.4 SS0233: Land north east of Ipswich Road



Table 4.4 SS0233 appraisal

Consideration	Comment
Site Type	Greenfield
Site Area (ha)	3.80
Capacity (no. dwellings)	30
SHELAA conclusions	<p>Site is potentially suitable, but the following considerations would require further investigation:</p> <ul style="list-style-type: none"> • Highways – regarding access, footpaths and infrastructure required; • Heritage – impact upon listed building adjacent to site; • Townscape – development of whole site would be detrimental to townscape; • Compatibility – development of whole site would create compatibility issues; and • Landscape – TPOs identified along boundary. <p>Only part development (western or norther aspect of site) is recommended in order to avoid disproportionate development to the existing settlement.</p>
Environmental and heritage designations	<p>There are a number of TPOs along the eastern boundary. Elmsett Park Wood SSSI is less than 400m to the south-east of the site, which may result in an EIA being needed to establish if development does not have an adverse impact on this ecologically protected site.</p> <p>There are a number of Grade II Listed Buildings to the west of the site. However there is existing screening of the site to these Listed Buildings.</p>
Planning history	None relevant.
Access	The site is moderately located in proximity to the centre of services and facilities in Elmsett. Access to the site is unknown. Access created off the Street would be difficult because of an existing large ditch and small pond. There is possibility of access from the adjacent new development, but it is unclear whether the access point is part of the road or a private drive. There is potential for access to be created off Ipswich Road, but safe pedestrian access to the centre of services from this point does not exist along the entire route.
Landscape	The site is open to the road but has existing screening to the remaining views of the countryside.
Conclusion	<p>The site is considered potentially suitable for allocation subject to identified constraints being resolved and developable area of site being redefined.</p> <p>As the remaining housing need for Elmsett is twelve homes and the SHELAA finds that only part development of the western or northern aspect of the site is recommended to avoid disproportionate development to the existing settlement, it is not considered necessary to allocate the whole of the site.</p>
Rating	

4.5 SS0644: Land south of Hadleigh Road



Table 4.5 SS0644 appraisal

Consideration	Comment
Site Type	Greenfield
Site Area (ha)	1.30
Capacity (no. dwellings)	8
HELAA conclusions	<p>Site is potentially suitable, but the following considerations would require further investigation:</p> <ul style="list-style-type: none"> • Highways – regarding access, footpaths and infrastructure required; • Townscape – development of whole site would be detrimental to townscape; • Compatibility – development of whole site would create compatibility issues; • Landscape – TPOs identified along boundary; and • Flood risk- surface water flooding (1000yr) identified on site. <p>Only part development (western aspect of site) is recommended in order to avoid disjointed development to the existing settlement.</p>
Environmental and heritage designations	There are a number of TPOs along the northern boundary. These may restrict access in the western portion of the site. The trees on the boundaries also have a high potential to have high ecological value.
Planning history	None relevant.
Access	The site is located in moderate proximity to the centre of services and facilities in Elmsett. There is existing access off Hadleigh Road which has potential for upgrading to be suitable for access to development. Hadleigh Road has limited safe pedestrian footpaths on it, with some grass verges, but a lot of the route has nowhere to walk on except the road to connect pedestrians to the village centre.
Landscape	There are no views into or out of the site due to mature trees and hedgerows screening the site.
Conclusion	<p>Although the SHELAA finds the site potentially suitable for development , a sequential test finds the site is unsuitable for allocation as a logical extension to the village when compared to other sites due to the following:</p> <ul style="list-style-type: none"> • Distance to village centre and facilities; • Lack of safe pedestrian footpaths along Hadleigh Road; • Growth of settlement in unsustainable direction compared to other site options.
Rating	

5. Conclusions

5.1 Site Assessment Conclusions

Five sites were assessed to consider whether they would be appropriate for allocation in the Elmsett Neighbourhood Plan to meet an identified housing need of two dwellings. These included sites that were submitted through the 2017 Babergh and Mid Suffolk Joint Strategic Housing and Economic Land Availability Assessment (SHELAA) and found to be suitable, available and achievable for development.

