



Babergh & Mid Suffolk Joint Local Plan Preferred Options

Consultation Document

July 2019

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01 Introduction

1.1 The Babergh and Mid Suffolk Draft Joint Local Plan (hereafter referred to as ‘the Draft JLP’) is an important document which will provide the strategy for the growth of Babergh and Mid Suffolk. It will set out the strategy for development up to 2036, including land allocations. Once adopted, the Draft JLP will replace the existing local planning policies for both Babergh and Mid Suffolk.

What is the purpose of this consultation?

1.2 The purpose of this consultation is to seek your views on the identified planning issues, options and policy preference for Babergh and Mid Suffolk.

1.3 This consultation is your opportunity to identify the planning issues that you think the Plan should address in your communities and comment on possible ways that the plan might address these important issues in your communities. The more information you can respond to, the greater your opportunity to shape the future of the area.

1.4 Please submit your comments via the online consultation system, email localplan@baberghmidsuffolk.gov.uk or post responses to Joint Local Plan consultation, B&MSDC, Endeavour House, 8 Russell Road, Ipswich, IP1 2BX.

Why do we need a Plan for Babergh and Mid Suffolk?

1.5 Planning involves weighing up economic, social and environmental factors to achieve the most balanced and sustainable way forward.

1.6 The current development planning system was established through the Planning and Compulsory Purchase Act 2004 and subsequent amendments, such as the Localism

Act 2011 which introduced neighbourhood plans. The national approach to planning policy matters is set out principally in the new National Planning Policy Framework (NPPF 2019), Planning Practice Guidance and other but also within documents covering specific topics such as the Marine Policy Statement and Planning Policy for Travellers Sites.

1.7 The NPPF 2019 sets a presumption in favour of sustainable development, requiring that local planning authorities plan positively to meet the development needs of their area. The Draft JLP policies for Babergh and Mid Suffolk will sit alongside the NPPF, 2019, and where appropriate supplement policies based upon local circumstances.

1.8 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004) once adopted, the policies and allocations set out in the Development Plan will provide the primary consideration in determining applications, unless material considerations indicate otherwise.

Babergh and Mid Suffolk’s Current Development Plan

1.9 The current Development Plan for Babergh consists of the saved policies of the Babergh Local Plan, Alteration No. 2 (2006), the Babergh Local Plan (2011 – 2031) Core Strategy and Policies (2014) and the ‘made’ (adopted) neighbourhood plans¹. For Mid Suffolk, the Development Plan comprises the saved policies of the Mid Suffolk District Local Plan (1998), the First Alteration to the Mid Suffolk Local Plan (2006), the Mid Suffolk District Core Strategy Development plan Document (2008), and the Mid Suffolk District Core Strategy Focused Review (2012), the Stowmarket Area Action Plan (2013) and the ‘made’ (adopted) Neighbourhood Plans². The Minerals Core Strategy (incorporating Development Control Policies) (2008), the Minerals Specific Site Allocation Plan (2009),

¹ <https://www.babergh.gov.uk/planning/neighbourhood-planning/>

² <https://www.midsuffolk.gov.uk/planning/neighbourhood-planning/>

and the Waste Core Strategy Development Plan Document (2011) produced by Suffolk County Council also form part of the Development Plan. The new Joint Local Plan will replace the Local Plans and alterations (saved policies), the Core Strategies, and the Stowmarket Area Action Plan.

1.10 When made (adopted), any new Neighbourhood Plans shall also become part of the development plan and shall be considered alongside the Joint Local Plan when determining planning applications. In 2019, a number of Neighbourhood Plans have already been adopted across the Babergh and Mid Suffolk areas. A further 40+ parishes have been subject of area designation and plans for these areas are at various stages of preparation. Neighbourhood Plan groups have an opportunity to work with the relevant District Council in order to share information and bring sites forward for allocation where they would assist to meet the levels of growth in the Joint Local Plan.

The new Joint Local Plan

1.11 The Draft JLP will set out planning policies to set the context for protecting the Districts' valuable natural and built environment and ensure that new development is delivered in a sustainable way.

1.12 The Draft JLP is primarily based upon and in conformity with national planning policy and legislation, whilst having full regard to relevant strategic and locally significant matters.

Why do we need a Plan to deliver growth?

1.13 In accordance with the NPPF standard methodology the Draft JLP has to accommodate identified housing needs along with employment and community facilities and services in Babergh and Mid

Suffolk respectively. The new Joint Local Plan will set out a strategy to accommodate this in full in accordance with national policy requirements. Preventing growth across the two Districts is not an option. Levels of housing need in the area are high and new homes will have to be provided to meet this need.

1.14 Rates of annual housing delivery in Babergh and Mid Suffolk have been approximately 20% below the levels of current delivery since 2014/15. From 2018 onwards the annual rate of housing to be delivered has also increased by around 30%-40% in each council area, compounding delivery issues. A 'plan led' approach is fundamental to shaping future delivery and provides a mechanism to coordinate the delivery of infrastructure necessary to support growth. Development should be planned to secure the delivery of key infrastructure projects across the County, such as the improvements to the A14 network as well as localised infrastructure schemes within communities.

The Plan

1.15 The Plan will be set out in 3 parts:

- I. Part 1 – Objectives and Strategic Policies
- II. Part 2 – (a) Non Strategic Delivery Policies
- III. Part 2 – (b) Non Strategic Place and Allocation Policies.

1.16 Part 1 sets out the strategic policies to address Babergh and Mid Suffolk's priorities for the development and use of land by establishing the overall strategy for the pattern, scale and quality of development (and any relevant cross boundary issues). The policies will make sufficient provision for:

- a) Housing (including affordable) employment, retail, leisure and other commercial development;
- b) Infrastructure; and
- c) Conservation and enhancement of the natural, built and historic environment, including landscapes and green

infrastructure, and planning measures to address climate change mitigation and adaptation.

1.17 Part 2 (a) will include more detailed policies for management and delivery of types of development and (b) detailed policies for specific places and neighbourhoods. This includes new housing and land allocations, provision of infrastructure and community facilities (such as schools, healthcare and cultural facilities) at a local level, establishing design and construction principles, conserving and enhancing the natural and historic environment and setting out development management policies.

1.18 The Draft JLP will articulate policies to influence delivery across four priority areas that your district councillors have identified will have the most positive impact on that future:

- Housing;
- Economy;
- Environment;
- Healthy Communities & Infrastructure.

1.19 The Councils of Babergh and Mid Suffolk, as the Local Planning Authorities, need to work with a large number of organisations and individuals to produce a local plan and determine planning applications. Alongside working with infrastructure providers and the New Anglia Local Enterprise Partnership, Babergh and Mid Suffolk District Councils work closely with the other local authorities across Suffolk, including with the County Council.

1.20 Viability is a factor which has a significant role and influence over planning policies and development proposals. The Draft JLP has to be deliverable. This means that the cost of meeting the requirements of policies combined with the costs of meeting national requirements, such as building regulations, and local infrastructure need to be assessed and factored into the emergence of all policy proposals and allocations.

Delivery & Places

1.21 The Draft JLP will have a focus upon managing the delivery of sustainable development which supports the areas' economic growth ambitions; the important rich historical and natural environment; the extensive network of existing communities; and enables development through facilitating the delivery of infrastructure.

1.22 The Draft JLP will have regard to emerging neighbourhood plans being prepared in the District and will provide a context for new neighbourhood plans to be prepared against.

Local Plan Timetable

1.23 The Draft JLP is reaching an advanced stage where the Councils' proposed policy approach has been set out for public consultation in this document. The next stage of the Plan (Regulation 19) will involve a final consultation where upon comments can only be formally accepted where they relate to matters of soundness or legal compliance. Comments at the final stage of the JLP will be sent for consideration by an independent Planning Inspector who will conduct an Examination of the Plan³. The Joint Local Plan shall be supported with a sustainability appraisal and appropriate assessment at all the relevant stages of consultation.

³ <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

02 Babergh and Mid Suffolk Profile and Context

Context

2.1 Babergh and Mid Suffolk are predominantly rural districts covering the geographical centre of Suffolk, running from the boundary with Essex in the south to the boundary with Norfolk in the north. This covers a total area of approximately 565 square miles.

2.2 Babergh and Mid Suffolk Councils work collectively to deliver a shared priorities as set out in the Joint Strategic Plan (2016 – 2020). The main priority areas are the economy, environment, housing and communities. The Draft JLP provides the mechanism to enable the delivery of the spatial elements of vision and priorities.

and the main line railway between London/ Ipswich/Norwich and Cambridge. Babergh has less accessibility with a smaller proportion of its area served directly by the east A12 and north by the A14 and no main line railway stations.

Profile

2.3 The population of Babergh District is 87,740; Mid Suffolk population is 96,731 (Census, 2011). Across Babergh and Mid Suffolk more than half the population live in villages and rural areas. In combination both districts have six main centres; which include Eye, Needham Market and Stowmarket in Mid Suffolk; Pinewood, Hadleigh and Sudbury in Babergh. The historic market towns are surrounded by a rural hinterland comprising 198 rural parishes.

2.4 Babergh and Mid Suffolk are heavily influenced by large centres of population with Ipswich in the east, Bury St Edmunds in the west, Diss and Harleston in the north. This is reinforced by the area's strategic transport connectivity with main road and rail links including the A12/A14/A140 main roads from London to Felixstowe and Cambridge, together with main line rail links from London, to Cambridge and Norwich and a strategic link for freight traffic from Felixstowe to Nuneaton in the Midlands. A large portion of Mid Suffolk has direct access to the A14

PART 1

OBJECTIVES AND STRATEGIC POLICIES

03 Vision and Objectives

3.1 The Draft JLP Plan sets the spatial vision of the place that Babergh and Mid Suffolk will become by 2036 based upon the following key priorities:

- Enabling economic growth;
- Enhancing and protecting the environment;
- Delivering housing; and
- Supporting strong and healthy communities & delivering Infrastructure.

3.2 To contribute to the delivery of the vision and priority areas the Draft JLP will set out an ambitious growth agenda which will prioritise the infrastructure investment required to deliver the growth ambitions and will identify the locations for delivering the necessary housing, employment and recreational growth and development.

Objectives

3.3 The proposed objectives for the Plan are as follows:

Housing:

- i. Delivery of the right types of homes, of the right tenure in the right place meeting need.

Economy:

- ii. Encourage the development of employment sites and other business growth, of the right type, in the right place and encourage investment in infrastructure, skills and innovation in order to increase productivity.
- iii. To encourage inward investment to the Districts by supporting infrastructure improvements that will enable the continued growth of Felixstowe and strengthen the Districts' links to Felixstowe and the rest of the UK.
- iv. To support the 'Ipswich Northern Route' transport project and the strengthening of Ipswich and the surrounding area as the key economic driver of the County.

Environment:

- v. To protect and enhance environmental assets (including landscapes, biodiversity, green spaces, air and water quality, and river corridors) for current and future generations.
- vi. Ensure new development avoids areas of flood risk and reduce future flood risk where possible

Healthy Communities & Infrastructure

- vii. To enable all communities to thrive, grow, be healthy, active and self sufficient through supporting the provision of the necessary infrastructure
- viii. To support communities to deliver plans and projects at the district and neighbourhood levels, specifically providing opportunities for the District Councils supporting communities on the development on neighbourhood plans.
- ix. To work with the communities of Sudbury and Stowmarket in the development of a vision and strategy for both towns.

