

Babergh and Mid Suffolk Joint Local Plan

Statement of Common Ground

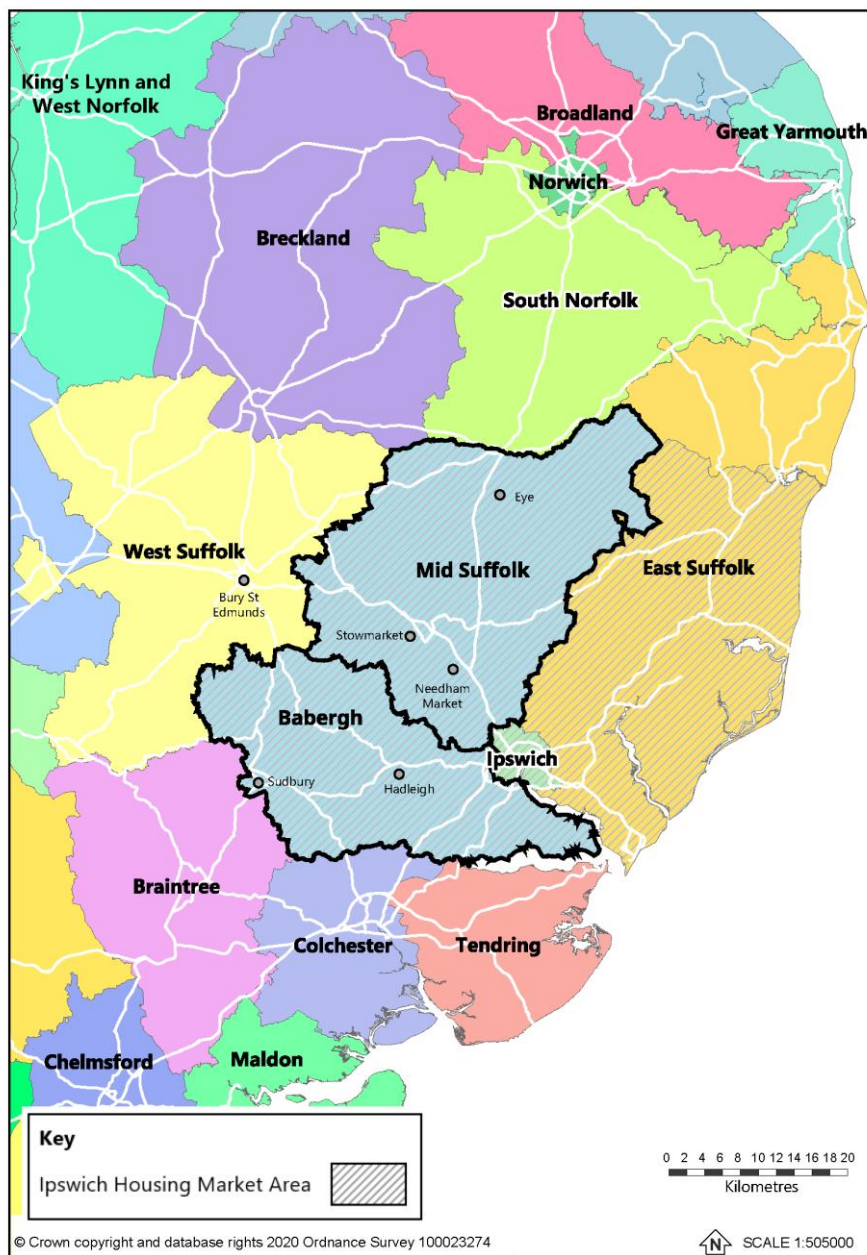
Between

Babergh and Mid Suffolk District Councils and West Suffolk Council

March 2021

1. Areas covered by the Statement of Common Ground

The Statement of Common Ground relates to the area covered by the local planning authorities of Babergh District Council, Mid Suffolk District Council and West Suffolk Council.



2. Authorities covered by the Statement of Common Ground

The signatories to this Statement of Common Ground are:

- Babergh District Council,
- Mid Suffolk District Council, and
- West Suffolk Council.

