



Report to Babergh District Council

by Phillip J G Ware BSc(Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO BABERGH LOCAL PLAN 2011-2031

PART 1 – CORE STRATEGY

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 6 November 2012

Examination hearings held between 5 and 15 March 2013, and on 25 September 2013

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Abbreviations used in this report

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
ATLAS	Advisory Team for Large Applications
BREEAM	Building Research Establishment Environmental Assessment Method
BUABS	Built Up Area Boundaries
CD	Core Document
CS	Local Plan 2011-2031 Part 1 – Core Strategy and Policies
DPD	Development Plan Document
LDS	Local Development Scheme
LP	Local Plan 2006
MM	Main Modification
NPPF	National Planning Policy Framework
PPTS	Planning Policy for Traveller Sites
RS	Regional Strategy for the East of England
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPA	Special protection Area
SSSI	Site of Special Scientific Interest

Non-Technical Summary

This report concludes that the Babergh Local Plan 2011-2031, Part 1 – Core Strategy provides an appropriate basis for the planning of the District providing a number of modifications are made. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the Plan.

The key modifications can be summarised as follows:

- Removing references to the former Regional Strategy
- Clarification of the approach to Core and Hinterland Villages
- Clarification on Land Allocation Numbers
- Providing an element of flexibility in relation to allocations at Chilton Woods, Sproughton and Hadleigh
- Clarification of the approach towards retail development in Hadleigh town centre
- Provision of additional off-site highway mitigation at the Sproughton site
- Allowing for the possibility (subject to viability evidence) of additional greenfield housing development adjacent to the Brantham site
- Clarification of renewable energy policy
- Inclusion of additional text to support the approach towards gypsy and travellers, in line with national policy
- Additional emphasis on viability in relation to affordable housing policy

All of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the public examination. They do not alter the thrust of the Council’s overall strategy.

Introduction

1. This report contains my assessment of the Babergh Local Plan 2011-2031 Part 1 – Core Strategy (CS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan’s preparation has complied with the duty to co-operate, recognising that there would be no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (NPPF) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted composite CS (November 2012).
3. My report deals with the main modifications that are needed to make the CS sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan

unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.

4. The main modifications have been subject to Sustainability Appraisal (SA) and public consultation and I have taken the consultation responses and the findings of the SA into account in writing this report. The main modifications do not include changes proposed by the Council that I consider are not needed for soundness/legal compliance reasons. For the avoidance of doubt, the report makes no comment about the merits of any additional changes recommended by the Council that are not specifically mentioned.
5. My report also takes account of responses to consultations held during the examination period in respect of the revocation of the East of England Plan (RS) (January 2013) and the publication of the Household Interim Projections (2011-2021) by the Department for Communities and Local Government (April 2013).

Assessment of Duty to Co-operate

6. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan’s preparation.
7. The Council’s ‘Statement of Compliance with the Duty to Co-operate’ (CD E10) sets out in detail how the authority has participated in many partnerships and joint projects or working groups with other local authorities and relevant organisations during the preparation of the CS.
8. In particular, as a result of the close functional relationship with Ipswich and the importance of the port of Felixstowe there are well established mechanisms for ongoing discussion between authorities. This is particularly illustrated by the Ipswich Policy Area (IPA), where four authorities have worked together with the County Council for many years as part of the policy making process.
9. There are numerous examples of joint working to produce documents forming part of the evidence base. Furthermore it is clear that other local authorities and relevant organisations have had full opportunity to engage with the Council at all key stages in the process of preparing the CS. This is especially relevant in the case of major sites lying close to the borders of Babergh District. The Council has clearly taken into account the wider strategic context and the interrelationships with neighbouring areas, particularly in terms of housing markets and employment patterns. The CS takes a broadly consistent and complementary approach in relation to adopted and emerging plans produced by neighbouring authorities.
10. I am satisfied that the Council has engaged constructively, actively and on an ongoing basis with relevant local authorities and organisations and I conclude that the duty to co-operate has been met.

Assessment of Soundness

Main issues

11. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified the following main issues upon which the soundness of the CS depends.

Issue 1 – Is the overall spatial strategy soundly based and does it present a clear spatial vision for the District, appropriate to the needs of the area, in accordance with national policies?

The implications of the revocation of the Regional Strategy

12. The East of England Plan (the RS) was revoked in January 2013, after the CS was submitted for examination but before the hearings were held. There were obviously a range of implications arising from this decision, but the intention to revoke the RS had been known for a substantial period of time, and had led to a decision by the Council in 2010 not to go ahead with an earlier ‘Preferred Options’ version of the CS, but to revise the approach to reflect the pending revocation and in favour of an employment-led plan.
13. The removal of regional housing targets led to the need to consider the position at a local level, rather than allowing the process to be driven regionally. The Council objectively assessed housing need and a major growth review was carried out, including a range of different housing scenarios. A locally-determined decision was then made as to what level of housing growth was appropriate. In coming to this decision, the evidence base for the RS was still of some relevance, although with the passage of time it is of much less relevance due to the publication of the SHMA 2012 (CD C20) and various household/population projections.
14. There were also implications arising from the RS revocation for the approach towards gypsies and travellers, and for the co-ordinated planning of the wider Ipswich area. The former is now to be considered at a more local level and, in the light of co-operative working with other authorities. The arrangements for the wider Ipswich area have continued under the aegis of the Ipswich Policy Area Board.
15. It was necessary to refer to the RS in the CS as submitted for examination, as it was still part of the development plan. However, given the considerable lead-in time, the abolition of the RS has had little impact on the emerging CS, although a significant number of modifications are needed to remove references to the RS from the document. **(MM 1, 2, 3, 8, 9, 10, 11, 12, 30, 37)**

Does the CS contain an appropriate spatial vision and objectives for the District, in terms of environmental, economic and social impact, and in relation to national guidance, and do the policies in the CS reflect this vision?

16. The spatial vision of the CS (page 13) refers to the local character and distinctiveness of the area, which would be further enhanced by a strong economy and a healthier environment. The vision further refers to a well connected network of places, made up of mixed and balanced communities.

At the highest level, this is a clear and appropriate vision, which is then fleshed out by a series of eight Objectives.

17. These eight Objectives relate to the roles of sustainable development as set out in the NPPF. The economic role is addressed by Objectives 2, 3 and 8; the social role by Objectives 1, 4, 7 and 8; and the environmental role by Objectives 5 and 6. Each Objective identifies critical success factors to guide the monitoring of the CS. There is also an overarching policy (CS0) which applies the presumption in favour of sustainable development.
18. Overall the vision of the CS is consistent with national guidance and is based on a sound and thorough analysis of the current situation in the District, as demonstrated in the comprehensive evidence base. The CS provides locally suitable and appropriate objectives, including those in respect of sustainable development.

Does the Sustainability Appraisal (SA) provide a robust and thorough assessment of the CS and is there a clear audit trail demonstrating how and why the preferred strategy was selected, including appropriate consultation with the public, representative bodies, neighbouring authorities, service and infrastructure providers and other interested parties?

19. The aim of SA is to promote sustainable development by ensuring that environmental, social and economic factors are considered during plan preparation. The CS has been subject to SA throughout its preparation up to the time of the Hearing (CDs D11, D12, D13, D14, D15a, D15b, D16, E05, E06a, E06b, E06c and E07). In addition the Main Modifications were subject to a further Addendum SA in May 2013.
20. At each stage of its development the emerging CS policies were assessed against twenty three SA objectives, and consideration was given as to whether and how the policies would further the Objectives. The SA was subject to consultation in the same way as the CS itself (CD E05 and CD E12). There is nothing to suggest that the SA was undertaken other than in accordance with the Regulations.
21. The conclusion of the SA, up to and including the Main Modifications, is that the CS is robust in terms of its sustainability. Its policies provide certainty and clarity.
22. It is important that reasonable alternatives to the selected strategy and the reasons for rejecting them are set out clearly. This was done in a range of documents (CD E12, D03, D06, D07, D08, D09). These are comprehensive in their coverage of the processes undertaken, including how and why the preferred strategy was selected, bearing in mind the need for realistic delivery objectives. The addendum to the SA (June 2012) (CD E07) provided a summary of the alternatives considered, a timeline, and a brief summary of the reason why these were not selected.
23. Taking all of the above matters together, the Plan has been subject to adequate Sustainability Appraisal.

Does the Core Strategy provide an appropriate level of detail in relation to strategic sites?

24. Details of strategic sites are set out in the CS. There are three mixed use sites (Hadleigh, Ipswich Fringe and Chilton Woods), two are employment sites (Wherstead and Sproughton), and one is a regeneration site (Brantham). These are discussed below in separate sections.
25. Each of these sites (the boundaries of which are shown on a plan) has a specific policy related to it. These policies identify the approximate quantum of the various uses, with more details to be provided in a future masterplan. The CS policies retain a degree of flexibility whilst giving sufficient detail at this strategic stage to assist in bringing forward the key sites.
26. A different approach has been adopted in relation to the Sudbury/Great Cornard Broad Location For Growth (policy CS3a). In the case of this mixed use development, no site boundary has been identified (it is simply shown on the Key Diagram) and it is not a precise allocation. However the approach is sound in that development on this site is not anticipated until the middle/late plan period (unless it is needed earlier). Unlike other more precisely defined strategic sites, the boundary and content of this development would be progressed through a Site Allocations DPD.
27. Overall the approach of the CS is sound. The extent of the detail given for strategic sites gives added certainty at this stage and will facilitate development.

Is the strategy sufficiently flexible to respond to unexpected changes in circumstances?

28. Especially given the comparatively detailed policy approach towards the majority of the strategic sites, it is important that the CS strikes a balance between certainty and being over-prescriptive. All the strategic allocation policies, along with those related to housing, affordable housing and employment, have elements of flexibility contained within the policies themselves.
29. In addition, there is flexibility specifically built into policy CS2, dealing with the overall growth strategy and the monitoring and review of housing delivery. The CS also sets out a flexible approach towards a range of uses to be achieved.
30. Aside from the strategic sites, the CS does not set out site allocations or any development management policies. As these elements of the overall development plan are produced they can respond to changing circumstances, which may also trigger a partial review of the CS itself if the flexibility in the policies proves inadequate.

Does the Core Strategy provide an adequate framework for the preservation and enhancement of heritage assets?

31. The English Heritage Guide ‘Heritage in Local Plans - How to create a sound plan under the NPPF’ gives detailed advice which is particularly apposite given the wealth of built and natural heritage features in Babergh. The importance of heritage assets is also emphasised in the NPPF, which provides that local

plans should contain a positive strategy for the conservation and enjoyment of the historic environment.

32. There are numerous references to the built and natural environment in the CS, including an Objective and various references in the text to heritage assets, including their importance for residents, businesses and tourism. (Minor modifications have been proposed to a number of these references to address comments made by English Heritage.) However there is only one policy reference to the need to respect the landscape, townscape and historic assets (Policy CS10). An important modification is that the policy should specifically refer to heritage assets (**MM 33**) in accordance with national policy.
33. In some respects the presence of only one policy reference to this issue may be surprising in an area such as Babergh. However, given the strategic nature of the plan, the CS strikes an appropriate balance between the need for new development and the protection of the District’s heritage in general terms. It would provide a sound base for subsequent development management policies, Masterplans and Neighbourhood Plans.

Are critical decisions which should be made in the CS being delegated to other DPD documents?

34. There are many references in the CS to matters which will be addressed in subsequent DPDs, Masterplans and Neighbourhood Plans. I was concerned to ensure that all the matters which need to be addressed at the strategic level, as advised in paragraph 156 of the NPPF, had been addressed at this stage.
35. I explored the particular concern that a specific figure (1,050 dwellings) was allocated in policy CS2 for Core and Hinterland villages, but that no further detail of the location of these dwellings was given. Whilst I can understand the concern in many villages that their settlement might receive too much or too little housing, and I sympathise with the uncertainty that this may cause, this matter is best left to a Site Allocations DPD, prepared in consultation with local communities.
36. Overall, the CS does not unreasonably delegate critical strategic decisions to subsequent documents.

Conclusion

37. Subject to the above modifications, the overall strategy of the CS is soundly based and presents a clear spatial vision for the District, appropriate to the needs of the area, in accordance with national policies.

Issue 2 – Is the categorisation of settlements suitable, appropriate and supported by a robust evidence base?

The settlement hierarchy

38. The settlement hierarchy for the District is based on an overall pattern established in the LP 2006, and this continues largely unchanged in the CS. This is unsurprising as the essential character of the District, with two market towns and the edge of Ipswich surrounded by rural areas and small settlements, has not fundamentally changed for many decades.

39. The settlements outside the urban areas have been classified by the CS into two categories - Core Villages and Hinterland Villages, as described in the CS (Section 2). This classification is of particular significance in relation to the different policy approach adopted towards these categories of settlement. The approach to defining the hierarchy and establishing inter-dependencies between settlements was based on a series of workshops with Town and Parish Councils, with those not attending being asked for written comments – leading to 80% coverage. The remaining gaps were completed based on the local knowledge of Council officers.
40. There has been criticism of this exercise and its results, and certainly there are some apparent anomalies. (The apparent lack of linkage between Babergh settlements and Manningtree being perhaps the most obvious.) However no exercise in local community engagement of this sort is ever likely to achieve 100% coverage, nor are the results necessarily going to be entirely logical. However the exercise was conscientiously pursued and the results have the great advantage of being locally determined. They can be revised in future as facilities in settlements and the way in which they inter-relate change.
41. Policy CS1 as submitted was not entirely clear that Core Villages would act as a focus for development, with Hinterland Villages also accommodating some development. Modifications are necessary to make this explicit (**MM 14**), to give greater clarity to the approach towards the definition of Core Villages (**MM 4**), and to explain that settlements can appear in more than one functional cluster (**MM 6**).
42. Overall, the definition of Core Villages and Hinterland Villages (as shown on Map 4), falling within functional clusters, is soundly based, as demonstrated by a range of supporting evidence (CD D19, D39, D09 and D08).

