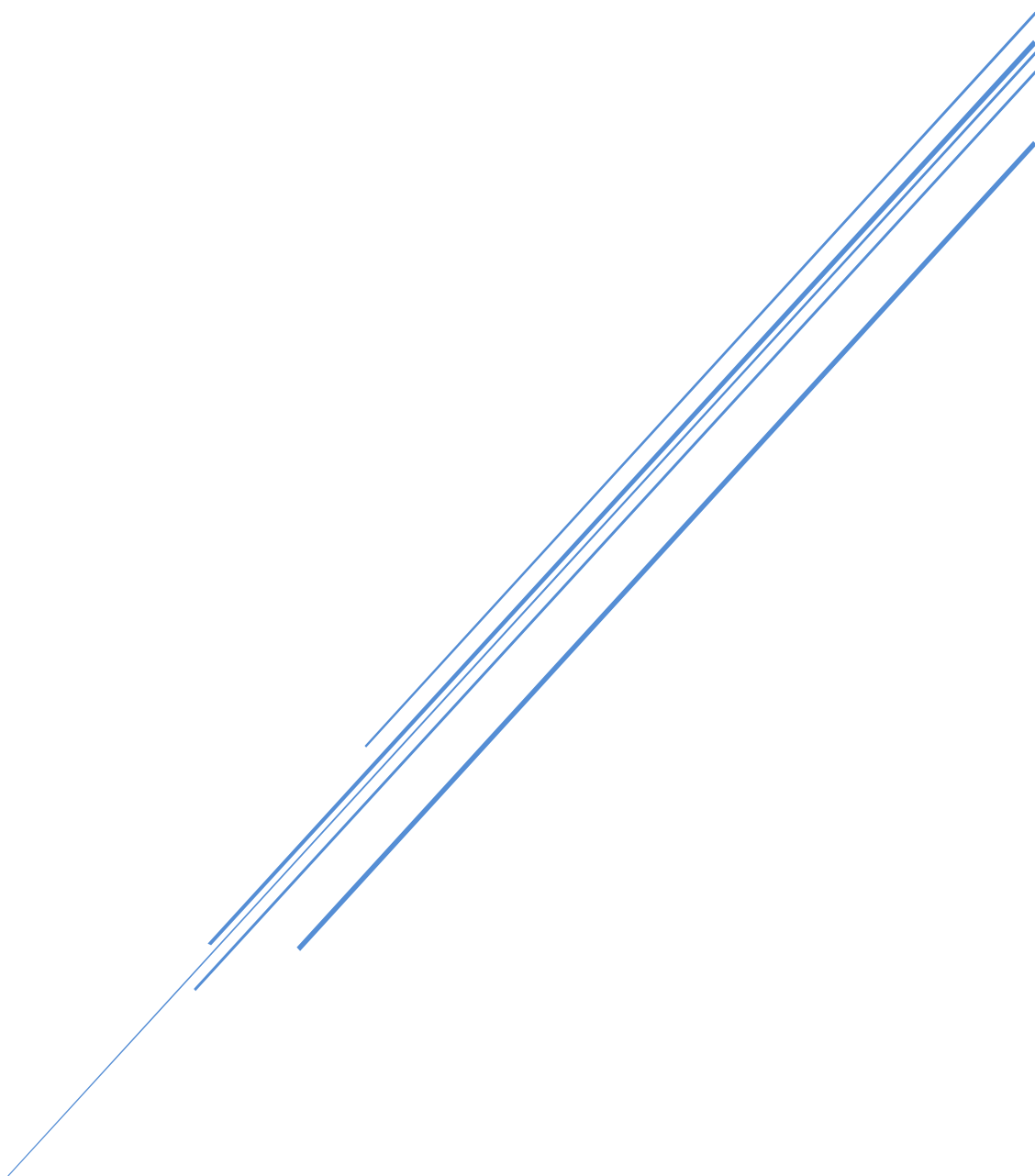


BABERGH & MID SUFFOLK JOINT LOCAL PLAN

Topic Paper: Infrastructure



March 2021

Joint Local Plan Topic Paper

Infrastructure

Purpose of topic paper –

This topic paper is one in a series in the [Core Document Library](#), which sets out how the policies within the Babergh and Mid Suffolk Joint Local Plan (JLP) have been developed. Each topic paper looks at the relevant national and local guidance that informs the Joint Local Plan. Topic papers explain how the policies have developed, and also provides information, evidence and feedback that have informed the choices made in formulating the policies.

The intention of the topic papers is to provide background information, however they do not contain the policies, proposals or site allocations. Topic papers have been produced to accompany the Joint Local Plan through the process to adoption.

The issues covered by this topic paper are:

1. The national policy context for infrastructure.
2. An overview of key evidence which has been used to inform the policy approach taken in the Joint Local Plan.
3. An appraisal of the local infrastructure context and policy considerations from made Neighbourhood Plans.
4. An overview of how the consultation stages (August 2017, July 2019 and November 2020) has shaped the Joint Local Plan Policies which deal with infrastructure.
5. Conclusion on the policy approach

NATIONAL POLICY CONTEXT

National context

Local plan policies must be positively prepared, justified, effective and consistent with national policy and legislation. The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework, supported by Planning Practice Guidance (PPG). Legislation and statements from government.

National planning policy and guidance

The role of planning as a delivery mechanism for sustainable communities is reflected in the increasing emphasis on infrastructure planning in the NPPF.

The table below shows the key policies of the NPPF which refer to infrastructure, and how the requirements are addressed through the policies of the Joint Local Plan.

Table 1. NPPF policies which refer to infrastructure and how the requirements are addressed through the policies of the Joint Local Plan