Key Social Issues

i. Delivering Housing

Significant numbers of new homes need to be planned for over the Plan period along with employment and community facilities and services in Babergh and Mid Suffolk respectively.

ii. Achieving an Uplift in Delivery

Rates of annual housing delivery in Babergh and Mid Suffolk have been consistently below target. The number of homes to be delivered per annum has increased with the application of the Standard Methodology which means that from 2018 onwards the annual rate of housing to be delivered has also increased by around 40% in each council. The revised uplift in housing numbers compounds the challenges of delivery.

iii. A Growing & Ageing Population

By 2036 the population in Babergh is expected to grow by around 7,300 people in Babergh and by approximately 9,300 people in Mid Suffolk, an increase of 8% and 9.2% respectively⁴. The increasing age of the population is a significant factor contributing to the overall level of population growth. Both Districts have an ageing population with 45 to 59-year olds representing the single largest age group at present. In addition, a significant percentage of the population are aged 65 years or older (26.2% in Babergh and 24.5% in Mid Suffolk)⁵. Babergh and Mid Suffolk also have a relatively long-life expectancy at about 81 years for males and about 84 years for females. As the population ages, there will be different demands on housing, infrastructure, services and facilities.

iv. High Levels of Housing Need and a Poor Affordability

House prices on average are more than 11 times above the average earnings of residents in Babergh and 9 times above the average earnings in Mid Suffolk and rural parts of the Districts are unaffordable for many.⁶

⁴ ONS 2016-based population projections

⁵ ONS 2016-based population projections

⁶ ONS Affordability Ratio - March 2019

Key Economic Issues

i. Improving Business Growth and Productivity

Babergh and Mid Suffolk have below average productivity levels, skills and attainment levels, and earnings are lower than average levels.

ii. Economic Base

The economic base is diverse. Projected growth sectors in the area include tourism; creative industries; food production, construction and related services; hospitality/ leisure.

iii. Business Formation

Babergh is near the level of the county with regard to the level of business formation rates, however Mid Suffolk currently holds the lowest rates in Suffolk.

iv. Further diversifying the economic base and encouraging investment in infrastructure, skills and innovation is a priority.

v. Employment levels and projections

Babergh recorded a decline in the total employment rate to 68.3% relating to the population between 16 and 64 years (working age) over the past couple of years. This decline is likely to continue as the working-age population is expected to fall. Mid Suffolk recorded a small increase of the average percentage of the total employment rate to 80.5%. A 9.3% increase in jobs is projected in Babergh and 14.7% in Mid Suffolk increase from 2014 – 2036, which represents a slow down when compared with past trends. The overall growth in jobs is expected to be driven by growth in the Professional and Business Services.

vi. Town centre occupation

The vacancy rates in town centres in Babergh & Mid Suffolk are below the national average. However, it is acknowledged that there is a need to enhance the town centres.

Key Environmental Issues

i. Environmental Assets

The Districts have a rich historic natural environment, with a number of protected areas such as Sites of Special Scientific Interest (SSSI) sites, Special Protection Areas (SPAs) and Areas of Outstanding Natural Beauty (AONBs).

There are a number of priority habitat / species identified as being in an adverse condition. Babergh is part of the Suffolk Coast and Heaths AONB and Dedham Vale and Stour Valley AONB. Suffolk Coasts and Heaths AONB are currently reviewing their boundary which includes significant areas north of the River Stour.

Cross Street Sudbury is identified as an Air Quality Management Area and the 2016 Air Quality Annual Status Report sets out approach to reduce nitrogen dioxide concentration.

Both districts have a high volume of Grade 3 Agricultural Land and limited available previously developed land.

Recycling performance is currently lower than the County average in both districts.

ii. Heritage Assets

Babergh and Mid Suffolk are rich in heritage assets. In Babergh there are 29 designated conservation areas, 2,985 listed buildings, 34 scheduled monuments and 5 registered parks and gardens which represent about 20% of the estimated 13,700 designated Heritage Assets in Suffolk. In Mid Suffolk there are 31 designated conservation areas, 3,419 listed buildings, 36 scheduled monuments and 2 registered parks and gardens; which represents more than a quarter of all Heritage Assets in Suffolk⁽¹⁾.

iii. Climate Change

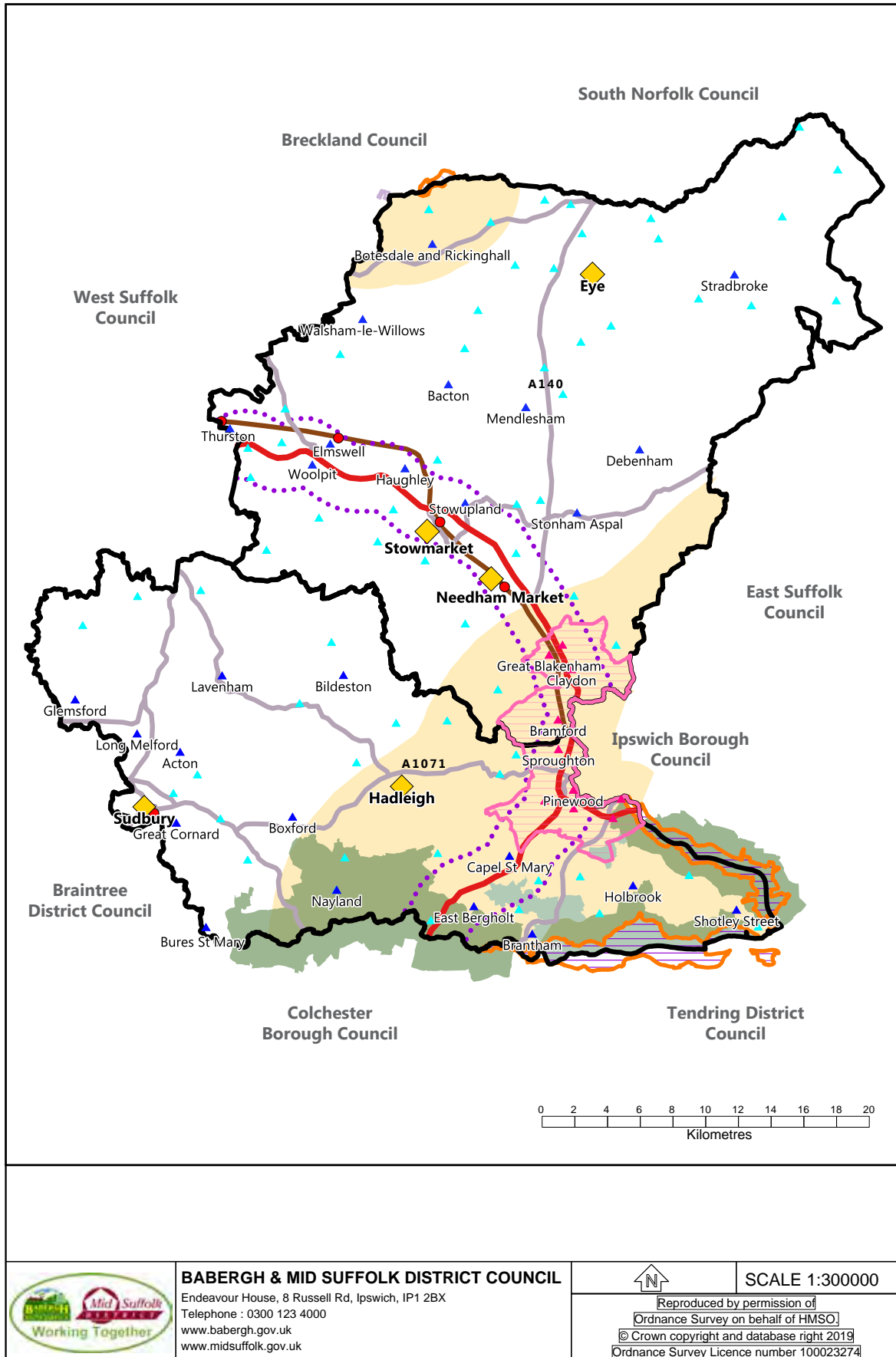
There is a national requirement to future proof against climate change including reducing carbon emissions, diversifying energy provision and using sustainable construction and design methods.

For Babergh and Mid Suffolk there is a particular need to introduce measures that address water scarcity. There is a need to improve ground water quality, potable water supply and the wastewater infrastructure.

(1) Historic England May 2016, Heritage Counts, April 2014.

Key Diagram

3.4 The core features of the Plan area and the general pattern for growth are shown on the key diagram.



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Key

-  District Boundaries
-  Ipswich Fringe Area
-  Strategic Employment Sites
-  Strategic Transport Corridor

-  Market Towns and Urban Areas
-  Ipswich Fringe Settlements
-  Core Villages
-  Hinterland Villages

-  A12/ A14
-  A Roads
-  Railway Lines
-  Railway Stations

-  Areas of Outstanding Natural Beauty
-  Proposed Extensions to Areas of Outstanding Natural Beauty
-  Ramsar Sites
-  Zones of Influence for European/ Habitat Sites
-  Special Areas of Conservation
-  Special Protection Areas

04 Implementation

- 4.1 In accordance with national planning legislation, the adopted planning policies in Babergh and Mid Suffolk districts will be kept under review at least every 5 years. A review of the planning policies will consider whether all, or specific parts, of the suite of policies are in need of amendment, for example in order to update for consistency with relevant national planning policies, where identified local development needs change significantly or where policies are not performing as intended.
- 4.2 The Councils will adopt a ‘plan, monitor, manage’ approach where key information regarding the Joint Local Plan (such as housing delivery), and other planning document production progress will be reported in the annual Authority Monitoring Report (AMR). The requirements for the Authority Monitoring Report (AMR) are found in the Town & Country (Local Planning) (England) Regulations (as amended)⁷.
- 4.3 In order to assess the performance and impacts of the Joint Local Plan, a monitoring framework of indicators/data will be set out covering housing, economic and environmental issues. Data will include information which the Councils collect themselves as well as key data which is collected and reported on by other key bodies.

⁷ <http://www.legislation.gov.uk/uksi/2012/767/regulation/34/made>

05 Duty to Cooperate

What is the Duty to Cooperate?

5.1 The Duty to Cooperate is applied to local planning authorities by **Section 110 of the Localism Act 2011** and requires the Councils to apply the Duty to Cooperate in relation to planning of sustainable development. It is a prerequisite test for the Examination of Local Plan production.

5.2 Section 3 of the National Planning Policy Framework (NPPF) (February 2019) sets out a Local Planning Authority's approach to plan-making. Paragraph 17 identifies that 'The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area'⁸. Paragraph 20 goes on to state that the 'Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.⁹

5.3 National planning policy in the NPPF (paragraph 27) also identifies that strategic policy-making authorities should maintain one or more statements of common ground to document the cross-boundary matters being

addressed and the process in cooperating to address these. Further information regarding the Duty to Cooperate can be found on the Government national planning practice guidance website at <https://www.gov.uk/guidance/plan-making>.

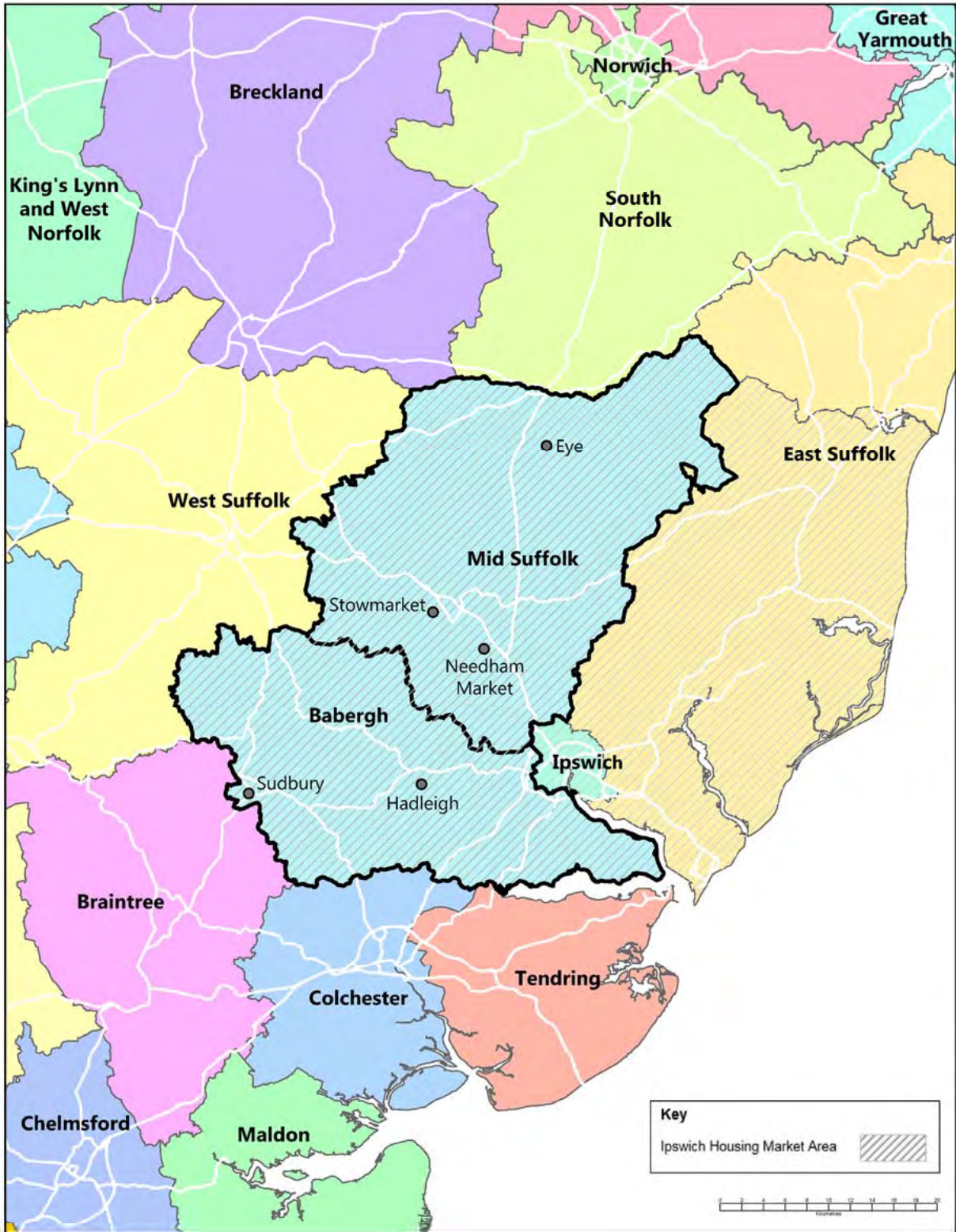
What are we cooperating on?

