

Schedule of Minor Modifications

The minor modifications set out below are published to aid clarity, to provide context and to support the main modifications which are the subject of further consultation. Publication of the National Planning Policy Framework (NPPF) in March 2012 has meant that the document needs to be updated, and the Council has taken the opportunity to update the text and figures where it is considered helpful. These minor modifications are shown as U for updates in the table below.

Following the Localism Act 2011 it will be necessary to alter the terms used in the 2011 Submission Draft Core Strategy. For example, the document is likely to be referred to as the Local Plan 2011 – 2031 Core Strategy and Policies - Part 1 of Babergh's New Local Plan. This would necessitate many changes, the box below shows some extracts from the first four paragraphs of the introduction on page 1 of the document as an example of the changes that will need to be made:

Introduction: Role of this the Core Strategy and Policies document – Part 1 of the Babergh Local Plan

The Core Strategy and policies document is a key document in the new Babergh Development Framework Local Plan. It is a strategic document that

The process for preparing a Core Strategy Local Plan provides for a number of opportunities for public engagement, and consultation with the statutory stakeholders and the local community.....

Once adopted ~~the Core Strategy~~ Part 1 of the new Local Plan will replace some of the more strategic policies in the Babergh Local Plan (Alteration No 2) 2006,.....

The legislation which supports the preparation of the ~~Core Strategy~~ new Local Plan and other policy planning documents is extensive and subject to change. Many such changes are ~~proposed as part of~~ set out in the Localism ~~Bill currently going through parliament~~ Act, November 2011. Further information on current and emerging legislation relevant to the ~~Core Strategy~~ new Local Plan is set out in the supporting Conformity Background Document.

There will also be a need for minor corrections and editing, changes to the contents page, numbering of paragraphs, changes to policy numbers etc. to ensure the final document is clear and as accessible as possible. All such changes will be minor in nature and can be made by the Council on adoption of the Local Plan without the need to be examined. It is not necessary to make the changes at this stage, and so these are not included in this schedule.

The reasons for proposing the “main modifications” are either in response to the NPPF (e.g. new Policy CS0), or in response to representations (e.g. identifying the strategic sites for growth with allocations on maps and more detailed policies). These main modifications have necessitated changes and additions to the supporting text, and most of the minor modifications set out below fall into these categories. These are shown as NPPF or R (in response to representation(s)).

**Convention used to denote modifications to text (all page numbers and modifications refer to Core Strategy (2011 – 2031)
Submission Draft, Part 1 of Babergh’s New Local Plan, published October 2011):**

Text underlined = new text

~~Text shown struck through~~ = text deleted

~~Text struck through and double underlined~~ = text moved from this point

Text double underlined = text moved from elsewhere to this point

Abbreviations used in column 5: *Italics used to describe
modification where necessary for clarity*

U = update

NPPF = a specific change made in response to the NPPF (or to the
Localism Act 2011)

R = in response to rep.

Note: all minor modifications are prefixed MIN and are not being consulted on.

Mod. No.	Page no	Section / paragraph, etc.	Minor modification	Reason for mod.
Section 1				
MIN01	2	1.2	<p><i>Add bullet point:</i></p> <ul style="list-style-type: none"> • Flood Risk 	U
MIN02	4	1.4.2	<p><i>Insert new bullet point after 4th:</i></p> <ul style="list-style-type: none"> • <u>Efficient use and protection of the quality of scarce resources, particularly water and the water environment.</u> <p><i>Insert new bullet at end:</i></p> <ul style="list-style-type: none"> • <u>Need to maintain and respect the character and quality of the built environment and safeguard the future of heritage buildings.</u> 	R R
Section 2				
MIN03	18 - 19	2.1.2	<p><i>Insert additional text in 1st and 2nd paragraphs, and insert 2 additional paragraphs:</i></p> <p>Functional Clusters (or ‘Catchments’) centred on Urban Areas and Core Villages</p> <p>Communities close to Sudbury/Great Cornard and Hadleigh, or Manningtree, Colchester, Bury St Edmunds or Stowmarket, will use these towns to provide everyday services and facilities, even if they have one or two services of their own. Communities close to Ipswich may depend on the town for primary schools and doctors, and may also use town supermarkets for convenience grocery shopping, and therefore may not appear in any of the ‘functional clusters’. The clusters (or immediate catchment areas) associated with the urban areas are illustrated on Map 5 <u>4</u>.</p> <p>These main urban areas <u>and market towns</u> also serve much wider communities for many other needs, including employment, leisure and retail (beyond everyday convenience essentials). The role of the urban areas for the wider needs of communities is reflected in the overall strategy for growth.</p>	R

