

**Note: this version shows modifications made post-Hearing  
May 2013 and is a working draft for guidance only.  
(Text only – no maps)**

## **Babergh Development Framework**

# **Local Plan 2011-2031**

## **Submission Draft**

# **Core Strategy & Policies**

## **Part 1 of Babergh's New Local Plan**



WORKING DRAFT

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# Executive Summary

*Please note that this executive summary is provided for convenience purposes and may not prove suitable as the sole basis for representations on the Local Plan Core Strategy and Policies document*

## 1. Role of the Core Strategy and Policies document

Part 1 of Babergh's new Local Plan, the Core Strategy and Policies document, is a submission draft for public consultation prior to being formally submitted to the Government for Adoption. Following public consultation decisions will be taken by the Council on the need or otherwise for substantial changes to the document. If substantial changes are appropriate further review, analysis, evidence gathering, retesting, sustainability appraisal and further consultation may be required.

The Core Strategy (Part 1 of the new Local Plan) provides a high-level, strategic plan for Babergh for 20 years from 2011 -2031. The policies are intended to be broad and general, overarching policies outlining the strategy for growth and steering growth to sustainable locations. It is essential to appreciate that, with the exception of three strategic allocations, the Core Strategy and Policies document provides generic, overall policy directions and requirements and other subsequent Development Plan Documents (DPDs), that is Development Management and Site Allocations, will provide much more detailed policies covering detailed or specific requirements to cover many elements of development proposals and the site specifics details where new, smaller sites are to be allocated for development (or for other purposes).

For future growth the focus moves away from "targets" and "prescribed numbers" and instead is driven by ensuring provision is made for the right kinds of jobs and homes, in the right place at the right time. The proposed approach was informed by a public exercise in 2010 to review the approach towards growth for Babergh. ~~At the same time, the Regional Plan – the East of England Plan (adopted in 2008) remains in place (until such time as this is abolished by the Government) and there is accordingly a need for Babergh's new Plan to be in general conformity with this document.~~ The Submission Draft Local Plan Part 1: Core Strategy and Policies is considered to be in general conformity with both this and the National Planning Policy Framework (published March 2012).

## 2. Vision and Objectives

The early part of the document describes Babergh district's main characteristics. This goes on to identify the main issues that the Plan needs to address, in relation to environmental, economic and social issues. The proposed Spatial Vision is as follows:

Babergh will continue to be an attractive, high quality place in which to live and work, and to visit. The local character and distinctiveness of South Suffolk will be further enhanced by a strong economy and healthier environment providing the framework for a well connected network of places that is made up of mixed and balanced communities.

The vision therefore seeks to protect and promote the local distinctiveness of Babergh district. This is supported by 8 specific objectives that cover: mixed and balanced communities; economic growth and prosperity; regeneration and renewal; provision of adequate infrastructure; our response to climate change; local character and built / natural & historic environment; rural communities; and phasing of development to manage growth effectively.

These first 2 elements form section 1 of the Submission Draft Core Strategy and Policies document.

### 3. Spatial Strategy (and Settlement Pattern)

In section 2 **Policy CS1** Settlement Pattern Policy and the spatial strategy set out what is traditionally described as a hierarchy of settlements along the following lines:

**Towns** (Sudbury / Great Cornard; Hadleigh, and the Ipswich fringe (Pinewood and Sproughton urban areas)

**Core Villages** (Bildeston; Boxford; Bures St Mary\*; Capel St Mary; East Bergholt; Glemsford; Holbrook; Lavenham; Long Melford; Nayland)

**Hinterland Villages** (includes 43 generally smaller villages that make up the catchment areas for the towns and larger Core Villages) – see **Policy CS1** for list of villages

**Countryside** (includes open countryside, individual or scattered groups of houses or hamlets)

*\*Note: Bures St Mary is a special case as half the village is in Essex and its growth and development will be planned and co-ordinated with Braintree Council and others*

The Core Strategy and Policies document uses a new approach by identifying 'functional clusters' for the rural areas and all of the district's rural tracts are assigned to one or more of these clusters (as some areas overlap). The 'functional clusters' are groups of villages which share common links between them. The larger villages (called Core Villages) provide services and facilities for their own residents and for those that live in smaller villages and rural settlements in a hinterland around them (often overlapping). The villages in catchment areas of these Core Villages we have called Hinterland Villages. The clusters have been identified through local responses to the Growth Review, rather than being identified by the Council. These clusters reflect the way that people may live in one part of the cluster but use other places within it for essential, low-order, everyday services and facilities (such as schools, convenience shops or primary healthcare). One of the most important benefits of the functional clusters approach is that it allows for inter-changeability in service provision, the location of new development (such as how or where rural affordable housing developments are provided and occupation rights shared, where new employment provision is made or recreational facilities provided for a general area).

### 4. Growth and Development

The approach to growth has been reviewed thoroughly and a new approach is proposed. The new Plan is to be jobs-led, rather than homes led. In this way, the starting point is to determine the level of economic growth, new jobs and prosperity to which we will aim. The level of growth in new homes flows then from this level of aspiration. It is considered that Babergh has a realistic opportunity to plan for the creation of an indicative 9,700 new jobs in the 20-year period to 2031, that is just under 500 new jobs per year (485). The economic strategy will work through protecting and allocating sites and premises, promoting a healthy mix of retail and leisure growth in the town centres, planning for the New Directions of Growth identified on the Key Diagram that include employment land, and encouraging growth in new and locally important job sectors such as renewable energy and tourism. Port related growth, particularly at Felixstowe, will also be a very important sector.

There is a need to promote local and wider economic recovery, to promote the economic well-being of the district and greater overall prosperity. Part of the rationale behind this jobs growth is the fact that some of the economic growth needed for Ipswich Borough (which is tightly constrained by its boundaries), to ensure that growth there is balanced and sustainable, needs to fall within its larger neighbouring districts including Babergh and Suffolk Coastal districts. The location of these new jobs in the Ipswich fringe areas means they would be well located for residents of either district. This also reflects the duty upon these local authorities to co-operate in planning ahead for the future.

The level of new homes to plan for is ~~in line with that of the regional Plan (or RSS: at approximately 300 per year, which is just above the 280 annual RSS figure and will compensate for some previous under-provision since 2001)~~. The net effect is a need to find and allocate enough new sites to provide for 2,500 new homes over the Plan period to 2031. It is considered that this number of homes is evidence based ~~and conforms with the regional Plan~~. The emphasis in planning for new homes will be much more about ensuring that we provide the right kind of homes (that is those of high quality design, sustainability, affordability and provided in the right locations where most needed and beneficial) rather than a very high volume of new homes. This will also ensure that settlements in Babergh are not swamped or overwhelmed by a level of development that is out of scale with existing communities but instead setting a level that also meets identified, essential needs.

Distribution of growth is radically different from earlier proposals. Urban areas will need to accommodate some growth between them, primarily based on comprehensive, master-planned new strategic extensions. Rural areas will also be part of the growth strategy and will be allowed to grow “organically” to suit local needs and circumstances. This strategy introduces greater flexibility for growth in the rural areas. ‘New Directions of Growth’ on the edges of the three urban areas of Sudbury / Great Cornard, Hadleigh, and the Babergh Ipswich Fringe will accommodate nearly two-thirds (60%) of planned growth. The distribution of the suggested homes growth is based on the following urban – rural split; 60% across the 3 urban areas and 40% across the rural areas. A total 2,500 new homes is planned in Babergh for the 20 year period, to be distributed as follows:

850 dwellings at Sudbury / Great Cornard, (split between an extra 350 in the vicinity of the already allocated Chilton Woods development and a further 500 to be brought forward to the immediate east of the town, at a new location and phased later on)

- 250 dwellings at Hadleigh (to the town’s east)
- 350 dwellings in the Babergh Ipswich Fringe (to the west of the existing urban area in Sprooughton parish) and
- 1,050 dwellings to allow for appropriate levels of growth in the Core and Hinterland Villages
- The Brantham Regeneration Project is likely to result in some new dwellings coming forward toward the end of the plan period, but as this complex project is at a very early stage the total of new homes planned for Babergh does not rely on an allocation of housing numbers at Brantham.

It should be noted that whilst the Core Strategy and Policies document generally does not go into site specific detail (other than identifying strategic, urban edge growth areas) existing sites allocated for new employment growth or homes in the adopted Plan (of 2006) remain mostly unaffected by this new Plan document (with an exception of the planned Chilton Woods development at Sudbury / Chilton, for which further expansion is allowed). If any existing allocated sites need to be reviewed, or new sites allocated, this would fall to the subsequent site specific allocations document, which will follow as Part 2 of the new Local Plan.

Proposals for redevelopment of the Brantham industrial site are still at an early stage and it is therefore not possible to predict the number of homes that may be delivered as part of that scheme within the plan period and separate these from the numbers of sites and quantity of dwellings that will need to be allocated among the many Core and Hinterland villages (**see Policy CS2**), and so the existing settlement at Brantham has been included as a Hinterland

Village for planning policy and the former industrial area at Cattawade is identified as the Brantham Regeneration area. The Core Strategy and Policies document sets out a strategy for growth and change for each main area of the district. **Policy CS3** provides the strategy and planned approach for Sudbury / Great Cornard. **Policy CS4** does the same for Hadleigh and **Policy CS5** does this for the Ipswich fringe (Pinewood and Sproughton).

Allocations for specific sites in the Core and Hinterland Villages will be made in the Site Allocations document and **Policy CS6** allows flexibility for developments of appropriate scale and form to come forward for these villages that are not specifically allocated. The strategy therefore allows for some rural growth, which has been identified locally as important to sustain the existing rural settlement pattern and existing rural communities. This growth will be integrated with existing villages to ensure that it is sustainable and otherwise acceptable in planning terms.

## **5. Sustainable Development**

Section 3 of the Core Strategy and Policies document deals with sustainable development and the new presumption in favour of sustainable development. The UK planning system remains underpinned by the need to ensure that development and growth are sustainable. In practice this means:

- Planning for prosperity (an economic role)
- Planning for people (a social role)
- Planning for places (an environmental role)

The Core Strategy and Policies document describes the local Babergh approach to sustainability, which is to respect the importance of all 3 of these considerations. In general this will require finding the right balance between these 3 elements and where that balance lies may vary from case to case according to the merits of the particular context, situation and development proposed. **Policy CS10** provides the over-arching policy coverage in this area and will apply to all proposals in respect of sustainable development (although elements of this will often have limited application to the smallest, domestic scale developments or alterations).

The Core Strategy and Policies, via the above settlement hierarchy, will direct the largest scale development to the most sustainable locations. These largest developments will be strategic in scale and nature and planned as sustainable, new, mixed and balanced communities. Planning for these developments will ensure that they are designed to incorporate sustainable development features, co-ordinated with transport provision, with good access to existing community facilities, services and open space in urban areas, together with new facilities and services where necessary. Design of new development on the larger and strategic sites will focus on enhancement and in particular have green Infrastructure central to the design concept of sites.

The Plan has a strong emphasis on planning for infrastructure provision alongside development (see Appendix 3). Similarly, timely provision of physical, green and social / community infrastructure will be planned to meet the needs of Babergh's communities. An example is the provision of high quality, new healthcare facilities to serve the Sudbury and Great Cornard area and this proposed development is already under consideration.

## **6. Built, Natural & Historic Environment; Climate Change; and Green Infrastructure**

Section 3 also addresses the environment in all its forms (including landscapes, the estuarial coast and biodiversity, etc.) and these will be conserved to protect the district's environment, which is of considerable value and diversity. Babergh has 2 Areas of Outstanding Natural

Beauty and biodiversity sites of national and international importance. Accordingly, development will be directed away from sites of landscape or other conservation importance and areas at risk from flooding (unless it concerns the regeneration of previously developed land and includes adequate measures to protect the development from flood risk for its planned lifespan). A strategy is provided (at 3.3.4) for environmental enhancement of the district, as follows: 'Opportunities to enhance the rich and varied environmental resource in Babergh which comprises: the estuaries, river valleys, AONBs, biodiversity and Geodiversity areas, open spaces, countryside, heritage assets, conservation areas and historic buildings, will be positively encouraged'.

This will include working collaboratively with our partners in these areas (such as countryside management groups), provision of new natural greenspace where opportunities arise, the use of developer contributions alongside new development, requirements upon new development to incorporate suitable environmental measures, natural habitat improvement etc. The chosen development strategy has been planned to minimize harmful impacts on the 2 river estuaries in particular (Orwell and Stour) as 2 key areas of ecological value but also sensitive to harm. A monitoring programme will also be used to ensure proper understanding of the condition of these ecological assets and any adverse changes to them. Planned **mitigation compensation, identified by the mitigation** measures will also be activated if the monitoring programme indicates these to be necessary.

A strategy is also provided (at 3.3.6) for the conservation and enjoyment of the historic environment. The historic environment has particular importance in Babergh, a district with around 4,000 listed buildings (of national importance) and 29 designated Conservation Areas. Babergh also has other historic features, such as Scheduled Ancient Monuments and designated historic parks and gardens. The strategy aims: 'to continue to conserve and enhance the heritage assets throughout the district for the benefit of all to enjoy and to enrich the quality of life and learn from local knowledge and understanding of the past through these assets and ensure they are safeguarded for future generations to enjoy and learn from'.

Climate change has increased in stature as an issue that needs addressing locally and at all other levels. Addressed at section 3.3.7, a comprehensive climate change strategy is provided. This focuses on minimizing carbon release and cleaner new energy technologies. The focus of much of the district's new growth in new, sustainable, urban extensions will allow for such issues to be addressed from the initial planning stage of these developments. The use of a specialist Sustainability Support service is also underway to help refine the Babergh approach further and the Council is supporting Suffolk County Council's Greenest County initiative. Work is underway to assess potential (onshore) areas for wind energy generation; although most wind energy generation is being directed offshore. On the strength of current knowledge, the district's constraints suggest the main potential is likely to be around smaller scale community based renewable energy generation (and larger scale production where viable and appropriate). In terms of transport issues, the district's very rural nature is expected to continue limiting potential for more sustainable travel modes in future (except in the towns) although travel plans will be sought for larger developments and protection of existing local facilities together with encouragement for new such facilities (such as farmers' markets) will help to reduce 'food miles' and their adverse impacts.

The Council also looks to non spatial measures that include support for energy conservation for homes in the district, as this also helps address fuel poverty and the health agenda. Similarly, the introduction of requirements for higher sustainability standards in new residential developments, measures such as 'Building for Life' and increased permitted development rights for sustainability measures all serve to ensure that new homes are built to cut carbon and to offer other benefits (such as improved water conservation). **Policy CS7** seeks to reduce carbon emissions and sets out residential design standards (including those

for both major residential developments via the Building for Life Silver Standard and for non residential developments via the BREEAM 'Very Good' standard). **Policy CS8** deals with the approach to renewable and low carbon energy, focusing on the 'New Directions of Growth' and large-scale new developments, but also encouraging low and zero carbon technologies in other developments. The policy encourages community type initiatives in this area (which are typically of relatively modest scale).

Green infrastructure is dealt with at section 3.3.9 and is a key element of the Core Strategy and Policies document for a number of reasons, including its benefits to the quality and setting of new development; its role in the health agenda and opportunities afforded for recreation; its promotion of biodiversity and role in helping to relieve visitor pressure on the internationally important designated biodiversity sites. **Policy CS9** Green Infrastructure sets out requirements for protection and enhancement and its provision in new developments, including encouragement for establishing new networks of Green Infrastructure.

The issue of Brownfield (previously developed) land is covered at section 3.3.10, with Babergh's approach set out here. This includes the preference for redeveloping brownfield land over greenfield land to apply equally to all forms of development and to attach greater weight to ensuring sustainable developments, quality and good design, and less weight to the priority of the re-use of brownfield land in considering proposals for development. A target of 45% brownfield land re-use is proposed as the level for local monitoring purposes to measure performance in this area.

## **7. Town, Village and Local Centres**

Town, village and local centres will play an important role in delivering the overall economic strategy and provision of new jobs. They act as the focal point for their respective wider towns and villages. These are addressed by **Policy CS11** and this maintains the prevailing policy approach of protecting and enhancing their vitality and viability, directing those forms of development suitable to them (such as retail) to the existing centres and providing policy safeguards to address potential adverse impacts of some proposals.

## **8. Local Economic Strategy and the Rural Economy**

The district's wider economic strategy was summarised in **Policy CS2** (and supportive text) earlier on. For the delivery of new jobs to meet the indicative level of 9,700 to 2031, sections 3.4.3 onwards describe key sectors of particular strength in the Babergh context, including: ports and logistics; information and communications technology; manufacturing; tourism (and related areas); non traditional 'B' class jobs (such as teaching, health, etc.); and those based on the rural economy including rural/agricultural/diversification activities (including food processing, farm shops / farmers' markets). **Policy CS12** encourages the growth of these sectors and aims to ensure local benefit from them. The strategy also recognises the role of various different parts of the district in economic growth and relationships with neighbouring areas.

One element of the district that contributes significantly towards the economy and jobs is the rural areas and rural activities. The district enjoys important advantages in this respect, such as its quality of environment, location beside two estuaries and proximity to the sea, and relatively good access to London and wider south-east. **Policy CS13** reflects the proposed, positive approach towards Babergh's rural economy, essentially representing a continuation of the previous planning approach. This provides for agricultural related activity and diversification, re-use of rural buildings, sustainable tourism, renewable / low carbon industries, rural business workspaces and the well-being of the many rural businesses.

## 9. Mixed and Balanced Communities

The overall objective of providing good quality homes for all (whether to own or rent) is supported (see section 3.5) and has long been a Babergh priority theme, although a high housing volume approach does not represent the most targeted way to balance local housing markets for Babergh. Providing the right kind of homes (where needed) will be the focus of the strategy and seeking to promote balanced communities, allowing for a diversity of people at different stages of life and in different circumstances. **Policy CS14** Mix and Type of Dwellings has been included at the Core Strategy and Policies stage because it is fundamental to the overall strategy. In short, this looks to ensure provision of the right type and size of new homes in line with locally identified needs (predominantly small and medium sized homes). This also provides for more specialist needs, such as those for the elderly, or where required, Gypsy and Traveller pitch provision (generically). As a non strategic Core Strategy and Policies issue, any necessary Gypsy and Traveller (or similar) provision will be addressed primarily in subsequent planning documents.

A short-term affordable homes delivery target of 500 new affordable homes from 2009-14 (100 per year) reflects the Council's current programme, and is based on significant actions by and on behalf of the Council. Similarly, an indicative figure of 500 new affordable homes is proposed for each 5-year period thereafter (although economic recovery may allow for an upward revision). In order to maintain affordable homes delivery in the face of current difficulties, Babergh's approach has been revised. There maintains a requirement, under **Policy CS15**, for new residential developments to provide affordable housing at a level of 35% of the number of new homes provided (or otherwise an appropriate level of financial contribution where appropriate) – provision to usually be on site (for larger developments) but for smaller schemes the contributions route will often apply. Individual affordable homes requirement targets may be set in subsequent documents for particular developments. The new proposed approach is for all residential developments to provide affordable housing to these proportions (unless it can be demonstrated that this is not possible).

**Policy CS16** Rural Exceptions (Affordable Housing) Sites provides an updated approach to these developments, with new locational criteria to ensure adequate guidance for their site selection process. Greater flexibility is allowed for, including in particular a relaxation of the specific requirement that these abut the built up area boundaries of villages.

## 10. Implementation, Infrastructure & Monitoring

At section 3.6 this part focuses on implementation of the Core Strategy and Policies document (and subsequent development plan documents) and cites the role of proportionate evidence which is endorsed as an overall principle in Plan-making and planning decisions. This includes financial viability matters, although the evidence employed in this regard is often more complex in nature than many other forms of evidence.

An infrastructure delivery strategy is set out at section 3.6.2, covering all 3 areas of physical, green and social / community infrastructure. The infrastructure plan proposals have been developed as far as possible in advance of a final, adopted Local Plan and accordingly, a final, adopted, locational strategy for development, including development quantities, forms, timing etc. This requires the co-ordination of actions by others, including infrastructure providers like utility companies and agencies like the Highways Agency. For the short-term, the use of planning obligations (legal agreements) alongside new developments will continue to feature here but in the longer term, as the Council develops and puts its own Community Infrastructure Levy in place, this is expected to be the principal route through which new infrastructure (of all forms) is provided. **Policy CS17** Infrastructure Provision sets out these arrangements and requirements for (physical, green and social / community) infrastructure provision and improvement and protection of existing facilities and services. Financial and other delivery arrangements under this policy include use of planning conditions, legal

agreements and also the new Community Infrastructure Levy. Phasing of new development (in general terms) is also covered by this policy.

Section 3.6.3 introduces the delivery and monitoring framework for Part 1 of the Local Plan and this sets out the delivery and implementation arrangements for each of the policies in turn. Many of these will be implemented through the development process, as regulated by the development management (or planning control) function. However, a common theme is the need for collaborative partnership working between a wide range of organisations, of which Babergh is only one. A summary table for this is provided at Appendix 3.

Monitoring arrangements for the Local Plan are addressed at section 3.7 and this will primarily be done through the Annual Monitoring Report (AMR) process. The approach to the Babergh AMR is being reviewed to ensure closer focus on its primary role of reporting on implementation and delivery of new Plans for Babergh. Other external monitoring and information gathering activities are likely to be reduced or eliminated. The targets and indicators of the Local Plan will be reported on annually to ensure that there is adequate understanding of how far its objectives are being achieved alongside any other outcomes or consequences that it may have. **Policy CS18** Monitoring deals with the process for monitoring the Local Plan, including cross-boundary working, any harmful impacts on the highest level designated biodiversity sites, phasing of development for Sudbury/ Great Cornard, setting the context for subsequent planning documents and for future reviews of the Core Strategy and Policies document.

Appendix 1 provides a list of existing Babergh Local Plan (2006) policies to be replaced by the Core Strategy and Policies document

Appendix 2 sets out the envisaged housing trajectory and how the delivery of new homes over the Plan period is forecast to progress in practice

Appendix 3 integrates the overall Local Plan policy implementation arrangements with outline infrastructure delivery arrangements, grouped by each respective policy in this Core Strategy and Policies document

## Section 1 – Introduction and Context

### 1.1 Introduction: Role of 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 Local Plan. It is a strategic document that sets out the long term spatial vision and strategy for the Babergh district, including in particular, our recognition of the importance of working with other organisations to achieve this. It deals with strategic issues such as how we should plan, deliver and manage growth and development in the district over the next 20 years (up to 2031) but it does not deal with detailed issues such as site specifics, or policies dealing with either localised or non-strategic matters. The detailed issues will be addressed in subsequent documents.

The process for preparing a Local Plan provides for a number of opportunities for public engagement, and consultation with the statutory stakeholders and the local community has already taken place on: The Issues & Options for the Core Strategy (April / May 2009); and Growth Issues and Scenarios (October / November 2010). Following the consultation on this Submission Draft, the document will be submitted to the Secretary of State, together with any amendments appropriate for Examination in Public, before being finally adopted.

Once adopted Part 1 of the new Local Plan will replace some of the more strategic policies in the Babergh Local Plan (Alteration No 2) 2006, and these are listed in Appendix 1 of this document. All other policies in the Adopted Babergh Local Plan will remain relevant until they are replaced by other (Development Plan) Documents.

The legislation which supports the preparation of the new Local Plan and other policy planning documents is extensive and subject to change. Many such changes are offset out in the Localism Act, November 2011. Further information on current and emerging legislation relevant to the new Local Plan is set out in the supporting Conformity Background Document.

One of the key changes which has influenced the approach taken in Part 1 of our new Local Plan relates to the way in which the level of growth is determined. In the past the level of growth for jobs and housing has been determined by targets, set at a regional level. The new agenda allows for a more local approach to be applied to establishing the appropriate level of growth for the area, which could be described as a “bottom-up” approach. This is reflected in this draft of the Core Strategy and Policies document, as local evidence, indicating need, trends and aspirations which have been used to inform the growth levels for jobs and homes in Babergh for the next 20 years.

### 1.2 Structure of the Core Strategy and Policies Document

Part 1 of the Local Plan, the Core Strategy and Policies document, comprises three sections as follows;

- **Section 1** - sets out the vision, objectives and context for growth in Babergh;
- **Section 2** - sets out the strategy for growth and distribution and the overall approach; d
- **Section 3** - addresses how that growth will be delivered and managed and indicates the broad considerations which will apply to future development.

The document is concise, but functional, providing a summary of the context for each of the main elements included within it. More details on the key elements of the Plan will be provided in supporting technical background documents:

- **Conformity** (legislative background, Government changes, national policy context and conformity issues)
- **Spatial Strategy**
- **Economic Strategy**
- **Housing and Affordable Housing**
- **Environment and Climate Change**
- **Flood Risk**

#### **Evidence base**

In addition to the material that will be described and referenced in the supporting technical background documents the Core Strategy and Policies draw on an extensive evidence base which can be found at:

<http://www.babergh.gov.uk/Babergh/Home/Planning+and+Building+Control/Local+Development+Framework/>

### **1.3 ~~Summary of Position on the Regional Spatial Strategy (RSS) (The East of England Plan, adopted 2008)~~**

~~In preparing Part 1 of the new Local Plan the Council has had regard to the adopted RSS and it is considered that the draft Core Strategy and Policies document is in general conformity with it. This is notwithstanding the likelihood that the East of England Plan will be revoked relatively soon, as all RSSs are expected to be abolished through the above-mentioned Localism Act. Acknowledging the evolving changes proposed to the planning system, this document has been prepared with a strong emphasis on the need to reflect local circumstances, needs and preferences as key guiding considerations, along with the other extensive bodies of evidence that we have gathered, interpreted and applied as relevant to, and suitable for, the locally distinctive circumstances of Babergh. In a similar vein, the evidence used to inform both the adopted RSS and the emerging RSS (review to 2031) is accepted overall and remains both relevant and applicable to the formulation of this new Plan document.~~

~~Please note that further information on this matter will be included in the supporting technical background document dealing with 'Conformity'.~~

### **1.4 Key Characteristics and Issues for the Future**

#### **1.4.1 Environmental Characteristics**

The Babergh District is mainly rural in character and covers an area of 230 square miles (596 square kilometres). It has two main towns, the market town of Sudbury in the west and the smaller town of Hadleigh located centrally within the district. On its immediate fringes lie the towns of Bury St Edmunds to the north, Ipswich to the east and Colchester to the south.

The landscape is both varied and attractive consisting largely of undulating arable farmland interspersed with river valleys, and is framed on the eastern and south-eastern sides by the Orwell and Stour estuaries. These estuaries have a distinct and precious character, and valued wildlife habitats. Both these areas are designated as Ramsar (international designations) sites and Special Protection Areas (European designations). Much of the rest of the district is also recognised for its value with a wealth of designated areas from SSSIs, AONBs to listed buildings and conservation areas to name a few. Map1 below illustrates the extent that Babergh's environment is valued and protected.

**Map 1: Babergh's Environmental Characteristics**

WORKING DRAFT

## 1.4.2 Key Environmental Issues

- Some parts of the district are at risk from flooding, especially along the river valleys and estuaries. It is important that this risk to lives and property is not increased and that any impacts are managed and mitigated.
- There is a need to reduce the amount of waste going to landfill as space rapidly runs out in Suffolk and other parts of the region. The amount of waste that is recycled or composted in Suffolk increased to 50.6% in 2009-10. Recycling in Babergh contributes to this rising from 33% in 2005-6 to just over 40% in 2009-10. (Suffolk Waste Partnership 2009/10 Annual Report).
- Reducing CO2 emissions significantly reduces the impact of climate change. It is important that we continue to look at ways to contribute to reducing climate change in the district including more sustainable energy generation and energy use / conservation.
- Traffic congestion and air pollution due to traffic are also important issues in some parts of the district. The potential pollution hotspots relate to the A12 and A14 trunk roads and the A131 southern approach to Sudbury, which carry relatively high volumes of fast-flowing traffic. The Ballingdon Street, Cross Street and Church Street area of Sudbury has been designated an Air Quality Management Area (AQMA) as a consequence of traffic congestion and air pollution.
- Efficient use and protection of the quality of scarce resources, particularly water and the water environment.
- Adequacy of infrastructure, in terms of its extent and coverage, capacity, condition/state of repair etc.
- Development close to protected areas may have negative impacts such as disturbance and decline of protected wildlife, changing a cherished view, or creating congestion that affects both residents and visitors. It is important to strike a balance between the need for new jobs and homes and protecting the most important habitats, views and buildings for the future.
- Need to maintain and respect the character and quality of the built environment and safeguard the future of heritage **buildings assets**.

## 1.4.3 Economic Characteristics

Babergh District has a diverse economy with a strong manufacturing sector and distribution, hotel and restaurant sector, a declining agricultural base (in terms of simple employment numbers only) although this sector makes a larger contribution to the economy than is typically the case regionally and nationally) and a tourism industry with significant growth potential<sup>1</sup>.