5.4 The full list of bodies in the Duty to Cooperate is set out in **Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012**.

5.5 The Councils in the Ipswich Housing Market Area (HMA), namely Babergh District Council, East Suffolk Council (formerly Suffolk Coastal District Council), Ipswich Borough Council, and Mid Suffolk District Council already have a long history of cooperation on strategic planning matters. The planning area of the Ipswich HMA is also known as the Ipswich Strategic Planning Area (ISPA).

⁸ Section 19(1B-1E) of the Planning and Compulsory Purchase Act 2004 cited in the National Planning Policy Framework (NPPF) (February 2019), paragraph 17, p. 8

⁹ NPPF (February 2019), paragraph 20, p. 9



Duty to Cooperate Map



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5.6 However, the geographical context of Babergh and Mid Suffolk Districts means that the districts need to be mindful of any potential cross-boundary matters that arise with Braintree District Council, Colchester Borough Council and Tendring District Council to the south, East Suffolk (formerly Waveney District Council) to the east, West Suffolk (formerly St Edmundsbury Borough Council) to the west, and Breckland and South Norfolk Councils to the north. These also

include Essex County Council and Norfolk County Council alongside Suffolk County Council.

5.7 A summary of the current key issues and identified partners which the Councils are cooperating with is identified in Table 1 below. As the Joint Local Plan (and other neighbouring Local Plans) develop, there may be additional key issues which also need to be considered.

Table 1 – Duty to Cooperate Key Issues

Key Planning Issue	Key Duty to Cooperate Partners
<p>Housing</p> <p>1) Defining housing market area and objectively assessed need</p> <p>Ipswich Housing Market Area (HMA) defined in Strategic Housing Market Assessment as including the whole of Babergh District, Ipswich Borough, Mid Suffolk District and Suffolk Coastal District (now part of East Suffolk Council).</p> <p>The Government introduced a standard method for calculating local housing need in 2018, which identifies a minimum local housing need per local authority area.</p> <p>Provision for Gypsies and Travellers to be met identified in the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodations Need Assessment (May 2017) for the Ipswich HMA authorities.</p> <p>The Strategic Housing Market Assessment Part 2 identified the size, type and tenure of housing needed, including the need for affordable housing, and this document was updated for the Ipswich HMA authorities in January 2019.</p>	<p>East Suffolk Council, Ipswich Borough Council, West Suffolk Council, Braintree District Council, Colchester Borough Council, Tendring District Council, Breckland Council, South Norfolk Council, Greater London Authority.</p>

<p>2) Resolving if unmet housing need is identified and the approach to delivery of the housing requirement.</p> <p>No duty to cooperate partners have identified any unmet need to be met by Babergh or Mid Suffolk District Councils.</p> <p>Each local authority area produces a Strategic Housing and Employment Land Availability Assessment (SHELAA) to assess housing supply potential.</p>	<p>East Suffolk Council, Ipswich Borough Council, West Suffolk Council, Braintree District Council, Colchester Borough Council, Tendring District Council, Breckland Council, South Norfolk Council, Greater London Authority.</p>
<p>3) Impact of bordering strategic housing developments.</p> <p>The Ipswich HMA authorities have jointly commissioned transport modelling evidence with Suffolk County Council. The impact of which is considering potential modal shift mitigation within the HMA.</p> <p>Suffolk County Council engage with both Essex County Council and Norfolk Council on strategic transport matters, which includes the A12 and A131 between Suffolk and Essex, and the A140 and A143 between Suffolk and Norfolk. The A14 within Suffolk goes through all four local authority areas. Strategic rail matters are also discussed between Suffolk local planning authorities. Strategic infrastructure matters will be identified in the Infrastructure Delivery Plan for Babergh and Mid Suffolk.</p> <p>The Ipswich HMA authorities have jointly commissioned a Settlement Sensitivity Assessment into identifying landscape sensitivity around Ipswich. However, no new cross-border sites are proposed by Babergh and Mid Suffolk for allocation.</p>	<p>East Suffolk Council, Ipswich Borough Council, West Suffolk Council, Braintree District Council, Colchester Borough Council, Tendring District Council, Breckland Council, South Norfolk Council, Essex County Council, Suffolk County Council, Norfolk County Council.</p>

Employment

4) Defining functional economic market area and objectively assessed need

The Employment Land Needs Assessment (ELNA) (March 2016) defines the functional economic area to cover the same area as the Ipswich HMA. This evidence identified employment need.

The distinct economic geographies identified by the ELNA included the Felixstowe / A14 corridor, the wider Ipswich Market Area, the A140 corridor, and rural and agricultural areas.

East Suffolk Council, Ipswich Borough Council, West Suffolk Council, Braintree District Council, Colchester Borough Council, Tendring District Council, Breckland Council, South Norfolk Council, New Anglia Local Enterprise Partnership.

5) Enterprise Zones and Local Development Orders

The New Anglia Local Enterprise Partnership's Space to Innovate zone, identifies ten Enterprise Zones within the Local Enterprise Partnership area. One is the Sproughton Enterprise Park in Babergh near Ipswich, and the other is the Stowmarket Enterprise Park. Both are along the A14 corridor.

Ipswich Housing Market (HMA) authorities, Suffolk County Council, New Anglia Local Enterprise Partnership.

6) Impact of bordering strategic employment land developments

The Ipswich HMA authorities have jointly commissioned transport modelling evidence with Suffolk County Council. The impact of which is considering potential modal shift mitigation within the HMA.

Suffolk County Council engage with both Essex County Council and Norfolk Council on strategic transport matters, which includes the A12 and A131 between Suffolk and Essex, and the A140 and A143 between Suffolk and Norfolk. The A14 within Suffolk goes through all four local authority areas. Strategic rail matters are also discussed between Suffolk local planning authorities. Strategic infrastructure matters will be identified in the Infrastructure Delivery Plan for Babergh and Mid Suffolk.

East Suffolk Council, Ipswich Borough Council, West Suffolk Council, Braintree District Council, Colchester Borough Council, Tendring District Council, Breckland Council, South Norfolk Council.

<p>The Ipswich HMA authorities have jointly commissioned a Settlement Sensitivity Assessment into identifying landscape sensitivity around Ipswich. However, no new cross-border sites are proposed by Babergh and Mid Suffolk for allocation.</p>	
<p>Retail, leisure & other commercial</p>	
<p>7) Enhancement and regeneration of retail centres</p> <p>Acknowledgement of the role of Ipswich town centre within the Functional Economic Area.</p>	<p>Ipswich HMA authorities, New Anglia Local Enterprise Partnership.</p>
<p>Infrastructure provision</p>	
<p>8) Provision and enhancement of strategic infrastructure improvements</p> <p>Strategic infrastructure provision to be identified through the Infrastructure Delivery Plan, in particular education, health and transport matters.</p> <p>Acknowledge the aspiration of a potential Ipswich Northern Route, with any delivery through future local plan reviews.</p>	<p>Ipswich HMA authorities, Suffolk County Council, Essex County Council, Norfolk County Council, Highways England, West Suffolk Clinical Commissioning Group, Ipswich and East Suffolk Clinical Commissioning Group.</p>
<p>Environmental protection</p>	
<p>9) Conservation and enhancement of natural and historic environment</p> <p>A Suffolk Coast recreational disturbance avoidance and mitigation strategy is being developed between the Ipswich HMA authorities and the entire East Suffolk Council areas.</p>	<p>Ipswich HMA authorities, Suffolk County Council, Natural England, Historic England and Environment Agency.</p>

How are we going to Cooperate?

- 5.8 The Councils are cooperating on many of the key relevant issues such as jointly commissioning strategic evidence and sharing consistent assessment methodologies with the other planning authorities in the Ipswich Housing Market Area.
- 5.9 The Ipswich HMA planning authorities meet regularly through the Ipswich Strategic Planning Area Board, and have published a signed Statement of Common Ground, which identifies potential cross-boundary matters to be addressed within the Ipswich Housing Market Area. Suffolk County Council and Natural England are also both signatories to the Statement of Common Ground. This Statement of Common Ground will be updated as each Local Plan within the HMA proceeds to adoption. A further Statement of Common Ground will be produced with those planning authorities outside of the Ipswich HMA as the plan proceeds to adoption.
- 5.10 Cooperation has taken place with infrastructure providers in preparing the Infrastructure Delivery Plan, in particular covering the key strategic infrastructure matters of education, health and highways. The Councils have also engaged with all partners through the preparation of the Joint Local Plan.

06 Housing Needs & Requirements

Policy background and explanation

6.1 National planning policy requires that local planning authorities produce Local Plans to meet, as a minimum, the identified future housing needs in the Plan area, as well as cooperate with neighbouring local planning authorities to meet the overall needs of the identified Housing Market Area (HMA) as a whole. The relevant HMA for the Babergh and Mid Suffolk area is known as the Ipswich HMA which consists of the entire districts of Babergh, Ipswich, Mid Suffolk and the area of the former Suffolk Coastal District Council.

6.2 To determine the minimum number of homes needed, the National Planning Policy Framework (NPPF) requires that strategic policies should be informed by a local housing need assessment, conducted using the Government's standard methodology for calculation local housing need¹⁰. The methodology is made up of a calculation

involving key publicly available Office for National Statistics (ONS) data on household growth projections and local housing affordability ratios. The methodology includes provision for a 'cap' on the new housing requirements to recognise the challenge facing local authorities where identified housing needs are substantially higher than existing targets.

6.3 Babergh and Mid Suffolk have undertaken to produce a Joint Local Plan document with many common policies, although the identified development needs and monitoring of performance will be undertaken and recorded for each respective local authority district area. The baseline year of the Joint Local Plan is April 2018, with the Plan end date of March 2036 (18 years). Using the standard methodology, the local housing need for Babergh and Mid Suffolk, and the Ipswich Housing Market Area is as follows::

Local Authority	Standard Method Total (2018 – 2036)	Annual Local Housing Need Target
Babergh	7,560	420
Mid Suffolk	10,008	556
<i>Ipswich Housing Market Area Total</i>	35,334	1,963

6.4 The local housing need represents a 'starting point' in identifying housing requirements for Babergh and Mid Suffolk. There are a number of other factors to consider when setting the housing requirement. The Strategic Housing and Employment Land Availability Assessment (SHELAA) indicates that there is a sufficient supply of land to meet the housing need set out in the standard methodology. National Planning Practice Guidance sets out that there may be circumstances where additional growth may be required. However, it is important to understand the likelihood of higher levels of growth being delivered.

The local housing need figures produced by the Government's standard methodology is significantly higher (approx. 30%-40%) than the current levels of housing delivery. This Plan aims to set out a proactive approach which can boost significantly the supply of housing land and delivery in the district, consistent with Government policy.

