

## BABERGH DISTRICT COUNCIL

<b>From: Head of Natural and Built Environment</b>	<b>Report Number: L55</b>
<b>To: Strategy Committee</b>	<b>Date of meeting: 18 August 2011</b>

### **BABERGH DEVELOPMENT FRAMEWORK – SUBMISSION DRAFT CORE STRATEGY DOCUMENT (2011 - 2031)**

#### **1. Purpose of Report**

- 1.1 To seek Member approval for a Submission Draft Core Strategy new (local) plan document, and for this to go out to a full public consultation exercise later in 2011. The report describes the stage we have now reached in preparing this new Plan and how it has been shaped by evidence, consultation feedback, the views and inputs of key organisations and independent (sustainability) appraisal. It also advises of the suggested process and sequence of events (especially Member involvement) leading from here, ideally to a relatively early adoption of the Core Strategy. Outline ideas for public consultation arrangements and events are also provided.

#### **2. Recommendations**

- 2.1 That the proposed Submission Draft Core Strategy document, attached as Appendix (a), be approved for public consultation.
- 2.2 That the Head of Natural and Built Environment be authorised to make any revisions to the Draft Core Strategy prior to consultation, subject to the revisions not altering the fundamental substance or intent of the Strategy.
- 2.3 That the arrangements for public consultation in Appendix (b) be noted.

The Committee is asked to make recommendations to Full Council on the above matters.

#### **3. Financial Implications**

- 3.1 These fall into several areas of consideration and span both costs and rewards / incentives. Firstly, independent scrutiny of this Plan (by the Planning Inspectorate) carries cost implications of perhaps £30,000 - £40,000. Officers have sought to address this through timing of the examination (and payment of the fees) to span the 2 financial years of 2011-12 and 2012-3. To meet that aim, timely progress needs to be made now. There may be costs that arise through the need to employ a dedicated 'Programme Officer' to co-ordinate the Plan's external scrutiny stage, although it may be possible to use a suitably trained, redeployed person from within BDC / MSDC for this role. The agreement of a new Plan for the District will also be Babergh's best means of minimising uncertainty leading to the risk of planning appeals, together with their often considerable costs and heavy demand on staff resources, particularly in the case of major appeals.

3.2 Incentives and rewards include the Government's New Homes Bonus (NHB) scheme, which is already in operation. Whilst its long-term future could not be taken for granted, planning for future housing delivery will be necessary in order to promote local benefits from this new system of local financial rewards. This fund is not ring-fenced and a range of decisions is possible on its use. Equally, securing developer contributions to fund infrastructure provision, affordable housing etc. (through legal agreements currently and mainly via Community Infrastructure Levy (CIL) in future) relies on having an adopted Plan in place. The Council Tax base and Business Rates base will also be influenced substantially by the ability to plan ahead through a new district Plan. Finally, the Council's ability to attract external funding, such as funds for better Broadband or EU funding (albeit in an austere financial environment) also requires planning ahead and agreed developments and projects that are ready to proceed.

#### 4. Risk Management

4.1 This report is most closely linked with the Council's Corporate / Significant Business Risk No.s: 1 – Political and Managerial Leadership; 2 - Efficiencies and Savings; 4 - Capacity. Key risks are set out below:

Risk Description	Likelihood	Impact	Mitigation Measures
Failure to put in place new planning framework for Babergh / loss of local control over major planning & development decisions	High	Marginal / Critical	Substantial consultation and engagement has already been built in early on to promote maximum consensus.
Financial controls, safeguards and benefits lost (see section 3)	Significant	Critical	Agree Plan for consultation and allow for progress towards adoption. Scope for later revision
Low level of skilled staff resources occupied by Plan preparation for years and therefore precluded from work to deliver other BDC identified planning / initiatives	High	Marginal	Agree Plan for consultation, allow for progress towards adoption in a timely way. Scope for revision subsequently

#### 5. Consultations

5.1 These have taken place over several years and may be summarised as follows:

- Internal joint officer work and consultations with those responsible for other service areas

- Series of Member engagement exercises, including seminars; verbal briefings / discussions; briefing notes and similar; political leaders group discussions; Strategy Committee and Council meetings
- Ongoing attendance at meetings of the 2 Local Strategic Partnerships and discussions / consultations with these
- Several early, joint working / informal consultations exercises with local authorities, other agencies (such as Environment Agency, Highways Agency, Anglian Water, etc.)
- Early informal (non statutory, 'Issues & Options') stage, public consultation exercise, Spring 2009
- Attendance at Babergh Annual Parish Councils evening events over several years and at Babergh Business Evening
- Growth Review and Planning public consultation exercise, Autumn 2010
- Work with external experts in formulating and refining evidence base and external sustainability appraisal of Plan proposals at each evolving stage

5.2 Outcomes of the most recent consultation, the Growth Review and Planning exercise (together with a Babergh profile, parish information, parish council responses remain on the intranet to view under the [Babergh Development Framework \(BDF\)](#) section). Paragraph 8.2 (below) also covers this matter. Also a range of related consultation feedback is available on the intranet under the Councillor References section, under [BDF Core Strategy Draft 2011/07 \(Members Only\)](#). A full, paper version, statement of consultation to date will also be available in the Members room and placed on the intranet in advance of this meeting for Members' inspection at their own leisure.

5.3 An outline of planned public consultation arrangements is attached at Appendix (b) for Members' information. This has regard to Babergh's Statement of Community Involvement (see <http://www.babergh.gov.uk/Babergh/Home/Planning+and+Building+Control/Local+Development+Framework/Statement+of+Community+Involvement.htm>) adopted in late 2006.

5.4 Public consultation and engagement arrangements have been planned specifically to maximise opportunities for as widespread and as meaningful involvement as possible. It is also important to draw attention to and uphold some important principles. These concern fairness, equality of treatment for all and consistency of approach. There is a need to ensure that the demands, expectations or interests of any one individual or organisation do not preclude or impinge on those of others. Types of interests vary between residents, landowners, developers / builders, the business community, workers (including many from outside Babergh), service providers, visitors and others with an interest in the Babergh area or its communities. The eventual agreed Plan needs to reflect and carefully balance all these varying interests.

5.5 In order to manage expectations, a standard protocol will be maintained, which is in line with that used for planning applications. As such it will not be possible to discuss the merits of objections with those making representations (in person or by telephone) or answer correspondence, in view of the volume received. All written correspondence will be held, its content considered (by issue, rather than small-scale detail) and made available for the Inspector to see in full when the examination stage is reached (see <http://www.planningportal.gov.uk/planning/planningsystem/localplans> for external guidance on this).

## **6. Equality and Diversity Impact**

6.1 The proposed consultation document strategy has been screened to assess whether a full Equalities Impact Assessment (EqIA) is required in view of the 4 identified criteria. This concluded that a full EqIA is not required because although there may conceivably be potential to discriminate once the BDF progresses to a much more advanced and specific stage, the current document is broad-brush and strategic in nature. Its high-level policies, such as those on housing provision, require that all identified needs are met, thus catering for all generic and specific requirements, without any 'preference' for any one group over any other. Further, many planning related requirements now, such as design of buildings and provision for those with mobility impairments, are now standard requirements of other control regimes, such as building control regulations in particular.

## **7. Shared Service / Partnership Implications**

7.1 Most of the BDF evidence base has been prepared (and often paid for) jointly with other local authorities and in some cases provided / paid for by other organisations. It is also necessary for this Plan to have regard to the forthcoming 'Duty to Co-operate' (a feature of both the Localism Bill and draft National Planning Policy Framework (NPPF)). These requirements and cross-boundary / strategic planning considerations have been taken into account and addressed both in the preparation process of the document and in its actual proposed approach and strategy. Recent experience in supporting Ipswich Borough Council at its external examination for its draft Core Strategy demonstrated the importance and practical effect of these requirements. On this, the nature of the requirement appears likely to be rigorous in nature in terms of how it is addressed and evidence of joint working to be shown. However, in co-ordinated and strategic planning terms, this makes a lot of sense and Plans clearly need to pay full regard to those of adjacent local authorities.

7.2 The situation with Mid Suffolk is that MSDC already has an adopted Core Strategy in place (2008) and therefore the centre piece of its planning jigsaw is secured. This benefit critically needs to also apply for Babergh. After that has been achieved (and a significant time investment has already been made towards this end, with much progress made) then the scope and rationale for joint / co-ordinated planning documents will become greater. In the meantime, care is taken to try and ensure that the approach we develop here will be as suitable as possible for use in Mid Suffolk as well (although we cannot seek MSDC Members' views and cannot preempt or restrict any decisions or choices MSDC may wish to make). Vital work that can only follow an adopted Core Strategy (another major reason for Babergh to move forwards promptly) includes development of a CIL system to lever in the funds needed to deliver infrastructure. This will be done jointly with MSDC.

## **8. Key Information**

### **The need for an up-to-date, new Babergh Plan**

- 8.1 Producing a new district-wide Plan for the area's effective future planning is a statutory function and requirement. Beyond this basic point, both 'carrot and stick' factors are helpful to consider. The retention of as much local control over decision making in planning – particularly over major choices and decisions – is important and may be eroded or lost without an agreed Plan in place. As time goes on, this risk would become increasingly likely and more problematic. With current national planning changes, this situation could possibly start to arise as early as April 2012. Another impact is the difficulty, or near impossibility, of effective planning and delivery of infrastructure in the absence of a long-term planning framework. This, of course, can have an influence on quality of life in Babergh. In terms of the new Community Infrastructure Levy (CIL) system, a deadline of April 2014 applies to have such a system in place. This could be expected to take at least 2 years to develop and finalise and that can only be done after a Core Strategy has been adopted for the district. At the same time, whilst the question of meeting development needs may pose thorny issues, planning ahead to deliver new jobs and affordable, plus other, housing needs, is necessary as part of delivering Babergh's agreed priority themes and outcomes in its Strategic Plan for 2008-18.

### **The current stage and summary of progress to date**

- 8.2 Work to develop a Core Strategy for Babergh has been ongoing for around 3 years now. Considerable work was invested to build the right foundations through a solid evidence base. The milestone stages started in early 2009, when a public consultation exercise was carried out on a non-statutory early, 'Issues & Options' report, to help inform subsequent decisions on preferred / proposed option choices. A draft Core Strategy (suggesting preferred / proposed options) was approved to proceed to full Council, for public consultation, by Members (through Strategy Committee) in May 2010. Full Council opted to defer formal consideration of the draft Core Strategy in June 2010, in view of the (then) new Government's planning reforms and intended scrapping of regional Plans in particular.
- 8.3 When some clarification was received an appropriate course of action in response was planned promptly. A decision to review the draft Plan, particularly issues around future growth, was agreed (by Strategy Committee at end of July 2010 and by Council at end of August 2010). A growth issues (and alternative possible growth scenarios) document was then issued for public consultation, carried out from October – November 2010. This targeted Babergh's parish and town councils in particular, as local community representatives and conduits of communication for our many communities. Publicity well in advance was given for a well supported engagement process, helped by provision of a substantial body of local evidence base information for the parish councils. A series of 4 structured, engagement and discussion events was held across the district, supported by planning and other staff responsible for other service areas, from district councils across Suffolk and from the county council. These were well attended, including considerable representation and participation from Babergh's own members. Debate was lively, reflecting high levels of interest and a substantial body of consultation feedback was received in response.

- 8.4 This proved a successful and extremely valuable exercise and has been highly influential in shaping the Submission Draft Core Strategy document that is now placed before Members for their consideration.

### **Conformity, Localism / Local Autonomy & Local Distinctiveness**

- 8.5 Members could be expected to ask a question of whether the starting point is effectively a 'blank canvas'. The position on local autonomy over the room for independent decisions is quite complex and requires careful explanation. Firstly, the regional East of England Plan (or RSS, 2008), despite having been revoked last year (by the Secretary of State for Communities and Local Government) is now back in force and represents part of the Development Plan. The requirement is currently that any statutory Development Plan that Babergh produces must be in general conformity with this. Whilst there seems a good prospect that the RSS will be revoked next year (through the Localism Bill) case law shows that this intention may be a material consideration at this time, yet the statutory Development Plan, for these purposes, remains of great importance to the content of Babergh's Plans.
- 8.6 Whether the RSS is eventually revoked or not, there is a raft of existing national planning policy to which there is a duty to have regard. This is currently being reformed by the draft National Planning Policy Framework (NPPF) (<http://www.communities.gov.uk/publications/planningandbuilding/draftframework>). This has only very recently been issued for consultation purposes (on 25 July 2011; consultation closing in mid October 2011). A careful assessment of this has been made and conclusions reached are as follows:
- A. Despite the much vaunted advent of Localism and emphasis on local control over planning and development decisions, in its current form, the NPPF appears to represent a considerable straightjacket, likely to serve to constrict local scope for entirely locally determined, new plans free of external (centralised) influence
  - B. In particular, the degree of control it currently sets out is that all new local Development Plans (whatever they are to be called in future) *must conform to* the NPPF and, in particular, its central tenet: The 'Presumption in favour of Sustainable Development'
  - C. The NPPF and its policies need to be taken to represent the government's approach to Sustainable Development as a collective whole but critically, 'should be interpreted and applied locally to meet local aspirations'. It is this point that describes Babergh's scope for setting out its stall very clearly on local distinctiveness and that describes the nature of the task before the Council to determine and to articulate in the best way possible. It is vital that Babergh gets these points right

- D. The planning system is also to remain an evidence based one, relying upon (gathering, interpretation and appropriate application of) up-to-date and relevant evidence. The evidence base should be 'proportionate' in nature. Although some may find this frustrating, planning is predominantly a legally bound discipline and like the operation of the legal system, evidence is necessary to ensure objectivity and rationality. This feature, therefore, is considered beneficial overall. In addition, evidence of local circumstances is necessary in the above-mentioned, local interpretation and application to meet local aspirations
- E. The assessment made concluded that the overall approach and direction of the draft Core Strategy is not substantially out of kilter with that of the draft NPPF and that with some suitable, relatively minor, adjustments and clarifications that have already been drafted and incorporated, there is no need to radically revisit the intended approach and content. However, officers advise that it will, of course, be vital to keep abreast of, and respond effectively to, such changes in the planning field over time. Equally, attention will be given to ensure an approach that meets the requirements of the time, including conformity as / where necessary and a clearly reasoned and justified approach if otherwise, based upon evidential, local distinctiveness. In such ways, it has to be remembered that passing the Government's external scrutiny tests (of 'Soundness', etc.) must not be under-estimated and may serve to restrict some choices or actions
- F. Of particular relevance are the messages that:
- The system, whilst being reformed, remains 'genuinely plan-led' ('with succinct local plans setting out a positive, long-term vision for an area')
  - Accordingly, plan-making and putting agreed local plans in place as soon as possible remains of the utmost importance
  - The Growth Agenda remains on but as suggested above, it is necessary to define what this means for Babergh in practical, local terms and arrive at an appropriate, local response

## **Conclusion**

- G. Although the NPPF is currently being prepared, Babergh's best interests would be served by continuing to plan ahead with a local plan and to retain as much local control as possible, with a locally agreed interpretation and means of applying the external planning constraints or 'shackles', such as may exist at the time
- 8.7 There may be a need to give further consideration to the draft NPPF (possibly jointly with MSDC – if that is of benefit). Meanwhile, for immediate and most pressing purposes, the above analysis and responses are considered sufficient.

## **Proposed Way Forward and Provisional Timetable**

- 8.8 The Submission Draft Core Strategy has followed a logical and progressive plan preparation process and builds from the issues identified early on and the range of potential options available to address them (as identified in early 2009 and as reviewed in late 2010). Considerable ‘front loading’ of early engagement and consultation has been invested. The idea behind this approach is that once the major issues have been identified, considered and debated, this ought to allow for quick progress in completing a proposed Plan after much of the hard work has been done earlier on. Accordingly, and to meet the relevant planning regulations, this draft Plan has been prepared as a draft that is believed to be essentially fit for submission to Government for external examination, hence the proposed Submission Draft document title. That said, the task at hand is of course to test whether Members are satisfied with its broad approach and content and if so, to test whether the wider communities consider that the overall Plan, taken together as a whole, reflects the direction of previous engagement and represents an appropriate way forward in the future strategy and planning of the district for the next 20 years.
- 8.9 Following the public consultation period, the intention is to report back to Members on the nature of issues and responses raised and overall recommendations on whether, or how far, the draft plan ought to be revisited in response. This will be scheduled for early 2012 (with meetings in February looking to be at the right time). If substantial changes are in order, further consideration of appropriate changes in response, research work, appraisal, testing, Member engagement / approvals and re-consultation would be necessary. If only relatively minor revisions prove appropriate, then the draft Plan would be ready to submit for examination, where those remaining at odds with it have a right for any outstanding issues / objections to be explored through a hearing or the use of written evidence submissions, according to preference, requirement and nature of issues at hand. The timing of examination hearings would depend partly on the scale and nature of issues to be explored and would be determined by the Planning Inspectorate.
- 8.10 It is not the role of this covering report to provide the content of the Submission Draft Core Strategy, beyond highlighting its broad approach and features. These latter elements are summarised and commented on briefly in ensuing paragraphs.

## **Approach and Main Features of the Plan and Babergh’s Priority Themes**

- 8.11 The basis of the Plan must be promoting / ensuring sustainable development. That is a given but the key to this is refining what that means in practice for Babergh. Whilst this is far from an easy task, the draft Plan seeks to explain and articulate the Babergh interpretation and approach on this. With due deference to the social / community and environmental elements of sustainability, circumstances point to the need for a jobs and economic led Plan (reflecting a *strong and sustainable Babergh economy*). This is also because the Plan has to provide a positive steer for (managed) change, whereas a Plan based only on maintaining the status quo, would have very limited value and, it is considered, would not serve Babergh well in future. Evidence also suggests that a valuable opportunity exists to aspire and aim for ambitious economic growth, with an *indicative* level of 9,700 new jobs targeted from 2011 – 2031. This would bring real benefits, but its achievement will be demanding and will require a carefully planned strategy, commitment and concerted actions. A new economic strategy (in 2 parts) to support these aims is already well progressed.

This is being developed jointly with MSDC and Members will be asked to consider and approve that strategy in coming months.

- 8.12 The Submission Draft Core Strategy contains specific strategies and policies for each town and for the rural areas. The town centres receive particular attention, with an approach tailored to each, according to its own circumstances and needs. Support for village facilities and services remains a major policy objective.
- 8.13 The Plan proposes big changes in relation to new homes and affordable homes. Vitaly, the contention is that the approach is not about simplistic housing numbers, since addressing Babergh's issues through a volume based solution is not appropriate. It is considered that a growth figure close to that of the adopted RSS is supported by the evidence considered, that this is not a high volume approach, and provides an appropriate balance for Babergh between growth and restraint. This means that the emphasis rests instead on ensuring that the right kind of homes are provided in relation to identified needs and the Plan reflects this aim. It is considered that the aspiration / expectation should remain for 35% of new homes to be affordable but a series of carefully targeted measures is proposed to maximize chances to achieve this in difficult circumstances, certainly for the early part of the 20-year Plan period. Babergh is currently near the middle of its current 500 new affordable homes programme period (from 2009-2014). With an allowance for providing approximately 300 overall new homes per year, a figure of 100 new affordable homes per year, would serve the district well. All these proposals have been devised to ensure that Babergh can deliver on its theme of *Quality homes that local people can afford*.
- 8.14 The distribution of planned growth has been radically changed. Whilst options for Babergh are relatively limited, the urban areas will need to accommodate some growth between them, but primarily on the basis of comprehensive masterplanned new strategic developments. For homes growth, the planned, new, urban-rural division is suggested to be 60% of growth across the urban areas and 40% across the rural areas. Planning for new homes and for all purposes in the rural areas will be approached through a newly devised strategy based upon the principle of 'functional clusters' - groups of villages sharing common links and centred on a main (usually larger) village centre. This has been formulated to provide a basis for co-ordinated, interchangeable, planning, and flexibility of approach. This approach will be integrated with a continuing positive emphasis on the rural economy and encouragement of rural jobs growth. The improvement of Broadband and other communications technology is recognised as vital in this aim and in promoting home-working and every effort is being made to support this specific initiative as one of the most beneficial interventions that can be made.
- 8.15 It is recognised that although there is often an on the surface appearance of rural affluence and well-being, this can mask a number of specific disadvantages and issues that need tackling and Babergh's rural areas are under pressure. By providing greater flexibility for Babergh's villages to plan for some future growth, it is intended to sustain and support the existing pattern of many distinct but linked rural communities and their vitality, reflecting Babergh's theme of *Vibrant Places and Strong Communities*.