In terms of the size (e.g. ratio and scale of component employment sectors, business density, levels of productivity, rates of new business formation, etc.), Babergh's local economy is less than half the size of the average for districts in Britain. However, the district has maintained a low level of unemployment through and since the recession (3% of the economically active population in 2008 - a lower level than for Suffolk, the East of England and the UK). In 2007 Babergh contributed to almost 21% of the jobs in Suffolk<sup>2</sup>. The average gross earnings in Babergh are below the Suffolk average (£32 per week less in 2008) and well below the national average (£144 a week less in 2008). Data from the 2001 Census (the latest available) showed that 43% of the workforce in Babergh travel outside of the district for employment, and that 5% of the workforce in Ipswich Borough, 3%

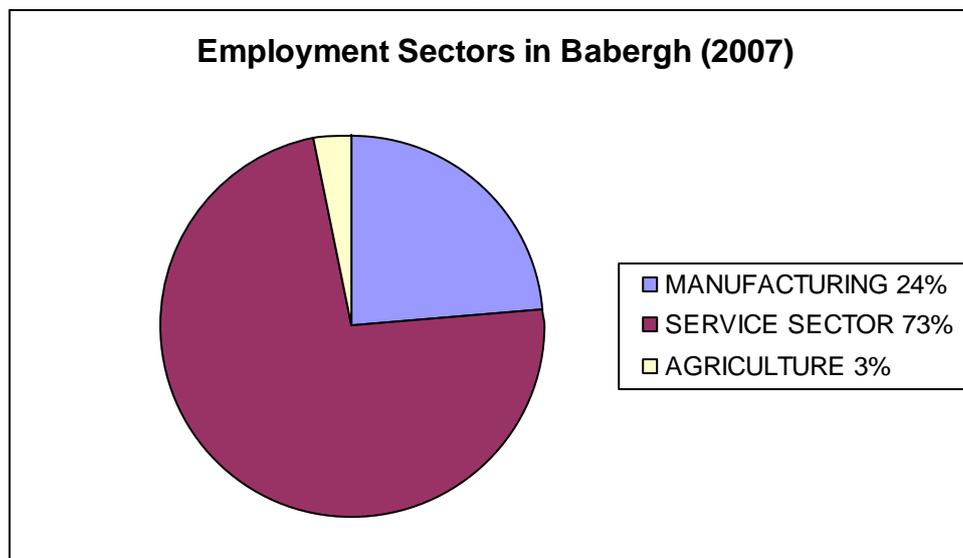
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<sup>1</sup> GVA Grimley, Employment Land Review, 2010

<sup>2</sup> Suffolk County Council, 2008

of Mid Suffolk workforce, 2% of the St Edmundsbury workforce and 2% of the Suffolk Coastal workforce travel to Babergh for work.

Figure 1



Note: The manufacturing sector is notably higher than that in Suffolk. The District has smaller than usual numbers of people working in the Transport & Communications and Public Administration, Health & Education sectors<sup>3</sup>.

The market towns of Hadleigh and Sudbury, together with the Ipswich Fringe, make a significant contribution towards employment in the district, but a notable proportion of employment opportunities are also provided elsewhere in the district. The employment sectors or categories that are important to the local economy have been identified using the Babergh profile 2010 (SCC) and local sources of information:

- Manufacturing
- Retail and Town Centre services (e.g. banking)
- Tourism / leisure / hospitality (ranging from farm shops to craft centre, specialist shops e.g. antiques, to hotels, pubs and restaurants, museum etc.)
- Public service – including education, health and local government
- Distribution / warehousing including Port-related distribution businesses
- Marine activities and operations (ranging from boat building and chandlery to leisure related services associated with sailing and visitors – from locations such as Foxes Marina, Woolverstone, Webbs (Chelmondiston), and Shotley)
- Rural Employment Areas / Industrial Estates / Business Centres and rural diversification businesses (this category will range from farm diversification and conversion of redundant farm buildings to long-standing rural businesses and industrial estates on former airfields)

These sectors / categories of employment are shown on Map 2 as small, medium, or large circles to denote the relative strength of that sector in that location. Whilst this is not precise it does demonstrate the 'geography' of the local economy and illustrates the relative strength of manufacturing, and importance of tourism and leisure to the area.

<sup>3</sup> Annual Business Inquiry, 2008 and GVA Grimley, Employment Land Review, 2010

**Map 2: Distribution of Employment Sectors in Babergh**

WORKING DRAFT

#### 1.4.4 Issues for the Local Economy

- Promoting the drivers of our local economy and our existing strengths, and identifying the potential for future new businesses and employment opportunities in the district. Planning policies cannot create new businesses but they can create a positive environment for business growth and job creation.
- Gaps in the skills and education base - Babergh performs better than the GB average up to and including GCSE Level (NVQ2), but less well at A Level (NVQ3) and above<sup>4</sup>. Many young adults move out of the area seeking higher education, higher paid employment and, sometimes, housing opportunities.
- The number of Job Seekers Allowances has risen significantly in the district between 2007 and 2010<sup>5</sup> reflecting the difficulties experienced as a result of the economic recession in the country.
- Income levels and salaries / wages do not compare favourably with other areas overall.
- Babergh, together with Mid Suffolk, has the largest proportion of outward commuting workforce in Suffolk<sup>6</sup>.
- Communications need improvement, both in physical and electronic terms (including road / rail links and broadband technology, plus mobile telecommunications).

#### 1.4.5 Demographic and Social Characteristics

It is estimated that Babergh had a population of 85,800 in 2009. This was 12.3% of the population of Suffolk County and the second smallest district in the County. Map 3 illustrates the population breakdown around the district, indicating the population levels in the urban areas, the larger settlements and the proportion within rural areas.

Babergh has two main centres of population. The largest town is Sudbury and Great Cornard, which had a population of over 21,000 people in 2009. Sudbury and Great Cornard have distinct and unique characteristics, features and communities. However as a result of their location adjacent to one another and other similarities that they share, Sudbury and Great Cornard are considered for planning purposes as one town and are referred to as such in the remainder of the document. Hadleigh, the second largest town, had a population of over 8,500 in 2009<sup>7</sup>. Babergh's north east edge includes part of the larger urban area of Ipswich. This area, known as the Ipswich Fringe, includes Copdock & Washbrook, Pinewood, Wherstead, Sproughton and Belstead, which together have a population of 7590.

Babergh's population rose by almost 4% over the period 2001-2007. It **is was** predicted that the population will rise by 4.9% between 2001 and 2021 to 87,900<sup>8</sup>. This **is was** lower than the predicted average growth for Suffolk.

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<sup>4</sup> Suffolk Observatory, 2008

<sup>5</sup> Suffolk Observatory, 2008 and Suffolk County Council, 2008

<sup>6</sup> Suffolk County Council, 2005

<sup>7</sup> Suffolk County Council mid year population estimates, 2009

<sup>8</sup> Suffolk County Council mid year population estimates, 2009 (based on EERA, 2006)

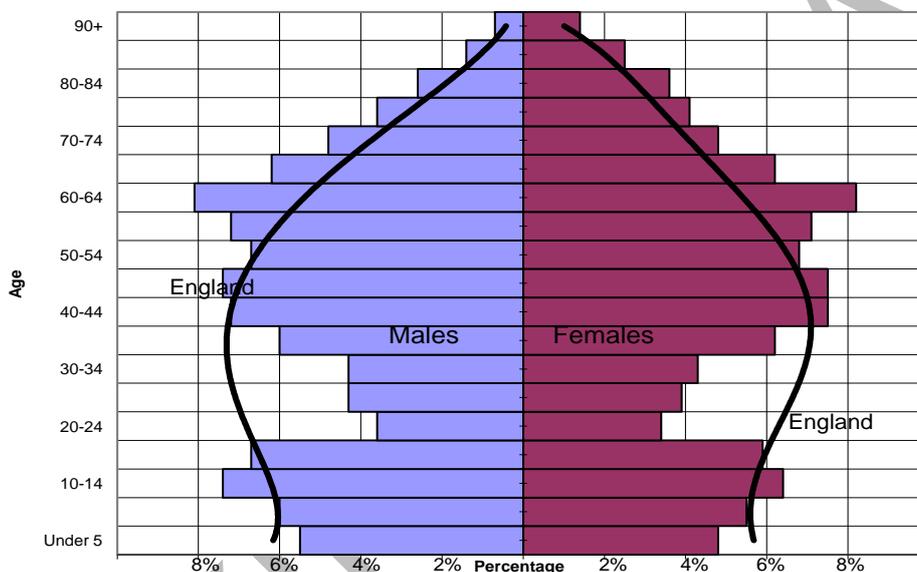
**Map 3: Demographic and Social Characteristics**

WORKING DRAFT

A more notable trend is the rate at which the population in the district is ageing, with 19% of the total population older than 65 years in 2001. It is predicted that this figure will increase to 29% of the total population by 2021<sup>9</sup>, and the age pyramid in Fig 2 (below) illustrates this.

**Figure 2: SCC age pyramid graph Babergh 2009**

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Babergh district, of which only 20 had a population of over 1000 people in 2009<sup>10</sup>. In 2009 only a small proportion of the 76 parishes had access to most of the key services and facilities to meet their day-to-day needs. These parishes are fairly evenly distributed throughout the district<sup>11</sup>. Local facilities such as shops and post offices are under threat in a number of areas, and villages are under pressure to maintain their viability.

#### 1.4.6 Key Social Issues

- Affordability of housing - 2008 figures show that the average house price is almost 10 times higher than the average wage in the area. Babergh is the second least affordable district in the County. Although this average is dropping at present, in real terms many people would still find buying a house unaffordable<sup>12</sup>.
- Need to plan for the growing number of elderly and very elderly people - local health and other services will be placed under pressure. It will be important to ensure that the needs of the elderly population are addressed.

<sup>9</sup> Housing Needs Survey, 2008 and Suffolk County Council, 2009

<sup>10</sup> Suffolk County Council mid year population estimates, 2009

<sup>11</sup> Babergh District Council, 2009

<sup>12</sup> Suffolk County Council, 2009 (Suffolk Observatory 2008 Q3 House price to Income ratios)

- Babergh is the second least deprived district in the County (Index of Multiple Deprivation updated 2010). This is relative, and there are pockets of deprivation present around Sudbury / Great Cornard. Some of the rural areas of Babergh are particularly deprived in terms of access to housing and other services<sup>13</sup>.
- Whilst the incidence of crime is low across the district generally, there are specific locations within town centres and areas of relative deprivation where the incidence of crime is relatively high, and growing. More generally, crime and disorder is still an important issue for many local people, and fear of crime is disproportionate to the levels of crime in the area<sup>14</sup>.

## 1.5 People and Places in Babergh

Facts and statistics only paint a faint outline of what it is like to live or work in Babergh. The people who know Babergh best are the people that live or work in the district. We engaged town and parish council representatives in a series of workshops during October 2010, and asked them to complete a focussed questionnaire to tell us the good and bad points about living in Babergh, and to hear their views, aspirations and ideas for coping with change and managing growth in the district. Details of the feedback from these workshops are included in the Spatial Strategy technical background document. The outcome of the workshops and responses to the questionnaire gave a comprehensive picture that, together with the wider consultation responses have been used to inform the spatial strategy and policies in this document.

### 1.5.1 What is Babergh like now? What makes it that way?

The feedback from the workshops and parish council questionnaire was very positive. People have a clear sense of place and community. The rural nature of the district is important to the people that live and work here, and this provides the background and context for many small village communities. These smaller communities usually have limited services and facilities, and depend on the larger villages and towns in the district to provide for many of their day-to-day needs. The important role of larger villages is recognised and it will be important to safeguard services and facilities in all communities.

Growth and 21<sup>st</sup> century living have changed Babergh, and the towns, villages and countryside look very different from how they would have looked a hundred years ago. The processing of agricultural produce can mean a factory in the countryside, whilst at the other end of the scale people work from their homes where broadband is available. Growth in jobs and homes can be seen in Sudbury and Great Cornard. The local economy supports a diversity of businesses from traditional silk weaving to high tech manufacturing. The local economy in many villages is boosted by providing goods and services to visitors, be it day visitors shopping, visiting cultural and historic features and eating out, or longer-stay tourists in hotels, bed & breakfast or self catering accommodation.

Brantham has experienced a different type of change in the latter part of the twentieth century similar to that in towns and villages around the country where modern processes, innovation or lifestyle changes have led to the demise of the original manufacturing industry that would have been the only or major employer of people in the local community. The needs of Brantham are different from the needs of Sudbury / Great Cornard or of small rural communities, and this plan provides a framework for growth for all of Babergh for twenty years. This means planning for continuous change that recognises the differing needs of people who live and work in the district. Competing interests need to be balanced, so that the character and qualities of Babergh can be conserved.

<sup>13</sup> Index of Multiple Deprivation, 2010

<sup>14</sup> Suffolk Observatory, 2008 and ONS Annual Population Survey

### 1.5.2 Key Issues for Growth and Change

To ensure that growth is both managed and delivered appropriately and is thus proportionate and sustainable, the following are key issues that will guide development:

- The shape, history and character of communities - the individual capacity of communities to accommodate growth, the need to ensure the local economy remains healthy, grows, creates new jobs, and provides for local need with a range of housing for all.
- Meeting identified development needs (in the face of various delivery issues), including: adequate provision for a stronger economy and more jobs; housing provision of the kind needed, (including affordable housing in particular); other development including infrastructure of all types.
- The very limited supply of brownfield land for re-development within the district – the general objective of prioritising brownfield land for new development has caused some problematic issues in the Babergh district in the past, as it has led to significant pressure to redevelop the district's scarce employment land supply for residential development instead. The re-use of brownfield land has to be carefully considered to ensure: that the proposed new use is appropriate for the land concerned; that development for the district is sustainable in all important respects; and achieves an appropriate balance between social, economic and environmental objectives.
- Appropriate infrastructure to ensure that our communities are sustainable and healthy - it is important that infrastructure needs are considered together with how new development will be accommodated in the district.
- Reduction in car travel and more sustainable transport use - for many people in small villages / countryside public transport will not replace the need for a private car. We can reduce the need to travel by ensuring new development is located close to services and facilities and that these developments are carefully planned to provide opportunities for work and leisure etc. close to new homes.

### 1.6 Vision, Objectives and Strategy: Summary of Proposed Approach

Traditionally, Babergh has not been a high growth area. This is partly a result of its settlement pattern and predominantly rural character, a number of development constraints and its sub-regional location, with larger urban centres nearby, particularly Ipswich, Colchester and Bury St Edmunds. The predominant and traditional culture of the district may also have been influential here. However, the planning for economic development approach adopted for Babergh over the last decade could be regarded as positive and proactive.

However, at present we face a major economic recession, a severely depressed housing market and unprecedented (public sector) resource constraints. In some respects, the signs are that the Babergh area has weathered the recession better than many other localities. These factors indicate a need to respond effectively and to make a change in direction by adapting our approach.

The preferred Babergh approach for this Plan period is to facilitate and plan for managed growth, through an economic growth / jobs-led strategy. As a result, a significant degree of economic growth is being proposed. This is partly in recognition of Babergh's wider context and its opportunities to promote economic prosperity and new job creation. We propose a positive, measured approach that helps to create renewed confidence. Our contribution can only be primarily local in nature but it is aimed towards helping promote national economic recovery. We will adopt a realistic approach and recognise that achieving this

target will be challenging. In consequence, an economic strategy has been prepared to explain and support the Core Strategy and Policies document and to set out the means by which it is to be realised. That supporting strategy also explains in more detail why Babergh is pursuing an ambitious, high economic growth approach.

The sub-regional context is an important factor in this approach and the relationship with both other local authorities in the wider Ipswich area and in north Essex has been instrumental in shaping its approach. However, the success in delivering housing delivery targets over the Haven Gateway (HG) area has not been matched by similar success in jobs growth, leading to an imbalance. With an opportunity to achieve high economic / jobs growth for Babergh identifiable, the Council believes it will be in the best interests of Babergh and the wider HG area to help alleviate that mismatch. Some other HG districts may not have a similar opportunity. Co-operation with these local authorities and other organisations, particularly the Haven Gateway Partnership (HGP), is therefore a key element of the proposed approach. The Council does not believe that there are compelling reasons to stifle or impede economic growth in its area overall. In very simple terms, we wish to make it clear that Babergh is 'open for business'.

The level of new housing growth proposed is less ambitious and has been planned to reflect local views, aspirations and priorities and to reflect the local context, with high levels of recent housing growth nearby in Ipswich and relatively high levels anticipated to remain there for the future. Again, this reflects the importance attached to the proposed cross-boundary and co-ordinated approach proposed for Babergh. Instead, Babergh's preferred approach is that its housing provision should be much less focused on simple numerical levels or traditional targets than on providing the *right kind* of housing in relation to identified local needs (including market and affordable housing) where it is needed, at the right time and with an emphasis on affordability, quality of design and sustainability.

The third key element is that of infrastructure delivery, which includes physical, green and social / community infrastructure. The Local Plan is being prepared with a particular emphasis and strategy aimed at ensuring satisfactory delivery of these, although we recognise fully the extent of the challenge involved in this. Hence the preparation of an infrastructure delivery programme in tandem and our work towards putting a Community Infrastructure Levy (CIL) in place (this being approached jointly with our various partner local authorities). We wish to prepare this first part of the new Local Plan, the Core Strategy and Policies through consensus but also in a timely way. This is in recognition of the need to create the right conditions for growth. Thus, once we can agree a clear and coherent development strategy for the district, this will facilitate the planning and delivery of the infrastructure needed. Indeed, the latter cannot be achieved properly without the former in place. In these ways and others, we consider it critical to provide the benefits of certainty and confidence for both private and public sectors, and accordingly for this to allow investment to take place.

Beyond the achievement of these critical delivery areas, the Core Strategy and Policies aim to promote flexibility and adaptability of approach. At the same time our approach aims to allow for as much flexibility as possible in how the delivery of these growth elements is to be achieved.

### **Spatial Vision:**

**Babergh will continue to be an attractive, high quality place in which to live and work, and to visit. The local character and distinctiveness of South Suffolk will be further enhanced by a strong economy and healthier environment providing the framework for a well connected network of places that is made up of mixed and balanced communities.**

## **1.7 Objectives for Shaping Babergh's Future:**

### **Objective 1: Enable – mixed and balanced communities / comprehensive neighbourhoods**

Critical success factors:

- Delivery of approximately 10,000 new jobs and 2,500 new homes by 2031 throughout the district supporting urban and rural areas and meeting the needs of businesses and communities
- Delivery of a mix of housing types which matches the identified need in each location

**Policies CS1, CS2, CS11, CS14, CS15, CS16, CS17 and CS18**

### **Objective 2: Support economic growth and prosperity, building on the strengths of the local economy, including strengthening the role of the rural economy**

Critical success factors:

- Delivery of well planned strategic mixed use schemes in Sudbury / Great Cornard, Hadleigh, and Ipswich Fringe
- Facilitating the right conditions to foster economic growth
- Protection of existing employment sites and premises
- Development of strategic and locally important sites implemented during the plan period
- Maintain and enhance job opportunities in the rural communities to support mixed and balanced communities

**Policies, CS2, CS3, CS3a, CS4, CS5, CS5a, CS5b, CS6, CS6a, CS11 and CS13**

### **Objective 3: Facilitate – regeneration and renewal**

Critical success factors:

- Delivery of a mixed use scheme on the redundant industrial land at Brantham (Policy EM06 of the Adopted Local Plan) through a planned scheme which is well integrated into the existing village
- Redevelopment of the former sugar factory site at Sproughton as a sub-regionally strategic site for port-related and other employment uses
- Town centre regeneration, particularly to extend or enhance the retail offer, complementary to the existing vitality and viability of the towns of Sudbury and Hadleigh

**Policies CS1, CS2, CS5a, CS6a and CS11,**

### **Objective 4: Ensure provision of adequate infrastructure to support new development**

Critical success factors:

- The use of a master planning approach to ensure the co-ordination and phased delivery of required infrastructure is planned for in schemes on the larger and strategic sites from the outset
- The establishment of a 'CIL' for the Authority
- Securing contributions either on site, or through financial contributions for the necessary infrastructure to support the new development, as required, site by site

**Policies- CS3, CS3a, CS4, CS5, CS5a, CS5b, CS6a, CS10, CS15, CS16, CS17 and CS18**

## **Objective 5: Encourage / Promote – adaptation to climate change, resource efficient use of land and infrastructure**

Critical success factors:

- Evidence of schemes which meet the target reduction in CO2 emissions
- Brownfield sites developed for appropriate uses, in preference to green field, resulting in a significant amount of development coming forward on brownfield land
- The number of schemes which demonstrate the use of on-site renewables and energy saving initiatives, plus renewable energy generation
- No deterioration in water quality as a result of development coming forward in the plan period.
- The number of schemes implemented that demonstrate the use of innovative and/or resource-saving measures such as Sustainable Drainage Systems (SUDs) and waste management measures

**Policies- CS7, CS8, CS9 and CS10**

## **Objective 6: Protect / conserve and enhance: local character; built, natural and historic environment including archaeology, biodiversity, landscape, townscape; shape & scale of communities; the quality and character of the countryside; and treasured views of the district**

Critical success factors:

- Strategic sites and other large scale development are well located and designed in relation to the protected areas and most sensitive landscapes
- The character and context of the landscape/townscape inspires and informs the structure, design and shape of all new, large-scale development. Although the focus will be different for each site important elements are likely to include: landscape form, biodiversity, a design framework based on green infrastructure, and connectivity
- Enhancement **and** mitigation **and compensation** is provided where appropriate
- The scale and character of new development is appropriate to and well integrated into the settlement;
- Development is of a high quality and is of a design which respects the local environment in which it is located, particularly the historic context and character

**Policies- CS3, CS3a, CS4, CS5, CS5a, CS5b, CS6, CS6a, CS7, CS10 and CS11**

## **Objective 7: Support Rural Communities, local services and facilities**

Critical Success factors

- Key services are retained or improved
- Rural services are supported in a way which matches the identified need

**Policies- CS1, CS2, CS6, CS13, CS16 and CS17**

## **Objective 8: Manage and deliver development in a phased way so that growth is incremental and delivered at the appropriate time**

Critical success factors:

- Development within the Strategic sites is phased over the plan period, as outlined in a master plan or other relevant planning delivery framework
- In Sudbury / Great Cornard phasing ensures that development in the Chilton Mixed Use scheme comes forward in the early part of the plan period, and if Chilton is delayed, allows for the New Direction of Growth to be implemented sooner

- Development in other locations respects the cumulative scale of development elsewhere in the settlement and within the functional cluster

### **Policies- CS2, CS3, CS3a, CS4, CS5, CS6, CS17 and CS18**

The achievement of these objectives needs to be set within the context of the National Planning Policy Framework (NPPF) and the new Presumption in favour of Sustainable Development. The following over-arching policy applies this in the local context in line with prevailing national policy requirements.

#### **Policy CS0: Applying the Presumption in favour of Sustainable Development in Babergh**

**When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in Babergh district.**

**Planning applications that are supported by appropriate / proportionate evidence and accord with the policies in the new Babergh Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.**

**Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:**

- **any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or**
- **specific policies in that Framework indicate that development should be restricted**

Note: The role and importance of evidence in planning matters is dealt with at section 3.6.1

## Section 2 – Strategy for Growth

### 2.1 Settlement Pattern

#### 2.1.1 Towns and Villages in Babergh

The Babergh District is a predominantly rural area with a distinctive settlement pattern, containing just two towns and a small part of the urban area of Ipswich. The largest of Babergh's towns is Sudbury / Great Cornard, situated in the west of the district. The local 'building blocks' that define the separate identities of local communities in Babergh are the individual parishes (with Babergh containing 76 of these). As a rural district, the many small villages depend on the larger settlements and town centres for many of their needs. In this context the role provided by the major centres beyond the district is recognised, with the north of the district looking to Bury St Edmunds and Stowmarket; eastern parts and the Shotley peninsula to Ipswich and the south of the district to Colchester.

The settlement pattern is influenced by the way in which places relate to each other and the natural day to day connections which are made between settlements because of the geography of an area. In considering the settlement pattern in Babergh, it is helpful to set the context for this, and understand how the suggested pattern has evolved in the preparation of this Core Strategy and Policies document.

The 2001 Suffolk Structure Plan and 2008 Regional Spatial Strategy (the East of England Plan) both contained policies for identifying settlement hierarchies. This was based on criteria linked to the size of settlements and the number of key services within them. In 2011 in Babergh district we have found that the context has changed since the 2001 Suffolk Structure Plan settlement hierarchy policy was developed. Some villages may have lost their convenience goods shop (and/or post office) and/or their pub. We also considered the more recent, emerging Regional Spatial Strategy, and felt that this set too high a benchmark for key service centres in this part of rural Suffolk, for example employment opportunities in villages in Babergh district are limited, and most have only one or two shops and services rather than a range, and public transport to higher order settlements can scarcely be described as "frequent". As well as this, feedback from the "Growth Issues and Scenarios" consultation has informed the approach to a hierarchy of settlements in the rural areas and the 'key service centre' concept (which itself is not new). We have therefore taken a fresh look at this and have sought the views of town and parish councils to establish how Babergh's settlement pattern actually works on the ground.

In order to draw out and understand local knowledge better, a mapping exercise that was carried out in the autumn of 2010 demonstrates the importance of Sudbury/ Great Cornard, Hadleigh and Ipswich for employment, shopping and services. However, this exercise focussed on the settlements in the rural area, and the results demonstrate the important role that some larger villages in the district have in supporting the rural hinterland beyond, including many smaller villages, particularly on the Shotley Peninsula and the north west and north east of the district. The map in Appendix 4 is a "snapshot in time" showing the results of this exercise and more details to the background of this are available in the Spatial Strategy Background Document.

Although not particularly large places themselves, many of the larger villages support a number of services that are primarily sustained by the population of the village and a number of smaller villages and communities in the surrounding area (plus visitors). That is, the smaller villages and communities form the catchment area for the services and facilities available at the larger villages. Another way to describe this would be to consider each of the larger villages to have a hinterland of smaller villages and communities. In effect, these larger villages form the centre or core of a 'functional cluster' of smaller settlements. In some cases the clusters are geographically distinct, in other cases there is a degree of

overlap between the hinterland of core villages, particularly where they are relatively close to each other or are served by the same major road.

Town and parish councils have provided evidence of this functional clustering of smaller communities around towns and the larger villages that provide most of the day-to-day needs of rural residents, e.g. primary school, doctors, and convenience grocery shop. The majority of villages in the autumn of 2010 still had access to a rural bus service (although service frequencies vary greatly), although it is acknowledged that some rural services have been or are being withdrawn since then.

This 'functional cluster' approach moves away from the key settlement concept, in that the role of a settlement is not defined by its size, or the number of services it hosts, but more by the extent to which communities look to settlements on a daily basis. This significantly reflects the geographical location of the settlements and which other towns or villages are located nearby. The evidence shows that in the more remote rural locations some smaller villages have a critical role to play in serving the communities of the rural hinterland beyond. The same village, located closer to an urban area, would be likely to have a far less important function for the surrounding rural communities.

The information provided by the mapping exercise (from the parish and town councils) demonstrates this concept and the extent to which it informs the settlement pattern of the district is described below. Although the Core Strategy and Policies document is for the Babergh area, the functional clusters of settlements do not equate to administrative boundaries. Information has therefore been sought from all of the Parish Councils of the settlements adjoining the Babergh District Boundary, and where it has been provided this has informed the cluster groups where relevant. The settlement clusters identified are described below and are shown on Map 4. This also illustrates the extent of the connections between rural settlements and their function within the wider community beyond.

### **2.1.2 Functional Clusters (or 'Catchments') centred on Urban Areas**

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 4.

These main urban areas and market towns 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.

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.

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.

### **2.1.3 Core Villages**

Outside the urban areas of Sudbury/ Great Cornard, Hadleigh and the Ipswich Fringe 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 settlements identified as Core Villages have been defined as such not because of size or potential opportunities for growth, but because of the role they play providing 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. 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.

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.)

### **2.1.4 Hinterland Villages**

A total of 43 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. 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.

A few of these villages are larger settlements and were previously identified as Sustainable Villages and then as Key Service Centres (Growth Options and Scenarios consultation), for example, Shotley, Acton and Great Waldingfield. In the case of the latter two, it is their proximity to larger service centres, namely Sudbury / Great Cornard and Long Melford, which influences the role they play in serving the wider rural communities. In the case of Shotley, this reflects its location at the end of a peninsula such that it has a very restricted hinterland area. These larger settlements, together with the smaller Hinterland Villages, do have a role as villages (and as service centres) in their own right, as well as providing some support for the rural areas beyond, but to a lesser extent than the Core Villages. This

illustrates the approach towards the rural areas, being reflected by the function of settlements, rather than size or number of services, which relates more to how people actually live in these areas and more accurately reflects the sustainable nature of the Core Villages. In other words, a larger village with relatively few services for the size of the population (e.g. Brantham) will be less sustainable than a village with a smaller population and a relatively good range of services (including Doctors surgery, more than one shop, and pubs and other community assets) e.g. Bildeston. Making the larger villages Core Villages based on size will not make them more sustainable. The designation as a Core Village will not automatically confer a certain level of development – this will depend on the size, character, location, proximity to towns and other Core Villages, and the role it plays within its hinterland.

