

## BABERGH DISTRICT COUNCIL

<b>From: Head of Economy</b>	<b>Report Number: P34</b>
<b>To: Strategy Committee</b>	<b>Date of meeting: 7 July 2014</b>

### **RURAL HOUSING POLICY AND CORE STRATEGY POLICY CS11 – SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

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

- 1.1 To consider the responses to consultation on the draft supplementary planning document (SPD) on rural housing policy and CS11, to approve amendments to the document and to approve adoption of the SPD subject to completion of the statutory procedures.

#### **2. Recommendations**

- 2.1 That this report and Appendix 1 (Summary of consultation responses) form the basis of the Public Consultation Statement.
- 2.2 That the proposed Rural Housing Policy and Core Strategy Policy CS11 – Supplementary Planning Document (SPD) – Appendix 2 to the report be adopted subject to:-
- the inclusion of any further amendments identified at the meeting as a result of either (a) further consultation responses reported in accordance with paragraph 8.3 of the report or (b) Members' deliberations at the meeting;
- and
- the Corporate Manager – Spatial Planning Policy being authorised in consultation with the Chairman of the Strategy Committee to finalise the SPD for publication in accordance with the relevant statutory procedures.

Further that the Corporate Manager be authorised to make such other minor amendments and corrections to the SPD as he considers necessary.

The Committee is able to resolve these matters.

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

- 3.1 The costs of the preparation of the SPD and consultation will be met from existing budgets.

#### **4. Risk Management**

- 4.1 This report is not linked with any of the Council's Corporate / Significant Business Risks.

#### **5. Consultations**

- 5.1 The consultation arrangements are set out in paras. 8.3 and 8.4 below.

## **6. Equality Analysis**

- 6.1 The effect of Policy CS11 and the SPD will be to increase the supply of both market and affordable housing in rural areas and improve accessibility to housing for all. It is not considered that there are any equality implications.

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

- 7.1 This issue is specific to Babergh DC as planning authority and there are no shared service/partnership implications.

## **8. Key Information**

- 8.1 Policy CS11 of the Core Strategy sets out a new and more flexible approach to housing provision in rural areas. It provides for proposals for development for Core Villages to be approved together with sites elsewhere where they satisfactorily address matters set out in the policy and score positively against criteria set out in Policy CS15. It also provides for development in hinterland villages to be approved where it meets certain criteria. Proposals are now coming forward for consideration under Policy CS11 and further guidance on the interpretation and application of the policy is considered necessary. This is intended to assist developers and landowners in identifying the types of site that may be considered under this policy and setting out the supporting information that will be required by the Council for a proposal to be considered. It is also intended to provide guidance to Parish Councils, local communities and the general public on how the Council will assess proposals submitted under this policy.
- 8.2 The SPD supports Strategic Priority 2 Housing - Shape, influence and provide the leadership to achieve the right mix and supply of housing.
- 8.3 The draft SPD was published for consultation on 21 May 2014 with a closing date for responses of 24 June 2014. All relevant people and organisations on the Council's LDF database were consulted. The consultation period was subsequently extended to 1 July 2014 for statutory consultees. This report includes all responses received at the time of writing (25 June 2014). An update on any additional responses received will be provided at the meeting.
- 8.4 The consultation took the form of a questionnaire asking respondents to comment on 8 specific points in the draft SPD. Respondents were also given the opportunity to make general comments on the SPD. A summary of the responses received to date in response to each question is attached at Appendix 1.
- 8.5 Following the consultation a number of amendments to the SPD are considered appropriate. An amended SPD with the proposed amendments highlighted is attached at Appendix 2.
- 8.6 It is proposed to adopt the revised guidance note as a supplementary planning document. This will give the document weight as a material planning consideration when planning applications are considered. The procedures for adoption are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. These require that before a local planning authority adopts a SPD it must prepare a statement setting out:
- The persons the local planning authority consulted when preparing the SPD

- A summary of the main issues raised by those persons
- How those issues have been addressed in the SPD.