6.5 Babergh and Mid Suffolk are planning to meet their full identified local housing needs. Unmet housing need has not been identified to Babergh and Mid Suffolk by any neighbouring authorities either within the

¹⁰ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

Ipswich HMA or beyond it.

commitments as set out in the table below. These will contribute to meeting the overall requirement.

6.6 As at April 2018 a number of dwellings required are already accounted for via

	Local Housing Need Plan requirement (2018 to 2036)	Outstanding Planning Permissions (dwellings) as at 1.4.2018	Residual requirement (Local Housing Need minus outstanding planning permissions)
Babergh	7,560	4,036	3,524
Mid Suffolk	10,008	4,050	5,958

6.7 Delivery is a key challenge of the Joint Local Plan. In recent years the delivery of new housing has been below the adopted requirements and the new local housing need figure in both Districts. The Councils are taking proactive measures to improve delivery rates including, reviewing stalled planning permissions and investing in building new local houses. The Joint Local Plan is aiming to identify and create flexibility for more development across the districts and has identified a buffer of approximately 20% in the supply of land for new housing up to 2036 (see Spatial Distribution chapter).

demographics. The most up to date Strategic Housing Market Assessment (SHMA) will provide conclusions on the size of property needed in each tenure for the Districts as a whole. Currently, the Ipswich Housing Market Area – SHMA Update (January 2019) provides the most up to date evidence on the needs for mix and type of housing across the Districts over the plan period. This demonstrates that the greatest need is for two, three- and four-bedroom accommodation. If new evidence is produced on the mix and type of housing required during the plan period, this will be made available on the Councils’ websites in due course. The appropriate tenure mix of housing development is set out in the relevant affordable housing policies of the Joint Local Plan.

6.8 In addition to ensuring that enough new housing is being delivered, it is important to ensure that the right mix, type and size of new housing is delivered. This will provide a wide choice of homes and contribute towards sustaining mixed communities and

Preferred approach

Policy SP01 – Housing Needs

Across the plan area the mix, type and size of the new housing development will be expected to reflect established needs in the most relevant district needs assessment.

Babergh:

The Joint Local Plan will seek to deliver a minimum of 7,560 additional dwellings (420 dwellings per annum) within the Babergh district over the plan period (2018 – 2036).

Mid Suffolk:

The Joint Local Plan will seek to deliver a minimum of 10,008 additional dwellings (556 dwellings per annum) within the Mid Suffolk district over the plan period (2018 – 2036).

Discounted alternative approaches

6.9 No alternative options are put forward at this stage, as there is no evidence to suggest that

the housing requirement should be set at any level other than the local housing need figure.

07 Affordable Housing

Policy background and explanation

- 7.1 This Planning policy reflects the size, type and tenure of housing needed for different people in the community. Affordable housing is an identified need within Babergh and Mid Suffolk Districts as required by Paragraph 61 of the NPPF (2019).
- 7.2 Affordable housing is housing for sale or rent, for those whose needs are not met by the market, which includes housing that provides a subsidised route to home ownership and/or is for essential local workers. Annex 2 of the NPPF (2019) sets out the definition of affordable housing and is split into the following four main categories: affordable housing for rent, starter homes, discounted market sale housing and other affordable routes to home ownership.
- 7.3 High house prices across Babergh and Mid Suffolk Districts mean that it is difficult for people to purchase or rent a house on the open market. The evidence based SHMA (updated data January 2019) establishes Babergh and Mid Suffolk are within the Ipswich Housing Market Area (HMA). The 2014-based local housing need identifies the overall affordable housing requirement over the plan period is as follows:

Babergh District¹¹

- 7.4 The demographic projections identify there is estimated to be a total of 47,198 households that will be resident in Babergh in 2036. This is 1,203 more than the previous SHMA evidence of September 2017. The household type breakdown is as follows: one person 30.3%, Couple with no children 35.1%, Couple with child/children 20.0%, Lone parent 8.1% and other¹² 6.4%. The figures indicate that the number of 'other' households are expected to increase the most in Babergh (albeit from a

low base), followed by lone parent households. The number of couples with children is projected to remain largely unchanged.

- 7.5 For **Babergh** the overall profile of affordable housing appropriate to meet the population over the plan period derived from Local Housing Need is: 13.3% of housing to be Affordable Rented and 13.5% affordable home ownership (of which 6.8% could be Shared Ownership and 6.7% Starter Homes demand rather than requirement¹³) reflects the mix of housing that would best address the needs of the local population. But this does not take into account the funding that will be available to help provide subsidised housing, and government policy on the level of funding fluctuates within the national spending review process.
- 7.6 The table opposite shows the tenure & size profile required in Babergh over the next 18 years' plan period (2018 to 2036).

¹¹ Data based on 2014-based LHN (Local Housing Need) (SHMA January 2019)

¹² Other households include multi-generational households, student households, households of unrelated people sharing accommodation as well as other groups.

¹³ The SHMA (January 2019) identified people currently occupying private rented sector who may be potential purchasers (known as potential demand) of starter homes/discount market, but is currently not a requirement. More information from the government is due on this.

Babergh Affordable Housing Mix (tenure & size) 2018 - 2036					
Tenure & size	1 bed	2 bed	3 bed	4 or more bed	Total
Shared ownership	134 (26.4%)	165 (32.6%)	156 (30.9%)	51 (10.1%)	506
Social rent & Affordable rent	271 (27.6%)	228 (23.2%)	225 (22.9%)	259 (26.4%)	983
Discount home ownership & starter homes (demand)	106 (21.3%)	173 (34.8%)	145 (29.2%)	72 (14.5%)	496
Total	511	566	526	382	1986
Total per annum	28	32	29	21	110

Percentages calculated as the number of bedrooms required for each tenure. Please note percentages may not add up to 100% due to rounding.

Mid Suffolk District¹⁴

7.7 The demographic projections identify there is estimated to be a total of 53,855 households that will be resident in **Mid Suffolk** in 2036. This is 2,355 more than the previous SHMA evidence of September 2017. The household type breakdown is as follows: one person 27.6%, Couple with no children 37.4%, Couple with child/children 21.9%, Lone parent 8.3% and other¹⁵ 4.8%. The figures indicate that the number of lone parent households are expected to increase the most in Mid Suffolk, followed by 'other' households. Couples with children are projected to record the smallest rise.

7.8 For **Mid Suffolk** the overall profile of affordable housing appropriate to meet the population over the plan period derived from Local Housing Need is: 12.7% of housing to be Affordable Rented and 10.0% affordable home ownership (of which 5.8% could be Shared Ownership and 4.2% Starter Homes demand rather than requirement¹⁶) reflects

the mix of housing that would best address the needs of the local population. But this does not take into account the funding that will be available to help provide subsidised housing, and government policy on the level of funding fluctuates with the national spending review process.

7.9 The table below shows the tenure & size profile required in **Mid Suffolk** over the next 18 years' plan period (2018 to 2036).

¹⁴ Data based on 2014-based LHN (Local Housing Need) (SHMA January 2019)

¹⁵ Other households include multi-generational households, student households, households of unrelated people sharing accommodation as well as other groups.

¹⁶ The SHMA (January 2019) identified people currently occupying private rented sector who may be potential purchasers (known as potential demand) of starter homes/discount market, but is currently not a requirement. More information from the government is due on this.

Mid Suffolk Housing Mix (tenure & size) 2018 - 2036					
Tenure & size	1 bed	2 bed	3 bed	4 or more bed	Total
Shared ownership	147 (25.2%)	187 (32.1%)	148 (25.4%)	100 (17.2%)	582
Social rent & Affordable rent	289 (22.4%)	361 (28.0%)	303 (23.5%)	335 (26.0%)	1,288
Discount home ownership & starter homes (demand)	97 (22.5%)	143 (33.2%)	131 (30.4%)	59 (13.7%)	430
Total	533	691	582	494	2301
Total per annum	30	38	32	27	127

Percentages calculated as the number of bedrooms required for each tenure. Please note percentages may not add up to 100% due to rounding.

7.10 Where viability assessments are submitted the Council will expect applicants to clearly set out all of the assumptions and evidence behind the assumption that go into the appraisal. The supply of information must be presented on an open book basis using the Homes and Communities Agency Development Appraisal Tool (DAT model)¹⁷ including the calculation of residual land value and any cash-flow analysis. There must be no hidden calculations or assumptions in any model or appraisal. Viability assessments will be made publicly available. For the implementation of exceptional circumstances reference must be made to the development management policy on Affordable Housing.

7.11 Development appraisals must include details of the proposed scheme including site area, residential unit numbers, number of habitable rooms, unit size, density and the split between the proposed tenures. Floorspace figures must also be provided for residential uses (gross internal area) by tenure, and non-residential uses in gross internal area (GIA) and net internal area (NIA). Information should be provided relating to the target market of the development and proposed specification, which should be consistent with assumed costs and values. Details of the assumed development programme and the timing of costs and income inputs should be provided.

¹⁷ Homes & Communities Agency – Development Appraisal Tool: <https://www.gov.uk/government/publications/development-appraisal-tool> / Homes England or any successor appraisal model.

Preferred approach

Policy SP02 – Affordable Housing

The Joint Local Plan will seek to retain and deliver a 35% requirement for affordable housing on relevant sites of ten or more dwellings or sites of 0.5ha or more.

Proposals which provide a greater amount of affordable housing than that set out above will also be permitted, subject to the relevant Joint Local Plan policies.

In exceptional circumstances, where it is evidenced and justified and the Council is satisfied that the provision of affordable housing is not viable, the Council may agree to vary the requirement for affordable housing. A viability assessment will be required to demonstrate this.

Discounted alternative approaches

Alternative	Reason for discounting
Lower than the on-site affordable housing (AH) need requirement to the SHMA level.	It is not considered appropriate to lower the AH requirement as this would not be likely to deliver the identified district volume of AH overall (not every site contributes to AH). Viability is built into the preferred policy to enable flexibility in exceptional circumstances.

08 Settlement Hierarchy

Policy background and explanation

8.1 In considering the broad locations for new development, national planning policy requires that sustainable development is applied through balancing social, economic and environmental objectives. Development needs to be accommodated in settlements where the need to travel can be reduced through good access to facilities and services and where significant adverse impacts can be avoided or mitigated. In combination with the spatial distribution, the settlement hierarchy acts as a useful tool to enable these objectives to be met.

8.2 The Babergh and Mid Suffolk Ipswich fringe areas have historically been strategic designations as growth areas in recognition of the cross-boundary influence of the county town of Ipswich as a regional service centre. This strategic area will remain in the Babergh and Mid Suffolk Joint Local Plan. Similarly, settlements previously identified as Urban Areas and Market Towns in the previous adopted development plans will continue to be identified as such. This is in recognition of the significant service and facility provision they make to the wider catchment area.

8.3 A weighted scoring system has been used to indicate the relative sustainability of villages, by identifying Core Villages, Hinterland Villages and Hamlets Villages. Due to the dispersed nature of some settlements in Babergh and Mid Suffolk, the settlement hierarchy assesses the sustainability of settlements themselves rather than the wider parish. Settlements that do not have ten or more well related dwellings have not been identified in the settlement hierarchy. Such settlements are addressed in the Hamlets and Clusters of Development in the Countryside policy. The full methodology and criteria used to review the settlement hierarchy is available within the Topic Paper: Settlement Hierarchy 2019.

8.4 Each category of settlements will be required to contribute towards the future growth of the districts. It is important that development is proportionate to the provision of services and facilities within those settlements, and as such the Ipswich Fringe, Market Towns/ Urban Areas and Core Villages categories will take the largest levels of growth. The settlement hierarchy needs to be considered in combination with the Spatial Distribution. However, all settlements within each category are not equal, and there will be some variance in levels of growth dependent upon a number of factors including the availability of suitable development sites and considerations of the built and natural environment.

Preferred approach

Policy SP03 - Settlement Hierarchy

- A. In all cases the scale and location of development will depend upon the role of settlements within the settlement hierarchy defined in Table 2 and Table 3 and the spatial distribution, the capacity of existing physical and social infrastructure or new/enhanced infrastructure, as well as having regard to the built and natural environment.
- B. Ipswich Fringe settlements, Market Towns/Urban Areas and Core Villages will act as a focus for development, which will be delivered through site allocations in the Joint Local Plan and/or in Neighbourhood Plans, and windfall development in accordance with the relevant policies.
- C. Settlement boundaries have been created as defined on the Policies Map in order to demonstrate the extent of land which is required to meet the development needs of the Plan. New allocations are included within the defined settlement boundaries.
- D. Development within Hinterland and Hamlet Villages will be permitted within settlement boundaries where:
 - I. Design is sympathetic to its rural surrounding and demonstrates high-quality design by having regard to the relevant policies of the plan;
 - II. A high standard of hard and soft landscaping, appropriate for the location is used;
 - III. Hedgerows and treelines which make an important contribution to the wider context and setting are protected, particularly in edge of settlement locations; and
 - IV. The cumulative impact of proposals will be a major consideration.