Specific settlements

43. The position of specific settlements within the hierarchy has been considered. The evidence base, most importantly the results of the local consultation exercise, supports the allocation of particular settlements to the tiers in the hierarchy. This needs to be clarified further by some explanatory text related to the process and to the assessment of the cumulative impact of proposals (**MM 7 and MM 27**). Modifications to policy CS6 are needed to address the effect on heritage assets in Core and Hinterland Villages (**MM 29**).
44. The designation of Brantham as a Hinterland Village, with East Bergholt as the related Core Village, could lead to pressure for development in East Bergholt, with consequent conflict with environmental and conservation strategies. However any such conflict could be addressed under other policies (especially CS6 as modified above). Given the current level of services in Brantham, its designation as a Hinterland Village, whilst needing some additional justification in the text (**MM 5**), is supported by the evidence base. The consideration of Brantham as a Hinterland Village was complicated by reference in the text to Manningtree, and this should be removed to more accurately reflect the results of the workshop exercise described above (**MM 5**).

Built Up Area Boundaries (BUABS)

45. In order to inform one element of the settlement hierarchy, it is necessary to clarify that the BUABs remain those as defined in the LP 2006. Although the policies both within and beyond the BUABs will be different to the earlier LP, the boundaries themselves are a useful starting point and can be modified in the context of future elements of the CS (**MM 13 and MM 28**).

Conclusion

46. Taking the above matters together, and subject to the modifications which are needed to make the CS effective, it is concluded that the CS’s categorisation of settlements is sufficiently justified and consistent with the local evidence base.

Issue 3 – Does the CS make adequate provision for sustainable development?

Does the CS reflect the national policy presumption in favour of sustainable development?

47. In the light of the publication of the NPPF and the emphasis therein on the importance of sustainability, the Council included an overarching policy (policy CS0) in the CS submission version. This provides a sound basis for translating the national presumption in favour of sustainable development into a local context. The subsequent strategic policies of the CS build on this overarching policy to address the three roles of sustainable development set out in national policy.
48. Various economic policies (particularly CS2, CS13 and CS11) provide a framework within which the CS's ambitious target of 9,700 jobs can be achieved. The objective of ensuring a supply of appropriate land to support this growth is addressed by the inclusion of strategic employment sites and other allocations.
49. The social role is addressed particularly by the target of 5,975 new dwellings, to provide a supply of housing to meet the needs of present and future generations. The identification of 2,500 of these dwellings in sustainable locations well related to Sudbury, Ipswich and Hadleigh is welcomed. The location of the remainder, in part guided by policy CS14, would seek to maintain mixed and balanced rural settlements.
50. The environmental role is of particular importance given the wealth of heritage assets and natural environment in Babergh. With some modifications set out in this report, the strategic environmental role is addressed by a range of policies (in particular CS7 and CS10).

Does the evidence base demonstrate that the development strategy is compatible with the protection of the natural environment?

51. The Sustainability Appraisal/Strategic Environmental Assessment Report (CD E05) addressed the impacts of the CS in terms of a range of environmental objectives. The most significant negative effect is the need to take greenfield land for development – with consequent effects on landscape and biodiversity – to accommodate growth. This tension is inevitable in a broadly rural area

aiming at managed growth, but the CS and the evidence base demonstrate a clear appreciation of the issue and recognition of the need to reduce and mitigate the impact.

52. The Ipswich Fringe site was the subject of a Habitats Regulation Assessment Screening report (CD E04) in view of its proximity to a SPA/Ramsar site. The report concluded that there are not likely to be any significant effects on the designated site arising from water pollution.
53. The Brantham Regeneration Area is close to an SPA, SSSIs and an AONB, as well as a flood risk area. However measures to mitigate effects are set out in the policy, and the SA/SEA did not identify any conflicts which could not be overcome.
54. Potential development at currently undefined locations in Core and Hinterland Villages can be assessed either in a Site Allocations DPD or by way of consideration of planning applications on windfall sites. This would be achieved in the light of CS strategic policies related to environmental issues.
55. Overall, the substantial evidence base demonstrates that the approach of the CS is compatible with the protection of the natural environment.

Does the CS give clear guidance on sustainable construction and, if so, are the targets evidence based and justifiable?

56. In the light of national policy supporting the transition to a low carbon future and the encouragement of the use of renewable resources, the CS includes an overarching sustainability policy (CS0) and more detail at policy CS10. In addition, there are policies on sustainable design and construction (CS7) and renewable and low carbon energy (CS8).
57. The NPPF states that local requirements for building sustainability should be consistent with nationally described standards. Policy CS7 does this by requiring all new non-residential development to achieve BREEAM ‘Excellent’ standard – the feasibility of this approach is supported by the evidence base (CD K04). The evidence confirms that the costs of this approach should only have a marginal impact on the overall economic viability of new building in the District. Modifications are needed to clarify the standard to be achieved and provide guidance as to its applicability (**MM 31**).
58. Policies (CS8 and CS10) related to minimising dependency on fossil fuels and adopting a sustainable approach to energy use are in line with the NPPF policy to increase the use and supply of renewable and low carbon energy. These policies are justified by the evidence base, particularly the Technical Background Document on Environment and Climate Change (CD K04). For consistency with national policy, the Note to Policy CS8 needs to be modified to widen the scope of renewable energy and explicitly balance the benefits of renewable energy proposals against any landscape of heritage disbenefits (**MM 32**).
59. Water conservation is addressed, in part, by the BREEAM requirement (policy CS7) and by a more general policy (CS10) aimed at minimising demand for potable water. Flood risk is addressed strategically by policy CS10, based on evidence at CD K04 and CD D32.

60. Overall, the CS’s approach is reasonable and realistic taking into account the associated additional costs on new development and is locally justified and deliverable.

Does the CS address the minimisation of car usage and a shift to other more sustainable forms of transport?

61. In a largely rural area, with two market towns and a much larger town just beyond the administrative boundary, a reduction in reliance on the private car will always be challenging. However national policy recognises that local circumstances need to be taken into account.
62. The main focus for growth in the CS is within or adjacent to existing urban centres. The CS therefore seeks to guide new development to locations well related to services, facilities and public transport networks. The relevant policies for these areas include the maximisation of opportunities for alternative transport modes.
63. Outside these main areas, the CS seeks to focus development in villages with reasonable transport links and service provision. This is in line with national policy to support and develop local services.
64. Given the inherent difficulties in reducing car dependency in an area such as this, the CS addresses the issue both by the location of major development and by the overall strategy of locating smaller scale development in specified settlements. Policies related to Travel Plans and more detailed matters can be left to future DPDs under the umbrella of the CS.

Conclusion

65. Overall, the CS makes adequate provision for sustainable development.

Issue 4 – Does the CS help to sustain and strengthen the local economy and is the approach soundly based and deliverable?

Does the CS set out a clear economic vision and strategy for the area which positively encourages sustainable economic growth?

66. The basic vision of the CS is that future growth in the District is to be employment led, with an increase in the proportion of jobs to housing growth. The approach takes account of the proximity of the major employment centre at and around Ipswich. It could not realistically do otherwise.
67. This vision is fleshed out at Policy CS2, which sets out a clear strategy by way of strategic allocations, including mixed use development locations with an employment element, and strategic sites especially around the Ipswich fringe. The co-location of employment with new housing is a consistent and sustainable theme throughout the CS. There is also encouragement of the rural economy (especially in relation to tourism) and recognition of the role of towns, historic and coastal villages (policies CS11 and CS13).

Is the scale and distribution of employment growth in the CS justified by the evidence base, and is it deliverable?

68. There are no longer any external employment land targets to be followed, so the forecast requirements in the CS are based on the Council’s latest assessment of need, current circumstances and potential over the CS period. There is a considerable evidence base related to employment and to the growth in some sectors of the local economy (esp. CDs C15, K15, D40 and K17). The evidence addresses the local and sub-regional context, and deals effectively with the needs of the Ipswich fringe area, where much of the projected employment would be located.
69. A number of the major employment growth locations are existing large sites in urgent need of investment (e.g. Sproughton and Brantham), but as well as being brownfield sites in need of regeneration they are also in generally sustainable locations close to centres of population. Other employment locations, such as Hadleigh and Sudbury, are areas of existing and proposed population, which also provide a good level of services.
70. The scale of the proposed employment growth and its spatial distribution is clearly justified by the evidence base. The deliverability of the strategy depends in large part on a number of major sites, which are considered in later sections of this report. However overall there are reasonable prospects of delivery over the plan period.

Are the employment policies and proposals consistent with national policy?

71. The vision and strategy of the CS accords with national policy to objectively assess the employment needs of the District, and this is clearly supported by the evidence base. In relation to the major employment sites (discussed later in the report) the Council has been proactively engaging with landowners, developers and residents to try to drive and support sustainable economic development. These efforts have been variable in their effectiveness, for site specific reasons, but the approach is wholly consistent with national policy.
72. A particular concern, given that some major employment sites in the CS were also included in the LP 2006 (but with no progress on the ground) relates to national policy to avoid the long term protection of employment sites where there is no reasonable prospect of a site being used for that purpose. However, in each case (particularly Sproughton and Brantham) the allocations have been specifically reviewed. The reasons for the lack of progress on the ground have been assessed, along with the prospects for the future – the approach of the Council is in accordance with national policy in this respect.

Does the CS provide sufficient guidance on the employment land allocations in terms of phasing and delivery?

73. Each of the new mixed use strategic allocations (Sudbury, Hadleigh and Ipswich fringe) and the strategic employment regeneration policies/allocations (Sproughton, Wherstead Park and Brantham) have delivery targets associated with them. These are discussed below and, although there remains some doubt in a few cases as to the realism of the delivery aspirations, the expectations are transparent and are justified by the evidence base.

Does the CS provide adequate guidance on the scale and location of future retail floorspace?

74. Policy CS11 (as clarified by **MM 27**) sets out a clear hierarchy for the location of a range of uses (including retail) in towns, villages and local centres. The provision of a significant amount of new retail floorspace (to be located sequentially) in Sudbury – the main shopping centre in the District – is provided for in the policy and is justified in the evidence base.
75. Policy CS4 deals with the strategy for Hadleigh, and includes the encouragement of a wide range of uses. This is in line with national policy towards town centres and is supported by the evidence base. However it also provides that small scale refurbishments and redevelopments aimed at enhancing retail quality and consumer choice will be supported in Hadleigh town centre. Since the production of the evidence base a substantial out of centre supermarket has opened in a building with unrestricted A1 permission on the outskirts of Hadleigh. The justification for a policy restriction to small scale developments is therefore not supported by an up to date evidence base, as the effect of this new store on the retail pattern in Hadleigh has not yet been assessed. This restriction would also be generally contrary to the flexible approach of national policy. This needs to be addressed by **MM 19**, which allows for a more flexible approach to development for town centre uses and refurbishments that enhance the retail quality, choice and vitality and viability of Hadleigh town centre.

Does and should the CS seek to proactively manage the tourism economy in the various centres/locations?

76. The CS evidence base recognises the contribution made by employment outside the B Use Class – and therefore acknowledges the contribution of the tourist economy. Given the importance of tourism in the local area, it is perhaps surprising that more focus is not given to the importance of the tourist economy. However the Council’s reasonable approach is that policies CS2 and CS13 give sufficient attention to the promotion of tourist and leisure uses – and that policies dealing in more detail with the tourist economy can appropriately be left to subsequent DPD documents.

To what extent does the CS rely on the Sprites Lane site, which is stated to be allocated in subsequent documents? Is this a reasonable approach?

77. Sprites Lane (a.k.a. IP8) is an area listed in the first part of policy CS2 as an existing employment site. As much of the site is developed (a sixth form college) or is the subject of an outstanding permission, the former LP 2006 allocation is now outdated as there is insufficient potential for it to be allocated as a strategic site. However it remains reasonable to continue to acknowledge the employment potential of the remaining undeveloped land – without giving it a strategic allocation. Should the extant permission not be implemented, this recognition would guide the approach to the more detailed planning which would then be needed.

Conclusion

78. Overall, the strategy for locating new economic development has been positively prepared with the aim of achieving employment growth and

providing for the needs of the District and the wider area. The CS makes adequate provision for development which would help to sustain and strengthen the local economy, based on a sound and deliverable approach.

Issue 5 – Is the overall level of housing provision and its distribution justified and appropriate?

What are the objectively assessed needs for housing in the District and does the Strategic Housing Market Assessment (SHMA) provide a credible evidence base in relation to housing need?

79. There was a suggestion by some objecting to the CS that the Council had simply adopted the housing figures from the former RS. However this is clearly not the case as the abolition of the RS was one factor causing the authority to undertake substantial further work on housing provision, and subsequently base their approach to housing need on that later work. The SHMA (CD C20) and Review 2012 (CD K21) are significantly more up to date than the former RS figures, were undertaken with other authorities in the area, and were the basis of the Council’s housing projections.
80. The SHMA was based on a range of projections to address household growth, which suggested a range of different levels of household growth – between 5,200 and 8,500 to 2031. For sound and transparent reasons (esp. CD K21 and CD C20), the adopted figure of 6,000 is justified by the evidence base. In particular the most accurate projection appears to be 6,600 new households to 2031, given the initial census results, and the 6,000 figure is between the East of England Forecasting Model and the 2010 base approach. It represents a level of growth which would not stifle economic development and will meet housing need. The Household Interim Projections for 2011-2021 (published in April 2013) were assessed but made little difference to the overall range of projections.
81. The overall objectively assessed need for housing is therefore credible and justified by robust evidence of local housing needs/demands and population changes.