- 8.16 The quality of the natural environment including landscapes, natural features, ecology and their value is recognised in the Plan. Although the emphasis is traditionally on protecting these assets, a basic strategy is provided to seek to provide for enhancements wherever possible. An important part of this is the considerable work done on preparing a green infrastructure strategy for the whole district. This links with the document's attention to broader climate change issues and the drive to cut carbon emissions. Whilst there are important constraints that are likely to serve to limit the potential in Babergh for large scale renewable energy generation in particular, a range of other more localised and smaller scale / community based, measures is preferred. A broad strategy has also been devised in relation to protecting and promoting Babergh's rich historic environment. Further detail on these matters will be provided in later BDF plan documents. These areas of the Plan reflect the *Greener and cleaner Babergh* priority theme.
- 8.17 Finally, the document has been prepared with a view to planning for infrastructure provision alongside its development. This has been progressed as far as it can in advance of a finalised spatial strategy and the relevant material is set out at the end of the document. An adopted Core Strategy will make the position much clearer as to what the scale, pattern and location of future development is to be (along with subsequent, more detailed document(s)) and allow for detailed and specific infrastructure improvements to be planned for, according to what is required as a result of growth. That will be taken forward mostly through a new CIL regime and this new system may represent a useful means of providing future infrastructure compared to the previous arrangements.

### **Alternatives**

- 8.18 In 2010, as part of more detailed work to plan ahead for site specific planning matters, an invitation was issued for landowners, developers, etc. to submit site specific locations or outline development proposals. This was necessary to develop the evidence base and to allow more clarity on how broad directions of growth for the urban areas could be taken forward. For current purposes, it is not necessary to cover details of the many site proposals suggested, most of which were to accommodate growth at relatively modest scale in locations throughout the district.
- 8.19 However, in response, 2 submissions were received representing related but alternative proposals for major new development, allowing for both employment growth and delivery of new homes. Either proposal is cited that it could be regarded as of not just a district-wide scale / importance but also, potentially of a regional or even national level of importance. In terms of meeting the scale of needs that is envisaged by the current regional Plan and this draft Core Strategy, the amount of land involved would be sufficient to meet most or possibly all of the suggested new homes growth and a range between most or more than all of the suggested level of jobs growth. Although very little clarity is available on the scale of housing growth sought, the larger of the 2 ideas indicates that it could provide for over 15,000 new jobs.

- 8.20 The alternative then that the proponents of these proposals wish Members to consider is of a development of the scale of a small, virtually free-standing, new town. Clearly, it would offer a potentially alternative approach to Babergh's growth and development strategy – and in that way could be regarded as relieving growth pressure on other locations. A question then arises as to whether this approach would be seen as meeting all (or most) of the growth needs of Babergh in one location and whether that would be desirable or not. Otherwise, it could conceivably be approached as a development that meets some or most of Babergh's growth needs but with much or all of its rationale being concerned with meeting wider (regional or national) growth needs, at a location that happens to be within Babergh. As such there are 2 different ways of looking at these proposals but they are not mutually exclusive.
- 8.21 One of the 2 alternative propositions envisages creation of a new 'Dryport' facility, to be developed to provide an intermodal, freight transport interchange, with the specific aim of switching freight (especially containers) from road to rail. This location includes land adjacent to the Ipswich-London mainline railway and would be near the A14 / A12 intersection, thus allowing the potential for such a facility. A Dryport facility is envisaged as being supportive of the complex of Haven Gateway ports (Felixstowe, Ipswich, Mistley and Harwich) and their sustainable growth.

### **Assessment of Alternatives**

- 8.22 The early stage 'Issues & Options' report exercise in early 2009 floated a range of 5 different ways to accommodate the district's growth in future, with approaches spanning the range from more dispersed distributions through to the idea of a single, new settlement approach (Option 5). The new settlement approach was one of the 2 least favoured options among the responses received. In addition, the sustainability appraisal carried out also identified this as the approach with most negative results. Members of Strategy Committee at its meeting on 13 May 2010 (see Paper K16: <http://www.babergh.gov.uk/NR/rdonlyres/3FF58AE6-F375-42CD-892D-92A72F95D174/0/K016.pdf>) gave some consideration to the suggestion of accommodating the district's future growth through a new settlement approach and it received some discussion but was not generally supported or taken forwards. Officers would point out that in terms of changes of circumstances since then, there was no actual proposal for them to consider at that time, nor one that was specific in locational or other terms (such as scale, form, etc.), so it was considered purely on a conceptual / theoretical basis. It is for Members now to come to a view as to whether any of those changes in circumstances are of a nature that may now make them wish to reconsider such an approach.
- 8.23 Babergh and the Haven Gateway Partnership have worked together as partners in the European Dryport project since 2008 ([www.Dryport.org](http://www.Dryport.org)) with this idea being explored and indicating the potential benefits of a Dryport facility to serve the Haven ports and Felixstowe port in particular. Whilst the merits of creating a Dryport facility to serve the Haven ports (wherever that should or could be located) are accepted in principle, the issue becomes rather more complex to consider if it is tied with proposals for substantial residential development that may represent the overall development strategy for Babergh. If that is not considered to be the case, then a reasoned justification with appropriate evidence for a regional or national type facility to be located here (as with anywhere else) is necessary.

8.24 In either case, the necessary body of solid, supportive evidence, together with consideration of potential alternative options (in line with the planning approach followed for this Core Strategy) is absent. On that basis, officers cannot support or recommend that Members pursue this idea as an alternative to the approach that has been formulated for Babergh over the course of time. Equally, whether such an alternative has substantial merits or not, no case of overriding weight is evident on which to justify delaying further and risking the establishment of a new Plan for Babergh in a timely way, particularly given the very complex nature of making any form of tangible progress on such an approach, as experience in other parts of the country (such as Cambridgeshire) has clearly shown.

## 9. Appendices

Title	Location
(a) Submission Draft Core Strategy Plan document (Strategy Committee 18/08/2011 version)	Attached/available on the website
(b) Outline of public consultation arrangements	Attached
(c) Proposals Map – Key diagram	Attached

## 10. Background Documents

### 10.1 Draft National Planning Policy Framework (NPPF)

Authorship:  
 Rich Cooke  
 Planning Policy Manager

Tel. 01473 825775  
 Email: [ldf@babergh.gov.uk](mailto:ldf@babergh.gov.uk) or  
[rich.cooke@babergh.gov.uk](mailto:rich.cooke@babergh.gov.uk)

**Appendix a**

**DRAFT**

**Babergh Development Framework (2011-31) Core  
Strategy Submission Draft.**

**Strategy Committee Draft - August 2011.**

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# Section 1

## Introduction: Role of the this Core Strategy

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

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

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

The legislation which supports the preparation of the Core Strategy and other policy planning documents is extensive and subject to change. Many such changes are proposed as part of the Localism and Decentralisation Bill currently going through parliament. More information on the current legislation and the potential emerging legislation which relates to the Core Strategy is set out in the supporting Technical Background Context Document.

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

## Structure of the Core Strategy Document

This Core Strategy comprises three sections as follows;

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

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

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

### **Evidence base**

In addition to these technical background documents the Core Strategy draws on an extensive evidence base which can be found at:  
<http://www.babergh.gov.uk/Babergh/Home/Planning+and+Building+Control/Local+Development+Framework/>

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

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

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

### **Key characteristics and issues for the future**

#### **Environmental characteristics**

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

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

## Map 1 to illustrate

### To show;-

- SPA / Ramsar
- AONBs
- SSSIs
- NNR
- LNR
- RIGs
- Historic parks and gardens

### FACTS

4000 LBs  
28 con  
areas  
1000+ arch  
sites  
34 sch an  
mons  
231 county  
WS  
18 SSSIs  
etc

## Key Environmental Issues

- Some parts of the district are at risk from flooding, especially along the river valleys and estuaries. It is important that this risk to lives and property is not increased and that any impacts are managed and mitigated.
- There is a need to reduce the amount of waste going to landfill as space rapidly runs out in Suffolk and other parts of the region. Babergh recycled almost 30% dry household waste during 2008-09.
- CO2 levels of emissions in the Babergh District are above regional and national averages<sup>1</sup> and this part of East Anglia is particularly vulnerable to the effects of climate change. It is therefore important that we look at ways to contribute to reducing climate change in the district including more sustainable energy generation and energy use / conservation.
- Traffic congestion, and air pollution due to traffic are also important issues in some parts of the district. The potential pollution hotspots relate to the A12 and A14 trunk roads and the A131 southern approach to Sudbury, which carry relatively high volumes of fast-flowing traffic. The Ballingdon Street, Cross Street and Church Street area of Sudbury has been designated an Air Quality Management Area (AQMA) as a consequence of traffic congestion and air pollution.
- Adequacy of infrastructure, in terms of its extent and coverage, capacity, condition/state of repair etc.
- Development close to protected areas may have negative impacts such as disturbance and decline of protected wildlife, changing a cherished view, or creating congestion that affects both residents and visitors. It is important to strike a balance between the need for new jobs and homes and protecting the most important habitats, views and buildings for the future.

<sup>1</sup> Suffolk County Council, 2008

## Economic characteristics

Babergh District has a diverse economy with a strong manufacturing sector and distribution, hotel and restaurant sector, a declining agricultural base (although this sector makes a larger contribution to the economy than is the case regionally and nationally) and a tourism industry with significant growth potential<sup>2</sup>.

Babergh's local economy is less than half the size of the average for Britain. The district has maintained a low level of unemployment through and since the recession (3% of the economically active population in 2008 - a lower level than for Suffolk, the East of England and the UK). In 2007 Babergh contributed to almost 21% of the jobs in Suffolk<sup>3</sup>. The average gross earnings in Babergh are below the Suffolk average (£32 per week less in 2008) and well below the national average (£144 a week less in 2008). Data from the 2001 Census showed that 43% of the workforce in Babergh travel outside of the district for employment, and that 5% of the workforce in Ipswich Borough, 3% of Mid Suffolk workforce, 2% of the St Edmundsbury workforce and 2% of the Suffolk Coastal workforce travel to Babergh for work.

Fig 1

**Insert Pie chart to show:**

In 2007 73% of the Babergh workforce were employed in the service sector, 24% in manufacturing and construction and 3% in agriculture.

Note under pie chart - The manufacturing sector is notably higher than that in Suffolk. The District has smaller than usual numbers of people working in the Transport & Communications and Public Administration, Health & Education sectors<sup>4</sup>.

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

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

<sup>2</sup> GVA Grimley, Employment Land Review, 2010

<sup>3</sup> Suffolk County Council, 2008

<sup>4</sup> Annual Business Inquiry, 2008 and GVA Grimley, Employment Land Review, 2010

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

**Map 2 to show** Distribution of employment sectors throughout the district- indicative of comparative scale of sectors by location

### Issues for the local economy

- Promoting the drivers of our local economy and our existing strengths, and identifying the potential for future new businesses and employment opportunities in the district. Planning policies cannot create new businesses but they can create a positive environment for business growth and job creation.
- Gaps in the skills and education base - Babergh performs better than the GB average up to and including GCSE Level (NVQ2), but less well at A Level (NVQ3) and above<sup>5</sup>. Many young adults move out of the area seeking higher education, higher paid employment and, sometimes, housing opportunities.
- The number of Job Seekers Allowances has risen significantly in the district between 2007 and 2010<sup>6</sup> reflecting the difficulties experienced as a result of the economic recession in the country.
- Income levels and salaries / wages do not compare favourably with other areas overall.
- Babergh together with Mid Suffolk have the largest proportion of outward commuting workforce in Suffolk<sup>7</sup>.
- Communications need improvement, both in physical and electronic terms (including road / rail links and broadband technology, plus mobile telecommunications).

### Demographic and social characteristics

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

Map 3 to show

Demographic and social characteristics including population levels by parish

<sup>5</sup> Suffolk Observatory, 2008

<sup>6</sup> Suffolk Observatory, 2008 and Suffolk County Council, 2008

<sup>7</sup> Suffolk County Council, 2005

Babergh has two main centres of population. The largest settlement is Sudbury and Great Cornard, which had a population of over 20,000 people in 2007. Hadleigh, the second largest town, had a population of over 8,000 in 2007<sup>8</sup>. Babergh's north east edge includes part of the larger urban area of Ipswich. This area, known as the Ipswich Fringe, includes Pinewood, Wherstead, Sproughton and Burstall which together have a population of 6440.

Babergh's population rose by almost 4% over the period 2001-2007. It is predicted that the population will rise by 4.9% between 2001 and 2021 to 87,900<sup>9</sup>. This is lower than the predicted average growth for Suffolk.

A more notable trend is the rate at which the population in the district is ageing, with 19% of the total population older than 65 years in 2001. It is predicted that this figure will increase to 29% of the total population by 2021<sup>10</sup>, and the age pyramid in Fig 2. below illustrates this.

Fig 2. SCC age pyramid graph Babergh 2008

Babergh has 76 parishes with only 20 of these parishes with a population of over a 1000 people in 2007<sup>11</sup>. In 2009 only a small proportion of the 76 parishes had access to most of the key services and facilities to meet their day-to-day needs. These parishes are fairly evenly distributed throughout the district<sup>12</sup>. Local facilities such as shops and post offices are under threat in a number of areas, and villages are under pressure to maintain their viability.

### Key social issues

- Affordability of housing - 2008 figures show that the average house price is almost 10 times higher than the average wage in the area. Babergh is the second least affordable district in the County. Although this average is dropping at present, in real terms many people would still find buying a house unaffordable<sup>13</sup>.
- Need to plan for the growing number of elderly and very elderly people - local health and other services will be placed pressure. It will be important ensure that the needs of the elderly population are addressed.
- Babergh is the second least deprived district in the County (Index of Multiple Deprivation updated 2007). This is relative, and there are pockets of deprivation present around Sudbury. Some of the rural areas of Babergh are particularly deprived in terms of access to housing and other services<sup>14</sup>.

<sup>8</sup> Suffolk County Council mid year population estimates, 2009

<sup>9</sup> Suffolk County Council mid year population estimates, 2009 (based on EERA, 2006)

<sup>10</sup> Housing Needs Survey, 2008 and Suffolk County Council, 2009

<sup>11</sup> Suffolk County Council mid year population estimates, 2009

<sup>12</sup> Babergh District Council, 2009

<sup>13</sup> Suffolk County Council, 2009 (Suffolk Observatory 2008 Q3 House price to Income ratios)

<sup>14</sup> Index of Multiple Deprivation, 2007

- Whilst the incidence of crime is low across the district generally, there are specific locations within town centres and areas of relative deprivation where the incidence of crime is relatively high, and growing. More generally, crime and disorder is still an important issue for many local people, and fear of crime is disproportionate to the levels of crime in the area<sup>15</sup>.

### **People and Places in Babergh**

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

### **What is Babergh like now? What makes it that way? .**

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

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

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

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<sup>15</sup> Suffolk Observatory, 2008 and ONS Annual Population Survey

## **Key Issues for Growth and Change**

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

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

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

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

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

The preferred Babergh approach for this Plan period is to facilitate and plan for managed growth, through an economic growth / jobs-led strategy. As a result, a significant degree of economic growth is being proposed. This is partly in recognition of Babergh's wider context and its opportunities to promote economic prosperity and new job creation. We propose a positive, measured approach that helps to create renewed confidence. Our contribution can only be primarily local in nature but it is aimed towards helping promote national economic recovery. We will adopt a realistic approach and recognise that achieving this target will be challenging. In consequence, an economic strategy has been prepared to explain and support the Core Strategy and to set out the means by which it is to be realized. That supporting strategy also explains in more detail why Babergh is pursuing an ambitious high economic growth approach.

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

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

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

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

## **Spatial Vision:**

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

## **Objectives for shaping Babergh's future:**

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

#### *Critical Success Factors*

- *Delivery of 9700 new jobs and 2500 new homes by 2031 throughout the district supporting urban and rural areas and meeting the needs of businesses and communities*
- *Delivery of a mix of housing types which matches the identified need in each location*

### **Policies CS1; CS2; CS14, CS15; CS16, CS17 and CS18**

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

#### *Critical success factors;*

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

### **Policies, CS2; CS12; CS13; CS3, CS4; CS5; CS6; CS14**

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

#### *Critical Success Factors*

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

### **Policies CS 1; CS 2, CS11, CS12**

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

##### *Critical Success Factors*

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

**Policies- CS3; CS4; CS5; CS6,CS10, CS15, CS16, CS17, CS18**

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

##### *Critical Success Factors*

- *Evidence of schemes which meet the target reduction in CO2 emissions*
- *Brown field sites developed in preference to green field, resulting in a significant amount of development coming forward on brownfield land;*
- *The number of schemes which demonstrate the use of on site renewables and energy saving initiatives, plus renewable energy generation;*
- *The number of schemes implemented that demonstrate the use of innovative and/or resource-saving measures such as SuDs and waste management measures.*

**Policies- CS 7, CS8, CS9, CS10,**

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

##### *Critical success factors*

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

**Policies CS3, CS4, CS5, CS6, CS7, CS10, CS11**

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

##### *Critical Success factors*

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

**Policies CS1, CS6, CS13,CS16, CS17**

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

*Critical success factors*

- *Development within the Strategic sites is phased over the plan period, as outlined in a master plan or other relevant planning delivery framework;*
- *In Sudbury / Great Cornard phasing ensures that development in the Chilton Mixed Use scheme (Committed development in the Adopted Local Plan) comes forward in the early part of the plan period, and if Chilton is delayed allows for the New Direction of Growth to be implemented sooner.*
- *Development in other locations respects the cumulative scale of development elsewhere in the settlement and within the functional cluster*

**Policies- CS3; CS4, CS5, CS6, CS17, CS18**

## **Section 2**

### **Settlement Pattern**

#### **Towns and villages in Babergh**

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

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

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

In order to draw out and understand local knowledge better, a mapping exercise that was carried out in the autumn of 2010 demonstrates the importance of Sudbury, Hadleigh and Ipswich for employment, shopping and services, and the strong function that some larger villages in the district have in supporting the rural hinterland beyond, including many smaller villages, particularly on the Shotley Peninsula and the north west and north east of the district. Map 4 reflects the findings of this exercise and more details to the background can be found in the Spatial Strategy Background Document.