			<p>Whilst communities close to Ipswich will use services and facilities in the town and many will be employed in businesses located within the Borough, the relationship between the urban area, and the surrounding countryside and villages in Babergh Ipswich Fringe is more complex. For example, this area contains the parish of Sproughton where part of the parish forms part of the urban edge of Ipswich and is separated from the village of Sproughton by farmland and the A14. The former sugar factory and the Farthing Road industrial estate adjacent to Junction 54 of the A14 are also located in the parish of Sproughton (and the Babergh Ipswich fringe), but separated from the village by the A14. Pinewood parish is also located on the urban edge of Ipswich, but is a cohesive community with its own excellent community facilities and services. The sixth form college, Suffolk One, and an important retail and service area, adjacent to the A14/A1214/A12 Copdock roundabout are also within the parish of Pinewood.</p> <p>This area already makes an important contribution to the local economy, with potential for a substantial amount of additional employment opportunities at the former sugar factory site to be created in modern purpose-built industrial and commercial buildings. Retail, service, catering and industrial and commercial businesses in Babergh's Ipswich Fringe provide employment for residents of Babergh, Ipswich Borough, and adjoining authorities such as Mid Suffolk and Suffolk Coastal.</p> <p><i>Insert new heading: Core Villages and additional text, and split 2nd paragraph:</i></p> <p><u>Core Villages</u></p> <p>In addition to Outside the urban areas of Sudbury/ Great Cornard, Hadleigh and the Ipswich Fringe area—the mapping exercise has identified ten larger villages that are at the centre, or core, of hinterlands of smaller villages and rural settlements that form ‘functional clusters’. These larger villages have been identified as Core Villages. Evidence shows that many other settlements regularly look to these Core Villages for various day to day essential needs. As such they have been identified as having an important function within the rural area, and for the communities beyond. The Core Villages are shown on the Key Diagram. The functional clusters which relate to the Core Villages are shown on Map 5.</p>	
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			<p>The settlements identified as Core Villages have a role as such, because they provide <u>been defined as such not because of size or potential opportunities for growth, but because of the role they play providing</u> a number of essential services and facilities to a catchment area of smaller villages and rural settlements. All of the Core Villages identified have 5 or more settlements looking to them for many everyday convenience needs. Although not a factor in defining a Core Village, it is also the case and no coincidence that a <u>All of those listed host some of the key everyday services including a primary school, Doctors Surgery, Convenience shop/ Post office and have access to public transport.</u></p> <p>Whilst this will of course influence the extent to which villages serve other settlements, <u>As with the towns, the relationship between the Core Villages and the settlements beyond them reflects the connections that people actually living there tend to make. It is clearly evident that this is strongly influenced by the geographical location of the settlements, and in particular the proximity to other larger centres, main transport routes, and access to public transport. This inevitably means that many of the smaller rural communities will be in more than one cluster. (The evidence which emerged from the parish and town council mapping exercise informed the functional clusters based on Core Villages illustrated on the map in Appendix 4. Note: this exercise was designed to help determine access to day-to-day services, convenience shopping and community facilities, from the rural settlements and excluded higher level services and facilities such as secondary education, comparison shopping, social and leisure activities.)</u></p>	
MIN04	19	2.1.3	<p><i>Insert at end of 1st paragraph:</i></p> <p>A total of 42 <u>43</u> Hinterland Villages have been identified, and all fall within one or more of the functional clusters described. Many of these villages tend to be small, with very limited facilities, so are dependent on nearby larger Core Villages or urban areas for many of their everyday needs. <u>Sproughton is an example of this and the village of Sproughton is identified as a Hinterland Village in Policy CS1. However, there is a distinct difference between the parish and the village of Sproughton. The built up areas on the urban edge of Ipswich that are in the parish of Sproughton are not considered to be within or part of a hinterland village, and will be considered as part of the urban area of Ipswich.</u></p> <p><i>Insert /Great Cornard after Sudbury in 2nd paragraph.</i></p>	R

MIN05	21	2.1.4 & 2.1.5	<p><i>Insert the paragraph headed “Countryside” before the paragraph headed Brantham.</i></p> <p><i>Insert a new heading above “Brantham”: “<u>Special Areas/Regeneration</u>”, and insert new text to 2nd paragraph:</i></p> <p>There is a major outstanding land allocation in the adopted Local Plan which relates to this area (that is the major industrial site) at Cattawade (Brantham). <u>This needs to be carried forward into this new Plan, as its redevelopment has not commenced yet. More detailed proposals for the regeneration and redevelopment of this large, brownfield employment area can be found in the adopted Local Plan Policy EM06 new Core Strategy Policy CS6a, and the Council is in discussion with the landowners with a view to developing a Master Plan. The redevelopment and regeneration of this site remains an important planning objective that the Council is committed to working proactively to achieve. Brantham is therefore identified separately from the Core Villages as a regeneration project. If a successful redevelopment scheme is achieved for the Brantham industrial area it may lead to a re-assessment of the role that the village plays in the local area. In the meantime, Brantham is identified as a Hinterland Village and proposals for development outside the EM06 site area will be considered on their merits in the context of Policy CS6a.</u></p>	R
MIN06	22 - 23	2.2.3	<p><i>Insert additional text:</i></p> <p><i>1st paragraph:</i></p> <p>From Broad Locations to New Directions of Growth <u>Strategic Land Allocations</u></p> <p>We have considered the constraints, advantages and disadvantages of some potential areas around the towns / urban areas - these were the Broad Locations identified in the Growth Issues and Scenarios document in 2010. From these nine areas four have emerged and have been identified as New Directions of Growth <u>three Strategic Allocations and one Broad Location</u>. The Key Diagram shows two New Directions of Growth <u>the general location of the Chilton Woods Strategic allocation and the Broad Location at Sudbury / Chilton / Great Cornard (identified as Broad Locations 5 and 6 in the Growth Issues and Scenarios document), one at Hadleigh (Broad Location 1), and one in the Babergh Ipswich Fringe (Broad Location 8). Maps A, B and C identify the locations / areas of the three Strategic Allocations and accompany Policies CS3, CS4 and CS5, the fourth is planned to come forward later in the plan period (identified now as a Broad Location) and work on identifying the precise area for growth to the east of Sudbury will involve landowners and the community as part of a programme of work on future Plan document(s).</u></p>	R