Does the CS assist in providing a continuous supply of specific deliverable sites with suitable infrastructure provision sufficient to provide 5 years worth of housing, with an additional buffer of 5%? Is there evidence of persistent under delivery of housing which would mean that the buffer should be 20%?

82. The evidence base clearly demonstrates that the authority has a 5.9 year housing land supply (CD D47) – based on an average target of 304 dwellings per annum, with a 5% buffer.
83. The Annual Monitoring Report (AMR) 2011/12 (CD D47) sets out specific sites which are available, viable and deliverable, and this is reflected in the Housing Implementation Strategy (CD D46). There is every reason to expect that these sites can deliver housing within a five year period. The assumptions underlying the assessment of these sites were tested in the Strategic Housing Land Availability Assessment (SHLAA) update (CD D17).
84. Turning to potential under-delivery, the Council accepts that completions have varied over time. There have been some years where delivery has fallen short but, in a time of economic difficulties, this sort of fluctuation is not surprising.

The extent of under-delivery in some years (CD D46 and D47) is some way from representing persistent under-delivery such that a 20% buffer should be included. It is also noteworthy that the CS provides for a local 10% buffer, rather than the 5% figure required by national policy, and this assuages any lingering doubts regarding delivery. The present housing land supply position exceeds five years and there is no evidence that a 20% buffer is required in the terms of national policy.

Is there compelling evidence that windfall sites are consistently available in order to justify reliance on such sites in the CS?

85. National policy is that, although allowance may be made for windfall sites in the five year supply, there should be compelling evidence that such sites have consistently become available and will be a reliable source of supply.
86. The evidence base, particularly the 2011/12 AMR and the Housing Implementation Strategy (CD D46 and CD D47) suggests that the development of windfall sites has been a significant factor in Babergh over a 15 year period. The level of such contributions has been over 50% and has been delivered in a wide range of locations.
87. The relatively recent restrictive national policy towards development of back garden land might be argued to reduce the potential supply of such sites. However this does not seem likely to be a significant factor as there was a restrictive policy in relation to infilling in the LP 2006. This suggests that the change in national policy may not affect the supply to a great extent.
88. Past windfall figures have, to a degree, been skewed by two specific sites (HMS Ganges and Shotley Marina), which have increased the historic contribution of windfall sites. However the more flexible CS policy towards rural growth may increase the contribution made by windfall sites, and the Council's approach allows for a potential 10% shortfall. These factors should more than balance the contribution of the two specific sites.
89. Overall, the approach of the CS towards windfall sites is robust and justified by the evidence base.

Is the CS sufficiently flexible to respond to changes in circumstances over time, and is there an over-reliance on delivery at large/complex sites?

90. The general approach of the CS seeks a balance of rural (40%) and urban (60%) growth. The evidence base supports this approach, allowing for sustainable rural development and a majority of growth in and close to inherently sustainable urban locations.
91. The allocation of strategic sites at this stage in the CS has clear advantages in terms of comprehensive planning and phasing of these potentially difficult sites, and it reduces the issues related to the future site allocations process. However it does mean that the larger, more complex, sites make up 40% of the total CS figure. The Council considers this does not reflect an over reliance on strategic sites – but it is certainly a high percentage and to an extent these large sites hold the key to the implementation of the strategy.
92. However the existence of monitoring arrangements and contingency responses for the strategic sites, along with the progress which has been made to date,

gives a reasonable degree of reassurance that the dependence on these sites will not jeopardise the overall approach and will give a significant amount of flexibility.

Is there an over-reliance on the site allocations process, with potential delays in housing delivery?

93. The approach to, and importance of, the strategic sites discussed above has the effect of diminishing the reliance on the site allocations process. In addition the CS policies related to Core and Hinterland Villages provide a strategic approach to development in those settlements sufficient to guide development without reliance on a Site Allocations DPD.
94. The reliance on strategic sites is not without risk, but does have the benefit of reducing the reliance on a future allocations document to deliver housing.

Would the CS deliver well balanced, varied housing to support the creation of mixed and sustainable communities?

95. The 60/40 split between urban and rural locations in the CS would assist with supporting the existing urban/rural balance, and attempt to address rural depopulation and imbalances. In addition the CS addresses the provision of affordable housing (policy CS15), and the needs of specific sections of the community (policies CS10 and CS14). The CS proposes an appropriate mix of housing types based on evidence of local need. This is justified and consistent with national policy, and includes sufficient flexibility to take account of changes to need and delivery. At the strategic level, the CS has the potential to deliver well balanced, varied housing and support the creation of mixed and sustainable communities.

Conclusion

96. Various important clarifications (**MM15**) are needed to the land allocation numbers table to reflect the position at some major sites. With this modification, the overall level of housing provision and its distribution in the CS is justified and appropriate.

Issue 6 – Does the CS make appropriate provision for affordable housing?

Does the target for the provision of affordable housing accord with national policy?

97. National policy provides that local authorities should use their evidence base to meet the full, objectively assessed needs for affordable housing. Policy CS15 deals with affordable housing, and is soundly based on a wide range of background studies (incl. CD K07, C18, C19, C20 and C21).
98. In particular the need for affordable housing was assessed in the SHMAs 2008 and 2012. These are robust pieces of work, and demonstrate that the Council’s approach and strategic policy is in line with national policy.

Is the percentage target for affordable housing justified by up-to-date, clear and robust, local evidence of housing needs and economic viability?

99. The evidence base outlined above clearly demonstrates that the overall figure of 35% in policy CS15 is a reasonable and justified requirement. In

particular the SHMA 2012 (CD C20) identified a need of 134 net affordable units annually - 45% of the total. The SHMA follows the approach of current national policy, whilst retaining a similar approach to the earlier document (CD K07).

100. Building on that position Viability Studies in 2009 and 2012 (CD C18 and C21) indicated that an overall level of 35% affordable housing is reasonable and deliverable. The earlier of these studies was a joint piece of work commissioned by three authorities, although the update was undertaken for Babergh District alone – representing a recognition of the stage that the other authorities had reached in the plan preparation process. The 2012 Viability Study is a robust piece of work, following the RICS 2012 Guidance and the Local Housing Delivery Group Guidance (CD K10 and K11).
101. The historic evidence is that, since the 35% figure was set in 2006, around 30% of completions were affordable housing. Although this is not persuasive in itself, it does serve to indicate that the policy ambition is broadly achievable.
102. Although the policy sets a potentially challenging target given past performance and market conditions, it is not unrealistic over the period covered by the CS. Overall, the evidence base underlying the 35% affordable housing policy is supported by recent, robust, local evidence.

Does the policy provide sufficient flexibility, if viability is an issue for a particular scheme?

103. There has been concern expressed that the policy approach of seeking 35% for all residential developments (with individual targets in some specified areas) is inflexible.
104. It is important that there is scope for site specific circumstances which may affect economic viability to be taken into account in each proposal. In the light of this the text of the policy refers to situations where viability is a proven issue, and allows for evidence based negotiation in specific cases. The policy is sufficiently flexible to take account of changing market conditions over time, and accords with national policy.

No overall numerical target is specified in the CS. Does the percentage target offer an appropriate, transparent figure by which affordable housing progress can be monitored across the plan period?

105. There was a numerical target included in the emerging CS, but this was not required by national policy and, as I understand it, appears to have been unrelated to need, housing trajectory or viability. The decision to remove it was therefore sensible.
106. Instead the CS demonstrates the expected rate of affordable housing delivery for the plan period, by way of the Housing Implementation Strategy (CD K05) and trajectory. This can be monitored and reviewed.
107. Overall, the percentage target is clearly supported and transparent, and allows for easy monitoring. Nothing would be gained by reverting to a numerical target.

Is the approach to defer individual targets for new Directions of Growth and Core Villages reasonable, and does it provide a sufficient level of certainty?

108. The evidence base demonstrates that there is a particularly high level of need in some areas, with limited recent delivery (e.g. Lavenham). Within the overall framework set by policy CS15, the evidence suggests (CD C21 and K09) that there could be some scope to increase affordable housing requirements in some Core Villages. If this were done through future DPD documents it would be in line with policy CS15 and would be reasonable.
109. The Sudbury/Great Cornard Direction of Growth does not have any boundaries at present, and development in other locations such as Core and Hinterland Villages has yet to be allocated. It is accordingly reasonable to set detailed targets at a later stage. Higher targets, if any, would be tested as part of future development plan documents. This approach, subject to viability evidence (emphasised by **MM 35** which makes clear the role of individual viability assessments), is reasonable, whilst providing a sufficient level of certainty at this stage.

Conclusion

110. Overall, the CS makes appropriate provision for affordable housing and provides a suitable level of detail.

Issue 7 – Does the CS adequately address the accommodation needs of the travelling community?

Does the CS accord with the requirements of national policy?

111. The CS takes account of Planning Policy for Traveller Sites (PPTS), subject to some additional explanatory text to more clearly explain the approach (**MM 34**).
112. Key to the national approach following the revocation of the former RS targets is the need for local authorities to make their own assessment of need and to plan for sites over a reasonable timescale. The evidence base in Babergh is still evolving and it suggests a very limited need in future, as in the past. With that background, the progress which is being made is sufficient at this stage.
113. The Gypsy and Traveller Accommodation Assessment 2007 (GTAA) (CD C11) is now somewhat dated, although work on an update is well advanced. The GTAA update will assess needs over a 15 year period, during which time it will obviously need further updating as circumstances change and to align with the CS period.
114. The authority is working collaboratively across the Norfolk/Suffolk area, and the relevant local authorities and agencies have recently finalised a strategy and are overseeing work on updating the GTAA (**MM 34** commits the Council to continuing this work). Given the significant progress which is being made on the GTAA and the evidence of limited demand (discussed below) the evidence base and policy approach accords with national policy.

Is the approach of not setting pitch targets justified in terms of the evidence base?

115. The preparation of the CS coincided with the knowledge that the RS figures were to be abolished – hence the Council commissioning a GTAA update with neighbouring authorities.
116. The original (2007) GTAA indicated a need for only one permanent pitch in the District. This need was subsequently met by the grant of a temporary and then permanent planning permission (2008 and 2013 respectively). The identified need for permanent pitches – as of the 2007 GTAA – has therefore been met. There was also an identified need – across Suffolk – for 5 transit sites and, although this has not yet been met, work is proceeding and policy CS14 (and the supporting text) continues the commitment to address this across the county.
117. Given the evidence from the GTAA and subsequent work, it is reasonable to assume a very low residential pitch requirement. The policy includes a commitment to provide pitches to reflect needs if these arise – which at this stage seems unlikely. The potential level of pitch provision over the plan period is well below that which would merit a land allocation at the strategic scale. Additionally, given the continuing work on transit pitches across the county, it would not be appropriate to include pitch targets at this stage, and any proposals can be assessed against policy.

Will the approach in the CS result in the adequate provision of additional pitches for travellers, or are there so many hurdles to overcome that the policy will act to prevent development?

118. Policy CS14 (which needs to be amended to reflect the approach towards travelling showpeople by **MM 34**) recognises the contribution which may be made by strategic sites (particularly close to Sudbury, where most unauthorised encampments have occurred in the past), along with other locations.
119. There are a number of hurdles, particularly in policy CS10, which any proposal for a gypsy and traveller site would need to overcome. This is particularly the case given the range of historic and landscape designations in the District. However this would be balanced by the recognition (in the same policy) of the need to address social deprivation. A balanced approach could therefore be taken and there is no reason to conclude that the policy approach would act to prevent gypsy and traveller schemes. The approach to provision is reasonable and realistic, as well as appropriate in a CS.

Conclusion

120. Overall, the CS adequately addresses the accommodation needs of the travelling community and is in accordance with national policy.

Issue 8 – Does the CS contain clear mechanisms for delivery, implementation and monitoring?

Have the infrastructure implications of the CS, to support the development proposed, been clearly identified and does it articulate what, when and by whom the infrastructure will be provided?

121. A range of policies in the CS have delivery mechanisms and information on monitoring contained within them. This is particularly the case with the strategic sites (policies CS3 and CS3a) but there is a considerable amount of similar material in other policies (for example policies CS5a, CS5b and CS6a).
122. Overarching policy CS17 deals with the delivery of infrastructure to support growth and the development of strategic sites. To ensure its effectiveness, this needs to be emphasised by a modification to the preceding text (**MM 36**) There is a detailed Appendix dealing with delivery, monitoring and review, and a recent separate Infrastructure Delivery Plan (IDP) (CD K06 and K19), produced since this issue was first raised. The IDP also deals with the responses from service providers.
123. Overall, the CS clearly articulates the need for infrastructure provision, and details who is expected to provide the various elements. There is a reasonable prospect that planned infrastructure will be deliverable in a timely fashion.

Is the approach towards developer contributions in accordance with national policy?

124. The CS deals with developer contributions at policy CS17 and section 3.6 – these relate to on-site provision and off-site contributions. There are also references in a range of other policies. Supporting the CS there is a county-wide Guide to Infrastructure Contributions (CD K14), which sets out the approach in the form of topic papers. The Guide is used by the IDP to inform the provision of some infrastructure elements.
125. The CS, supported by the IDP and the Guide, complies with national policy set out in the NPPF – most particularly the key tests therein.

Does the CS take sufficient account of the Community Infrastructure Levy?

126. The Council’s intention is to introduce a Community Infrastructure Levy (CIL) (along with Mid Suffolk District Council) shortly after adoption of the CS. The IDP (CD K06) is intended to support the CS and the CIL.
127. The main CS policy (CS17 and Appendix 3) is explicit in providing that the CIL is intended to be one of the main mechanisms for securing infrastructure – although the detail remains to be worked up as part of the CIL process. Account is therefore fully taken at the strategic level of the possible emergence of a CIL.