(Insert Map 4- Indicates where people go for key services/ relationship to other settlements)

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

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

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

The information provided by the mapping exercise, from the parish and town councils, demonstrates this concept and the extent to which it informs the settlement pattern of the district is described below. Although the Core Strategy is for the Babergh area, the functional clusters of settlements do not equate to administrative boundaries. Information has therefore been sought from all of the Parish Councils of the settlements adjoining the Babergh District Boundary, and where it has been provided this has informed the cluster groups where relevant. The settlement clusters identified are described below and are shown on **Map 5**. This also illustrates the extent of the connections between settlements and their function within the wider community beyond.

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

Communities close to Sudbury and Hadleigh will use these towns to provide everyday services and facilities, even if they have one or two services of their own. Communities close to Ipswich may depend on the town for primary schools and doctors, and may also use town supermarkets for convenience grocery shopping, and therefore may not appear in any of the 'functional clusters'. The clusters (or immediate catchment areas) associated with the urban areas are illustrated on map 5.

Insert Map 5 – to replace text list below)

- **Sudbury / Great Cornard** - Chilton, Great Waldingfield, Acton, Newton and Little Cornard
- **Hadleigh** – Layham, Semer, Aldham, Whatfield, Elmsett, Kersey, Lindsey, Chattisham & Hintlesham and Burstall

- **Ipswich** – Pinewood, Sproughton, Wherstead, Belstead, Copdock & Washbrook, Chattisham & Hintlesham, and Burstall.

These main urban areas also serve much wider communities for many other needs, including employment, leisure and retail (beyond everyday convenience essentials). The role of the urban areas for the wider needs of communities is reflected in the overall strategy for growth.

### **Functional Clusters (or ‘Catchments’) centred on Core Villages**

In addition to Sudbury, Hadleigh and the Ipswich Fringe area the mapping exercise has identified ten larger, villages that are at the centre, or core, of hinterlands of smaller villages and rural settlements that form ‘functional clusters’. These larger villages have been identified as Core Villages. Evidence shows that many other settlements regularly look to these Core Villages for various day to day essential needs. As such they have been identified as having an important function within the rural area, and for the communities beyond. The Core Villages are shown on the Key diagram. The functional clusters which relate to the Core Villages are shown on Map 5.

Map 5 to replace text list below

- **Bildeston**- Nedging and Naughton, Chelsworth, Lindsey, Monks Eleigh, Kersey, Milden, Kettlebaston, Hitcham, Brettenham, Wattisham and [Battisford and Felsham](#).
- **Boxford**- Groton, Assington, Newton, Little Waldingfield, Edwardstone, Milden, Monks Eleigh, Lindsey, Kersey, Polstead, Stoke by Nayland, Leavenheath, Layham, and Shelley.
- **Capel St Mary**–Raydon, Washbrook & Copdock, Tattingstone, Bentley, Holton St Mary, Great Wenham, and Little Wenham.
- **East Bergholt** - Holton St Mary, Raydon, Layham, Tattingstone, Branham, Stratford St Mary and Higham
- **Holbrook** - Wherstead, Freston, Chelmondiston, Shotley, Stutton, Tattingstone, Erwarton, Woolverstone, and Harkstead.
- **Lavenham** - Cockfield, Thorpe Morieux, Preston St Mary, Great Waldingfield, Little Waldingfield, Alpheton, Milden, Brent Eleigh, and [Felsham](#)
- **Long Melford** - Stanstead, Alpheton, Cockfield, Acton, Great Waldingfield, Boxted, Lawshall, Shimpling, and [Borley and Foxearth / Liston](#).
- **Nayland** - Assington, Leavenheath, Polstead, Stoke-by-Nayland and [Little Horkesley](#)
- **Glemsford**- Somerton, Boxted, Stanstead, Hartest, and [Foxearth and Liston](#)
- **Bures St Mary**- Little Cornard, Assington, [Bures Hamlet](#), [Mount Bures](#), [Alphamstone](#), [Lamarsh and Bulmer](#).

**NB: Villages listed in coloured text are those located outside Babergh district.**

The settlements identified as Core Villages have a role as such, because they provide a number of essential services and facilities to a catchment area of smaller villages and rural settlements. All of the core villages identified have 5 or more settlements looking to them for many everyday convenience needs. Although not a factor in defining a Core Village, it is also the case and no coincidence that all of those listed host some of the key everyday services including a primary school, Doctors Surgery, Convenience shop/ Post office and have access to public transport. Whilst this will of course influence the extent to which villages serve other settlements, the relationship between the Core Villages and the settlements beyond them reflects the connections that people actually living there tend to make. It is clearly evident that this is strongly influenced by the geographical location of the settlements, and in particular the proximity to other larger centres. The evidence which emerged from the parish and town council mapping exercise informed the functional clusters illustrated on Map 5.

### **Hinterland Villages**

A total of 42 hinterland villages have been identified, and all fall within one or more of the functional clusters described. Many of these villages tend to be small, with very limited facilities, so are dependant on nearby larger Core Villages or urban areas for many of their everyday needs.

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

There are more remote settlements in the countryside beyond the Hinterland Villages, and in some cases these hamlets and rural settlements will look to the Hinterland Villages for some of their needs, as well as to the Core Villages and urban areas. Again, this tends to happen in clusters and the pattern is reflected in the functional clusters identified on Map 5.

### **Brantham**

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

brownfield employment area can be found in the adopted Local Plan Policy EM06, and the Council is in discussion with the landowners with a view to developing a Master Plan. The redevelopment and regeneration of this site remains an important planning objective that the Council is committed to working proactively to achieve. Brantham is therefore identified separately from the Core Villages as regeneration project. If a successful redevelopment scheme is achieved for the Brantham industrial area it may lead to a re-assessment of the role that the village plays in the local area.

## **Countryside**

As a rural district much of the area comprises countryside. Everywhere beyond the built up areas of the urban / regeneration areas and core and hinterland villages, defined by settlement development boundaries, is treated as open countryside. This includes some small clusters of houses located remotely from village centres and a few very small rural hamlets. The countryside still hosts some traditional activities which, by their very nature need to be located there. Although, there has been a need for diversification, agriculture, still makes up a very large part of our countryside between the villages, certainly in terms of land use.

## **Growth – how much and where it will go**

### **Background and context for growth in Babergh**

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

Guidance is provided to steer our strategy for growth for the district through national planning policy guidance. The adopted RSS set targets for new homes and jobs for each council area, and whilst the regional strategic level of policy is likely to be revoked the sub-regional context for Babergh remains an important consideration. Babergh works with its neighbours in the Haven Gateway area across the county boundaries of Essex and Suffolk, and with neighbouring authorities in the Ipswich Policy Area.

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

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

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

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

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

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

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

### **From Broad Locations to New Directions of Growth**

We have considered the constraints, advantages and disadvantages of some potential areas around the towns/urban areas - these were the Broad Locations identified in the Growth Issues and Scenarios document in 2010. From these nine areas four have emerged and have been identified as New Directions of Growth. The key diagram shows two New Directions of Growth at Sudbury/Chilton/Great Cornard (identified as Broad Locations 5 and 6 in the Growth Issues and Scenarios document), one at Hadleigh (Broad Location 1), and one in the Babergh <sup>16</sup>Ipswich Fringe (Broad Location 8).

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

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<sup>16</sup> The Ipswich Fringe is located in fairly close proximity to the Stour and Orwell Estuary, and this option also reflects early indications from the Stage 1 Habitats Regulations Assessment process that care should be taken in terms of the percentage of growth allocated for the Ipswich Fringe. Work undertaken strongly indicates that the higher the level of growth at the Ipswich Fringe the more likely it will be to have adverse impacts on the Stour and Orwell Estuary SPA. In addition, the [River] Deben SPA may also be affected by higher levels of growth the Ipswich Fringe.

The New Directions of Growth, the edge of town/urban extensions, have been selected as locations that can be aligned with the capacity of existing infrastructure, or can be planned at a scale that is sufficiently viable to include new or improved infrastructure, and planned to include employment land, green infrastructure, and access to services including transport.

Distribution of growth and development is therefore to be shared between the town centres/urban edges, Brantham and the core and hinterland villages. The amount of housing growth and employment land to be accommodated in core and hinterland villages will depend on their individual capacity to accommodate growth, the scale and character, role and function of the settlement and the views of the local community. It is not appropriate to identify allocation sites or broad locations for potential growth in the villages at this stage, and allocations will be made, if appropriate, in the Site Allocations DPD.

### **Level of Economic Growth**

The adopted RSS (2008) set out in Policy E1 an indicative job growth target of 30,000 jobs for the Suffolk Haven Gateway (defined as Ipswich, Suffolk Coastal and Babergh). This was not apportioned between the districts, so it was for these local authorities to determine an appropriate distribution between them. Whilst having regard to job creation plans and aspirations for our neighbour authorities, we also consider that circumstances have moved on since then. The targets for new jobs set out on a district by district basis in the draft review of the RSS (to 2031) are a little different in nature from the RSS housing growth targets. The indicative jobs target figures in particular were developed by councils working together with neighbours – in this area the Suffolk Haven Gateway authorities – to provide a “bottom up” estimate based on need / capacity and the local economic context<sup>17</sup>. Accordingly, and whilst the Government has indicated that RSSs will be revoked, it is important to note that the proposed indicative jobs growth target figure of the emerging RSS is considered to be founded on reliable evidence and that that evidence remains a material factor in determining an appropriate indicative jobs target figure for Babergh.

Assessing a realistic jobs growth target has also been considered from other approaches. One of these considered compensating for a shortfall in meeting the adopted\_RSS target of 30,000. This used the forecast figure for Babergh of 8,100 jobs and added one-third of the residual Suffolk Haven Gateway target figure\_(i.e. one third of 7,140 assuming a three-way split between Babergh, Ipswich and Suffolk Coastal) This gives a figure of 10,480 new jobs. However, it was felt that this was overly optimistic particularly given the loss of public sector jobs, and was only based on projecting target figures forward. Another calculation based on the forecast figure of 8,100 applied the same percentage growth to the jobs target for the district to 2031 as had been used in the adopted RSS for the growth in new houses, i.e. 20%. This gives a figure of 9,720 new jobs.

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

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<sup>17</sup> The indicative jobs growth target for Babergh district in the March 2010 draft revised RSS to 2031 was 9,700, with a note that apportionment of new jobs for the Ipswich Policy Area will be determined by Babergh, Ipswich, Mid Suffolk and Suffolk Coastal Councils.

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

- the new employment areas planned as part of the mixed use allocations in the New Directions of Growth;
- policies to protect existing employment sites;
- designation of strategic employment areas; and
- recognition of and support for our local strengths, particularly in non-B Use Class employment such as tourism, retail and other service sector businesses;
- a locally oriented, positive approach towards promoting the rural economy, jobs in rural areas and accordingly the overall vitality of Babergh’s considerable rural areas

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

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

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

### **Level of Housing Growth**

Based on the principles and distribution set out above (paras xx) and considering capacity factors, historic growth rates and existing commitments, it is considered that ‘new’ growth of 2,500 dwellings would be appropriate in the district over the next twenty years. The Housing Background Document provides more detail on the background to the level of growth. In addition to these ‘new allocations’ we have a good level of future housing supply or existing commitments in the district from planning permissions, Local Plan Allocations and sites where the principle of development has been established. These commitments are likely to provide for 2723 new dwellings in the district as shown in the table below. Looking at past trends it is clear that windfall figures have made up a significant proportion of the housing completions each year in the district (refer to the Housing Background Document for more information). Based on past trends a conservative allowance is therefore made for a windfall figure of 750 for the last 10 years of the plan period, although the figure allowed for is much lower than the average windfall figures over the last ten years. The ‘new’ growth figures, existing commitments and windfall figures would provide for an average annual build rate of 300 per annum as shown in the table below.

Plan period 2011 - 2031	Explanation of figures
2,500	Capacity for ‘new’ growth – bottom up approach
2,723 (Note 1)	Existing commitments = Remaining Local Plan allocations and outstanding planning permissions
750	Allowances for windfalls from 2021-2031 (annual rate of 75 over 10yrs)
5,973	Total ‘new’ capacity for growth and existing commitments
300	Future annual average growth rate = Total divided by 20 years

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

Over the past ten years, for the period of 2001 to 2011, relying on data collected in the latest Annual Monitoring Report of 2010-11, a net total of 2609 additional new dwellings were completed in Babergh. This equates to an average annual build rate of approximately 260 new dwellings per annum. It has to be mentioned that build rates have dropped significantly over the past two years and the average annual build rate between 2001 and 2008 in the district was approximately 280 new dwellings per annum. It can be seen that the future annual average growth rate would allow for some increase in housing in the district but at the same time would not be disproportionate to existing average annual build rates.

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

### ***Relationship of Jobs Growth to Housing Growth***

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

For Babergh district it would be difficult in practice to achieve a precise or very close geographical relationship between provision of new jobs and homes 'across the board', as may be easier within urban districts / areas. This is partly because of the need to sustain and revitalise the rural areas, as well as the urban areas, in a large mainly rural district (with a dispersed settlement and population pattern) of some 230 square miles. Babergh has a vibrant rural economy, with a surprising range of economic activity, and we believe it of great importance to sustain and promote this. It is one of the locally distinctive characteristics and strengths of the district.

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

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

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

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

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

#### 1. Babergh-Mid Suffolk

Although the results of a major public exercise and referendum in Spring in 2011 did not support the full and formal integration to form a single district council, the 2 Councils are integrating to form a single staff structure ready for April 2012, (see website of either council and the merger information hub: <http://www.babergh.gov.uk/Babergh/Home/Babergh+and+Mid+Suffolk+Integration+and+Proposed+Merger/BABERGH+AND+MID+SUFFOLK+WORKING+TOGETHER.htm>). During 2010 and 2011 informal but close working arrangements developed around integration of teams, work programmes and planning activity overall. Whilst it is considered too early to integrate towards a single Core Strategy at present, collaborative working has proved beneficial in respect of both this Core Strategy (BDC's top planning priority) and the Stowmarket Area Action Plan (MSDC's top planning priority). Further, the 2 Planning Policy teams commenced work on a joint Development Management Policies document in April 2011. Co-ordination of planning activity for the Ipswich Policy Area (IPA) (particularly localities around west / north-west Ipswich) has been in place for a number of years and led mainly by the IPA members and officers groups, plus work on the Haven Gateway Integrated Development Programme.

#### 2. The 4 Ipswich Policy Area (IPA) local authorities (including Suffolk County Council) / Suffolk Haven Gateway

The IPA as an explicit entity was identified and formalised long ago in various versions of the Suffolk Structure Plan (including the most recent Plan adopted in 2001). This included a planned and co-ordinated approach to housing provision in recognition that the borough boundary is tightly defined and that housing provision in the IPA, outside the borough itself, effectively serves and relates closely to the borough. The Babergh Local Plan, alteration No.2 2006 was prepared in the context of the Suffolk Structure Plan and implemented its strategy (including the strategic approach to housing in the IPA), planning policies and proposals at a local level. The IPA approach was also identified and continued in the adopted RSS of 2008, again requiring co-ordinated

housing provision and in addition, co-ordinated new jobs provision. The above-mentioned groupings from each constituent local authority and Haven Gateway Partnership led groupings have been used for co-ordination of growth targets and delivery.

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

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

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

### 3. Suffolk local authorities

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

### 4. Haven Gateway sub region (4 IPA authorities: Tendring, Colchester and Braintree districts in Essex; Suffolk and Essex County Councils) and New Anglia Local Enterprise Partnership (LEP)

The HGP has led and co-ordinated a great range of planning and related work for the sub-region throughout the last decade since inception in 2001. With 7<sup>nd</sup> tier and 2 top tier authorities as formal members, it works to promote a large area straddling south-east Suffolk and north-east Essex. The success of the partnership itself, its geography and its approach is illustrated by the recent formal joining by Braintree District Council. This almost completes the connection of HGP affiliated local authorities among Babergh's adjacent local authority neighbours. The only exception now is St

Edmundsbury, which is more remote from the ports and with ties looking westwards towards Forest Heath and the greater Cambridge sub-region.

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

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

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

### **Strategy for growth**

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

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

In a large, rural district with a dispersed settlement pattern like Babergh, many villages are remote from urban areas, therefore an approach to development tailored to Babergh's own local characteristics seems appropriate. This approach also allows for continued smaller scale growth of "hinterland" villages which, although they may provide less of a function for the surrounding area than the larger Core Villages, none-the-less would welcome and benefit from some growth of jobs and houses, especially providing homes which are suitable for local demand.

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

The Settlement and Distribution Policies below set out the overall strategy for future growth in Babergh until 2031 based on the functional settlement pattern and growth strategies described above and illustrated on Map 5.

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

The development strategy for Babergh is planned to a time horizon of 2031. Most new development (including employment, housing, and retail) in Babergh will be directed to the towns/urban areas, and to Brantham and the Core Villages and Hinterland Villages identified below:

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

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

#### **Brantham Regeneration**

A Master Plan will be prepared in conjunction with the landowner for the regeneration of the former industrial site at Brantham to provide a framework for the area defined by Local Plan Policy EM06 and to ensure the integration of the redevelopment with the village.

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

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

The core villages identified on the Key Diagram are:

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

#### **Hinterland Villages**

Hinterland villages are identified on the key diagram and listed below:

- Acton
- Aldham
- Assington
- Belstead
- Bentley
- Brent Eleigh
- Brettenham
- Burstall
- Chelmondiston
- Chelsworth
- Cockfield
- Copdock and Washbrook
- Edwardstone

- Elmsett
- Great Waldingfield
- Harkstead
- Hartest
- Hintlesham
- Hitcham
- Holton St Mary
- Kersey
- Lawshall
- Layham
- Leavenheath
- Little Waldingfield
- Monks Eleigh
- Nedging and Naughton
- Newton
- Pinewood
- Polstead
- Preston St Mary
- Raydon
- Shimpling Street
- Shotley
- Sproughton
- Stanstead
- Stoke By Nayland
- Stratford St Mary
- Stutton
- Tattlingstone
- Wattisham
- Whatfield
- Woolverstone

### **Countryside**

In the countryside, outside the towns/urban areas, core and hinterland villages defined above, development will only be permitted in exceptional circumstances subject to a proven justifiable need

The scale and location of development will depend upon the local housing need, the role of settlements as employment providers and retail/service centres, as well as having regard to environmental, physical and social infrastructure constraints, and the views of local communities as expressed in community/neighbourhood plans.

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

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

### **The Local Economy**

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

- sub-regionally and locally strategic sites at Sproughton, Brantham, Wherstead and Sprites Lane, Ipswich to accommodate the need for strategic and well-located sites for port-related and other businesses, and new business land and premises in Ipswich;
- allocations within mixed-use planned developments at Chilton and land off Lady Lane, Hadleigh (Local Plan allocations);
- employment land as part of mixed use development planned for the New Directions of Growth; and,
- where appropriate, allocations will be made to protect existing and provide for new employment areas in towns, villages and the rural area.

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

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

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

- re-use existing land or premises,
- contribute to farm diversification,
- enhance tourism and the attractiveness of the district as a destination for visitors; and/or
- design or produce low carbon goods or services,

will be encouraged subject to scale and impact on their location, and the provisions of other policies in this Core Strategy, particularly Policy CS10. A flexible approach will be taken to home working and other innovative approaches to sustainable economic activity that make a positive contribution to the local economy and are in scale and character with, and appropriate to, their location.