Ongoing engagement is being undertaken with Suffolk County Council, the West Suffolk Clinical Commissioning Group (CCG) and the West Suffolk NHS Foundation Trust and this Statement of Common Ground (SoCG) details the current position. An interim SoCG was published alongside the Joint Local Plan (JLP) Pre-Submission (Reg 19) Document (November 2020).

3. Purpose of Statement of Common Ground

Local planning authorities have a statutory duty to co-operate with specified bodies in relation to strategic planning matters.

The National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance require local authorities to produce a Statement of Common Ground as a written record on progress made for strategic planning matters across local authority boundaries and for this to be kept under review.

Prior to the publication of the JLP Pre-Submission (Reg 19) Document, West Suffolk Council raised concerns to planning applications being determined in Thurston and to a lesser extent in Elmswell and Woolpit and the cumulative impact of residential development on public services, especially health, highways and leisure.

West Suffolk Council and Suffolk County Council have shared GIS information with Babergh and Mid Suffolk District Councils to support the preparation of the Sustainability Appraisal. West Suffolk Council have also provided information to support the preparation of a Babergh and Mid Suffolk Water Cycle Study.

Collaborative work has taken place in partnership between Babergh and Mid Suffolk District Councils and West Suffolk Council together with third parties including Suffolk County Council, Highways England and the Clinical Commissioning Groups to better understand the cross-boundary impacts of growth on our respective districts. This work particularly relates to highways and transport matters and also the impact on health facilities. Two specific workstreams necessitate ongoing collaboration, these are:

- The development and implementation of a Schedule of Interventions for transport and highway matters.
- The cumulative impact of growth along the A14 corridor which impacts health facilities.

4. Strategic matters being addressed

The Joint Local Plan sets out in policy SP08 the approach to strategic infrastructure. Section 16 contains local policies for healthy communities and infrastructure. Detailed site-specific infrastructure requirements are set out in the Place section of the Joint Local Plan. The Infrastructure Delivery Plan (IDP) lists the infrastructure needs assessed as a result of the planned and committed growth as set out in the Joint Local Plan and will be reviewed annually.

The following cross boundary infrastructure issues were previously identified within the Interim position of the Statement of Common Ground (November 2020):

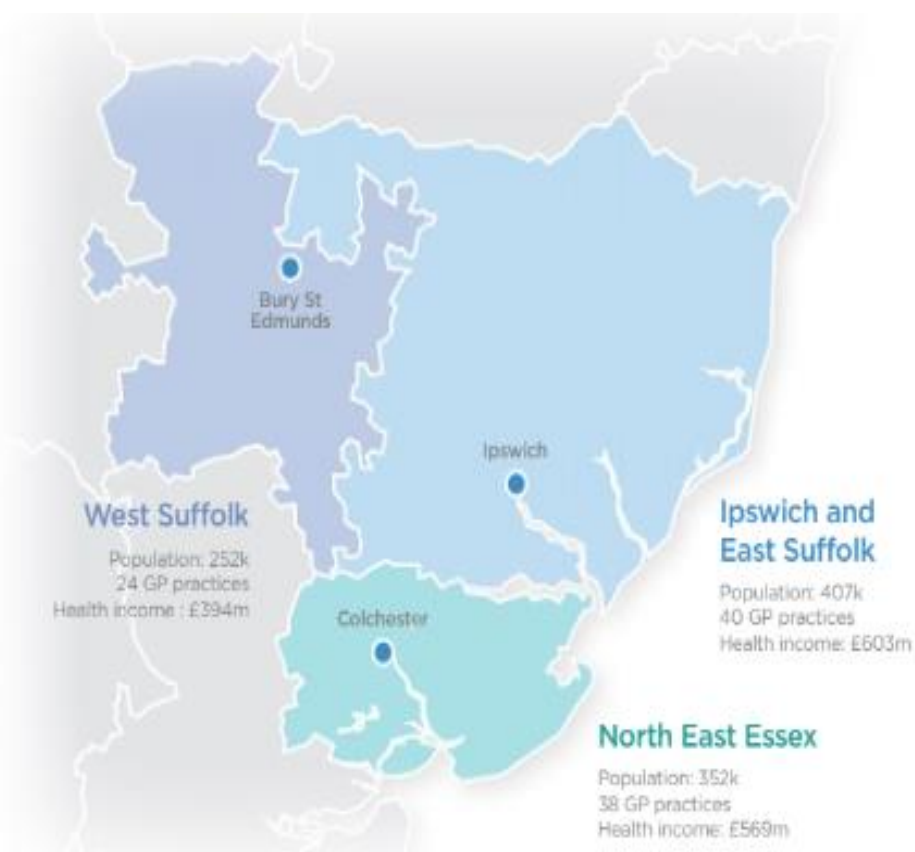
- Health
- Transport
- Sport and Leisure

Ongoing collaboration and progress with each matter is detailed below.