Will the monitoring proposed be sufficiently comprehensive to enable the delivery of policies to be measured? Are there clear circumstances under which remedial action would be triggered?

128. The monitoring of the CS will be an important element leading to its success or failure, and the approach adopted by the Council is robust. In particular policy CS18 sets out the approach to monitoring and the assessment of shortfalls and unintended impacts, and links the process to the Annual Monitoring Report as the vehicle for assessing detailed progress.

129. In addition there are various CS policies which include particular triggers for review or remedial action. These include progress on the housing trajectory (policy CS2) and to masterplan preparation (policies CS4, CS5). The results of the monitoring can then feed into other DPD documents and future reviews of the CS. Taking these matters together, I conclude that satisfactory provisions have been put in place to enable adequate monitoring of the effectiveness of the CS.

Conclusion

130. There is a comprehensive and realistically deliverable schedule of infrastructure requirements envisaged to arise as a result of the development proposals in the CS. Sufficient flexibility has been built in to reflect updated information that may emerge over the plan period or in relation to specific proposals. The approach to monitoring and remedial action is clearly set out and robust.

Issue 9a – The overall role of the major identified sites

Are the major site proposals appropriate and justified in relation to national policy, and in sustainability terms?

131. The NPPF (CD B09a) was published during the preparation of the CS, and the Council therefore had ample time to assess the emerging CS against national policy (CD L55). This led to significant modifications (CD E02) following the assessment of the new national policy and the use of the PAS Toolkit (CD E09).
132. The major site proposals are evidence based, as discussed in relation to individual sites. They are dealt with by sustainability appraisals (CD E04-E07), and are generally either major brownfield sites (Sproughton, Brantham) or growth areas related to the District’s main urban areas (Chilton Woods, Sudbury East, Hadleigh and Ipswich Fringe). They therefore have the potential to encompass the three elements of sustainable development as identified in the NPPF, and to have a satisfactory impact.
133. The basic approach of the CS, to allocate a number of major sites at this stage and to identify the necessary supporting infrastructure to enable implementation, adds a significant measure of confidence to delivery. Subject to details below, the growth proposals are appropriate and justified in relation to national policy and the need for sustainable development.

Is the development of the identified sites likely to be deliverable, bearing in mind any associated infrastructure requirements? Have the site constraints been clearly identified, along with mechanisms to overcome them?

134. The evidence shows that the major sites represent serious development proposals with willing landowners/developers. In some cases (particularly Chilton Woods and Brantham) there remain significant issues, and the approach of the Council and other parties is discussed below.
135. Some of the major sites have considerable constraints – for example those associated with the brownfield nature of the land (e.g. Sproughton and Brantham). However the approach in the CS is transparent, and the site

constraints/costs, mitigation and infrastructure requirements are as clearly set out as they could be at this stage.

136. Before submission for Examination the CS was amended to include more detail and clarification on timely delivery, particularly in the light of the policies in the NPPF. The active participation of landowners/potential developers for the major sites has given added confidence to the process. The overall conclusion is that the evidence available to date points to deliverability during the plan period.

In relation to those sites previously identified in the LP 2006, what has changed to suggest that development will now go ahead, and does recent evidence indicate that these sites should be included in the CS?

137. Given the firmly established local context, it is not surprising that some sites have been carried forward from the LP 2006. However, national policy is that reviews of land availability should include a reappraisal of the suitability of previously allocated land. Policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.
138. Four of the major sites identified in the CS (Brantham, Chilton Woods, Sproughton and Wherstead) were identified for broadly the same range of development in the LP 2006. At stages before the CS was submitted for examination the Council has referred to these sites being ‘rolled forward’ for ‘continuity’. This phraseology did not imply the rigorous reappraisal of the appropriateness of the sites which is required by national policy.
139. It was for this reason that the Hearings examined the deliverability of these sites in some detail, and why there was an exploration of the history of the sites since 2006. The Council’s approach to the deliverability of the sites was generally far more robust than some of the earlier phraseology might have suggested.
140. The detail of the sites will be dealt with below. However in the case of Brantham there have been some ownership and implementation issues – now potentially resolved – which have delayed development. Progress on the development of the Chilton Woods allocation was good until just before the Hearings opened, when an identified developer withdrew – however the authority has made significant and rapid strides in the subsequent period. Sproughton has had a continuing land ownership problem, but this was nearing resolution by the time of the Hearing. Wherstead is a slightly different case, and the recommendation (below) is that the largely undeveloped part of the allocation be removed (**MM 23 and MM 24**).
141. Overall, many of the major sites are complex, but the progress which has been made (on paper if not on the ground) gives a sufficient degree of confidence that development will now go ahead during the relevant part of the plan period.

Does the evidence base clearly identify the viability/deliverability of the major sites?

142. It is national policy that plan making for sustainable development requires careful attention to viability and costs, otherwise plans may not be

deliverable. Identified allocations must be deliverable when taking account of all additional cost requirements, along with the normal cost of development and on-site mitigation. The key question is whether there would still be acceptable returns to a willing landowner and willing developer?

143. It is accepted that the Council has to rely, to a degree, on viability evidence provided by the landowner/developer. However this evidence can be rigorously assessed by the authority, and this has clearly been done in most instances. Part of the viability evidence will be infrastructure costs and, in the case of housing development, affordable housing requirements. These have been transparently set out in the CS, and aid viability/deliverability assessment.
144. Some of the information held by landowners/developers may be commercially sensitive, and the amount which can be revealed to the authority or placed in the public domain will vary. However there should be sufficient transparency to enable a clear assessment to be made of the likely deliverability of a development. In all cases but one, this has been achieved – the other instance (the potential extension to the Brantham site) will be discussed below. With that exception, the evidence indicates the potential viability of the identified sites.

What would be the implications for the overall strategy if one or more of the identified sites were not delivered?

145. Although the strategy of the CS is not entirely ‘site led’ the importance of the major sites means that the plan should give a clear indication of the consequences of non-delivery of a major allocation. The Council accepts that non-delivery of one or more of the identified sites could be harmful (though not fatal) to the overall strategy. Given the extent to which employment and housing delivery rests on the major sites, this is perhaps self-evident, and explains the concentration given at the Hearings to their deliverability.
146. The greatest impact would be caused by the potential failure of the Chilton Woods development, as it is the largest single scheme (over 1,000 homes and 20 hectares of employment land). However in this case the broad growth allocation at Sudbury East provides a fallback position should it be needed. Although this latter allocation is less far advanced than Chilton Woods it could be brought forward in the plan period if Chilton Woods were to fail or be significantly delayed.
147. The various sites close to Ipswich are all important elements of the strategy but, given their relative proximity, have a degree of interchangeability. Thus if one employment development is delayed for whatever reason, another may come forward earlier in the plan period to compensate. The strategic allocation at Hadleigh is the only site with no obvious local fallback position. However there is no evidence of particular difficulties with this site and, although the consequences of non-delivery would impact on Hadleigh itself, the overall strategic aims of the plan would not be compromised.
148. Non-delivery of a major site would have an obvious impact on a local area but, given the linkages across the District and with adjoining areas

(especially Ipswich) the consequences would be relatively limited, and the CS is appropriately resilient. In addition the authority has the opportunity of bringing forward other sites by way of subsequent DPDs.

Conclusion

149. Overall, the role of the major identified sites is clearly set out in the CS, and the consequences for potential non-delivery can be managed. There are good prospects for sustainable delivery in relation to the new development needed to meet the CS objectives in relation to the major sites.

Issue 9b – Brantham regeneration area

The site was identified in the LP 2006 as a Special Policy Area, which was to have been the subject of a feasibility study and a development brief. These were not produced. With this background, does the current evidence base indicate that development is viable and likely to take place and thereby justify inclusion in the CS?

150. The ownership of the site was a constraint on development until the majority of the land was bought by the current owners/developers (who specialise in regeneration of redundant industrial sites) in tranches between 2006 and 2008. Following the site acquisition the anchor tenant went into receivership and there has been a considerable amount of work done by the new owners, working with the Council, assisted by the Advisory Team for Large Applications (ATLAS).
151. A position statement was published in 2008 (CD J01) and a range of background studies were produced as aids to achieving a viable development package (CDs J02 – J10). The Council’s subsequent position was that the viability issue was being addressed, and that this might involve the residential development of additional land (see next section). A viability assessment was prepared by the landowner/developer, which underwent testing by the Council and ATLAS, although the details were not made public.
152. Overall, the reasons why no development has gone ahead following the 2006 allocation are clear and do not give rise to concern about deliverability.

Does the evidence base support the proposed modification to allow for enabling housing development on the ‘Proviso D’ land between the main site and the settlement?

153. The greenfield land (known as the ‘Proviso D land’) between the original site and the village is in the same ownership as the main part of the site, and the owners have suggested that some of this land might be released for residential purposes, to cross-fund significant remediation and other site preparation costs.
154. The Council is clear that any additional housing on the Proviso D land is not needed to fulfil the housing targets of the authority, nor would it represent a windfall as defined in national policy. It would solely be a response to the regeneration needs of the main site. It should be noted that, although any additional dwellings are not necessary in that context, they would assist in maintaining a flexible supply of deliverable housing land.

155. The Feasibility Analysis prepared by the landowner/developer, which was assessed by viability experts from the Council and ATLAS, showed the maximum physically possible residential development on the landholding, but there was also a recognition that a lesser amount of development might deliver viability benefits such as to assist the overall scheme. The maximum residential development would produce 600 dwellings (including 120 affordable units) – with a split between the Proviso D land and the remainder on the western part of the main site. However it is clear that, if this maximum amount of housing were constructed, this would raise questions of proportionality in relation to the size of the existing settlement and additional infrastructure issues.
156. In the light of this the Council proposed a revision to policy CS6a and the site boundary (**MM 25 and MM 26**). This would provide that if viability evidence suggests additional residential development on some of the Proviso D land, this would be considered in relation to the benefits of the overall regeneration package. The potential inclusion of this land at a late stage in the CS process attracted considerable objection – both to the proposed modification itself and the stage at which it had come about. A further Hearing session was held to explore the position.
157. Further evidence on deliverability/viability was submitted (CD L18), and discussions took place between the landowner/developer, the Council and ATLAS. The agreed position was that no party could identify a scenario where the main employment site could be regenerated without the Proviso D land. This was based on the commercial evidence and viability scenarios examined in confidence by the Council. This apparently led to the conclusion that greenfield land was needed for cross-funding purposes. It is accepted by the Council that more detailed investigations and costing of (for example) remediation measures will be necessary. However the intention of the Proviso D modification would be to enable the need for the additional development to be explored and independently verified.
158. If the Proviso D land were to form part of a future development package, this could be subject to conditions/Planning Obligations to ensure that delivery of the housing was linked to the development of the main site – thus achieving the regeneration objective.
159. Without this modification the viability evidence base for the main site is effectively removed, as the current position is that the original site is probably undeliverable during the plan period. There would therefore be no realistic justification in delivery terms for the identification of the main site alone.
160. Overall, the inclusion of some or all of the Proviso D land rests almost exclusively on viability evidence to demonstrate that, without some residential development to subsidise it, the regeneration scheme is undeliverable. However, although a reasonable amount of material has been submitted in support of this position, evidence on constraints and costs is at a comparatively early stage and the detail of the viability assessments has not been made public. On that basis, a definite allocation of the Proviso D land for substantial housing development is not supported by the public evidence base.

161. However the proposed modification specifically allows for independent verification of future evidence to support the inclusion of the Proviso D land in any future development. This important qualification justifies the policy provision allowing for the potential development of that land in the circumstances described.

Is there a clear indication in the CS of the various constraints affecting the site, including nature conservation and landscape designations, flooding issues and the need for decontamination, can be addressed?

162. Brantham is a large contaminated site, which is partially subject to flooding issues and is affected by a range of statutory designations. These constraints have been initially assessed in a number of studies (CDs J03, J04, J05, J07 and J10). However these predated the potential inclusion of the Proviso D land. The access to the site is substandard and the assessment of the traffic impacts (CD J09) suggests that mitigation works are likely to be necessary at the Cattawade priority junction and the A137 Lawford mini-roundabout.
163. Measures to support sustainable transport and improve the railway crossing on the A137 may also be required depending on the scale of residential development. Additionally the County Council has identified the need for educational provision, again depending on the scale of residential development.
164. Drainage and sewage issues were raised by a number of local residents. However, although there are clearly problems with sewage in the local area, there is nothing to suggest that these issues would represent abnormal development costs which could impact on deliverability.
165. Overall, the work on the constraints of the main site is as well advanced as would be reasonable to expect at this stage, albeit that there is more detailed assessment and costing to come. However the implications of the potential inclusion of the Proviso D land are far from clear, especially in relation to the implications of educational and highway requirements. Again, it is the ‘conditional’ nature of the proposed inclusion of the Proviso D land which prevents the lack of knowledge of constraints from being fatal.

Given the acknowledged importance of the site, the constraints on development, and the fact that the CS provides for a review of the allocation in five years, is the plan sufficiently flexible to respond if this site is not progressed?

166. Given the importance of the site, to omit it from the CS is not an attractive option, as it is an important part of the Council’s employment land provision both in numeric and locational terms. To do nothing would not accord with the plan led approach.
167. The CS provides for regular monitoring of progress and for a specific review in five years. This is a reasonable approach given the potential difficulties of the site, and would give sufficient warning of any continuing problems, such that the allocation could be reviewed in favour of other options. In view of the obvious complexities of the site, a specific phasing programme is not appropriate and recognition that delivery would be in the latter part of the plan period and beyond is reasonable.