Section 3. Plan-making	
<p>Para. 20 states –</p> <p><i>“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:</i></p> <p><i>b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</i></p> <p><i>c) community facilities (such as health, education and cultural infrastructure); and</i></p> <p><i>d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”</i></p>	<p>Paragraph 20 b) is dealt with through policy SP08 – Strategic Infrastructure Provision, where the key strategic infrastructure needs for the districts are listed within the policy, such as transport improvements to the strategic highway corridors (including modal shift / demand management), a district wide education expansion programme, the protected Habitat Mitigation Zones, upgrade of key water supply infrastructure and improvements to digital technology infrastructure.</p> <p>SP08 also makes clear that all development will need to make provision for appropriate contributions towards community infrastructure, where the relevant locality to the development proposal has been identified through the Infrastructure Delivery Plan.</p> <p>SP08 sets out the expectations of planning applications to include appropriate infrastructure provision, the policy also specifies that when planning decisions are made, regard will be given to the Infrastructure Delivery Plan and associated evidence base. Site allocations have been identified with the consideration of the availability, suitability and deliverability of sites, constraints (e.g. flood zones) and</p>

	infrastructure capacity / opportunities (para 09.08 of the JLP).
<p>Para. 34 states – <i>“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.”</i></p>	<p>Contributions for infrastructure provision that is expected from development is set out in the Infrastructure Delivery Plan (IDP), where the needs are identified together with estimated costs and expected funding mechanisms.</p> <p>Policy SP08, SP09 and LP35 aim to provide a policy framework for securing an appropriate level of infrastructure, including developer contributions and obligations. Requirements for proposed allocations are set out in each allocation policy and have been informed by the content of the IDP.</p> <p>Policy SP08 3) specifies that the required infrastructure will be provided through a combination of Community Infrastructure Levy (CIL), Planning Obligations, Developer Contributions and where appropriate funding assistance from the Councils / other provider organisations.</p> <p>Policy LP35 – Developer Contributions and Planning Obligations, also point to the different funding mechanisms to provide the required infrastructure and makes clear that when making planning decisions, regard must be given to the IDP, the consultation responses received from infrastructure providers and the associated Plan evidence base.</p> <p>Policy LP35 4) specifically mentions that the applicants shall adhere to the relevant documents endorsed by the Council detailing the types and priorities of infrastructure provision required for the districts.</p> <p>The IDP covers the following infrastructure areas:</p> <ul style="list-style-type: none"> - Schools and other educational facilities - Health and social wellbeing - Transport - Police - Emergency services - Utilities - Digital Connectivity - Waste - Social and community (including libraries, allotments and community halls)

	<ul style="list-style-type: none"> - Community facilities (including children's play, youth and sports facilities) - Green infrastructure and open space <p>The policy does not undermine the deliverability of the plan as the policies and broad development typologies have been subject to appropriate viability testing in accordance with the national guidance. In terms of setting out the levels and types of affordable housing provision required, this is dealt with under policy SP02 (Affordable Housing).</p>
Section 6. Building a strong, competitive economy	
<p>Para. 81 c) states – <i>“Planning policies should: ... seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment;</i></p>	<p>A key priority of the JLP is to enable sustainable economic growth. SP05 sets out a framework to support and encourage sustainable economic growth with ‘in principle’ support made to the protection and expansion of identified strategic sites. The Economic Strategy for Norfolk and Suffolk is a shared endeavour between businesses, education providers, local councils, the voluntary and community sector and is led by the New Anglia Local Enterprise Partnership (NALEP). This is being delivered through actions and investment in priority places and themes including the East/West corridor along the A14 from Felixstowe through Ipswich, Stowmarket and Bury St Edmunds. The Strategy is based on the NALEP 2014 Strategic Economic Plan, which informed the evidence base supporting the Joint Local Plan. The Councils’ Open for Business Economic Strategy published in February 2018 supports the implementation of the NALEP strategies including the draft Local Industrial Strategy through identifying issues to be addressed at the local level. This includes protecting the employment base and safeguarding employment land, whilst delivering a range of employment land to meet identified needs. The NALEP draft Local Industrial Strategy reflects the opportunities and needs of Norfolk and Suffolk’s growing economy and how it will respond in a fast-changing world. This includes accelerating investment on the Enterprise Zones to help drive economic growth. Two Enterprise Zones are within the ten Space to Innovate Enterprise Zones identified by NALEP in 2015. One is the Sroughton Enterprise Park in Babergh and another the Stowmarket Enterprise Park at Gateway 14 in Mid Suffolk.</p>

	<p>The Stowmarket Enterprise Park is also a designated Food Enterprise Zone. A third Enterprise Zone in the two districts, is the Orwell Food Enterprise Zone at Wherstead in Babergh.</p> <p>The Councils are also undertaking Vision for Prosperity work in Hadleigh and Sudbury in Babergh and in Eye, Needham Market and Stowmarket in Mid Suffolk District. These are the market towns within the two districts and Policy SP05 also identifies strategic sites in these locations.</p>
Section 8. Promoting healthy and safe communities	
<p>Para. 91 states – <i>“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:</i></p> <p><i>a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</i></p> <p><i>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and</i></p> <p><i>c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”</i></p>	<p>Policy LP32 – Safe, Sustainable and Active Transport, aims to maximise the uptake in sustainable and active transport in accordance with the transport hierarchy, where walking, cycling, public transport and car sharing are prioritised.</p> <p>The policy also promotes activate travel which ties in with the green infrastructure network, thereby providing additional positive effects for accessing green spaces and wildlife habitats.</p> <p>The policy also specifies that proposals for all development shall, where relevant, incorporate pedestrian and cycle routes.</p> <p>Further to the above, LP26 requires proposals to be designed for health, amenity, well-being and safety; incorporate high levels of public open space; design out crime and create an environment where people feel safe and has a strong community focus. LP30 – requires developments in excess of 1ha to provide on-site open space LP19 – includes consideration of effects on health and living conditions.</p>
<p>Para. 92 states – <i>“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:</i></p> <p><i>a) plan positively for the provision and use of shared spaces, community facilities (such as local shops,</i></p>	<p>LP30 - Developments in excess of 1 hectare will be required to provide on-site open space provision to meet identified needs/deficits, unless there is a Council preference to make improvements to existing open space within the locality in an equally or more accessible location than the proposed development. LP31 supports the provision of new community services and improving existing</p>

<p><i>meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</i></p> <p><i>b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;</i></p> <p><i>c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;</i></p> <p><i>d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and</i></p> <p><i>e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services."</i></p>	<p>facilities, and retention of these services/facilities unless compensatory provision is provided, or the service is not viable or valued by the community. For the purpose of this policy, services and facilities include: village and public halls, community centres, places of worship, cinemas, libraries, leisure centres, museums, public houses, restaurants, cafés, convenience shops, banks, building societies, and post offices. The loss of facilities will either require compensatory provision or the applicant to demonstrate that the service or facility is not viable or valued by the community, either in its current or future form.</p> <p>The JLP policies have been produced reflecting information of gaps and needs identified in the documents listed in the Sustainability Appraisal Plans and Programmes section.</p> <p>LP31 sets out that services/facilities should be retained unless compensatory provision is provided, or the service is not viable or valued by the community.</p> <p>LP31 Proposals for new community services and facilities or improving existing facilities will be supported where the proposal is well related to and meets the needs of the local community, would reduce the need to travel to other settlements, is of a proportionate scale to the settlement and would not adversely affect existing facilities.</p> <p>LP34 Health and education provision – states that the Councils will be supportive of proposals that enable dual use of new facilities within school grounds that can be used by the community.</p> <p>The Councils have taken an integrated approach to the spatial strategy. Policy SP03 (Settlement Hierarchy) has been drafted from an assessment of accessibility to facilities, services and economic opportunities. Housing (SP04) and employment (SP05) locations have been identified with regard to the assessment findings to ensure sustainable patterns of growth.</p>
<p>Para. 94 states – <i>"It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local</i></p>	<p>Through the preparation of the IDP, the Councils have taken a proactive, positive and collaborative approach, working in partnership with the County Council to assess</p>