The site assessment should be viewed in the context of the adopted and emerging strategic policies of Babergh District Council. Elmsett is indicated to be designated as a Core Village in the settlement hierarchy for the emerging Joint Local Plan. This would promote its status from a Hinterland Village. However, the Council have confirmed orally to the steering group that it is in fact likely to remain as a Hinterland Village in the adopted Joint Local Plan.

The Steering Group has produced their own evidence on the potential housing figure for the parish and have confirmed that it will be up to 60 dwellings up until the plan period of 2036. This has also been confirmed by BMSDC. The majority of this housing need has already been met through recent planning permissions (41 dwellings (Planning reference number: B/17/01009) and 7 dwellings (Planning reference number: B/16/00447)); therefore only 12 dwellings are outstanding to be provided for in the plan period.

Table 4.1 to **Table 4.5** set out the site assessment findings which are informed by the SHELAA conclusions.

The site appraisal tables show that Site SS0212 was found to be suitable for development, however as it has extant planning permission, it is not necessary for it to be allocated within the Neighbourhood Plan as its housing provision already counts towards the housing requirement for Elmsett. However, the Neighbourhood Steering Group may wish to allocate it in support of the development, or as a contingency if the planning permission is not built out.

Site SS0230 is also considered to be appropriate for allocation in the Neighbourhood Plan. This site has relatively few constraints, with limited environmental or heritage designations within or adjacent to the site. The site has existing safe pedestrian access from Elmsett village centre and there is good potential to create new a suitable access to the site. In addition, the development would relate well to the existing village.

There are two sites that are considered potentially appropriate for allocation but have constraints that would need mitigating or resolving. Site SS0232 has limited safe pedestrian routes to the centre of Elmsett and any development would need sensitive design to reduce development impact on the adjacent listed building. Site SS0233 has restricted access and limited safe pedestrian routes to the centre of Elmsett, and would be more suitable if the developable area of the site was reduced so as part development of the western or northern aspect of the site is considered to avoid disproportionate development to the existing settlement.

One of the sites is not considered suitable for allocation. Site SS0644 lacks safe pedestrian routes from the centre of Elmsett, is located further away compared to the other sites under consideration and growth here would be considered growth of the settlement in an unsustainable direction.

The site assessment therefore shows that there is one site that is potentially suitable to be put forward as a proposal for a housing allocation as part of the Elmsett Neighbourhood Plan, if the sites' identified constraints are resolved. Two other sites were found to be potentially suitable for development along their road aspects, rather than disproportionate development of the whole site. However, as the required remaining housing figure is only 12 homes, only part allocation is recommended on the chosen site/sites.

5.2 Next Steps

The next steps would be for the Neighbourhood Steering group to select the preferred site or sites to meet the approximate housing requirement of 12 dwellings.

The following sites are all potential candidates for allocation; SS0230, SS0232 and SS0233, although for a smaller amount of development than set out in the SHELAA because of the small housing requirement.

The site selection process should be based on the following:

- The findings of this site assessment;
- Discussions with Babergh District Council;
- The extent to which the sites support the vision and objectives for the Neighbourhood Plan; and
- The potential for the sites to meet identified infrastructure needs of the community, including through Community Infrastructure Levy contributions¹⁴.

5.3 Viability

As part of the site selection process, it is recommended that the Steering Group discusses site viability with Babergh District Council. Viability appraisals for individual sites may already exist. If not, it is possible to use the Council's existing viability evidence¹⁵ to test the viability of sites proposed for allocation in the Neighbourhood Plan. This can be done by 'matching' site typologies used in existing reports, with sites proposed by the Steering Group, to give an indication of whether a site is viable for development and therefore likely to be delivered. In addition, any landowner or developer promoting a site for development should be contacted to request evidence of viability.

¹⁴ Babergh and Mid Suffolk District Councils adopted the CIL Charging Schedules in January 2016, available here <https://www.babergh.gov.uk/planning/community-infrastructure-levy-and-section-106/community-infrastructure-levy-cil/>

¹⁵ Ipswich, Babergh, Mid Suffolk & Suffolk Coastal Affordable Housing Viability Study (June 2009), available here <https://www.babergh.gov.uk/assets/Strategic-Planning/Babergh-Core-Strategy/CoreStrategyCoreDocList/AffHsngSiteViabilityStudyJun09.pdf>