Health

In respect of health providers, they will look at provision that meets their service priorities. The West Suffolk Clinical Commissioning Group (CCG) covers the cross-boundary area to the west of both Babergh and Mid Suffolk Districts and to the east of West Suffolk. A map showing the respective areas of the CCGs operating in the areas where there are cross boundary implications for Babergh and Mid Suffolk District Councils are shown below, representing:

- the NHS Ipswich and East Suffolk Clinical Commissioning Group
- the NHS West Suffolk Clinical Commissioning Group
- the NHS North East Essex Clinical Commissioning Group



Source: Suffolk and North East Essex ICS (March 2020)

Babergh and Mid Suffolk Joint Local Plan growth affects practices in West Suffolk, which include Mount Farm Surgery (Moreton Hall), Ixworth and Stanton. Further collaborative work is being undertaken by the CCGs, Babergh and Mid Suffolk District Councils and West Suffolk Council in the A14 Cumulative Growth study, which will inform a future iteration of the IDP in

due course. The study involves analysis of housing trajectory data from the Babergh and Mid Suffolk JLP Regulation 19 document (November 2020) together with the Babergh and Mid Suffolk 5 Year Housing Land Supply Report (October 2020) and the West Suffolk 5 Year Housing Land Supply Report 2020 (September 2020). The aim of the study is to ensure that health impacts can be considered holistically and mitigated appropriately. The study will provide clarity on the mitigation required at the respective health centres impacted by cumulative growth and will inform how the CCG approach their bids for infrastructure monies from the Community Infrastructure Levy (CIL), in the case of Babergh and Mid Suffolk District Councils.

The health centres particularly concerned under this SoCG which may be impacted by cross boundary cumulative growth are:

- Ixworth Practice
- Mount Farm Surgery (Moreton Hall)
- Stanton Surgery
- Woolpit Health Centre

The A14 cumulative growth study currently being undertaken is expected to be completed during Spring 2021. This study initiated in the context of the West Suffolk and Babergh and Mid Suffolk collaborative work, is being extended to the East Suffolk and Ipswich areas of the A14 as well as to the Newmarket and Cambridgeshire areas of the A14. It is hoped to develop the study into a Project Plan with the CCGs over the Summer of 2021.

West Suffolk Council had commented in respect of health:

'Reg. 18 Plan identifies Thurston as a Core Village and in terms of infrastructure Woolpit Health Centre is identified as serving Thurston but requires expansion to facilitate existing planning commitments and Joint Local Plan growth for the area. The individual allocations make reference to infrastructure requirements, but other than the generic reference to health, they all require improvements to local infrastructure within the village. However, a simple search on the NHS website shows Mount Farm Surgery at Moreton Hall as the nearest GP practice (measured in a straight line) 10 minutes by car via Mount Road, and 17 minutes by train and bus. Woolpit Health Centre is listed as 6th closest in distance (measured in a straight line) after three other Bury St Edmunds practices and the Ixworth practice, via the A14, 9 minutes by car with no public transport alternative shown on Google Maps.'

Section 4.3 of the IDP considers "The local context for patients of Babergh and Mid Suffolk" and details existing provision of GP practices.

Table 15 sets out "Health needs arising from growth of the JLP and new committed growth". It includes healthcare practices "located in neighbouring authorities "as the impact of the growth of the JLP may require mitigation through contributions". In West Suffolk only the GP practices at Clare (a branch of Hardwick House Surgery at Sudbury), Stanton and Ixworth are listed.'

West Suffolk have identified a requirement for an evidence base to identify the impact of growth on health services together with deliverable mitigation to resolve this concern, which will be the responsibility of West Suffolk CCG working in partnership with the local authorities.