			<p><i>Insert and delete in final paragraph:</i></p> <p>Distribution of allocated growth and development is therefore to be shared <u>predominantly</u> between the town centres / urban edges, Brantham and the Core and Hinterland Villages.</p>	
MIN07	22 - 23	2.3	<p><i>Insert changes to 2nd and 3rd bullet points:</i></p> <p>The new employment areas planned as part of the mixed use allocations in the New Directions of Growth;</p> <ul style="list-style-type: none"> • <u>Regular review of employment land and, where appropriate, p</u>Policies to protect existing employment sites; • <u>Designation of Working with partners to identify strategic employment areas (e.g. A14 / Suffolk Haven Gateway);</u> 	NPPF
MIN08	36 - 37	2.8.4	<p><i>Insert paragraph 2.8.4 to follow Main Modification Policy CS5b and insert additional text:</i></p> <p><u>Brantham Redevelopment / Regeneration Area</u></p> <p><u>The policy position on Brantham as a village and its position in the settlement pattern was explained at section 2.1.6. This is likely to be influenced over the Plan period by the presence and redevelopment of a major, brownfield (industrial) site, formerly occupied mainly by Wardle Storey and currently partly by ITW. As a large, under-used (and partly derelict) brownfield site in a gateway position to Babergh district, the Council considers that the ‘Do Nothing’ option for this site is not realistic or appropriate and it is committed to achieving its successful redevelopment / regeneration. The site’s location and characteristics present some important issues to address but also some valuable opportunities and the potential gains from its redevelopment are seen as very substantial. The Council’s approach towards redevelopment involves close joint working with the Haven Gateway Partnership (along with others) and developing a joint evidence base with the site owner’s representatives. Policy CS6a includes appropriate elements of the original Local Plan policy together with a review of the allocation, and updates to reflect the latest circumstances.</u></p>	R

			<p>The <u>existing</u> / former industrial sites at Brantham poses a unique challenge for the District. Much of the site is derelict, with buildings in need of demolition and land in need of decontamination. However, there is a significant and apparently thriving remaining operation by ICI Ltd, known as Imagedata.</p> <p>The site is partly crossed and partly abutted by the main London Liverpool Street to Norwich rail route, and has estuarial frontages. The industrial site is separated from the main village by Greenfield land within the same ownership. Adjacent land is designated as an AONB and as a SSSI. The intertidal mudflats and saltmarsh nature of the adjacent Stour estuary means that the area is also protected as a Special Protection Area (SPA) under the 1979 EU Birds Directive and Ramsar designations under the 1971 Ramsar convention. Unsurprisingly therefore the tongue of land to the south of the railway is of wildlife significance. Parts of the area are subject to flood risk, and proposals for development will be required to comply with PPS25: Development and Flood Risk (or any successor policy documents) address flood risk, including the preparation of a Flood Risk Assessment and sequential test (as appropriate). It is acknowledged that there are challenges and constraints to regenerating this site, but doing nothing is not an acceptable option, particularly where so many local jobs have been lost.</p> <p>Brantham village underwent significant growth in the 1960s and 70s, at the time related to the industrial operation. The site is now ripe for a major regeneration scheme, in accordance with the principles laid down in the adopted Local Plan policy EM06 and the Council's Planning Position Statement of 2008. It will be expected that green infrastructure will be central to the character and layout of such a scheme in accordance with Policy CS10 (particularly with regard to providing mitigation within the proposed development for potential recreational impacts on the SPA and Ramsar site), and that it will deliver new employment buildings, new dwellings and improved community facilities proportionate to the amount of development permitted, all in accordance with an agreed Master Plan. A high quality development will be sought, particularly in the event that riverside development is sought.</p> <p>The masterplan and mitigation strategy will need to ensure that direct and indirect negative impacts on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site are avoided. In particular, provision of alternative Natural Green Space will be required, in line with the Haven Gateway Green Infrastructure Strategy. Provision and funding for the green infrastructure will be provided by the developer(s). It is anticipated that the green infrastructure provision would include creation of a new Public Open Space, for which the design and management plan should aim for a quality suitable for designation as a Local Nature Reserve.</p>	
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MIN09	41	3.1.1	<p><i>Deletion in 1st paragraph:</i></p> <p>The planning system including the draft National Planning Policy Framework (NPPF published in July 2011) aims to ensure that the principles of sustainable development are followed</p> <p><i>Delete all after bullet points lists, and insert new paragraph:</i></p> <p><u>The NPPF (March 2012) identifies “three dimensions to sustainable development: economic, social and environmental”, and sets out the roles that the planning system should perform to manage these dimensions and achieve sustainable development (paragraph 7). The NPPF advises that “to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system” (paragraph 8). Paragraph 14 of the NPPF clearly states that the presumption in favour of sustainable development is at the heart of the NPPF, and should be seen as a “golden thread” running through plan-making and decision-taking.</u></p>	NPPF
MIN10	42 - 43	3.2	<p><i>Insert additional text into 1st and 2nd paragraphs:</i></p> <p>Sustainable development principles combine the three <u>dimensions or</u> elements necessary to achieve an appropriate balance in that development needs to be environmentally, economically and socially sustainable. All three elements are of great importance for the Babergh area and need to be respected. <u>The NPPF advises that “plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development” (paragraph 10). These three dimensions</u> find expression within the Babergh Strategic Plan 2008-18; and for the Babergh area this will mean:</p> <p><u>This Core Strategy and Policies document (and wider BDF subsequent development plan documents) aims to strike an appropriate balance between these three elements, although their achievement does not necessarily conflict. In summary it is possible to identify some key local considerations with a particular bearing on this balance. Local circumstances mean that in transport terms the achievement of environmental sustainability will often not be possible in transport terms, or be very difficult to achieve due to the dispersed rural nature of the district. However, there is the potential for rural areas to not be completely car dependent. Discussion with the Local Transport Authority will always be encouraged to ensure that sustainable transport opportunities, such as Demand Responsive Transport, are maximised. In addition, the</u></p>	NPPF