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Brantham is identified as a Hinterland Village as this reflects its current function, key service provision (convenience shop, primary school and access to public transport) and relationship with other surrounding settlements. Policy CS6a allocates a major regeneration site which, when delivered, may influence the role of Brantham, the key services available and the extent to which it may increasingly function as a hub for surrounding settlements in the future. Evidence of changes in the role of function of Brantham or other settlements will be reflected in monitoring and review and if appropriate may be defined as a Core Village in the future.

There are more remote settlements in the countryside beyond the Hinterland Villages, and in some cases residents of these hamlets and rural settlements will look to the Hinterland Villages for some of their needs, as well as to the Core Villages and urban areas. Again, this tends to happen in clusters and the pattern is reflected in the functional clusters identified on Map 4.

**Map 4: Functional Clusters in Babergh**

WORKING DRAFT

## 2.1.5 Countryside

As a rural district much of the area comprises countryside. Everywhere beyond the built up areas of the urban / regeneration areas and Core and Hinterland Villages, defined by settlement development boundaries, is treated as open countryside. This includes the smaller rural villages, some small clusters of houses located remotely from village centres and a few very small rural hamlets. Some, but by no means all of the small rural villages are shown within the Functional Clusters on Map 4 as this map reflects the outcome of the consultation exercises, survey and parish councils' workshops held in 2010.

The countryside still hosts some traditional activities which, by their very nature need to be located there. Although, there has been a need for diversification, agriculture, still makes up a very large part of our countryside between the villages, certainly in terms of land use.

## 2.1.6 Special Areas / Regeneration

### Brantham

It was proposed in the Growth Issues and Scenarios document (2010) that Brantham should be identified as a Key Service Centre. However, feedback from the 2010 workshops and mapping exercise has resulted in Brantham being excluded from the list of Core Villages. There are two reasons for this: firstly, Brantham is very close to the services, facilities, employment and transport opportunities in Manningtree; and the second reason relates to the historical relationship between the village and the substantial nearby industrial site (at Cattawade). Brantham is distinct and different from other villages in the district because of its unique history of dependence on one employer, and then, more recently, one employment site.

There is a major outstanding land allocation in the adopted Local Plan which relates to the major industrial site at Cattawade (Brantham). 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 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 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.

## 2.2 Growth – How Much, and Where Will it Go?

### 2.2.1 Background and Context for Growth in Babergh

Growth and further development within the district is a “given” requirement for the future. Key issues to address are the scale of this growth and where it should be located. This applies equally to housing and economic growth, both of which need to be balanced to ensure growth is sustainable. It is also essential to ensure infrastructure is provided and maintained at a level adequate for the level of growth.

Guidance is provided to steer our strategy for growth for the district through the National Planning Policy Framework (March 2012), and prior to that through national guidance notes and statements. ~~The adopted RSS set targets for new homes and jobs for each council area, and whilst the regional strategic level of policy is likely to be revoked~~

~~the sub-regional context for Babergh remains an important consideration.~~ Babergh works with its neighbours in the Haven Gateway area across the county boundaries of Essex and Suffolk, and with neighbouring authorities in the Ipswich Policy Area.

The Government announcement regarding proposed abolition of the RSS, the East of England Plan, provided the Council with an opportunity to consider growth needs from the “bottom up”, and consider the existing pattern of development, past rates and amount of growth, Local Plan allocations that have not yet been developed and outstanding planning permissions, the capacity of settlements to accommodate growth, and local needs and aspirations.

## **2.2.2 Level of Growth and Distribution**

Responses to the Issues and Options report in 2009 indicated minimal support for a new settlement and ‘equitable dispersion of growth’ in the district. Other issues raised included the view that key service centres should be identified; support for some development within and around sustainable villages; impacts of the spatial strategy on the surrounding area and on the historic and natural environment should be considered; impacts on climate change should steer development; and brownfield land should be used first.

Using this as a starting point, and considering responses to the Summer 2010 Growth Issues & Scenarios consultation and the work with town and parish council representatives at workshops and through questionnaires, we have considered the distribution of development within the context of the Babergh settlement pattern described above.

If the amount of growth planned for Babergh was to be divided equally across all towns and villages in the district over the plan period many small settlements would be overwhelmed putting pressure on the infrastructure, services and facilities. This would lead to an increase in commuting by car and other vehicle movements, and would stretch service provision (schools, health etc) at a time when services are being cut back. Not only would this be unsustainable, but it would also be contrary to the views and aspirations of the majority of communities in the district. The preferred approach is to plan for growth to be distributed to the towns with some town-edge / urban expansion in Sudbury, Hadleigh and the Ipswich Fringe and to Core and Hinterland Villages at a scale appropriate to the locality.

Delivery of a realistic scale of district-wide housing and economic growth to meet the needs of Babergh within the framework of the existing settlement pattern means that there is a need for ‘urban (edge) extensions’ as well as locally appropriate levels of growth in the villages. We know that there is insufficient land available within the existing town boundaries and there is considerable pressure on the limited brownfield land that there is in the district.

The positive advantages of having properly planned, comprehensive, mixed-use developments in the towns/urban fringe is that there is access to jobs, services and facilities, etc. The most important consideration when planning growth of the towns is the provision or improvement of the necessary infrastructure to ensure that proposed development does not impose a burden on the existing community.

## **2.2.3 From Broad Locations to Strategic Land Allocations**

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 three Strategic Allocations and one Broad Location. The Key Diagram shows 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).

Consideration of the nine Broad Locations from the Growth Issues and Scenarios stage of the process, the sustainability appraisal, other data and information that was gathered to consider their qualities and constraints, and the selection process is available in the Spatial Strategy Background Document.

The New Directions of Growth, the edge of town / urban extensions, have been selected as locations that can be aligned with the capacity of existing infrastructure, or can be planned at a scale that is sufficiently viable to include new or improved infrastructure, and planned to include employment land, green infrastructure, and access to services including transport. Distribution of allocated growth and development is therefore to be shared predominantly between the town centres / urban edges, and the Core and Hinterland Villages.

*The amount of housing growth and employment land to be accommodated in Core and Hinterland Villages will depend on their individual capacity to accommodate growth, the scale and character, role and function of the settlement and the views of the local community. It is not appropriate to identify allocation sites or broad locations for potential growth in the villages at this stage, and allocations will be made, if appropriate, in the Site Allocations DPD.*

## 2.3 Level of Economic Growth

~~The adopted RSS (2008) set out in Policy E1 an indicative job growth target of 30,000 jobs for the Suffolk Haven Gateway (defined as Ipswich, Suffolk Coastal and Babergh). This was not apportioned between the districts, so it was for these local authorities to determine an appropriate distribution between them. Whilst having regard to job creation plans and aspirations for our neighbour authorities, we also consider that circumstances have moved on since then. The targets for new jobs set out on a district by district basis in the draft review of the RSS (to 2031) are a little different in nature from the RSS housing growth targets. The indicative jobs target figures in particular were developed by councils Babergh has been working together with neighbours neighbouring – in this area the Suffolk Haven Gateway / Ipswich Policy Area authorities – to provide a realistic “bottom up” estimate of indicative jobs target figures based on need / capacity and the local economic context. Accordingly, and whilst the Government has indicated that RSSs will be revoked, it It is important to note that the proposed indicative jobs growth target figure of the emerging RSS (9,700 for Babergh with includes an apportionment allowance for new jobs on land within Babergh to be included within a jobs growth target for the Ipswich Policy Area. to be determined by the IPA authorities) is considered to be founded on reliable evidence and that that evidence remains a material factor in determining an appropriate indicative jobs target figure for Babergh.~~

Assessing a realistic jobs growth target has also been considered from other approaches. ~~One of these considered compensating for a predicted shortfall in meeting the adopted RSS target of 30,000. This used the forecast figure for Babergh of 8,100 jobs and added one-third of the residual Suffolk Haven Gateway target figure (i.e. one-third of 7,140, assuming a three-way split between Babergh, Ipswich and Suffolk Coastal). This gives a figure of 10,480 new jobs. However, it was felt that this was overly optimistic, particularly given the loss of public sector jobs, and was only~~

~~based on projecting target figures forward. Another calculation~~ One approach was based on the forecast figure of 8,100 new jobs forecast in the former Regional Strategy (RS) (abolished January 2013) applied where the same percentage growth in new houses used in the former RS, i.e. 20% was applied to the jobs target for the district to 2031. as had been used in the adopted RSS for the growth in new houses, i.e. 20%. This gave a figure of 9,720 new jobs.

In terms of assessing a jobs growth target for Babergh's Local Plan the locally derived indicative figure of approximately 9,700 is felt to be appropriate.

The jobs growth target is only one element of an economic strategy for the district. This is set out in a separate document, but in summary, Babergh's economic strategy is based around the following main areas:

- The new employment areas planned as part of the mixed use allocations in the New Directions of Growth;
- Regular review of employment land and, where appropriate, policies to protect existing employment sites;
- Working with partners to identify strategic employment areas (e.g. A14 / Suffolk Haven Gateway);
- Recognition of, and support for, our local strengths, particularly in non-B Use Class employment such as tourism, retail and other service sector businesses; and
- A locally oriented, positive approach towards promoting the rural economy, jobs in rural areas and accordingly the overall vitality of Babergh's considerable rural areas

This strategy will ensure sufficient land is allocated and policies are in place to:

- meet the need for economic growth and new jobs in the district,
- for existing local businesses to thrive and grow, and
- create a supportive environment for new businesses to invest in the area.

A detailed economic strategy document has been prepared to support this Core Strategy and Policies document. As a supportive piece of work, this is best kept as a background explanatory document, rather than including its content here and thereby adding to the volume of this draft document.

## 2.4 Level of Housing Growth

Based on the principles and distribution set out above, and considering capacity factors, historic growth rates and existing commitments, it is considered that 'new' growth of 2,500 dwellings would be appropriate in the district over the next twenty years. The Housing Background Document and Housing Implementation Strategy provide more detail on the background to the level of growth. In addition to these 'new allocations' we have a good level of future housing supply or existing commitments in the district from planning permissions, Local Plan Allocations and sites where the principle of development has been established. These commitments are likely to provide for 2430 new dwellings in the district as shown in the table below. Looking at past trends it is clear that windfall figures have made up a significant proportion of the housing completions each year in the district (the Housing Background Document and Housing Implementation Strategy will provide more on this). Based on past trends a conservative allowance is therefore made for a windfall figure of 1640 for the plan period, although the figure allowed for is much lower than the average windfall figures over the last ten years. The 'new' growth figures, existing commitments and windfall figures minus a 10% buffer for non-delivery would provide for an average annual build rate of 300 per annum as shown in the table below.

Plan period 2011 - 2031	Explanation of figures
2,500	Capacity for additional 'new' growth to allocate – bottom up approach
2,430 (Note 1)	Completions for 2011-12 and existing commitments (= remaining Local Plan allocations and outstanding planning permissions)
1640	Allowances for windfalls (annual rate of 82 over 20 years)
6570	Total 'new' capacity for growth and existing commitments
5,975	Housing to provide for in District between 2011-2031
595	10% buffer to allow for non-delivery
300	Future annual average growth rate = Total housing to provide for divided by 20 years

Note 1: this figure represents total anticipated housing supply, not all of which is likely to be deliverable within the first 5 (or 6) years and accordingly represents a figure in excess of the identified 5 (or 6) year housing land supply

Over the past ten years, for the period of 2001 to 2011, relying on data collected in the latest Annual Monitoring Report of 2010-11, a net total of 2,609 additional new dwellings were completed in Babergh. This equates to an average annual build rate of approximately 260 new dwellings per annum. It has to be mentioned that build rates have dropped significantly over the past two years and the average annual build rate between 2001 and 2008 in the district was approximately 280 new dwellings per annum. It can be seen that the future annual average growth rate would allow for some increase in housing in the district but at the same time would not be disproportionate to existing average annual build rates.

The proposed annual extra homes provision figure is considered to be the maximum realistic and deliverable contribution to homes growth and new affordable homes that is compatible with Babergh's housing markets and capacity for growth. Growth levels beyond this figure, up to the full, theoretical new homes requirement, are considered likely to conflict with the sustainable development requirements set out in this Plan. In this way, the proposed level is considered to represent the most appropriate balance that reflects Babergh's approach to sustainable development, meeting the 3 elements of social, environmental and economic sustainability objectives.

## 2.5 Relationship of Jobs Growth to Housing Growth

The basis for arriving at Babergh's respective figures has been set out in summary form in preceding text. Both employ and balance a range of evidence and considerations. Some of that evidence came from that used to inform the emerging RSS review (to 2031) and some from more local sources (such as the recent Suffolk Haven Gateway Employment Land Review (ELR) study). These sources were not mutually exclusive. We have also listened to the views of consultees during the recent Growth review (and Scenarios) exercise and this forms part of the overall evidence base.

For Babergh district it would be difficult in practice to achieve a precise or very close geographical relationship between provision of new jobs and homes 'across the board', as may be easier within urban districts / areas. This is partly because of the need to sustain and revitalise the rural areas, as well as the urban areas, in a large mainly rural district (with

a dispersed settlement and population pattern) of some 230 square miles. Babergh has a vibrant rural economy, with a surprising range of economic activity, and we believe it of great importance to sustain and promote this. It is one of the locally distinctive characteristics and strengths of the district.

Given Babergh's inevitable strong connections with surrounding areas (bordering 6 other large district areas), achieving an objective of 'self-containment' for live-work patterns is considered unrealistic, whether desirable or not. At the same time, in terms of sustainable travel patterns and quality of life, our 43% out-commuting (and a similar level of in-commuting) is disadvantageous. However, the proposed high jobs growth target is planned partly to help promote the best opportunities for Babergh residents to have choices to live and work locally (although typical travel to work distances must be expected to be generally higher than those for urban based residents). The emphasis on protecting and providing new rural facilities and services also supports our aims to allow for these choices. It must also be recognised that such opportunities can only be encouraged and many will choose not to do so for a wide range of possible reasons.

In terms of new planned strategic growth, both the already planned and proposed additional mixed and balanced communities for the urban edge extensions (for each urban area) have been conceived to provide for as close a geographical relationship between housing and jobs as possible. These will deliver just under 60% of the planned additional housing, although we cannot be as precise at this point about job provision for these locations until further planning and design work is progressed. Accordingly, it is considered that an appropriate balance has been struck between our aim to promote the rural economy and new strategic urban growth areas.

Further explanation of this relationship and the considerations involved will be provided in the Spatial Strategy Background Document.

## **2.6 Cross Boundary Connections and Joint Working (Duty to Co-operate)**

The Babergh context and geography has been described but further detail is necessary to describe cross boundary matters and accordingly joint working commitments / arrangements. The requirement to do this is the new 'Duty to Co-operate' within the Localism Act 2011. In the absence of formal strategic planning arrangements, the need for co-ordinated, strategic planning is still recognised to be of great importance. Babergh is closely linked with 3 large Essex districts, 2 large Suffolk districts and Ipswich. This means that a number of different geographical 'alliances' and arrangements have been put in place over a period of time and these are described below.

### **2.6.1 Babergh - Mid Suffolk**

Although the results of a major public exercise and referendum in Spring in 2011 did not support the full and formal merger to form a single district council, the 2 Councils are integrating to form a single staff structure in 2012, (see website of either council).

During 2010 and 2011 informal but close working arrangements developed around integration of teams, work programmes and planning activity overall. Whilst it is considered too early to integrate towards a single Local Plan at present, collaborative working has proved beneficial in respect of both this Core Strategy and Policies document (BDC's top planning priority) and the Stowmarket Area Action Plan (MSDC's top planning priority). Further, the 2 Planning Policy teams commenced initial work on a joint Development Management Policies document in April 2011.

Co-ordination of planning activity for the Ipswich Policy Area (IPA) (particularly localities around west / north-west Ipswich) has been in place for a number of years and led mainly by the IPA members and officers groups, plus work on the Haven Gateway Integrated Development Programme.

### **2.6.2 The four Ipswich Policy Area (IPA) Local Authorities (including Suffolk County Council) / Suffolk Haven Gateway**

The IPA as an explicit entity was identified and formalised long ago in various versions of the Suffolk Structure Plan (including the most recent Plan adopted in 2001). This included a planned and co-ordinated approach to housing provision in recognition that the borough boundary is tightly defined and that housing provision in the IPA, outside the borough itself, effectively serves and relates closely to the borough. The Babergh Local Plan, alteration No.2 2006 was prepared in the context of the Suffolk Structure Plan and implemented its strategy (including the strategic approach to housing in the IPA), planning policies and proposals at a local level. The IPA approach was also identified and continued in the adopted RSS of 2008, again requiring co-ordinated housing provision and in addition, co-ordinated new jobs provision. The above-mentioned groupings from each constituent local authority and Haven Gateway Partnership led groupings have been used for co-ordination of growth targets and delivery.

The Council recognises the importance of the Ipswich Fringe in respect of its value for employment development and commercial activity. The location has a number of important inherent advantages offering opportunities to both local authority areas. These cross-boundary considerations have helped shape the approach being proposed. It is recognised that:

- Jobs in the area will be available and of benefit to residents of both districts;
- Such jobs will play an important part in promoting the economy of Ipswich itself and the wider area, also in ensuring the sustainability of Ipswich's future development plans;
- That new housing provided here will function similarly, also helping to meet needs or demands arising in the borough itself

Experience shows that it has not proved necessary for these local authorities to submit formal representations or objections to each others' Local Plans (with rare exceptions). Officer meetings on cross-boundary matters have been ongoing as required. In preparation for Ipswich's Core Strategy examination Babergh provided ongoing support for Ipswich's position as required. This included a Chief Executives' statement confirming and describing joint working practice and expressing mutual commitment to it (May 2011). LDF/Local Plan evidence work in respect of key policy areas (including SHLAA, SHMA, affordable housing viability, employment land review) has been carried out jointly for the whole districts of the IPA reflecting its close ties.

### **2.6.3 Suffolk Local Authorities**

Long established groupings of senior officers have worked together closely for a considerable length of time (including Planning Policy, Development Management, Heads of Planning, Chief Executives, etc.). These groups were convened specifically for this purpose, for co-ordination of activity and to share best practice. A successful example is the Suffolk Sustainability Appraisal Group, initiated to produce county-wide annual monitoring indicator reports serving as joint evidence base material ('Suffolk's Environment'). A Suffolk-wide SA / SEA methodology has been developed together and used by each local planning authority for many years to support the Plans of each authority. Staff sharing and integration of local authorities is underway in various forms across Suffolk. A co-ordinating role has generally been performed by Suffolk County Council, previously in formal terms under the Structure Plan ~~but also for the RSSs~~. This continues

less formally under current planning system arrangements but a strategic planning role covering various different geographies remains in place nevertheless.

#### **2.6.4 Haven Gateway Sub-region (four IPA authorities; Tendring, Colchester and Braintree Districts in Essex; Suffolk and Essex County Councils) and New Anglia Local Enterprise Partnership (LEP)**

The HGP has led and co-ordinated a great range of planning and related work for the sub-region throughout the last decade since inception in 2001. With seven 2nd tier and two top tier authorities as formal members, it works to promote a large area straddling south-east Suffolk and north-east Essex. The success of the partnership itself, its geography and its approach is illustrated by the recent formal joining by Braintree District Council. This almost completes the connection of HGP affiliated local authorities among Babergh's adjacent local authority neighbours. The only exception now is St Edmundsbury, which is more remote from the ports and with ties looking westwards towards Forest Heath and the greater Cambridge sub-region.

The grouping has worked together effectively through its various formal group structures and HGP Board, joined around common goals of delivering growth and co-ordinating development and infrastructure. The HGP has also led efforts to ensure that the sub-region's advantages are maximised and external funding opportunities made best use of to the benefit of the whole area (and its constituent local authorities).

A good indicator of success was the achievement of New Growth Point status for the sub-region, levering in central government funds that have now mostly been invested. ~~Another was recognition and identification of the HG sub-region within the adopted RSS (together with its own suite of area-specific policies). In response, the~~ **The** overall sub-region has demonstrated a track record of delivering housing growth at or above RSS required levels. The same does not apply to jobs growth, which is recognised as problematic and in need of redress. However, overall, these considerations are deemed to provide justification and support for Babergh's jobs-led approach (and economic growth ambitions) and our jobs-housing growth balance.

At present it appears too early to assess the impact of the New Anglia Local Enterprise Partnership (LEP) here in respect of a role in strategic planning, although Babergh has remained supportive of this LEP and is willing to work together collaboratively on strategic planning matters. , .

## **2.7 Strategy for Growth**

The network of villages clustered around the towns and larger villages is a settlement pattern based on the functional everyday needs of Babergh's residents that has evolved naturally through time, and in particular reflects the changes that have occurred in the last half of the twentieth century. It provides a local identity and therefore seems logical to use this pattern as the basis for the development strategy for the future.

Evidence that has emerged from the consultation exercise points towards a preference for continued, incremental growth, at a scale appropriate to the size and character of the existing settlement. The relationship to the main urban areas within and beyond the district is important to the development strategy, which is underpinned by broad sustainable development principles. This focuses development for jobs, housing, shops and other infrastructure in the main urban areas.

In a large, rural district with a dispersed settlement pattern like Babergh, many villages are remote from urban areas; therefore an approach to development tailored to Babergh's own local characteristics seems appropriate. This approach also allows for continued smaller

scale growth of “hinterland” villages which, although they may provide less of a function for the surrounding area than the larger Core Villages, none-the-less would welcome and benefit from some growth of jobs and houses, especially providing homes which are suitable for local demand.

The overall development strategy for Babergh is to provide for a sustainable level of growth of jobs and homes to ensure that a better quality of life for everyone, now and in the future is achieved. Development of new jobs, homes, supporting infrastructure and other key services all need to ensure that the historic and natural environment is protected, together with locally distinctive characteristics of the towns and villages.

**The overall settlement hierarchy is set out in Policy CS1. The BUABs as previously defined (in the 2006 Babergh Local Plan) for the towns / urban areas, Core and Hinterland Villages remain in effect (unaltered) and Settlement Boundaries will be reviewed if necessary, defined and incorporated into the Site Specifics / Allocations DPD where appropriate.**

The Settlement and Distribution Policies below set out the overall strategy for future growth in Babergh until 2031 based on the functional settlement pattern and growth strategies described above and illustrated on Map 4.

#### **Policy CS1: Settlement Pattern Policy**

The development strategy for Babergh is planned to a time horizon of 2031. Most new development (including employment, housing, and retail, etc.) in Babergh will be directed **sequentially** to the towns / urban areas, and to the Core Villages and Hinterland Villages identified below. In all cases the scale and location of development will depend upon the local housing need, the role of settlements as employment providers and retail/service centres, **the capacity of existing physical and social infrastructure to meet forecast demands and the provision of new / enhanced infrastructure**, as well as having regard to environmental, ~~physical and social infrastructure~~ constraints, and the views of local communities as expressed in parish / community / neighbourhood plans.

#### **Towns / Urban areas:**

- Sudbury and Great Cornard
- Hadleigh
- Babergh Ipswich Fringe (edge of urban area)

#### **Core Villages serving Functional Clusters**

Core Villages will act as a focus for development within their functional cluster and, where appropriate, site allocations to meet housing and employment needs will be made in the Site Allocations document. ~~Rural exceptions sites will also be pursued for these villages according to identified local needs.~~

#### **The Core Villages identified on the Key Diagram are:**

- |                 |                |
|-----------------|----------------|
| • Bildeston     | • Glemsford    |
| • Boxford       | • Holbrook     |
| • Bures St Mary | • Lavenham     |
| • Capel St Mary | • Long Melford |
| • East Bergholt | • Nayland      |

#### **Hinterland Villages**

Hinterland Villages will accommodate some development to help meet the needs within them. All proposals will be assessed against Policy CS6. Site allocations to meet housing and employment needs may be made in the Site Allocations document where circumstances suggest this approach may be necessary.

Hinterland Villages are listed overleaf:

- Acton
- Aldham
- Assington
- Belstead
- Bentley
- Brantham
- Brent Eleigh
- Brettenham
- Burstall
- Chelmondiston
- Chelsworth
- Cockfield
- Copdock and Washbrook
- Edwardstone
- Elmsett
- Great Waldingfield
- Harkstead
- Hartest
- Hintlesham
- Hitcham
- Holton St Mary
- Kersey
- Lawshall
- Layham
- Leavenheath
- Little Waldingfield
- Monks Eleigh
- Nedging and Naughton
- Newton
- Polstead
- Preston St Mary
- Raydon
- Shimpling Street
- Shotley
- Sproughton
- Stanstead
- Stoke by Nayland
- Stratford St Mary
- Stutton
- Tattlingstone
- Wattisham
- Whatfield
- Woolverstone

#### Countryside

In the countryside, outside the towns / urban areas, Core and Hinterland Villages defined above, development will only be permitted in exceptional circumstances subject to a proven justifiable need.

#### Policy CS2: Strategy for Growth and Development

Employment and housing growth will be accommodated within Babergh's existing settlement pattern and in new mixed and balanced communities on the edges of the towns and the Babergh Ipswich Fringe. Particularly in the case of the latter (but also in other cases), a co-ordinated approach towards planning and development in nearby local authority areas will be adopted. In order to ensure this, close collaborative working will be maintained with all partners, including local authorities, the Haven Gateway Partnership and others.

#### The Local Economy

In order to support and encourage economic growth and employment opportunities and to ensure that a continuous range and diversity of sites and premises are available across the district through the plan period existing employment sites will be regularly reviewed, and where appropriate protected, and new sites allocated in DPDs. These will comprise:

- sub-regionally and locally strategic sites at Sproughton, Brantham, Wherstead Park (all allocated in this document) and the IP8 site, Sprites Lane, Ipswich (in subsequent document(s)), to accommodate the need for strategic and well-located sites for port-related and other businesses, and new business land and premises in Ipswich;
- allocations within mixed-use planned developments at Chilton (Woods) and land off Lady Lane, Hadleigh;
- employment land as part of mixed use development planned for the Strategic Allocations / Broad Location for Development; and,
- where appropriate, and subject to regular review, allocations will be made to protect existing and provide for new employment areas in towns, villages and the rural area.

Sufficient land will be allocated, and existing sites and premises protected from other types of development to accommodate a range of employment development to provide for approximately 9,700 new jobs in Babergh by 2031. This includes strategic sites and sites within the Ipswich Fringe which will be allocated and protected to provide for jobs growth for Ipswich.

Proposals for employment uses that will contribute to the local economy and increase the sustainability of Core Villages, Hinterland Villages and the rural economy will be promoted and supported where appropriate in scale, character and nature to their locality.

Proposals for uses in new and emerging employment sectors, particularly those that:

- re-use existing land or premises,
- contribute to farm diversification,
- enhance tourism and the attractiveness of the district as a destination for visitors; and/or
- design or produce low carbon goods or services, will be encouraged subject to scale and impact on their location, and the provisions of other policies in this Core Strategy and Policies document, particularly Policy CS10. A flexible approach will be taken to home working and other innovative approaches to sustainable economic activity that make a positive contribution to the local economy and are in scale and character with, and appropriate to, their location.

Town centres and Core Villages are the main focus for retail, leisure and community uses in the district. A healthy mix of uses and range of shops and services will be promoted in the two principal town centres of Sudbury and Hadleigh to ensure that these centres are active, vibrant and well used. Allocations will be made in the Site Specific DPD, as appropriate, for new retail floorspace in Sudbury and Hadleigh.

#### **Number and Distribution of New Homes**

Babergh District Council will make provision for 5975 new dwellings between 2011 and 2031 in the District. These dwellings are planned as follows: 1100 between 2011 -2016; and 4875 between 2017-2031. The housing target will be achieved by:

- Existing commitments as identified in the trajectory;
- Allowing for a windfall figure of 1640 dwellings;
- Making ) provision for 2,500 new dwellings to be built in the following locations:

**Proposed new land allocation numbers in this Core Strategy:**

Location	No of Dwellings
Sudbury and Great Cornard	850 <a href="#">(Note 1)</a>
Hadleigh	250 <a href="#">(Note 2)</a>
Ipswich Fringe	350 <a href="#">(Note 3)</a>
Core & Hinterland Villages	1,050 <a href="#">(Note 4)</a>
<b>Total</b>	<b>2,500</b>

**Implementation and delivery:**

The Council will introduce management actions to address housing delivery should there be a 20% deviation in housing delivery as opposed to targets for 2011-2016; and 2017 – 2021; and a 10% deviation for 2022-2026. These management actions could include constructively and proactively working with developers to bring forward committed or allocated sites; reviewing phasing of allocated sites; reviewing housing targets and associated policies; and allocating additional sites to meet targets if required.