Table 2 – Babergh Settlement Hierarchy

Classification	Settlement	
Babergh Ipswich Fringe	Belstead Copdock and Washbrook Pinewood	Sproughton Wherstead – Bourne Hill Wherstead Park
Babergh Market Towns and Urban Areas	Hadleigh Pinewood*	Sudbury
Babergh Core Villages	Acton Bildeston Boxford Brantham Bures St Mary Capel St Mary East Bergholt	Glemsford Great Cornard Holbrook Lavenham Long Melford Nayland Shotley Street Sproughton*
Babergh Hinterland Villages	Assington Belstead* Bentley Burstall Chelmondiston Chilton Cockfield – Howe Lane Copdock and Washbrook* East Bergholt – East End Elmsett Great Waldingfield Hartest Hintlesham Hitcham	Kersey Monks Eleigh Newton Polstead – Church Raydon Shotley Gate Stoke by Nayland Stratford St Mary Stutton Tattingstone – Church Whatfield Wherstead – Bourne Hill* Wherstead Park*
Babergh Hamlet Villages	Acton – Newman’s Green Aldham Alpheton Alpheton – Bridge Street Boxford – Calais Street Boxford – Stone Street Boxted Brantham – Stutton Road Brent Eleigh Brettenham Chattisham Chelmondiston – Pin Mill Chelmondiston – Ling’s Lane Chelsworth Cockfield – Cross Green	Lawshall – Bury Road Lawshall – Lambs Lane Lawshall – Street Lawshall – Lawshall Green Layham – Lower Layham – Upper Leavenheath – Harrow Street Leavenheath – High Road Leavenheath – Honey Tye Lindsey Lindsey Tye Little Cornard – Workhouse Green Little Waldingfield Milden

Classification	Settlement	
Babergh Hamlet Villages Continued	Cockfield – Great Green Cockfield – Mackenzie Place Cockfield – Windsor Green Cornard Tye Edwardstone – Mill Green Edwardstone – Sherbourne Street Elmsett – Rookery Road Erwarton Freston Great Cornard – Prospect Hill Great Waldingfield – Church Great Waldingfield – Upsher Green Groton Groton – Castlings Heath Harkstead Hartest – Cross Green Higham Hitcham – Cross Green Hitcham – The Drive Hitcham – The Water Run Holbrook – Lower Holton St Mary Kersey – Kersey Tye Kersey – Wicker Street Green Kettlebaston Little Cornard – Bures Road	Monks Eleigh – Swingleton Green Nedging Tye Polstead – Bower House Tye Polstead – Hadleigh Heath Polstead – Heath, Mill Street, Whitestreet Green Preston St Mary Preston St Mary – Whelp Street Raydon – Lower Raydon Shimpling Street Shotley – Church Somerton Stanstead Stoke by Nayland – Thorington Street Tattingsstone – Heath Tattingsstone – White Horse Thorpe Morieux Wattisham Wenham Magna Woolverstone

**Located within the Ipswich Fringe*

Table 03 - Mid Suffolk Settlement Hierarchy

Classification	Settlement	
Mid Suffolk Ipswich Fringe	Barham – Sandy Lane Barham – Bell’s Cross Road Bramford Claydon with part Barham	Great Blakenham Great Blakenham – Old Bell House Whitton
Mid Suffolk Market Towns and Urban Areas	Eye Needham Market	Stowmarket
Mid Suffolk Core Villages	Bacton Botesdale and Rickinghall Bramford* Claydon with part Barham* Debenham Elmswell Haughley	Mendlesham Stonham Aspal Stowupland Stradbroke Thurston Walsham-le-Willows Woolpit
Mid Suffolk Hinterland Villages	Badwell Ash Barham - Sandy Lane* Barking Beyton Brome Coddtenham Combs Creting St Mary Earl Stonham - Forward Green Felsham Finningham Fressingfield Gislingham Great Blakenham* Great Finborough Henley Hessett Horham Hoxne - Cross Street/Heckfield Green Hoxne - Low Street Laxfield Mellis	Mendham - Church Metfield Norton Occold Old Newton Onehouse Palgrave Rattlesden Redgrave Somersham Stonham Parva Stuston Thorndon Thwaite Tostock Wattisham Airfield Wetheringsett-Cum-Brockford - Church Whitton* Wilby Wortham Yaxley

Classification	Settlement	
Mid Suffolk Hamlet Villages	<p>Ashbocking Ashfield cum Thorpe Athelington Bacton - Earl's Green Bacton - Station Road Bacton – Cow Green Badwell Ash - Long Thurlow Barham – Bell's Cross Road* Battisford Battisford Tye Baylham Bedfield - Little Green Bedfield - Long Green Bedingfield – Church Bedingfield – Street Brundish Burgate Buxhall Combs - Moats Tye Cotton Creeting St Mary – Dunché's Lane Creeting St Mary – Jack's Green Creeting St. Peter Crowfield Denham Drinkstone Drinkstone Green Earl Stonham - Angel Hill Earl Stonham – Middlewood Green Flowton Framsden Gedding Gipping Gosbeck Great Ashfield Great Blakenham – Old Bell House* Great Bricett Great Finborough – Borough Lane Harleston Haughley - Green</p>	<p>Kenton Langham Little Blakenham Mendham – Withersdale Road Mendham - Withersdale Street Mendlesham - Green Mickfield Norton - Little Green, Ashfield Road Oakley Offton – Church Offton – Place Old Newton – Church Pettaugh Rattlesden - Poystreet Green, Top Road Redlingfield Ringshall Stocks Rishangles Stoke Ash Stonham Aspal - Mill Green Stowlangtoft – Church Stowlangtoft – Kiln Lane Stowupland – Saxham Street Syleham Thornham Magna Thrandeston Wattisfield Westhorpe Wetherden Wetheringsett-Cum-Brockford - Park Green and Wetherup Street Wetheringsett-Cum-Brockford - Brockford Street Weybread Wickham Skeith Wickham Street Wilby – Russel's Green Willisham Wingfield Winston</p>

Classification	Settlement	
Mid Suffolk Hamlet Villages Continued	Haughley - New Street Helmingham Hemingstone Hinderclay Hunston	Woolpit - Borley Green, Green, Heath Worlingworth Worham – Magpie Green Worham – Rectory Road Wyverstone

**Located within the Ipswich Fringe*

Discounted alternative approaches

Alternative	Reason for discounting
A review of settlements based upon recognising key facilities / services only.	Does not recognise the differing importance of different services and facilities to communities and in reducing the need to travel.
A review of settlements based upon the population or size of settlements.	Rural settlements of a significant size could be misrepresented if they do not have good access to key services and facilities.
An extended criteria range of services and facilities.	Would be unlikely to distinguish any significantly greater sustainability characteristics.

09 Spatial Distribution

Context

9.1 The Councils need to plan the right locations to meet the identified local housing and economic needs across the district areas. Growth has many key benefits including the securing of greater local investment, adapting and enhancing the local environment to modern living contexts, creating local job opportunities and ensuring local people have suitable and affordable homes to live in.

Housing

9.2 Since the 2001 Census, both districts have delivered housing growth predominantly (approximately 60%) in the rural areas. In recent years, both Babergh and Mid Suffolk districts have experienced difficulty in meeting the identified housing targets for the respective areas. The Councils are working to address this, including the production of an 'Action Plan' to focus upon the timely delivery of new housing. This Plan has identified a supply of development for the next 18 years from April 2018 up to March 2036. In constructing the spatial distribution of this Plan, the Councils have been mindful of the inherent market strengths within the area and have sought to ensure that the most suitable and deliverable sites are proposed. In many instances, this requires the complex alignment with infrastructure improvement programmes and investment to ensure that growth is planned in a sustainable manner.

9.3 A significant number of Neighbourhood Plans (NPs) are emerging throughout the Plan area, with a range of local issues and objectives being planned for. The District Councils have produced minimum housing requirement figures for these areas to assist the NP groups in the formation and progression of those plans. In identifying the respective NP requirement figures, the Councils have been mindful of their duty to ensure that the overall district Plan requirement figures can be met.

9.4 All outstanding dwellings (yet to be built) with planning permission as at 1st April 2018 have been assumed, leaving a residual amount to be found from new development locations. The total housing numbers in the Plan have been identified by combining the outstanding dwellings with planning permission as at 1st April 2018, with new development locations set out in the Plan.

9.5 Cumulatively, allocations of importance to delivery of the Joint Local Plan (in particular key infrastructure delivery and meeting local housing need) will be attributed to new housing growth in the following criteria:

- Key sites in the Ipswich Fringe
- Settlements along the A14/mainline railway corridor (Mid Suffolk)
- Settlements along the A12/mainline railway corridor (Babergh)
- Settlements requiring new school and/or healthcare sites.

9.6 The transport corridors of the A12, A14 and railway lines within the area represent a strong effect upon market forces and demand for both housing and employment land. Compatible growth along these areas can help to reduce the need to travel by ensuring closer location of where people live, relative to shops, services and employment. However, Babergh and Mid Suffolk are both rural districts, with a wide variety of settlement types and it is important that all communities throughout the area are helped to maintain vitality and services. Consistent with national planning policy, this Plan seeks to create flexibility and policies for appropriate rural growth.

Preferred approach

9.7 The spatial distribution of housing set out in this Plan seeks to secure a balance to growth in the strategic transport corridor areas, as well as ensuring that other market towns and rural communities benefit from appropriate growth. The Councils will closely monitor the ongoing annual delivery rates of housing

across the Plan area and will take appropriate, proactive action, if it is required to address delivery performance issues.

9.8 The specific new development locations are identified on the Policies Maps at the end of the document. The new development locations have been identified with consideration to consultation responses, the availability and deliverability of sites, the preferred spatial distribution pattern, the sensitivities and constraints of the area (eg. flood zones, heritage features and landscape designations etc) and the infrastructure capacity and opportunities (eg. schools and healthcare etc). Sites judged to perform best overall against the above criteria have been proposed in this document. Any alternative sites have been discounted as less consistent with the criteria overall. No other sites or alternatives have been considered where the most relevant Strategic Housing and Economic Land Availability Assessment (SHELAA) has considered them unsuitable.

9.9 Windfall sites are defined as sites not specifically identified in the development plan. As evidenced in the latest Annual Monitoring Report¹⁸, in the last four years, the volume of windfall dwelling completions has been significant, with a total of approximately 600 dwellings in Babergh and approximately 1,000 dwellings in Mid Suffolk. In addition to the supply of housing land identified in the Plan, the Councils have also included an allowance for new 'windfall' development of 500 dwellings (28 dwellings per annum) for each district between 2018 to 2036. This is considered a measured and reasonable allowance given the recent historic rates of windfall.

9.10 Whilst a new settlement approach has been discounted in this Plan (due to long lead in and delivery times), the Councils are mindful to give consideration to the longer term prospect of planning for a new settlement at the Plan review (due to be undertaken within 5 years of this Plan adoption). Some of the key criteria for the broad location of a new

settlement would likely include:

- a. significant land for a genuine discrete new settlement, or the realistic prospect for transformational development, both in nature and scale, of an existing settlement;
- b. opportunities for significant re-use of brownfield land;
- c. opportunities for improvement and integration of strategic transport routes;
- d. accessibility to job concentrations, or the realistic prospect for significant new employment land located with new homes; and
- e. opportunities to optimise new infrastructure delivery.

¹⁸ <https://www.babergh.gov.uk/planning/planning-policy/evidence-base/annual-monitoring-report-amr/>

Policy SP04 - Housing Spatial Distribution

Babergh

From April 2018 to March 2036, the broad distribution of new additional housing provision will be as follows:

Settlement Hierarchy	OPPs* (at 01/04/18)	New homes (2018-2036)	Total homes (2018-2036)
Ipswich Fringe	289	1,977	2,266 (24%)
Market Towns and Urban Areas	1,538	1,234	2,772 (30%)
Core Villages	1,481	1,169	2,650 (28%)
Hinterland Villages	585	309	894 (10%)
Hamlets	143	118	261 (3%)
'Windfall'	-	500	500 (5%)
Total	4,036	5,307	9,343

**Outstanding planning permission (% may not sum due to rounding)*

All identified home numbers are minimum figures. Allocations and settlement boundaries are identified on the Policies Maps.