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

## Number and Distribution of New Homes

In addition to existing commitments and a “windfall” figure of 750 for the second half of the plan period (2021 – 2031) provision will be made for 2,500 new dwellings to be built in the following locations:

Location	Number of Dwellings
<b>Sudbury and Great Cornard</b>	<b>850</b>
<b>Hadleigh</b>	<b>250</b>
<b>Ipswich Fringe</b>	<b>350</b>
<b>Brantham Regeneration and Core and Hinterland Villages</b>	<b>1050</b>
<b>Total</b>	<b>2,500</b>

### The table explained

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

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

Proposals for redevelopment of the Brantham industrial site are still at a very early stage and it is therefore not possible to separate the number of houses that may be delivered as part of that scheme from the numbers of sites and quantity of dwellings that will need to be allocated among the many Core and Hinterland villages (in the subsequent Site Allocations document). There will be greater clarity after the Core Strategy is adopted (approximately mid 2012) and when progress is made on the Site Allocations document. It is anticipated that by that stage the parameters for development at the Brantham site will be clarified to a sufficient extent to guide the quantity of land allocation.

## **Managing future growth**

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

### **Sudbury/Great Cornard**

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

This growth has resulted in problems with traffic flow and congestion around the town centre and air quality problems in Cross Street. Key transport issues for Sudbury/Great Cornard include ensuring new development has good links to the town centre for pedestrians and cyclists, improving town centre facilities for bus passengers, a western bypass, traffic management and air quality improvements.

The Babergh Local Plan Alteration No2 (2006) allocated 19 hectares of land for residential development and 20.2 hectares for general employment and low impact employment uses at Chilton, known as the Chilton Mixed Use Development (Policy CP01). Limited progress has been made in bringing this land forward. In order to encourage implementation this outstanding allocation is programmed to deliver housing from the start of the plan period. However, additional housing will be needed in Sudbury/Great Cornard and a further area of land will be allocated at the Chilton Mixed Use Development to enable a further 350 dwellings to be accommodated. In addition to this, and to ensure land is available to deliver new employment sites and housing for Sudbury/Great Cornard at the right time a new direction of growth has been identified to the north east of the town. Implementation will be closely monitored, and the situation reviewed to enable the phased release of this additional land to be adjusted if necessary.

Future DPDs will provide detailed policies on both of these directions of growth. However it is important that all new development in Sudbury/Great Cornard respects the context in terms of character, infrastructure, integration and accessibility.

### **Policy CS3: Strategy for Sudbury/Great Cornard**

**An Area Action Plan DPD will, subject to resource availability, be prepared for Sudbury/Great Cornard to provide a framework for all new development in the town and to ensure that development of the larger greenfield sites is integrated into the town and delivered at the right time. In addition to expanding the capacity for development of the Chilton Mixed Use Local Plan (2006) allocation to the north, provision**

**will be made for land to be developed for employment uses and housing to the north east of the town.**

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

**Development in the New Directions of Growth will be closely monitored and the following phasing and timing reviewed to ensure delivery of an appropriate amount of new housing and employment land through the plan period:**

- i) 2011-2 onwards - implementation of the Chilton Mixed Use Development in accordance with Local Plan Policy CP01;**
- ii) 2016 review of progress with delivery of CP01 and target date set for release of land for employment and housing in the New Direction of Growth identified on the key diagram;**
- iii) mid – late part of plan period – masterplan submitted and approved and first phase of land released for development for employment land and up to 500 dwellings.**

**Development in Sudbury/Great Cornard should comply with other policies in the Core Strategy, particularly Policy CS10, and other subsequent documents, and where appropriate, provide:**

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

## **Hadleigh**

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

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

The natural and physical constraints and sensitive landscape setting of Hadleigh limit the amount and direction of growth and further development to the east of the town will rely on implementation of the A1071/Lady Lane roundabout for access and will, in effect, be an extension of the Local Plan (2006) mixed use allocation in Policies HS15 and EM03.

#### **Policy CS4: Strategy for Hadleigh**

**Subsequent documents / plans / proposals will set boundaries and provide a framework for growth within the New Direction of Growth shown on the key diagram. Development in Hadleigh will be closely monitored and reviewed to ensure delivery of an appropriate amount of new housing and employment land through the plan period.**

**Development in Hadleigh should comply with other policies in the Core Strategy, particularly Policy CS10, and other subsequent documents, and where appropriate, provide:**

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

**Hadleigh will be promoted as a visitor attraction and a wide range of diverse uses and facilities will be encouraged. Small scale refurbishments and redevelopments aimed at enhancing retail quality and consumer choice will be supported in this centre.**

#### **Ipswich Fringe**

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

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

The Special Landscape Area includes the Chantry Vale area on Ipswich's western boundary and the River Gipping which separates this area from the former Sugar Beet factory to the north. The River Gipping is an important natural feature that will be protected for its biodiversity and recreational value. A country park along the

southern edge of Ipswich provides an essential green space for local residents, and forms a potential link in a wider green infrastructure network. This has also been identified as area potentially suitable for the location of wind turbines to produce renewable energy for homes and businesses in the area.

#### **Policy CS5: Strategy for Growth in the Ipswich Fringe**

**Subsequent documents / plans / proposals will set boundaries and provide a framework for growth within the New Direction of Growth shown for Babergh's Ipswich Fringe on the key diagram.**

**In addition to Policy CS10 and other subsequent local plan documents, development in Babergh's Ipswich Fringe should:**

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

#### **Brantham redevelopment**

The former industrial sites at Brantham pose a unique challenge for the District. Much of the site is derelict, with buildings in need of demolition and land in need of decontamination. However, there is a significant and apparently thriving remaining operation by ICI Ltd, known as Imagedata..

The site is partly crossed and partly abutted by the main London Liverpool Street to Norwich rail route, and has estuarial frontages. The industrial site is separated from the main village by Greenfield land within the same ownership. Adjacent land is designated as an AONB and as a SSSI. The intertidal mudflats and saltmarsh nature of the adjacent Stour estuary means that the area is also protected as a Special Protection Area (SPA) under the 1979 EU Birds Directive and Ramsar designations under the 1971 Ramsar convention. Unsurprisingly therefore the tongue of land to the south of the railway is of wildlife significance. Parts of the area are subject to flood risk, and proposals for development will be required to comply with PPS 25: Development and Flood Risk (or any successor policy documents), including the preparation of a Flood Risk Assessment and sequential test (as appropriate). It is acknowledged that there are challenges and constraints to regenerating this site, but doing nothing is not an acceptable option, particularly where so many local jobs have been lost.

Brantham village underwent significant growth in the 1960s and 70s, at the time related to the industrial operation. The site is now ripe for a major regeneration scheme, in accordance with the principles laid down in the adopted Local Plan policy EM06 and the Council's Planning Position Statement of 2008. It will be expected that green infrastructure will be central to the character and layout of such a scheme in accordance with Policy CS10 (particularly with regard to providing mitigation within the proposed development for potential recreational impacts on the SPA and Ramsar site), and that it will deliver new employment buildings, new dwellings and improved

community facilities proportionate to the amount of development permitted, all in accordance with an agreed Master Plan. A high quality development will be sought, particularly in the event that riverside development is sought.

The masterplan and mitigation strategy will need to ensure that direct and indirect negative impacts on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site are avoided. In particular, provision of alternative Natural Green Space will be required, in line with the Haven Gateway Green Infrastructure Strategy. Provision and funding for the green infrastructure will be provided by the developer(s). It is anticipated that the green infrastructure provision would include creation of a new Public Open Space, for which the design and management plan should aim for quality suitable for designation as a Local Nature Reserve.

### **Core and Hinterland Villages**

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

The approach advocated for the management of growth in the Core Villages and their hinterlands, has many benefits for the communities. The application of Policy CS 6 and other relevant policies in the Core Strategy will lead to the following benefits;

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

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

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

It is clear that the core villages identified are very varied and their needs and factors which influence what is an “appropriate level of development” will vary from village to village. Although a total number of 1050 new dwellings is indicated in Policy CS2, this includes Core Villages, Hinterland villages and Brantham regeneration area. It is important that this is not viewed as a sum simply to be divided between the number of settlements listed. The approach to the distribution within this, is to be driven by the concept of the function of the settlements, their role in the community and the capacity for a particular level of growth which will be guided by many factors, which will result in a different level of development being identified as “appropriate” in different settlements, even those within the same category. The approach will also provide for a degree of in-built flexibility within the catchment area.

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

It will also be important to ensure that any development in the Core and Hinterland villages is supported by an appropriate level of infrastructure. As with the larger strategic sites provision of adequate infrastructure to serve developments will be required. In many cases this may need to be by way of a financial contribution, secured through legal agreements under section 106 of the Town and Country Planning Act, and through a mechanism known as the Community Infrastructure Levy (CIL) which is anticipated to be established at a later date (refer to para ???). One of the key benefits of the approach suggested will be to enable meaningful infrastructure improvements to support development in these areas, although contributions may need to accumulate over a number of years to achieve this. The approach to infrastructure delivery will also follow the functional cluster concept, to reflect the role and relationship between settlements, particularly when it comes to the use and demand for many of the facilities which make up the infrastructure. Policy CS 17 reflects this. In the case of affordable housing the policy consideration for exception schemes will operate within the context of the functional clusters, thus enabling greater flexibility and increasing the opportunities to address local housing need in some of Babergh's more rural areas.

#### **Policy CS6: Strategy for development in Core and Hinterland Villages**

**Proposals for development in Core Villages will be approved on sites allocated in the Site Allocations DPD, and elsewhere where proposals score positively when assessed against Policy CS10 and the following matters are addressed to the satisfaction of the local planning authority where relevant and appropriate to the scale and location of the proposal:**

- **site location and sequential approach to site selection;**
- **Sustainability Appraisal;**
- **Locally identified need - housing and employment, and specific local needs such as affordable housing;**
- **Locally identified community needs; and**
- **Cumulative impact of development in the area.**

**Comprehensive redevelopment proposals for the site identified and allocated as the Brantham Industrial Area in the 2006 Babergh Local Plan will be approved where proposals comply with criteria in Local Plan Policy EM06 and policies in this Core Strategy, principally Policy CS10.**

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

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

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

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

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

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

### **Rural areas**

A large proportion of the district is made up of rural areas with farmhouses, individual dwellings and small groups of cottages. Small groups of dwellings and hamlets will fall within functional clusters. However, their remoteness and lack of any services or facilities, mean that such groups and hamlets are classified as countryside. As such these, are subject to a long established policy approach towards rural areas, which generally seeks to prevent development other than that required for agriculture and other operations that need to be located in the countryside.. The changing nature of the rural economy has led to the need to provide a framework which allows for some economic diversification in rural areas. It is important to retain an appropriate balance and maintain adequate control to ensure the locally distinctive rural characteristics are not lost. Section 3 provides further policy guidance on the rural economy.

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

### **3.1 Sustainable Development**

#### **Introduction**

The planning system and Plans for Babergh aim to ensure that Sustainable Development principles are followed and that growth and development are sustainable. There are many definitions of Sustainable Development in use. For the United Kingdom, the Government published its Sustainable Development Strategy, “*Securing the Future*”, in 2005. This states that ‘the goal of Sustainable Development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations.’ The UK Sustainable Development Strategy sets out five guiding principles and four agreed priorities to deliver this goal:

#### The 5 Principles

- Living Within Environmental Limits
- Ensuring a Strong, Healthy and Just Society
- Achieving a Sustainable Economy
- Promoting Good Governance
- Using Sound Science Responsibly

#### The 4 Priorities

- Sustainable Consumption and Production
- Climate Change and Energy
- Natural Resource Protection and Environmental Enhancement
- Sustainable Communities

Planning Policy Statement 1: Delivering Sustainable Development (2005) provides national planning policy guidance in this area for delivering sustainable development through the planning system at the local level. This PPS is expected to be replaced by the new National Planning Policy Framework (NPPF) in due course. The draft NPPF published in July 2011 re-states the definition of sustainable development from the 1987 Brundtland Commission as summarised above, and goes on to clarify that “For the planning system delivering sustainable development means:

- **planning for prosperity (an economic role)** – use the planning system to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure
- **planning for people (a social role)** – use the planning system to promote strong, vibrant and healthy communities, by providing an increased supply of housing to meet the needs of present and future generations; and by creating a good quality built environment, with accessible local services that reflect the community’s needs and supports its health and well-being; and

- **planning for places (an environmental role)** – use the planning system to protect and enhance our natural, built and historic environment, to use natural resources prudently and to mitigate and adapt to climate change, including moving to a low-carbon economy.”

The draft NPPF requires local development plans to contain and adhere to the new Presumption in favour of sustainable development, as follows:

‘At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible. Local planning authorities should:

- prepare Local Plans on the basis that objectively assessed development needs should be met, and with sufficient flexibility to respond to rapid shifts in demand or other economic changes
- approve development proposals that accord with statutory plans without delay; and
- grant permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.

All of these policies should apply unless the adverse impacts of allowing development would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

**Source:** draft NPPF, paragraphs 14-15

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

Sustainable development principles combine the three elements necessary to achieve an appropriate balance in that development needs to be environmentally, economically and socially sustainable. All three elements are of great importance for the Babergh area and need to be respected. These find expression within the Babergh Strategic Plan 2008-18; and for the Babergh area this will mean:

- Doing our best to protect and enhance the (natural and built) environment (expressed mainly by the identified Babergh theme of ‘A Greener and Cleaner Babergh’)
- Promoting a strong, diverse economy and prosperity (expressed mainly by the identified Babergh theme of ‘A strong and sustainable Babergh economy’)
- Maintaining the existing settlement pattern and that of a large number of distinct but interlinked communities (expressed mainly by the identified Babergh theme of ‘Vibrant Places and Strong Communities’)

This Core Strategy (and wider BDF) aims to strike an appropriate balance between these three elements, although their achievement does not necessarily conflict. In summary it is possible to identify some key local considerations with a particular bearing on this balance. Local circumstances mean that the achievement of environmental sustainability will often not be possible in transport terms, due to the dispersed rural nature of the district. In addition, the environmental sensitivity of the district means that large-scale, on-shore renewable energy generation, for example,

will also be difficult to accommodate in an acceptable way. The attractions for the district for tourism, a key driver of the local economy, (inter alia) mean that maintaining its environmental qualities is essential.

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

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

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

### **Built and Natural Environment**

The Babergh District has a rich and varied built and natural environment. The protection and enhancement of the environment is identified as an important priority internationally, nationally, regionally and locally.

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

### **Policy Context**

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

## Natural environment and biodiversity

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

In order to ensure the protection of these European sites for generations to come, measures will be implemented to take account of the pressures of development which may arise from policies within the Babergh Core Strategy. The main effect which could arise as a result of the proposed development over the next 15 years is from increased population growth in the district, and the allocation of land for additional jobs and housing, which in turn may result in increased recreational pressures on the European sites through rises in visitor numbers. These sites support species which are susceptible to disturbance, and without appropriate measures in place there is a risk of degradation to these sites.

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

- 1. Reducing/ preventing an increase in recreational demand on the estuaries** – steering the distribution of housing away from the estuaries, and the provision of new Accessible Natural Green Space in new developments to reduce recreational demand on the estuaries (see Policies CS9 and CS10).
- 2. Monitoring Programme** – this will review and link into studies such as that being undertaken by the surrounding local authorities on the Deben Estuary; look to include baseline visitor surveys; and monitor the SPA / Ramsar site at a frequency to be agreed with Natural England and neighbouring Councils<sup>18</sup>. Reporting on this monitoring plan will be tied in with the annual monitoring programme described under Policy CS18.
- 3. Planned Mitigation Measures** - if during the monitoring programme it is found that recreational pressure is increasing, then this will trigger the requirement to consider whether additional mitigation is required.

In addition, with regard to the SPAs and Ramsar sites, any development proposal that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitat Regulations<sup>19</sup> at Site Allocation and/or project application stage. The HRA for this Core Strategy does not obviate the need for such assessment. If it cannot be ascertained that there would be no adverse effects on site integrity the project will be

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<sup>18</sup> In the event that the disturbance at these sites is found to have increased compared to the 2007 report, a visitor survey will be undertaken to establish where the increased pressure is arising from. This measure is required to ensure that any unexpected effects can be identified and their sources confirmed so that action can be taken.

<sup>19</sup> The Conservation of Habitats and Species Regulations 2010

reused unless it passes the tests in Regulation 62 (in which case any necessary compensatory measures will be secured in accordance with Regulation 66).

### **Landscape and character**

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

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

One of the most precious natural assets in England is its landscape. Babergh makes a valuable and varied contribution to this. The Suffolk Coasts and Heaths AONB and Dedham Vale AONB including the Stour Valley cover a considerable part of the district. Legislation provides protection and guidance within these areas and both have Management Groups providing a robust framework for management of challenges facing these areas in the future. The Suffolk Coasts and Heaths AONB is a product of its underlying geology, shaped by the effects of the sea and the interaction of people with the landscape over time. The Shotley peninsula is made up varied landscape types which contribute to the overall mosaic of the AONB, the main types within the Babergh Area are<sup>20</sup>:

- Coastal Levels;
- Estate farmlands; and
- Valley meadowlands.

At the heart of the Dedham Vale AONB and Stour Valley is the area known as “Constable Country” centred on villages including Dedham, Flatford and East Bergholt. John Constable’s famous paintings of this landscape influenced the national designation as an AONB which is now widely recognised as typifying lowland English countryside. Key features within the landscape in this area which are significant include; the meandering river and its tributaries, gentle valley slopes with scattered woodlands, grazing and water meadows, sunken rural lanes, historic villages with imposing church towers and historic timber framed buildings, small fields enclosed by ancient hedgerows and a wealth of evidence of human settlement over centuries. The Stour Valley is predominantly rural with a medieval settlement pattern. Woodlands are situated within the tributary valleys and much of the valley floor comprises arable crops, with the exception of the areas such as Sudbury Common Lands<sup>21</sup>.

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<sup>20</sup> Suffolk Coasts and Heaths Management Plan Summary 2008-2013

<sup>21</sup> Dedham Vale AONB and Stour Valley Management Plan 2010-2015

The whole district including the wider landscape beyond these designated areas has been defined with an appropriate landscape character type. The Suffolk Landscape Character Assessment is a web-based resource designed to support the maintenance and restoration of the landscape through the planning process ([www.suffolklandscape.org.uk](http://www.suffolklandscape.org.uk)). It also promotes a wider understanding of the landscapes of Suffolk. The landscape character types prominent in the Babergh District include:

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

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

### **Special Landscape Areas**

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

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

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

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

- Ancient Woodland ;
- Ancient Hedgerows (species rich)
- Lowland hay meadows;
- Farmland pond
- Grazing marsh

- Cereal field margins
- Stour and Orwell inter-tidal mudflats and salt marsh (the habitat for wildfowl and water fowl)

Many of these areas of habitat are also designated as SSSIs, landscape designations or international sites such as the mudflats and salt marshes of the Stour and Orwell Estuaries. However some of these habitats will inevitably fall outside a specific boundary or designation, but nevertheless serve an important function, and consideration may need to be given to the need for management of such areas.

### **Strategy For Environmental Enhancement**

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

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

### **Historic Environment**

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

English Heritage maintains the register of listed buildings of which there is a wealth in Babergh, both extensively in the rural areas and centred around the historic villages and towns. Again often sufficient protection is offered by legislation to listed buildings, but careful consideration of the character of other historic assets, are also important although not listed. There are 29 Conservation areas in the District, 17 of which have detailed Conservation Area Appraisals providing considerable background and context offering helpful guidance. A further programme of Conservation Area Appraisals continues to progress.