			environmental sensitivity of the district means that large-scale, on-shore renewable energy generation will often be difficult to accommodate in an acceptable way. For example, wind turbines in unsuitable locations can result in increases in mortality among birds <u>and bats</u> , and European sites	
MIN11	47	3.3.4	<p><i>Insert into 6th bullet point:</i></p> <ul style="list-style-type: none"> ▪ <u>Continued</u> Support support for existing countryside management groups (including the Suffolk Coasts and Heaths and Dedham Vale AONBs will continue, supporting the proven record of) <u>to conserve and enhance the nationally protected AONBs through implementation of AONB management plans for</u> proactive enhancement of the environment in these areas. 	R
MIN12	47	3.3.5	<p><i>Delete final sentence of 1st paragraph, and insert two additional paragraphs at the end of 3.3.5:</i></p> <p><u>The importance of heritage assets to the historic character and distinctive appearance of Babergh district should not be underestimated. The historic environment, typified by timber-framed, plastered, thatched, and tiled domestic and farm buildings, and stone medieval churches, is a precious resource valued by residents, visitors and local businesses, and the attractive historic character of many of Babergh's villages and wealth of traditional buildings is the focus of a healthy and growing tourism sector.</u></p> <p><u>In addition to the NPPF and Local Plan policies, advice and guidance will continue to be provided in line with English Heritage advice (particularly "Conservation Principles Policies and Guidance for the Sustainable Management of the Historic Environment" 2008).</u></p>	R
MIN13	48	3.3.6	<p><i>Insert new bullet point 2, delete 3^d bullet point, insert new text into 4th bullet point:</i></p> <ul style="list-style-type: none"> ▪ <u>Continue to provide advice to owners of Listed Buildings, to promote an understanding of traditional buildings and how they work, and to proactively encourage positive repair and minimal and appropriate interventions to, and enhancement of all traditional and heritage buildings and structures, including those identified as being at risk through being included in English Heritage's Heritage at Risk Register and the Suffolk Buildings at Risk Register.</u> 	R

			<ul style="list-style-type: none"> Continue, where appropriate, to support Conservation Area designations through the positive contribution provided by Conservation Area Appraisals delivered through the Council's Planning Service (shared resource with adjoining Authorities). Continue to progress with the programme to complete Conservation Area Appraisals for the 12 10 remaining Conservation Areas. Continue to provide advice to owners of Listed Buildings, in particular to proactively encourage positive repair and enhancement of buildings identified as being at risk. Provide support and guidance to ensure that <u>the design of any</u> development which may affect historic assets <u>is of high quality</u> and ensure new development makes a positive contribution to local character and distinctiveness. 	
MIN14	48	3.3.7	<p><i>Delete 3rd paragraph and insert new 3rd paragraph:</i></p> <p>The Government have advised local planning authorities that planning policies to tackle climate change should seek to both mitigate and provide for adaptation, and should aim for carbon reduction to zero in new developments, and the provision of renewable energy for residual energy requirements. Policies need to be appropriate to the area, and be based on evidence. Requirements for carbon reduction measures must be viable and achievable in the context of other planning requirements and policy constraints.</p> <p><u>Policies that provide resilience to the impacts of climate change are an essential element of the role planning has in proactively managing the three dimensions – economic, social and environmental – of sustainable development. The following policies consider a range of impacts of climate change and how these can be addressed over the longer term.</u></p> <p><i>Insert minor changes into 4th paragraph:</i></p> <p>Policies CS7 and CS10 set out a framework of criteria for sustainable development, and in addition we need to look at the energy needs of new development and <u>how encourage</u> the provision of renewable energy either on-site, or through community schemes, <u>and</u> (where viable and appropriate) <u>can be encouraged</u> through larger scale generation of renewable energy.</p> <p><i>Insert in bullet point 2 in 11th paragraph:</i></p>	NPPF

			<ul style="list-style-type: none"> assessing the Babergh area for opportunities for decentralised energy to meet the needs of new development, <u>such as the potential for the former sugar factory at Sproughton to benefit from waste heat recovered from the Great Blakenham Energy from Waste project;</u> <p><i>Penultimate paragraph insert Design Council in front of CAGE, and insert:</i></p> <p>.....Building for Life assessment is <u>a toolkit</u> based on 20 criteria</p>	U
MIN15	50	Policy CS7	<p><i>Change to title of policy, and insert additional text at end of Note 1, and add Notes 2 and 3:</i></p> <p><u>Policy CS7: Helping to Reduce Carbon Dioxide Emissions – Design Standards Sustainable Design and Construction Standards</u></p> <p><u>Note 1:</u> Site specific policies for allocated sites and detailed policies for delivering sustainable design and construction and climate resilient development will be set out in Site Allocations and Development Management DPD(s) (t. This will include guidance on the size/scale of development that relevant policies apply to) <u>and a timetable setting out which level of the Code for Sustainable Homes (or equivalent replacement standard) the development is expected to achieve.</u></p> <p><u>Note 2:</u> <u>The local planning authority will determine which residential developments are considered to be “larger scale”.</u></p> <p><u>Note 3:</u> <u>This policy should be read in conjunction with Policy CS10 (including Note 3).</u></p>	U
MIN16	53	3.3.9	<p><i>Insert new 4th bullet point:</i></p> <ul style="list-style-type: none"> <u>Promote healthy living by providing opportunities for exercise;</u> 	R