Mid Suffolk

From April 2018 to March 2036, the broad distribution of new additional housing provision will be as follows:

Settlement Hierarchy	OPPs* (at 01/04/18)	New homes (2018-2036)	Total homes (2018-2036)
Ipswich Fringe	698	1,183	1,881 (15%)
Market Towns and Urban Areas	918	2,139	3,057 (25%)
Core Villages	1,527	3,721	5,248 (43%)
Hinterland Villages	662	512	1,174 (10%)
Hamlets	245	191	436 (4%)
'Windfall'	-	500	500 (4%)
Total	4,050	8,246	12,296

**Outstanding planning permission (% may not sum due to rounding)*

All identified home numbers are minimum figures. Allocations and settlement boundaries are identified on the Policies Maps.

Table 04 – Minimum housing requirement for NP Areas

Babergh

The numbers contained within the table include outstanding planning permissions granted as at 1st April 2018.

Neighbourhood Plan Area	Homes
Aldham	13
Assington	38
Bentley	52
Boxford	13
Capel St Mary	792
Chelmondiston	52
Chilton	11
Copdock and Washbrook	274
East Bergholt	241
Elmsett	50
Glemsford	37
Great Waldingfield	59
Hadleigh	675
Hartest	12
Holbrook	68
Lavenham	118
Lawshall	28
Leavenheath	44
Little Cornard	3
Little Waldingfield	16
Long Melford	217
Newton	23
Stoke by Nayland	27
Stutton	64
Whatfield	1
Woolverstone	31

Mid Suffolk

The numbers contained within the table include outstanding planning permissions granted as at 1st April 2018.

Neighbourhood Plan Area	Homes
Battisford	8
Beyton	31
Botesdale & Rickinghall	294
Debenham	278
Diss & District (covering the parishes of Brome & Oakley, Palgrave and Stuston)	64
Drinkstone	1
Elmswell	834
Eye	541
Fressingfield	56
Haughley	105
Laxfield	65
Mendlesham	161
Needham Market	497
Redgrave	12
Stowupland	752
Stradbroke	282
Thorndon	55
Thurston	1,468
Walsham le Willows	90
Wilby	12
Woolpit	727

Discounted alternative approaches

Alternative	Reason for discounting
New settlement	A new settlement option is not considered deliverable to the objectives of this plan at the present time, due to long lead in times and build out rates.
Focussed growth in Ipswich and Market Towns	Such an approach would limit delivery potential to meet diverse housing needs and would not stimulate rural economic vitality.

Economic

Economic Growth

9.11 Babergh and Mid Suffolk District Council's support a strong, responsive and competitive economy by encouraging development of employment sites and other business growth, of the right type, in the right place and encourage investment in skills and innovation in order to drive and increase productivity' (Joint Strategic Plan 2016 – 18 / Open for Business, Economic Strategy, 2018).

9.12 Data from ONS and Lichfields, 2017 shows that employment growth has not matched housing/population growth, and that there is a high level of out-commuting -as set out in the table below.

Location	Population		% Change in population 2001-2016	% Change in Total Employment 2001-2016	% of employed residents working within the District
	2001	2016			
Babergh	83,500	89,200	6.80%	8.50%	57.4%
Mid Suffolk	87,000	100,300	15.30%	1.60%	57.4%

9.13 Overall, the Lichfields Sector Needs Assessment shows that Babergh and Mid Suffolk have modest net additional employment land requirements (as indicated by the 2016 release of the EEFM). Combined, Babergh's requirement of 2.9ha and Mid Suffolk's requirement of 9.4ha indicates a total requirement across the area of 12.3 ha. In quantitative terms, there is therefore considered to be more than sufficient existing identified land to meet baseline objectively assessed need over the plan period, given the modest baseline forecast in both areas. This is predominantly on the former Sproughton Sugar Beet site / Sproughton Enterprise Park and the Stowmarket Mill Lane/Gateway 14 site, supported by small parcels of available land across the Districts' identified employment locations.

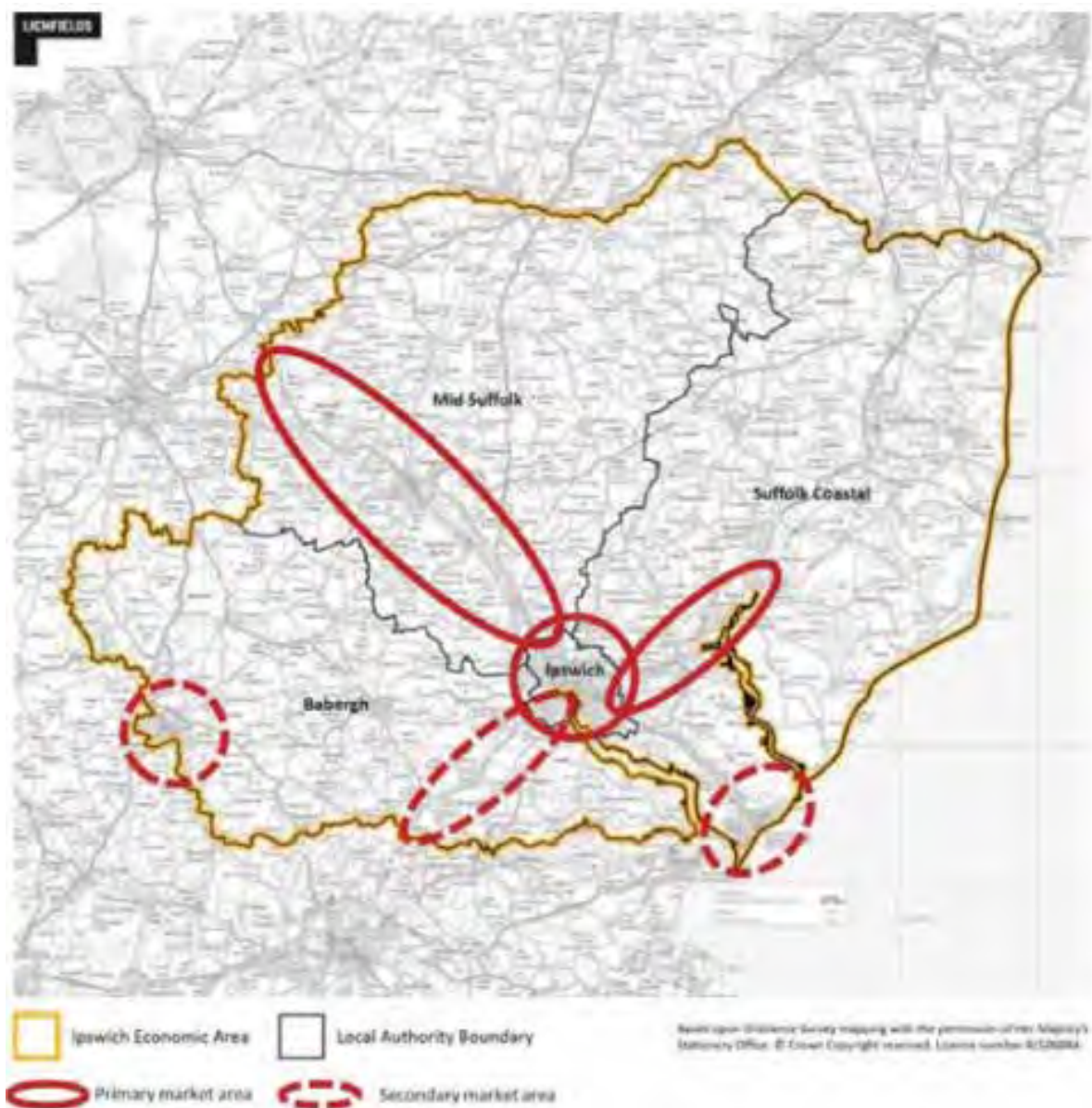
9.14 However, whilst baseline job forecast for Babergh and Mid Suffolk indicated modest land requirements up to 2036, sectoral forecasts identify higher growth potential in B class sectors in strategic locations largely mirroring the emphasis along the transport corridors. Other growth stimulants also facilitate higher growth in this plan period that is not reflected in historic EEFM trends that were gathered during the lengthy recession of the last 10 years. Drivers of growth include infrastructure investment in road, rail, and high-speed broadband and 5G, policy interventions through the Local Enterprise Partnership and other key bodies, availability of business support and grants, and Local Authority intervention in employment land supply through the purchase of sites to develop.

9.15 Deliverability of sites is critical, as while there may be a *quantitative* supply, the number of serviced and available sites is not reflected in that figure. As well as *quantitative* needs, there is a general qualitative need to improve premises options and update or replace ageing stock to meet modern energy efficiency performance demands, architectural attractiveness and premises format needs. Availability of sites with good road access, level land and availability of infrastructure is necessary. The policy framework must be responsive to the fast-paced change of sectoral needs and so the Councils will maintain an up to date Employment Land Review that monitors the supply of land & premises and employment conditions to add depth to the policy.

9.16 Flexibility to accommodate net strategic growth on strategic employment sites is essential to securing the future prosperity of the area. There are 8 main Strategic employment areas:

- Stowmarket
- Sudbury
- Villages around Ipswich
 - Claydon & Great Blakenham
 - Wherstead
 - Sproughton
- Acton
- Eye
- Hadleigh
- Needham Market
- Woolpit

9.17 Similarly, there is a need to ensure that employment opportunities exist throughout the Districts' villages to help to create sustainable communities and reduce the high rate of out-commuting. The economic importance of supporting the retention of a network of medium and small-scale clusters; both the larger single user occupied and the clusters of local businesses that provide local employment opportunities throughout the villages. Cumulatively these sites ensure the economic sustainability of Babergh and Mid Suffolk. Detailed policies to address the protection in the diversity in the type, scale and location of employment sites are set out in Part 2.



Lichfields, SNA 2017.

Policy background and explanation

Context

9.18 Babergh and Mid Suffolk are located within the Ipswich Economic Area (IEA), along with Ipswich and Suffolk Coastal. Within the IEA, the A14 road and rail corridor is the main arterial route for goods between Europe and the distribution warehouses in the English midlands. The corridor also aligns with the key commercial property market in the IEA from Felixstowe westwards to Stowmarket (Lichfields, 2017). The Cambridge Economic Area adjoins further to the west at Bury St Edmunds. The A140 and A12 also provide key arterial routes for the movement of goods and business activity. Elsewhere in the IEA the commercial centres of Hadleigh and Sudbury contain localised markets. Rural and agricultural areas make up the rest of the IEA with 11,300 square kilometres (or 4,366 square miles) classified as rural representing 94% of the total area (Lichfields, 2017).

9.19 Spatially in Mid Suffolk commercial activity is concentrated in and around the A14 corridor. The largest hub is at Stowmarket, followed by Needham Market, Great Blakenham and Claydon. The District's industrial market is relatively strong within Stowmarket, particularly focussed on manufacturing, distribution and logistics activity (Lichfields, 2017) including Muntons, PPG, Bacton Transport and Truck East. There is also a major employment hub on the former WWII airfield site at Eye to the north of the District which hosts manufacturers, wholesalers and agriculture businesses. Villages such as Mendlesham and Woolpit accommodate industrial estate employment. Outside of the main centres, the majority of rural employment sites in Mid Suffolk are relatively small and have grown organically in the location to serve local needs.

9.20 Babergh District is also largely rural in nature, with the economic hubs being located in the market towns of Sudbury and Hadleigh. Commercially property is

dominated by industrial uses with a number of international companies located in Sudbury including Nestle Purina, Siemens and Dupont. Concentrations of employment adjoins the Ipswich administrative area at Copdock Interchange Retail Park and Farthing Road Industrial Estate (Sproughton). Many smaller settlements contain clusters of businesses, such as at Bildeston. There are clusters of tourism businesses at Lavenham and Long Melford. The remainder of the District comprises rural businesses with diverse property needs.