<p><i>planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:</i></p> <p><i>a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and</i></p> <p><i>b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.”</i></p>	<p>the education needs which would derive from the planned growth of the JLP as well as the cumulative impact of existing commitments. This work with the education team of the County Council has resulted in shaping the education policies of the JLP.</p> <p>A program of new schools and school expansions is detailed in the IDP and linked to the site-specific policies of the JLP where developer contributions towards the new or expansion projects are expected.</p> <p>This work is also ongoing, through the Statement of Common Ground with Suffolk County Council, and through collaborative work with the Development Management teams of the District Councils.</p>
<p>Para. 95 states –</p> <p><i>“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:</i></p> <p><i>a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate⁴¹. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and</i></p> <p><i>b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.”</i></p>	<p>LP26 requires proposals to be designed for health, amenity, well-being and safety and to design out crime and create an environment where people feel safe and has a strong community focus.</p>
<p>Section 9. Promoting sustainable transport</p>	
<p>Para. 102 b) states –</p> <p><i>“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale,</i></p>	<p>Through the preparation of the Infrastructure Delivery Plan and the assessment of the proposed site allocations in relation to their impact on existing transport and highway infrastructure, the transport issues are being considered from the early stages of plan-making and development proposals. The proposed spatial distribution focussing growth within the market towns and core</p>

<p><i>location or density of development that can be accommodated;"</i></p>	<p>villages and along the A14 corridor enables the targeting of improvements to transport infrastructure which will benefit the wider population. Opportunities to maximise sustainable transport solutions are referred to in the IDP. Opportunities to promote walking, cycling and public transport use are also identified and pursued in the IDP.</p>
<p>Para. 104 states – <i>"Planning policies should:</i> a) <i>support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;</i> b) <i>be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;</i> c) <i>identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;</i> d) <i>provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);</i></p>	<p>Access to facilities and services is considered at an early stage of the assessment of potential site allocations, for example through the SHELAA methodology (in terms of 'Accessibility to local services and facilities' and also 'Access to wider transport networks'), and also through the B&MSDC Settlement Hierarchy Review, therefore the availability of facilities and services and the sustainable mean of accessing these facilities and services is taken into account for both urban and rural settlements.</p> <p>Through the preparation of the IDP, the Councils have taken a proactive, positive and collaborative approach, working in partnership with the County Council as Highway Authority and with Highways England to assess the transport needs which would derive from the planned growth of the JLP as well as the cumulative impact of existing commitments.</p> <p>A schedule of interventions, including highway improvements as well as projects to improve walking, cycling and the use of public transport is detailed in the IDP and linked to the site-specific policies of the JLP where developer contributions towards the projects are expected.</p> <p>This work is also ongoing, through the Statement of Common Ground with Highways England and Suffolk County Council, as well as through the Statement of Common Ground with our rail partners such as Network Rail and Greater Anglia.</p> <p>Policy LP32 (Safe, Sustainable and Active Transport) requires that all developments are to maximise the uptake in sustainable and active transport, and that development will be expected to contribute to the delivery of sustainable transport strategies for managing the cumulative impacts of growth. In practical terms the example of the provision of critical railway and highways infrastructure in Thurston, with the identified need for closing</p>

<p>e) <i>provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and</i></p> <p>f) <i>recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their</i></p>	<p>and diverting the existing pedestrian level crossing, together with the delivery of key highway infrastructure including pedestrian and cycle links is an example where, using robust evidence, critical sites and routes are identified with specific mitigation measures to enable sustainable growth.</p> <p>Policy LP32 (Safe, Sustainable and Active Transport) requires that proposals for all development shall, where relevant, incorporate:</p> <ul style="list-style-type: none"> - Pedestrian routes suitable for disabled persons and those with impaired mobility. - Cyclists facilities, including routes, secure and covered cycle parking, showers and changing facilities. - Linkages to existing pedestrian and cycle networks. <p>Further to this, the IDP refers to expected pedestrian and cycle links which are identified to enable sustainable growth and to mitigate the impact of development. The IDP provides a link between the Suffolk wide walking and cycling strategy and the opportunities arising from development for improving walking and cycling.</p> <p>Large-scale transport facilities that are currently being looked into as a result of the planned growth of the JLP and the growth from existing commitments include projects such as the Thurston Rail Station Passenger Level Crossing (closure and diversion); the package of measures identified in the Ipswich Strategic Planning Area Transport Mitigation Strategy; there are also important pedestrian and cycle links being developed in relation to proposed growth, such as the link between Elmswell and Woolpit. There are also other rail improvement projects such as at Needham Station, and other smaller scale projects that are listed in the transport section of the IDP.</p> <p>The IDP summarises the key elements of the projects, their estimated costs and expected funding mechanisms, as well as the lead provider.</p> <p>The July 2019 version of the IDP did not include General Aviation Airfields, however, in line with this NPPF requirement, the IDP (which is an iterative document) has been amended accordingly to take account of the</p>
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<i>economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy."</i>	existing airfields within our Districts and their role. This is to recognise the importance of maintaining a national network of general airfields, and their need to adapt and change over time and also recognise the emergency service needs that these airfields can provide.
Para. 107 states – <i>"Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use."</i>	The July 2019 version of the IDP did not include Overnight Lorry Parking Facilities, however, in line with this NPPF requirement, the IDP has been amended accordingly to take account of the existing provision and any identified needs.
Section 10. Supporting high quality communications	
Para. 112 states – <i>"Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections"</i>	The Digital Connectivity section of the Infrastructure Delivery Plan refers to mobile, land based and broadband communications. Within the Joint Local Plan, Digital Connectivity and telecommunications in general is referred in terms of a driver for economic growth and to facilitate home working, it is further strengthened in Policy SP08 (Infrastructure Provision), as strategic infrastructure, to reflect the increased importance of this infrastructure now and for the future.
Section 12. Achieving appropriate densities	
Para. 122 c) states - <i>"Planning policies and decisions should support development that makes efficient use of land, taking into account... the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use"</i>	Infrastructure availability and capacity is evidenced by the Councils Infrastructure Delivery Plan. LP26 – all new development must be designed for health, amenity, well-being and safety; prioritise movement by foot, bicycle and public transport; design out crime and create safe environments; LP30 – Developments in excess of 1 hectare will be required to provide on-site open space; LP32 – Safe, Sustainable and Active Transport – supports walking and cycling including enhancements to Public Rights of Way network; Relevant site allocation policies require Public Rights of Way to be retained and/or enhanced.
Section 14. Meeting the challenge of climate change, flooding and coastal change	
Para. 149 states – <i>"Policies should support appropriate measures to ensure the future resilience of</i>	SP10 requires the need to take into account long term implications from climate change. LP12 – Employment proposals must demonstrate high-quality sustainable design.