MIN17	53	Policy CS9	<p><i>Insert text and note:</i></p> <p>Policy CS9: Green Infrastructure</p> <p>Existing green infrastructure will be protected and enhanced. In new developments green infrastructure will be a key consideration and on the larger sites it will be central to the character and layout of development. All new development will make provision for high quality, multi- functional green infrastructure <u>appropriate to the scale and nature of the proposal</u>. Particular consideration will be given to ensuring new provision establishes links with existing Green infrastructure, providing a well connected network of green infrastructure in urban and rural areas.</p> <p>Specific requirements, characteristics and standards of GI provision within strategic sites and larger site allocations will be identified in the Site allocations DPD and where appropriate through master planning mechanisms.</p> <p><u>Note: The local planning authority will determine which development proposals are considered to be on “larger sites”.</u></p>	R
MIN18	55	3.3.11	<p><i>Insert additional text into 4th paragraph under heading “Strategic Developments”:</i></p> <p>Measures to promote <u>healthy living and</u> sustainable living patterns should be outlined, including development of Travel Plans where appropriate. Pedestrian and cycle links are very important in new developments, <u>providing opportunities for regular exercise as well as safe routes to work, school and community facilities.</u> <u>These are particularly these important</u> on the edge of urban areas, and should include access to all workplaces, shops, and community facilities, as well as providing access to the surrounding countryside and open spaces.</p>	R
MIN19	59	3.4.2	<p><i>Insert additional text in 1st paragraph; insert new 4th paragraph; and insert text in final paragraph:</i></p> <p>Sudbury/Great Cornard, Hadleigh and the larger villages provide the shops and services that residents need for their day to day needs (convenience shopping). Sudbury/Great Cornard is the hub of a wide rural area and provides a good range of non-food shops (comparison shopping), services and leisure activities. Hadleigh provides a good range of shops, including individual and specialist shops, <u>there is an allocation from the 2006 Local Plan for a supermarket</u> and <u>the town</u> has an important role as a tourism and visitor destination.</p>	R

			<p>The out-of-town retail and service area at Copdock sits outside this hierarchy of shops and services. It provides an important service facility (petrol filling station, food and rest area facilities) for motorists, park and ride to Ipswich town centre, employment and shopping, and Babergh will continue to support these existing uses. However, an extension in size or further retail uses in this area will not be supported to protect the town centre vitality and viability of Ipswich and Hadleigh, and the provision of local facilities within residential neighbourhoods on the edge of Ipswich.</p> <p>The Council will continue to support the provision of a range of shops, services, leisure, cultural, office, hotels and tourism businesses at a level appropriate in character and to the location in the shopping hierarchy, and will focus growth and expansion in existing towns, villages and local centres. The Babergh District Retail Study identified a need for additional comparison goods in Sudbury. Since the Retail Study was completed permission has been granted for additional comparison goods retail floorspace in Sudbury, but this would not meet the identified need in the Retail Study. The supply could potentially also be met through amalgamating existing shops and small scale redevelopment or intensification of present buildings. There is also a qualitative requirement for making available larger units. The Council will identify a site or sites and make allocations, as appropriate, based on the sequential approach to review and satisfy this need in subsequent DPDs by 2015/16.</p>	
MIN20	59 - 60	3.4.3	<p><i>Delete 1st paragraph and insert new text under the heading "Policy Context":</i></p> <p>Policy Context</p> <p>PPS4: Planning for Sustainable Economic Growth sets out the government's objectives for prosperous economies and encompasses policies for economic growth in urban areas, town centres and rural areas. "Economic development" includes public and community uses and main town centre uses, and the term now also applies to other development which achieves either the provision of employment opportunities; generates wealth; or produces or generates an economic output or product. This wider definition recognises the value to the economy of non-B Class enterprises, including, for example, education, and tourism/hospitality/catering, which are particularly important in Babergh.</p> <p><u>The NPPF sets out the government's objectives for achieving sustainable development by considering three mutually dependent dimensions of planning: the economic role, social role and environmental role; and the whole approach to economic growth set out in the three relevant sections underpins the Framework and the presumption in favour of sustainable development.</u></p>	NPPF

			<p>Paragraphs 18 to 22 advise local authorities on “Building a strong, competitive economy”. As well as support for business generally, national policy requires Councils to identify a range of sites to facilitate a broad range of economic development, including mixed use sites. :</p> <ul style="list-style-type: none"> • <u>plan proactively to meet the needs of business;</u> • <u>recognise and seek to address barriers to investment;</u> • <u>set out a clear economic vision and strategy for the area;</u> • <u>set criteria or identify strategic sites for local and inward investment</u> • <u>support existing business sectors and where possible identify and plan for new or emerging sectors;</u> • <u>plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; and</u> • <u>facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.</u> <p>National policy recognises that town centres are important to the local economy <u>and the heart of their communities</u> and need to be protected <u>supported and enhanced and continues</u> (paragraphs 23 to 27 of the NPPF advise on “Ensuring the vitality of town centres”). Paragraph 28 on “Supporting a prosperous rural economy” <u>sets out what policies in local and neighbourhood plans should do to support economic development in rural areas through re-use of redundant buildings and farm diversification, and seeks to ensure sufficient shops and facilities are available in rural areas to serve people’s day-to-day needs.</u> <u>the sustainable growth and expansion of all types of business and enterprise in rural areas; promote the development and diversification of agriculture; support sustainable rural tourism; and promote the retention and development of local services and community facilities in villages.</u></p>	
MIN21	61	3.4.4	<p><i>Insert additional text in 2nd, 4th and 7th paragraphs:</i></p> <p>Babergh’s Economic Strategy is summarised in Policy CS2 and its supporting paragraphs. The strategy is based on recognising the drivers of our local economy and our existing strengths, and identifying the potential for future new businesses and employment opportunities, <u>monitoring, reviewing and where appropriate</u> protecting existing employment sites and premises, and in ensuring sufficient land is made available to provide for the needs for a diverse range of businesses.</p>	NPPF