9.21 Across Babergh and Mid Suffolk employment sites tend to comprise of the following:

Strategic Employment Sites / Locations

- Sudbury, Hadleigh, Acton, Claydon and Great Blakenham, Sproughton, Wherstead, Stowmarket, Needham Market, Woolpit & Eye.
- These accommodate the majority of industrial premises in a combination of B1, B2 and B8 uses.
- These are not always located in the main settlements, but mostly have good access to the major road network.
- These employment sites are individually strategic important to the District wide economy. They are functioning well and will remain the main core of industrial land and premises within the Districts. The business estates in these areas are generally operating at capacity.
- Within the Strategic sites are three (Food) Enterprise Zones: Sproughton Sugar Beet Regeneration site, Mill Lane/Gateway14 Stowmarket, and at Wherstead.

9.22 Strategic Regeneration opportunities are provided at the former Sugar Beet Factory at Sproughton and Brantham in the South of Babergh; both of which have a long-established industrial heritage.

Business and Enterprise Hubs

- i. Cumulatively important there is a network of over 100 smaller sites are dispersed throughout the Districts, providing lower-

- cost premises to SME businesses in the many small settlements.
- ii. Clusters containing multiple often-self supporting businesses.
- iii. Often converted from agricultural use these areas have developed organically over time.
- iv. These usually feature a mix of B1, B2 use, with small-scale B8.
- v. The needs and provision of these smaller sites are very different from the major industrial areas identified above.
- vi. Found within settlement boundaries as well as in isolated farm locations.

Strategic Single-user B-class site

- i. Large-format single-user sites found in rural sites – the result of an organic growth of a local business into a major business over many years.
- ii. Some sites have specific assets or

- characteristics that are specifically linked to the business sector or local needs, and can be difficult to replicate or replace on other sites such as waste handling, or sites with railway sidings.
- iii. Includes sites such as: Breheny, Aspell, and Copella.

Leisure, Retail, Tourism, Health, Social Care Site, and Other Major Employment Generators

- i. Non-B-class uses whose main focus is not employment, but is nevertheless a significant employer.
- ii. Includes locations such as MoD installations, hospitals, private schools, tourist facilities.

Policy SP05 – Employment Land

In order to support and encourage sustainable economic growth and ensure a continuous range and diversity of sites and premises which are fit for purpose are available across the Districts of Babergh and Mid Suffolk through the plan period the following existing strategic employment sites shall be protected and their proposed expansion supported in principle:

- i. **Stowmarket - Charles Industrial Estate, Gipping Valley, Gipping Way Industrial estate, Mill Lane/Gateway14, Tomo Industrial estate**
- ii. **Sudbury – Churchfield Road, Northern Road, Chilton Industrial Estate, Wood Hall Business Park, Delphi Site**
- iii. **Villages around Ipswich**
 - a) **Claydon & Great Blakenham – Claydon Business Park, Addison Way, Bramford Rd/ Lodge Lane Industrial Estate, Gipping Road Industrial Estate**
 - b) **Wherstead – Wherstead Business Park**
 - c) **Sproughton – Former Sugar Beet Factory Site, Farthing Road Industrial Estate, London Road A1214**
- iv. **Acton – Bull Lane**
- v. **Eye – Eye Airfield**
- vi. **Hadleigh – Lady Lane**
- vii. **Needham Market – Lion Barn**
- viii. **Woolpit – Lady’s Well, Lawn Farm, Brickworks, Woolpit Business Park**

Employment-led regeneration is supported at Brantham and at the Former Sproughton Sugar Beet Factory regeneration sites.

Policy SP05 *continued*

Along the strategic transport corridors (A12, A14 and A140) development of net additional employment sites shall be supported in principle, subject to:

- a. adequate highway access and off-road parking for its type, mix, use and location; and**
- b. design and layout sensitive to its surroundings, including any landscape or heritage assets; and**
- c. new buildings should demonstrate high-quality design by having regard to the relevant policies of the Joint Local Plan.**

Existing employment areas in towns, core villages and clusters in rural areas are identified in B&MSDC employment land assessments. These sites should be retained and their expansion supported where appropriate in scale, character and nature of the locality. These sites will generally be expected to continue to provide for local employment over the plan period. If sites are to be redeveloped for alternative non-employment uses, the alternative provision (a “land swap”) and / or contributions to enable alternative employment provision must be secured.

The 3 EZ designations are at:

- 1) Stowmarket Enterprise Park, Gateway 14, Mill Lane - a designated Enterprise Zone (EZ) site, is located within Phase I of employment land allocation Stowmarket Area Action Plan (SPD 2014) at Mill Lane, Stowmarket. Total employment land allocation within the SPD is 39.5 ha net, the Enterprise Park, that sits within Gateway 14, will contribute circa 17ha of serviced employment land. The EZ site is also a designated Food Enterprise Zone (FEZ). The total site extends to approximately 52 ha, of which 34 ha is developable land. This is a designated Enterprise Zone site, that will focus upon providing serviced employment land for development focussed upon B1, B2 and B8 uses.**
- 2) Sproughton Enterprise Park - The site is around 52 hectares and lies on the western edge of the Ipswich built up area. The site is allocated for employment uses in the current Babergh Core Strategy. The previously developed area is estimated to be in the region of 35.5ha, and the EZ is 14ha.**
- 3) The Orwell Food Enterprise Zone at Wherstead also offers business incentives to businesses in the food and beverage industries.**

Discounted alternative approaches

9.23 No alternative options are presented as not considered to be reasonable on the basis of the supporting evidence on the projected economic growth combined with the current land supply baseline position.

the Plan area. The Councils’ Retail and Town Centres Study (2015) has been used to identify the strengths, opportunities of key retail centres and the capacity for further retail and commercial leisure development in the Plan area.

RETAIL

Town centres, Retail & Leisure

9.24 As Babergh and Mid Suffolk are largely rural Districts, the towns and core villages within them serve an important function in the provision of shopping, employment and leisure opportunities. However, there is also a substantial influence of neighbouring major retail centres Ipswich, Bury St Edmunds and Colchester which are located just outside

9.25 Retail and leisure development will be directed sequentially to the towns in Babergh and Mid Suffolk and to the core and hinterland villages as defined in the settlement hierarchy. The relevant town centre boundaries, primary shopping areas, primary/secondary frontages and relevant policies are set out in Part 2 of the Plan.

9.26 The NPPF (Annex 2) defines the main town uses as: Retail development (including warehouse clubs and factory outlet centres);

leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres,

museums, galleries and concert halls, hotels and conference facilities).

Policy SP06 – Retail and Leisure

Proposals for new retail and town centre uses in the Plan area should be firstly prioritised to the strategically important retail settlements of Sudbury, Hadleigh and Stowmarket.

The settlements of Needham Market, Eye and Debenham have a district centre role where proposals may be appropriate where there are no suitable opportunities at the identified strategically important retail settlements.

Discounted alternative approaches

9.27 No alternative strategic options are considered reasonable. The approach is based upon evidence, is considered in accordance with NPPF and relevant to local circumstances.

10 The Economy - Tourism

Policy background and explanation

- 10.1 NPPF paragraph 83 – *To support sustainable rural tourism and leisure developments which respect the character of the countryside.*
- 10.2 The Tourism Sector is an important part of the Suffolk economy. Babergh and Mid Suffolk Districts are located strategically across southern and central Suffolk and includes Constable Country bordering into Essex, the Shotley Peninsula, the wool towns (including Lavenham, Kersey, Polstead and Hadleigh) as well as the Heart of Suffolk which contains Hadleigh, Needham Market, Stowmarket, Debenham and Sudbury.
- 10.3 Sustaining the tourism sector is essential for the Suffolk economy. The total value of tourism in Babergh to be worth some £188 million and provides 3,067 full-time equivalent (FTE) jobs (11% of all employment in the district). In Mid Suffolk, it was worth around £167million and provided 2,767 FTE jobs (9% of employment in the district) [Destination Research, the Economic Impact of Tourism, 2016].
- 10.4 Individual tourism and leisure facilities of strategic significance include
- Needham Lake;
 - Gainsborough's House; and,
 - The Museum of East Anglian Life.
- 10.5 Based on the heritage and agricultural origins of the area there are specialist clusters based on heritage, food and drinks with clusters of businesses located such as Muntons, Aspell, Copella and Jimmy's Farm. Specialist related events are also held around the stately halls of Helmingham, Melford and Kentwell Halls.
- 10.6 In order to support the unique tourism offerings of the facilities each are designated for tourism related purposes where the development and expansion of uses which enhance their tourism and leisure offer is supported in principle, where appropriate in the scale, character and nature of their locality.
- 10.7 Babergh District recognises the Dedham Vale AONB and Suffolk Coast and Heaths AONB as important to the tourism sector. The Dedham Vale AONB Management Plan 2016 and The Suffolk Coast and Heaths AONB Management Plan 2018 both acknowledge a key quality of the AONB is its ability to link economic well-being and the landscape, with a flourishing tourism industry, which draws on the natural beauty, tranquillity and historic assets within the AONB.
- 10.8 The National Planning Policy Framework encourages development of tourism initiatives in rural locations, provided the character of the countryside is respected, and pollution and other adverse effects on the local and natural environments are minimised. Sustainable tourism, as advocated in the adopted AONB Management Plans, is strongly supported in the implementation of tourism development throughout Babergh, but with particular regard to the AONB's.
- 10.9 In terms of commercial leisure capacity, the 2015 study identifies capacity for 4 new cinema screens in both districts. In 2018 The Regal Theatre in Stowmarket received a grant from Mid Suffolk District Council to fund two additional cinema screens. There is also an increasing demand for gyms and it is recommended that additional capacity could be supported in town centres, along with small scale ten pin bowling provision in the longer term.
- 10.10 To encourage visitors to support the economy of the two districts the 2015 study identified the need to explore potential family attractions and provide greater sustainable connectivity from the train stations to desirable destinations and attractions, through bespoke walking and cycle ways.

Preferred approach

Policy SP07 – Tourism

The historic settlements and the strategic tourism and leisure facilities which play an important role within Babergh and Mid Suffolk, and appropriate new development that supports this role will be encouraged, where appropriate in the scale, character and nature of their locality.

All proposals for development should comply with other policies in the Development Plan.

Discounted alternative approaches

10.11 No alternative strategic options are considered reasonable. The approach is supportive of this important economic sector, compliant with NPPF and includes criteria relevant to local circumstances.

11 Infrastructure

Policy background and explanation

- 11.1 The aim of the policy is to provide a policy framework for securing an appropriate level of infrastructure, including developer contributions and obligations. Applicants will be expected to demonstrate that existing, planned and/or committed infrastructure is sufficient to accommodate new development proposals.
- 11.2 Planning obligations are legally binding agreements entered into between a Local Planning Authority and a developer, which are intended to make development acceptable that would otherwise be unacceptable. Used effectively, planning obligations can increase the quality of development, however they must be reasonable and proportionate and directly relevant to planning and the proposed development.
- 11.3 The Councils have Community Infrastructure Levy (CIL) in place. This means that some types of new development must make a payment which will be used to fund infrastructure required to support development in the District. The amount of levy payable depends upon the size, type and location of the new development. Under the CIL regulations, where there is a 'made' neighbourhood plan in place, the Councils collect and transfer 25% of CIL revenues received from new development in that neighbourhood plan area to the Parish or Town Council. In areas where there is no made neighbourhood plan in place, the Councils collect and transfer 15% of CIL revenues received to Parish or Town Councils. However, CIL cannot be the single source of funding for all of the infrastructure required in the Districts. This is because certain types of infrastructure (such as new schools) need to be delivered through section 106 planning obligations in accordance with the Councils CIL Regulation 123 Lists.

- 11.4 Across Suffolk and beyond there are strong aspirations towards the delivery of key infrastructure projects, some of which will cross over administrative local authority boundaries.
- 11.5 The provision of infrastructure is fundamental to maintaining the quality of life, the prosperity and environmental credentials of the area. It is essential that any future growth and development is supported by infrastructure to meet the needs of the population, businesses and the wider community. There are a wide range of infrastructure types which need to be planned for which include infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); as well as community facilities (such as health, education and cultural infrastructure).