<p><i>communities and infrastructure to climate change impacts”</i></p>	<p>LP17 – policy aims to ensure all development are environmentally sustainable and seek to prevent and mitigate against environmental impacts and climate change.</p> <p>LP18 narrative identifies the importance of a Green Infrastructure to ensure an improved and healthy environment is available for present and future communities. Improvements can include reducing vulnerability and increase resilience to extreme weather events and flooding through measures such as SuDs.</p> <p>LP21 – supports proposals to enhance the environmental performance of heritage assets, by having regard to Historic England’s Advice and Guidance.</p> <p>LP25 requires improvements to water efficiency to achieve higher efficiency standards in response to both districts identified as areas experiencing “serious” water stress.</p> <p>LP25 also requires proposals to demonstrate risks associated with future climate change have been planned for as part of layout of scheme and design, to ensure longer – term resilience.</p> <p>LP26 Maintains good design is a key aspect of sustainable development with potential to maintain and enhance existing environments and can also benefit the health of residents and community safety.</p> <p>LP28 requires development to conform with the principle of Holistic Water Management including water efficiency and re-use measures.</p> <p>LP31 supports new services and facilities which are well related to and meets the needs of the local community and would reduce the need to travel to other settlements.</p> <p>LP32 aims to ensure accessibility for all and to deliver sustainable development. All development required to maximise the uptake in sustainable and active transport using a transport hierarchy. Will also be expected to contribute to the delivery of sustainable transport strategies for managing cumulative growth.</p> <p>LP33 states that where cumulative impact of schemes on strategic infrastructure could restrict development, a coordinated approach will be used to pool resources to address requirements if appropriate.</p>
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EVIDENCE BASE

The National Planning Policy Framework (NPPF) requires Local Authorities to develop policies based on up to date evidence. The evidence base comprises documents that have helped inform past and current stages of the Joint Local Plan policy development; emerging evidence will help inform future development of policies for the Joint Local Plan.

The key pieces of evidence base relevant to infrastructure are:

National

- National Planning Policy Framework (NPPF)
- National Planning Practice Guidance (NPPG)
- Department for Education, Securing developer contributions for education (November 2019)

Regional

- NHS England, Five Year Forward View (October 2014)
- NHS England, Next Steps on the Five Year Forward View (March 2017)
- Lord Carter Review – Operational Productivity and Performance in English NHS Acute Hospitals (January 2016)
- Naylor Review – NHS Property and Estates: Why the estate matters for patients (March 2017)
- East of England Ambulance Service NHS Trust (EEAST) - Corporate Strategy (2020-2025)
- The EAST Integrated Transport Strategy for Norfolk and Suffolk (May 2018)
- Update of the Haven Gateway Green Infrastructure Strategy for the Ipswich Policy Area; Babergh District Council, Ipswich Borough Council, Mid-Suffolk District Council and Suffolk Coastal District Council; August 2015

Local

- Babergh and Mid Suffolk Infrastructure Delivery Plan (September 2020)
- Babergh and Mid Suffolk Infrastructure Delivery Plan (July 2019)
- Babergh Infrastructure Delivery Plan (2013)
- Mid Suffolk Infrastructure Delivery Plan (2014)
- List of infrastructure forming part of the Stowmarket Area Action Plan (SAAP – 2013)
- Babergh District Council Infrastructure Funding Statement (Infrastructure List) (IFS) (December 2020)
- Mid Suffolk District Council Infrastructure Funding Statement (Infrastructure List) (IFS) (December 2020)
- Babergh and Mid Suffolk - Plan Viability & CIL Review Study Regulation 19 Stage (October 2020)
- The Community Infrastructure Levy Expenditure Framework, for Babergh and Mid Suffolk District Councils (April 2020)
- Babergh District Council CIL Position Statement (September 2019) (Replaced by the IFS mentioned above)
- Mid Suffolk District Council CIL Position Statement (September 2019) (Replaced by the IFS mentioned above)
- Suffolk Local Transport Plan 2011 – 2031
- Suffolk County Council Waste and Minerals Plan (July 2020)
- Babergh Local Transport Study Babergh LDF – Transport Impacts (Jan 2010)

- Sudbury Transport Study (Nov 2018)
- Stowmarket Transport Strategy Draft (2010)
- Babergh and Mid Suffolk Open Space Assessment (May 2019)
- Babergh and Mid Suffolk Strategic Flood Risk Assessment (SFRA) Level 1 (August 2020)
- Babergh and Mid Suffolk Strategic Flood Risk Assessment (SFRA) Level 2 (October 2020)
- Babergh and Mid Suffolk Water Cycle Study (WCS) (October 2020)
- Babergh and Mid Suffolk Water Cycle Study (WCS) addendum (October 2020)
- Babergh and Mid Suffolk Leisure, Sport and Physical Activity Strategy 2017-2030, (May 2019)
- Babergh and Mid Suffolk Leisure Facilities Strategy 2017-2030 (June 2017)

Transport Modelling (undertaken for the Joint Local Plan)