It is agreed that following the completion of the A14 Cumulative Growth study as detailed above, that in partnership with the CCGs, Babergh District Council, Mid Suffolk District Council and West Suffolk Council will agree a project plan to determine the following:

- 1) **impact on health services / facilities**
- 2) **mitigation measures**
- 3) **how and when that mitigation will be delivered to ensure health needs are adequately addressed**
- 4) **how the mitigation will be funded**

Transport

In respect of highways, further discussions have taken place with Highways England and Suffolk County Council on Strategic and Local highway matters.

To assess the impact of proposed sites for allocation in the Joint Local Plan on the road network, studies have been carried by consultants WSP using the Suffolk County Transport Model. The studies have been prepared in partnership with Suffolk County Council as the Highway Authority, along with the neighbouring local planning authorities within the Ipswich Strategic Planning Area (including East Suffolk Council for the Suffolk Coastal Local Plan area and Ipswich Borough Council). For the later Model Run (Model Run 9), West Suffolk Council has been engaged in discussion as the Model Run methodology has evolved.

Babergh and Mid Suffolk District Councils and West Suffolk Council are continuing to work collaboratively with Highways England and Suffolk County Council in respect of mitigation measures to address the matters raised by the latest modelling. This includes clarification on how the demand adjustments applied to the transport modelling are considerate of the rural elements of the Districts.

West Suffolk Council had commented in respect of transport:

'Committed and planned growth in the settlements in the A14 corridor west of Stowmarket is: 3,029. In addition, planned growth at Stowupland and Haughley without any of the planned growth at Stowmarket means that there are around 4,000 homes committed and planned in Core Villages in the western part of Mid Suffolk. So cumulatively, with the growth in Thurston, impact the local road network is inevitable. This includes the key routes into Bury St Edmunds and beyond. The trunk route network is accessible via the A14, but, as has been identified by the IDP, there are capacity issues at key junctions in Bury St Edmunds and Newmarket. However, much of the traffic growth at Thurston will use existing county roads, particularly through Moreton Hall, which adds to congestion along Mount Road and the restricted railway bridge, or feeds onto Junction 44 of the A14 which has already been identified as operating at capacity. Alternatively, traffic will access the A143 at Great Barton, placing particular pressure on the Bunbury Arms crossroads, which has a poor accident record, and may have an impact on the Air Quality Management Area in Great Barton.'

Much of the growth in Elmswell, Thurston and Woolpit identified in the Joint Local Plan has the benefit of planning permission and these developments have identified transport mitigation measures.

The Babergh and Mid Suffolk IDP identifies the anticipated highways mitigation measures in relation to the Joint Local Plan proposed site allocations in these settlements as shown below:

Settlement	Anticipated mitigation
Elmswell	<p>Mitigation for the proposed Joint Local Plan land allocations will require:</p> <ul style="list-style-type: none"> - New footway links. - Traffic calming measures (where necessary). - Bus stop improvements (where necessary). - Carriageway improvements (where necessary). - Contributions towards cycle/pedestrian link between Elmswell and Woolpit. - Land to the north of Church Road (LA064), Land to the north west of School Road (LA065) and Land West of Station Road (LA066) – mitigation measures at School Road and Church Road junction (further investigation would be required in relation to any impact on heritage). Capacity issues with junction of New Road / Warren Lane and Church Road / Cross Street would also require further investigation. - Need to also consider and mitigate any impact on level crossings. This will be assessed with a Transport Assessment which is needed to determine the impact on existing network and cumulative impact of development in the area.
Thurston	<p>Mitigation for the proposed Joint Local Plan land allocations will require:</p> <ul style="list-style-type: none"> - New footway links. - Additional bus stops may be required within the settlement. - Traffic calming measures (where necessary). - Contributions towards the railway station accessibility improvements may also be required. - Land to the west of Barton Road (LA085) – carriageway widening with footway are required along Church Road, with priority system under railway bridge. - Major accident cluster site at crossways junction of Barton Road and Station Hill. Impact on railway bridge would need to be fully assessed with Transport Assessment.
Woolpit	<p>Mitigation for the proposed Joint Local Plan land allocations will require:</p> <ul style="list-style-type: none"> - New footway links. - Contributions towards cycle/pedestrian link between Elmswell and Woolpit. - Contribution towards mitigation measures agreed with Suffolk County Council and Highways England for A14 junction 47 (DC/18/04247/OUT). - Land west of Heath Road (LA097) – will likely require widening of the carriageway.