The regulations require that this statement and the proposed SPD be placed on deposit for a minimum of 4 weeks for representations to be made.

- 8.7 It is therefore proposed that Appendix 1 should form the basis of the Public Consultation Statement and that Appendix 2 should be the proposed SPD.
- 8.8 The guidance will be kept under review as it is tested in practice and amendments may be required in future in the light of this experience.

**9. Appendices**

Title	Location
1. Summary of consultation responses	Attached
2. Proposed SPD (Draft brief plus recommended amendments)	Attached

**10. Background Documents**

- 10.1 None.

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**RURAL HOUSING POLICY AND CORE STRATEGY POLICY CS11 – SUPPLEMENTARY PLANNING DOCUMENT**

**SUMMARY OF RESPONSES TO CONSULTATION**

QUESTION	SUMMARY OF RESPONSES RECEIVED	OFFICER COMMENT
<p><b>Q1. Do you agree that the matters identified in paragraph 7 of the Draft SPD, which will act as the basis for assessing proposals, are relevant and appropriate?</b></p>	<p>Of those respondents that answered this question 66% agreed with the matters identified in the Draft SPD and 33% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> <li>- The extent of cumulative impacts need to be agreed with the LPA as developers will not have full knowledge of other proposals</li> <li>- There is no specific mention of the wider environment/countryside</li> <li>- Existing conditions need to be taken into account when considering cumulative impacts</li> <li>- Regard should be given to policies and guidance contained within an Neighbourhood Plan</li> <li>- Changes that have taken place in the recent past should be considered</li> <li>- CS11 and CS15 fail to deal properly with the main legislative provisions for planning and the historic environment</li> <li>- The SPD will make the process for justifying and assessing a proposal repetitive and onerous. The SPD fails to provide new guidance beyond the Core Strategy and the NPPF</li> <li>- A key element missing from para. 7 is the requirement to deliver development on brownfield land</li> <li>- There is no mention of the sustainability of any proposed developments and the need to demonstrate that they are sustainable</li> <li>- The guidance should consider the issue of proportionality i.e what might be appropriate for a multi-dwelling application may not be appropriate for a single application.</li> </ul>	<p>It is accepted that there will need to be liaison between the LPA and developers on assessing cumulative impacts. This can take place during the pre-application discussions that are referred to in para.18 of the document.</p> <p>The wider environment/countryside is included within constraints and impacts which are referred to in para.15 of the document</p> <p>It is accepted that existing conditions will be the baseline for assessing the impact of additional development.</p> <p>It is accepted that there should be a reference to taking account of Neighbourhood Plans where these have been prepared in</p>

		<p>accordance with the Core Strategy.</p> <p>Changes that have taken place in the recent past are relevant insofar as they might affect the ability of services and facilities to accommodate additional development. However the fact that a village may have experienced recent development is not, of itself, a reason for not considering further development</p> <p>CS11 and CS15 are part of the adopted Core Strategy which has been found sound by an independent Inspector and compliant with national policies and legislation.</p> <p>It is not accepted that the SPD provides no further guidance beyond the NPPF and the Core Strategy. It sets out further information on how the CS11 criteria will be applied and the evidence required to support applications.</p> <p>Sustainability issues and dealt with by Policy CS15.</p> <p>This is referred to in para. 6 of the document.</p>
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<p><b>Q2. Do you agree that the issues in relation to site location and relationship to settlement identified in paragraph 8 of the Draft SPD are relevant and appropriate?</b></p>	<p>Of those respondents that answered this question 69% agreed with the matters identified in the Draft SPD and 31% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> <li>- Density should be included in the third bullet point</li> <li>- The fifth bullet point relating to self-containment and logical boundaries should be clarified</li> <li>- Please see 50-001-20140306 of the NPPG which does not restrict housing development to the type of rural settlement</li> <li>- Where villages have taken development early in the lifecycle of the policy they should be safeguarded by removing pressure to take further development in future years</li> <li>- Brownfield sites should be considered before greenfield sites</li> <li>- Locations adjoining the BUAB are not necessarily preferable to other locations outside the BUAB</li> </ul>	<p>Agree that density should be added to third bullet point</p> <p>It is considered that self-containment and natural boundaries and self-explanatory</p> <p>Policy CS11 relates to Core and Hinterland Villages. It does not restrict housing development in other villages. These are covered by other policies in the Core Strategy.</p> <p>The level of development that has taken place in a village is relevant insofar as it may affect the capacity of services and facilities to accommodate development.</p>