Conclusions

168. Prior to the inclusion of the potential enabling housing development on the Proviso D land, the justification and evidence base for the Brantham site appeared sound. Particularly given the need to see some sort of development on the site during the plan period, its inclusion was likely.
169. However doubt has been cast on the viability/deliverability of the original allocation by the position of the landowner/developers, broadly supported by the Council, which is that for development to be viable, some or all of the Proviso D land needs to be taken for enabling residential development.
170. Given this position, in the absence of the additional Proviso D land the delivery evidence for the original allocation is very weak. In addition the justification for the Proviso D land, which rests entirely on viability grounds, is at too early a stage and has too many areas of uncertainty to justify a definite allocation.
171. However the proposed modifications (**MM 25 and MM 26**) to address the potential of the Proviso D land is conditional on the submission of viability evidence to justify residential development on some of the additional land. On that basis, the extent of the evidence justifies the ‘conditional’ inclusion of the Proviso D land, and this in turn adequately justifies the allocation of the main Brantham development. It is the most appropriate option when considered against reasonable alternatives.

Issue 9c – Chilton Woods strategic land allocation

The site was identified in the LP 2006 as a Mixed Use Development, which was to have been the subject of a masterplan and a development brief. This did not happen. With this background, does the current evidence base indicate that development is viable and likely to take place and thereby justify its inclusion in the CS?

172. The development of the Chilton Woods area has been the subject of discussions with landowners and a potential developer since before the adoption of the LP 2006. However in 2011 a different developer was selected and negotiations commenced anew. A considerable amount of work (before and after 2011) was undertaken with that developer, and with the County Council (which owns 60% of the land). In particular work was well advanced on a masterplan, an EIA Scoping Report, community engagement, advice on the power supply issue, viability advice from ATLAS and a Council specialist, an access strategy, Heads of Terms for a Planning Obligation, and a range of other work.
173. The position of the parties at that stage seemed to show that it was possible to deliver a viable development on the site. The only issue which has arisen since the LP 2006 was the question of the need for additional power supply works. This electricity infrastructure provision could be a significant cost element, but the parties were committed to the exploration of alternatives with the power company.
174. At the time the CS was submitted for Examination there was a substantial evidence base to indicate that development was viable/deliverable, and that

there was a willing developer on board. Thus its place in the CS appeared to be justified.

175. However, shortly before the Hearings the agreement with the potential developer, who had a legal obligation with the main landowners to promote the allocation, ‘came to an end’. The information at the Hearing was that this was a decision by the developer alone and that it had come as a surprise to the Councils and the landowners. The District Council and the County Council explained at the Hearing the steps they intended to take to progress the matter but, due to the timing of the loss of the developer, it was not possible to take the position further at that time.
176. I allowed a period of time for the parties to rapidly progress matters. A detailed response was forthcoming in April 2013 (CD L24) covering a wide range of issues. In particular there was a commitment from both Councils and the other landowners to a Delivery Plan (CD L24 Appendix 3), a statement on Alternative Funding Approaches (CD L24 Appendix 4), and a Review of the Electricity Requirement (CD L24 Appendix 5).
177. Given the considerable disruption that the departure of the developer caused just before the Hearing, it would be unreasonable to expect that more could be done. In fact the rapidity of the work which was then undertaken gives further credibility to the stated objective of all involved to bring the development forward.
178. As part of this process, there are suggested changes to the proposed policy to build in an element of flexibility. The concern of some local representatives that there could be a watering down of the community elements of the allocation is understood. However there is nothing in the proposed modifications which lends weight to this concern. The original wording of the policy was perhaps over-prescriptive – and whilst this might have been appropriate when there was a known and willing developer on board, a greater element of flexibility is necessary under the current circumstances (**MM 17**).

Is there a clear indication in the CS of the various constraints affecting the site, including power supply and access issues?

179. There has been a substantial amount of work done in relation to constraints with the two former potential developers of the site. The extent of the constraints and infrastructure requirements – especially in the area of education provision, community infrastructure, highway provision and enhanced electricity supply – are well known.
180. There is nothing to suggest that these constraints cannot be addressed, although precisely how they would affect the viability of a particular scheme cannot be assessed at this stage. Until the departure of the developer, the evidence base appeared to demonstrate that a viable development was achievable. However this needs to be reassessed in the light of changed circumstances, although the work done to date remains a useful starting point.
181. Given the recent difficulties and the work which the Council and others are undertaking to bring the site forward, the current identification of the

constraints is all that can be reasonably expected at this stage. This should not stand in the way of the allocation of the site in the CS.

Given the importance of the site, the constraints on development, and the fact that limited progress has been made in bringing the site forward, what would be the effect on the overall approach of the CS if the site is not progressed?

182. The importance of the site in both housing and employment terms is clear, and if the site is not delivered, or if it were substantially delayed, this would have an effect on the overall delivery of housing numbers and the supply of employment land. There would also be local consequences around Sudbury, although no noticeable effect on other allocations at Hadleigh or around Ipswich.
183. However Sudbury would remain a broad area which could accommodate a substantial amount of sustainable development. The failure or delay of the Chilton Woods site could be ameliorated to a large extent by bringing forward the Sudbury East Strategic Broad Location for Growth (below) more rapidly than planned. To an extent this broad allocation has progressed more slowly than it might have done, so as to avoid harm to the housing market in Sudbury caused by the coincidence of two major developments. If Chilton Woods were stalled then this constraint would be removed.

What is the justification in the current evidence base for the extension of the LP 2006 allocation?

184. The CS allocation slightly extends the site identified in the LP 2006. The site is well located in relation to Sudbury, and is a sustainable location – as identified in the SA (CD E04 – E07). There is therefore no objection in principle to the extension of the allocation.
185. More specifically, the 2006 site did not follow field boundaries, or have any other identifiable rationale. It had only a short frontage onto the A134. The limited extension to the 2006 site largely overcomes these issues and gives a greater degree of flexibility.

Conclusions

186. Despite the recent substantial setback, the work which is being rapidly progressed gives a reasonable degree of confidence that the Chilton Woods site is deliverable, and that it should therefore remain in the CS. The proposal is appropriate and justified by the available evidence.

Issue 9d – Sudbury East/Great Cornard strategic broad location for growth

The extent of the site and detailed guidance are deferred to a future DPD. Is it reasonable that the CS omits defined site boundaries and more specific timescales?

187. Policy CS3a identifies a broad location for growth, to include employment and residential development. However the extent of the site and detailed guidance are yet to be developed, with a timetable for development taking place during the mid to late CS period. Nonetheless the policy also allows for this to be brought forward if progress at the Chilton Woods site does not progress as anticipated.

188. This identification stands out amongst the other major sites in the CS in that there is no defined site or any substantial work other than identification of landownership. However the evidence base to justify a sustainable development of this nature in the general area is sound, and the fact that the development is not proposed until the middle part of the plan period supports the outline nature of the allocation.
189. The Council’s approach to identify more detail about other major sites, in order to bring them forward more rapidly, does not invalidate the more strategic approach at Sudbury East. The approach follows national policy which requires the identification of broad locations for strategic development on a key diagram.

Is the allocation likely to be deliverable, bearing in mind any associated infrastructure requirements? Have the constraints been clearly identified, along with mechanisms to overcome them?

190. It is known from the County Council that there is unlikely to be primary school capacity in the east Sudbury/Great Cornard area, and that additional land or a new school may have to be provided as part of any development. There would also be a demand for a new Early Years facility. The key highway impacts are most likely to be found in the town centre, related to the ongoing concern about capacity limitations at the Belle Vue roundabout.
191. However there is nothing particularly unusual in the early identification of these infrastructure requirements, or any known site constraints, which would preclude the implementation of the allocation. To ensure effectiveness, a modification to the CS (**MM 16**) would emphasise the need for infrastructure to accommodate the planned levels of growth.
192. At this stage in the process, subject to close working with service providers, landowners and the local community, there is no reason to doubt the deliverability of the allocation.

Does the current evidence base support the identification of this site in its own right, or only if Chilton Woods does not progress?

193. The evidence base, particularly the Sustainability Appraisal (CD D11- D16), supports the identification of the Sudbury East broad location for growth in its own right, and not just as a fallback if the Chilton Woods site does not progress. However it is reasonable to assume that the local housing and employment markets would not support the development of two large sites in the area at the same time – and this further justifies the identification of the Sudbury East development in the middle to latter part of the CS period.
194. Given the recent difficulties encountered in progressing Chilton Woods, there is nothing in policy CS3a to prevent the allocation being brought forward – indeed this is specifically referenced in the policy.

Conclusions

195. Given the strategic nature of the broad location for growth, the policy and allocation would guide development in the general area at subsequent stages. The CS is clear about what will be delivered (subject to necessary clarification related to heritage at **MM 18**) and when it will be delivered, and

there are no identified obstacles to delivery at this stage. It is appropriate and justified by the available evidence.

Issue 9e – Sproughton strategic employment land allocation

Is the CS clear about what will be delivered, when it will be delivered, and does it provide appropriate mechanisms for delivery?

196. The site is a substantial area of largely vacant, contaminated brownfield land which requires remediation and regeneration due to its condition. In addition it is appropriate for development in terms of the SA (CD E04 – E07), and its development for employment purposes would address the comparative shortage of such land close to Ipswich. It is particularly well located to the strategic road network.
197. The site has the potential to deliver up to 1,400 jobs, and is therefore a key element of the overall economic approach of the CS. In this context the CS is clear as to the policy intention for the site and the timing of delivery – although bearing in mind the size and complexity of the site it would not be appropriate to set a detailed timetable.
198. It is clear from the history of the site and the limited amount of exploration which has been carried out to date that there will be issues of stability and contamination, but a dialogue with the site’s prospective new owners as to the identification of the issues is well in hand. At this stage, there is reasonable clarity as to mechanisms for delivery.

The site was identified in the LP 2006 as an employment site, which was to have been the subject of a development brief prepared in co-operation with a number of parties. This has not been done. With this background, does the current evidence base indicate that development is viable and likely to take place and thereby justify its inclusion in the CS?

199. The site has remained in essentially the same condition since before it was allocated in the LP 2006. There is therefore concern that the allocation may not be deliverable, as it has not been delivered over the past years.
200. However the Council, supported by the potential new owner, has explained the chequered history of the site in some detail. Essentially the purchaser of the site, after the previous employment use ceased, was intent on obtaining residential planning permission by way of an application/appeal and a subsequent High Court challenge. After these actions were unsuccessful the owner went into liquidation, and there followed a lengthy disposal process (not assisted by the involvement of Irish and Icelandic banks). All these matters explain the lack of progress on the ground since 2006, and reaffirm the appropriateness of the CS designation.
201. Through this period the site has been the subject of a number of actions by the Council and other bodies, aimed at promoting redevelopment. A range of options for external funding have been and are being explored (CD L19).
202. The issues that have stalled development, including the debt burden and the extent of potential stability/contamination issues, have led the Council to consider the potential for some higher value employment uses to assist viability. In principle, the evidence base (esp. CD C15 and D40) supports

this flexible approach. The evidence put forward for port related growth (CD L19) is based on the relative shortage of land at Felixstowe and the need for sites to accommodate a range of port related activities (CD L19 Appendix 2). The pressing need to stimulate and encourage development on the site, which would have substantial local and regional benefits, necessitates a modification to allow for the potential of higher value commercial uses, including port related activity (**MM 21**).

Is there a clear indication of the various constraints affecting the site, including biodiversity, the riverside, flooding issues and residential amenity?

203. Despite the attitude of the previous landowner, which made assessment of the site constraints difficult to assess, some information was made available by way of the unsuccessful residential planning application. However the cost of demolishing the remaining silos is uncertain at this stage.
204. Discussions with the Environment Agency have established the extent of the issues related to flooding affecting the main development site (**MM 22** clarifies the extent of the development site and the adjoining nature area).
205. Some site investigations have also been undertaken and work to progress this is underway. It is also clear that improvements would be needed to the A14 roundabout and traffic management measures would need to be undertaken in nearby settlements (**MM 21**). Given the size of the site, there is no reason to consider that there would be any difficulty in locating any potentially disruptive uses away from those residential areas which abut parts of the site.
206. Overall, given the difficulties since the site was first identified for employment development, a reasonable amount of progress has been made in assessing constraints and the approach which could be taken to overcome them.

Given the size of the site, the constraints on development, and the fact that the CS provides for a review of the allocation in five years, is the plan sufficiently flexible to respond if this site is not progressed?

207. The implications of non delivery of this site would be considerable, however the CS has significant flexibility included within it, and CS reviews or additional DPD documents could address changes and the need to stimulate growth. In addition, building on the work undertaken over some years between various authorities in the A14 corridor, the IPA board is producing joint policy documents in the area to further guide development.
208. Although not determinative of the need to include the site in the CS, the Council makes the valid point that such a large brownfield site needs to be included - as its exclusion would hamper efforts by all parties to secure beneficial redevelopment. Omitting the site, when the intention to develop is clear, would conflict with the plan led approach.

Conclusions

209. The evidence base and the need to progress the development of this important brownfield site supports its inclusion in the CS. The allocation is justified by the evidence base and would provide a major strategic

employment site and broaden the range and choice of land available. The constraints and deliverability of the site have been assessed as far as possible given its history.

Issue 9f – Hadleigh strategic site allocation

Is the CS clear about what will be delivered and when it will be delivered? Have the site constraints and advantages been clearly identified, along with mechanisms to overcome them?