In respect of the transport modelling undertaken, West Suffolk Council have fed into Model Run 9 and raised some concerns as follows:

- That the report does not completely reflect the complexity of the cross-boundary issues between particular land east of Bury and Thurston area. There are some real capacity problems both in the Strategic Road Network (SRN) and the Local Road network, and if the model is only working because the model is deferring some traffic onto the local network then that is also an unsatisfactory solution. Furthermore, if the model makes

different assumptions and there is a highway objection to a planning application for a major strategic site in West Suffolk, then West Suffolk Council have a serious concern and would seek further discussion.

- Adjustments to the numbers and further clarification on the modal shift assumptions for the demand adjustments.
- Would like the mitigation to be discussed further with Babergh and Mid Suffolk District Councils, Suffolk County Council and Highways England.

During the Interim stage of the Statement of Common Ground it was agreed that Babergh District Council, Mid Suffolk District Council and West Suffolk Council would continue to work together in undertaking transport modelling evidence with Suffolk County Council and Highways England to ensure impacts of growth on the transport network beyond the boundaries of Babergh and Mid Suffolk are understood and mitigation is considered. The latest transport modelling (Model Run 9) was published in October 2020 (methodology and results reports). A Technical Note was also published in November 2020 which looked into further sensitivity testing of two specific sites in Bury St Edmunds (BV6 Bury St Edmunds NE and BV7 Land at Rougham Hill).

The modelling carried out to date has enabled the identification of where there is over-capacity and pressure points on the Strategic and Local Road Networks. In collaboration with Suffolk County Council and Highways England, a Highways Schedule of Interventions has been developed to detail the existing mitigation commitments which will contribute to alleviating the impact of the planned growth and shows an understanding of where additional mitigation is required.

The Highways Schedule of Interventions, although in working draft, lists the Strategic Road Network and Local Road Network issues identified from the results of Transport Model Run 9, deriving from planned growth. The Schedule of Interventions also details the anticipated mitigation, the Local Authority where there is mitigation required together with any cross boundary implications with another Local Authority, the lead infrastructure provider, the estimated mitigation costs (where known), the potential funding sources, and the timescales where known. It also aims to look at monitoring in the longer term to assess the impact of growth and the impact of any new mitigation implemented. The Schedule of Interventions will evolve into a Project Plan led by Suffolk County Council with collaboration from Highways England, Babergh and Mid Suffolk District Councils and West Suffolk Council.

The Schedule of Interventions includes improvements around the Strategic Road Network, being the A14, and also includes mitigation of the impact on the Local Road Network. The Schedule of Interventions also looks to feed into a detailed Project Plan, led by Suffolk County Council to determine the following:

- 1) impact on the Strategic and Local Road Networks;
- 2) mitigation measures;
- 3) how and when that mitigation will be delivered; and
- 4) how the mitigation will be funded.

Sport and Leisure

In respect of sport and leisure provision, Babergh and Mid Suffolk District Councils have published a Leisure, Sport & Physical Activity Strategy Summary 2017-2030 (2017), which outlines the top strategic priorities for leisure, sport and physical activity within Babergh and Mid Suffolk.

This document identifies a shortfall of swimming pool provision in Mid Suffolk and the need for some additional provision in Babergh. The strategy focuses on enhancement of existing facilities. It is acknowledged that the deficit will need further investigation and feasibility studies carried out, to provide evidence in preparation of any review of the Joint Local Plan.

The focus on enhancement of swimming provision is supported by improvements to the leisure centre offer in Babergh and Mid Suffolk Districts and also in West Suffolk District.

In Sudbury, there is a focus on improving health and fitness facilities, for example increasing the gym capacity from 40 exercise stations to 100 exercise stations and improving and expanding swimming facilities to address an identified undersupply of swimming lesson capacity. This project at the Kingfisher Leisure Centre in Sudbury was completed in December 2020.

In Stowmarket, there is a focus on improving and expanding health and fitness, swimming and outdoor facilities, addressing an identified undersupply of sports hall provision and swimming lesson capacity.