		<p>It is not possible to give safeguards to prevent development in future years. The availability of brownfield sites would be considered as part of the sequential approach referred to in para. 9 of the document and an amendment is proposed to this paragraph to refer to this..</p> <p>If a site adjoining a BUAB has particular constraints then this will be taken into account. These are referred to in para. 15 of the document.</p>
<p><b>Q3. Do you agree with the sequential approach set out in paragraph 9 of the Draft SPD?</b></p>	<p>Of those respondents that answered this question 56% agreed with the matters identified in the Draft SPD and 44% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> <li>- Any other sites should be deliverable as well as available and suitable</li> <li>- Add to end of 3<sup>rd</sup> bullet point “or easily accessible from the parent village”</li> <li>- The use of the BUAB as a starting point for expansion is unfortunate. Up to now it has been a line that should not be crossed</li> <li>- Stages 2 and 3 should be combined removing any preference for sites adjoining the BUAB</li> <li>- Priority should be given to developing brownfield sites that are well related to the built-up area of a Core Village and have good access to local facilities and services</li> </ul>	<p>Agree that “deliverable” should be added to the first bullet point.</p> <p>Agree to add “or easily accessible from the parent village” to the 3<sup>rd</sup> bullet point</p> <p>The purpose of CS11 is to introduce a more flexible approach to development for Core and Hinterland Villages, including consideration of proposals outside existing BUABs</p> <p>It is not accepted that sites that do not adjoin existing</p>

		<p>BUABs should be considered on an equal basis to those that do. Sites that adjoin existing BUABs are more likely to form a natural extension to the village. It is accepted that there should be a reference to brownfield sites in para. 9 and an amendment is proposed.</p>
<p><b>Q4. Do you agree with the approach to assessing the scale of the proposal as set out in paragraph 10 of the Draft SPD?</b></p>	<p>Of those respondents that answered this question 76% agreed with the matters identified in the Draft SPD and 24% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> <li>- The reference to the requirement for 1050 dwellings should be clarified</li> <li>- The 1050 houses should not be regarded as a ceiling on development as housing numbers should be expressed as a minimum</li> <li>- The last sentence of para 10 should be amended to read “.. demonstrate that the development can be accommodated without adversely affecting the character of the village and that the services, facilities and infrastructure have the capacity to accommodate it or will be enhanced to accommodate it”</li> <li>- You should use a % identification of the number of units that would be appropriate for each settlement. 20% for each rural settlement would be appropriate so that regardless of size, the eg: 10 unit hamlet can absorb an additional 2 units to help elderly people to downsize or young families to access a home. Your design policies are the safeguard in terms of enabling appropriate development that adds rather than detracts from visual amenity.</li> <li>- In determining whether the scale of development is appropriate to a village/functional cluster reference should also be made to the SHMA and other evidence base documents which are periodically updated to provide a contemporary assessment of housing needs</li> <li>- In terms of assessing the scale and size of a proposal the scale of the developable area in</li> </ul>	<p>Agree that further explanation and clarification of the requirement for 1050 dwellings should be given. Agree that the last sentence of para. 10 should be amended as suggested. The majority view is that the approach outlined in the document is appropriate and specific numbers or percentages should not be applied. It is accepted that proposals should reflect up to date housing needs. This is referred to in para 12 of the document. Proportionality is already covered in para.10</p>