[Note 1: This figure includes the additional 350 dwellings allocated at Chilton \(in addition to the 700 dwellings originally allocated in the 2006 Local Plan and carried forward in the Core Strategy\) \(see Policy CS3\) + 500 dwellings at the Strategic Broad Location for Growth – East of Sudbury / Great Cornard \(see Policy CS3a\).](#)

[Note 2: This figure is the dwellings allocated at the strategic allocation at Hadleigh \(see Policy CS4\).](#)

[Note 3: This figure is the dwellings allocated at the strategic allocation at the Ipswich Fringe \(see Policy CS5\).](#)

[Note 4: This figure is the allowance made for rural growth \(see Policy CS1\).](#)

**2.7.1. The table explained**

The housing figures set out above for the three urban areas (Sudbury and Great Cornard, Hadleigh, and Ipswich Fringe) are to be identified and delivered through the single, strategic, urban edge, extensions planned for each location. Accordingly, no further site specific housing land allocations would need to be identified for these urban areas in the Plan period to meet our chosen housing delivery figure. This will provide the significant benefits of clarity and certainty of approach for these urban areas and allow for making early plans towards their delivery.

Although 'windfall' housing developments will inevitably continue to arise in the Core and Hinterland Villages, sites will be identified and allocated in the Core and Hinterland Villages in the subsequent Site Allocations document to encourage and manage delivery of the 1,050 dwellings included in the table.

**Whilst some delivery of homes is likely for the Brantham redevelopment site during the Plan period, this has not been factored into the above figures as the scale and timing of this cannot yet be identified accurately. The site will therefore be treated as a housing 'windfall' and accordingly provides extra certainty that the district's overall planned new homes provision will be met, as well as extra flexibility through the plan, monitor, manage approach.**

## 2.8 Managing Future Growth

Whilst Core and Hinterland Villages will accommodate growth in accordance with local capacity, needs and aspirations Sudbury/ Great Cornard, Hadleigh and the Babergh Ipswich Fringe will be the main focus for sustainable growth over the plan period. Development Plan Documents (DPDs) such as the Site Allocations DPD will provide more detailed policies including site areas and boundaries, but these documents will follow this Core Strategy and Policies document and will need to have regard to the overarching core policies within it. A strategy and area policy for each of these areas provides a framework for the integration of growth with existing infrastructure capacity and future needs, and with local character, environmental constraints and opportunities.

### 2.8.1 Sudbury / Great Cornard

Sudbury is an historic market town with an attractive and vibrant town centre. The town has an important role in serving the shopping, leisure, social and cultural needs of the western part of the district, and in attracting tourists. The town, together with Great Cornard, has experienced substantial growth in the twentieth century with new employment areas, retail in the town centre and out-of-town (centre) locations, and housing to the north and in Great Cornard. The traditional silk weaving industry is still represented, but new industries and office uses are well represented in the town and employment areas.

This growth has resulted in problems with traffic flow and congestion around the town centre and air quality problems in Cross Street. Key transport issues for Sudbury/Great Cornard include ensuring new development has good links to the town centre for pedestrians and cyclists, improving town centre facilities for bus passengers, a western bypass (Local Plan Policy TP10, and Suffolk Local Transport Plan 2011 – 2031 (LTP3) refer), traffic management and air quality improvements.

The Babergh Local Plan Alteration No.2 (2006) allocated 19 hectares of land for residential development and 20.2 hectares for general employment and low impact employment uses at Chilton, known as the Chilton Mixed Use Development (Policy CP01). Limited progress has been made in bringing this land forward. In order to encourage implementation this outstanding allocation is reconfirmed and included in this document and programmed to deliver housing and employment land from the start of the plan period. However, additional new homes will be needed in Sudbury/Great Cornard and a further area of land is therefore allocated in this Core Strategy document at the Chilton Mixed Use Development to enable a further 350 dwellings to be accommodated and to provide sufficient land availability and flexibility to ensure the best possible form of development. The new, expanded boundaries of the area for growth at Chilton Woods (the name given to this area by a prospective developer) are shown on Map X.

In addition to the Chilton Woods area shown on Map X, and to ensure land is available to deliver new employment sites and 500 new homes for Sudbury/Great Cornard at the right time over the Plan period a new direction of growth has been identified to the east of the town. This has only been identified generically and is therefore only shown in indicative locational form at present. Implementation will be closely monitored, and the situation reviewed to enable the phased release of this additional land to be adjusted if necessary.

Boundaries and detailed policies / guidance on the identified Broad Location for future growth to the east of the town will be developed and refined through consultation and engagement with the local community, stakeholders, and landowners in future DPDs. In all cases it is important that all new development in Sudbury / Great Cornard, including development outside Chilton Woods and the Broad Location for development respects its context in terms of character, **infrastructure, integration, and accessibility** **and the capacity of infrastructure to accommodate planned levels of growth.**

The Localism Act 2011 provides the opportunity for Neighbourhood Plans to be developed by local communities to help shape the development and growth of their areas. Whilst some development parameters are well advanced (such as the Chilton Mixed Use Development Local Plan 2006 allocation) the twenty year plan period will see considerable growth and change in Sudbury/Great Cornard. The growth of the town through the plan period should reflect local expectations and aspirations, and future DPDs (such as Site Allocations or Area Action Plan) or a Neighbourhood Plan may provide the appropriate vehicle for such a framework for growth.

### **Policy CS3: Chilton Woods Strategic Land Allocation and Strategy for Sudbury / Great Cornard**

#### **A. Chilton Woods Strategic Land Allocation**

A comprehensive, mixed land-use development is allocated on 131 hectares of land in the Chilton and Woodhall area north of Sudbury as shown on map A. A masterplan will be required to guide development, together with development feasibility / viability evidence and a proposed phasing programme **(to include as a minimum the items listed i to vii below)**. This allocation is expected to provide an integrated, high-quality and sustainable development that fulfils the requirements of other policies in this Local Plan, particularly Policies CS0 and CS10, and reflects the aspirations of Suffolk's Greenest County initiative. The planning application(s) must be accompanied by an Environmental Impact Assessment.

**A piecemeal approach to development within the allocated area will not be acceptable unless such development conforms to an approved / adopted master and phasing plan and does not prejudice the delivery of necessary infrastructure.**

The development will provide and include and the masterplan will show:

- a. **Approximately 15** 15.7 hectares of new employment land on the western part of the development (north of Woodhall Business Park) for employment related uses. ~~(to include provision for a waste transfer station, household and recycling and refuse depot).~~ Access to this development will be via a new distributor road linked to the A134 west of the existing Tesco superstore. An Initial phase of employment development may make use of an additional means of access via Woodhall Business Park as part of a comprehensive and agreed access strategy and phasing plan;
- b. **Approximately 5** 5.3 hectares of land to the north of Waldingfield Road are allocated for employment related use(s) (towards the scheme's eastern end) **subject to the new development having** with only a low impact **only** in terms of traffic generation and on **nearby** residential amenity. Some of this allocated development has already been implemented and is in situ. Access to this development will be via Waldingfield Road;
- c. **Provision for a waste facility, to include household waste and recycling centre;**
- d. Provision for **approximately** 1,050 new homes (on an allocated area of **approximately 33** 32.6 ha.). The **This** residential element is required to have direct access to the A134. Access will be provided from a new distributor road designed to link the A134 with Aubrey Drive;
- e. Designed provision for effective functional separation between residential

areas and employment land, particularly for those land uses / activities with greater impact on residential amenity (often non B1 type employment activities);

- f. ~~Structural landscaping / community woodland~~ Provision of community woodland and structural landscaping (minimum of ~~30.5~~ approximately 30 hectares) located throughout the site and along the boundaries of the site. This must be designed to take account of existing features such as trees, hedgerows and watercourses, and to coordinate with the spatial requirements, design and context for the items referred to in point g and h below. The scheme must ~~include~~ provide for long-term, comprehensive financial and management / maintenance plans and arrangements and for such community woodland, and for the local community and Chilton Parish Council, Sudbury Town Council, Long Melford and Acton Parish Councils to be involved in its design, establishment and management;
- g. Surface water attenuation will be required to minimise the risk of flooding (the preferred means being SUDS)
- h. Provision of landscaping, green infrastructure (which may incorporate 'blue' infrastructure such as balancing ponds/wetland created as part of the SUDS) and open space / leisure & recreational facilities (minimum ~~8.2~~ approximately 8ha); and also an area of allotments of between 0.5ha and 1ha, which is to be agreed with local parish councils. This provision is to be in addition to the community woodland and structural landscaping referred to above. Green infrastructure to be planned to coordinate with the wider network for Sudbury and Great Cornard area;
- i. A transport assessment based upon the development proposals will be required and a travel plan ~~may~~ will be necessary;
- ~~Provision of an appropriate new neighbourhood centre for the development with local retail provision and community facilities (minimum 1.6ha);~~
  - ~~Provision of approx.1.6ha of land for community facilities /uses (provision for which may be integrated together with the neighbourhood centre if such a location is appropriate).~~
- j. Provision of a well located and accessible community 'hub'/ village / neighbourhood centre and land of an appropriate size to accommodate community infrastructure uses such as:
- community facilities, services and uses such as a community hall/building with flexible space for community meetings, and/or sports and social club with changing rooms, and associated sports pitches (such as cricket and football), and/or multi-surface sports areas, and parking;
  - local retail provision, and a pub and/or café, and leisure uses, business space and a residential element including opportunities for live/work units; and
  - a civic square/area for market stalls/community meeting area.
- k. Provision for ~~approximately~~ 3 ha. of land for education (primary school / nursery provision) and associated uses;
- l. An evidence-based package of sustainable transport measures to include the creation of new routes and/or the enhancement of existing links for pedestrians and cyclists to the town centre, rail station, employment areas, schools, bus stops, etc.

- m. Any requirement for off-site transport / highway improvements will be determined by transport assessment evidence;
- n. Any requirement for mitigation of healthcare impacts will be determined by evidence that proposals can be supported by existing infrastructure and/or a reasonable prospect of provision of funding to meet the needs arising from the development.

The land uses specified above have been established through masterplanning and Place-Shaping work. The approximate land areas are indicated as a guide for the preparation of a masterplan as part of the planning application process. The land uses identified above comprise 94.5ha of the total 131ha of site area, and individual elements of the development will be considered in the context of the comprehensive development of the site, and on evidence available at the time.

The masterplan and supporting studies and feasibility/viability evidence should demonstrate and include:

- i. how the overall development, including its access points, positively responds to, and where possible enhances, designated heritage assets and their settings;
- ii. how the development will be designed to suit the landform / topography and landscape characteristics of the site and its local context, and protect the amenity of existing and future residents;
- iii. design principles for each development parcel (residential, business / employment land, community / neighbourhood centre / hub) including addressing the sustainable development policies in this and subsequent local plan documents (if relevant), and how they will be implemented;
- iv. outcomes from community engagement and mechanisms to establish delivery and ongoing management of community resources;
- v. phasing of the development including provision of buildings, social and physical infrastructure and services;
- vi. a biodiversity plan including any measures for protection, mitigation, compensation and/or new habitat creation; and
- vii. the range, density and mix of housing types (including affordable housing provision) in line with Policies CS14 and CS15.

#### Implementation and Delivery

The Council is committed to working co-operatively with partners and Chilton Parish Council, Sudbury Town Council, Long Melford and Acton Parish Councils and the local community to bring forward and deliver the Chilton Woods scheme in a timely way. This will include joint action to overcome a potential key development issues, such as the ~~around~~ electrical power supply in the Sudbury area and its likely impact on development viability. It will also work jointly to ensure timely delivery of satisfactory access arrangements, sustainable transport provision, the community woodland, necessary community facilities and structural landscaping / woodland screening at the appropriate point in the overall development process.

Development at Chilton Woods is programmed for commencement in the earliest part of the Plan period. Progress on its planning and development will be closely monitored and the following phasing and timing reviewed to ensure delivery of an appropriate amount of new housing and employment land through the plan period:

- i. 2012 onwards - implementation of the Chilton Woods Mixed Use Development as shown on Map A in accordance with this Policy;
- ii. 2016 - review of progress with delivery of Chilton Woods and target date set for release of land for employment and housing in the Broad Location of Growth identified on the Key Diagram;
- iii. mid – late part of plan period (or earlier if required following the 2016 review) – Masterplan submitted and approved and first phase of land released for development for employment land and approximately 500 dwellings in accordance with Policy CS3a.

#### **B. Other Development for Sudbury / Great Cornard**

A Neighbourhood Plan and/or other DPD(s) will be prepared to provide a comprehensive framework to ensure that any planned growth and development for Sudbury / Great Cornard (other than that at Chilton Woods) is well integrated with the town and delivered at the right time.

Development in Sudbury / Great Cornard should comply with other policies in this Local Plan, particularly Policy CS10, and other subsequent documents, and where appropriate, provide:

- high quality design, structural landscape planting, and layouts and scale of development that respect adjacent landscape or townscape features, ensure a separate identity and avoid creeping coalescence with adjacent settlements;
- a green infrastructure framework connecting with and adding or extending formal and informal green spaces, wildlife areas, and natural landscape settings and features;
- good links and/or the enhancement of existing links for pedestrians and cyclists to the town centre, rail station, employment areas, schools, bus stops, etc.

#### **C. Sudbury Town Centre**

As the district's principal town centre, the Council will encourage and support the continued growth, expansion and diversification of Sudbury town centre to serve its catchment area, particularly the provision of larger, more versatile retail and service units and improvements to public transport, strategic and local access.

#### **Policy CS3a Strategic Broad Location For Growth - East of Sudbury / Great Cornard**

Provision will be made for land to be developed for employment uses and approximately 500 new homes within the broad location for growth to the east of Sudbury / Great Cornard, as shown on the Key Diagram. The site extent, definition of the boundary and detailed guidance for this will be developed and refined through consultation and engagement with the local community, stakeholders and landowners in a future DPD. The amount of land to be released for employment uses as part of this mixed use development will be informed by the evidence and monitoring of the employment trajectory and land availability at the time.

Development of land for employment uses and approximately 500 new homes within the broad location for growth east of Sudbury / Great Cornard will need to:

- (a) Ensure that high quality design and the layout respect the adjacent landscape, heritage assets, topography and townscape;
- (b) Ensure the new development has a separate identity and avoids coalescence with adjacent settlements;
- (c) Ensure development incorporates a green infrastructure framework connecting, adding or extending formal and informal green spaces, wildlife areas and natural landscape settings and features;
- (d) Ensure good links and / or the enhancement of existing links for pedestrians and cyclists to achieve strong connectivity to the town centre, rail station, employment areas, schools, community facilities and bus stops etc; and
- (e) Ensure adequate provision of supporting infrastructure including education provision, community facilities and transport.

#### Implementation and Delivery

The timing for the delivery of development within this broad location for growth will be the mid-late part of the plan period, unless monitoring of progress for policy CS3 requires development to the east of Sudbury/ Great Cornard to come forward sooner. Progress for the delivery of Policy CS3 will be closely Monitored and the following phasing and timing reviewed to ensure the delivery of an appropriate amount of employment land and new homes throughout the plan period;

- (i) 2016- review of progress on the delivery of policy CS3 (Chilton Woods Mixed use development) target date set for the release of land for employment and housing land within the broad location for growth east of Sudbury / Great Cornard;
- (ii) 2016-Mid part of the plan period, work with the local community, stakeholders and landowners to clearly define the boundaries and parameters for the mixed used (employment uses (amount to be defined at this stage based on monitoring and review of the employment evidence) and approximately 500 new homes) Broad Location for growth east of Sudbury/ Great Cornard through the preparation of a further DPD;
- (iii) Mid-Late part of the plan period (earlier if required by the 2016 review date) a Masterplan to be submitted and approved for the first phase of land released for development for employment uses and approximately 500 homes.

#### 2.8.2 Hadleigh

Hadleigh is the second largest town in Babergh, and although a small town it has an important role as an employment and local service centre for the mid-Babergh area. The historic character of the town, with the River Brett forming the western boundary, provides an attractive setting for a wide variety of shops and service facilities that includes a range of

specialist shops that draw people from outside the immediate area and contribute to the visitor and tourist offer. The Council will continue to encourage and support the vitality and traditional character of Hadleigh town centre and the provision of additional local services.

The A1071 bypasses the town and provides good access to the main employment area. The shape of the town means that the residential areas on the northern, eastern and southern edges are some distance from the town centre, and with through traffic using the High Street, pedestrian and cycle access and safety is a key priority for future development.

The natural and physical constraints and sensitive landscape setting of Hadleigh limit the amount and direction of growth and further development to the east of the town will rely on implementation of the A1071 / Lady Lane roundabout for access and will, in effect, be an extension of the 2006 Local Plan mixed use allocation in Policies HS15 and EM03. Map Y shows the extent of the area of land allocated to provide an additional 5.5 hectares of employment land and 250 dwellings in Hadleigh during the plan period together with sufficient land to ensure provision of green infrastructure, SUDS drainage, structural landscaping, and a comprehensive approach to growth in this area.

## **Policy CS4: Strategic Site Allocation and Strategy for Hadleigh**

### **A. Hadleigh Strategic Site Allocation**

Land is allocated to the immediate east of Hadleigh for mixed use development as indicated generically on the Key Diagram and shown on Map B. Development within this area should be guided by a masterplan and development feasibility evidence and provide:

- **Approximately 5.5 hectares of employment land;**
- **Approximately 250 dwellings;**
- **How the development will be designed to suit the landform / topography and landscape characteristics of the site and its local context;**
- **high quality design, structural landscape planting, and layouts and scale of development that respect adjacent landscape or townscape features, and maintains the separate identity of Hadleigh;**
- **design principles for each development parcel (residential and business/employment land) including addressing the sustainable development policies in this and subsequent local plan documents, and how they will be implemented;**
- **the range, density and mix of housing types and the level of affordable housing provision in line with Policies CS14 and CS15;**
- **phasing of the development including social and physical infrastructure and services, and where appropriate, including any development or provision proposed beyond the plan period;**
- **a green infrastructure / open space framework connecting with and adding or extending formal and informal green spaces, wildlife areas, and natural landscape settings and features, and proposals for green and blue infrastructure to assimilate new development into the landscape and create new habitats. This must provide for a significant functional buffer providing effective separation between residential and employment uses (where such uses may have material adverse impacts on residential amenity);**
- **a biodiversity plan including any measures for protection, mitigation, compensation and/or new habitat creation;**
- **a drainage strategy, with provision for a sustainable urban drainage**

**system:**

- good links and/or the enhancement of existing links for pedestrians and cyclists to the town centre and other local shops and services, employment areas, schools, bus stops, etc.;
- ~~evidence-based measures to enhance social / community facilities provision as necessary;~~
- **enhanced or additional social / community facilities (such as provision of allotments, or cemetery, or community open space within the green infrastructure framework, and/or meeting room / social centre / community hall) as evidenced through local community engagement in the masterplanning process;**
- ~~principal access to be provided by~~ **vehicular access by means of** the main north-south spine road served from the A1071 roundabout; ~~together with a secondary / emergency form of~~ **an access on to Frog Hall Lane only for pedestrians, cyclists and emergency vehicles,** ~~if necessary.~~ Off-site transport improvements may also be necessary; **In addition, a travel plan will be required.**

### Implementation and Delivery

No critical obstacles have been identified for this development to proceed and its implementation has been provided for in the early part of the Plan period. The principal planning mechanism of a masterplan will facilitate this early delivery.

Development of this allocation together with any other new development in Hadleigh will be closely monitored and reviewed to ensure delivery of an appropriate amount of new housing and employment land through the plan period:

- i. 2012 - 14 – preparation and consultation on a masterplan for the area shown on Map B in accordance with this Policy;
- ii. 2014 - 15 - review of progress with submission and consideration of a planning application for the allocated site;
- iii. 2018 – review progress with delivery and if necessary review alternatives through a neighbourhood plan or other DPD.

### B. Strategy for Hadleigh

Hadleigh will be promoted as a visitor attraction and a wide range of diverse uses and facilities will be encouraged. ~~Small scale refurbishments and redevelopments aimed at enhancing retail quality and consumer choice will be supported in this centre.~~ **Development for town centre uses and refurbishments that enhance the retail quality, choice and vitality / viability of Hadleigh town centre will be encouraged.**

**Note: The land uses identified above are indicated as a guide for the preparation of a detailed masterplan as part of the planning application process, and individual elements of the development will be considered in the context of the comprehensive development of the site, and on evidence available at the time.**

### 2.8.3 Babergh Ipswich Fringe

The urban edge of Ipswich extends into and borders Babergh district, and the town provides jobs, services, leisure and cultural facilities for many Babergh residents. The creation of mixed and balanced sustainable communities means that a proportion of Babergh's growth should be accommodated in the Ipswich Fringe area to provide the opportunity for homes and jobs close to existing jobs and services and good public transport links.

Accommodating growth in Babergh's Ipswich Fringe is difficult, particularly as the geography of this area does not fit well within administrative boundaries. The village of Sproughton is a distinct settlement west of the A14 and is included in the list of Hinterland Villages. However, the built-up areas on the edge of Ipswich in the parish of Sproughton cannot logically be considered as being in the countryside, and will therefore be considered as part of the Ipswich urban area for the purposes of planning policy. Similarly Pinewood has not been included as a Hinterland Village in Policy CS1 as although it is a distinct neighbourhood/community it is also part of the Ipswich urban area, and will be considered as such for planning policy purposes.

The A14 and A12 are important communication routes essential to the local economy, and congestion at the Copdock junction should not be exacerbated by development in this area. Attention is drawn to Policy CS17 and the table in Appendix 3, and to the need for early consultation with the Highways Agency.

The Special Landscape Area includes the Chantry Vale area on Ipswich's western boundary and the River Gipping, which separates this area from the former Sugar Beet factory to the north. The River Gipping is an important natural feature that will be protected for its biodiversity and recreational value. A country park along the southern edge of Ipswich provides an essential green space for local residents, and forms a potential link in a wider green infrastructure network. This has also been identified as an area potentially suitable for the location of wind turbines to produce renewable energy for homes and businesses in the area.

The area allocated for mixed use development on Map Z is well contained, already partly developed, available / deliverable, and with the potential and the capacity to provide a new community of 350 dwellings around existing dwellings within walking distance of shops, other facilities / services, bus services and a pedestrian / cycle route; and a quality business 'gateway' site comprising 6 hectares of employment land reflecting the Suffolk One sixth-form college and planned office development on the opposite side of the road.

An allocation of 350 new homes and new businesses on 6 hectares of employment land will result in a new community that will not be large enough to make the provision of many services and facilities viable within the site. However, residents will be within walking distance of the park and ride and other local bus service routes, and a primary school and grocery shopping (at the Copdock retail area). The new community will be large enough, particularly with new business premises, to require the provision of a nursery (early years education) within the development area. The provision of this facility, and contributions towards the on-going cost of primary school travel will need to be secured through planning conditions and/or a S106 agreement.

The remaining area of open land between the A1071 and the western edge of the Ipswich urban area (adjacent to Chantry Park) is of a larger scale and of greater scenic value. It has more complex development issues, is of unproven availability / deliverability at this time, and is not considered to be sequentially preferable overall for such reasons.

The long-term future of this area, which includes the Chantry Vale dry valley and the mature trees within Chantry Park visible on crest of the eastern slope, needs to be

considered and planned with the local communities – those in the urban area, those in the parish of Sproughton where the A14 has severed the community, and those who will live and work in the allocated area – also with Ipswich Borough Council and other principal stakeholders (including landowners / developers, service providers, etc.).

Whilst there is clearly the potential and the capacity for this undeveloped, largely agricultural land to make a major contribution to the green infrastructure and other needs of the area, especially in providing for recreation and open-space needs, this may only be able to be delivered as part of a comprehensive plan for the whole area that would be likely to include some development of the urban edge. However, the scale and scope of this is larger than Babergh's requirements for this current plan period and an allocation in this area at this stage appears premature and may lead to an unacceptable piecemeal approach that would be damaging to a comprehensive plan for its future.

#### **Policy CS5: Strategic Site Allocation: Babergh Ipswich Fringe**

**Approximately 26 hectares of land within Babergh's Ipswich Fringe are allocated for mixed use development as shown on the Key Diagram and on Map C to provide:**

- **Approximately 6 hectares of land to create a quality 'gateway' business/employment area in addition to the 'existing employment uses within the allocated area'; and**
- **a new community of approximately 350 homes;**

**A masterplan will be required which should:**

- **be based upon and designed around a green infrastructure framework providing high quality design, structural landscape planting, and connections to or potential links with existing formal and informal green spaces, wildlife areas, and natural landscape settings and features, particularly the Gipping Valley footpath, Chantry Park and Belstead Brook Park, and ensure a separate identity and avoid creeping coalescence with adjacent settlements; and**
- **provide good links and / or the enhancement of existing links for pedestrians and cyclists to local shops and services, schools, employment areas, and public transport routes and services.**

**The masterplan and supporting studies and feasibility / viability evidence should demonstrate and include:**

- **the basic road network, links to the existing highway network, and any consequential off-site highway improvements required;**
- **a Travel Plan designed to optimise the use of buses, cycles and walking, and specifically to address travel to school journeys including road crossings, and the long-term implications of school transport funding and provision. The scale/proportion of developer funding necessary and a delivery/funding implementation timetable will need to be the subject of a S106 agreement and should be illustrated in the masterplan to ensure revenue funding is secured to enable the relevant infrastructure / service to be in place from the first occupation of the site and for the medium to long term;**

- primary school and nursery (early years education) provision and timing of delivery;
- how the development will be designed to suit the landform / topography and landscape characteristics of the site and its local context, and protect the amenity of existing and future residents;
- design principles for each development parcel (residential and business/employment land) including addressing the sustainable development policies in this and subsequent local plan documents, and how they will be implemented;
- phasing of the development including provision of buildings, social and physical infrastructure and services, and where appropriate, including any development or provision proposed beyond the plan period;
- structural / major landscaping, open space and proposals for green and blue infrastructure to assimilate new development into the landscape and create new habitats; a biodiversity plan including any measures for protection, mitigation, compensation and / or new habitat creation;
- the range, density and mix of housing types and the level of affordable housing provision in line with Policies CS14 and CS15;

#### Implementation and Delivery

It is expected that development in the allocated area will start to be delivered in the early - middle part of the plan period. No critical risk factors or delivery obstacles likely to cause substantial delay have been identified.

Implementation in the allocated area will be closely monitored and reviewed to ensure delivery of an appropriate amount of new housing and employment land in Babergh's Ipswich Fringe through the plan period:

- 2012 - 14 – preparation and consultation on a masterplan for the area shown on Map C in accordance with this Policy;
- 2014 - 15 - review of progress with submission and consideration of a planning application for the allocated site;
- 2018 – review progress with delivery and if necessary review alternatives through a neighbourhood plan or other DPD.

Note 1: <sup>1</sup>The masterplan should indicate and respect the existing employment uses within the strategic site allocation, and proposals to intensify and/or expand these existing uses will be encouraged and treated on their merits providing such proposals compliment new employment uses emerging through the masterplanning and planning application processes.

Note 2: the land uses identified above are indicated as a guide for the preparation of a detailed masterplan as part of the planning application process, and individual elements of the development will be considered in the context of the comprehensive development of the site, and on evidence available at the time.

#### Sproughton – former sugar factory site

The former sugar factory site at Sproughton is similar to the large employment area at Cattawade in as much as it is mostly un-used and vacant, of a large scale, and close to river, countryside, and other developed areas. However the location, nature, and role of these sites are very different. The Sproughton site is on the urban edge of Ipswich

immediately adjacent to Junction 54 of the A14 and is a sub-regionally important strategic employment site. Babergh is part of the Haven Gateway and Ipswich Policy Area, and the importance of this site has been identified and recognised through evidence research, and by joint working with neighbouring authorities and the Haven Gateway Partnership.

This site has potential to accommodate opportunities for port-related activities / companies, and for a wide range of industrial and commercial business premises to provide employment to residents of Babergh, Ipswich, Mid Suffolk and Suffolk Coastal.

#### **Policy CS5a: Sroughton Strategic Employment Land Allocation**

The former 'British Sugar' (sugar beet factory) site, Sroughton (Ipswich fringe) is allocated for retention in employment related use(s) as shown on Map D. Proposals for redevelopment or re-use of the previously developed site (35.5 hectares) must be planned / approached on a comprehensive basis, with regard to the future of the entire site. Co-ordination of development could be achieved through a masterplan and / or development brief / concept statement.