			<p>Our approach will be to create opportunities for jobs in these sectors:</p> <ul style="list-style-type: none"> • by supporting and encouraging SMEs; • <u>by regularly reviewing and protecting existing land and premises</u> and allocating new sites in the district in locations that meet the needs of the local economy; • by creating sustainable new mixed use developments; • and through flexible policies that support B and non-B Use Class employment in sectors such as construction, and in the tourism/culture/leisure/hospitality sectors, and <u>encourage</u> new ways of working, particularly home working. <p>The SHG ELR review of allocated sites and joint working with Ipswich Policy Area neighbours (particularly on sites close to the A14) have identified the importance to the sub region of strategic employment sites with good access to the A14, A12 and the Port of Felixstowe. Strategic employment sites within the sub-region that are located in Babergh district will be <u>monitored and reviewed and where appropriate protected</u> for employment development and allocated in the Site Allocations DPD. <u>Working with our neighbours helps the Council to be proactive and identify and aim to meet the needs of businesses and help the local economy strengthen and grow.</u></p>	
MIN22	62 - 63	3.4.5	<p><i>Insert additional text, and make deletions in 3^d, 5th and 6th paragraphs, and delete final paragraph:</i></p> <p><u>Sustainable new development supports economic growth in rural areas, and Appropriate employment opportunities in these locations provide local employment, and offer</u></p> <p>Often opportunities for rural employment in an area like Babergh are associated with tourism. Wherever possible, support for the tourism economy will be encouraged, within the many popular locations in the district. The Government guidance on this issue is clear in PPS 4, that The NPPF requires support should be given to for sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors and which utilise and enrich, rather than harm, respect the character of the countryside, its towns, villages, buildings and other features. It remains necessary however, to ensure environmentally sensitive sites and landscapes are protected.</p>	NPPF

			<p>Tourism related development includes accommodation, and the potential to encourage and enhance the visitor offer in Babergh district will be explored further. As well as the traditional visitor accommodation such as hotels, bed and breakfast, and self-catering accommodation there is a need to meet demand for camping. More UK residents are taking holidays at home rather than travelling abroad (the so-called “staycation”). There is a growing number of leisure experiences, such as festivals, which together with a resurgence in the popularity of various forms of camping from motorhomes and caravans to ready-erected tents and temporary structures, and luxury or glamorous camping (“glamping”), mean that this area of tourism and leisure has the potential to play a part in the growth of the local economy. <u>The Council will support sustainable rural tourism and leisure development where identified needs are not met by existing facilities in Core and Hinterland Villages.</u></p> <p>New development is also required to be located within or close to existing centres and villages. Other, more remote rural locations will only be justified where the required facilities are needed in conjunction with a particular countryside attraction and there are no suitable existing buildings or developed sites available for reuse.</p>	
MIN23	63	Policy CS13	<p><i>Deletion and insertion in b) and final sentence:</i></p> <p>b) <u>the protection support for / promotion of rural businesses.</u></p> <p><u>All proposals for development should comply with other policies in the Core Strategyies and Policies document, particularly Policy CS10, and other subsequent documents as appropriate.</u></p>	NPPF
MIN24	64 - 65	3.5.1	<p><i>Delete 1st paragraph and insert new 1st paragraph; delete paragraph under heading “The Evidence” and insert four new paragraphs:</i></p> <p>It is important that the right kind of housing is provided to meet the needs of Babergh's communities. The established principle (in Planning Policy Statement 1: Planning for Sustainable Development (PPS1) and Planning Policy Statement 3: Housing (PPS3)) is that new developments should provide a variety of housing to stimulate the creation / maintenance of mixed and balanced communities. This applies equally to open market housing and affordable housing.</p>	NPPF + U