	<p>comparison to the settlement should also be a key consideration alongside the proposed number of dwellings</p>	
<p><b>Q5. Should paragraph 10 specify an upper limit for the number of dwellings that can be permitted on any one site under this policy?</b></p> <p><b>If yes, what should that limit be (please state whether your response refers to Core Villages or Hinterland Villages or both)?</b></p>	<p>Of those respondents that considered upper limits should be specified a number of different suggestions were made including:</p> <p>50 for Core Villages 15-20 Hinterland Villages</p> <p>10 for Core Villages per planning application 5 for hinterland villages per planning application</p> <p>3 for hinterland villages</p> <p>A 20% increase per rural settlement as a global figure</p> <p>In both cases the limit should be set on the basis of a small percentage (low single figures: eg: 1-5%) of existing settlement size with an added weighting reducing the limit to reflect existing services.</p> <p>2% for hinterland villages 5% for Core Villages</p> <p>10% for both Core and Hinterland Villages</p>	<p>Although a number of suggestions were made about limits to development the majority view was that the approach outlined in the document is appropriate and therefore it is not proposed to include upper limits in either Core or Hinterland Villages.</p>

<p><b>Q6. Do you agree with the approach to assessing the cumulative impact of proposals as set out in paragraph 11 of the Draft SPD?</b></p>	<p>Of those respondents that answered this question 67% agreed with the matters identified in the Draft SPD and 33% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> <li>- Any development proposals should take into account the cumulative effect on nearby villages and neighbouring local authority areas, not just the effect on the functional cluster of villages in Babergh District</li> <li>- As in question 3 this relates back to whether or not existing commitments and other proposals are deliverable</li> <li>- The effect of recent development in a village should be considered as part of the cumulative effect</li> <li>- Existing conditions should be considered when assessing impacts</li> <li>- Add landscape impact</li> <li>- Paragraph 11 should be amended to reference the need to provide new infrastructure, subject to the overall viability of the scheme</li> </ul>	<p>Agree to add a reference to other nearby villages and neighbouring local authority areas</p> <p>Agree to add “deliverable” to para. 9</p> <p>The amount of development that has taken place in the recent past is relevant insofar as it might affect the ability of services and facilities to accommodate additional development. However the fact that a village may have experienced recent development is not, of itself, a reason for not considering further development. Existing conditions will act as a baseline for assessing impacts of additional development.</p> <p>Landscape impact is covered in para.15.</p> <p>It is accepted that there should be a reference to viability and an amendment is proposed to para. 10</p>
<p><b>Q7. Do you agree that the constraints and impacts</b></p>	<p>Of those respondents that answered this question 72% agreed with the matters identified in the Draft SPD and 28% disagreed.</p> <p>The main issues raised by those disagreeing were:</p>	<p>Agree that references to setting, non-designated heritage assets, nationally and locally designated areas</p>

<p><b>identified in paragraph 15 are relevant and appropriate?</b></p>	<ul style="list-style-type: none"> <li>- They do not give sufficient protection to the majority of the countryside in Hinterland Parish boundaries which has no specific designation or to houses and buildings which form the character of a place despite not being listed</li> <li>- The impact on heritage assets should include the impact of development within their setting (NPPF para.132)</li> <li>- The impact of development on non-designated heritage assets should also be included (NPPF para. 135)</li> <li>- The impact on designated landscape areas should clarify that this applies to both nationally and locally designated areas</li> <li>- Contamination issues should also be identified as a potential constraint.</li> <li>- The Draft SPD does not add anything significant to what is already stated in the NPPF and the Development Plan</li> <li>- The constraints should include impact of any loss of amenity to current residents/community and the impact upon the quality of life of current residents/community</li> <li>- Proposals also need to have regard to the infrastructure of the area as a whole e.g. road systems, water availability</li> </ul>	<p>and contamination should be made Infrastructure is referred to in para. 10 of the document</p>
<p><b>Q8. Do you agree that the matters identified in the Assessment Checklist at Appendix 4 of</b></p>	<p>Of those respondents that answered this question 55% agreed with the matters identified in the Draft SPD and 45% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> <li>- A reference to the natural environment is needed</li> <li>- Need to add 'will the proposal have an impact on' : un-designated heritage assets and the setting of all heritage assets</li> </ul>	<p>Criteria relating to the natural environment are already included Agree to add setting of heritage assets Agree to add public highway to capacity issues Agree to add a new para. In</p>