**Development should comply with other policies in the Core Strategy particularly Policy CS10, and other subsequent documents.** Applications will be assessed with regard to:

- protection of the biodiversity of the locality and any opportunities for enhancement;
- protection of the wider river environment in the locality and any opportunities for enhancement, including improvement of the River Gipping Riverside Path;
- retention of the natural area known as the island site (a separate 16 hectares approximately) and existing landscape tracts, together with proposals for further measures;
- no material adverse impacts on residential amenity;
- production of a satisfactory green travel plan, **with regard to provision / upgrading of sustainable transport access between the site, nearby villages and Ipswich town centre as necessary** and
- the provision of any necessary measures to address transport impacts off-site, **including speed management, remodelled roundabout(s) providing access to the A14 and mitigation of additional development-related traffic generated through Sroughton village;**
- production of a Flood Risk Assessment; and
- feasibility / viability evidence

#### **Implementation and Delivery**

The Council is committed to the successful redevelopment of this site and will work collaboratively and proactively with the landowner(s) / developer(s) and other interests towards this end. In principle, delivery of the site with the assistance of higher value commercial uses may **will** be acceptable. Part of the site may be required for residual waste treatment use, as provided for by the extant Waste Core Strategy (2011-2026).

As a very large site, the site area may be broken down into different types of employment / commercial uses and redevelopment implemented in phases. In this way, it is anticipated that a consortium of site users / occupiers may be

required to achieve redevelopment. The Council is also supportive of port-related development for the site ([Note 1](#)). The Council will also pursue and support in principle initiative(s) aimed at securing external funding for the successful delivery of this site's redevelopment (where justified) or accelerating its timescale if appropriate.

The scale and complexity involved in redeveloping this site means that it is difficult to anticipate when specific phases will align with this Plan period. The Council will continue to work with neighbouring authorities in the Ipswich Policy Area and Suffolk Haven Gateway to promote and encourage redevelopment of this strategic site in the A14 corridor. Progress will be regularly monitored and the latest position reflected in regular employment land reviews and trajectories. If there is no progress with enabling this site to be made available for employment development (i.e. through ownership or other issues) within five years of adoption of this local plan [Core Strategy](#), the allocation will be the subject of review (to align with regular monitoring and review of sub-regional and locally strategic employment sites in the A14 corridor with neighbouring (IPA and SHG) authorities / organisations).

[Note 1: Current evidence indicates that this is not anticipated to take the form of a 'Dryport' \(intermodal freight transport\) solution.](#)

## Wherstead Park

The Wherstead Park complex (currently mainly used as CoOp Eastern Region HQ) is substantial employment site of 7.1 hectares, located just south of Ipswich. The site has some development constraints, including its relationship / junction access to the A14, together with an inadequate access road. However, it also enjoys significant advantages and opportunities, including the quality of environment in which it sits and the quality of environment afforded at the site itself. It is considered an unsustainable location for residential development. However, significant job opportunities and an important wider economic contribution are provided here and at other smaller developments nearby. It is important to both Babergh and Ipswich that the site is retained for employment related uses over the Plan period. There is also scope for consolidation of employment and commercial activities at the site. The Council will adopt a positive approach towards development that sustains this and ensures the future prosperity and viability of economic activity at Wherstead Park. It will also work closely with key partners including Ipswich Borough Council, Suffolk County Council and the Haven Gateway Partnership towards these ends. As far the situation is known at present, there are not reasons to expect this site to be vacated by the current main occupiers during the Plan period.

## Policy CS5b Wherstead Park Strategic Employment Land Allocation

The existing Wherstead Office Park (7.1 hectares), Wherstead is allocated for retention in employment uses as shown on Map E. ~~A further 3.3 hectares of land immediately to the west is allocated for B1 development, as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended).~~ Residential development will not be considered acceptable at this collective site, apart from the conversion of the existing gatehouse buildings at the entrance of the Office Park from The Street. ~~The new greenfield allocation must be developed in the context of its adjacent site, although the latter may not be subject to redevelopment itself in the Plan period.~~

**Applications will be assessed with regard to:**

- the setting of the listed buildings;
- protection of the playing field; and mature landscaping belts;
- no material adverse landscape impacts on the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty;
- no material adverse impacts on neighbouring residential amenity;
- ~~provision of a new access from the A137 (designed and constructed to adoptable standards) to serve both the existing and new employment site, and closure of existing access from The Street to all but cyclists, pedestrians and emergency vehicles;~~
- production of a green travel plan / contribution(s) to provision of local bus services;

#### **Implementation and Delivery**

The Council will deliver its commitment to retention and promotion of the main Wherstead Park site in employment / commercial uses by working closely with leading partners including: Ipswich Borough Council; Suffolk County Council; Haven Gateway Partnership and the site's owner(s) / occupier(s). Any major changes leading to a loss of employment floorspace or significant diminution in occupation levels during the Plan period will prompt a review (to align with regular monitoring and review of sub-regional and locally strategic employment sites in the A14 corridor with neighbouring (IPA and SHG) authorities / organisations).

~~The additional 3.3 ha. of land remain allocated at this point but this will be reviewed and the allocation reconfirmed or deleted in the subsequent local plan / DPD documents.~~

#### **2.8.5 Brantham Redevelopment / Regeneration Area**

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.

The existing / former industrial site 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.

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- and the owners have suggested that some or all of this land (see Map F) should be developed for housing and open space, as part of the development package, in order to promote overall regeneration. This is being investigated and the policy allows through proviso D, for these issues to be resolved.

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 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.

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.

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.

Given the site's scale and position near the border with Tendring / Colchester in Essex, the importance of working on cross-boundary matters is recognised. Its relationship with nearby rural areas (in all 3 districts) and particularly with Lawford / Manningtree / Mistley is also important.

#### **Policy CS6a Brantham Regeneration Area Allocation**

**Land at Brantham Industrial Area is allocated as a regeneration area and special policy area (as shown on Map F) where the retention of current and future employment uses is to be prioritised and the redevelopment of obsolete buildings and under-used land achieves a balanced form of mixed-use development.**

**Comprehensive redevelopment proposals for the whole of the allocated site will be informed and guided by feasibility / viability evidence and a masterplan. Together these will ensure the enhancement and balanced regeneration of the site; provide for the maximum possible retention and enhancement of local**

employment opportunities; deliver an appropriate level of residential development and community facilities; create new areas of public open space and enhancement of pedestrian and cycle links between the site and the village.

- A. The land north of the railway line (25 ha.), being the former Wardle Storey and ICI (now ITW) works sites, forms the priority area for redevelopment, where new and retained employment land uses should predominate in principle
- B. The land south of the railway line (partly previously developed) (15 ha.) is expected to be subject to minimal or no new development. In this area, the opportunity to provide and enhance natural ecological assets should be prioritised
- C. The scale location and form of residential development should be determined with regard to:
  - a level that is proportionate in scale to the existing village / parish and capable of satisfactory assimilation;
  - the need to ensure that new residential development is provided in suitable location(s) in relation to flood risk;
  - the need to provide a satisfactory relationship with other land uses, including potential 'bad neighbour' activities and processes; and
  - where access to ~~local facilities, services and employment opportunities~~ and local facilities / services that have capacity to accommodate growth or new facilities / services are maximised; addressing the meeting of identified housing needs.
- D. If viability evidence for a comprehensive and integrated planning solution to the whole site suggests additional residential development on some of the adjacent Greenfield land, between the site and the village (see Map F), this will be considered in relation to the benefits of the overall regeneration package.

Applications will be assessed with regard to:

- an appraisal of the nature, extent and means of remediation of any land contamination present on the site;
- production of a Flood Risk Assessment;
- protection of the biodiversity and wider river environment in the locality and any opportunities for enhancement;
- protection of the area's cultural heritage;
- impacts on existing landscaping tracts, together with proposals for mitigation / further landscaping measures;
- landscape impacts on the wider Dedham Vale and Suffolk Coast and Heaths Areas of Outstanding Natural Beauty;
- no material adverse impacts on neighbouring residential amenity;
- satisfactory improvements to and integration with the local road network, including vehicular access to the A137, separation of industrial and residential traffic within the site, the integration of pedestrian and cycle links, the production of a green travel plan, and contribution(s) to provision of local bus services.
- development feasibility / viability evidence

## Implementation and Delivery

The Council is committed to achieving the positive, prompt and beneficial regeneration of this site and will continue to work constructively and proactively with landowners / developer(s) and other interests towards that end. The Council will also pursue and support in principle initiative(s) aimed at securing external funding for the successful delivery of this site's regeneration (where justified) or accelerating its timescale if appropriate.

Given the lead time required to resolve complex planning and development issues; ensure a satisfactory form of development; and to see the build out of the regeneration area, a specific phasing period for this scheme within the Plan period is not considered appropriate.

Progress will be regularly monitored and the latest position reflected in regular employment land reviews and trajectories. If there is no progress with preliminary work enabling this site to be redeveloped within five years of adoption of this local plan the allocation will be the subject of review (in consultation with neighbouring authorities).

### 2.8.4 Core and Hinterland Villages

It is intended to provide greater flexibility within rural communities, allowing growth and service / infrastructure improvements, to develop in line with the day to day practice of people living in those communities.

The approach advocated for the management of growth in the Core Villages and their hinterlands, has many benefits for the communities. The application of Policy CS6 and other relevant policies in the Core Strategy and Policies document will lead to the following benefits:

- **Greater flexibility in the provision of affordable housing.** The provision of affordable housing relates to need, however this approach will enable need to be considered more widely than just within the context of individual settlements. It will allow for provision in one village within a functional cluster to serve, not only that settlement, but also the other villages within that cluster and in some cases adjoining clusters.
- **Greater flexibility in the allocation / take up affordable housing.** Operating within a more flexible approach will enable a much wider take up of affordable housing. Those in identified need in any other villages within the functional cluster (or in some cases adjoining cluster) may be entitled to live in the affordable housing provided within other villages within that cluster. The allocation of affordable housing will be more flexible and its location will reflect where people go for everyday needs, including to Primary School and the Doctors.
- **Flexibility in the provision and location of facilities.** The provision of facilities, required to support, or mitigate the impacts of, development is tightly controlled by legislation (Circular 05/05) and more recently the Community Infrastructure Levy Regulations. The important point central to this, which must be adhered to, is that any facilities being provided must be for the benefit of the residents living in the new development, which is making that provision, or contribution towards it. However, many facilities, such as schools, community halls and shops, serve a catchment area far beyond the village in which they are located. The policy approach for the Core and

Hinterland Villages allows for a more flexible approach to the location of facilities to reflect a catchment area pattern which relates to the day to day practice of the people living in the villages.

- **Flexibility in the provision and location of leisure and recreation facilities.** Recreation and leisure facilities have a long established hierarchical approach, based on catchment areas which relate to the function of the facilities. Large facilities such as swimming pools and sports centres, serve a much wider catchment area than more local facilities such as children's play areas. This lends itself well to the approach suggested for Babergh. It allows for better quality provision, and greater flexibility with the location of facilities. For example any one catchment area, may only need one facility such as an all weather pitch. Whilst the core village may be the first choice location of this, another village within the same functional cluster, may have a greater opportunity to accommodate such provision. The flexible approach embedded in the functional cluster concept would allow for this.
- **Flexibility in provision of employment.** Employment provision in the rural areas in Babergh already makes up a significant contribution towards job opportunities in the district. Securing a range of economic opportunities requires a flexible approach. Often the locational requirements of employers are very specific and do not always coincide with, or may be unavailable at, the most sustainable locations. Within, or close to, urban areas will always be a preferred location for most employment opportunities however, where this is not possible, opportunities within Core Villages and some Hinterland Villages within the functional cluster will be considered. A flexible approach to considering such opportunities is critical to promoting economic development in the future. The policy approach allows for the flexibility to maximise opportunities for employment, subject to balancing other interests within the Core Villages and their hinterland. This approach will also allow for the opportunity to balance the provision of new jobs with new housing development within the cluster subject to the relevant policy considerations.

Core Villages will accommodate a proportion of new development, and as each village is different in size, character, location and the role it plays within its rural hinterland it is not possible to identify a number, or range of homes numbers at this stage. The amount of new development and locations for growth in each of these settlements will be considered in detail with local communities at the site allocations stage and will depend on a thorough analysis of local needs, opportunities, environmental, physical and social infrastructure constraints. **Including:**

- **Locally identified need – housing and employment;**
- **Specific local need such as affordable housing;**
- **Flood Risk**
- **Nature conservation constraints / designated areas and implications for an Appropriate Assessment under the Habitats Directive (where appropriate);**
- **Landscape considerations and the designated sites (particularly ANOBs);**
- **Historic character and heritage assets;**
- **Infrastructure constraints – physical infrastructure / utilities;**
- **Infrastructure needs (e.g. transport, open space, leisure facilities) and access to services and facilities; and**
- **Availability of brownfield land.**

It is clear that the Core Villages identified are very varied and their needs and factors which influence what is an "appropriate level of development" will vary from village to village. **This is especially the case where villages are situated within environmentally and visually sensitive landscapes, particularly the AONBs, and/or where they include**

**conservation areas and heritage assets. These landscapes and heritage assets will be key considerations in the site allocation process, and when considering planning applications.** Although a total number of 1050 new dwellings is indicated in Policy CS2, this includes the ten Core Villages and all the Hinterland Villages. It is therefore important that this is not viewed as a sum simply to be divided equally or randomly between the number of villages listed. The approach to the distribution of new dwellings within Policy CS2 is to be driven by the function of the villages, their role in the community, and the capacity for a particular level of growth which will be guided by many factors, which will result in a different level of development being identified as “appropriate” in different settlements, even those within the same category (see paragraph 7.3 in the Technical Background Document 2: Spatial Strategy – Version 1.1., this indicates that the Site Allocations document will also be informed by detailed assessments of a range of criteria). The approach will also provide for a degree of in-built flexibility within the catchment area.

The approach also relies on the concept that the villages do not exist in isolation and what is happening within other villages within the same functional cluster will also be important. The strategy recognises the role of the villages as a community and also the communities which exist in practice which usually go beyond parish or other boundaries. In all cases and of paramount importance will be to ensure that overall development throughout the plan period in any settlement is in scale with that settlement.

It will also be important to ensure that any development in the Core and Hinterland Villages is supported by an appropriate level of infrastructure. As with the larger strategic sites provision of adequate infrastructure to serve developments will be required. In many cases this may need to be by way of a financial contribution, secured through legal agreements under section 106 of the Town and Country Planning Act, and through a mechanism known as the Community Infrastructure Levy (CIL) which is anticipated to be established at a later date. One of the key benefits of the approach suggested will be to enable meaningful infrastructure improvements to support development in these areas, although contributions may need to accumulate over a number of years to achieve this. The approach to infrastructure delivery will also follow the functional cluster concept, to reflect the role and relationship between settlements, particularly when it comes to the use and demand for many of the facilities which make up the infrastructure. Policy CS17 reflects this. In the case of affordable housing the policy consideration for exception schemes will operate within the context of the functional clusters, thus enabling greater flexibility and increasing the opportunities to address local housing need in some of Babergh’s more rural areas. **In considering the cumulative impact, the findings from monitoring the impacts of previous planning applications in respect of the social, physical and environmental impacts and the effects on quality of life within the village will be considered and reflected in the assessment of new proposals.**

**The BUABs defined in the 2006 Local Plan and later in a future DPD for Site Allocations, provide a useful starting point when considering the relationship of proposed development in relation to the existing pattern of development for that settlement and for defining the extent of its developed area and a distinction between the built up area and the countryside. Policy CS6 intentionally provides greater flexibility for appropriate development beyond these, for identified Core and Hinterland villages subject to specified criteria.**

#### **Policy CS6: Strategy for Development for Core and Hinterland Villages**

**Proposals for development for Core Villages will be approved on sites allocated in the Site Allocations DPD, and elsewhere where proposals score positively when assessed against Policy CS10 and the following matters are addressed to the satisfaction of the local planning authority (or other decision**

maker) where relevant and appropriate to the scale and location of the proposal:

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

Development in Hinterland Villages will be approved where proposals are able to demonstrate a close functional relationship to the existing settlement on sites where the relevant issues listed above are addressed to the satisfaction of the local planning authority (or other decision maker) and where the proposed development:

- is well designed and appropriate in size / scale, layout and character to its setting and to the village,
- is adjacent or well related to the existing pattern of development for that settlement,
- meets a proven local need, such as affordable housing or targeted market housing identified in an adopted community local plan / neighbourhood plan,
- supports local services and/or creates or expands employment opportunities, and
- does not compromise the delivery of permitted or identified schemes in adopted community / village local plans within the same functional cluster.

The cumulative impact of development both within the Hinterland Village in which the development is proposed and within the functional cluster of villages in which it is located will be a material consideration when assessing such proposals.

All proposals for development in Hinterland Villages must demonstrate how they meet the criteria list above.

The Core and Hinterland Villages identified in the Spatial Strategy provide for the day-to-day needs of local communities, and facilities and services such as shops, post offices, pubs, petrol stations, community halls, etc that provide for the needs of local communities will be safeguarded.

New retail, leisure and community uses appropriate in scale and character to the role, function and appearance to their location will be encouraged in Core and Hinterland Villages, subject to other policies in the Core Strategy and Policies document, particularly Policy CS10, and other subsequent (adopted) documents as appropriate.

## 2.8.6 Rural Areas

A large proportion of the district is made up of rural areas with farmhouses, individual dwellings and small groups of cottages. Small groups of dwellings and hamlets will fall within functional clusters. However, their remoteness and lack of any services or facilities

mean that such groups and hamlets are classified as countryside. As such these are subject to a long established policy approach towards rural areas, which generally seeks to prevent development other than that required for agriculture and other essential operations that need to be located in the countryside. The changing nature of the rural economy has led to the need to provide a framework which allows for some economic diversification in rural areas. It is important to retain an appropriate balance and maintain adequate control to ensure the locally distinctive rural characteristics are not lost. Section 3 provides further policy guidance on the rural economy.

WORKING DRAFT

## **Section 3 – The Delivery of growth, provision of infrastructure and monitoring**

### **3.1 Sustainable Development**

#### **3.1.1 Introduction**

The planning system aims to ensure that the principles of sustainable development are followed so that growth and future development is sustainable over time. There are many definitions of “sustainable development” in use. For the United Kingdom, the Government published its Sustainable Development Strategy, “Securing the Future”, in 2005. This states that ‘the goal of Sustainable Development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations.’

The UK Sustainable Development Strategy sets out five guiding principles and four agreed priorities to deliver this goal:

##### The 5 Principles

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly

##### The 4 Priorities

- Sustainable consumption and production
- Climate change and energy
- Natural resource protection and environmental enhancement
- Sustainable communities

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.

### **3.2 Sustainability: The Babergh Approach and Interpretation**

Sustainable development principles combine the three dimensions or 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. 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). The three dimensions find expression within the Babergh Strategic Plan 2008-18; and for the Babergh area this will mean:

- Doing our best to protect and enhance the (natural and built) environment (expressed mainly by the identified Babergh theme of ‘A Greener and Cleaner Babergh’)

- Promoting a strong, diverse economy and prosperity (expressed mainly by the identified Babergh theme of 'A strong and sustainable Babergh economy')
- Maintaining the existing settlement pattern and that of a large number of distinct but interlinked communities (expressed mainly by the identified Babergh theme of 'Vibrant Places and Strong Communities')

This Core Strategy and Policies document (and 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, 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 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 and bats, and European sites (protected bird nesting sites) such as on the Stour and Orwell estuaries will be a major consideration in such cases. In addition, the attractions for the district for tourism, a key driver of the local economy, (inter alia) mean that maintaining its environmental qualities is essential.

The district's dispersed rural nature, with the range of difficult challenges that this presents, plus its relationship to nearby areas like Ipswich, mean that particular emphasis needs to be placed on promoting the strength of the economy, job creation / protection and prosperity. Finally, the settlement pattern (and dispersed rural nature) mean that protecting the many different identifiable communities, most of which are relatively small rural communities in villages, also has particular importance. This is reflected in such ways as our approach to promote the rural economy, provide maximum opportunities to deliver rural affordable housing and protect / promote rural facilities and services.

The policies that follow in this section address the key elements which will guide growth and development in Babergh. They include the context for environmental considerations including protection and mitigation; the contribution development may make to wider sustainable objectives such as addressing climate change; guidance relating to the scale, character and shape of development and requirements to ensure adequate infrastructure accompanies new development and enhancements and improvements are provided where needed. Essentially these policies provide more guidance about development and the considerations which will apply in integrating the components of sustainable development, balancing the interests of an appropriate level of growth and the characteristics of Babergh as we know it.

### **3.3 Environment, Climate Change and Green Infrastructure**

#### **3.3.1 Built and Natural Environment**

The Babergh District has a rich and varied built and natural environment. Important resources include the estuaries, the river valleys, Areas of Outstanding Natural Beauty, biodiversity and geodiversity sites and extensive open spaces and countryside, as well as heritage assets such as conservation areas and historic buildings, all of which contribute to the built and natural environment characteristics of the district, and all of which need protection and enhancement. As well as pressure from development, the built and natural environment must respond to pressures through measures such as prevention, management, mitigation or adaptation, from flood risk, coastal changes, pollution and climate change.

## Policy Context

The importance of the need to protect and enhance the built and natural environment has been widely acknowledged for a long time from an international to local level. As a result issues concerning the built and natural environment are thoroughly covered by legislation and policy guidance at all levels. This includes legislation at an international and national level and policies at national **and regional** level, the key elements of which are listed in the Environment and Climate Change Technical Background Document. The following paragraphs highlight locally important features essential to the context, history, character, appearance and future of the district, and policies for their protection.

### 3.3.2 Natural Environment and Biodiversity

Babergh has a rich natural heritage, and at the forefront of this are the Stour and Orwell Estuaries which are acknowledged as being of international importance through their designation as a Special Protection Area (SPA), and a Wetland of International Importance (Ramsar site). In addition, there are other European sites beyond the district which could be affected by inappropriate development within Babergh, particularly the Deben Estuary SPA and Ramsar site and Sandlings SPA, which fall within 20 km of the district boundary.

In order to ensure the protection of these European sites for generations to come, measures will be implemented to take account of the pressures of development which may arise from policies within the Babergh Local Plan. The main effect which could arise as a result of proposed development over the next 20 years is from increased population growth in the district, and the allocation of land for additional jobs and housing, which in turn may result in increased recreational pressures on the European sites through rises in visitor numbers. These sites support species which are susceptible to disturbance, and without appropriate measures in place there is a risk of degradation to these sites.

With this in mind Babergh will implement a series of measures to ensure that the policies contained within this document will not have a significant effect on the European sites. These measures will include the following:

- 1. Reducing / preventing an increase in recreational demand on the estuaries (from the resident population)** - steering the distribution of new housing away from the estuaries, and the provision of new Accessible Natural Green Space in new developments to reduce recreational demand on the estuaries (see Policies CS9 and CS10).
- 2. Monitoring Programme** - this will review and link into studies such as that being undertaken by the surrounding local authorities on the Deben Estuary; look to include baseline visitor surveys; and monitor the SPA / Ramsar site at a frequency to be agreed with Natural England and neighbouring Councils. Reporting on this monitoring plan will be tied in with the annual monitoring programme described under Policy CS18.
- 3. Planned Mitigation Measures** - if during the monitoring programme it is found that recreational pressure is increasing, then this will trigger the requirement to implement mitigation measures, **as required, to compensate for impacts identified.** This is especially important as the value of tourism and leisure visits to the area is very important to the local economy and will be encouraged but will be managed, and if necessary mitigated to ensure continuing protection/enhancement of the European sites.

In addition, with regard to the SPAs and Ramsar sites, any development proposal that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitat Regulations at Site Allocation and / or project application stage. The HRA for this Core

Strategy and Policies document does not obviate the need for such assessment. If it cannot be ascertained that there would be no adverse effects on site integrity the project will be refused unless it passes the tests in Regulation 62 (in which case any necessary compensatory measures will be secured in accordance with Regulation 66).

### **3.3.3 Landscape and Character**

In a district such as Babergh, future development must be managed to respect the key features and local distinctiveness. The approach cannot simply be that these areas should be “no go” areas for development (although this may be appropriate in some locations for some types of development). It is therefore helpful to understand why extensive areas of the district are worthy of protection under international and national legislation.

It is widely known that there are Areas of Outstanding Natural Beauty (AONB), Sites of Scientific Interest (SSSI) and Conservation Areas, for example, but less well known what makes these areas significant and worthy of protection. It is important to recognise these elements in order to balance interests and consider potential impacts in the future, as well as to identify any further management or guidance which may be required that goes beyond the boundaries of defined designations covered by legislation but that are important to the features the legislation seeks to safeguard. Furthermore, in cases where mitigation measures are necessary, it may help inform the type of measures which could be appropriate.

#### **Areas of Outstanding Natural Beauty**

One of the most precious natural assets in England is its landscape. Babergh makes a valuable and varied contribution to this. The Suffolk Coasts and Heaths AONB and Dedham Vale AONB including the Stour Valley cover a considerable part of the district. Legislation provides protection and guidance within these areas and both have Management Groups providing a robust framework for management of challenges facing these areas in the future. The Suffolk Coasts and Heaths AONB is a product of its underlying geology, shaped by the effects of the sea and the interaction of people with the landscape over time. The Shotley peninsula is made up of varied landscape types which contribute to the overall mosaic of the AONB, the main types within the Babergh Area are:

- Coastal Levels;
- Estate Farmlands; and
- Valley Meadowlands.

At the heart of the Dedham Vale AONB and Stour Valley is the area known as “Constable Country” centred on villages including Dedham, Flatford and East Bergholt. John Constable’s famous paintings of this landscape influenced the national designation as an AONB which is now widely recognised as typifying lowland English countryside. Key features within the landscape in this area which are significant include; the meandering river and its tributaries, gentle valley slopes with scattered woodlands, grazing and water meadows, sunken rural lanes, historic villages with imposing church towers and historic timber framed buildings, small fields enclosed by ancient hedgerows and a wealth of evidence of human settlement over centuries. The Stour Valley is predominantly rural with a medieval settlement pattern. Woodlands are situated within the tributary valleys and much of the valley floor comprises arable crops, with the exception of the areas such as Sudbury Common Lands.

#### **Suffolk Landscape Character Assessment**

The whole district including the wider landscape beyond these designated areas has been defined with an appropriate landscape character type. The Suffolk Landscape Character Assessment is a web-based resource designed to support the maintenance and restoration

of the landscape through the planning process ([www.suffolklandscape.org.uk](http://www.suffolklandscape.org.uk)). It also promotes a wider understanding of the landscapes of Suffolk. The landscape character types prominent in the Babergh District include:

- Rolling Estate Farmlands (Much of the west of the district and large parts of the Shotley Peninsula)
- Plateau Farmlands (North of the Stour Estuary)
- Valley Meadowlands (The river valleys)
- Ancient Plateau claylands (around Hadleigh)
- Ancient Estate claylands (around Hadleigh)
- Ancient Rolling Farmlands and Rolling Valley Farmlands (Around Sudbury and parts of the Shotley Peninsula)

More information on the features of each of these landscape types and background guidance can be found on the Suffolk County Council landscape web site.

### **Special Landscape Areas**

The adopted Babergh Local Plan (2006) designates significant areas of the district's landscape as 'Special Landscape Areas', particularly the river valleys. Given the status of these as a local level designation and as an inherently site specific matter, it is not considered appropriate for these to be addressed within the Core Strategy and Policies document. Adopted and saved Local Plan Policy CR04 therefore remains extant at this point in time. A review of the SLA approach, including whether to retain this designation and if so which areas should be covered, will be dealt with in the subsequent Site Allocations or Development Management Policies document.

The make-up of the landscape is intrinsically linked to the geology and geomorphology of the area. GeoSuffolk maintains a Geodiversity Action Plan which can provide more detail on the geological features. The district has an important geological heritage especially with features from the Cretaceous, Palaeocene, and Pleistocene periods. Much of its landscape character is due to glacial boulder clay of Anglian Till, laid down in Pleistocene times. Key geological features include:

- Cretaceous Chalk outcrops (westerly areas and river valleys);
- Sandy Soils Pliocene Red Crag;
- Significant evidence of sites of early human settlement 200,000+ years ago at Harkstead and Lavenham;
- Natural lakes (Cornard Mere and Dodnash Pond).

The landscape and geology of the area together strongly influence the biodiversity of species which are present, based on the habitats that these landscapes create. The Suffolk Biodiversity Group maintain details on all habitats and species, some of those significant to Babergh are indicated below:

- Ancient Woodland;
- Ancient Hedgerows (species rich);
- Lowland hay meadows;
- Farmland pond;
- Grazing marsh;
- Cereal field margins;
- Stour and Orwell inter-tidal mudflats and salt marsh (the habitat for wildfowl and water fowl)

Many of these areas of habitat are also designated as SSSIs, landscape designations or international sites such as the mudflats and salt marshes of the Stour and Orwell Estuaries. However some of these habitats will inevitably fall outside a specific boundary or

designation, but nevertheless serve an important function, and consideration will need to be given to the need for management of such areas.