West Suffolk Council has an agreed business case to provide leisure and community facilities in the form of a new built Leisure Centre including swimming pool. This project will provide the leisure offer for the population of Bury St Edmunds and surrounding villages, including users from the Babergh and Mid Suffolk area.

West Suffolk Council had commented in respect of leisure:

'Given the role of Bury St Edmunds as a Sub-Regional centre, it is likely that many of the residents of the new homes in Thurston will look towards the town for most of their services and needs including leisure, employment and shopping. Given its close proximity, much of that demand is likely to fall upon the Skyliner Gym at Moreton Hall, and the Abbeycroft Leisure Centre on the western side of the town. It is possible that a very small proportion of Thurston residents will access Bury by train and there is a very good cycle link, but many will rely on the private car. Given the overall scale of development proposed, particularly compared to the indigenous growth within the town, it is likely to place significant pressure upon existing services, with no mitigation proposed.'

Note that the Council has not produced an open space, sport and recreation evidence base. We will be producing such evidence for our Local Plan and existing evidence from our (western way) proposal concludes that the catchment area extends into Mid Suffolk – naturally residents and future residents of Thurston and the surrounding are using and will continue to use Bury leisure centre. Many Thurston residents will use public services in the town, and it would be helpful to see evidence for this and a consequential need for appropriate mitigation.'

As detailed above, current provision for leisure resulting from growth in Babergh and Mid Suffolk Districts is being met through enhancements to existing swimming pools and leisure centres. West Suffolk Council have identified an impact on the Bury Leisure Centre deriving from growth in Babergh and Mid Suffolk. Since the Interim position of this Statement of Common Ground, the potential for a proportionate Community Infrastructure Levy (CIL) bid for developer contributions monies has been initially discussed between the authorities. It is understood that further collaborative work will be needed to develop the CIL bid and this will initially be done through a CIL bid Enquiry Form from West Suffolk Council to the Babergh and Mid Suffolk District Council Infrastructure Team.

It is agreed that Babergh District Council and Mid Suffolk District Council are undertaking a programme of investment in leisure facilities within the two Districts, and that further investigation and collaborative work on the need for additional swimming / and provision of

gym and leisure centre facilities will be undertaken with local authorities in Suffolk to mitigate the impact / demand from the planned growth within the Joint Local Plan.

5. Next steps and process for reviewing the Statement of Common Ground

It is agreed that all parties will continue to work collaboratively on matters identified in this Statement of Common Ground as the Joint Local Plan progresses to Examination.

Additionally, the parties will also continue to work collaboratively on:

Health

- **Further collaborative work in partnership with the CCGs to use and develop A14 Cumulative Growth study, as detailed above, into a project plan to determine the mitigation measures to adequately address health needs.**

Highways and transport



- **In terms of cross boundary matters with West Suffolk, developing the Highways Schedule of Interventions into a Project Plan, led by Suffolk County Council with collaboration from Highways England, Babergh and Mid Suffolk District Councils and West Suffolk Council.**
- **Any future transport assessments will be prepared taking into account the cross-boundary impacts and in collaboration with West Suffolk Council in order to assess impact, identify mitigation and delivery of mitigation.**

Sports and Leisure

- **To work collaboratively on addressing the impact of growth in Babergh and Mid Suffolk on the leisure facilities of Bury St Edmunds, with a CIL bid anticipated for proportionate funding of mitigation measures.**

This Statement of Common Ground consists of a final position prior to Submission of the Babergh and Mid Suffolk Joint Local Plan for Examination, and all parties will continue to work collaboratively.

6. Signatories

<div>Signed on behalf of Babergh District Council</div> <div></div> <div>Name: Tom Barker Position: Assistant Director, Sustainable Communities</div>	<div>Date: 26/3/21</div>
<div>Signed on behalf of Mid Suffolk District Council</div> <div></div> <div>Name: Tom Barker Position: Assistant Director, Sustainable Communities</div>	<div>Date: 26/3/21</div>

Signed on behalf of West Suffolk

Date: 26 March 2021

A handwritten signature in black ink, appearing to read 'MSmith', is written over a light grey rectangular background.

Name: Marie Smith

Position: Strategic Planning – Service Manager