- Suffolk Local Plan Strategic Modelling – Model Run 9 Sensitivity Test – Technical Note (November 2020)
- Suffolk Local Plan Modelling - Methodology Report and Appendices (October 2020)
- Suffolk Local Plan Modelling - Forecasting Report and Appendices (October 2020)
- Ipswich Strategic Planning Area Local Plan Modelling - Methodology Report (January 2020)
- Ipswich Strategic Planning Area Local Plan Modelling - Methodology Report, Appendices (January 2020)
- Ipswich Strategic Planning Area Local Plan Modelling - Forecasting Report - Forecasts with demand adjustments (January 2020)
- Ipswich Strategic Planning Area Local Plan Modelling - Forecasting Report, Appendices (January 2020)
- Ipswich Strategic Planning Area Local Plan Modelling, Methodology Report (August 2019)
- Ipswich Strategic Planning Area Local Plan Modelling, Forecasting Report – Updated 2026 and 2036 forecasts with demand adjustments (August 2019)
- Ipswich Strategic Planning Area Local Plan Modelling, Strategic Road Network Technical Note (August 2019)
- Local Plan Modelling for Babergh & Mid Suffolk, Ipswich and Suffolk Coastal, Methodology Report (January 2019)
- Local Plan Modelling for Babergh & Mid Suffolk, Ipswich and Suffolk Coastal, Forecasting Report – Volume 2: Suffolk Coastal and Ipswich Preferred Option (January 2019)
- Local Plan Modelling for Babergh & Mid Suffolk, Ipswich and Suffolk Coastal, Methodology Report (August 2018)
- Local Plan Modelling for Babergh & Mid Suffolk, Ipswich and Suffolk Coastal, Forecasting Report – Volume 1: Suffolk Coastal and Ipswich (August 2018)

Statements of Common Ground

- Babergh and Mid Suffolk and Suffolk County Council – Interim (October 2020); Final (March 2021)
- Babergh and Mid Suffolk, Highways England and Suffolk County Council – Interim (October 2020); Final (March 2021)
- Babergh and Mid Suffolk, Network Rail, Greater Anglia and Suffolk County Council – Interim (October 2020); Final (March 2021)
- Babergh and Mid Suffolk and NHS Healthcare Authorities – Interim (October 2020); Final (March 2021)
- Babergh and Mid Suffolk and Essex and Suffolk Water - Draft (October 2020); Final (March 2021)

- Babergh and Mid Suffolk and West Suffolk – Interim working draft (November 2020); Final (March 2021)
- Statement with Ipswich Strategic Planning Area (ISPA) authorities – version 6 (June 2020); Version 7 (March 2021)

APPRAISAL OF THE LOCAL CONTEXT AND POLICY CONSIDERATIONS FROM MADE NEIGHBOURHOOD PLANS

The following section brings together relevant legislation and key evidence base findings where appropriate. It highlights the main areas relevant to formulating a Joint Local Plan policy approach for the Infrastructure in our districts and indicates how this has informed the choices made during the development of the policies.

Local Context

The provision of infrastructure is fundamental to maintaining the quality of life, the prosperity and environmental credentials of the area. It is essential that any future growth and development is supported by infrastructure to meet the needs of the population, businesses and the wider community. In 2019, the Infrastructure Delivery Plan (IDP) has been undertaken to inform the emerging Babergh and Mid Suffolk Joint Local Plan (JLP). Sitting alongside the Joint Local Plan, the IDP provides specifics on the main items of infrastructure, when they are likely to be provided, by which provider, and how they would be funded. The IDP of July 2019 was published with other evidence documents to support the JLP for the Regulation 18, and a subsequent update of the IDP (September 2020) was published for the Regulation 19 Pre-Submission consultation of the JLP.

Neighbourhood Plans

Neighbourhood planning enables Neighbourhood Forums and Parish Councils to develop a vision and planning policies for a designated neighbourhood area. Those 'Neighbourhood Development Plans' (NDP) which are successfully adopted will form part of the statutory development plan for the area that they cover. Where a NDP is adopted or emerging before an up-to-date Local Plan is in place, the local planning authority should take it into account when preparing Local Plan policies.

There are a number of made Neighbourhood Plans in the Districts, as per listed below: -

Within Babergh: -

The Aldham NDP was made in January 2020. It does not contain any specific policy relating to infrastructure, although infrastructure provision is referred in general terms within Policy ALD1 (Spatial Strategy) and in reference to the NPPF. There is not considered to be a conflict between the JLP infrastructure policies and the Aldham NDP.

The East Bergholt NDP was made in September 2016. Policy EB11 looks to safeguard an existing coach and car park. Policy EB12 requires all new development to provide adequate parking. Policies EB13 and EB14 requires new development to have safe green connectivity networks. Policy EB16 seeks to retain community facilities. There is not considered to be a conflict between the JLP infrastructure policies and EB11, EB12, EB13, EB14 and EB16, or any other policies of the East Bergholt NDP.

The Elmsett NDP was made in December 2019. Policy EMST13 on Communications Technology relates to proposals from mobile phone network operators. Policy EMST15 relates to Community Facilities and Services, and Policy EMST16 relates to Open Space, Sport and Recreation Facilities. EMST3 is a site allocation with infrastructure requirements such as improvements to highway, footways, public open space, play area and enhancement to the Public Right of Way. EMTT8 identifies Local Green Spaces where development will only be permitted in very special circumstances. There is not considered to be a conflict between the JLP infrastructure policies and the Elmsett NDP.

The Lavenham NDP was made in September 2016. Policy C1 supports development that will enhance the viability of any community facility and/or provides recreation and community facilities. Policy C3 seeks to support development that provides opportunities for walking, cycling and horse-riding networks. Policy C4 seeks to support development that provides public allotments. Policy C5 seeks to retain health care provision and support provision for institutional care that meets the needs of the older generation. Policy C6 seeks to ensure the relocation of a primary school is agreed before supporting any proposal for change of use of existing primary school site to local retirement and care home. Policy C7 requires proposals for expansion of electronic communication networks and high-speed broadband to be sited and designed for minimum impact on character and views of village. Policy C8 requires new residential development to have incorporated ducting capable for fibre to enable Superfast Broadband. There is not considered to be a conflict between the JLP infrastructure policies and the Lavenham NDP.

The Lawshall NDP was made in October 2017. Policy LAW14 requires proposals to provide and enhance community facilities and services to meet the needs of Lawshall and contribute to the quality of village life. Policy LAW15 requires development to accommodate additional children at All Saints Primary School to provide appropriate off-street parking. There is not considered to be a conflict between the JLP infrastructure policies, LAW14 and LAW15, or any other policies of the Lawshall NDP.

Within Mid Suffolk: -

The Botesdale & Rickingham NDP was made in January 2020. The specific site allocation policies (B&R 3, B&R 4, B&R 5, B&R 6 and B&R 7) refer to specific infrastructure needs such as footways, cycleways and links the Public Rights of Way network, highway improvements, public open space, children play areas, and community woodlands. Policy B&R 12 seeks the retention and protection of Local Green Spaces. B&R 19 seeks to protect existing services and facilities. B&R 20 deals with the provision, enhancement and/or expansion of open space, sport and recreation facilities. B&R 21 deals with Public Rights of Ways. There is not considered to be a conflict between the JLP infrastructure policies and the policies listed above.