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

### **Strategy For the conservation and enjoyment of the historic environment**

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

- Continue to support the conservation, repair and enhancement of historic assets through advice from the Council’s Planning Service. (Shared resource with adjoining authority).
- Continue to support Conservation Area designations through the positive contribution provided by Conservation Area Appraisals delivered through the Council’s Planning Service (shared resource with adjoining Authorities). Continue to progress with the programme to complete Conservation Area Appraisals for the 12 remaining Conservation Areas.
- Continue to provide advice to owners of Listed Buildings, in particular to proactively encourage positive repair and enhancement of buildings identified as being at risk.
- Provide support and guidance to encourage development which may affect historic assets and ensure new development makes a positive contribution to local character and distinctiveness.
- Encourage enjoyment of the heritage assets through encouraging promotion of locations with a rich historic environment by organisations or communities with an interest in the heritage assets. In association with this promotion, also encourage the preparation of interpretive information about the assets to share knowledge and understanding of the past. Manage the interest in these heritage rich locations to ensure benefits to the local economy are maximised whilst balanced with the environmental value.

### **Climate Change**

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

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

The Government have advised local planning authorities that planning policies to tackle climate change should seek to both mitigate and provide for adaptation, and should aim for carbon reduction to zero in new developments, and the provision of renewable energy for residual energy requirements. Policies need to be appropriate to the area, and be based on evidence. Requirements for carbon reduction measures must be viable and achievable in the context of other planning requirements and policy constraints.

Policies CS7 and CS10 set out a framework of criteria for sustainable development, and in addition we need to look at the energy needs of new development and encourage the provision of renewable energy either on-site, or through community schemes, and where viable and appropriate, through larger scale generation of renewable energy.

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

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

Opportunities to improve water quality in all watercourses and water bodies will be taken where possible and measures will be taken to prevent the deterioration in current water quality standards. Site specific policies for allocated sites and detailed policies for delivering sustainable design and construction and climate resilient development will be set out in Site Allocations and Development Management Development Plans Documents (DPDs).

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

new developments, and will support local agriculture and the reduction of 'food miles' by enabling the provision of local farmers' markets and similar initiatives.

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

In addition to the studies referred to, and the new policy directions in this Core Strategy, work continues with Suffolk County Council's 'Greenest County' initiative; areas in the Babergh Ipswich Fringe are being assessed for suitability for the potential location of wind turbines; and Babergh is a joint recipient benefitting from the Climate Change Skills Fund to trial a Shared Sustainability Support Officer to help applications involving renewable technologies through the Planning process.

In the future other areas of study may include:

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

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

The construction industry and Government bodies and organisations are working toward achieving zero carbon new homes, and standards have evolved that will help achieve this goal. 'Building for Life' is the national standard for well-designed homes and neighbourhoods run by a partnership of CABI, the Home Builders Federation and Design for Homes. Building for Life assessment is based on 20 criteria set out as a series of 20 questions which are used to evaluate the quality of new housing developments under the headings: environment and community, character, streets, parking and pedestrianisation, and design and construction. Along with many other local authorities Babergh will use the Building for Life standards to assess proposals

for new homes. Non-residential developments will be expected to use the Building Research Establishment Environmental Assessment Method (BREEAM), an internationally recognised environmental assessment method and rating system.

### **Policy CS7: Reducing carbon dioxide emissions**

**Larger scale residential developments, particularly those within the future directions for growth, will be expected to achieve the Building For Life Silver Standard.**

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

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

Site specific policies for allocated sites and detailed policies for delivering sustainable design and construction and climate resilient development will be set out in Site Allocations and Development Management DPDs.

Planning for climate change in the future is only part of the picture. At the other end of the scale are existing buildings. The character of Babergh district is enriched by the number of listed buildings and conservation areas, and we should not overlook the need for heritage assets to contribute to adapting to climate change and reducing carbon emissions. The re-use of an existing building is a very sustainable form of development minimising waste, and often listed buildings are constructed from sustainable materials. Some perform well in terms of heat loss/solar gain, and thermal insulation. However, many will require modification and adaptation to improve energy efficiency and resilience to climate change. In such cases the Council will carefully weigh the potential harm to the heritage asset and character of the locality against the public benefit of mitigating the effects of climate change in accordance with Government policy (set out in PPS5: Planning for the Historic Environment). We will consider available evidence and assess the need to address this matter in criteria-based policies for Babergh’s heritage assets in the Development Management DPD.

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

An approach that is particularly useful in considering action in the existing housing stock is to start with the energy hierarchy. This takes a pragmatic approach looking firstly at low cost, energy saving options and only when the simpler and more cost effective options have been explored considering high impact, high cost, energy-generating options. The first, step in the hierarchy is simple: to reduce the need for energy (which could be simply wearing an extra layer and turning the heating down, and turning off radiators in unused rooms); the second step is an area where many actions exist that cost very little or nothing at all: from closing curtains and doors, to

installing insulation, secondary glazing and /or an energy efficient boiler; and the third and more expensive step would be to switch to low carbon or renewable energy such as installing solar thermal or photovoltaic panels, or a wood burner, or ground source heat pump (depending on individual and local circumstances). Owners and occupiers of the existing housing stock in Babergh, including historic buildings, can take steps in the energy hierarchy to improve energy efficiency in the district, and the Council will promote and encourage this through various initiatives and working with other authorities and organisations.

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

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

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

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

As part of this strategy the Council will also

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

## **Policy CS8: Renewable Energy**

**Development within the New Directions of Growth and other large-scale development proposals will be required to use on-site renewable energy sources, decentralised renewable or low carbon energy sources with the aim of achieving 10% of the predicted carbon reductions of all types of development.**

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

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

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

**Note:** Development such as wind turbines will not automatically be viewed as sustainable sources of renewable energy, as in unsuitable locations they can result in increases in mortality among birds. The impacts on receptors such as European sites will need to be considered for each individual allocation or scheme proposal.

## **Green Infrastructure**

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

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

- Create links which connect existing spaces to each other especially close to areas where people live and work;
- Improve access and recreation opportunities including providing alternative locations away from more sensitive locations;

- Enhance links from urban areas to the countryside
- Enhance the character and local distinctiveness of the landscape.
- Make a positive contribution to creating a sense of place especially within large new developments including the strategic sites. Use green infrastructure opportunities to inform the shape and character of development and ensure the design reflects this. Green field sites and those within or close to sensitive landscapes will be particularly important, including the strategic site at the Ipswich fringe.

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

**Existing green infrastructure will be protected and enhanced. In new developments green infrastructure will be a key consideration and on the larger sites it will be central to the character and layout of development. All new development will make provision for high quality, multi- functional green infrastructure. Particular consideration will be given to ensuring new provision establishes links with existing Green infrastructure, providing a well connected network of green infrastructure in urban and rural areas.**

**Specific requirements, characteristics and standards of GI provision within strategic sites and larger site allocations will be identified in the Site allocations DPD and where appropriate through master planning mechanisms.**

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

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

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

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

Brownfield land is in short supply in this district, and what is available is often subject to competing pressures from housing and employment development. It is important as a general (but often crude) principle that the use of brownfield land is prioritised. However, although land is largely a finite resource the level of brownfield land re-use is not considered a very good indicator in itself of sustainable development. This is partly because brownfield land targets, especially when afforded undue weight for residential development in planning decisions, can result in inappropriate uses of sites or displacement of existing uses, including existing beneficial uses. Further, the most suitable use of a site in planning terms may be precluded and sometimes an inappropriate use of a site altogether can result. These types of scenarios can often be both contrary to sustainable development principles and militate against the creation of quality developments and environments.

For such reasons, our approach is:

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

Whilst having regard to the national and the extant RSS brownfield land re-use target of 60%, Babergh's circumstances, evidence and priorities suggest that 45% would be a locally appropriate brownfield land re-use target. This would be in line with the target level that has been used as a local Babergh performance indicator.

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

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

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

See the Sustainability, Climate Change and Environment Technical Supporting Paper for further detail

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

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

### **Strategic Developments**

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

A masterplan must be a comprehensive design strategy for the whole scheme over the lifetime of its development. Within the boundaries of the proposed development area it will define neighbourhoods and development parcels and their phasing, including any growth envisaged beyond the plan period. It should set design principles and specify design features and matters such as materials, height, layout, density, mix of uses, and demonstrate how local distinctiveness is achieved throughout all elements of the development. A masterplan should show green infrastructure and links, major landscaping and open space proposals to assimilate new development into the landscape and the creation of new habitats, and a bio-diversity plan, including species and habitat protection, mitigation, compensation and new habitat creation measures for sustainability.

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

Measures to promote sustainable living patterns should be outlined, including development of Travel Plans where appropriate. Pedestrian and cycle links are very important in new developments, particularly those on the edge of urban areas, and should include access to all workplaces, shops, and community facilities, as well as providing access to the surrounding countryside and open spaces.

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

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

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

### **Policy CS10: Sustainable Development**

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

- **respect the landscape, landscape features, streetscape/townscape, important spaces and historic views;**

- **make a positive contribution to the local character, shape and scale of the area;**
- **protect or create jobs and/or strengthen or diversify the local economy;**
- **ensure an appropriate level of services, facilities and infrastructure are available or provided to serve the proposed development;**
- **retain, protect or enhance local services and facilities and rural communities;**
- **protect and enhance biodiversity, prioritise the use of brownfield land for development, and use and greenfield land and scarce resources efficiently;**
- **address climate change through design, adaptation, mitigation and by incorporating or producing sources of renewable or low-carbon energy;**
- **make provision for open space, amenity, leisure and play through providing, enhancing and contributing to the green infrastructure of the district**
- **create green spaces and/or extend existing green infrastructure to access to shady outdoor space within new developments and increase the connectivity of habitats and the enhancement of biodiversity and mitigate some of the impacts of climate change e.g. enhancement of natural cooling and reduction in the heat island effect, provision of pollution sequestration for the absorption of greenhouse gases, and through the design and incorporation of flood water storage areas, sustainable drainage systems (SuDS);**
- **minimise both the risk of flooding as well as the risk from flooding to people and property, and incorporate, where appropriate, flood mitigation and/or flood resilience measures;**
- **minimise surface water run-off and incorporate sustainable drainage systems (SuDS) where appropriate;**
- **minimise waste (including waste water) during construction, and promote and provide for the reduction, re-use and recycling of all types of waste from the completed development.**
- **be designed to make the best use of the site in terms of solar energy, passive heating and cooling, natural light and natural ventilation;**
- **use sustainable building methods that optimise energy and water efficiency, and use techniques, methods and materials resilient to climate change (e.g. resilience to high winds and driving rain);**
- **be accessible to people of all abilities including those with mobility impairments;**
- **seek to minimise the need to travel by car using the following hierarchy: walking, cycling, public transport, commercial vehicles and cars) thus improving air quality; and**
- **where appropriate to the scale of the proposal, provide a transport assessment and Travel Plan showing how car based travel to and from the site can be minimised, and proposals for the provision of infrastructure and opportunities for electric, plug-in hybrid vehicles, and car sharing schemes.**

**Development Briefs/Masterplans will be required for the New Directions of Growth, and for sites which by virtue of size, location or proposed mix of uses are determined by the local planning authority to require a master planning approach. A landscape/townscape appraisal, multifunctional Green Infrastructure strategy, and Design Concept statement will be essential components for Development Briefs and Masterplans.**

**Proposals for development must ensure adequate protection and enhancement is given to distinctive local features which characterise the landscape and heritage assets of Babergh's built and natural environment, but are outside boundaries of designated sites covered by statutory legislation. In particular proposals should protect and where possible enhance the landscape and heritage areas including habitats and features of landscape, historic, architectural, archaeological, biological, hydrological and geological interest. Adaptation or mitigation will be required if evidence indicates there will be damaging impacts if a proposal is otherwise acceptable and granted planning permission.**

**Within the SPAs and Ramsar sites any development that would have an adverse effect on the integrity of a European site either alone or in combination with other plans or projects will be refused (see Note 2),**

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

Note 2: that is unless the project passes the tests in Regulation 62 of The Conservation of Habitats and Species Regulations 2010 as referred to in paragraph **zz** above.

### **3.2 Mixed and Balanced Communities**

The Babergh District and beyond is made up of many communities. The aim is to retain those existing mixed and balanced communities and ensure that development sustains and enhances them. A successful community is one which is mixed and balanced in the broadest sense. This mix includes not only a mix of uses, including homes, jobs and facilities, but also a mix of people. Planning is at the heart of this by enabling an appropriate mix of houses to attract families and individuals from a variety of backgrounds, of various sizes and with a range of social and economic demands. The thrust of the Strategy is underpinned by the presence of mixed and balanced communities, recognising that in the rural areas, these communities stretch beyond individual towns and villages and also include a more extensive hinterland.

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

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

#### **The local economy – planning for new jobs**

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

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

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

### **Town and Village Centres**

Sudbury, Hadleigh and the larger villages provide the shops and services that residents need for their day to day needs (convenience shopping). Sudbury is the hub of a wide rural area and provides a good range of non-food shops (comparison shopping), services and leisure activities. Hadleigh provides a good range of shops, including individual and specialist shops, and has an important role as a tourism and visitor destination. The Core Villages provide local shops, services and community facilities and many of these villages also attract visitors and tourists and provide employment in specialist shops, pubs, hotels and restaurants. This additional 'layer' of economic activity undoubtedly contributes to the vitality and viability of these villages. In the towns and urban areas, particularly Sudbury and Great Cornard and Pinewood in the Babergh urban area on the fringe of Ipswich, local centres provide much needed shops and services, and where these urban edges are expanding these local centres are an essential part of local infrastructure.

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

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

The Council will continue to support the provision of a range of shops, services, leisure, cultural, office, hotels and tourism businesses at a level appropriate in character and to the location in the shopping hierarchy, and will focus growth and expansion in existing town, village and local centres.

### **Policy CS11 Town, village and local centres**

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

**New town centre uses, particularly evening and night-time uses, will be assessed for potential impact, including cumulative impact, on the character and function of the centre, anti-social behaviour and crime, including considering security issues raised by crowded places, and the amenities of nearby residents**

## **Policy Context**

PPS4: Planning for Sustainable Economic Growth sets out the government's objectives for prosperous economies and encompasses policies for economic growth in urban areas, town centres and rural areas. "Economic development" includes public and community uses and main town centre uses, and the term now also applies to other development which achieves either the provision of employment opportunities; generates wealth; or produces or generates an economic output or product. This wider definition recognises the value to the economy of non-<sup>22</sup>B Class enterprises, including, for example, education, and tourism/hospitality/catering, which are particularly important in Babergh.

As well as support for business generally, national policy requires Councils to identify a range of sites to facilitate a broad range of economic development, including mixed use sites. National policy recognises that town centres are important to the local economy and need to be protected and enhanced, and continues to support economic development in rural areas through re-use of redundant buildings and farm diversification, and seeks to ensure sufficient shops and facilities are available in rural areas to serve people's day-to-day needs.

## **The local context**

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

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

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

Historically the supply of employment land has been low, and take-up of new sites has been fast (e.g. Crockett Road in Hadleigh (extension to the Lady Lane employment area), and Churchfield Road on the Chilton Industrial Estate in Sudbury). Business sites and premises change hands all the time, and firms move to larger premises within the local area to facilitate expansion. The retention of a range of sites and premises across the district for employment use is essential to Babergh's

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<sup>22</sup> The Use Classes Order – reference in here

strategy of supporting the local economy and encouraging growth and innovation, and is therefore included in Policy CS2 as a key component of an integrated growth strategy. The SHG ELR provides a local and sub regional context for this approach, and sites will be monitored and reviewed in subsequent DPDs.

### **Strategy for the future**

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

Babergh's Economic Strategy<sup>23</sup> is summarised in paragraphs xx – yy and Policy CS2 above. The strategy is based on recognising the drivers of our local economy and our existing strengths, and identifying the potential for future new businesses and employment opportunities, protecting existing employment sites and premises, and in ensuring sufficient land is made available to provide for the needs for a diverse range of businesses.

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

- Port and logistics
- Information and Communications Technology;
- Manufacturing – reflecting the historical advantage/local tradition
- Tourism and related leisure/hospitality service sector
- Non-B Use Class employment – including public sector jobs such as teaching, health and welfare;
- Rural/agricultural/diversification – including farm shops and farmers markets.

Our approach will be to create opportunities for jobs in these sectors by protecting existing and allocating new sites in the district in locations that meet the needs of the local economy, by creating sustainable new mixed use developments, and through flexible policies that support non-B Use Class employment in the tourism/culture/leisure/hospitality sectors and new ways of working, particularly home working.

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

Planning for new jobs cannot take place in isolation, and we recognise that business activity doesn't follow local authority boundaries, and that some of the employment areas in Babergh are important outside the district because of their location. In addition, Ipswich borough area is geographically constrained, and within Suffolk and the Haven Gateway area local authorities have traditionally considered the wider

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<sup>23</sup> Supporting Document

Ipswich Policy Area in planning for jobs and homes. The Council will continue to work with our neighbouring authorities and sub-regional economic groups to consider the most appropriate distribution for new employment development taking into account the needs of businesses, land availability, environmental constraints, and a sustainable relationship with the parts of the Ipswich Fringe proposed for housing growth. The SHG ELR review of allocated sites and joint working with Ipswich Policy Area neighbours (particularly on sites close to the A14) has identified the importance to the sub region of strategic employment sites with good access to the A14, A12 and the Port of Felixstowe. Strategic employment sites within the sub-region that are located in Babergh district will be protected for employment development and allocated in the Site Allocations DPD.

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

### **Policy C12: Local Economic Strategy**

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

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

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

### **Rural Economy**

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

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

Appropriate employment opportunities in these locations provides local employment, and offers opportunities closer to home, rather than relying only on the larger urban centres, although it is recognised this is where most employment should be located.

Often opportunities for rural employment in a natural / historic resource rich area like Babergh are associated with tourism. Wherever possible, support for the tourism economy will be encouraged, within the many popular locations in the district. The Government guidance on this issue is clear in PPS 4, that support should be given to sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors and which utilise and enrich, rather than harm, the character of the countryside, its towns, villages, buildings and other features. It remains necessary however, to ensure environmentally sensitive sites and landscapes are protected.

Tourism development includes accommodation, and the potential to encourage and enhance the visitor offer in Babergh district will be explored further. As well as the traditional visitor accommodation such as hotels, bed and breakfast, and self-catering accommodation there is a need to meet demand for camping. More UK residents are taking holidays at home rather than travelling abroad (the so-called "stacation"), and there are a growing number of leisure experiences, such as festivals, which together with a resurgence in the popularity of various forms of camping from motorhomes and caravans to ready-erected tents and temporary structures, and luxury or glamorous camping ("glamping"), mean that this area of tourism and leisure has the potential to play a part in the growth of the local economy.

New development is also required to be located within or close to existing centres and villages. Other, more remote rural locations will only be justified where the required facilities are needed in conjunction with a particular countryside attraction and there are no suitable existing buildings or developed sites available for reuse.

### **Policy C13: The Rural Economy**

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

**The economy in the rural area will be supported through the encouragement of proposals for farm diversification, the re-use of redundant rural buildings, sustainable tourism and leisure based businesses (including those offering a diverse range of visitor accommodation, activities or experiences), the protection of small rural businesses and, where appropriate, farm shops and farmers markets. All proposals for development should comply with other policies in the Core Strategy, particularly Policy CS10, and other subsequent documents as appropriate.**

## **Homes for all**

### **Background**

It is important that the right kind of housing is provided to meet the needs of Babergh's communities. The established principle (in Planning Policy Statement 1: Planning for Sustainable Development (PPS1) and Planning Policy Statement 3: Housing (PPS3)) is that new developments should provide a variety of housing to stimulate the creation of mixed and balanced communities. This applies equally to open market housing and affordable housing.