			<p><u>There is a national need for more homes. The Government's 2011 Housing Strategy – Laying the Foundations: A Housing Strategy for England – recognises that supply of housing has not kept pace with demand for the last 15 years. Against the overall need for more homes, different groups of people and individual communities have particular demands and, often, urgent needs for different accommodation.</u></p> <p>Babergh's evidence shows that the current housing markets in the district are not fully balanced. This means that particular types and sizes of homes are under-represented. The greatest need in the housing market is for small (one and two bedroom) and medium sized (three bedroom) houses. It is likely that this will remain the case during the plan period. This type of need applies to market housing, intermediate affordable housing and social rented affordable housing. The evidence also shows that the accommodation needs for the elderly or those who need specialist support is currently not fully addressed in Babergh. The evidence predicts that this demand will increase, along with an increasingly elderly population in the district.</p> <p><u>Babergh's stock of housing is predominantly owner-occupied houses and are larger (number of rooms) than the rest of England. However, the average household size has fallen from 2.48 people per household in 1991 to an estimated 2.28 in 2010 and, according to the Government's 2008- based household projections, the average size will fall further to 2.12 in 2031. This means that, overall, smaller homes (1-3 bedrooms) will tend to be required.</u></p> <p><u>If the past trends used in the 2008-based household projections are continued nationally, the number of lone parent households will more than double between 2001 and 2031 and account for nearly 20% of the total increase in households. Given that lone parent households are, proportionately, more likely to live in social housing or live in private rented accommodation supported by housing benefit, a greater demand for affordable homes will, therefore, come from lone parent households. Using the Government's projections, the proportion of lone parent households in Babergh could increase from 4% in 2001 to 7% in 2031.</u></p> <p><u>A further trend will be for more households to be occupied by older people. Babergh is already witnessing this trend. Between 2001 and 2011, households whose head (also known as reference person) was aged 65 or over increased by nearly 2,000, which is more than double the other age groups combined (heads aged 15-64 grew by 570). By 2031, most (57%) of the projected change in the number of households will be in households with a reference person aged 80 or over. By contrast, the number of households aged 40 – 59 are projected to fall by 7%.</u></p>	
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			<p><u>The accommodation needs of the elderly or those who need specialist support is currently not fully addressed in Babergh. This demand will increase whilst the provision of care will be less institutionalised and through increased support services of older people living at home, sheltered housing and close-care housing schemes. Measures to address these particular needs/ demands will require specific attention and the Local Plan has been made to assist in ensuring that the actions of all parties may be directed successfully to meeting the accommodation needs of the elderly.</u></p> <p><i>Deletions and insertions in the three paragraphs under the heading "Local Context":</i></p> <p>Babergh is a rural district with few sites coming forward for larger developments, particularly in rural areas. To balance the housing market in the district, a<u>All but very small developments should provide a mix of house types and sizes in accordance with established needs have the potential to deliver a wide choice of homes and contribute towards sustaining mixed communities.</u> It is not considered practical to require a particular mix of dwellings on very small sites; although these developments should contribute to the overall aims of mixed communities, <u>including opportunities for people wishing to build their own homes.</u> Larger strategic developments will have an important role to play in <u>creating inclusive and mixed communities through</u> addressing the particular needs of disadvantaged groups within the community, including the elderly population and vulnerable groups in the district. <u>Babergh District Council will work with Suffolk's Health and Wellbeing Board in encouraging developers to achieve standards similar to those promoted by the Lifetime Homes and Lifetime Neighbourhoods initiatives.</u></p> <p>Having a policy, by itself, is not enough, and the delivery of a mix of housing and housing supply in the district will be monitored to inform appropriate management actions if and when required. In addition, the site assessment and selection process that will be used in preparing the sSite Allocations DPD will include a range of criteria appropriate to the size, location and constraints (including viability issues) of each site <u>and policies will be developed that address particular needs as appropriate.</u></p> <p><u>Responses at the Issues and Options consultation stage were in favour of including a policy about mix of dwelling sizes and types in the Local Plan to deal with this issue. This was reinforced in feedback to the Growth Issues consultation and engagement with town and parish councils in the autumn of 2010.</u></p>	

MIN25	65	3.5.2	<p><i>Deletions and insertions:</i></p> <p>Nationally, and in East Anglia, Gypsy and Traveller communities are amongst the most deprived groups with poor access to accommodation, health, education, employment and other opportunities. Gypsies, Travellers and Travelling Showpeople have their own specific accommodation needs and the which the Council is required to assess and address these needs. <u>Although a local research study (the Suffolk A Cross-Boundary Gypsy and Traveller Accommodation Assessment) indicated that there are very limited accommodation needs for Gypsies and Travellers within the Babergh District, there are identified shortages of authorised permanent and transit sites overall. for Suffolk was completed in 2007. A review is being undertaken in 2012, the results of which will inform future policy and decisions.</u></p> <p><u>The 2007 Assessment concluded that one permanent pitch is required to meet existing needs and that five sites are required throughout Suffolk (each being 8-12 pitches) to address the trend for unauthorised encampments. Whilst no additional need for permanent pitches has emerged since 2007, the trend for unauthorised encampments has continued.</u></p> <p><u>Babergh will work with Gypsy and Traveller communities, the Homes and Communities Agency (HCA), the County Council and with neighbouring authorities, to meet identified local need for permanent and transit pitches as appropriate. A first step to addressing the need for transit pitches will be to identify sites and agree selection criteria with all other authorities in Suffolk.</u></p>	U + R
MIN26	66	3.5.3	<p><i>Deletions and insertions in first three and final paragraphs:</i></p> <p>The delivery of affordable housing is identified as a key national planning objective (PPS1 and PPS3) <u>Affordable housing is a key priority in Babergh and delivering affordable housing will help</u></p> <p>Affordable housing is a key priority in Babergh. The Council has a good track record in affordable housing delivery and has used a variety of effective approaches to deliver affordable housing in the past including planning obligations, rural exception sites and through the use of Council owned land. However, income in relation to house prices housing in Babergh continues to mean that affordability in the district remains a problem, as emphasised in the most recent local assessments (the Strategic Housing Market Assessment 2009, the Housing Needs Survey 2008, and other information sources) be less affordable than the rest of the country. In 2011, the ration of entry-level purchase prices to median incomes was 6:4; a ratio greater than the rest of the Ipswich Housing Market and almost double the established affordability ration of 2.5.</p>	NPPF