Strategic Infrastructure

- 11.6 The overall strategy for the pattern, scale and quality of development as set out in Joint Local Plan has been informed by the provision of existing capacity and the deliverability of new infrastructure provision. Further information on the assessment of infrastructure is set out in the Babergh and Mid Suffolk Infrastructure Delivery Plan (IDP).
- 11.7 To support the delivery of growth across Babergh and Mid Suffolk, the Councils will continue to work with service providers, statutory bodies and neighbouring authorities to ensure support for the timely delivery of the required infrastructure throughout the Plan period.
- 11.8 The key strategic infrastructure projects relevant to the Plan area include key highway improvements to the A road networks,

multiple secondary schools expansion programme, and the environmental protection of internationally important environmental designations in and around the Plan area.

11.9 A project for an Ipswich Northern Route highway between the A14 and A12 is being coordinated by Suffolk County Council. In January 2017, an initial study was published which looked at 3 potential routes and

a submission is due to be made to the Department of Transport for consideration. Babergh and Mid Suffolk Councils are both supportive of the Ipswich Northern Route project, and anticipate any appropriate detailed planning for this to take place in future iterations of the Plan.

11.10 Monitoring of infrastructure delivery and re-assessment of infrastructure requirements will be undertaken regularly.

Policy SP08 – Infrastructure Provision

Planning applications will be expected to include appropriate infrastructure provision. The delivery of planned growth set out in the Joint Local Plan is dependent upon the availability of infrastructure to support it. When making planning decisions, regard will be given to a core list of infrastructure constraints identified within the Councils' Infrastructure Delivery Plan and the associated Joint Local Plan evidence base. Applicants are required to mitigate the additional impacts their development will place on infrastructure.

The Councils will work with the relevant partners in supporting and enabling the delivery of key strategic infrastructure projects affecting the plan area which include:

- a. Highways improvements to the strategic road infrastructure on the A12 and A14, including an emerging Ipswich Northern Route, should the project receive endorsement from the Department of Transport during the lifetime of the Plan.
- b. A secondary schools expansion programme.
- c. Protected Habitat Sites Mitigation Zone.

Strategic infrastructure project areas will be identified for Protected Habitat Sites Mitigation Zones. Development proposals in these zones will be required to make appropriate contributions towards the relevant projects. The expansion of most secondary schools in the Plan area will be required to match the projected population growth. All development will also need to make provision for appropriate contributions towards community infrastructure, where the relevant locality to the development proposal has been identified through the Infrastructure Delivery Plan.

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

Discounted alternative approaches

11.11 No alternative strategic options are considered reasonable. The approach is based upon evidence, is considered in accordance with NPPF to support infrastructure delivery and relevant to local circumstances. Other infrastructure matters are recognised as important to the delivery of growth, but are considered to be of a more local nature and are addressed in the Places sections where appropriate.

Community Infrastructure

11.12 Community infrastructure is vital to ensuring that settlements of all scales can thrive and function in more sustainable ways. The role of community infrastructure such as healthcare, early years and primary education, and cultural infrastructure, is typically of a more localised nature, but the cumulative impact of deficits can be severe on a wide area.

11.13 Many communities within the Babergh and Mid Suffolk area, are in need of improvements to community infrastructure in order to support the overall and proposed distribution of growth. The Infrastructure Delivery Plan has identified what improvements to community infrastructure are requirement throughout the lifetime of the Plan. Development must have regard to this to ensure that appropriate and sustainable development can be supported. The allocations made in the Plan are accompanied by a clear list of infrastructure requirements which are considered necessary to bring them forward for development and have been subject to suitable viability testing.

12 Protection and Management of the Environment Strategic Issues

Strategic Issues

12.1 The aims of the Joint Local Plan are to ensure sustainable development can be achieved whilst supporting the objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including a low carbon economy NPPF (2019) para 8.

12.2 To protect and manage the environment the Councils will employ a hierarchical approach of avoidance, mitigation and compensation.

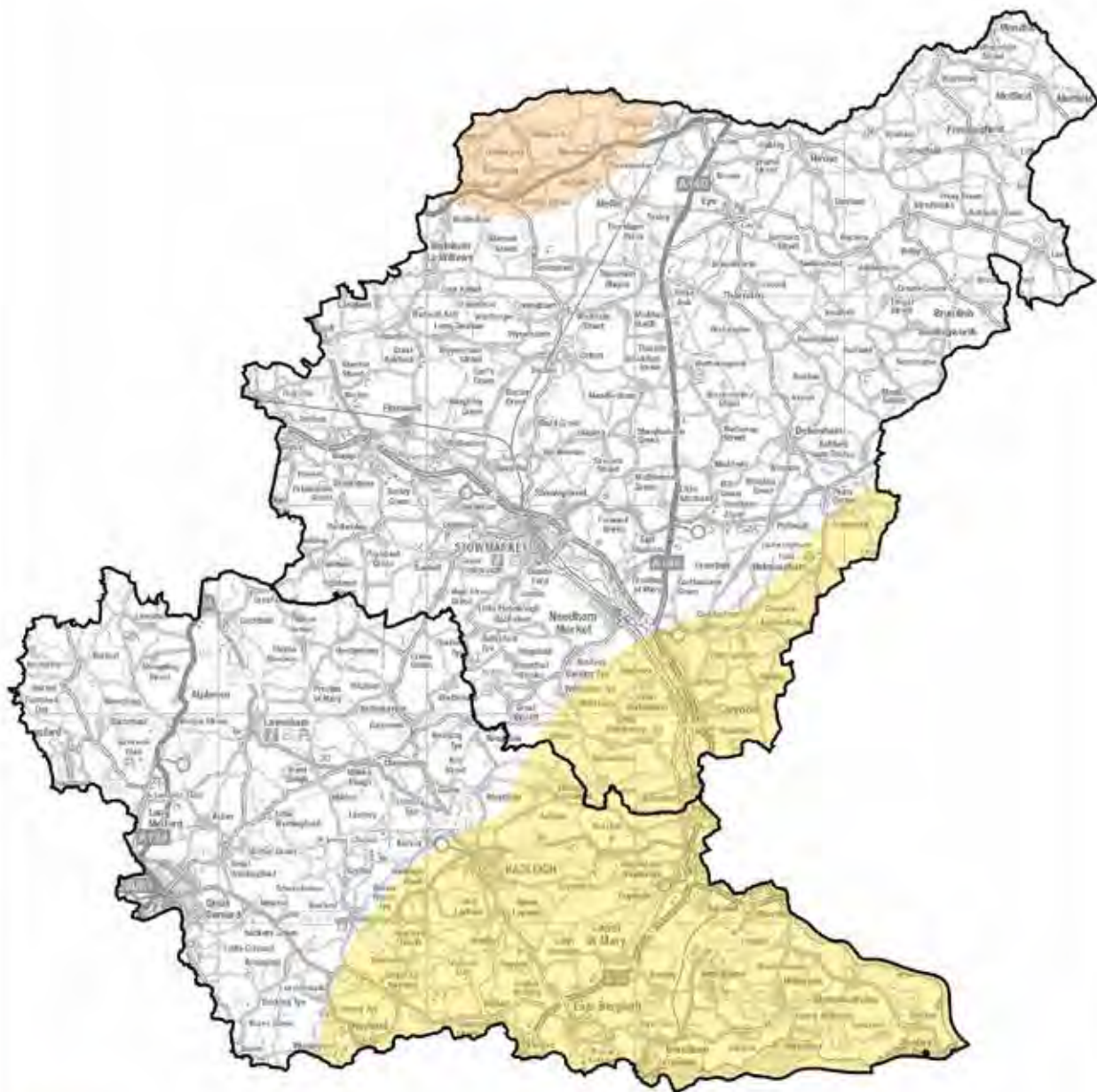
12.3 The NPPF advocates that local plans should contribute to and enhance the natural and local environment (NPPF para.170). A framework of policies supports this strategic approach:

- a. Environmental Protection
- b. Biodiversity
- c. Landscape
- d. Historic Environment
- e. Change of use of Land

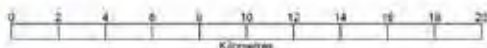
CROSS BOUNDARY MITIGATION FOR PROTECTED HABITATS SITES

12.4 Protection for internationally and nationally protected sites is established in legislation. In producing the Plan consideration can be given to the level of protection to afford to local sites of biodiversity and geodiversity value including County Wildlife Sites, County Geodiversity Sites and priority habitats and species.

12.5 Through previous Habitats Regulations Assessments there has been recognition of the sensitivity of the internationally protected Habitat Sites and the potential for significant effects arising from increased recreational disturbance related to new housing development. Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney Councils (now East Suffolk Council) are taking a joined-up approach to mitigating these impacts. For Babergh and Mid Suffolk these relate to the Stour and Orwell and Deben estuaries. The Councils are currently producing a Recreational disturbance Avoidance and Mitigation Strategy (RAMS) which will identify and cost the measures necessary to mitigate recreational and leisure impacts and confirm how they will be funded. The intention of the strategy is to avoid adverse effects on the integrity of the Habitats Sites in combination with other plans and projects, over the lifetime of the Local Plan.



- Waveney & Little Ouse Valley Fens Special Area of Conservation and Redgrave and South Lopham Fen Ramsar 5km Zone of Influence
- RAMS 13km Zone of Influence



Protected Habitats Mitigation Zones



BABERGH & MID SUFFOLK DISTRICT COUNCILS
 Endeavour House, 8 Russell Rd, Ipswich, IP1 2BX
 Telephone - 0300 123 4000
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- 12.6 To the north and north west of the Plan area there are other internationally designated sites in Mid Suffolk as well as in neighbouring authorities. Proposals for development will need to give consideration to these designations particularly where they are identified within the relevant Impact Risk Zones and Protected Habitats Sites Mitigation Zone.
- 12.7 Development that fall within the Impact Risk Zones for Redgrave & Lopham Fens SAC & Ramsar and Waveney & Lt Ouse Valley Fens SAC will trigger consultation with Natural England.
- 12.8 The Councils will continue to work with other authorities throughout the Local Plan period to ensure that the Protected Habitats Sites Mitigation Zone, strategy and mitigation measures are kept under review in partnership with Natural England and other stakeholders.

Preferred approach

Policy SP09 - Cross-boundary mitigation of effects on Protected Habitats Sites

Development that creates new dwelling(s) within the identified Protected Habitats Sites Mitigation Zone will need to consider impacts. Where relevant, development will be required to make appropriate contributions through S106 agreements towards management projects and/or monitoring of visitor pressure and urban effects on Habitats Sites and be compliant with the HRA Recreational disturbance and Avoidance Mitigation Strategy.

Discounted alternative policies

12.9 No alternative strategic options are considered reasonable. The alternative would be not putting a strategic approach in place however RAMS policy approach is a far more efficient and coordinated option approach to the problem. The approach is based upon evidence, is considered in accordance with NPPF to support cross boundary mitigation.

Climate Change

12.10 The Joint Local Plan aims to future proof all development from the impact of climate change by supporting the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change is a national core planning principle which should underpin both plan-making and decision-taking (NPPF Para. 20). The Joint

Local Plan seeks to meet these aims through the following Climate Change policies:

- a. Sustainable Construction and Design
- b. Design and Residential Amenity
- c. Energy Sources, Storage and Distribution,
- d. Flood Risk
- e. Sustainable Drainage Systems (SuDS).

12.11 Mitigation means to reduce or delay the impact of climate change by reducing the flow of greenhouse gases into the atmosphere, either by reducing the burning of fossil fuels or enhancing stores that accumulate and store gases such as oceans, forests and soil. Adaption means to adapt life in a changing climate with the goal to reduce our vulnerability to harmful effects of climate change.

Proposed approach

Policy SP10 - Climate Change

The Councils will:

- a. **Require all major developments to take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes and visual impacts, and the risk of extreme winter and summer temperatures; overheating from rising temperatures;**
- b. **Require a sequential risk-based approach taking into account future-proofing measures for impacts of climate change;**
- c. **Encourage and support innovative and proactive approaches to design and opportunities to deliver decentralised energy systems powered by a renewable or low carbon source and associated infrastructure, including community-led initiatives;**
- d. **Encourage and support new development that reduces waste and uses existing resources.**

Discounted alternative policies

12.12 No alternative options are considered reasonable. In order to future proof development and the two districts it was decided to consolidate a strategic approach to support development management policies. Addressing climate change is considered a key sustainability matter and the policy requires appropriate measures to be implemented to make growth resilient to local impacts of climate change. No reasonable alternative policy has been identified at this stage.