<p><b>the Draft SPD are relevant and appropriate?</b></p>	<ul style="list-style-type: none"> <li>- Under 'Are there any known capacity issues' include 'public highway'</li> <li>- Make it clear that development sites have to be located within the administrative boundary for Babergh.</li> <li>- Frequency of bus routes should also take into account the location of the bus stop and whether or not the stop is marked and is accessible to a hard surfaced footway. Also the reliability of the service and whether the buses which operate are accessible by people with disabilities, the elderly and young children.</li> <li>- It is unclear if the "check List" is for developers to complete, alongside a written statement, or if this is for the Local Authority to assess a developer's written statement.</li> <li>- Question 3 and 4 are similar, and it would be sufficient with just Question 4.</li> <li>- Question 6 relates to figures, and specifically a percentage. The second part of Question 6 "...and what proportionate increase will this be in the number of dwellings in the village?" should be removed.</li> <li>- With regards to Question 17, the text "what is the severity of that impact?" should also be removed as this is subjective.</li> <li>- The checklist needs to have added to it in the question "Will the proposal have an impact on <ul style="list-style-type: none"> <li>any heritage asset</li> <li>conservation area</li> <li>listed building</li> <li>site of archaeological importance."</li> </ul> The additional types of heritage assets need to be added as they are omitted but are designated heritage assets namely: <ul style="list-style-type: none"> <li>• "registered park and gardens</li> <li>• registered battle fields</li> <li>• scheduled monuments</li> <li>• protected wreck sites</li> <li>• non-designated heritage assets or locally listed assets."</li> </ul> </li> <li>- The checklist asks what social benefits and what economic benefits does the proposal provide but fails to ask what environmental benefits does the proposal provide. The NPPF treats social economic and environmental issues equally and this checklist should adopt the same approach.</li> </ul>	<p>document relating to the application of the policy</p> <p>Distance from site to public transport is already included</p> <p>Agree that the purpose of the checklist should be clarified</p> <p>Questions 3 and 4 deal with different matters.</p> <p>Do not agree that the reference to proportionate increase should be removed</p> <p>Agree to remove "severity of impact" as being subjective</p> <p>Agree to add list of other heritage assets</p> <p>Agree to add environmental benefits</p> <p>Agree to add a reference in the document that the level of detail required should be proportionate to the number of dwellings proposed and the type of application</p> <p>Agree to add brownfield land to the checklist</p> <p>AONB is covered by the reference to designated areas of landscape importance.</p>
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	<ul style="list-style-type: none"> <li>- Consideration should be given to the level of information that should be provided within outline applications for example in relation to the final mix of market housing</li> <li>- The role of Appendix 4 needs clarity</li> <li>- Appendix 4 should include an additional field relating to previously developed land</li> <li>- The list should include a reference to phasing</li> <li>- The assessment checklist should consider proportionality i.e the level of detail required to support an application should be related to the number of dwellings proposed.</li> <li>- AONB or adjacent to AONB should be added</li> </ul>	
<p><b>Q9. Do you have any other comments on the Draft SPD?</b></p>	<p>Nearly all respondents provided additional comments. Some comments were related to specific settlements or sites. As the SPD is not location specific it is not appropriate to refer individual settlements or sites. This summary therefore only includes reference to general points made on the document not covered by the previous questions.</p> <p>The main points made were:</p> <ul style="list-style-type: none"> <li>- Para 8 site allocation It is not democratic to allow expansion beyond settlement boundaries/built up area boundaries without going through the accepted procedure of public consultation on a site allocations document.</li> <li>- Para 12 local needs An interpretation of this paragraph is that the analysis of housing need may be carried out by the developer, but it would have to be in consultation with Babergh and the village in order for the conclusions to be justifiable.</li> </ul>	<p>Policy CS11 forms part of the adopted Development Plan and the flexibility that it provides to consider sites beyond existing BUABs has been established through a democratic process.</p> <p>Agree that further explanation of how the local needs will be assessed should be included in para.12</p>