### **3.3.4 Strategy for Environmental Enhancement**

**Opportunities to enhance the rich and varied environmental resource in Babergh which comprises; the estuaries, river valleys, AONBs, biodiversity and Geodiversity areas, open spaces, countryside, heritage assets, conservation areas and historic buildings will be positively encouraged.**

- New provision of Accessible Natural Green space will be a core focus to the design and layout of development at the urban extensions, and other large sites.
- Developer contributions will be directed to provision of new areas of open space where needed and also to enhance existing areas or improve the links between existing spaces to enhance the function and attractiveness of some sites or areas of the countryside.
- All new development will be expected to ensure its design, character and scale complements its location and as such will be required to include adequate open space, landscaping and biodiversity elements which will enhance the existing and surrounding environment.
- Open space / landscape schemes will be encouraged to reflect locally distinctive landscape character and opportunities to enhance these features will be promoted.
- Opportunities will be encouraged to enhance specific habitats, particularly where wildlife / nature conservation organisations advise a need exists for enhancement or creation of a particular habitat, through landscape schemes of open space / green infrastructure provision associated with new development.
- Continued support for existing countryside management groups (including the Suffolk Coasts and Heaths and Dedham Vale AONBs) to conserve and enhance the nationally protected AONBs through implementation of AONB management plans for proactive enhancement of the environment in these areas.
- Other local or community initiatives which contribute to environmental enhancement, even on a small scale, will be encouraged, including for example, Wildlife Trust, community groups / parish town councils litter picks / tree planting.

### **3.3.5 Historic Environment**

A key element to achieving sustainable development is good and appropriate design with the overall objective being that it contributes positively to making places better for people. Design is about more than aesthetics of a development, but also ensuring usable, durable places. The underlying principles which contribute to good and successful design are reflected in Policy CS10 and Policies CS3-6.

English Heritage maintains the register of listed buildings, of which there is a wealth in Babergh - both in the historic towns and villages and throughout the rural areas. Often, sufficient protection is offered to listed buildings through legislation, but careful consideration of the character of other, unlisted, historic assets is also important.

There are 29 Conservation Areas in the District, 19 of which have detailed Conservation Area Appraisals providing considerable background and context offering helpful guidance. A further programme of Conservation Area Appraisals continues to progress.

Building on the wealth of legislation, Policy CS10 addresses the locally distinctive characteristics which new development needs to respect. This will enable careful management of the rich resource, whilst allowing for an appropriate level of growth. The “mixed and balanced community” approach, which underpins the future shape of Babergh, includes the need to balance the needs of the community with the character, history and appearance of the environment. These are the qualities that local communities identify as

being important to and often the very reason for living or working in that area or which attracts visitors.

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.

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).

### **3.3.6 Strategy for the Conservation and Enjoyment of the Historic Environment**

**To continue to conserve and enhance the heritage assets throughout the district for the benefit of all to enjoy and to enrich the quality of life and learn from local knowledge and understanding of the past through these assets and ensure they are safeguarded for future generations to enjoy and learn from.**

- Continue to support the conservation, repair and enhancement of historic assets through advice from the Council's Planning Service. (Shared resource with adjoining authority).
- 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.
- 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 10 remaining Conservation Areas.
- Provide support and guidance to ensure that the design of any development which may affect historic assets is of high quality, and ensure new development makes a positive contribution to local character and distinctiveness.
- Encourage enjoyment of the heritage assets through encouraging promotion of locations with a rich historic environment by organisations or communities with an interest in the heritage assets. In association with this promotion, also encourage the preparation of interpretive information about the assets to share knowledge and understanding of the past. Manage the interest in these heritage rich locations to ensure benefits to the local economy are maximised, whilst balanced with the environmental value.

### **3.3.7 Climate Change**

Elements of Babergh's natural environment such as the coastline, estuaries and rivers, are particularly susceptible to climate change and the consequential impacts have the potential to change the landscape of Babergh and the lives of its residents.

Babergh's Core Strategy and Policies document aims to strike a balance so that growth and development are sustainable. The task is to provide new homes and businesses in an area of nationally (and locally) protected landscapes, with a protected bio-diverse coastline, and existing historic towns and villages in its river valleys and diverse and attractive countryside. It is essential therefore that planning policy both protects the character and

appearance of the Babergh area, and promotes ways of reducing carbon emissions and good practice in sustainable design.

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.

Policies CS7 and CS10 set out a framework of criteria for sustainable development, the energy needs of new development and how the provision of renewable energy either on-site, or through community schemes (where viable and appropriate) can be encouraged through larger scale generation of renewable energy.

Large new developments may create economies of scale that may provide the potential for achieving lower level/zero carbon homes and non-residential development in advance of changes to the Building Regulations, and ways of providing energy from renewable sources to satisfy the predicted need of the proposed development. Indeed, in some cases it may be possible to provide surplus renewable energy to existing communities.

Studies have been and are being carried out that will inform site selection considerations, such as the Water Cycle Studies (one for the Haven Gateway area undertaken with partners, and one for the remainder of the District) and the Environment Agency's Essex and South Suffolk Shoreline Management Plan. Water efficiency and the reduction in water usage is a high priority for sustainable development and all new development will be expected to include demand management measures designed to reduce the impact of new and existing development on the water resources in Babergh district.

Opportunities to improve water quality in all watercourses and water bodies will be taken where possible and measures will be taken to prevent the deterioration in current water quality standards. 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 Development Plans Documents (DPDs).

One of the most significant contributors to CO<sub>2</sub> emissions is the use of cars and part of achieving sustainable development by design is how we address this issue. In a rural area such as Babergh it is difficult to achieve a reduction in car travel, as for many people in small villages and scattered hamlets public transport will not replace the need to own and run a car. However, we can help reduce the need to travel by ensuring new development is carefully planned to provide opportunities for work and leisure etc. close to new homes. This is a key principle of our Development Strategy where our preferred options are to focus new development in the towns, Ipswich urban fringe and Core Villages. The Council will also require Travel Plans for larger new developments, and will support local agriculture and the reduction of 'food miles' by enabling the provision of local farmers' markets and similar initiatives.

The rural road network and local transport system are part of the way of life in the Suffolk countryside, and access is a key consideration when considering proposals for new development. For many people car ownership is essential due to the rural nature of the area and poor or infrequent bus services. It is therefore important that development that generates significant demands for travel, including leisure uses and visitor attractions, should be located in areas well served by a variety of transport modes, and all new development should aim to minimise the need to travel by car.

In addition to the studies referred to, and the new policy directions in this Core Strategy and Policies document, work continues with Suffolk County Council's 'Greenest County' initiative; areas in the Babergh Ipswich Fringe are being assessed for suitability for the

potential location of wind turbines; and Babergh is a joint recipient benefitting from the Climate Change Skills Fund to trial a Shared Sustainability Support Officer to help applications involving renewable / low carbon technologies through the Planning process.

In the future other areas to be explored may include:

- Thermal / heat mapping;
- assessing the Babergh area for opportunities for decentralised energy to meet the needs of new development, 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;
- greater integration of waste management;
- exploring the potential in new developments to co-locate heat suppliers and consumers;
- identifying areas suitable for renewable energy generation;
- exploring the potential to involve developers, businesses and communities in increasing the use and supply of renewable and low-carbon energy supplies; and
- considering how green infrastructure can be used to assist in reducing the impacts of climate change e.g. flood water storage areas, sustainable drainage systems, urban cooling and local access to shady outdoor space.

Where appropriate we will work with partners to carry out further studies and assessments (including viability assessments). Following collection of this evidence detailed policies will be included in the Site Allocations / Development Management DPD(s).

The construction industry and Government bodies and organisations are working toward achieving zero carbon new homes, and standards have evolved that will help achieve this goal. 'Building for Life' is the national standard for well-designed homes and neighbourhoods developed by a partnership of Design Council CABE, the Home Builders Federation and Design for Homes. Building for Life assessment is a toolkit based on 20 criteria set out as a series of 20 questions which are used to evaluate the quality of new housing developments under the headings: environment and community, character, streets, parking and pedestrianisation, and design and construction. Along with many other local authorities, Babergh will use the Building for Life standards to assess proposals for new homes. Non-residential developments will be expected to use the Building Research Establishment Environmental Assessment Method (BREEAM), an internationally recognised environmental assessment method and rating system.

Large scale non-residential development proposals will be expected to provide evidence of BREEAM pre-assessment at the pre-application stage. More detailed policies on design standards will be included in the Development Management DPD. There is an expectation that minimum standards will ~~be improved on~~ progressively improve over time such that non-residential developments should aim to increase design standards to achieve ~~BREEAM Excellent in 2013 rising to~~ BREEAM "Outstanding" standard or equivalent in 2016.

#### **Policy CS7: Sustainable Design and Construction Standards**

**Larger scale residential developments, particularly those within the New Directions of Growth Strategic Allocations and Broad Location for growth, will be expected to achieve the Building For Life Silver Standard. In other cases (e.g. in some of the Core Villages), and where the Council consider it is viable to do so, sites where this standard can be achieved will be identified in the Site Allocations DPD.**

**All new non-residential developments will be expected to achieve, as a minimum, the BREEAM “Very Good” “Excellent” standard or equivalent.**

**The Council will seek opportunities to identify sites where these standards can be achieved or exceeded, and will identify such sites in the Site Specific Allocations DPD where it is viable to require this as part of the overall scheme,**

**Note 1:** 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 / Development Management DPD(s). This will include guidance on the size/scale of development that relevant policies apply to, and a timetable setting out which level of the Code for Sustainable Homes (or equivalent replacement standard) the development is expected to achieve..

**Note 2:** The local planning authority will determine which residential developments are considered to be “larger scale” (as a guide these are likely to be larger than ‘major’ development as currently defined, but will be assessed with regard to the locality and context of the proposal).

**Note 3:** This policy should be read in conjunction with Policy CS10 (including Note 3),

### 3.3.8 Renewable and Low Carbon Energy

Planning for climate change in the future is only part of the picture. At the other end of the scale are existing buildings. The character of Babergh district is enriched by the number of listed buildings and conservation areas, and we should not overlook the need for heritage assets to contribute to adapting to climate change and reducing carbon emissions. The re-use of an existing building is a very sustainable form of development minimising waste, and often listed buildings are constructed from sustainable materials. Some perform well in terms of heat loss/solar gain, and thermal insulation. However, many will require modification and adaptation to improve energy efficiency and resilience to climate change. In such cases the Council will carefully weigh the potential harm to the heritage asset and character of the locality against the public benefit of mitigating the effects of climate change in accordance with Government policy (set out in the National Planning Policy Framework). We will consider available evidence and assess the need to address this matter in criteria-based policies for Babergh’s heritage assets in the Development Management DPD.

Clearly the majority of housing, business premises and community facilities in the district are already built, and although the technology, materials and regulations exist to ensure that new development addresses climate change issues it is important that we don’t only focus on this area. Part of the Babergh approach to carbon reduction is non-spatial through funding and enabling the upgrading of the existing housing stock.

An approach that is particularly useful in considering action in the existing housing stock is to start with the energy hierarchy. This takes a pragmatic approach looking firstly at low cost, energy saving options and only when the simpler and more cost effective options have been explored considering high impact, high cost, energy-generating options. The first, step in the hierarchy is simple: to reduce the need for energy (which could be simply wearing an extra layer and turning the heating down, and turning off radiators in unused rooms); the second step is an area where many actions exist that cost very little or nothing at all: from closing curtains and doors, to installing insulation, secondary glazing and / or an energy efficient boiler; and the third and more expensive step would be to switch to low carbon or renewable energy such as installing solar thermal or photovoltaic panels, or a wood burner, or ground source heat pump (depending on individual and local circumstances). Owners and occupiers of the existing housing stock in Babergh, including historic buildings, can take steps in the energy hierarchy to improve energy efficiency in the district, and the Council will promote and encourage this through various initiatives and working with other authorities and organisations.

There may be opportunities for new development to share sources of renewable energy, particularly with community buildings, and/or to combine with existing residents, businesses, health, or education establishments in producing Travel Plans. Much can be done to reduce carbon emissions and reduce demand for energy and water by retro-fitting energy saving materials and equipment to existing buildings – this will also have the effect of making savings for the residents and users of these buildings.

Planning regulations are reviewed at national level on a regular basis, and regulations are being introduced or changed to allow many of these types of schemes to go ahead without express consent. Given the high proportion of existing homes that need to be upgraded the Council will consider the most cost effective ways of promoting and assisting with this and, if necessary and appropriate, policies for retro-fitting micro-renewable energy equipment to buildings will be included in the Development Management DPD.

## Climate Change Strategy

**Climate change can be tackled in various ways, and together with other actions the policies CS7 to CS10 in this Core Strategy and Policies document provide a comprehensive Climate Change Strategy to:**

- promote a reduction in carbon emissions;
- encourage and promote the use of renewable and low carbon energy sources through planning policies and best practice in areas such as retro-fitting existing buildings, and micro-generation;
- support for community initiatives for renewable and low carbon energy;
- provide, link to existing, and design new large-scale development around green infrastructure;
- minimise waste;
- minimise the risk of flooding and surface water run-off; and
- minimise the need to travel.

As part of this strategy the Council will also

- encourage existing and new businesses to locate and grow to meet the demand for products throughout the supply chain to serve the renewable / low carbon energy industry in Suffolk and north Essex; and
- continue to work with neighbouring authorities, the industry, developers and communities to research and support opportunities for the development and use of renewable and low-carbon energy.

### **Policy CS8: Renewable / Low Carbon Energy**

**All new development will be required to minimise dependence on fossil fuels and make the fullest contribution to the mitigation of climate change through adopting a sustainable approach to energy use.**

**Development within the ~~New Directions of Growth~~ Strategic Allocations and Broad Location for growth and other large-scale development proposals will be required to use on-site renewable, decentralised, or low carbon energy sources with the aim of achieving a 10% reduction in the predicted carbon dioxide emissions of the development.**

**In other cases the Council will support proposals for development that includes on-site low and zero carbon technologies including, where appropriate, proposals to retro-fit existing buildings as part of schemes to extend or convert those buildings.**

~~Opportunities for incorporating renewable / low carbon energy provision into new development, and/or producing renewal/low carbon energy may be identified in the Site Allocations DPD.~~

In all cases, the Council will encourage and support community initiatives, including linking with / contributing to the provision of local off-site renewable energy sources and the use of energy service companies (ESCOs) or similar energy saving initiatives.

~~Note 1: Development such as wind turbines~~ Renewable energy proposals, including but not limited to wind turbines will not automatically be viewed as sustainable sources of renewable energy, as in unsuitable locations they can result in increases in mortality among birds and bats. The impacts on receptors such as European sites will need to be considered for each individual allocation or scheme proposal. Other considerations such as the impact of proposals on landscape, heritage assets and human health and well-being will also be relevant to assessing the suitability of proposals for renewable energy schemes.

~~Note 2: The Development Management and Site Allocations Future~~ DPDs will contain more detailed policies which are likely to include site specific requirements in respect of renewable energy, and the submission of Energy Statements to demonstrate that the requirements of Policy CS8 and other relevant policies have been met. ~~In addition, the Council intends to produce further guidance on how to interpret the 10% carbon dioxide reduction requirement.~~ For the time being, the 10% reduction should be calculated as the maximum level carbon dioxide emissions (or "Target Emissions Rate") permitted under the Building Regulations Part L at the time of submission. Following the adoption of zero carbon standards (however they are ultimately defined) under Part L, the reduction should be calculated from the predicted carbon dioxide emissions after the application of energy efficiency measures that meet or exceed the minimum Fabric Energy Efficiency Standards set out within Part L.

~~Note 3: The local planning authority will determine which development proposals are considered to be "large-scale"~~ (as a guide these are likely to be larger than 'major' development as currently defined, but will be assessed with regard to the locality and context of the proposal).

### 3.3.9 Green Infrastructure

Green Infrastructure is the network of multi-functional greenspace such as natural landscape features, open spaces and corridors between built up areas. They are critical to the character of an area and make a positive contribution to health and well-being of a local community, visual amenity of an area, recreation opportunities for all, wildlife habitats and cultural heritage. In addition Green Infrastructure can establish benefits which help to mitigate the impacts of climate change. Green Infrastructure also plays an important role when associated with new development. Such development may place a threat to other existing, more sensitive locations from increased numbers of visitors, as a direct result of the increase in the population arising from a particular development. A case in point where this may be an important consideration here is the Ipswich Fringe. The proximity of the Ipswich urban fringe to the Stour and Orwell estuaries and the Special Protection Areas that cover the areas around them could be a potential concern if sufficient management of alternative recreational opportunities through a strong emphasis on Green Infrastructure is not integral to the shape and design of any development in this area. The area policy CS5 for the new direction of growth in the Ipswich fringe provides further policy guidance in this respect.

A good network of multi-functional green infrastructure within and between urban and rural areas should aim to achieve the following;

- Create links which connect existing spaces to each other especially close to areas where people live and work;

- Contribute to habitat connectivity and to habitat creation, protection and enhancement;
- Assist in adapting to climate change and contribute towards mitigating climate change;
- Promote healthy living by providing opportunities for exercise;
- Improve access and recreation opportunities including providing alternative locations away from more sensitive locations;
- Enhance links from urban areas to the countryside
- Enhance the character and local distinctiveness of the landscape.
- Make a positive contribution to creating a sense of place especially within large new developments including the strategic sites. Use green infrastructure opportunities to inform the shape and character of development and ensure the design reflects this. Green field sites and those within or close to sensitive landscapes will be particularly important, including the strategic site at the Ipswich fringe.

#### **Policy CS9: Green Infrastructure**

**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 appropriate to the scale and nature of the proposal. 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.**

**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.**

**Note:** The local planning authority will determine which development proposals are considered to be on "larger sites".

### **3.3.10 Enhancing Quality and Ensuring Sustainability**

Development at any scale has an effect on the lives of people who live or work in or near to it. Whether the new development is a shop-front, a factory, a farm building or hundreds of new homes it has a part to play in contributing positively to achieving the objectives of the Babergh Local Plan. Good design is important to people, and essential if new development is to be successfully assimilated in the district.

The impact of new development goes beyond appearance, and it is important that it is designed to respect the environment, make the best use of scarce resources, ensure sufficient infrastructure is available or provided, and contribute positively to and to cope with the effects of climate change.

### **3.3.11 Brownfield Land: Babergh's Approach**

Brownfield land is in short supply in this district, and what is available is often subject to competing pressures from housing and employment development. It is important as a general (but often crude) principle that the use of brownfield land is prioritised. However, although land is largely a finite resource, the level of brownfield land re-use is not considered a very good indicator in itself of sustainable development. This is partly

because brownfield land targets, especially when afforded undue weight for residential development in planning decisions, can result in inappropriate uses of sites or displacement of existing uses, including existing beneficial uses. Further, the most suitable use of a site in planning terms may be precluded and sometimes an inappropriate use of a site altogether can result. These types of scenarios can often be both contrary to sustainable development principles and militate against the creation of quality developments and environments.

For such reasons, our approach is:

- for the preference for redeveloping brownfield land over greenfield land to apply equally to all forms of development, not just residential development, since it is irrational to apply it only to residential development;
- to attach greater weight to ensuring sustainable developments, quality and good design, and less weight to the priority of the re-use of brownfield land in considering proposals for development.

Babergh's circumstances, evidence and priorities suggest that 45% would be a locally appropriate brownfield land re-use target. This would be in line with the target level that has been used as a local Babergh performance indicator.

#### ***Brownfield Land: Re-use Target***

***Babergh will monitor development performance in relation to brownfield land re-use against an overall land re-use target of 45%. This will apply as an overall target for all forms of development (not just residential development) which will all be treated the same in relation to this consideration.***

*The District Council does not consider that the achievement or otherwise of such a 'target' as this should be treated as a material consideration in the determination of planning applications or other planning decisions.*

The Sustainability, Climate Change and Environment Background Paper includes further detail on this.

### **Efficient Use of Land and Development Density**

The Council supports the need to make efficient and effective use of both brownfield and greenfield land and recognises that higher density developments need not be harmful or unacceptable for development schemes, provided good quality design is used. Whilst having due regard to context, existing character and development density need not necessarily be replicated. The subsequent Development Management and Site Specifics documents will provide development density ranges appropriate to localities and different types of locations, through engagement with the local community and consideration of local context, and having regard to wider sustainability considerations.

### **Strategic Developments**

Strategic and other large new development proposals will be required to be the subject of prior consultation with the local community, and this is best achieved through an iterative process of masterplanning. Initial discussion and consultation with local communities and with the local planning authority may be through Development Briefs leading to an approved masterplan submitted with the planning application.

A masterplan must be a comprehensive design strategy for the whole scheme over the lifetime of its development. Within the boundaries of the proposed development area it will define neighbourhoods and development parcels and their phasing, including any growth envisaged beyond the plan period. It should set design principles and specify design features and matters such as materials, height, layout, density, mix of uses, and

demonstrate how local distinctiveness is achieved throughout all elements of the development. A masterplan should show green infrastructure and links, major landscaping and open space proposals to assimilate new development into the landscape and the creation of new habitats, and a bio-diversity plan, including species and habitat protection, mitigation, compensation and new habitat creation measures for sustainability.

A masterplan is also the vehicle for showing the range and mix of housing types and the level of affordable housing provision and the density of housing / mix of uses for each neighbourhood. The location and design principles of employment sites and any social and community infrastructure provision should also be shown.

Measures to promote healthy living and sustainable living patterns should be outlined, including development of Travel Plans where appropriate. Pedestrian and cycle links are very important in new developments, providing opportunities for regular exercise as well as safe routes to work, school and community facilities. These are particularly important 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.

Specific requirements that should be addressed in masterplans will be identified in the Site Allocations DPD, and guidance on matters to be included in the Development Management DPD.

A key element to achieving sustainable development is good and appropriate design with the overall objective being that it contributes positively to making places better for people. Design is about more than aesthetics of a development, but also ensuring usable durable places. The underlying principles which contribute to good and successful design are outlined in the NPPF and reflected in Policy CS10 and Policies CS3-6. Further detail or criteria for achieving high quality design will be set out in subsequent Development Plan Documents.

The following policy brings together the elements of sustainable development and the principles of good design. The principles behind the policy are relevant to all new development whether large or small, whether it is a domestic extension or a new supermarket, urban or rural, business or residential. As such it will be applied in a proportionate way depending on the scale and exact nature of the proposal.

#### **Policy CS10: Implementing Sustainable Development in Babergh**

**Proposals for development must respect the local context and character of the different parts of the district, and where relevant should demonstrate how the proposal addresses the key issues and contributes to meeting the objectives of the this Local Plan. All new development within the district, will be required to demonstrate the principles of sustainable development and will be assessed against the presumption in favour of sustainable development – as interpreted and applied locally to the Babergh context (through the policies and proposals of this Local Plan), and in particular, and where appropriate to the scale and nature of the proposal, should:**

- **respect the landscape, landscape features, streetscape / townscape, historic heritage assets, important spaces and historic views;**
- **make a positive contribution to the local character, shape and scale of the area;**
- **protect or create jobs and sites to strengthen or diversify the local**

economy particularly through the potential for new employment in higher skilled occupations to help to reduce the level of out-commuting, and raise workforce skills and incomes;

- ensure an appropriate level of services, facilities and infrastructure are available or provided to serve the proposed development;
- retain, protect or enhance local services and facilities and rural communities;
- consider the aspirations and level and range of support required to address deprivation, access to services, and the wider needs of an aging population and also those of smaller rural communities;
- protect and enhance biodiversity, prioritise the use of brownfield land for development ensuring any risk of contamination is identified and adequately managed, and make efficient use of greenfield land and scarce resources;
- address climate change through design, adaptation, mitigation and by incorporating or producing sources of renewable or low-carbon energy;
- make provision for open space, amenity, leisure and play through providing, enhancing and contributing to the green infrastructure of the district;
- create green spaces and / or extend existing green infrastructure to provide opportunities for exercise and access to shady outdoor space within new developments, and increase the connectivity of habitats and the enhancement of biodiversity, and mitigate some of the impacts of climate change e.g. enhancement of natural cooling and reduction in the heat island effect, provision of pollution sequestration for the absorption of greenhouse gases, and through the design and incorporation of flood water storage areas, sustainable drainage systems (SUDs);
- minimise the exposure of people and property to the risks of all sources of flooding by taking a sequential risk-based approach to development, and where appropriate, reduce overall flood risk and incorporate measures to manage and mitigate flood risk;
- minimise surface water run-off and incorporate sustainable drainage systems (SUDs) where appropriate;
- minimise the demand for potable water in line with, or improving on government targets, and ensure there is no deterioration of the status of the water environment in terms of water quality, water quantity and physical characteristics
- minimise waste (including waste water) during construction, and promote and provide for the reduction, re-use and recycling of all types of waste from the completed development;
- minimise the energy demand of the site through appropriate layout and orientation (passive design) and the use of building methods, materials and construction techniques that optimise energy efficiency and are resilient to climate change (e.g. resilience to high winds and driving rain);
- promote healthy living and be accessible to people of all abilities including those with mobility impairments;
- protect air quality and ensure the implementation of the Cross Street (Sudbury) Air Quality Action Plan is not compromised
- seek to minimise the need to travel by car using the following hierarchy: walking, cycling, public transport, commercial vehicles and cars) thus improving air quality; and
- where appropriate to the scale of the proposal, provide a transport assessment /Travel Plan showing how car based travel to and from the site

can be minimised, and proposals for the provision of infrastructure and opportunities for electric, plug-in hybrid vehicles, and car sharing schemes.

The production of development briefs/masterplans will be required where proposals warrant such an approach owing to the scale, location or mix of uses. A landscape/townscape appraisal, energy strategy, multifunctional green infrastructure strategy and design and a design concept statement will be essential components of development briefs and masterplans, alongside the sustainability assessments required in Policy CS7.

Proposals for development must ensure adequate protection, enhancement, compensation and / or mitigation, as appropriate are given to distinctive local features which characterise the landscape and heritage assets of Babergh's built and natural environment within designated sites covered by statutory legislation, such as ASONB, Conservation Areas, etc. and local designations such as Special Landscape Areas and County Wildlife Sites, and also local features and habitats that fall outside these identified areas. In particular proposals should protect and where possible enhance the landscape and heritage areas including habitats and features of landscape, historic, architectural, archaeological, biological, hydrological and geological interest. Adaptation or mitigation will be required if evidence indicates there will be damaging impacts if a proposal is otherwise acceptable and granted planning permission.

With regard to the SPAs, **SACs** and Ramsar sites any development that would have an adverse effect on the integrity of a European site **including candidate / proposed sites** either alone or in combination with other plans or projects will be refused (see Note 2).

**Note 1:** Mitigation, adaptation and enhancement will need to reflect the existing landscape character and / or historic pattern / characteristics and provide relevant features appropriate to the specific area / location including habitat type, respecting the biodiversity, geodiversity or historic character of the location affected. Biodiversity in this context includes, but is not limited to, legally protected sites.

**Note 2:** that is unless the project passes the tests in Regulation 62 of The Conservation of Habitats and Species Regulations 2010 as referred to above. **Any development proposal that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitat Regulations at Site Allocation and/or project application stage. The HRA for this Core Strategy does not obviate the need for such an assessment. If it cannot be ascertained that there would be no adverse effects on site integrity the project will be refused unless it passes the tests in Regulation 62, in which case any necessary compensatory measures will need to be secured in accordance with Regulation 66. Any development that would have an adverse effect on the integrity of a European site, either alone or in combination with other plans or projects would not be in accordance with the Core Strategy.**

**Note 3:** The Development Management and Site Allocations DPDs will contain more detailed policies which are likely to include site specific requirements in respect of sustainable design and development (including Code for Sustainable Homes levels [or equivalent replacement standard]), and the submission of Sustainability Statements to demonstrate that the requirements of Policy CS10 and other relevant policies have been met.

### 3.4 Mixed and Balanced Communities

The Babergh District and beyond is made up of many communities. The aim is to retain those existing mixed and balanced communities and ensure that development sustains and enhances them. A successful community is one which is mixed and balanced in the

broadest sense. This mix includes not only a mix of uses, including homes, jobs and facilities, but also a mix of people. Planning is at the heart of this by enabling an appropriate mix of homes to attract families and individuals from a variety of backgrounds, of various sizes and with a range of social and economic demands. The thrust of the Plan is underpinned by the presence of mixed and balanced communities, recognising that in the rural areas, these communities stretch beyond individual towns and villages and also include a more extensive hinterland.

It is important that opportunities are created to provide economic choices and to offer the option to live close to where people work wherever possible or desirable. The range of homes available also needs to reflect the varying needs of the community, and offer housing size and types which reflect needs at any given time. Affordability of homes is a key issue in Babergh which can be helped by the policy approach towards affordable housing and also guiding an appropriate mix and type of housing. Social provision and infrastructure again has varied demands from different groups within the community. It is important to ensure opportunities cater for the range of backgrounds within a community and that infrastructure provided reflects the capacity, and is related to the needs and demands of, the community using or benefiting from that infrastructure.

Although it is important that new development is balanced with the character of the existing community and the environment, it can offer benefits which help maintain and support mixed and balanced communities, for example, by sustaining facilities at the heart of the community such as primary schools, convenience shops / post offices and Doctor Surgeries. However new development must ensure it respects the design, character and shape of the existing community.