The Debenham NDP was made in March 2019. Policy DEB7 seeks to ensure proposals will not reduce off street parking or front garden space. Policy DEB8 requires development to ensure there will not be an unacceptable rise in highway dangers Debenham's Infrastructure. Policy DEB9 seeks to protect existing footpaths and bridleways and support opportunities to enhance existing and provide new networks where appropriate. Policy DEB12 requires all new development to incorporate a suitable infrastructure to enable high speed broadband. There is not considered to be a conflict between the JLP infrastructure policies and policy DEB7, DEB8, DEB9 and DEB12 or any other policies of the Debenham NDP.

The Drinkstone NDP was through examination stage at the time of preparing the Joint Local Plan and awaiting Local Referendum on 6th May 2021. DRN8 identifies Local Green Spaces where development will only be permitted in very special circumstances. In terms of infrastructure and services, four Community Actions are laid out to deal with superfast

broadband provision (Community Action 4), highways safety (Community Action 5), flood issues (Community Action 6), new bridleways and permissive footpaths (Community Action 7). There is not considered to be a conflict between the JLP infrastructure policies and the Drinkstone NDP.

The Eye NDP was through examination stage at the time of preparing the Joint Local Plan and awaiting Local Referendum on 6th May 2021. The specific site allocation policies (EYE 4, EYE 5, EYE 6, EYE 7, EYE 8) refer to specific infrastructure requirements such as Electric Vehicle Charging, provision for allotments, public open space and Traffic Management Plans to be submitted. EYE 9 relates to the redevelopment of the chicken factory and requires links to the pedestrian and cycleway network and that a transport assessment and flood risk assessment is prepared. Policy EYE 10 refers to land proposed for public car parking at the rettory. EYE 11 deals with cycle parking in public car parks to ensure that cycle parking should be provided within new public car parks to meet at least the standards set out in the County Council's Parking Guidance. EYE 12 proposes land for a crematorium car parking spaces to serve the crematorium and the cemetery and provide pedestrian access into the cemetery. EYE 13 provides Land to the west of Hartismere High School as an allocation as a reserve site for educational purposes. EYE 14 proposes a land allocation for a Sports Hall and related uses at Hartismere High School. EYE 16 refers to development within the settlement boundary and ensures that provision is made to encourage cycling, with cycle parking in accordance with the County Guidance. EYE 18 identifies Local Green Spaces where development will only be permitted in very special circumstances. EYE 22 deals with Public Rights of Way and proposes a new footpath and cycleway to encourage walking and cycling to the high school as well as to the employment and heritage sites. EYE 23 also encourages walking and cycling, more specifically to the town centre and primary school, and EYE 24 aims to protect, enhance and connect the Public Rights of Way of the area surrounding the countryside and villages. EYE 25 and 26 deal with electric vehicle charging in new developments and in public car parking spaces. Eye 28 specifically deals with infrastructure and states that *'All development in Eye will be expected to contribute to the infrastructure requirements for the Town in accordance with Mid Suffolk District Council's most up to date CIL spending guidance and the Eye Town Infrastructure Plan.'* There is not considered to be a conflict between the JLP infrastructure policies and the Eye NDP.

The Fressingfield NDP was made in March 2020. Policy FRES 3 deals with infrastructure in general and states that *'New development will only be permitted if it can be demonstrated that sufficient supporting infrastructure (physical, medical, educational, green and digital) is available to meet the needs of that development. Where an infrastructure deficit currently exists, new development should not exacerbate that deficit. Where the need for new infrastructure is identified to meet the needs of that development, developments should provide or support the delivery of it in order to enhance the quality of life for the community.'* FRES 4 deals with the protection of community facilities and explains the case where changes of uses would be supported. FRES 5 supports the creation of a Fressingfield Hub. FRES 7 identifies Local Green Spaces where development will only be permitted in very special circumstances. FRES 12 deals with energy efficiency, low carbon technology and renewable energy. FRES 15 Transport and Highway Safety seeks to improve levels of walking and cycling and seeks opportunities to provide safe and attractive pedestrian and cycle links that connect to existing networks. There is not considered to be a conflict between the JLP infrastructure policies and the Fressingfield NDP.

The Haughley NPD was made in October 2019. Policy HAU3, HAU4 and HAU5 are specific site allocations for residential developments requiring outdoor green space, footway links, and connections to the Public Rights of Way network and adequate car parking in accordance with the County Guidance. HAU8 deals with Broadband to ensure that new development (dwellings or businesses) have suitable infrastructure to enable high speed broadband to be connected. HAU11 deals with the protection of local community facilities, whilst HAU12 deals

with the provision of new retail and community facilities. HAU13 identifies Local Green Spaces where development will only be permitted in very special circumstances. HAU15 deals with the protection and improvements of the Rights of Way and Access. There is not considered to be a conflict between the JLP infrastructure policies and the Haughley NDP.

The Mendlesham NDP was made in March 2017. Policy MP7 requires all new development to incorporate a suitable infrastructure to enable high speed broadband. Policy MP11 requires all new development to provide linkage to the network of existing paths and bridleways in and around Mendlesham. There is not considered to be a conflict between the JLP infrastructure policies, MP7 and MP11, or any other policies of the Mendlesham NDP.

The Stowupland NDP was made in June 2019. It does not contain an infrastructure policy. There is not considered to be in conflict between the JLP infrastructure policies or any policies of the Stowupland NDP.

The Stradbroke NDP was made in March 2019. Policy STRAD4 requires development proposals to demonstrate they will not have a negative impact upon existing drainage and electricity networks. Policy STRAD6 supports the expansion of education and health facilities in order to meet the needs of Stradbroke. Policy STRAD7 seeks to support proposals which retain, enhance and/or provide community infrastructure. Policy STRAD8 strongly supports proposals that will improve the flow of traffic and pedestrian safety. Policy STRAD9 requires development that will generate an increased need for parking to provide suitable parking. There is not considered to be a conflict between the JLP infrastructure policies and STRAD4, STRAD6, STRAD7, STRAD8 and STRAD9, or any other policies of the Stradbroke NDP.

The Thurston NDP was made in October 2019. Policy 5 deals with community facilities. Policy 6 deals with the enhancement of Key Movement Routes and the protection of the Public Rights of Way network. Policy 7 (Highway capacity and key road junction), states that where a Transport Assessment or Transport Statement is required, this should address the transport impacts on road junctions, particularly including the following junctions:

a. Fishwick Corner; b. Pokeridge Corner; c. Junction of Beyton Road and New Road; d. The railway bridge/junction of Barton Road and Station Hill. Policy 8 deals with car parking provision to ensure adequate provision in accordance with the County Guidance. In terms of the new primary school in Thurston, the policy specifies that it must be designed to support appropriate levels of off-road parking and drop-off facilities for cars, buses and coaches. Policy 10 identifies Local Green Spaces where development will only be permitted in very special circumstances. There is not considered to be conflict between the JLP infrastructure policies and the Thurston NDP.