210. The Hadleigh mixed use site is greenfield land on the northeast edge of the town. The allocation is defined in policy CS2 as a mixed use planned development. Policy CS4 provides that it would be developed for 5.5 hectares of employment land and 250 dwellings. Additionally account should be taken of a number of factors, including pedestrian and cycle links to the town, the enhancement of social/community facilities, and the provision of access from the A1071 (which bypasses the town).
211. In land use terms the allocation would be an extension of an adjacent LP 2006 allocation which is currently being developed. This previous allocation and subsequent planning permission was for a mix of housing and employment uses. There have been 65 house completions to February 2013 but no start on the employment development – the general economic situation and specific layout issues related to noise have been blamed for this slow start. Marketing details show a significant effort to progress the original employment site.
212. Despite the slow start to one element of the adjoining development, there are no identified obstacles to delivery of the current allocation, which is programmed for the early part of the CS period. The IDP (CD K06) gives a broad brush indication of costs, along with the County Council’s S106 Guide (CD K14). Meetings with local stakeholders, the landowner’s agent, and the developer of the adjoining site have not revealed issues which would affect viability. In addition the roundabout and spine road through the approved development has already been provided, thereby reducing off-site costs related to the new allocation.
213. An important degree of flexibility as to the scale of the two uses within the allocation would be provided by a modification (**MM 19**), which would aid delivery. The additional guidance as to the considerations affecting the form of the development is welcomed.
214. The site is on the fringe of the town. However the provision of a dedicated pedestrian and cycle access direct into the town centre (rather than by way of the A1071) and the provision of a Travel Plan (**MM 19**) would accord with national policy to minimise the use of the private car. The allocation would then relate reasonably in accessibility terms to the town centre.
215. The County Council, as the education authority, has confirmed that the development would not be large enough to require pre-school or primary provision in its own right, but that it would be close to the threshold for the former. In the light of this position, **MM 19** includes necessary clarifications as to the type of community facilities which might be required as part of the development.

Conclusion

216. Subject to the above modifications, I therefore conclude that the CS’s proposals for the Hadleigh mixed use site are appropriate and justified by the available evidence.

Issue 9g – Ipswich Fringe strategic site allocation

Is the CS clear about what will be delivered, when it will be delivered, and are there appropriate mechanisms for delivery?

217. The urban edge of Ipswich extends into that part of Babergh District which lies east of the A14. This part of Babergh is heavily influenced by Ipswich for employment, leisure and shopping trips. The Ipswich Fringe site, defined as a locally strategic site by policy CS2, is partly greenfield and partly occupied by a hotel, employment uses and dwellings. It is bounded by the A14 to the west, the A1071 to the north, and the A1214 to the east – beyond which are a number of new developments (a superstore and other retail developments and the ‘Suffolk One’ college).
218. The site has the potential to accommodate a significant mixed development of around 350 dwellings and 6 hectares of employment land. It is reasonably described as a gateway site leading into Ipswich. The policy provides for the production of a masterplan leading to development in the early to middle part of the CS period.
219. The identification of the site arose from the Broad Locations stage of the CS in 2010, and was considered in the SA Broad Locations report (CD D15a) and the SA Final Report (CD E07). The site is well contained by and accessible from the road network and is available – as noted in the SHLAA Update 2012 (CD D17). The IDP (CD K06) gives a broad brush indication of costs, along with the implications of the County Council’s S106 Guide (CD K14).
220. Although at an early stage, there is clear evidence of a named developer seriously pursuing a scheme, in full knowledge of the constraints, and a draft Masterplan has been produced (February 2013) following site investigations, highways assessment, and archaeological and biodiversity studies. This shows the overall site being developed in a number of separate parcels, with existing uses remaining undisturbed.
221. The Copdock junction is a major interchange close to the allocation. It is a long term ambition of the County Council’s Local Transport Plan (CD C06) to deliver a major improvement to this interchange. It would be clearly unreasonable to expect the Ipswich Fringe site to wholly fund these improvements but, in view of the likely traffic generation arising from the development, it would be reasonable to expect an appropriate contribution. Policy CS5 recognises that off-site highway improvements may be required as a result of the development.
222. There have been discussions with the County Council, as the education authority, related to the size of the potential development and the consequent need for primary school provision - based on the S106 Guide to Developer Contributions (CD K14). There was initial consideration of using existing schools in Ipswich, but the need to either cross dangerous roads or

bus a significant number of children into the town renders this option undesirable. It has now been agreed that a new school should be provided as part of the development (**MM 20**).

223. The potential growth plans of the existing commercial occupiers of parts of the site should be accommodated. This leads to the need to incorporate a degree of flexibility into the policy and Note 1 to the revised policy explains the requirement to respect existing employment uses and encourage their expansion within the framework of a masterplan (**MM 20**).
224. Subject to these modifications, there is therefore no reason to doubt the deliverability of the allocation.

Should the site be considered as part of a wider strategy for this part of the urban edge of Ipswich?

225. Concern has been expressed by Ipswich Borough Council (CD L22/L23) about the ability of a development on this site to integrate with the wider urban area of Ipswich. This authority has suggested the need for a comprehensive masterplan for a much wider area before development takes place.
226. Although the production of a masterplan covering a wider area has much to commend it, it is not clear why development of the Ipswich Fringe site should be delayed to allow this to take place. Moreover there is a good argument that such a masterplan would have been more appropriate before the development of the Suffolk One scheme, lying between the Ipswich Fringe site and the majority of the urban area. The Suffolk One development has, to a significant extent, linked the Ipswich Fringe site and the main urban area, and increased the suitability of the site for further urban development.
227. Although it is reasonable to consider this site as part of the wider development of this part of Ipswich, this would include areas of remaining land which have a wider range of constraints and more complex delivery issues. There is no reason to delay the development of the Ipswich Fringe site whilst the deliverability of this wider area is considered. In any event, a more substantial development beyond the allocated site would be in excess of the Council’s requirements for the current plan period and there is no policy support for pursuing it at this time.

Conclusion

228. Subject to the above modification, I therefore conclude that the CS proposals for Ipswich Fringe are appropriate and justified by the available evidence.

Issue 9h – Wherstead Park strategic employment land allocation

Given the identification of the site in the LP 2006, does the evidence base justify inclusion of the eastern part of the site in the CS?

229. The Wherstead Park site, defined as a locally strategic site by policy CS2 falls into two distinct sections. The existing Office Park is an employment site of around 7.1 hectares, mainly occupied by the Co-op.

230. The land was allocated for similar purposes in the 2006 LP, at a time when the future of the site was uncertain. There is nothing to suggest that the eastern part of the site will become vacant during the plan period, although there may be some potential for additional development in parts of the area.
231. This part of the site makes and should continue to make an important contribution to the local economy. The purpose of policy CS5b is partly to safeguard the existing contribution made by the site, and partly to emphasise that the location is not suitable in sustainability terms for non-employment development.
232. Although there is therefore no immediate intention to expand or consolidate employment uses on this part of the site, its importance and the need to support and encourage job opportunities make it appropriate for inclusion in the CS. It would reaffirm the importance of the site as a strategic employment location and support its identification as a potentially growing business park. The policy sets out a number of reasonable criteria to guide consideration of any proposals, and also makes it clear that any significant reduction in employment floorspace/occupation levels would prompt a wider review of sites in the A14 corridor.

Does the evidence base support the allocation of the western part of the 2006 allocated site?

233. Turning to the western part (3.3 hectares) of the site, the situation is very different. The Council estimates that it could accommodate 480 jobs, although given the presence of various constraints, it is hard to assess whether this figure could actually be accommodated on the site. This area is largely greenfield land, and is constrained by poor access (as is the main site) and the presence of Listed Buildings. It is apparently in separate ownership to the main part of the allocation.
234. No information has come forward from the landowner(s) or any other party to suggest that the site would be deliverable or viable. The Council accepts that the evidence base is sparse and that there is a lack of intent to progress development.
235. There is no suggestion of this area of land coming forward during the CS period, and this is made explicit in policy CS5b itself – the intention of the policy was that the allocation be reviewed in subsequent DPD documents. Part of the rationale for the allocation was that it might secure an improved access to the main part of the site – but there is no mechanism by which this might be accomplished, even if a development were to come forward. There is insufficient justification for the identification of this greenfield land.
236. This is accepted by the Council and the removal of the western part of the site is proposed by modifications (**MM 23 and 24**).

Conclusion

237. Subject to the above modifications, I therefore conclude that the allocation of Wherstead Park is appropriate and justified by the available evidence.

Assessment of Legal Compliance

238. My examination of the compliance of the CS with the legal requirements is summarised in the table below. I conclude that the CS meets all the requirements.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The CS is identified within the approved LDS November 2007 (CD E11a), updated in September 2012 (CD E11b). This sets out an expected adoption date of June 2013. The CS’s content and timing, taking account of consultation on main modifications, are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in December 2006 (CD E08) and consultation has been compliant with the requirements therein, including the consultation on the modifications before submission and post-submission proposed main modification changes.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations Assessment (CD E04) has been carried out and updated in June 2012 (CD E07) and is adequate.
National Policy	The CS complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The CS complies with the Act and the Regulations.

Overall Conclusion and Recommendation

239. The submitted CS has a number of deficiencies in relation to soundness for the reasons set out above, which means that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. Those deficiencies have been explored in the main issues set out above.

240. The Council has requested that I recommend Main Modifications to make the CS sound and capable of adoption. I conclude that with the recommended Main Modifications set out in the Appendix the Babergh Local Plan 2011-2031 Part 1 – Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in NPPF.

P. J. G. Ware

Inspector

This report is accompanied by the Appendix containing the Main Modifications

Appendix – Main Modifications

The modifications are shown as either **bold underline to denote new text** or **~~bold strikethrough~~** for deleted text.

(The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.)

Mod no.	Page no.	Policy / Para or Map ref	Post Submission Modification
1	i	Exec Summary Section 1	<p>Delete text in final paragraph of section 1 in Executive summary:</p> <p>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).</p>
2	ii	Exec Summary Section 4	<p>Delete text in first paragraph on page iii, section 4 of the Exec Summary:</p> <p>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.</p>
3	2	1.3	<p>Delete paragraph 1.3</p> <p>1.3 Summary of Position on the Regional Spatial Strategy (RSS) (The East of England Plan, adopted 2008)</p>

Mod no.	Page no.	Policy / Para or Map ref	Post Submission Modification
			<p>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.</p> <p>Please note that further information on this matter will be included in the supporting technical background document dealing with ‘Conformity’.</p>
4	19	2.1.4	<p>At the end of the 2nd paragraph delete the full stop and add:</p> <p>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 <u>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</u></p>

Mod no.	Page no.	Policy / Para or Map ref	Post Submission Modification
			<p><u>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.</u></p>
5	19	2.1.4	<p>Brantham as a Hinterland Village. Add an (amended) additional sentence at the end of the 2nd paragraph under 2.1.4, to immediately follow on from the text suggested above:</p> <p><u>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 or 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.</u></p>
6	20	Map 4	<p>Re Map 4 (<i>was previously Map 5</i>) – add a note on the map read:</p> <p><u>Note: This map shows Functional Clusters of villages in Babergh i.e. the Core Villages with their hinterlands. Some Hinterland and rural villages and hamlets appear in more than one Functional Cluster as this map reflects information gathered in 2010 through workshops, surveys and the input of community representatives from these settlements. Whilst all the Hinterland Villages are shown in these Clusters not all the smaller villages / rural hamlets are included.</u></p>
7	21	2.1.5	<p>To add clarity suggest additional wording in this paragraph as follows:</p> <p>2.1.5 Countryside</p> <p>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 <u>the smaller rural villages</u>, some small clusters of houses located remotely from village centres</p>

Mod no.	Page no.	Policy / Para or Map ref	Post Submission Modification
			<p>and a few very small rural hamlets. <u>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.</u></p> <p>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.</p>
8	22	2.2.1	<p>Delete text in the 2nd paragraph as follows:</p> <p>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.</p>
9	24	1 st para’, Section 2.3	<p>Amend text in first paragraph of section 2.3 as follows:</p> <p>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 <u>Babergh has been</u> working together with <u>neighbours neighbouring</u> -- in this area the Suffolk Haven Gateway <u>∕ Ipswich Policy Area</u> authorities – to provide a <u>realistic</u> “bottom up” estimate <u>of indicative jobs target figures</u> based on need / capacity and the local economic context. Accordingly, and whilst the Government has indicated that RSSs will be revoked, it . <u>It</u> is important to note that the</p>

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			<p>proposed indicative jobs growth target figure of the emerging RSS (9,700 for Babergh with includes an apportionment allowance for <u>new jobs on land within Babergh to be included within a jobs growth target for</u> 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.</p> <p><i>For ease of reference this paragraph will read as follows;</i></p> <p><i>Babergh has been working together with neighbouring 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. It is important to note that the proposed jobs growth target figure includes an allowance for new jobs on land within Babergh to be included within a jobs growth target for the Ipswich Policy Area.</i></p>
10	24	2 nd para, Section 2.3	<p>Delete text in the 2nd paragraph of Section 2.3 and add additional text as follows:</p> <p>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. <u>One approach was based on the forecast figure of 8,100 new jobs forecast in the former Regional Strategy (RS) (abolished January 2013) applied the where</u> the same percentage growth in new houses used in the <u>former RS</u>, 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.</p> <p><i>For ease of reference this paragraph will read as follows;</i></p> <p><i>Assessing a realistic jobs growth target has also been considered from other approaches. One approach was based on the figure of 8,100 new jobs forecast in the former Regional</i></p>

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			<i>Strategy (RS) (abolished January 2013) where the percentage growth in new houses used in the former RS, i.e. 20% was applied to the jobs target for the district to 2031. This gave a figure of 9,720 new jobs.</i>
11	29	2.6.3	<p>Delete reference to RSS in penultimate sentence of para 2.6.3</p> <p>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 RSS’s. This continues less formally under current planning system arrangements but a strategic planning role covering various different geographies remains in place nevertheless.</p>
12	30	2.6.4	<p>Delete 2nd sentence and beginning of 3rd sentence in penultimate paragraph as follows:</p> <p>A good indicator of success was the achievement of New Growth Point status for the sub-region, leveraging 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.</p>
13	30	2.7	<p>Add additional wording to para 2.7 to provide further clarity regarding the role of BUABs in the future (see also proposed modification to paragraph 2.8.4 below):</p>