#### **3.4.1 The Local Economy – Planning for New Jobs**

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

Economic activity rates in Babergh are noticeably higher than national or regional levels, and unemployment levels are lower. The District compares favourably with the wider region in terms of level of highly qualified inhabitants, but is still below the national average. In terms of weekly earnings Babergh is considerably below county, regional and national levels. In 2001 Babergh had the (joint) largest proportion of out-commuting out of all Suffolk's districts with 43% of its employed population working outside of the district.

The attractive landscape, estuaries, and coastline, and the historic towns and villages in the district form the base of an important cultural and historic leisure and tourism sector. Businesses in this sector are important contributors to the local economy and include leisure activities that attract spending all year round from people within the district and the immediate area, to the more conventional tourism associated with people visiting from outside the region on day trips, taking short breaks, and longer summer holidays.

#### **3.4.2 Town and Village Centres**

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, there is an allocation from the 2006 Local

Plan for a supermarket, and the town has an important role as a tourism and visitor destination.

The Core Villages provide local shops, services and community facilities and many of these villages also attract visitors and tourists and provide employment in specialist shops, pubs, hotels and restaurants. This additional 'layer' of economic activity undoubtedly contributes to the vitality and viability of these villages. In the towns and urban areas, particularly Sudbury and Great Cornard and Pinewood in the Babergh urban area on the fringe of Ipswich, local centres provide much needed shops and services, and where these urban edges are expanding these local centres are an essential part of local infrastructure.

This hierarchy of centres within Babergh is part of a wider regional and sub-regional hierarchy, in particular Ipswich, Colchester and Bury St Edmunds, and higher order centres at Norwich, Cambridge and London.

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.

The centres of the towns, particularly Sudbury, provide the potential for a diverse range of evening and night-time uses such as cinemas, theatres, restaurants, public houses, bars, nightclubs and cafes appropriate for local leisure and cultural activities and in enhancing the tourism 'offer' of the Babergh area. Such evening uses must be appropriate to their location and appeal to a wide range of age and social groups.

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.

#### **Policy CS11: Town, Village and Local Centres**

**Retail, leisure, tourism, cultural and office development will continue to be focussed in Sudbury and Hadleigh, and in village and local centres at an appropriate scale and character for the location, and in new local centres located in the New Directions of Growth.**

**New retail, leisure and similar service uses, including evening and night-time uses, will be assessed for potential impact, including cumulative impact, on the character and function of the centre / area, anti-social behaviour and crime, including considering security issues raised by crowded places, and the amenities of nearby residents, as well as on the vitality and viability of existing centres.**

**The Council will make provision for up to 11 000 square metres of comparison retail goods by 2021 in Sudbury. This will be based on the sequential approach.**

**An extension in size or intensification of retail uses in the Babergh Ipswich Fringe adjacent to the A14 / A12 / A1214 Copdock interchange will not be supported, to protect the town centre vitality and viability of Ipswich and Hadleigh, and the protection and provision of local facilities within residential neighbourhoods on the edge of Ipswich.**

**Implementation and Delivery:**

**A Local Plan / DPD will facilitate the allocation of the comparison goods retail floorspace in Sudbury. The DPD is programmed for adoption by 2017. Progress on the DPD and the allocation will be closely monitored and reviewed as follows:**

- i) 2017: review progress of Local Plan/ DPD**
- ii) 2020: review progress of delivery of retail allocation**

### **3.4.3 Local Economic Strategy**

#### **Policy Context**

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.

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:

- plan proactively to meet the needs of business;
- recognise and seek to address barriers to investment;
- set out a clear economic vision and strategy for the area;
- set criteria or identify strategic sites for local and inward investment
- support existing business sectors and where possible identify and plan for new or emerging sectors;
- plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries; and
- facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

National policy recognises that town centres are important to the local economy and the heart of their communities and need to be supported and enhanced (paragraphs 23 to 27 of the NPPF advise on "Ensuring the vitality of town centres"). Paragraph 28 on "Supporting a prosperous rural economy" sets out what policies in local and neighbourhood plans should do to support 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.

## **The Local Context**

The local economy spreads beyond the administrative boundaries of the district, and Babergh has worked with neighbouring authorities in the Ipswich Policy Area and, more recently within the Haven Gateway Partnership. The Haven Gateway sub-region (recognised by the government as a growth point) has been further divided into Suffolk and Essex Haven Gateway. Suffolk Haven Gateway (SHG) comprises Ipswich Borough, Babergh, Mid Suffolk and Suffolk Coastal Districts and is based on Ipswich and the Port of Felixstowe. Both of these are important economic drivers of economic development and employment in Babergh.

Working jointly with partners has enabled Babergh to collect and update information and share evidence to track and plan for the needs of businesses and the local economy. The Suffolk Haven Gateway Employment Land Review (SHG ELR) (2009) provided the opportunity to review the quantity, quality and distribution of employment land and premises in the district, and helped inform the strategy for meeting the long term needs of business and enterprise in the district.

Babergh encourages the re-use of vacant business premises and sites, and the redevelopment of derelict and vacant sites and premises that are of poor quality and not fit for purpose in the 21st century to create opportunities for new businesses, either coming to Babergh or starting-up, or local firms that want to expand. Being a rural area the amount of brownfield land is in short supply. Often vacant employment premises and sites are well located in terms of accessibility for the local labour force, supplies and services, and play a potentially important role in achieving a balance in providing jobs and homes.

Historically the supply of employment land has been low, and take-up of new sites has been fast (e.g. Crockett Road in Hadleigh, as an extension to the Lady Lane employment area, and Churchfield Road on the Chilton Industrial Estate in Sudbury). Business sites and premises change hands frequently, and firms move to larger premises within the local area to facilitate expansion. The retention of a range of sites and premises across the district for employment use is essential to Babergh's strategy of supporting the local economy and encouraging growth and innovation, and is therefore included in Policy CS2 as a key component of an integrated growth strategy. The SHG ELR provides a local and sub regional context for this approach, and sites will be monitored and reviewed in subsequent DPDs.

### **3.4.4 Strategy for the Future**

In planning for a growth in jobs in our area we need to consider how we might deliver new jobs through the plan period. Whilst planning cannot create (or deliver) jobs, planning policies appropriate to the area can help to encourage, support and enable enterprise and the delivery of new and expanded businesses.

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, monitoring, reviewing and where appropriate 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.

In terms of our strengths, we have identified the following sectors that should be promoted and encouraged in the district:

- Port and logistics
- Information and Communications Technology;
- Manufacturing – reflecting the historical advantage/local tradition
- Tourism and related leisure / hospitality service sector

- Non-B Use Class employment – including public sector jobs such as teaching, health and welfare;
- Rural / Agricultural diversification – including farm shops and farmers markets.

Our approach will be to create opportunities for jobs in these sectors:

- by supporting and encouraging SMEs;
- by regularly reviewing and protecting existing land and premises, 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 encourage new ways of working, particularly home working.

The evidence shows two main economic growth poles, or zones of influence, for Babergh, Ipswich/the Ipswich Fringe / Port of Felixstowe / east Babergh area including Brantham, and the western growth pole of Sudbury/ Great Cornard and outlying satellites of Glemsford, Acton, Long Melford, and Great Waldingfield. Between these two areas lies Hadleigh, which is part of the Ipswich ‘travel to work area’ but is also significant in its own right as an employment base for the town, and as an important local town centre. New Directions of Growth are identified in these three areas to provide for sustainable development through the plan period, including allocating land for new and growing businesses.

Planning for new jobs cannot take place in isolation, and we recognise that business activity doesn’t follow local authority boundaries, and that some of the employment areas in Babergh are important outside the district because of their location. In addition, Ipswich borough area is geographically constrained, and within Suffolk and the Haven Gateway area local authorities have traditionally considered the wider Ipswich Policy Area in planning for jobs and homes. The Council will continue to work with our neighbouring authorities and sub-regional economic groups to consider the most appropriate distribution for new employment development taking into account the needs of businesses, land availability, environmental constraints, and a sustainable relationship with the parts of the Ipswich Fringe proposed for housing growth.

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 monitored and reviewed and where appropriate protected for employment development and allocated in the Site Allocations DPD. 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.

Our approach aims to reflect the economic geography of the district so that the strengths of each area are recognised and encouraged, suitable existing sites protected and new sites allocated. The potential capacity of existing sites, sites within new mixed and balanced communities, and the potential for economic development in Core Villages, have given us a “bottom-up” target of new jobs for the twenty year plan period.

#### Local Economic Strategy: Spatial Implications

The Core Strategy and Policies document identifies and allocates those locations and sites that are of strategic importance to delivery of the economic strategy. These are set out in Policy CS2 and in their own subsequent policies, although the IP8 site (Ipswich) will be considered further and dealt with in a subsequent document. A number of other smaller employment locations / sites remain allocated across the district (covered at present by

Local Plan saved policies) and the available evidence (ELR late 2009) indicates that these should be retained. This evidence and the sites concerned will be kept under review and considered for potential renewal by site allocations in later document(s) of the new Local Plan, where appropriate. In line with the ELR findings and recommendations and subsequent evidence, it may also be necessary to make new allocations at that time, particularly for the Ipswich Policy Area / A14 corridor. The detailed basis for these will be determined by further evidence preparation and review and allocations to be made in the latest Local Plan documents when they are produced.

Further employment land / jobs delivery evidence is being prepared, along with more specific, joint, cross-boundary research on A14 corridor employment sites. This will facilitate the preparation and maintenance of an employment land / jobs trajectory for the Plan period. It will be supported by detailed information on each site (including deliverability) and the whole exercise supported by ongoing monitoring in line with the Plan, monitor, manage approach.

The Council's strategy is to encourage and promote proposals that strengthen the local economy and provide a diversity of employment opportunities. The following existing business sectors are identified as major employers in the district:

- Manufacturing
- port related logistics/warehousing and distribution
- ICT
- Non-B Use Class businesses including tourism, leisure and hospitality, education, health and welfare

Development for these sectors will be encouraged, and where appropriate, clusters and / or networks will be identified through allocations and policies in subsequent Local Plan documents. All proposals for development should comply with other policies in the Core Strategy and Policies document, particularly Policy CS10, and other subsequent documents as appropriate.

### **3.4.5 Rural Economy**

A key objective of the strategy, in line with those of the Government is to promote opportunities for sustainable economic growth. In a rural district this must include appropriate growth of the rural economy. This needs to be balanced with protecting the countryside for the sake of its intrinsic character and beauty and the diversity of its landscapes, heritage and wildlife and the wealth of natural resources. Most development should be located in the towns and urban areas where more people have access to opportunities. Local centres in rural areas also form accessible hubs and provide opportunities for some employment in these areas serving these communities and the rural hinterland. This is intrinsically linked to the "functional cluster" approach described above. Core Villages and some Hinterland Villages may already provide a focus for many communities for a number of needs.

Redundant buildings in or close to rural settlements also provide opportunities for new and expanding local businesses, enterprise and innovation. Farm diversification and the re-use of suitable buildings will continue to be encouraged where development is sustainable and meets national planning policies and Policy CS10 in this Core Strategy and Policies document.

Sustainable new development supports economic growth in rural areas, and appropriate employment opportunities in these locations provide local employment, and offer opportunities closer to home, rather than relying only on the larger urban centres, although it is recognised this is where most employment should be located.

The Climate Change Strategy set out above includes a commitment that the Council will encourage existing and new businesses to locate and grow to meet the demand for products throughout the supply chain to serve the renewable / low carbon energy industry in Suffolk and north Essex. Such businesses are often small scale and in many cases could be appropriate occupants for a converted redundant building or rural location. Such businesses would add to the diversity of employment opportunities that Babergh seeks to nurture in the rural area.

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 NPPF requires support for sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors and which respect the character of the countryside,. It remains necessary however, to ensure environmentally sensitive sites and landscapes are protected.

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. The Council will support sustainable rural tourism and leisure development where identified needs are not met by existing facilities in Core and Hinterland Villages.

### **Policy CS13: The Rural Economy**

**Historic villages, such as Lavenham and Long Melford and coastal villages such as Chelmondiston and Shotley play an important role in tourism and leisure within the district, and appropriate new development that supports this role will be encouraged.**

**The economy in the rural area will be supported through a number of measures including:**

**a) through the encouragement of :**

- **proposals for farm diversification,**
- **the re-use of redundant rural buildings,**
- **sustainable tourism and leisure based businesses (including those offering a diverse range of visitor accommodation, activities or experiences),**
- **businesses involved in the renewable energy / low carbon industry at an appropriate scale for the location,**
- **rural 'business parks', and workshops, rural and community business 'hubs' that share facilities and other innovative rural enterprises, and innovative business practices such as co-operatives or micro-businesses based on shared facilities / services,**
- **and where appropriate, farm shops and farmers markets, and**

**b) support for / promotion of rural businesses.**

**All proposals for development should comply with other policies in the Core Strategies and Policies document, particularly Policy CS10, and other subsequent documents as appropriate.**

### **3.5 Homes for All**

#### **3.5.1 Background**

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.

#### **The Evidence**

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.

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.

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%.

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.

#### **Local Context**

Babergh is a rural district with few sites coming forward for larger developments, particularly in rural areas. All but very small developments have the potential to deliver a wide choice of homes and contribute towards sustaining mixed communities. 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, including opportunities for people wishing to build their own homes. Larger strategic developments will have an important role to play in creating inclusive and mixed communities through addressing the particular needs of disadvantaged groups within the community, including the elderly population and vulnerable groups in the district. 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.

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 Site Allocations DPD will include a range of criteria appropriate to the size, location and constraints (including viability issues) of each site and policies will be developed that address particular needs as appropriate.

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.

### 3.5.2 Gypsies and Travellers

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. **Some of the aims of the National Policy for Traveller Sites are to reduce unauthorised developments and encampments, reduce under-provision in Gypsy and Traveller accommodation and, importantly, to increase the number of traveller sites in appropriate locations with planning permission. The application of Policy CS14, plus Policies CS1 and CS10, needs to be considered within this national planning context.**

Gypsies, Travellers and Travelling Showpeople have their own specific accommodation needs, which the Council is required to assess and address. A cross-boundary Gypsy and Traveller Accommodation Assessment for Suffolk was completed in 2007. A review is being undertaken in 2012, the results of which will inform future policy and decisions.

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.. 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. 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.

#### **Policy CS14: Mix and Types of Dwellings**

**Residential development that provides for the needs of the District's population, particularly the needs of older people will be supported where such local needs exist, and at a scale appropriate to the size of the development.**

**The mix, type and size of the housing development will be expected to reflect**

**established needs in the Babergh district (see also Policy CS10).**

Development on strategic housing sites or mixed use developments with a substantial residential element will be required to make provision for the accommodation needs of vulnerable or identified groups of people, as reflected in established local needs assessments.

New pitches / plots will be provided at an appropriate level and in suitable locations to meet the identified needs of Gypsies and Travellers / **Travelling Showpeople** in the district if these arise. The preferred approach to meeting identified needs is to be through strategic housing sites or mixed use developments, or through small sites according to the settlement pattern and depending upon the nature of identified need. **The Council will continue to work on cross-boundary matters with neighbouring authorities to meet identified needs for transit site pitches.** Proposals for new pitches / plots will be assessed against the policies of this Local Plan (particularly Policies CS1 and CS10) and relevant policies of subsequent DPD(s).

**Note:** 'strategic housing sites' are those identified in this Local Plan. This will include site allocation policies that will set out the requirements for the development, including any specific accommodation needs that have been identified through evidence based studies (such as the Housing Needs Survey /Strategic Housing Market Assessment or Local (Parish) needs surveys). 'Accommodation needs' include the need for appropriately designed market housing, as well as a mix of social housing sizes and types designed to meet the affordable housing policy targets.

### **3.5.3 Affordable Homes**

Affordable housing is a key priority in Babergh and delivering affordable housing will help to create mixed and balanced communities. It will also 'widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need'.

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, housing in Babergh continues to 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.

There is a substantial need for affordable housing in the district and it is expected to remain as such for the Plan period. It is suggested that this need would not be addressed by predicted supply. Whilst it is necessary to deliver as much affordable housing as possible, a realistic and achievable target has to be set. Local evidence suggests that, based on viability and housing needs across the district, there is scope to remove site size thresholds (that is the size of open market residential sites at which affordable housing requirements will apply) to increase affordable housing delivery. The evidence also suggests that the current affordable housing requirements of 35% would still be an appropriate target for the plan period.

The policy sets out a target of 35% affordable housing for all residential development. This is appropriate to all locations, whether it is a small group of dwellings in a village, an infill development in a town, or a conversion or change of use, and is an equitable application of policy that will contribute to the provision of affordable housing in the district over time. The policy will apply where the proposed development results in a net gain, i.e. if the proposal is for the demolition of one dwelling and erection of four dwellings the 35% affordable housing target will apply to three dwellings.

The evidence shows us that at present there is mainly a need for social rented accommodation in the district, with a tenure split of 75% social rented (see glossary for definition) and 25% intermediate affordable housing. This tenure split was established by the Housing Needs Survey of 2008 and tested as part of the viability assessment. A new type of rented product, known as Affordable Rent was introduced by the Government in 2011 (see glossary). The impact of this has yet to be assessed, but in any event the evidence will be updated on a regular basis to reflect changing needs and circumstances within our communities ensuring that tenure requirements are based upon the most up to date established needs in our communities.

Responses at the Issues and Options stage indicated support for affordable housing requirements to remain at 35%, although in terms of thresholds, responses favoured lower affordable housing requirements for lower thresholds. The need for affordable housing was further reinforced in feedback to the Growth Issues consultation and engagement with town and parish councils in the autumn of 2010.

The type of homes proposed should meet the identified need in the most appropriate way for that location, including size, scale and design (e.g. the development may need to consider single-storey buildings either as individual dwellings or in groups, and a 'lifetime homes' approach to suit local circumstances).

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 or two dwellings only, and in other exceptional circumstances where affordable housing cannot be provided on site, a commuted sum will be required instead, to add to the existing housing stock in the locality. 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.

### **3.5.5 Rural Affordable Homes**

Traditionally, rural affordable housing has largely been brought forward through the use of a rural exceptions affordable housing policy, and there is evidence that there will continue to be a need for the provision of affordable housing in perpetuity that meets local need in Babergh's rural settlements.

There is often considerable difficulty in finding and securing sites for rural exception sites, particularly in terms of availability, due to a 'hope value' (for open market housing) among landowners holding land adjoining village boundaries. In some cases a site that is separated from the settlement development boundary by a small area of intervening land or complex of buildings may be as well related as (or better related than) a site that abuts a settlement development boundary. The geography of each village is different and maintaining a rigid requirement for a rural exceptions site to "abut" the settlement development boundary ignores the reality of this situation.

In any event, development for rural affordable housing needs to be "local", that is it should relate well to the population from which the need arises. Because the functional cluster approach that has informed our settlement pattern and growth and distribution policies is based on the day-to-day connections – the practical real-life experience of Babergh village residents, it should have an important role to play in focussing site selection for rural affordable homes. By identifying Core Villages and their clusters it widens the opportunity for local needs to be met on land or within schemes being developed at other, more sustainable locations within a cluster. Some rural settlements may be very small and/or scattered, and where it is not possible to identify a rural exception site within that settlement the need could be met in a nearby Hinterland or Core Village within that cluster or clusters

(in the case of settlements where the 'boundaries' of the clusters overlap). 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, and is in line with paragraphs 54 and 55 of the NPPF.

Rural exceptions sites are usually, by definition in the countryside, and will therefore need to be controlled. The criteria-based policy for affordable homes on rural exception sites set out below requires rural affordable homes to be developed adjacent, or well related to the settlement development boundaries of Core and Hinterland Villages, and for sites to be well related to existing villages, and acceptable in relation to site location, design, layout, landscaping, etc.

#### **Policy CS15: Affordable Homes**

In order to promote inclusive and mixed communities all residential development\* will be required to provide 35% affordable housing. Individual targets may be set for New Directions of [the Strategic Broad Location for Growth](#) and in Core / [Hinterland](#) Villages ([Note 4](#)) in Area Action Plan and Site Allocation DPDs.

Where the proposed development is for only one or two dwellings<sup>1</sup>, and where affordable homes cannot be provided on site, a commuted sum will be required<sup>2</sup>. The tenure types, mixes and sizes of affordable homes will reflect established needs in the District\*. The onus is on developers to provide documentary evidence to support cases where development viability is a proven issue, and where such cases are accepted the local planning authority will determine an appropriate proportion of affordable homes, tenure mix and/or appropriate levels of commuted sums on a site-by-site basis..

\*Note 1: Only where a net gain of dwelling(s) is involved

Note 2: Supplementary guidance will be produced for the time of the policy's introduction to make clear the contributions to be required and will be regularly updated

Note 3: As reflected in the most up to date Strategic Housing Market Assessment and Tenancy Strategy or other relevant evidence

[Note 4: Where this is justifiable and supported by up-to-date viability evidence.](#)

#### **Policy CS16: Rural Exception Sites**

The Council will take a flexible approach to the location of rural exception sites in the district, and will allow proposals adjacent, or well related, to the settlement development boundaries of Core and Hinterland Villages where:

- the development complies with other relevant policies in the Core Strategy and Policies document, particularly Policy CS10;
- the proposed development by virtue of its size, scale and type will not exceed the identified local need (including need identified in other settlements within the same or adjacent / adjoining functional cluster(s));
- the type of dwellings to be provided are consistent with the needs identified by the housing needs survey and agreed in advance by the District Council; and where
- the proposed development is appropriate to the size / scale and character of the village, and is acceptable in terms of other detailed considerations such as site location and circumstances, design, layout, materials, landscaping, biodiversity, impacts on the countryside, amenity, and

### **access, etc.**

**Note:** The following criteria will be used to assess whether a proposal is well related to the host village:

- physical distance / degree of separation - a sequential approach to site selection will be used (that is, sites adjacent to the boundary need to be explored first, with sites at increasing distance being sequentially less preferable in principle);
- the location of the site in relation to the facilities, services and other such sustainability assets (such as recreation provision, employment opportunities, etc.) of that village;
- accessibility to the village (primarily by non car transport modes) and ability to improve it; and
- visual impacts and ability to integrate the development into the landscape

## **3.6 Implementation and Monitoring**

### **3.6.1 Key Principle: The Role of Evidence**

This Core Strategy and Policies document has been prepared through the gathering, interpretation and application of a comprehensive supporting evidence base. The importance and use of evidence in planning is supported strongly in the interests of making fair, reasonable, rational and defensible planning choices and decisions. Equally, therefore, without creating onerous requirements upon applicants and developers, it will be a requirement in principle that development (generally beyond straightforward domestic alterations) needs to be supported by appropriate evidence, where the determination of applications or other proposals requires it. The term 'appropriate evidence' will mean in practice a level and complexity of evidence that is proportionate to the particular proposal (and its complexity) and relevant to its site-specific circumstances.

#### ***Key Principle for Planning and Development: The Need for and Use of Proportionate Evidence***

*The Council supports and will require the demonstration of evidence in planning and development matters that is proportionate and therefore appropriate to the particular proposal or matter under consideration and its site-specific circumstances.*

The Council recognises that financial viability is a very important factor and may be a material consideration in planning and development terms. This includes the fact that ensuring development viability will be essential in achieving delivery and implementing the strategies and policies in this document and subsequent Local Plan documents. Accordingly, the demonstration and interpretation of sound and conclusive evidence on financial viability considerations will often be required, where this has an important bearing in planning matters.

### **3.6.2 Infrastructure Delivery Strategy**

The term "infrastructure" is used to refer to all of the facilities that are provided on a communal basis within a settlement, to enable it to function properly in the current day. Thus it will include:

- utilities, including waste and telecommunications
- transport - roads, rail, footpaths, cycleways
- social
- cultural
- educational – schools, nurseries
- recreational – play areas

- community, including health and security
- green areas

A number of different agencies apart from the Council are involved with infrastructure provision, invariably having their own investment programmes, which are governed by many factors apart from planning policy. There is for example Suffolk County Council which has just approved its third Local Transport Plan. It also has a Schools Investment Programme. The NHS has a continuous programme of investment in health infrastructure. The Environment Agency and Anglian Water are other key investors. Thus the provision of satisfactory infrastructure involves many other parties apart from the Council.

However, the general public is making it increasingly clear that where new development takes place, it expects that associated infrastructure will be provided contemporaneously. By this is meant not just vehicular access and drainage, but all of the amenities that the occupiers of the particular land use have a right to expect. If it is a residential use, then green infrastructure in the form of landscape corridors and play areas is expected, and social infrastructure in the form of education, healthcare, policing and so on is provided. On larger developments, retail facilities, sports provision and access to public transport provision may be important. All of these elements contribute towards the objective of sustainable communities and affect quality of life.

This is a challenge to the Council, to local providers and to developers, involving as it does many different agencies. In the past many of the agencies have been reactive to development and reliant upon centrally funded initiatives. Increasingly though, service providers are looking for contributions from developers, and whilst this is often legitimate, it brings with it a duty to spend the received monies on the promised infrastructure to an agreed timetable, and this invariably involves finding some matching funding and taking on board the revenue implications of continued provision.

This Core Strategy and Policies document can play a vital part in achieving the goal of coordinated infrastructure provision by setting out clearly the expectations of all parties. This, combined with the “duty to co-operate” set out in the Localism Act 2011 should improve performance. Progress on this Infrastructure Delivery Strategy will be monitored by the Council, and it is expected that all agencies will see the important part their investment plays in the overall programme, and will tailor their investment strategies accordingly.

The strategy has to be backed up with legal powers to ensure that obligations are met. These are principally found within Section 106 of the Town and Country Planning Act, which facilitates a binding legal agreement on such matters between the Council as local planning authority and the land owner/ developer and successors in title.

A new tool available for use in infrastructure provision is the Community Infrastructure Levy (a “CIL”). This enables a local planning authority to make a levy on new buildings according to their size, location and end use, which can then be put towards infrastructure projects. It is expected that a CIL will be introduced in Babergh, which will be of significant benefit to the District, and the relevant procedures will be the subject of a Supplementary planning document. Therefore, the coming years will see the gradual shift of much infrastructure provision from the section 106 route to the CIL approach, which should be simpler, fairer and deliver a more comprehensive package of facilities.

Commercial development must also be supported by adequate infrastructure. Structural landscaping provision and good public transport connections can be critical to ensuring the success of such developments.

The Council will work with other infrastructure providers to ensure that delivery programmes are finessed and coordinated with development timetables. Policy CS17 makes clear what the Council expects to achieve in its approach to Infrastructure provision.

### 3.6.3 Delivery and Monitoring Framework

The Local Plan provides a clear framework for future development in the District. It aims to enable the co-ordination of other partners and stakeholders strategies and investment plans to contribute to efficient and effective delivery.

The Local Plan policies will be delivered through a range of mechanisms, including the Development Management process, as well as supporting initiatives for which other partners are the main drivers.

Most policies will require collaborative working between a wide range of bodies, including: infrastructure providers, developers, service providers, government agencies, parish and town councils. The Delivery and Monitoring Framework is attached as Appendix 3. It sets out a summary of what the intended outcomes are for each policy, how they may be delivered, by whom and when. In addition it broadly indicates the indicators for success, the risks, flexibilities and contingencies, in the event that monitoring of these point to a failure to deliver.

The table in Appendix 3 provides a summary and, as such, cannot be regarded as fully inclusive, but is intended to provide a broad guide to delivery. We have not therefore listed every outcome or agency involved, but have identified the main ones. The Core Strategy and Policies document does not deal with details - subsequent documents will address more detailed issues and outcomes.

The Delivery and Monitoring Framework, set out in full in Appendix 3, covers a summary of the following elements for each policy in the Core Strategy and Policies document:

- **What** - Indicates the outcomes that are required to achieve successful delivery of the Local Plan Policy, including the infrastructure needed to support development.
- **How** - Illustrates the mechanisms or measures which are relevant to guide or ensure delivery of the desired outcomes for the policy.
- **Who** - Identifies the main partners or agencies responsible for delivering the outcomes. By implication, this will often include the responsibility for funding, which may be through partnerships and contributions.
- **Who / What else** - Identifies any key dependencies of agencies or actions which may be necessary to enable successful delivery of the outcomes of the policy.
- **What may happen** - Highlights potential risks or unplanned events which may impact on the ability to successfully deliver the outcomes of the policy. This will include factors such as viability issues or other unforeseen obstacles which influence the ability to deliver all or part of the Local Plan policy.
- **What if** - suggests appropriate flexibilities and contingencies which could be applied in the event that any risks are realised. It is implicit that continued and robust monitoring will inform the need to introduce flexibilities or apply the contingencies in order to successfully deliver the outcomes of the policy.
- **When** - Indicates the anticipated timescale for the delivery of the outcomes of the policy. In most cases this is ongoing throughout the plan period, due to the strategic overarching context of the policies. However, particular policies are linked to a phased approach, where key timescales are applicable.
- **Status** - illustrates the extent to which the outcomes of the policy are essential to the delivery of the objectives of this and wider aspects of the Local Plan. In terms of the Strategic Sites / New Directions of Growth, this is indicated in respect of the infrastructure requirements based on the following:

- o **Critical (C)** Infrastructure which is fundamental for the development to be built, without which the site would be undevelopable.
  - o **Required (R)** Infrastructure that has been identified as being required by stakeholders to provide the expected level of service to the occupiers of the new development.
  - o **Desirable (D)** Infrastructure provision which will make the development more attractive and without which, may not achieve the comprehensive sustainable development intended.
- **Indicators of Success** - This identifies the key factors / indicators which will demonstrate whether the Local Plan Policy is operating successfully. The main process for this will be through the Annual Monitoring Report, which the Council will continue to prepare and publish each year. The table in Appendix 3 does not repeat the indicators within this, but highlights the key factors which may suggest success or failure in delivering the policy outcomes.