The Wilby NDP was through examination stage at the time of preparing the Joint Local Plan and awaiting Local Referendum on 6th May 2021. WIL3 identifies Local Green Spaces. Site specific infrastructure needs are referred under policy WIL6 (site allocation for 5 dwellings). There is not considered to be a conflict between the JLP infrastructure policies and the Wilby NDP.

OVERVIEW OF HOW THE CONSULTATION STAGES HAVE SHAPED THE INFRASTRUCTURE POLICIES

As part of developing the Joint Local Plan, public consultations have taken place during the following stages:

- Regulation 18 Issues and Options (August 2017) – which identified a range of issues and potential options for the Babergh and Mid Suffolk Joint Local Plan;

- Regulation 18 Preferred Options consultation (July 2019) – which set out the preferred policies and site allocations for the Joint Local Plan.
- Regulation 19 Pre-Submission consultation (12th November to 24th December 2020)

Comments received as part of the consultation stages have been taken into account in the preparation of the Joint Local Plan.

The Issues and Options Draft Joint Local Plan (August 2017) included infrastructure considerations. The representations made during the consultation of August 2017 largely covered the following points:

- Need to strengthen policies to ensure infrastructure is prioritised and will be provided
- Infrastructure must ensure it meets local needs
- Infrastructure requirements should be embedded into site-specific policies where appropriate
- More clarity on how strategic plan will accommodate windfall developments which constitute a significant proportion of rural development sites

The Regulation 18 Preferred Options consultation (July 2019) included specific infrastructure policies, these were at the time:

- Infrastructure Provision (Policy SP08)
- Services and Facilities within the Community (Policy LP29)
- Safe, Sustainable and Active Transport (Policy LP30)
- Managing Infrastructure Provision (Policy LP31)
- Health and Education Provision (Policy LP32)
- Developer Contributions and Planning Obligations (Policy LP33)

The key changes were:

Relating to the policy on Infrastructure Provision (SP08):

The word 'Strategic' was added in the policy title.

In light of representations made by key infrastructure providers, the policy text was also amended to refer to -

- Transportation improvements (including modal shift) to the strategic infrastructure along the A12 and A14 corridors, and the delivery of the Ipswich Strategic Planning Area Transport Mitigation Strategy to mitigate cumulative transport and air quality impacts.
- A district wide education expansion programme to match projected population growth.
- Protected Habitats Mitigation Zones
- Upgrade from 2025 to the Hartismere water supply infrastructure network.
- Improvements to digital technology infrastructure

Clarifications were also made within the policy wording to include that:

'All development will also need to make provision for appropriate contributions towards community infrastructure, where the relevant locality to the development proposal has been identified through the Infrastructure Delivery Plan.

The required infrastructure will be provided through a combination of Community Infrastructure Levy (CIL), Planning Obligations, Developer Contributions and where appropriate funding assistance from the Councils / other provider organisations.'

Relating to the policy on Safe, Sustainable and Active Transport (LP30):

The recommended additions to the explanatory text of the policy were noted and added for the Regulation 19 Pre-Submission document. The recommended amendments to the policy wording were also made as these provide clarity and strength to the policy. The main changes

made were in relation to Travel Plans, and the standards for requiring Transport Statements of Transport Assessments. The additional text also provided a link to the ISPA Transport Mitigations Strategy, which evidences the cumulative impacts of growth on the highway and the mitigation measures needed to address this. Additional text was also added to provide clarity relating to 'home to school transport contributions where necessary' as these are already being secured through the planning process, where relevant to the development.

Relating to the policy on Managing Infrastructure Provision (LP31):

Amendments to the policy wording and supporting text were made for the Regulation 19 Pre-Submission document.

Relating to the policy on Health and Education Provision (LP32):

Additional wording in the explanatory text of the policy was added particularly in relation to Early Years, Primary, Secondary, Post 16 education and SEND (Special Education Needs and Disability) provision. Additional text within the policy wording included 'Development adjacent to existing schools should not compromise the ability of the school to expand to an appropriate size in the future.' References to the paragraph 104 of the NPPF were also added, in reference to 'shorter journeys to school' in order *to minimise the number and length of journeys needed for education as required by the NPPF*.

The Statement of Common Grounds (SoCGs) listed under the Evidence Base, on page 13 reflect the collaborative approach needed for the delivery of infrastructure. The SoCGs have been prepared in partnership with key infrastructure providers. These also provide the details of the representations made by the infrastructure providers with whom the District Councils have entered in agreement. The SoCGs show the working progress from representations made, to how these have been taken into account as the JLP is progressing to Submission, and where further or ongoing collaborative work is needed.

As a result of comments received, the infrastructure policies have been amended to take account of the issues raised where appropriate. The Regulation 19 Pre-Submission document includes the following policies:

Strategic Policies

- Policy SP08 – Strategic Infrastructure Provision
- Policy SP09 – Enhancement and Management of the Environment
-

Local Policies – Healthy Communities & Infrastructure

- Policy LP30 – Designated Open Spaces
- Policy LP31 – Services and Facilities Within the Community
- Policy LP32 – Safe, Sustainable and Active Transport
- Policy LP33 – Managing Infrastructure Provision
- Policy LP34 – Health and Education Provision
- Policy LP35 – Developer Contributions and Planning Obligations

As well as through the site-specific policies.

Through the Regulation 19 Pre-Submission consultation which closed on the 24th December 2020. The main issues raised as objections and referring to infrastructure were in relation to:

A) Suffolk Constabulary & police facilities

The approach taken to address matters raised are:

A) In terms of Suffolk Constabulary and police facilities

Representation made on behalf of Suffolk Constabulary related to 2 specific requests:

1. Inclusion of necessary targeted references to Suffolk Constabulary & police facilities within the text/policy/glossary of the Reg 19 Plan

It was explained to the respondent that this request would not be addressed through changes to the Joint Local Plan, as the text in the Joint Local Plan is intentionally flexible and policies refer to the IDP for the expected infrastructure requirements. The IDP is reviewed annually to ensure the infrastructure needs can be updated and can reflect the evolving picture of development being planned, committed and delivered.