### **The Evidence**

Babergh's evidence shows that the current housing markets in the district are not fully balanced. This means that particular types and sizes are under-represented. The greatest need in the housing market is for small (one and two bedroom) and medium sized (three bedroom) houses. It is likely that this will remain the case during the plan period. This type of need applies to market housing, intermediate affordable housing and social rented affordable housing. The evidence also shows that the accommodation needs for the elderly or those who need specialist support is currently not fully addressed in Babergh. The evidence predicts that this demand will increase with an increasingly elderly population in the district.

### **Local Context**

Babergh is a rural district with few sites coming forward for larger developments particularly in rural areas. To balance the housing market in the district, all but very small, developments should provide a mix of house types and sizes in accordance with established needs. It is not considered practical to require a particular mix of dwellings on very small sites although these developments should contribute to the overall aims of mixed communities. Larger strategic developments will have an important role to play in addressing the particular needs of disadvantaged groups within the community, including the elderly population and vulnerable groups in the district.

Responses at the Issues and Options consultation stage were in favour of including a policy about mix of dwelling sizes and types in the Core Strategy to deal with this issue. This was reinforced in feedback to the Growth Issues consultation and engagement with town and parish councils in the autumn of 2010.

Having a policy is not enough, and the delivery of a mix of housing and housing supply in the district will be monitored to inform appropriate management actions if and when required. In addition, the site assessment and selection process that will be used in preparing the Site Allocations DPD will include a range of criteria appropriate to the size, location and constraints (including viability issues) of each site.

### **Gypsies and Travellers**

Nationally and in East Anglia Gypsy and Traveller communities are amongst the most deprived groups with poor access to accommodation, health, education, employment and other opportunities. Gypsies, Travellers and Travelling Showpeople have their own specific accommodation needs and the Council is required to address these needs. Although a local research study (the Suffolk Cross-Boundary Gypsy and Traveller Accommodation Assessment 2007) indicated that there are very limited

accommodation needs for Gypsies and Travellers within the Babergh District, there are identified shortages of authorised permanent and transit sites.

Babergh will work with Gypsy and Traveller communities, and with neighbouring authorities to meet identified local need for permanent and transit pitches as appropriate.

#### **Policy C14: Mix and Types of Dwellings**

**All new housing developments will be expected to comply with other relevant policies in this Core Strategy, particularly Policy CS10, and to contribute towards providing a mix of dwelling types and sizes to provide for the accommodation needs of the whole population of Babergh district, including those of vulnerable groups (such as the elderly and those with special needs), where such local needs exist, and at a scale appropriate to the size of the development.**

**The mix, type and size of the housing development proposed on all sites will be expected to reflect established needs in the Babergh district.**

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

**New pitches will be provided at an appropriate level and in suitable locations to meet the identified needs of Gypsies and Travellers in the district. The preferred approach to any provision necessary is to be through major developments or through small, rural exceptions sites, depending upon whether the identified need is urban or rural in nature. Proposals will be assessed against the policies of this Core Strategy (particularly Policy CS10) and relevant policies of subsequent DPD(s).**

**Note:** 'strategic housing sites' are the largest allocations in the Babergh Local Plan Alteration No.2 that remain undeveloped, together with the larger sites that will be allocated in the BDF. This will include site allocation policies that will set out the requirements for the development, including any specific accommodation needs that have been identified through evidence based studies (such as the Housing Needs Survey /Strategic Housing Market Assessment). 'Accommodation needs' include the need for appropriately designed market housing as well as a mix of social housing sizes and types designed to meet the affordable housing policy targets.

#### **Affordable Homes**

The delivery of affordable housing is identified as a key national planning objective (PPS1 and PPS3) and delivering affordable housing will help to create mixed and balanced communities. It will also 'widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need'.

Affordable housing is a key priority in Babergh. The Council has a good track record in affordable housing delivery and has used a variety of effective approaches to deliver affordable housing in the past including planning obligations, rural exception sites and through Council owned land. However income in relation to house prices continues to mean that affordability in the district remains a problem, as emphasised in the most recent local assessments (the Strategic Housing Market Assessment 2009, the Housing Needs Survey 2008, and the Annual Monitoring Report 2008-09).

There is a substantial need for affordable housing in the district and it is expected to remain as such for the Plan period. It is suggested that this need would not be addressed by predicted supply. Whilst it is necessary to deliver as much affordable housing as possible, a realistic and achievable target has to be set (as required by national policy in PPS3). Local evidence suggests that, based on viability and housing needs across the district, there is scope to remove site size thresholds to increase affordable housing delivery. The evidence also suggests that the current affordable housing requirements of 35% would still be an appropriate target for the plan period.

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

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

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

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

Provision of affordable housing in new developments will be determined on a site-by-site basis by considerations such as location, site circumstances and viability, and will be expected to be delivered on site. Where the proposed development is for one dwelling only, and in other exceptional circumstances where affordable housing cannot be provided on site, a commuted sum will be required. The delivery of affordable housing and housing supply in the district will be monitored and this will inform appropriate management actions if and when required.

## **Affordable Homes Delivery Target**

The Council will keep its affordable housing needs and associated evidence (such as that on financial viability) under review, updating it as necessary. Having regard to the available evidence of need, market conditions and other factors, it is considered difficult to stipulate an affordable housing delivery target for the whole 20-year lifespan of the Core Strategy to 2031. This is also because the level of need and nature of markets / financial viability are dynamic and the evidence has to be up-to-date.

Another key factor is that the Council's own actions and interventions are so critical in determining the numbers of units provided, particularly given the circumstances of Babergh not being a high housing growth area. It is therefore considered that an appropriate target is best set for the first 5 years of the Core Strategy period and that this should be determined by our own plans, projections and proposed actions.

Accordingly, Babergh has determined an affordable housing delivery programme target of 500 new units within the 5-year period from 2008-2009 to 2013-4 (100 per year on average). This annual figure (100) is also provided as an indicative level for the Plan period beyond 2013-4. This figure may be reviewed and revised as circumstances change and in particular, if they become more favourable towards affordable homes delivery. This has been set at a level that we feel will make the most substantial impact that we can, yet is also realistic and achievable. This level also has regard to the overall proposed level of new homes provision (300 per year). Providing the right kind of new homes, including affordability, is fundamental to the overall strategy of this Plan. It has been necessary to change the Plan's approach and policies so that they are oriented to meet this target level of new provision. Babergh's Strategic Plan priority theme of delivering quality homes that local people can afford (to buy or rent) demonstrates the Council's sustained corporate commitment towards this objective.

## **Rural Affordable Housing**

Traditionally, rural affordable housing has largely been brought forward through the use of a rural exceptions affordable housing policy. Rural exception sites are defined in government guidance and may only be used to provide affordable housing in perpetuity that meets local housing need. Evidence shows that there will continue to be a need for affordable housing in rural settlements.

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

In any event, development for rural affordable housing needs to be "local", that is it should relate well to the population from which the need arises. Because the functional cluster approach that has informed our settlement pattern and growth and distribution policies is based on the day-to-day connections – the practical real-life experience of Babergh village residents, it should have an important role to play in

focussing site selection for rural affordable housing. By identifying core villages and their clusters it widens the opportunity for local needs to be met on land or within schemes being developed at other, more sustainable locations within a cluster. Some rural settlements may be very small and/or scattered, and where it is not possible to identify a rural exception site within that settlement the need could be met in a nearby Hinterland or Core Village within that cluster or clusters (in the case of settlements where the 'boundaries' of the clusters overlap). This way of defining 'local' also helps to give a clearer framework when considering affordable housing schemes that rely for their funding through commuted payments.

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

### **Policy CS 15: Affordable Housing**

**In order to promote achievement of Babergh's medium-term target of 500 new affordable homes by 2015-6 (and thereafter its revised target) all residential development will be required to provide a minimum of 35% affordable housing. Individual targets may be set for New Directions of Growth and in Core Villages in Area Action Plan and Site Allocation DPDs.**

**Where the proposed development is for a single dwelling, and where affordable housing cannot be provided on site, a commuted sum will be required. The tenure types, mixes and sizes of affordable housing will reflect established needs in the District. Where proven, issues of development viability and tenure mix will be considered to determine appropriate affordable housing requirements on site or appropriate levels of commuted sums.**

### **Policy CS 16: Rural Exception Sites**

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

- **the development complies with other relevant policies in the Core Strategy, particularly Policy CS10;**
- **the proposed development by virtue of its size, scale and type will not exceed the identified local need (including need identified in other settlements within the same *or adjacent /adjoining* functional cluster);**
- **the type of dwellings to be provided are consistent with the needs identified by the housing needs survey and agreed in advance by the District Council; and where**

- **the proposed development is appropriate to the size/scale and character of the village, and is acceptable in terms of other detailed considerations such as site location and circumstances, design, layout, materials, landscaping, biodiversity, impacts on the countryside, amenity, and access, etc.**

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

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

### **3.3 Implementation**

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

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

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

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

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

#### **Infrastructure Delivery Strategy**

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

- utilities
- transport – roads, rail, footpaths, cycleways
- social
- community ,
- educational – schools, nurseries
- recreational – play areas
- green areas

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

investors. Thus the provision of satisfactory infrastructure involves other parties apart from the Council.

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

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

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

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

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

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

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

## Delivery and Monitoring Framework

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

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

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

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

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

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

- **Status-** illustrates the extent to which the outcomes of the policy are essential to the delivery of the objectives of this and wider aspects of the Core Strategy. In terms of the Strategic Sites / New Directions of Growth, this is indicated in respect of the infrastructure requirements based on the following;
  - **Critical (C)-** Infrastructure which is fundamental for the development to built, without which the site would be undevelopable.
  - **Required (R)** Infrastructure that has been identified as being required by stakeholders to provide the expected level of service to the occupiers of the new development.
  - **Desirable (D)-** Infrastructure provision which will make the development more attractive and without which, may not achieve the comprehensive sustainable development intended.
  
- **Indicators of Success-** This identifies the key factors / indicators which will demonstrate whether the Core Strategy Policy is operating successfully. The main process for this will be through the Annual Monitoring Report which the Council are required to prepare and publish each year. The table in Appendix xx does not repeat the indicators within this, but highlights the key factors which may suggest success or failure in delivering the policy outcomes.

## Monitoring

To ensure that the Core Strategy is implemented effectively it is essential that it is monitored and managed. The monitoring framework for the Babergh Core Strategy is set out in the Annual Monitoring Report. This expands on the targets, indicators and contingencies for the monitoring process.

Put simply, monitoring is required to check whether the Core Strategy is doing what it says it will and, if not, what action is appropriate to change this. If the Core Strategy is to be effective it must be:

- Clear about how the settlement strategy, core policies and necessary new infrastructure will be delivered, when and by whom?
- Flexible enough to cope with changing circumstances, but also have the ability to cope with uncertainties;
- Include clear arrangements for monitoring, so that progress towards delivering the stated outcomes can be assessed and if appropriate redressed.

The monitoring framework, identified in detail in the AMR is a detailed schedule. It is helpful to identify broadly what the critical elements are for monitoring purposes and to establish the critical risks. It is not possible to identify all risks, but those which are considered to have the potential to have most impact on delivery are summarised in the table in Appendix 3 together with identified flexibilities / contingencies.

Each year the Annual Monitoring Report will indicate progress on the targets and indicators identified in the Core Strategy. Where policies or targets are not being met, or are causing unintended impacts, reasons will be examined and remedial action may be triggered if necessary.

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

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

Policy CS 18 provides the context / commitment to this "monitor and manage" approach.

### **Policy CS17: Infrastructure Provision**

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

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

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

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

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

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

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

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

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

### **Policy CS 18: Monitoring**

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

**Any critical shortfalls or damaging unintended impacts will be addressed through management and review as set out in the Annual Monitoring Report, this will include reviewing impacts on the European sites, as required by the Habitats Regulations.**

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

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

**The results of this monitoring will be taken into account in the implementation of the Core Strategy, in informing other Development Planning Documents, including Development Management Policies and will provide evidence for any future reviews of all or any part of this CS.**

## APPENDIX 1

### Local Plan Policies to be Replaced by the Babergh Core Strategy

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

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

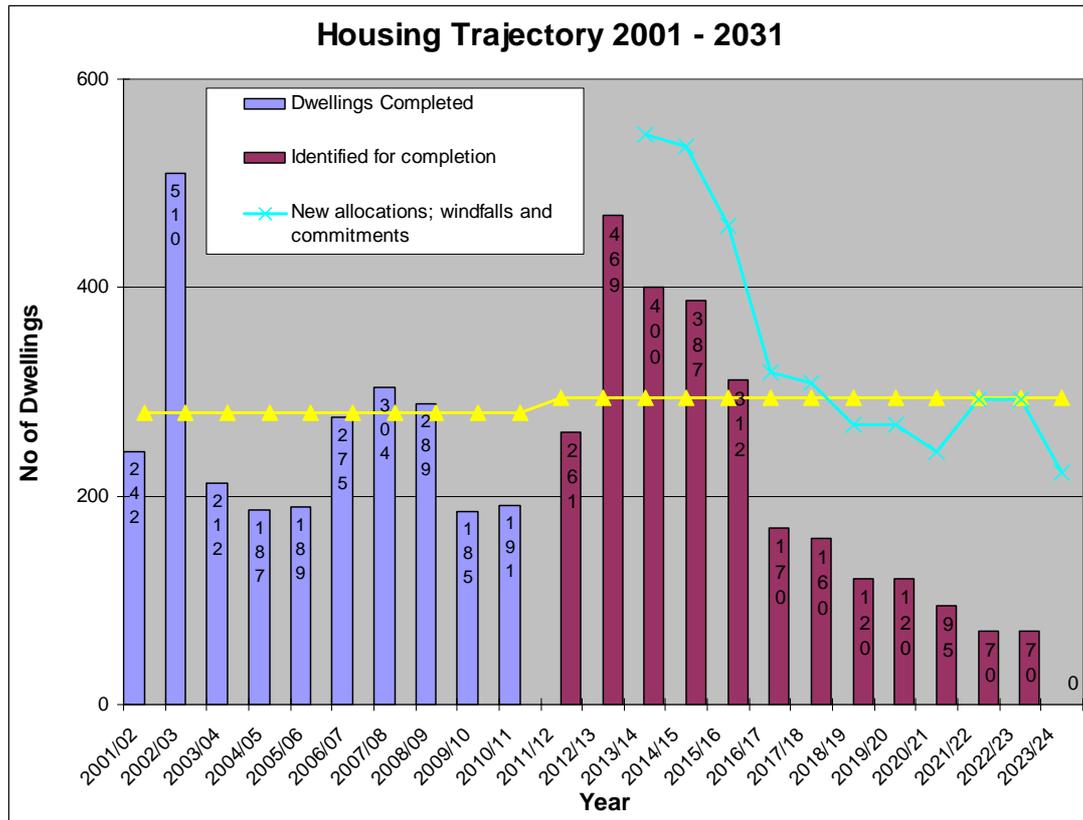
2. The Council has assessed the Local Plan policies (saved policies) to determine which of these policies will be superseded by the policies in the Core Strategy. The table below indicates which of the Local Plan policies will be replaced by Core Strategy policies. Local Plan policies not replaced by Core Strategy policies will remain until these are replaced by subsequent Development Plan Document policies.

<b>Local Plan Policy Ref</b>	<b>Policy Subject</b>
LP01	Planning Obligations
EN02 & EN04	Species and Biodiversity Action Plan
EN06	Habitat Creation
EN09	Conservation of Energy
EN10	Renewable Energy
EN13	Water Conservation
EN21	Provision of storage/recycling facilities
HS01	Towns
HS02	Villages
HS03	Non-sustainable and Sustainable Villages
HS04	Countryside
HS06 & HS07	Rural Exception – Local Needs Housing
HS08	Affordable Housing
HS09	Affordable Housing
HS26	Ipswich Policy Area
HS27	Housing Density and House Type
HS29	Residential Caravans
HS30	Design of New Housing
HS34	Smaller Dwellings
EM01	General
CR01	Landscape Quality
CR20	Protecting Existing Village Facilities
RE01	Sports Facilities
RE02	New Playing Fields
TP01	Pedestrians
TP02	Public Right of Way
TP03	Provision of Cycle Routes

**Housing Trajectory**

The Core Strategy sets a local target of 294 dwellings per annum in the District. The total completions for Babergh during 2001 - 2011, projected identified completions, and the sum of new allocations, windfalls and commits are shown in the figure below.

The trajectory will be updated in the Annual Monitoring Report. These figures will indicate if housing delivery in the district needs to be managed and if it is necessary to review housing policies in the Babergh Development Framework.