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			<p>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.</p> <p><u>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</u></p>
14	31	Policy CS1	<p>Amend Policy CS1 as follows:</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy CS1: Settlement Pattern Policy</p> <p>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, <u>the capacity of existing physical and social infrastructure to meet forecast demands and the provision of new / enhanced infrastructure</u>, 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.</p> <p>Towns / Urban areas:</p> <ul style="list-style-type: none"> ▪ Sudbury and Great Cornard ▪ Hadleigh ▪ Babergh Ipswich Fringe (edge of urban area) <p>Core Villages serving Functional Clusters</p> <p>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</p> </div>

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			<p>sites will also be pursued for these villages according to identified local needs.</p> <p>The Core Villages identified on the Key Diagram are:</p> <ul style="list-style-type: none"> • Bildeston • Boxford • Bures St Mary • Capel St Mary • East Bergholt • Glemsford • Holbrook • Lavenham • Long Melford • Nayland <p>Hinterland Villages</p> <p><u>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.</u></p> <ul style="list-style-type: none"> • Acton • Aldham • Assington • Belstead • Bentley • Brantham • Brent Eleigh • Brettenham • Burstall • Chelmondiston • Chelsworth • Cockfield • Copdock & 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 • Tattingstone • Wattisham • Whatfield • Woolverstone <p>Countryside</p> <p>In the countryside, outside the towns / urban areas, Core and Hinterland Villages defined above, development will</p>

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			<p>only be permitted in exceptional circumstances subject to a proven justifiable need.</p>
15	34	Policy CS2	<p>Amend Policy CS2: as follows to reflect the discussions, issues raised and questions asked by the Inspector through the examination process:</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy CS2: Strategy for Growth and Development</p> <p>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.</p> <p>The Local Economy</p> <p>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:</p> <ul style="list-style-type: none"> • 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. </div>

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			<p>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.</p> <p>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.</p> <p>Proposals for uses in new and emerging employment sectors, particularly those that:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>Number and Distribution of New Homes</p> <p>Babergh District Council will make provision for 5,975 new dwellings between 2011 and 2031 in the District. These dwellings are planned as follows: 1,100 between 2011-2016; and 4,875 between 2017-2031. The housing target will be achieved by:</p> <ul style="list-style-type: none"> • Existing commitments as identified in the trajectory;

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			<ul style="list-style-type: none"> • Allowing for a windfall figure of 1,640 dwellings; • Making provision for 2,500 new dwellings to be built in the following locations: <p><u>Proposed new land allocation numbers in this Core Strategy:</u></p> <table border="1" data-bbox="580 551 1453 846"> <thead> <tr> <th>Location</th> <th>No of Dwellings</th> </tr> </thead> <tbody> <tr> <td>Sudbury and Great Cornard</td> <td>850 (Note 1)</td> </tr> <tr> <td>Hadleigh</td> <td>250 (Note 2)</td> </tr> <tr> <td>Ipswich Fringe</td> <td>350 (Note 3)</td> </tr> <tr> <td>Core & Hinterland Villages</td> <td>1,050 (Note 4)</td> </tr> <tr> <td>Total</td> <td>2,500</td> </tr> </tbody> </table> <p>Implementation and delivery:</p> <p>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.</p> <p><u>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)</u></p> <p><u>Note 2: This figure is the dwellings allocated at the strategic allocation at Hadleigh (see Policy CS4)</u></p> <p><u>Note 3: This figure is the dwellings allocated at the strategic allocation at the Ipswich Fringe (see Policy CS5)</u></p> <p><u>Note 4: This figure is the allowance made for rural growth (see Policy CS1)</u></p>	Location	No of Dwellings	Sudbury and Great Cornard	850 (Note 1)	Hadleigh	250 (Note 2)	Ipswich Fringe	350 (Note 3)	Core & Hinterland Villages	1,050 (Note 4)	Total	2,500
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Total	2,500														
16	35	2.8.1	<p>Amend the penultimate paragraph in 2.8.1 as follows to include reference to the capacity of infrastructure;</p> <p>Boundaries and detailed policies / guidance on the identified Broad Location for future growth to the east of the town will be</p>												

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			<p>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.</p>
17	36 - 39	Policy CS3	<p>Make the following amendment to Policy CS3 in response to matters raised at the examination hearing:</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy CS3: Chilton Woods Strategic Land Allocation and Strategy for Sudbury / Great Cornard</p> <p>A. Chilton Woods Strategic Land Allocation</p> <p>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 <u>(to include as a minimum the items listed i to vii below)</u>. This allocation is expected to provide an integrated, high-quality and sustainable development that fulfils the requirements of other policies in this Core Strategy, 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.</p> <p><u>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.</u></p> <p>The development will provide and include, and the masterplan will show:</p> <p>a. <u>Approximately 15</u> 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</p> </div>

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			<p>access via Woodhall Business Park as part of a comprehensive and agreed access strategy and phasing plan;</p> <p>b. <u>Approximately 5</u> hectares of land to the north of Waldingfield Road are allocated for employment related use(s) (towards the scheme’s eastern end) <u>subject to the new development having</u> a low impact <u>only</u> in terms of traffic generation and on <u>nearby</u> residential amenity. Some of this allocated development has already been implemented and is in situ. Access to this development will be via the existing access to Chilton Airfield on Waldingfield Road;</p> <p>c. <u>Provision for a waste facility, to include household waste and recycling centre;</u></p> <p>d. Provision for <u>approximately</u> 1,050 new homes (on an area of <u>approximately 33</u> 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;</p> <p>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);</p> <p>f. Structural landscaping / community woodland <u>Provision of community woodland and structural landscaping (approximately 30</u> hectares) <u>located throughout the site and</u> along the boundaries of the site. This must be designed to take account of existing features such as trees, hedgerows and watercourses, <u>and to coordinate with the spatial requirements, design and context for the items referred to in points g and h below.</u> The scheme must provide for long-term, comprehensive financial and management / maintenance plans and arrangements for <u>such community woodland</u> and for the local community <u>and Chilton Parish Council, Sudbury Town Council, Long Melford and Acton Parish Council</u> to be involved in its <u>design</u>, establishment and management;</p> <p>g. Surface water attenuation will be required to minimise the risk of flooding (the preferred means being SUDS);</p> <ul style="list-style-type: none"> • A transport assessment based upon the development proposals will be required and a travel plan will be necessary; • Provision of an appropriate new neighbourhood centre for the development

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			<p>with local retail provision and community facilities (minum 1.6ha);</p> <p>h. Provision of landscaping, green infrastructure <u>(which may incorporate ‘blue’ infrastructure such as balancing ponds/wetland created as part of the SUDS)</u> and open space / leisure & recreational facilities (minimum 8.2 <u>approximately 8</u> ha); and <u>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</u> be planned to coordinate with the wider network for Sudbury and Great Cornard area;</p> <p>i. A transport assessment based upon the development proposals will be required and a travel plan may <u>will</u> be necessary;</p> <ul style="list-style-type: none"> • 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). <p>j. <u>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:</u></p> <ul style="list-style-type: none"> <u>• 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;</u> <u>• local retail provision, a pub and/or café, and leisure uses, business space and a residential element including opportunities for live / work units; and</u> <u>• a civic square / area for market stalls/community meeting area.</u> <p>k. Provision for approximately <u>imately</u> 3 ha. of land for education (primary school / nursery provision) and associated uses;</p> <p>l. An evidence-based package of sustainable transport measures to include <u>the creation of new routes</u></p>

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			<p>and/or the enhancement of existing links for pedestrians and cyclists to the town centre, rail station, employment areas, schools, bus stops, etc.;</p> <p>m. Any requirement for off-site transport / highway improvements will be determined by transport assessment evidence;</p> <p>n. <u>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.</u></p> <p><u>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 94.5 ha. of the total 131 ha. 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.</u></p> <p><u>The masterplan and supporting studies and feasibility/viability evidence should demonstrate and include:</u></p> <ul style="list-style-type: none"> i. <u>how the overall development, including its access points, positively responds to, and where possible enhances, designated heritage assets and their settings;</u> ii. <u>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;</u> iii. <u>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;</u> iv. <u>outcomes from community engagement and mechanisms to establish delivery and ongoing management of community resources;</u>

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			<p><u>v. phasing of the scheme, including provision of development, social and physical infrastructure and services;</u></p> <p><u>vi. a biodiversity plan including any measures for protection, mitigation, compensation and/or new habitat creation; and</u></p> <p><u>vii. the density and mix of housing types (including affordable housing provision) in line with Policies CS14 and CS15.</u></p> <p><u>Implementation and Delivery</u></p> <p>The Council is committed to working co-operatively with partners <u>and Chilton Parish Council, Sudbury Town Council, Long Melford and Acton Parish Council and the local community</u> to bring forward and deliver the Chilton Woods scheme in a timely way. This will include joint action to overcome potential key development issues, <u>such as the</u> 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, <u>the community woodland</u>, necessary community facilities and <u>structural</u> landscaping / woodland screening at the appropriate point in the overall development process.</p> <p>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:</p> <ul style="list-style-type: none"> 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. <p><u>B. Other Development for Sudbury / Great Cornard</u></p> <p>A Neighbourhood Plan and/or other DPD(s) will be prepared</p>

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			<p>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.</p> <p>Development in Sudbury / Great Cornard should comply with other policies the Core Strategy, in this Local Plan particularly Policy CS10, and other subsequent documents, and where appropriate, provide:</p> <ul style="list-style-type: none"> • 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. <p>C. <u>Sudbury Town Centre</u></p> <p>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.</p>
18	39 - 40	Policy CS3a	<p>Amend Policy CS3a as follows:</p> <div style="border: 1px solid black; padding: 5px;"> <p>Policy CS3a Strategic Broad Location For Growth - East of Sudbury / Great Cornard</p> <p>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.</p> </div>

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			<p>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:</p> <ul style="list-style-type: none"> (a) Ensure that high quality design and the layout respect the adjacent landscape, <u>heritage assets</u>, 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. <p>Implementation and Delivery</p> <p>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;</p> <ul style="list-style-type: none"> 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.

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19	41 - 43	Policy CS4	<p>Amend Policy CS4 as follows:</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy CS4: Strategy for Hadleigh</p> <p>A. Hadleigh Strategic Site Allocation</p> <p>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:</p> <ul style="list-style-type: none"> • <u>Approximately</u> 5.5 hectares of employment land; • <u>Approximately</u> 250 dwellings; • <u>how the development will be designed to suit the landform / topography and landscape characteristics of the site and its local context;</u> • 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; • <u>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;</u> • <u>the range, density and mix of housing types and the level of affordable housing provision in line with Policies CS14 and CS15;</u> • <u>phasing of the development including social and physical infrastructure and services, and where appropriate, including any development or provision proposed beyond the plan period;</u> • 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, <u>and proposals for green and blue infrastructure to assimilate new development into the landscape and create new habitats.</u> 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); • <u>a biodiversity plan including any measures for protection, mitigation, compensation and / or new habitat creation;</u> • <u>a drainage strategy, with provision for a sustainable urban drainage system;</u> • good links and/or the enhancement of existing links and facilities (such as bus stops) for pedestrians and cyclists to the town </div>

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			<p>centre and other local shops and services, employment areas, schools, etc.;</p> <ul style="list-style-type: none"> • <u>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;</u> • 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 <u>on to Frog Hall Lane only for pedestrians, cyclists and emergency vehicles. if necessary.</u> Off-site transport improvements may also be necessary; <u>In addition a travel plan will be required;</u> <p>Implementation and Delivery</p> <p>No critical obstacles have been identified for the 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.</p> <p>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:</p> <ul style="list-style-type: none"> • 2012-14 – preparation and consultation on a masterplan for the area shown on Map B 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. <p>B. Strategy for Hadleigh</p> <p>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. <u>Development</u></p>

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			<p><u>for town centre uses and refurbishments that enhance the retail quality, choice and vitality / viability of Hadleigh town centre will be encouraged.</u></p> <p><u>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.</u></p>
20	44	Policy CS5	<p>Amend Policy CS5 as follows:</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy CS5: Strategic Site Allocation: Babergh Ipswich Fringe</p> <p>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:</p> <ul style="list-style-type: none"> • <u>Approximately</u> 6 hectares of land to create a quality ‘gateway’ business / employment area <u>in addition to the ‘existing employment uses within the allocated area; and</u> • a new community of <u>approximately</u> 350 homes; <p>A masterplan will be required which should:</p> <ul style="list-style-type: none"> • 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 <p>The masterplan and supporting studies and feasibility / viability evidence should demonstrate and include:</p> <ul style="list-style-type: none"> • 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 </div>

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			<p>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;</p> <ul style="list-style-type: none"> • <u>primary school and</u> 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; <p>Implementation and Delivery</p> <p>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.</p> <p>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:</p> <ol style="list-style-type: none"> i. 2012 - 14 – preparation and consultation on a masterplan for the area shown on Map C 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. <p><u>Note 1: 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</u></p>

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			<p><u>employment uses emerging through the masterplanning and planning application processes.</u></p> <p><u>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.</u></p>
21	47	Policy CS5a	<p>Amend Policy CS5a Sproughton Strategic Land Allocation as follows:</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy CS5a: Sproughton Strategic Employment Land Allocation</p> <p>The former ‘British Sugar’ (sugar beet factory) site, Sproughton (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.</p> <p><u>Development should comply with other policies in this Core Strategy particularly Policy CS10, and other subsequent documents.</u> Applications will be assessed with regard to:</p> <ul style="list-style-type: none"> • 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, <u>with regard to provision / upgrading of sustainable transport access between the site, nearby villages and Ipswich town centre as necessary;</u> • the provision of any necessary measures to address transport impacts off-site, <u>including speed management, remodelled roundabout(s) providing access to the A14 and mitigation of additional development-related traffic generated through Sproughton village;</u> • production of a Flood Risk Assessment; and • feasibility / viability evidence <p>Implementation and Delivery</p> </div>