The site specific policies of the Joint Local Plan list the infrastructure needs assessed that are directly related to the specific sites, such as the direct contributions required towards education, health, transport and waste, however for all other infrastructure needs that are also required, these are dealt with through the Part 1 and 2 Infrastructure Delivery Policies (SP08, LP33 and LP35) as supported by the IDP.

The relevant policies are summarised below:

- Policy SP08 - Strategic Infrastructure Provision - 2) *All development will also need to make provision for appropriate contributions towards community infrastructure, where the relevant locality to the development proposal has been identified through the Infrastructure Delivery Plan.*
- Policy LP33 – Managing Infrastructure Provision - 1. *When determining planning applications, adequate regard must be given to the Council's latest Infrastructure Delivery Plan and consultation responses received from infrastructure providers.*
- Policy LP35 – Developer Contributions and Planning Obligations
The required infrastructure will be provided through a combination of Community Infrastructure Levy (CIL), Planning Obligations, Developer Contributions.
When making planning decisions, regard will be given to the Infrastructure Delivery Plan, the consultation responses received from infrastructure providers and the associated Plan evidence base. Applicants are required to mitigate the additional impacts their development will place on infrastructure through Planning Obligations and Community Infrastructure Levy (CIL) contributions.

It would not be appropriate for the JLP to specify every type of infrastructure nor to single out only a limited number of infrastructure types. Across the district areas requirements and priorities are likely to change over the lifetime of the Plan. The JLP focusses on the strategic statutory requirements and provides the policy framework to support the delivery of all infrastructure as defined through the IDP. This means that, unlike the JLP, there is the ability for the IDP to be updated annually reflecting the changing needs and demands of communities on infrastructure and the funding to be prioritised accordingly through CIL and monitored through the Infrastructure Funding Statement.

The IDP of September 2020 has taken consideration of the representations made on behalf of Suffolk Constabulary, please see web links below to the September 2020 IDP:

Babergh: <https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Infrastructure2020/BMSDC-IDP-Sept-2020.pdf>

Mid Suffolk: <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Infrastructure2020/BMSDC-IDP-Sept-2020.pdf>

Section 6, from page 95, covers the Police requirements. Further to this the Appendix of the IDP, page 197, refers the 5 SNTs within our districts are listed with individual IDP project numbers. Such as for Eye, Hadleigh, Ipswich, Stowmarket (where the current CIL bid for the new Stowmarket Emergency Hub is also referred) and Sudbury. These 5 IDP projects are then also listed within our new Infrastructure Funding Statement, as an indication of projects potentially needing developer contributions in relation to the population growth expected from the growth proposed in the JLP.

2. Inclusion of the Sec 106 developer funded budget requested within the IDP for officer (including Police Community Support Officer) recruitment/training/equipment costs to manage planned housing growth to 2036 across the 5 x SNT areas @ £2,881,691

The IDP (Sept 2020) Table 28, page 96 (shown below) last row refers to 'Funding for additional staff resources, incorporating Police Community Support Officers (during the construction & occupation phases of residential development), police officers, back office staff, recruitment, training & equipment' as a Revenue Cost, which are generally funded through other means rather than s106.

Table 28: Police facilities needs arising from growth of the emerging JLP

Emerging JLP site allocation number of dwellings	Infrastructure / Revenue Cost	Funding Mechanism	Average cost per dwelling
Additional or enhanced police station (Safer Neighbourhood Team) floor space & facilities, including fit out (excluding refurbishment or maintenance);	Infrastructure	CIL	£95
Custody facilities	Infrastructure	CIL	Included in above station cost
Mobile police stations	Infrastructure	CIL	Specific to area need/not per dwelling cost
Communications, including ICT	Infrastructure	CIL	Specific to area need/not per dwelling cost
Automatic Number Plate Recognition (ANPR) Technology and Traffic Mitigation (Speed Cameras)	Infrastructure	CIL	Specific to area need/not per dwelling cost
Police vehicles	Revenue Cost	S106	£122
Funding for additional staff resources, incorporating Police Community Support Officers (during the construction & occupation phases of residential development), police officers, back office staff, recruitment, training & equipment	Revenue Cost	Revenue funding generally other than s106.	

Consideration was given to the representations made on behalf of Suffolk Constabulary and the infrastructure needs to mitigate the impact of the planned growth on policing facilities and services is now included in the IDP (from the IDP of September 2020), albeit excluding the revenue costs as s106, for the reasons explained above.

It was also explained to the respondent that viability testing has taken place in respect of whole plan viability as well as with regard to revised CIL rate charging which represents just one of the different ways in which infrastructure delivery occurs. The viability testing of the plan has been inclusive of infrastructure requirements including the Infrastructure Delivery Plan, the requirements of all emerging planning policies together with site allocation requirements. In formulating the Infrastructure Delivery Plan which is supporting evidence for the Joint Local Plan there has been engagement with infrastructure providers and all requested infrastructure requirements have been reviewed to determine whether they are reasonable. Both Councils have also undertaken this work in the light of the different ways that infrastructure delivery is achieved including through direct provision or by securing developer contributions. In respect of s106 Obligations the three legal tests in the CIL Regulations relating to such developer contributions are set out below; s106 obligation must meet 3 legal tests:

- (i) necessary to make the development acceptable in planning terms;
- (ii) directly related to the development;
- (iii) fairly and reasonably related in scale and kind to the development.

The policies of the emerging Joint Local Plan and the Infrastructure Delivery Plan are clear, consistent and justified. The IDP has used the evidence provided by Suffolk Constabulary as far as is reasonable and therefore the two requested changes referred above on behalf of Suffolk Constabulary are not accommodated.

It was however noted from the response, that the Planning Inspector of the East Suffolk Plan examination included the funding of staff resources through developer contributions, and although Suffolk Constabulary would like to see a consistent approach on this matter across Suffolk, the position taken by East Suffolk and the Inspector is not one which Babergh and Mid Suffolk wish to endorse particularly as this approach could be mirrored by other Infrastructure providers wishing a proportion of their staffing costs to be borne by developers. Revenue support provided through development contributions is generally a 'one off' and time limited to cover a gap in funding.

CONCLUSION ON THE POLICY APPROACH

This topic paper outlines and explains how the infrastructure policies of the draft Joint Local Plan have evolved from the Council's evidence base, national planning policy and guidance and consultation comments received from the Regulation 18 and Regulation 19 consultations. The document is intended to provide background information and does not in itself contain the policies or site allocations.

By considering and reflecting national policy and guidance, the local context and public opinion, the policies which relate to infrastructure provide a strong position for development management, which will help direct development towards the most sustainable locations within the districts. The policies will enable the Councils to accommodate its assessed housing needs without negatively impacting upon infrastructure.