#### 3.6.4 Monitoring

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.

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:

- the Plan's objectives;
- Government's priorities;
- requirements arising from the Sustainability Appraisal and HRA, and
- other plans and strategies such as Tenancy Strategies

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.

The Habitats Regulations also require the Council to monitor the impacts of development on European sites, particularly the Stour and Orwell Estuaries Special Protection Area and Ramsar Site. The HRA screening suggests that Babergh will primarily need to ensure the impacts on the Stour and Orwell estuaries are monitored, as other European sites which could potentially be affected, will be monitored by other councils. As part of this requirement monitoring reports will include:

- Progress by Babergh and neighbouring councils on the proposals within the Haven Gateway Green Infrastructure Strategy, and Babergh's wider Green Infrastructure Framework, and;
- reviewing information from Natural England, the Wetlands Birds Survey and organisations monitoring visitor pressure and when appropriate, supplementing this with additional monitoring requirements in the Stour and Orwell estuaries

Policy CS18 provides the context / commitment to this "monitor and manage" approach.

**Ensuring that delivery of new homes and jobs is supported by evidence based need for physical and social infrastructure required is critical to the delivery of growth and particularly the implementation of policies CS3, 3a, 4, 5, 5a, 5b, 6 and 6a.**

**Policy CS17: Infrastructure Provision**

The District Council will work with service providers, developers and other partners to develop sustainable places in the Babergh District with safe and healthy communities and secure the appropriate social, physical and green infrastructure needed to support these places and safeguard the environment.

The Council will protect, safeguard and enhance existing services, facilities and amenities that are important to the sustainability of local communities.

All proposals for new housing and commercial development will be required to be supported by, and make adequate provision for, appropriate infrastructure, services and facilities to ensure that the development is sustainable and of a high quality.

Strategic as well as local infrastructure requirements will be planned for. Those infrastructure items currently foreseen are identified in policies, CS3, CS4 CS5, and CS6a, in the table in Appendix 3. Other items will come forward as the detailed planning of development progresses and must be provided for.

New development may need to be phased appropriately to ensure the proper provision of all infrastructure needed to support the development.

Where appropriate the Council will seek on-site provision of infrastructure by the developer. Alternatively, financial contributions may be required to ensure timely off-site or on-site delivery of all types of infrastructure, according to agreed timetables, which will be co-ordinated to relate to the advancement of the development. Arrangements for the ongoing maintenance of facilities will be required.

The Council will secure the co-ordinated provision of Infrastructure elements with development timetables through planning conditions, and Section 106 Agreements attached to the planning permissions for developments, and/or through a Community Infrastructure Levy programme.

A Supplementary Planning Document will be prepared setting out the mechanisms that will be used for taking development contributions, including the scope for pooling of contributions secured within the functional clusters, together with further details of the types and priorities of infrastructure provision.

Planning applications which do not make proper provision to secure and maintain the necessary infrastructure will be refused.

**Policy CS18: Monitoring**

Annual monitoring will track the delivery of development of new jobs and homes. It will assess the effectiveness of the Core Strategy and Policies document and identify any unintended impacts.

**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.**

**Phasing of development will be closely monitored in Sudbury where Policy CS3 provides a trigger for the broad direction of growth to advance sooner if the Chilton Woods proposal CS3a has not progressed sufficiently.**

**The impacts of the Babergh Core Strategies and Policies document on adjoining districts will also be monitored, as will any impacts of Strategies of adjoining authorities on Babergh.**

**The results of this monitoring will be taken into account in the implementation of the Core Strategy and Policies document, 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 Local Plan document.**

WORKING DRAFT

**Key Diagram**

WORKING DRAFT

**Note: Terminology and explanations in the Glossary will be updated following publication of the NPPF prior to further consultation.**

## Glossary

**Affordable Housing** - Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market (PPS3 definition).

**Affordable Rent Tenancy (ART)** – ART is a new type of affordable housing intended to provide an alternative to, but not replace, social rent.

**Air Quality Management Area (AQMA)** - An area identified by a Local Authority within its boundaries where the Air Quality Objectives are not likely to be achieved. The area may encompass just one or two streets, or it could be much bigger. The Local Authority is subsequently required to put together a plan to improve air quality in that area - a Local Air Quality Action Plan.

**Annual Monitoring Report (AMR)** - A report that is published annually and which assesses the district's performance against national monitoring indicators and local planning policies. The AMR also reports on progress made against the LDF timetable set out by the local authority. The content and frequency of publication of AMRs may be subject to change following enactment of the Localism Bill (2010 – 11).

**Area Action Plans (AAPs)** - A type of development plan document relating to specific areas of major opportunity and change or conservation.

**Area of Outstanding Natural Beauty (AONB)** - A landscape designation showing that the area is of national landscape importance, specifically designated by the former Countryside Agency (now Natural England). There are two such designated areas in Babergh - The Suffolk Coasts & Heaths AONB and the Dedham Vale AONB.

### **Biodiversity Action Plan (BAP)**

A Biodiversity Action Plan is a program for addressing threatened species and habitats and is designed to protect and restore biological systems. The plan identifies targets for improving and protecting biodiversity in an area. There are regional, county and local BAPs.

**Babergh Development Framework (BDF)** - Simply, the shortened and adopted name for Babergh's own Local Development Framework

**BREEAM (Building Research Establishment Environmental Assessment Method)** - A tool that allows the owners, users and designers of buildings to review and improve environmental performance throughout the life of a building.

**Brownfield** - Brownfield land is land that has been previously developed (but excluding agricultural buildings and, since 2010, private garden land). Also referred to as Previously Developed Land (PDL).

**Building for Life (BfL)** - Building for Life is the national standard for well-designed homes and neighbourhoods. It is a tool managed by a partnership of Design Council CABE, Home Builders Federation and Design for Homes. CABE has been absorbed into the Design Council, and information on Building for Life can be found through archived pages of the Building for Life website [www.buildingforlife.org](http://www.buildingforlife.org) and on the CABE part of the Design Council's website [www.designcouncil.org.uk](http://www.designcouncil.org.uk)

**Code for Sustainable Homes (CfSH)** - An environmental impact rating system for housing in England. The CfSH sets out standards for energy efficiency and sustainability. More information can be found on the Department for Communities & Local Government website [www.communities.gov.uk](http://www.communities.gov.uk).

**Communities & Local Government (CLG)** - The central Government Department with overall responsibilities for planning and many associated functions, and for local government [www.communities.gov.uk](http://www.communities.gov.uk)

**Community Infrastructure Levy (CIL)** - The Community Infrastructure Levy is a new planning charge that was introduced by the Planning Act 2008. It came into force on 6 April 2010. The Act empowers Local Authorities to set a charge for most developments, through a simple formula related to the scale and type of scheme. The proceeds of the levy must be spent on local and sub-regional infrastructure to support the development of the area

**Conservation Area** - An area of "special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance" designated by local authorities under the Planning (Listed Buildings and Conservation Areas) Act 1990 and identified in Development Plans.

**Core Strategy (CS)** - The Core Strategy forms the key part of the Babergh Development Framework. It is a strategic document that sets out the long term spatial vision and strategy for the district, including working with other organisations to achieve this.

**County Wildlife Site (CWS)** - A designation for sites in the County which do not benefit from statutory protection but are of high value to wildlife and are very important in a local context, and often of regional or national, importance. These sites are identified by the Suffolk Wildlife Trust, Natural England, Suffolk Biological Records Centre and Suffolk County Council.

**Development Brief** - A document produced as supplementary planning material that usually deals with specific ideas / requirements for the development (or redevelopment) of a particular site. 'Concept Statements' have the same purpose and may be similar in nature.

**Development Management DPD** - Part of the Babergh Development Framework containing criteria based policies which will be applied to ensure that all development meets the overall vision and strategic policies set out in the Core Strategy. To greater or lesser extent these policies will need to be taken into account in the determination of the majority of planning applications.

**Development Plan** - Under current legislation and regulations, the statutory planning framework for a particular locality (or even group of them) is made up of a Local Plan and other Development Plan Documents (which may comprise one or more documents) an LDF and currently the regional plan. The Localism Act Bill (2010 – 2011), when enacted, will abolish Regional Strategies in January 2013. (National planning policy / guidance does not form part of the statutory development plan).

**Development Plan Document (DPD)** - Statutory planning documents that are part of the Babergh Development Framework (BDF) and are subject to community consultation and independent testing by a Government appointed inspector. The Core Strategy is a DPD, which will be followed by other DPDs, particularly a Site Allocation DPD and Development Management DPD.

**East of England Regional Assembly (EERA)** - The former regional planning body for the 'East of England' region. EERA oversaw the preparation of Regional Spatial Strategy in this region. (EERA was dissolved in March 2010).

**East of England Plan** - See Regional Spatial Strategy (RSS)

**Employment Land Review (ELR) and Strategic Sites Study for SHG** - A study carried out in 2009 for the Suffolk Haven Gateway authorities, Ipswich, Suffolk Coastal and Babergh, that provided a comprehensive picture of the local economy.

**Examination in Public (EiP)** - The process by which an independent Planning Inspector publicly examines the soundness of a DPD and any representations made against it before issuing a binding report.

**Flood Zone** - Areas that are at risk of flooding, and which are identified by the Environment Agency – High Risk (Zone 3), Low to Medium Risk (Zone 2), Low Risk (Zone 1).  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

**Green Infrastructure** - A network comprising multi-functional elements that may include protected sites, nature reserves, green spaces and greenway linkages, river corridors and flood plains, migration routes and features of the landscape which are important as wildlife corridors. A useful definition can be found in a report by Forestry Research (2010) “Benefits of Green Infrastructure”: “Green Infrastructure refers to the combined structure, position, connectivity and types of green spaces which together enable delivery of multiple benefits as goods and services. It is important to consider green infrastructure holistically and at landscape as well as individual site scale.”  
[www.forestry.gov.uk](http://www.forestry.gov.uk)

**Greenfield** - Land which has not been previously developed, or land that has no recent history of development (e.g. farmland). (See also Brownfield)

**Habitats Regulations Assessment (HRA)** - An assessment of whether a plan or project under consideration is likely to have a significant effect upon an internationally important site such as a Special Area of Conservation (SAC) or Special Protection Area (SPA), or a Ramsar site.

**Haven Gateway (inc. Haven Gateway Partnership - HGP)** - The Haven Gateway is a sub-region that had formerly been recognised as a growth point. It has been further divided into Suffolk and Essex Haven Gateway. Suffolk Haven Gateway (**SHG**) comprises Ipswich Borough plus Babergh, Suffolk Coastal and Mid Suffolk Districts and is based on Ipswich and the Port of Felixstowe. The Haven Gateway Partnership is a sub-regional Partnership to provide a framework through which its partners - from both the public and private sectors - could work together to promote economic opportunities and secure the future prosperity of this international gateway to the UK.

**Health Checks (Town Centre Health Checks - TCHCs)** - TCHC are checks carried out usually on an annual basis to provide valuable up-to-date information about towns in the district - principally Sudbury and Hadleigh. They included a range of information on the general health of each town.

**Housing Stock** - The total number of houses in an area (completed).

**Housing Needs Survey / Study** - A study which assesses the future housing needs of the District in terms of the size, type, and affordability of dwellings. The Babergh Housing Needs Survey was published in 2008.

**Ipswich Policy Area (IPA)** - An area including but stretching well beyond the boundaries of Ipswich Borough (into Babergh, Mid Suffolk and Suffolk Coastal districts) covering a number of parishes in each district and used for joint planning and co-ordination purposes by the constituent local authorities including Suffolk County Council

**Key Diagram** - The key diagram illustrates the spatial strategy set out in the Core Strategy.

**Key Service Centre (KSC)** - The term often used to describe and designate larger, service centre villages typically characteristic of more rural districts like Babergh – these are usually one tier of a district’s settlement hierarchy for planning and service provision purposes.

**Listed Building** - A building or structure designated for its historic, architectural or artistic interest. Local Authorities have a statutory duty to safeguard listed buildings in their area of jurisdiction.

**Localism Bill** - The Bill currently (September 2011) proceeding through Parliament that seeks to bring about the current Government's Localism (community empowerment) agenda, introduces changes to the planning system and, when enacted, will abolish Regional Strategies (including the East of England Plan)

**Local Development Document (LDD)** - A collective term applied to all documents in Local Development Frameworks. LDDs include the Core Strategy and other Development Plan Documents (DPDs), the Statement of Community Involvement (SCI) and Supplementary Planning Documents (SPDs).

**Local Development Framework (LDF)** - A portfolio of documents, developed by a local planning authority, and which collectively deliver the spatial planning strategy specific to a given area. (See also BDF).

**Local Development Scheme (LDS)** - A programming document that local planning authorities must produce to set out which documents it will produce to make up its LDF and the timetable for doing so

**Local Nature Reserve (LNR)** - A non-statutory designation of a site of local nature conservation significance, declared by local planning authorities.

**Local Strategic Partnership (LSP)** - LSPs are non-statutory bodies intended to bring together the public, private, voluntary and community sectors at a local level. Their purpose is to improve the delivery of services and quality of life locally.

**Local Transport Plan** - The transport strategy prepared by the local transport authority i.e. Suffolk County Council. The Suffolk Local Transport Plan 2011 – 2031 Part 1: Transport Strategy, Part 2: Implementation Plan was published in 2011.

**Mixed Use Development** - A term used to refer to a variety of types of development on a particular site i.e. housing and employment.

**National Planning Policy Framework (NPPF)** - A consultation draft of the Government's National Planning Policy Framework (NPPF) was published on 25<sup>th</sup> July 2011. The NPPF is described as a key part of the Government's reforms "to make the planning system less complex and more accessible, and to promote sustainable growth". The NPPF will replace Planning Policy Statements and Planning Policy Guidance Notes.

**Neighbourhood Plans** - An important element of the above-mentioned Localism Bill, that seeks to enable the process of local communities being empowered and taking responsibility for producing new Plans for their locality

**Office for National Statistics (ONS)** - The official national organisation for many forms of statistical data, e.g. the national Census

**Open Space** - All space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs, which can offer opportunities for sport and recreation. They can also act as a visual amenity and a haven for wildlife, and are a crucial element in green infrastructure.

**Planning Policy Guidance (PPG)** - Documents that provide guidance to local authorities and others on national planning policy across a range of issues such as housing, transport, conservation, etc. PPGs are being replaced by the NPPF.

**Planning Policy Statement(s) (PPS)** - Documents that set out Government's national policies on different aspects of spatial planning in England. PPSs are being replaced by the NPPF.

**Previously Developed Land (PDL)** - See definition for *Brownfield*

**Proposal Map (also known as a Key diagram)** - A map which identifies the areas to which policies and proposals in the development plan document relate.

**Public Rights of Way (PRoW)** - A public right of way is a highway over which the public have a right of access along a linear route.

**Ramsar Sites** - Wetlands of global importance, listed under the Convention on Wetlands of International Importance (signed in Ramsar, Iran in 1971). In Babergh, both the Orwell and Stour Estuaries are designated as Ramsar sites.

**Retail Study (Colliers CRE)** - A study completed in 2008 that provide valuable up-to-date information about towns in the district, and statistics are available that indicate the importance of leisure and tourism to the local economy.

**Regionally Important Geological or Geomorphological Sites (RIGGs)** - Sites identified for their geological or geomorphological interest, according to certain criteria. They are protected through the statutory development plan.

**Regional Spatial Strategy (RSS)** – Formerly provided the The broad spatial strategy (i.e. regional plan) for the region prepared by the former East of England Regional Assembly, and that forms part of the statutory Development Plan. The East of England RSS was adopted in May 2008 and abolished following the Localism Act in January 2013. ~~The Localism Bill, when enacted, will abolish Regional Strategies including the East of England Plan.~~

**Saved Policies / Saved Plan** - Policies within the Babergh Local Plan Alteration No.2 2006 and the Suffolk Structure Plan that have been saved for a period of time to allow transition to Local Development Documents.

**Scheduled Ancient Monument (SAM)** - A scheduled monument is a 'nationally important' archaeological site or historic building, given national protection.

**Section 106 (S106) Legal Agreements** - Also known as 'Planning Obligations', these are legally binding agreements entered into by the local planning authority / authorities and a developer / landowner, with the express purpose of mitigating specifically identified adverse impacts of a particular development

**Site Specific Allocations** - The allocation of sites for specific or mixed-uses. Policies will identify any specific requirements for the site. The allocations form part of the Development Plan and will be set out in a Site Allocations DPD.

**Site of Specific Scientific Interest (SSSI)** - A SSSI is a conservation designation denoting a protected area in the United Kingdom. These sites are protected for their biological or geological / physiographic interests.

**SME (Small and Medium Sized Enterprises)** - Small and medium enterprises (also small and medium businesses, SMBs, and variations thereof) are companies whose headcount or turnover falls below certain limits (headcount for medium size < 250; small size < 50; micro < 10).

**Spatial Planning** – The Core Strategy will 'join up' town planning and land use issues with plans and strategies of other stakeholders and service providers that deal with community issues such as health, community safety, housing, employment, community development, education, transport, the environment and regeneration. This is called spatial planning, and ensures development and

investment decisions are guided by the objectives and long-term vision for the District. Spatial planning is not limited to things that the District Council control, therefore working with other partners and agencies will be essential.

**Special Area of Conservation (SACs)** - Sites of European importance for nature conservation designated under European law by the Conservation of Natural Habitats and Wild Flora and Fauna Directive

**Special Landscape Areas (SLAs)** - A Special Landscape Area is a local, non-statutory conservation designation used by local government to categorise sensitive landscapes.

**Special Protection Areas (SPAs)** - Sites of European importance for nature conservation designated under European Council Directive 79/409/EEC on the Conservation of Wild Birds (the Birds Directive)

**Statement of Community Involvement (SCI)** - A document setting out the methods by which local authorities will involve local communities in the preparation of Local Development Documents and development control decisions. The SCI is not part of the Development Plan but it is a Local Development Document and is subject to independent examination. Babergh District Council formally adopted its SCI in December 2006.

**Strategic Environmental Assessment (SEA)** - A systematic assessment of the environmental effects of a draft plan. SEAs are open to public consultation and are produced in accordance with national and European regulations.

**Strategic Housing Market Assessment (SHMA)** - A study completed in 2008 and updated in 2010 that looked at the Ipswich Housing Market. The aim of the study was to look at how the Ipswich housing market area operates and what is driving it. The SHMA will be part of the LDF evidence base.

**Strategic Housing Land Availability Assessment (SHLAA)** - An item of the evidence base required under the current planning system / best practice, which sets out to demonstrate that there is sufficient housing land supply available within a local planning authority's area to meet the housing targets established for that area. Although site specific by nature, this does not / can not allocate sites for development

**Suffolk Haven Gateway (SHG)** - See 'Haven Gateway' above

**Supplementary Planning Document (SPD)** - A supplementary Local Development Document that provides further detail of policies in the Development Plan Documents or of saved Local Plan policies. They do not form part of the Development Plan. Babergh District Council has adopted SPDs on Affordable Housing, Safeguarding of Employment Land and the Hamilton Road Quarter, Sudbury.

**Sustainable Development** - A commonly accepted definition of Sustainable Development, based on the 1987 Brundtland Commission, is development which enables people to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations. The Draft NPPF (July 2011) re-states this definition and goes further to clarify that this applies to planning for prosperity, planning for people and planning for places (paragraph 10).

**Sustainability Appraisal (SA)** - An appraisal that must be carried out on LDD documents. They promote sustainable development by assessing the economic, environmental and social effects of planning policies.

**Strategic Environmental Assessment** - Similar in nature and in some purposes to SA (see above), this process is required under a European Directive, 'on the assessment of the effects of certain [significant] plans and programmes on the environment'

**Soundness / Tests of Soundness (see also Examination in Public - EiP)** - Statutory LDDs are subject to an independent, external EiP by an Inspector appointed by the Secretary of State. The purpose of the examination is to assess whether the document is 'sound'. 'Sound' in this sense basically means fit for purpose. At an EiP those who wish to make a representation seeking a change to the document will need to show how that document is unsound and what needs to be done to make it sound. In order to assess this, the Inspector will assess the document against certain 'Tests of Soundness'. The purpose is to ensure that the whole plan is 'sound' in relation to all the legal and policy criteria it has to meet.

**Tree Preservation Order (TPO)** - A Tree Preservation Order is an order made by a local planning authority which makes it an offence to cut down, top, lop, uproot, wilfully damage or wilfully destroy a tree without the planning authority's permission. The purpose of the Tree Preservation Order is to protect trees that make a significant impact on their local surroundings in terms of amenity.

**Urban Fringe** - Predominantly open land on the edge of an existing urban area.

**Use Class Orders** - The Use Class Order puts uses of land and buildings into various groupings that have similar implications for the amenity of the area, for example, B Use Classes are defined as follows: Class B1 Business (incl. offices and light industrial); Class B2 General Industrial; Class B8 Storage and distribution. (Note: There are no Classes B3 – B7).

**Windfall** - Windfall sites are those housing developments which have not been specifically identified (as available / suitable) and allocated in the Local Plan / BDF process. They are sites that have unexpectedly become available and could include, for example, large sites resulting from a redevelopment or small sites such as a residential conversion or the creation of a new flat over a shop.

**Note: Appendix 1 will be updated following publication of the NPPF prior to further consultation.**

## APPENDIX 1

### 2006 Local Plan Policies to be replaced by Part 1 of the new the Babergh Local Plan: Core Strategy and Policies

1. The Babergh Local Plan, Alteration No 2 was adopted in 2006. To ensure continuing planning policy coverage during the transition from the adopted Babergh Local Plan (2006) to the new Babergh Development Framework, the Council applied to the Secretary of State (GO-East) to 'save' the majority of policies contained in the Babergh Local Plan Alteration No. 2 until such time as the new Babergh Development Framework is adopted. Confirmation has been received from the Secretary of State that *most* of the policies contained in the current adopted Babergh Local Plan are 'saved' (and thereby remain in place) whilst others expired on 2<sup>nd</sup> June 2009. This confirmation is in the form of a Direction under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004. For more information please view our website via the following link:

<http://www.babergh.gov.uk/Babergh/Home/Planning+and+Building+Control/Local+Plan/List+of+Saved+Policies.htm>.

2. The Council has assessed the Local Plan policies (saved policies) to determine which of these policies will be superseded by the policies in the Core Strategy. The table below indicates which of the Local Plan policies will be replaced by Core Strategy policies. Local Plan policies not replaced by Core Strategy policies will remain until these are replaced by subsequent Development Plan Document policies. **The weight given to these remaining policies will depend upon how consistent they are with the NPPF (published March 2012).**

Local Plan Policy Ref	Policy Subject
LP01	Planning Obligations
EN02 & EN04	Species and Biodiversity Action Plan
EN06	Habitat Creation
EN09	Conservation of Energy
EN10	Renewable Energy
EN13	Water Conservation
EN21	Provision of storage/recycling facilities
HS01	Towns
HS02	Villages
HS03	Non-sustainable and Sustainable Villages
HS04	Countryside
HS06 & HS07	Rural Exception – Local Needs Housing
HS08	Affordable Housing
HS09	Affordable Housing
HS26	Ipswich Policy Area
HS27	Housing Density and House Type
HS29	Residential Caravans
HS30	Design of New Housing
HS34	Smaller Dwellings
EM01	General
EM04	Former 'British Sugar' Site, Sproughton
EM05	Wherstead Office Park, Wherstead
EM06	Land at Brantham Industrial Area
CR01	Landscape Quality

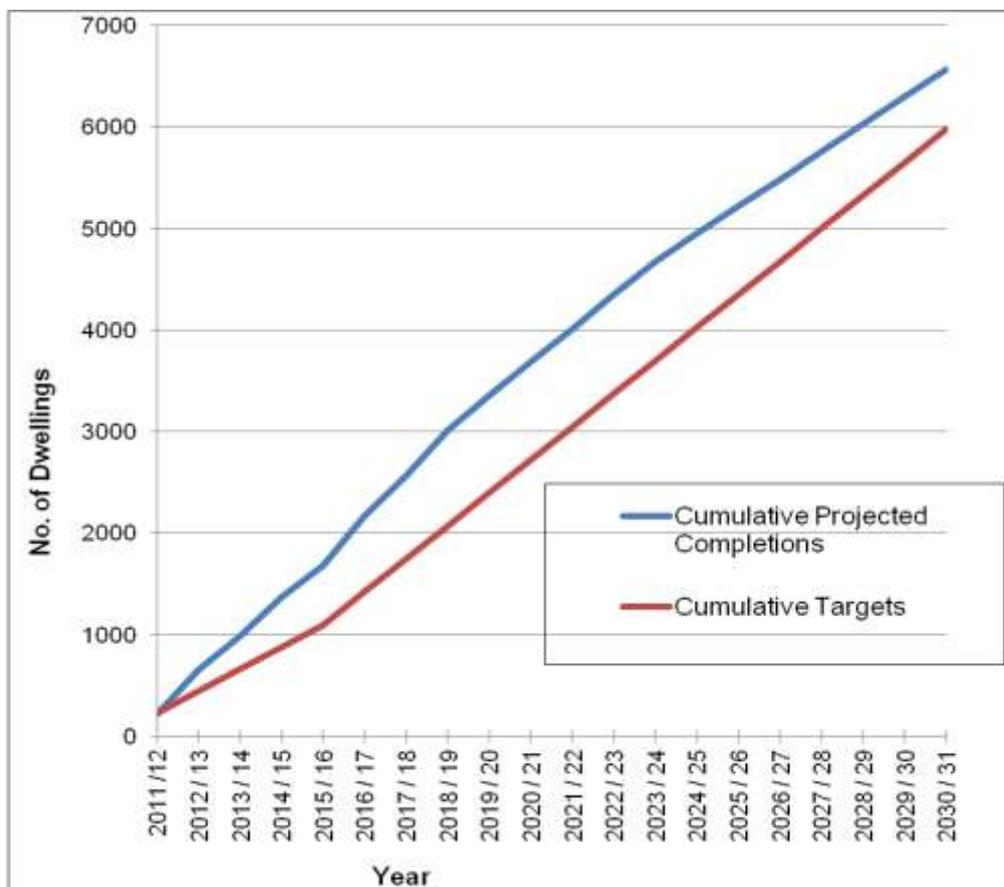
CR20	Protecting Existing Village Facilities
RE01	Sports Facilities
RE02	New Playing Fields
TP01	Pedestrians
TP02	Public Right of Way
TP03	Provision of Cycle Routes
CP01	Chilton Mixed-Use Development Package

WORKING DRAFT

## APPENDIX 2

### Housing Trajectory

The Core Strategy and Policies document sets a local target of 300 dwellings per annum in the District. The trajectory will be updated in the Annual Monitoring Report. These figures will indicate if housing delivery in the district needs to be managed and if it is necessary to review housing policies in the Babergh Development Framework.



Year	Completions and Commitments	Strategic Allocations	New Dwellings (including broad direction of growth)	Windfalls	Cumulative Projected Completions	Cumulative Targets
2011/12	214	0		0	214	220
2012/13	410	0		35	659	440
2013/14	292	0		35	986	660
2014/15	347	0		35	1368	880
2015/16	280	0		35	1683	1100
2016/17	217	95	70	100	2165	1425
2017/18	135	95	70	100	2565	1750
2018/19	185	95	70	100	3015	2075
2019/20	70	95	70	100	3350	2400
2020/21	70	95	70	100	3685	2725
2021/22	70	45	120	100	4020	3050
2022/23	70	45	120	100	4355	3375
2023/24	70	35	120	100	4680	3700
2024/25		50	120	100	4950	4025

2025/26		50	120	100	5220	4350
2026/27		50	120	100	5490	4675
2027/28		50	120	100	5760	5000
2028/29		50	120	100	6030	5325
2029/30		50	120	100	6300	5650
2030/31		50	120	100	6570	5975

WORKING DRAFT

## APPENDIX 3

**NOTE:** Consequential updates to Appendix 3 have been made in parallel with and to reflect the Proposed Main Modifications, and whole of the updated Appendix 3 will appear with the Schedule of Minor Modifications for information.

WORKING DRAFT

**APPENDIX 4: Accessing Key Services Map (2010)**

WORKING DRAFT