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			<p>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).</p> <p>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.</p> <p>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).</p> <p>Note 1: <u>Current evidence indicates that this is not anticipated to take the form of a ‘Dryport’ (intermodal freight transport) solution.</u></p>
22	XX	Map D	<p>Amend Map D Sproughton Strategic Employment Site Allocation to show Main Site and Island Site</p>
23	48	Policy CS5b	<p>Amend Policy CS5b Wherstead Park Strategic Employment Land Allocation as follows:</p> <div data-bbox="544 1850 1493 2056" style="border: 1px solid black; padding: 5px;"> <p>Policy CS5b Wherstead Park Strategic Employment Land Allocation</p> <p>The existing Wherstead Office Park (7.1 hectares), Wherstead is allocated for retention in employment uses as</p> </div>

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			<p>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.</p> <p>Development should comply with other policies in this Local Plan particularly Policy CS10, and other subsequent documents. Applications will be assessed with regard to:</p> <ul style="list-style-type: none"> • 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; <p>Implementation and Delivery</p> <p>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).</p> <p>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.</p>
24	XX	Map E	<p>Amend Map E Wherstead Strategic Employment Site Allocation</p>

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25	49 - 52	2.8.5 & Policy CS6a	<p>Amend the supporting text preceding Policy CS6a and the policy itself as follows:</p> <p>2.8.5 Brantham Redevelopment / Regeneration Area</p> <p>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.</p> <p>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.</p> <p>The site is partly crossed and partly abutted by the main London Liverpool Street to Norwich rail route, and has estuarial frontages. The industrial site is separated from the main village by Greenfield land within the same ownership <u>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.</u></p> <p>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</p>

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			<p>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.</p> <p>Brantham village underwent significant growth in the 1960s and 70s, at the time related to the industrial operation. The site is now ripe for a major regeneration scheme, in accordance with the principles laid down in the adopted Local Plan policy EM06 and the Council’s Planning Position Statement of 2008. It will be expected that green infrastructure will be central to the character and layout of such a scheme in accordance with Policy CS10 (particularly with regard to providing mitigation within the proposed development for potential recreational impacts on the SPA and Ramsar site), and that it will deliver new employment buildings, new dwellings and improved community facilities proportionate to the amount of development permitted, all in accordance with an agreed Master Plan. A high quality development will be sought, particularly in the event that riverside development is sought.</p> <p>The masterplan and mitigation strategy will need to ensure that direct and indirect negative impacts on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site are avoided. In particular, provision of alternative Natural Green Space will be required, in line with the Haven Gateway Green Infrastructure Strategy. Provision and funding for the green infrastructure will be provided by the developer(s). It is anticipated that the green infrastructure provision would include creation of a new Public Open Space, for which the design and management plan should aim for a quality suitable for designation as a Local Nature Reserve.</p> <p>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.</p> <div data-bbox="534 1760 1485 2042" style="border: 1px solid black; padding: 5px;"> <p>Policy CS6a Brantham Regeneration Area Allocation</p> <p>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.</p> </div>

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			<p>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.</p> <p>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</p> <p>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</p> <p>C. The scale location and form of residential development should be determined with regard to:</p> <ul style="list-style-type: none"> • 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 <u>and local facilities / services that have capacity to accommodate growth or new facilities / services</u> are maximised; addressing the meeting of identified housing needs <p><u>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.</u></p> <p>Applications will be assessed with regard to:</p> <ul style="list-style-type: none"> • 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;

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			<ul style="list-style-type: none"> • 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 <p>Implementation and Delivery</p> <p>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.</p> <p>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.</p> <p>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).</p>
26	XX	Map F	<p>Amend Map F Brantham Regeneration Area Allocation to show</p> <p>.....</p>
27	53 - 54	2.8.4	<p>For issues of clarity and confirmation, add additional guidance by amending para 2.8.4 as follows:</p> <p>At the end of the first paragraph following the bullet point list;</p> <p>Core Villages will accommodate a proportion of new development, and as each village is different in size, character,</p>

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			<p>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 <u>including:</u></p> <ul style="list-style-type: none"> • <u>Locally identified need - housing and employment</u> • <u>Specific local need such as affordable housing;</u> • <u>Flood Risk;</u> • <u>Nature conservation constraints / designated areas and implications of an Appropriate Assessment under the Habitats Directive (where appropriate);</u> • <u>Landscape considerations and designated sites (particularly the ANOBs);</u> • <u>Historic character and heritage assets;</u> • <u>Infrastructure constraints - physical infrastructure / utilities;</u> • <u>Infrastructure needs (e.g. transport, open space, leisure facilities) and access to services and facilities; and</u> • <u>Availability of brownfield land.</u> <p>In the final paragraph on page 53 (starting “It is clear that) add two new sentences after the first sentence as follows:</p> <p>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. <u>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.</u> 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”</p>

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			<p>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.</p> <p>Add an additional sentence at the end of the final para’ under 2.8.4 preceding Policy CS6 as follows;</p> <p>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. <u>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.</u></p>
28	54	2.8.4	<p>Add a new sentence after the final paragraph under paragraph 2.8.4 preceding Policy CS6 as follows:</p> <p><u>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</u></p>

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			<p><u>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.</u></p>
29	54	Policy CS6	<p>Amend Policy CS6 as follows:</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy CS6: Strategy for Development for Core and Hinterland Villages</p> <p>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:</p> <ul style="list-style-type: none"> • <u>the landscape, environmental and heritage characteristics of the village;</u> • <u>the locational context of the village and the proposed development (particularly the AONBs, Conservation Areas, and heritage assets);</u> • 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 <u>in respect of social, physical and environmental impacts.</u> <p>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:</p> <ul style="list-style-type: none"> • 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 </div>

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			<p>identified schemes in adopted community / village local plans within the same functional cluster.</p> <p>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.</p> <p>All proposals for development in Hinterland Villages must demonstrate how they meet the criteria list above.</p> <p>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.</p> <p>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.</p>
30	60	Para 3.3.1	<p>Delete “and regional” in the paragraph headed Policy context under 3.3.1 as follows;</p> <p>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.</p>
31	68	Policy CS7	<p>Amend Policy CS7 and the supporting text preceding the policy (final paragraph at end of 3.3.7) to update and add clarity as follows;</p> <p>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</p>

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			<p>DPD. There is an expectation that minimum standards will <u>progressively improve</u> be improved on over time such that non-residential developments should aim to increase design standards to achieve BREEAM Excellent in 2013 rising to BREEAM “Outstanding” <u>standard or equivalent</u> in 2016.</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy CS7: Sustainable Design and Construction Standards:</p> <p>Larger scale residential developments, particularly those within the New Directions of Growth <u>Strategic Allocations and Broad Location for growth</u>, will be expected to achieve the Building For Life Silver Standard. <u>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.</u></p> <p>All new non-residential developments will be expected to achieve, as a minimum, the BREEAM “Very Good” <u>Excellent</u> standard or equivalent.</p> <p>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).</p> <p>Note 2: The local planning authority will determine which residential developments are considered to be “larger scale” <u>(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).</u></p> <p>Note 3: This policy should be read in conjunction with Policy CS10 (including Note 3),</p> </div>
32	70	Policy CS8	<p>Amend Policy CS8 to update wording and to add clarity as follows;</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy CS8: Renewable / Low Carbon Energy</p> <p>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.</p> </div>

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			<p>Development within the <u>Strategic Allocations and Broad Location for growth</u> New Directions of 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.</p> <p>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.</p> <p>Opportunities for incorporating renewable/low carbon energy provision into new development, and/or producing renewable/low carbon energy may be identified in the Site Allocations DPD.</p> <p>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.</p> <p>Note 1: Development such as wind turbines <u>Renewable energy proposals, including but not limited to wind turbines</u> 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. <u>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.</u></p> <p>Note 2: The Development Management and Site Allocations <u>Future</u> 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. <u>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</u></p>

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			<p><u>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 within Part L.</u></p> <p>Note 3: The local planning authority will determine which development proposals are considered to be “large-scale” <u>(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).</u></p>
33	77	Policy CS10	<p>Make the following amendments to Policy CS10:</p> <div style="border: 1px solid black; padding: 10px;"> <p>Policy CS10: Implementing Sustainable Development in Babergh</p> <p>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:</p> <ul style="list-style-type: none"> • 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 </div>

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			<p>the wider needs of an aging population and also those of smaller rural communities;</p> <ul style="list-style-type: none"> • protect and enhance biodiversity, prioritise the use of brownfield land for development <u>ensuring any risk of contamination is identified and adequately managed</u>, 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);

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			<ul style="list-style-type: none"> • 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. <p>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.</p> <p>Proposals for development must ensure adequate protection, enhancement, compensation and / or mitigation, as appropriate are given to distinctive local features which characterise the landscape and heritage assets of Babergh’s built and natural environment within designated sites covered by statutory legislation, such as AONBs, Conservation Areas, etc. and local designations such as Special Landscape Areas and County Wildlife Sites, and also local features and habitats that fall outside these identified areas. In particular proposals should protect and where possible enhance the landscape and heritage areas including habitats and features of landscape, historic, architectural, archaeological, biological, hydrological and geological interest. Adaptation or mitigation will be required if evidence indicates there will be damaging impacts if a proposal is otherwise acceptable and granted planning permission.</p> <p>With regard to the SPAs, SACs and Ramsar sites any development that would have an adverse effect on the integrity of a European site <u>including candidate / proposed sites</u> either alone or in combination with other plans or projects will be refused (see Note 2).</p> <p>Note 1: Mitigation, adaptation and enhancement will need</p>

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			<p>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.</p> <p>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. <u>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.</u></p> <p>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.</p>
34	89	Para 3.5.2 & Policy CS14	<p>Make the following modifications to para 3.5.2 and to Policy CS14 to reflect matters that were raised through the examination process.</p> <p>Para 3.5.2</p> <p>Nationally, and in East Anglia, Gypsy and Traveller communities are amongst the most deprived groups with poor access to accommodation, health, education, employment and other opportunities. <u>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</u></p>

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			<p><u>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.</u></p> <p>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.</p> <p>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.</p> <p>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</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>Policy CS14: Mix and Types of Dwellings</p> <p>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.</p> <p><u>The mix, type and size of the housing development will be expected to reflect established needs in the Babergh district (see also Policy CS10).</u></p> <p>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.</p> <p>New pitches / plots will be provided at an appropriate level and in suitable locations to meet the identified needs of Gypsies and Travellers / <u>Travelling Showpeople</u> 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</p> </div>

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			<p>to the settlement pattern and depending upon the nature of identified need. <u>The Council will continue to work on cross-boundary matters with neighbouring authorities to meet identified needs for transit site pitches.</u> Proposals <u>for new pitches / plots</u> will be assessed against the policies of this Local Plan (particularly Policies CS1 and CS10) and relevant policies of subsequent DPD(s).</p> <p>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.</p>
35	93	Policy CS15	<p>In respect of Matter 6 (Affordable Housing), the Council wishes to promote the following modification to reflect the discussions, issues raised and questions asked by the Inspector through the examination process:</p> <div data-bbox="544 1167 1493 2051" style="border: 1px solid black; padding: 10px;"> <p>Policy CS15: Affordable Homes</p> <p>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 <u>the New Strategic Broad Location for Directions of Growth and in Core / Hinterland Villages (Note 4)</u> in Area Action Plan and Site Allocation DPDs.</p> <p>Where the proposed development is for only one or two dwellings¹, and where affordable homes cannot be provided on site, a commuted sum will be required². The tenure types, mixes and sizes of affordable homes will reflect established needs in the District³. 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.</p> <p>Note 1: * Where a net gain of dwelling(s) is involved</p> <p>Note 2: Supplementary guidance will be produced for the time of the policy’s introduction to make clear the contributions to be</p> </div>

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			<p>required and will be regularly updated</p> <p>Note 3: As reflected in the most up to date Strategic Housing Market Assessment and Tenancy Strategy or other relevant evidence</p> <p><u>Note 4: Where this is justifiable and supported by up-to-date viability evidence</u></p>
36	99	Policy CS17	<p>Add the following sentence in the lower case text preceding Policy CS17</p> <p><u>Ensuring that delivery of new homes and jobs is supported by evidence based need for physical and social infrastructure required is critical to achieving successful sustainable development. Compliance with Policy CS17 is therefore crucial to the delivery of growth and particularly the implementation of policies CS3, 3a, 4, 5, 5a, 5b, 6 and 6a.</u></p>
37	104 & 107	Glossary	<p>Amend the following entries as follows:</p> <p>Development Plan - Under current legislation and regulations, the statutory planning framework for a particular locality (or even group of them) is made up of <u>a Local Plan and other Development Plan Documents (which may comprise one or more documents)</u> an LDF and currently the regional plan. The Localism Act Bill (2010 – 2011), when enacted, will abolish ed Regional Strategies <u>in January 2013.</u> (National planning policy / guidance does not form part of the statutory development plan).</p> <p>Regional Spatial Strategy (RSS) – <u>Formerly provided</u> The broad spatial strategy (i.e. regional plan) for the region prepared by the former East of England Regional Assembly, and that prior to January 2013, formed part of the statutory Development Plan. The East of England RSS was adopted in May 2008 <u>and abolished following the Localism Act in January 2013.</u> The Localism Bill, when enacted, will abolish Regional Strategies including the East of England Plan.</p>