### Appendix 3

#### Delivery and Monitoring Framework

#### Core Strategy- Delivery, Infrastructure, Implementation and Monitoring.

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>Policy CS 1 : Settlement Pattern Policy</b>		
<b>What</b> Infrastructure / requirements needed to support development to successfully implement the CS policy	Delivery of appropriate mix of jobs and homes at the right place and at the right time.	Sites come forward for development in locations and of a scale which accords with the Settlement Pattern.  Urban extensions come forward during the plan period  Urban regeneration and renewal is facilitated in Brantham and on the Strategic employment sites during the plan period.
<b>How</b> Implementation Mechanisms / measures for delivery	Core Strategy Policies 2, 4, 5, 6, 7, 8, 9, 10, 13, 14, 15, 16 and 17.	
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developers BDC Infrastructure Providers SCC	
<b>Who or what else</b> Third Party Dependencies	Successful and timely progression of later DPDs including Site Allocations and Development Management Policies.  Other partners approach through their strategies and investment plans.	
<b>What may happen</b> Risks / unplanned events	Development which complies with the strategy does not come forward due to constraints, market, viability or other issues.	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Close, collaborative work with landowners, developers and other partners  Review Core Strategy	
<b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner	Ongoing throughout plan period	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Critical	
<b>Policy CS 2: Strategy For Development and Distribution of growth</b>		
<b>What</b> Infrastructure / requirements needed to support development to successfully implement the CS policy	Provision of an appropriate level of growth in sustainable locations providing for 9700 jobs and 2500 homes by 2031. These will mainly be as mixed use development on the edge of the urban areas, but also in the core and hinterland villages to ensure the communities in the rural areas are sustained by allowing for an appropriate level of growth.	2500 new homes are delivered during the plan period throughout the district in accordance with the Strategy.  9700 new jobs are delivered during the plan period throughout the district in accordance with the Strategy.
<b>How</b> Implementation Mechanisms / measures for delivery	Core Strategy policies 1, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16 and 17.	Deliver mixed and balanced communities through mixed use, urban extensions providing a mix of housing types and sizes supported by adequate infrastructure

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developers BDC Infrastructure Providers SCC	
<b>Who or what else</b> Third Party Dependencies	Successful and timely progression of later DPDs including Site allocations and Development Management Policies.  Other partners approach through their strategies and investment plans.	
<b>What may happen</b> Risks / unplanned events	Land is not released for development  Constraints / viability issues hinder development coming forward	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Close, collaborative work with landowners, developers and other partners  Flexible approach in Policies CS4 and CS5 to allow for close monitoring of progress during the plan period and advance development if required.  Policy CS7 allows for flexible approach for development within the “functional clusters” of the core and hinterland villages.  Review Core Strategy	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>When</b> Timescale for Delivery- usually the end of the plan period, but some actions / requirements will be sooner	Ongoing throughout the plan period with trigger points if development not progressing in the early part of the plan period, particularly in Sudbury	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Critical	
<b>Policy CS 3 Strategy for Sudbury and Great Cornard</b>		
<b>What</b> Infrastructure / requirements needed to support development to successfully implement the CS policy.  (C) – Critical (R) – Required (D) - Desirable	<b>All Development in Sudbury and Great Cornard</b> <ul style="list-style-type: none"> <li>• Transport infrastructure – Improve traffic movement around the gyratory in particular A134/ B1508/ King Street, others from Transport study. (R)</li> </ul> <b>To Support development at Chilton</b> <ul style="list-style-type: none"> <li>• Traffic Impact Works (C)</li> <li>• Off-site Highway Improvements (C)</li> <li>• Water supply networks and waste water (foul) infrastructure / treatment upgrades (C)</li> <li>• Public Transport provision – service pump priming (C)</li> <li>• New Primary School (R)</li> <li>• Green Infrastructure – Play Areas, Sports Fields, Strategic Landscaping and Wildlife provision ( R)</li> </ul>	<p>The required infrastructure improvements are delivered as informed by the Sudbury Traffic Management Study</p> <p>The development at Chilton comes forward during the early to mid plan period supported by adequate infrastructure</p> <p>The development delivered establishes a mixed and balanced community and is delivered sustainably.</p> <p>Development is delivered in a way which protects and enhances the local character.</p>

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	<ul style="list-style-type: none"> <li>• Social/Community Infrastructure – Neighbourhood shops, Health Centre, Community Hall (R )</li> <li>• Water supply networks and waste water (foul) upgrades (C )</li> <li>• Other ? (?)</li> </ul> <p><b><u>To Support development at the New Direction of Growth Sudbury</u></b></p> <ul style="list-style-type: none"> <li>• Traffic Impact Works as required(C)</li> <li>• Off-site Highway Improvements as required (C)</li> <li>• Water supply networks and waste water (foul) infrastructure / treatment upgrades (C )</li> <li>• Adequate education provision – secondary education within the catchment of Great Cornard Upper School which following SOR is likely to be near capacity. (R )</li> <li>• Public Transport provision – service pump priming (R )</li> <li>• Health provision- reviewed depending on outcome location and extent of planned provision through new facility in Sudbury (health Centre) (R )</li> </ul>	<p>Development of the New Direction of growth comes forward towards the end of the plan period, after Chilton has commenced, or following the trigger date <b>2016</b></p> <p>Development is delivered in a way which protects and enhances the local character.</p> <p>Development is supported by the appropriate infrastructure to ensure that it establishes a mixed and balanced community and is delivered sustainably.</p> <p>Any identified impacts under the HRA are adequately mitigated against</p>

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	<ul style="list-style-type: none"> <li>• Green Infrastructure including, Strategic Landscaping and Wildlife provision. Including amphibian habitat creation to support wildlife interest on the site. Measures to reflect HRA requirements (R)</li> <li>• Play Areas, Sports Fields (R)</li> <li>• Social/Community Infrastructure – Neighbourhood shops, Community Hall</li> <li>• Improvements to pedestrian and cycle access to Sudbury town centre and railway station (D)</li> </ul>	
<p><b>How</b> Implementation Mechanisms / measures for delivery</p>	<p>Developer contributions and CIL when finalised/ planning obligations / Section 106 agreements until then.</p> <p>Core Strategy Policies Other Development Planning Documents Corporate Strategies LTP Delivery Body Plans and Priorities</p>	
<p><b>Who</b> Delivery Body / Partners responsibilities for delivery</p>	<p>Highways Agency Developer Anglian Water SCC Transport operators Babergh District Council/ Parish / Town Councils Utility Companies</p>	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>Who or what else</b> Third Party Dependencies	Good Master planning approach Sport / recreation clubs/ organisations / Wildlife Trusts/ or similar organisations	Monitoring through the AMR establishes the need to trigger the New Direction of Growth in advance of Chilton commencing.
<b>What may happen</b> Risks / unplanned events	<ul style="list-style-type: none"> <li>• Development at Chilton may not come forward in early part of plan period.</li> <li>• Viability issues may influence the infrastructure provision on some sites</li> <li>• Development may not come forward in the early part of the plan period</li> </ul>	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	<ul style="list-style-type: none"> <li>• Policy CS 3 provides a trigger at 2016 to review progress and if development has not commenced at Chilton, to allow the New direction of growth to come forward sooner.</li> <li>• Developer contributions will help ensure adequate infrastructure is provided to support development on the strategic sites and by financial contributions on smaller sites.</li> <li>• Work alongside developers and landowners to facilitate development</li> <li>• Ongoing monitoring of the housing and employment land development</li> <li>• Overall flexible approach towards development.</li> </ul>	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	<ul style="list-style-type: none"> <li>Review of the Core Strategy</li> </ul>	
<p><b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner</p>	<p><b>All Sudbury and Great Cornard</b> Ongoing throughout plan period</p> <p><b>Chilton</b> Early to medium term</p> <p><b>New Direction of Growth</b> After 2016 - 2026</p>	
<b>Policy CS 4: Strategy for Hadleigh</b>		
<p><b>What</b> Infrastructure / requirements needed to support development to successfully implement the CS policy (C) – Critical (R) – Required (D) - Desirable</p>	<p><b>To Support all development in Hadleigh</b></p> <ul style="list-style-type: none"> <li>Transport infrastructure as required</li> <li>Any specific utility infrastructure as required</li> </ul> <p><b>To support development at the New Direction of Growth east of Hadleigh (1)</b></p> <ul style="list-style-type: none"> <li>Traffic Impact Works</li> <li>Improvement to junction at Frog Hall Lane roundabout (C)</li> <li>Off-site Highway Improvements (C)</li> <li>Water supply networks- infrastructure and / or treatment (C)</li> <li>Wastewater networks- infrastructure and / or treatment (C)</li> <li>Public Transport provision – service pump priming (R)</li> </ul>	<p>The required infrastructure improvements are delivered.</p> <p>The development at the New Direction of Growth comes forward during the plan period supported by adequate infrastructure</p> <p>The development delivered establishes a mixed and balanced community and is delivered sustainably.</p> <p>Development is delivered in a way which protects and enhances the local character.</p>

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	<ul style="list-style-type: none"> <li>• Green Infrastructure Strategic Landscaping and Wildlife provision. habitat retention/ creation to support wildlife interest on the site, including great crested newts. Including Measures to reflect HRA requirements (R)</li> <li>• Play Areas, Sports Fields, Strategic Landscaping and Wildlife provision. (R)</li> <li>• Social/Community Infrastructure – Neighbourhood shops/ Community Hall (R)</li> <li>• Health Centre,- currently is a floorspace deficit additional provision is required (R)</li> <li>• Improvements to pedestrian and cycle access to Hadleigh town centre (R)</li> </ul>	Any identified impacts under the HRA are adequately mitigated against
<p><b>How</b> Implementation Mechanisms / measures for delivery</p>	<p>Developer contributions and CIL when finalised / planning obligations / Section 106 agreements until then.</p> <p>Core Strategy Policies Other Development Planning Documents Corporate Strategies Delivery Body Plans and Priorities</p>	
<p><b>Who</b> Delivery Body / Partners responsibilities for delivery</p>	<p>Highways Agency Developer Anglian Water SCC</p>	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	Transport operators Babergh District Council/ Parish / Town Councils Utility Companies	
<b>Who or what else</b> Third Party Dependencies	Sport / recreation clubs/ organisations / Wildlife Trusts/ or similar organisations	
<b>What may happen</b> Risks / unplanned events	Viability issues may influence the infrastructure provision on some sites  Development may not come forward in the early part of the plan period	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Developer contributions will help ensure adequate infrastructure is provided to support development on the strategic sites and by financial contributions on smaller sites.  Work alongside developers and landowners to facilitate development  Ongoing monitoring of the housing and employment land development  Overall flexible approach towards development.  Review of the Core Strategy	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<p><b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner</p>	<p><b>All of Hadleigh</b> Ongoing</p> <p><b>New Direction of Growth east of Hadleigh</b> Medium – long term</p>	
<b>Policy CS 5: Strategy for Growth in Babergh’s Ipswich Fringe</b>		
<p><b>What</b> Infrastructure needed to support development to successfully implement the CS policy</p>	<p><b>New Direction of Growth</b></p> <ul style="list-style-type: none"> <li>• Traffic Impact Works</li> <li>• Off-site Highway Improvements</li> <li>• Public Transport provision – service pump priming</li> <li>• Primary School provision if development exceeds current capacity</li> <li>• Green Infrastructure. Strategic Landscaping and Wildlife provision. Habitat retention/ creation to support wildlife interest on the site. . Including Measures to reflect HRA requirements. The nature of this site requires Green Infrastructure to be a central focus to any development on this site. (C)</li> <li>• Play Areas, Sports Fields, Strategic Landscaping and Wildlife provision</li> <li>• Social/Community Infrastructure – Neighbourhood shops, Health Centre, Community Hall</li> </ul>	<p>The required infrastructure improvements are delivered.</p> <p>The development at the New Direction of Growth comes forward during the plan period supported by adequate infrastructure</p> <p>The development delivered establishes a mixed and balanced community and is delivered sustainably.</p> <p>Development is delivered in a way which protects and enhances the local character.</p> <p>Green Infrastructure is central to the design and layout of the scheme delivered, respecting the importance of this for the site and its proximity to the internationally sensitive site - Stour and Orwell Estuaries.</p>

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>How</b> Implementation Mechanisms / measures for delivery	Developer contributions and CIL when finalised / planning obligations / Section 106 agreements until then.  Core Strategy Policies Other Development Planning Documents Corporate Strategies Delivery Body Plans and Priorities	Any identified impacts under the HRA are adequately mitigated against
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Highways Agency Developer Anglian Water SCC Transport operators Babergh District Council/ Parish / Town Councils Utility Companies	
<b>Who or what else</b> Third Party Dependencies	Good Master Planning approach Sport / recreation clubs/ organisations / Wildlife Trusts/ or similar organisations	
<b>What may happen</b> Risks / unplanned events	Viability issues may influence the infrastructure provision on some sites  Development may not come forward in the early part of the plan period	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Developer contributions will help ensure adequate infrastructure is provided to support development on the strategic sites and by financial contributions on smaller sites.	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	<p>Work alongside developers and landowners to facilitate development</p> <p>Ongoing monitoring of the housing and employment land development</p> <p>Overall flexible approach towards development.</p> <p>Review of the Core Strategy</p>	
<p><b>When</b> Timescale for Delivery- usually the end of the plan period, but some actions / requirements will be sooner</p>	<p><b>New Direction of Growth</b> Mid to end of plan period</p>	
<p><b>Policy CS 6: Criteria for Development in Core and Hinterland villages</b></p>		
<p><b>What</b> Infrastructure / required needed to support development to successfully implement the CS policy (C) – Critical (R) – Required (D) - Desirable</p>	<p><b>To support all development in Core and hinterland villages</b></p> <ul style="list-style-type: none"> <li>• Green Infrastructure. Strategic Landscaping and Wildlife provision. habitat retention/ creation to support wildlife interest on the site. . Including Measures to reflect HRA requirements (C)</li> </ul>	<p>Development of sites for housing and employment are delivered in the Core and Hinterland villages at a scale and character appropriate to the settlement</p> <p>The functional clusters defined, continue reflect the identified cluster groups and retain their intended function and policy application allows for the intended flexibilities</p>

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	<ul style="list-style-type: none"> <li>• Environmental / biodiversity protection and enhancement, including any requirements under HRA recommendations. (C)</li> <li>• Landscaping / wildlife provision (R)</li> <li>• Highway Improvements (R)</li> <li>• Integration with local road network (R)</li> <li>• Public transport provision (R)</li> <li>• Open space / recreation facilities (R)</li> <li>• Other community infrastructure??</li> <li>•</li> </ul> <p>Protection of existing social and community facilities.</p> <p><b>To support development in Brantham</b></p> <ul style="list-style-type: none"> <li>• Remedial work for land contamination (C)</li> <li>• Mitigation required in response to FRA (C)</li> </ul> <p><b>Any other key requirements location / area specific as required</b></p>	<p>Services in the villages are retained or strengthened.</p> <p>Adequate infrastructure supports development delivered</p> <p>Any required mitigation measures are delivered.</p> <p>Regeneration of the site at Brantham is facilitated and a scheme providing for a mixed and balanced community delivering sustainable development is developed during the plan period.</p>
<p><b>How</b> Implementation Mechanisms / measures for delivery</p>	<p>Developer contributions and CIL when finalised / planning obligations / Section 106 agreements until then. Core Strategy Policies 4,5,6, 7, 11 and 18. BDC Corporate Plan, Parish and Town Councils and community groups</p>	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	Other Development Planning Documents Delivery Body Plans and Priorities	
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developer contributions and CIL when finalised / planning obligations / Section 106 agreements until then.  BDC Parish and Town Councils and community groups. Infrastructure providers Developer Highways Agency Environment Agency Parish / Town Councils SCC Anglian Water Utility companies	
<b>Who or what else</b> Third Party Dependencies	Good master planning approach. Co-operation of Parish and Town Councils and community organizations within neighbourhoods to manage control some social and community facilities  Sport / recreation clubs/ organisations / Wildlife Trusts/ or similar organisations	
<b>What may happen</b> Risks / unplanned events	<b>All development in core and hinterland villages</b> <ul style="list-style-type: none"> <li>• land does not come forward for development</li> </ul>	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	<ul style="list-style-type: none"> <li>• land values influence viability and the nature of schemes which could be developed.</li> <li>• Preparation of other DPDs including Development Management Policies and Master plans delivery delayed.</li> <li>• Viability of schemes does not allow for adequate provision of all the required social and community facilities.</li> </ul> <p><b>Brantham</b> Contamination issues and flood risk mitigation may influence development and the nature of a viable scheme Extent of mitigation required affects viability of scheme, and/or failure to agree suitable management of the protected area.</p> <p><b>Other site specifics if relevant</b></p>	
<p><b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events</p>	<p>Close collaborative work with land owners and developers.</p> <p>Collaborative working with other infrastructure providers</p> <p>Collaborative working to ensure mitigation measures agreed and incorporated into Masterplan</p>	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	<p>Developer contributions will help ensure adequate infrastructure is provided to support development. Opportunities to pool contributions to provide “shared infrastructure” where appropriate and compliant.</p> <p>Work alongside developers and landowners to facilitate development</p> <p>Overall flexible approach towards development.</p> <p>Review of the Core Strategy</p>	
<p><b>When</b> Timescale for Delivery- usually the end of the plan period, but some actions / requirements will be sooner</p>	<p>On-going- throughout the plan period</p> <p><b>Brantham</b> Short – medium term</p>	
<b>Policy CS 7: Reducing Carbon Dioxide emissions</b>		
<p><b>What</b> Infrastructure / requirements needed to support development to successfully implement the CS policy</p>	<p>New development to come forward at sufficient standard to meet the Building for Life and BREEAM standards.</p>	<p>The number of residential schemes delivered which achieve the Building for Life Silver Standard</p>
<p><b>How</b> Implementation Mechanisms / measures for delivery</p>	<p>Standards and guidance established by the Building Research Establishment (BRE) and Design Council to be incorporated into design of schemes from the outset.</p>	<p>The number of non residential schemes that are delivered achieving BREEAM very good, or higher standard.</p>

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	Encourage facilities which contribute to a reduction in CO2 emissions including electric car charging points. Sensitive approach at development control stage	The identification of sites in later DPD(s) through site allocations where the standards can be achieved or exceeded
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developer BRE, Design Council BDC, Development Control / Building Control Services	
<b>Who or what else</b> Third Party Dependencies	BRE, Design Council changes in standards A proactive approach by BDC, Development Control / Building Control Services and partners	
<b>What may happen</b> Risks / unplanned events	Failure to secure sufficient level of design in schemes coming forward	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Monitor design standards, enhance education and information to applicants provide further guidance based on BRE and Design Council standards.	
<b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner	On-going throughout the plan period	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Required	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>Policy CS 8: Renewable energy</b>		
<b>What</b> Infrastructure needed to support development to successfully implement the CS policy	Strategic / large sites to use on site renewable energy sources. Low carbon initiatives as part of new developments on a smaller scale. Also include retro-fit existing buildings where appropriate.	A significant improvement in the energy efficiency of new and existing houses during the plan period  Number of schemes / initiatives delivered including retro-fitting  Over the plan period an increase in the proportion of energy generated from renewable sources
<b>How</b> Implementation Mechanisms / measures for delivery	Various sources of national guidance including PPS1.  Good design and early advice / discussions at development control process  Support from Development Management Polices and other DPDs including Site Allocations DPD.	
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developers BDC development control and building control services Infrastructure providers	
<b>Who or what else</b> Third Party Dependencies	A proactive approach by BDC, Development Control / Building Control Services and partners.	
<b>What may happen</b> Risks / unplanned events	Failure to secure sufficient level of design in schemes coming forward.	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	Delay in preparation of Development Management Polices and other DPDs including Site Allocations DPD.	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Advice and education regarding targets and requirements to ensure they are incorporated into schemes early on	
<b>When</b> Timescale for Delivery- usually the end of the plan period, but some actions / requirements will be sooner	On-going throughout the plan period	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Required	
<b>Policy CS 9: Green Infrastructure</b>		
<b>What</b> Infrastructure / requirements needed to support development / to successfully implement the CS policy.	<b>To support all development</b> Provision and enhancement of green infrastructure relative to growth pressures and in a form and location consistent with the Green Infrastructure evidence / framework for BDC and HGP and any mitigation requirements identified in the HRA.  Improved access to existing network of multi functional green spaces to create continuous green links, particularly close to concentrations of population.	The extent to which the strategic sites and larger sites establish Green Infrastructure as a core concept in Master Plans and when schemes are built out.  The number of additional green infrastructure sites offering multi functional opportunities

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	<p><b>Strategic Sites</b> Green infrastructure is to be a key consideration in the design of schemes from the outset, with a critical focus on this being required for the development of the new direction of growth in the Ipswich Fringe. Also to reflect any specific GI recommendations required by the HRA.</p>	<p>The number of new or extended links established to connect existing Green Infrastructure sites, particularly where these serve to divert users away from more sensitive locations.</p>
<p><b>How</b> Implementation Mechanisms / measures for delivery</p>	<p>Actions and opportunities identified in the Green Infrastructure evidence base / framework and the Opens Space Sport and recreation strategy.</p> <p>Requirements indicates by the HRA, to ensure protection of designated sites</p> <p>Haven Gateway Green Infrastructure Strategy and framework for Babergh</p> <p>Other partners and adjoining Authorities plans and strategies.</p>	
<p><b>Who</b> Delivery Body / Partners responsibilities for delivery</p>	<p>Developer Parish and Town Councils Haven Gateway Partnership BDC Wildlife trust or similar organizations English Nature</p>	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	AONB Adjoining Local Authorities	
<b>Who or what else</b> Third Party Dependencies	Comprehensive master planning approach Good design concepts respecting the role and function of GI and the opportunities beyond the site itself.  Organisations responsible for management of GI spaces including Parish and Town Councils and Conservation trusts etc	
<b>What may happen</b> Risks / unplanned events	Inadequate provision of GI is made due to competing requirements which may influence viability of development.	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Sensitive assessments may be required at development control stage.  Collaborative working with adjoining authorities, especially Ipswich regarding GI opportunities and requirements particularly associated with growth in the area of the Ipswich Fringe.  HRA and Green Infrastructure Framework / evidence inform early planning to ensure adequate provision of the right form, in the right place.	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner	Ongoing throughout the plan period	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	<b>New direction of Growth Ipswich Fringe-</b> Critical  <b>Other strategic sites</b> Required  <b>Core and Hinterland Villages</b> Required  <b>Brantham</b> Critical	
<b>Policy CS 10: Sustainable Development</b>		
<b>What</b> Infrastructure/ requirements needed to support development to successfully implement the CS policy	Development must respect the local context and character of the different parts of the district. All new development will be required to demonstrate the principles of sustainable development.	Development delivered positively contributes to the character and shape of its location and enhances the local character and features including landscape and historic environment
<b>How</b> Implementation Mechanisms / measures for delivery	Developer contributions and CIL when finalised / planning obligations / Section 106 agreements until then.  Core Strategy Policies	Infrastructure is provided to support development delivered as required  No loss of local services is created