			<p>..... Whilst it is necessary to deliver as much affordable housing as possible, a realistic and achievable target has to be set (as required by national policy in PPS3).</p> <p>Provision of affordable homes in new developments will be determined on a site-by-site basis by considerations such as location, site circumstances and viability, and will be expected to be delivered on site. Where the proposed development is for one <u>or two dwellings</u> only and in other exceptional circumstances where affordable housing cannot be provided on site, a commuted sum will be required <u>instead, to add to the existing housing stock in the locality.</u> The delivery of affordable housing and housing supply in the district will be monitored and this will inform appropriate management actions if and when required.</p>	
MIN27	67 - 68	3.5.5	<p><i>Deletions and insertions in 1st and at end of 2nd paragraphs:</i></p> <p>Traditionally, rural affordable housing has largely been brought forward through the use of a rural exceptions affordable housing policy. Rural exception sites are defined in government guidance and may only be used to provide affordable housing in perpetuity that meets local housing need. and there is E<u>evidence shows</u> that there will continue to be a need for <u>the provision of</u> affordable housing <u>in perpetuity that meets local need in Babergh's</u> rural settlements.</p> <p>..... This way of defining 'local' also helps to give a clearer framework when considering affordable homes schemes that rely for their funding through commuted payments, <u>and is in line with paragraphs 54 and 55 of the NPPF.</u></p>	NPPF
MIN28	70	3.6.2	<p><i>Insert additional text in 1st and 4th bullet points:</i></p> <ul style="list-style-type: none"> • <u>utilities, including waste and telecommunications</u> • <u>community, including health and security</u> 	R
MIN29	72 - 73	3.6.4	<p><i>Delete first four paragraphs and insert three new paragraphs;</i></p> <p>To ensure that the Core Strategy is implemented effectively it is essential that it is monitored and managed. The monitoring framework for the Babergh Core Strategy is set out in the Annual Monitoring Report. This expands on the targets, indicators and contingencies for the monitoring process.</p>	NPPF + U

			<p>Put simply, monitoring is required to check whether the Core Strategy is doing what it says it will and, if not, what action is appropriate to change this. If the Core Strategy is to be effective it must be:</p> <ul style="list-style-type: none"> • Clear about how the settlement strategy, core policies and necessary new infrastructure will be delivered, when and by whom? • Flexible enough to cope with changing circumstances, but also have the ability to cope with uncertainties; • Include clear arrangements for monitoring, so that progress towards delivering the stated outcomes can be assessed and if appropriate redressed. <p>The monitoring framework, identified in detail in the AMR is a detailed schedule. It is helpful to identify broadly what the critical elements are for monitoring purposes and to establish the critical risks. It is not possible to identify all risks, but those which are considered to have the potential to have most impact on delivery are summarised in the table in Appendix 3, together with identified flexibilities / contingencies.</p> <p>Each year the Annual Monitoring Report will indicate progress on the targets and indicators identified in the Core Strategy. Where policies or targets are not being met, or are causing unintended impacts, reasons will be examined and remedial action may be triggered if necessary.</p> <p><u>This Plan will influence a wide range of economic, social and environmental matters that need to be effectively and efficiently monitored. The delivery of new jobs and homes, whilst important, are not the only items that this plan aims to secure. The vitality of town centres, the diversity of living organisms, and the emission of carbon dioxide are also items included in this Plan's objectives. There are also a wide range of other strategies, public and private, linked to this Plan.</u></p> <p><u>Babergh District Council must publish a report on how its Local Plan policies are being achieved at least once a year and will co-operate with other authorities in reviewing its monitoring framework to better match:</u></p> <ul style="list-style-type: none"> <u>• the Plan's objectives;</u> <u>• Government's priorities;</u> <u>• requirements arising from the Sustainability Appraisal and HRA, and</u> <u>• other plans and strategies such as Tenancy Strategies</u> 	
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			The provision of infrastructure (summarised in the table in Appendix 3) also needs to be monitored. Upon charging a Community Infrastructure Levy, local authorities must also publish a report on income and expenditure including summary details on what the CIL has been spent. This report will be a critical link between the implementation of the Local Plan and the application of the CIL.	
MIN30	73	Policy CS17	<p><i>Insert policy numbers in 4th paragraph:</i></p> <p>.....Those infrastructure items currently foreseen are identified in policies <u>CS3</u>, <u>CS4</u><u>CS5</u>, and <u>CS6a</u> in the table</p>	U
MIN31	74	Policy CS18	<p><i>Insert minor changes and delete Note at foot of policy:</i></p> <p>Policy CS18: Monitoring</p> <p>Annual monitoring will track the delivery of development of new jobs and homes. It will assess the effectiveness of the Core Strategy <u>and Policies document</u> and identify any unintended impacts.</p> <p>Any critical shortfalls or damaging unintended impacts will be addressed through management and review as set out in the Annual Monitoring Report, this will include reviewing impacts on the European sites, as required by the Habitats Regulations.</p> <p>Phasing of development will be closely monitored in Sudbury where Policy CS3 provides a trigger for the new broad direction of growth to advance sooner if the Chilton <u>Woods</u> proposal (Local Plan 2006 Policy CP01) <u>CS3a</u> has not progressed sufficiently.</p> <p>The impacts of the Babergh Core Strategy <u>and Policies document</u> on adjoining districts will also be monitored, as will any impacts of Strategies of adjoining authorities on Babergh.</p> <p>The results of this monitoring will be taken into account in the implementation of the Core Strategy <u>and Policies document</u>, in informing other Development Planning Documents, including Development Management Policies and will provide evidence for any future reviews of all or any part of this CS <u>Local Plan document</u>.</p> <p>Note: Monitoring will include considering the requirements of and implications for the Core Strategy of any changes to the planning system through the introduction of new legislation and / or a National Planning Policy Framework.</p>	NPPF + U