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	<p>Development Management Policies and other DPDs. Other Delivery Plans and Strategies for infrastructure providers.</p> <p>National Planning Guidance</p>	<p>Positive contributions are made to biodiversity, climate change and Green Infrastructure through development delivered throughout the plan period.</p> <p>Development does not take place in areas at risk from flooding</p>
<p><b>Who</b> Delivery Body / Partners responsibilities for delivery</p>	<p>Developer Highways Agency Environment Agency Parish / Town Councils SCC Anglian Water Utility companies Community organizations Conservation / Wildlife Trusts or similar</p>	<p>Development is delivered using sustainable building methods</p> <p>Number of schemes incorporating SuDs Development delivered minimizes waste and surface water run-off .</p>
<p><b>Who or what else</b> Third Party Dependencies</p>	<p>Policy guidance and interpretation and good / consistent approach at development control stage. Development Management Policies and other DPDs to come forward to provide further guidance</p>	<p>Number of schemes using renewable sources of energy</p> <p>Development provides for opportunities to promote alternatives to the car for travel</p>
<p><b>What may happen</b> Risks / unplanned events</p>	<p>Delay in preparation of Development Management Policies and other DPDs</p>	<p>No damaging impacts are caused to the European sites and if necessary mitigation is carried out</p>
<p><b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events</p>	<p>Collaborative working with landowners and developers</p> <p>CIL / 106 to contribute towards infrastructure provision to ensure sustainable schemes are delivered. Review Core Strategy</p>	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner	Ongoing throughout the Core Strategy	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Required	
<b>Policy CS 11: Town, village and local centres</b>		
<b>What</b> Infrastructure / requirements needed to support development to successfully implement the CS policy	Sustain the main town, neighbourhood and local centres, through the protection of vitality and viability and opportunities to enhance facilities at an appropriate scale in acceptable locations.	Retention and enhancement of the vitality and viability of the town centres, including reduction in the number of vacant properties as indicated in the Annual Town Centre Health Checks for Sudbury and Hadleigh
<b>How</b> Implementation Mechanisms / measures for delivery	Assessment of proposals- guidance and compliance with PPS 4 or other relevant guidance. Implementation of Local Plan Policies Development Management Policies	A net gain in town centre uses permitted in the centres during the plan period
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developers Retail operators Town centre communities and partnerships	The number of new local centres established through the delivery of the urban extensions
<b>Who or what else</b> Third Party Dependencies	Viability and market trends and demands	
<b>What may happen</b> Risks / unplanned events	Schemes which protect or enhance the vitality and viability of the town centres and local centres do not come forward.	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	Unable to attract retail interest in the key locations in the centres	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Work closely with landowners and developers on new strategic sites to encourage appropriate retail provision in local centres if appropriate	
<b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner	Ongoing throughout the plan period	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Required	
<b>Policy CS 12: Local Economic Strategy</b>		
<b>What</b> Infrastructure/ requirements needed to support development to successfully implement the CS policy	To deliver job requirements in sustainable locations throughout the district	The number of new businesses and jobs created in the during the plan period
<b>How</b> Implementation Mechanisms / measures for delivery	Local Plan and Core Strategy policies. Site allocations and Development Management policies	Proportion of businesses representing the various employment sectors provided during the plan period

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developers Local Economic Partnership Adjoining Local Authorities HGP Infrastructure providers Suffolk County Council BDC	Delivery of employment on the strategic sites and the urban extensions during the plan period.
<b>Who or what else</b> Third Party Dependencies	Other partners taking a similar approach in their strategies and investment plans, including adjoining Local Authorities.  Progress to Development Management Policies and other DPDs including Site Allocations	
<b>What may happen</b> Risks / unplanned events	Failure to attract developers to the district Availability of employment skills and training Ability to facilitate the provision of infrastructure for the larger employment sites enabling them to come forward	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Phased approach to development Collaborative working with landowners and developers and master planning approach to encourage opportunities to bring sites forward at the right time, in the right place. Review of Core Strategy.	
<b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner	Ongoing throughout the plan period	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Critical	
<b>Policy CS 13: The Rural Economy</b>		
<b>What</b> Infrastructure / requirements needed to support development to successfully implement the CS policy	Opportunities to foster sustainable economic growth in the rural areas, particularly associated with rural character and key local and historic characteristics.	Number of new businesses established in the rural area during the plan period
<b>How</b> Implementation Mechanisms / measures for delivery	Core Strategy Policies in particularly CS11 Development Management Policies PPS 4 or other planning guidance	Number of Tourism / leisure initiatives delivered during the plan period to promote this sector of the economy
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developers Infrastructure providers Local Economic Partnerships HGP Town and Parish Councils	Number of diversification schemes delivered which contribute to the rural economy
<b>Who or what else</b> Third Party Dependencies	Innovative approach to development and sensitive approach at development control stage.	
<b>What may happen</b> Risks / unplanned events	Failure to attract appropriate development to the area Need to manage development opportunities with constraints often relevant to the rural areas.	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	Delay in preparation of Development Management Policies	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Proactive work through Economic Development and partnership approach encourage opportunities and promote interest where appropriate.  Rely on PPS 4 stance on policy guidance for the rural economy.	
<b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner	Ongoing throughout the plan period.	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Required	
Policy CS 14: Mix and Types of Dwellings		
<b>What</b> Infrastructure / requirements needed to support development to successfully implement the CS policy	Delivery of the appropriate size and type of homes to provide opportunities for all, in accordance with the identified local need.	Number of dwellings delivered throughout the district of the type and size which corresponds with the identified housing needs and social / age profile in various parts of the district during the plan period.
<b>How</b> Implementation Mechanisms / measures for delivery	Core Strategy Policies Development Management Policies Development Management Policies Site Allocations Document	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developers and Landowners BDC Infrastructure providers	Delivery of the right type of housing in the right place at the right time.
<b>Who or what else</b> Third Party Dependencies	Viability and market conditions Sensitive approach at development control stage, to ensure appropriate mix of dwellings provided.	
<b>What may happen</b> Risks / unplanned events	Sites not coming forward at appropriate time Market demand/ developer demand houses which don't match the local needs	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Collaborative working with developers Master planning approach on Larger site to enable early input to reflect needs etc. Review of the Core Strategy	
<b>When</b> Timescale for Delivery- usually the end of the plan period, but some actions / requirements will be sooner	Phased throughout the plan period on the larger strategic sites / new directions of growth.  Ongoing throughout the plan period elsewhere.	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Critical	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
Policy CS 15: Affordable Housing		
<b>What</b> Infrastructure / requirements needed to support development to successfully implement the CS policy	Provision of additional affordable housing to address the need throughout the district and in particular in locations where the need is highest.	_Number of schemes delivering 35% of affordable housing  Delivery of the right mix of tenure and type of affordable housing in accordance with the identified need.  Successful securing of financial contributions where provision is to be made off site  Flexible delivery and take up of affordable housing within the functional clusters.  Number of affordable housing units delivered during the plan period in relation to need and council wide targets
<b>How</b> Implementation Mechanisms / measures for delivery	Core Strategy Policies. Site Allocations DPD	
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developers BDC HCA ?? Housing Associations NHB Register Landlords	
<b>Who or what else</b> Third Party Dependencies	Site Allocations DPD	
<b>What may happen</b> Risks / unplanned events	Delay in preparation of the Site Allocations DPD. Viability constraints restrict the level of provision of Affordable Houses. Sites do not come forward for development	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Collaborative working with developers Master planning approach on Larger site to enable early input to reflect needs etc. Review of the Core Strategy	
<b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner	Phased throughout the plan period on the larger strategic sites / new directions of growth.  Ongoing throughout the plan period elsewhere.	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Required	
Policy CS 16: Rural Exception Sites		
<b>What</b> Infrastructure / requirements needed to support development to successfully implement the CS policy	Provision of affordable housing in the rural areas, well related to settlements and in a location which supports the function of the local community in that area.	Flexible delivery and take up of affordable housing within the functional clusters.
<b>How</b> Implementation Mechanisms / measures for delivery	Core Strategy Policies. Site Allocations DPD	Delivery of the right mix of tenure and type of affordable housing in accordance with the identified need.
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developers / developer contributions BDC HCA ?? Housing Associations Register Landlords ???	Number of affordable housing units delivered during the plan period in relation to need and council wide targets.
<b>Who or what else</b> Third Party Dependencies	Flexible application of policies to allow cluster / community approach to enhance opportunities to maximise provision.	
<b>What may happen</b> Risks / unplanned events	Sites are not released for rural exceptions sites because of aspirations for market housing on the site.	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Proactive approach to policy interpretation Planning and housing services	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>When</b> Timescale for Delivery- usually the end of the plan period, but some actions / requirements will be sooner	Ongoing throughout the plan period	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Required	
Policy CS 17: Infrastructure Provision		
<b>What</b> Infrastructure/ requirements needed to support development to successfully implement the CS policy	Provision of adequate infrastructure to support the delivery of development throughout the district, in the right place, and right time.	Delivery of adequate infrastructure provided to support development throughout the plan period.
<b>How</b> Implementation Mechanisms / measures for delivery	Developer contributions , Section 106 agreements until replaced by CIL- will allow for infrastructure provision or financial contributions. Opportunity to pool contributions towards some of the larger schemes where the infrastructure is mitigating impact of development over a wider area. Core Strategy Policies Site Allocations DPD Development Control DPD	
<b>Who</b> Delivery Body / Partners responsibilities for delivery	Developer Highways Agency Environment Agency Parish / Town Councils SCC	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
	Suffolk Primary Care Trust Anglian Water Infrastructure providers/ Utility companies Community organizations Conservation / Wildlife Trusts or similar	
<b>Who or what else</b> Third Party Dependencies	SPD to support Infrastructure provision. Other DPDs progression Other Partners Strategies and Investment Plans.	
<b>What may happen</b> Risks / unplanned events	Viability constraints Delay in preparation of the SPD and other DPDs	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Collaborative working with developers, partners and infrastructure providers. Master planning approach on the larger sites. Review the Core Strategy	
<b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner	Ongoing throughout the plan period  Phased in the Urban areas on the strategic sites	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Critical / required	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
Policy CS 18: Monitoring		
<b>What</b> Infrastructure/ requirements needed to support development to successfully implement the CS policy	Ensure robust monitoring is in place to review delivery progress of the Core Strategy and targets set within it, allow for a flexible approach and to bring forward contingencies where needed.	Continued monitoring published through the Annual Monitoring Report and information provided on the Council's web site.  Detailed indicators as required assessed in the AMR and remedial / contingency actions taken as required
<b>How</b> Implementation Mechanisms / measures for delivery	Annual Monitoring Report	
<b>Who</b> Delivery Body / Partners responsibilities for delivery	BDC Partners including adjoining authorities and infrastructure providers. Environmental Bodies including Natural England and AONB	
<b>Who or what else</b> Third Party Dependencies	Availability of updated data on performance on targets from a range of partners.	
<b>What may happen</b> Risks / unplanned events	Monitoring or response to contingencies delayed. Up to date information not available to inform monitoring process.	
<b>What if</b> Contingencies and Flexibilities to respond to risks or unplanned events	Phasing and triggers associated with the larger strategic sites. Annually through the AMR procedure as the key focus for monitoring. Work with partners collaboratively	

DELIVERY FACTOR/ CONSIDERATION	ACTION / REQUIREMENTS/ RESPONSIBILITY / LOCATION	Indicators of success
<b>When</b> Timescale for Delivery- usually throughout the plan period, but some actions / requirements will be sooner	Ongoing throughout the plan period, with AMR.	
<b>Status:</b> <ul style="list-style-type: none"> <li>• Critical</li> <li>• Required</li> <li>• Desirable</li> </ul>	Required.	

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## Appendix b

### Draft Programme for Submission Draft Core Strategy Consultation / Town & Parish Council / Stakeholder Workshops / Public Drop-in Sessions

Activity	Week commencing:																
	1/8	8/8	15/8	22/8	29/8	5/9	12/9	19/9	26/9	3/10	10/10	17/10	24/10	31/10	7/11	14/11	21/11
Strategy Committee																	
Council																	
Editing, Printing, Advertising, letters etc																	
Consultation period																	
Town & Parish council workshops and drop-ins													<i>Half term</i>	*			
Lead-in/prep; send out letters, invitations, & enclosures, Stat Notice																	

\*5<sup>th</sup> week – after half-term week if required.

- Same locations as Autumn 2010: Brantham, Pinewood, Bildeston, Acton + Hadleigh and Sudbury.
- If venues from last year are booked/not possible, try school in that village/location.
- Hadleigh and Sudbury try schools first and then alternative venues.

#### Preparation/lead-in period:

Letters  
 invitations  
 enclosures to go in letters (explaining process and who else is involved)  
 Core Strategy summary leaflet  
 Newsletter  
 Check date for next Babergh Matters

Check and prepare DP Online consultation system  
 Enlarged Clusters Map, Key Diagram, etc and a couple of boards of text  
 Facebook and Twitter  
 Press Release– check deadlines and press date(s)  
**Statutory Notice** – as per regs re pre-submission publicity requirements, adverts/notices etc.

## Workshops

- Same locations + 2 further workshops (Sudbury and Hadleigh)
- Similar format
- Wider audience

**Town and parish councils** – in addition to invitations to participate in the workshops, pre-consultation period letter similar to (and referring to) last year's September letter. Letter to suggest sending same parish reps as last year if possible, and that we will be inviting other others including local business reps, school and health centre, and possibly community groups.

## **Business representation to include a cross section of the business community in terms of sectors and location**

Business to include reps from tourism/leisure/hospitality + others

Chambers of commerce + representatives of location specific businesses

**Representative/community groups** - e.g. older people – find a representative group e.g. Age Concern, disabled – find a representative group, younger (20 – 50) adults –(eg mums & toddlers groups?, + W. I.)

**Health Centres/GP Practices** – specific invitations (Practice Manager?)

## **Schools**

Focus on individual schools

- 1) take part in workshops – write directly to school, rep. could be a teacher/member of staff, a governor or someone from the PTA (do we need different/separate letters?)
- 2) more interactive with students – need to find right member of staff and align with something on the curriculum (citizenship?) or school council?

**Daytime publicity/public engagement activities** – Consider publicity and awareness / promotion of consultation exercise in locations such as Hadleigh Co-op leaflet and display; Sudbury market day/St Peter's Church? Leaflets in shops and pubs?

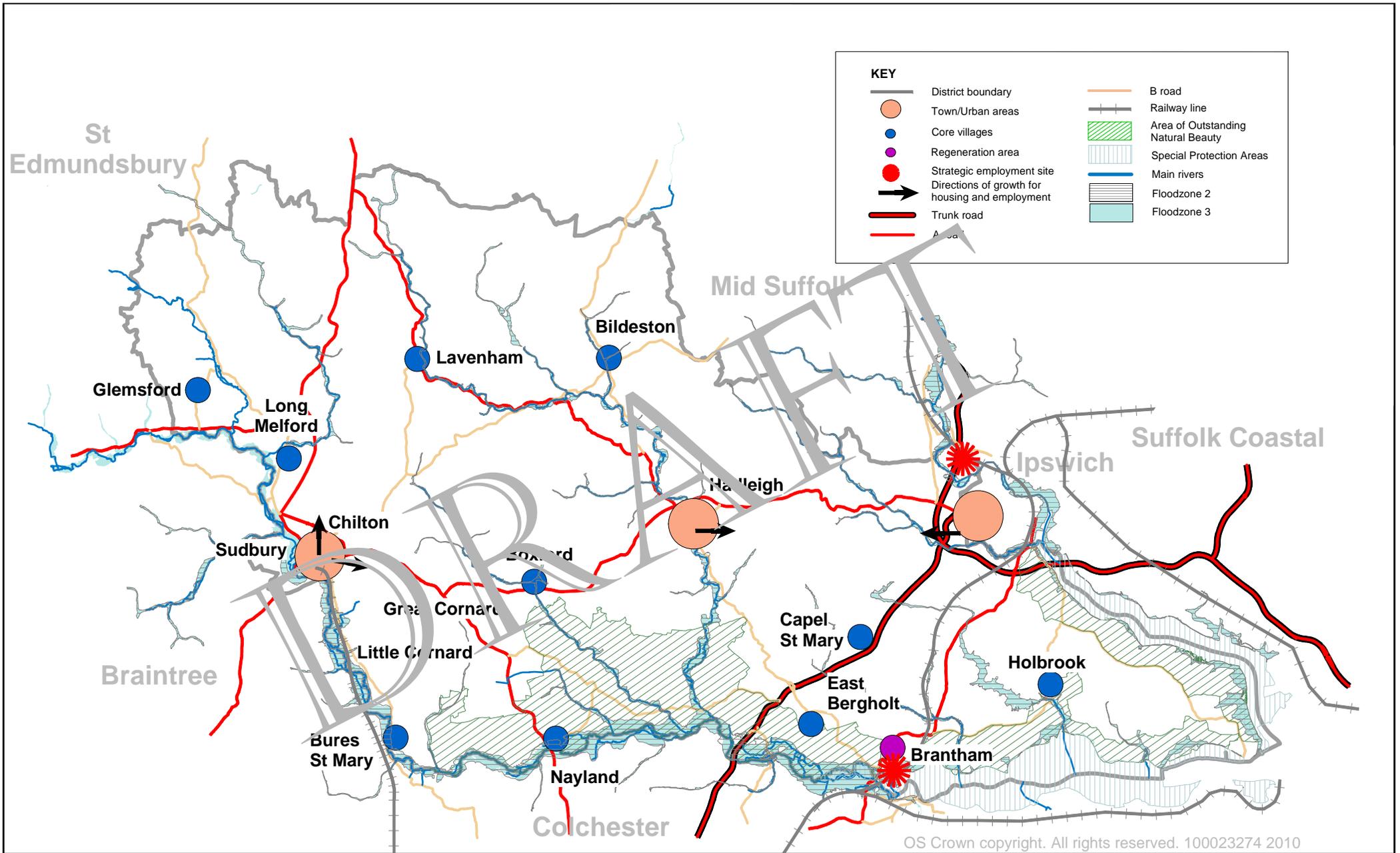
**Internal communication** –Early notice for Office Services and print room and advise on type and quantities of printing required and deadlines. **Seek help** with workshops and daytime public awareness-raising early including volunteers from other Babergh services, other LPAs again inc. SCC, and service providers.

JAW/SS 02 08 11

**Appendix c**

**Draft Key Diagram Babergh Core Strategy Submission Draft**

**(August 2011).**



# Babergh Key Diagram