	<ul style="list-style-type: none"> <li>- Paragraph 19. The information to be submitted should accord with the Council's published Local Validation List. This extensive list of additional information required runs contrary to the Government's wishes to simplify and reduce the amount of information to be submitted with planning applications.</li>   <li>- The information to be submitted in support of an application should be proportionate to the scale of development proposed</li>   <li>- Para. 13: currently this requires all new footpath connections between new housing and services to be lit. The decision on appropriate lighting should be taken at the application stage as it may be contrary to: <ul style="list-style-type: none"> <li>•NPPF para. 125 which requires that decisions should not impact on local amenity or intrinsically dark landscapes,</li> <li>•NPPG guidance: Light Pollution para 001 which states that artificial light is not always necessary, and</li> <li>•2006 Defra good practice guidance on Lighting in the Countryside which states that the process of preparing a lighting scheme should begin with an assessment of the need for the lighting.</li> </ul> </li>   <li>- Appendix 1 of the draft CS11 SPD lists Sproughton as a Hinterland Village However, the LDF has also policy CS1 in which part of Sproughton is identified as an edge of urban area included in the Babergh Ipswich Fringe as Policy CS5.It is therefore not clear how the LPA will consider development in Sproughton.</li>   <li>- Paragraph 13 – Suggest including text to make it clear that the walking distances are not “as the crow flies” and have to take into account local circumstances not just gradient (i.e rivers, main roads and other potential constraints), it may also be worth making sure that access to sites could not be compromised by potential flooding;</li>   <li>- Map 4 Appendix 5 – After “Villages listed in italics are outside Babergh” add the text “and are not subject to this SPD.”. Also remove both Borley and Alphamstone from the map as these a very small hamlets and development would not be encourage in these locations by Braintree District Council;</li> </ul>	<p>The information to be submitted should be included in the Planning Statement which is one of the Council’s validation requirements</p> <hr/> <p>Agreed. An amendment is proposed.</p> <hr/> <p>Agree to remove reference to “lit”</p> <hr/> <p>CS11 applies to the village of Sproughton and not the area of the Parish which forms part of the Ipswich fringe</p> <hr/> <p>Agree to refer to actual distances</p> <hr/> <p>A new para. on the application of the policy is proposed which will refer to this.</p>
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	<ul style="list-style-type: none"> <li>- Appendix 3 page 15 last paragraph, typo correction needed on ANOB , also I would suggest including Scheduled Ancient Monuments after conservation areas.</li>   <li>- With regards to paragraph 19 we are in agreement with the point which states there should be the inclusion of “a statement demonstrating how the proposal will help to meet local needs for market housing, affordable housing and community needs and justifying the type and mix of housing.” This appears to be a reasonable requirement from developers, however it should not be a requirement for developers to provide this data and evidence of market need, therefore it should only be a requirement to include a statement of how the development meets these needs.</li>   <li>- we object to the current wording of paragraph 12 and the onus being put upon developers to provide an assessment of local housing need. The lpa should provide this information</li>   <li>- We believe that the criteria detailed in paragraph 13 are too restrictive for a rural situation. Surely sustainable features can be considered to be available beyond these distances.</li>   <li>- Para 7 Availability of Services and Facilities. As worded the document would allow any development to be turned down in a hinterland village where there was no Doctor's Surgery. This too restrictive. It should only require access within a functional cluster.</li>   <li>- Para 13 Lighting of connecting paths from development to the main village. This is plain wrong. Lighting, which all the evidence shows actually increases crime, should be actively discouraged, not required.</li>   <li>- The first two preferences for location of development in para. 9 should be reversed so as to avoid continuing infill of the village and historic green spaces, destruction of historic village street scenes, and raising the density of current housing to adverse effect of the current village.</li> </ul>	<p>Noted</p> <hr/> <p>An amendment is proposed to para. 12</p> <hr/> <p>An amendment is proposed to para. 12</p> <hr/> <p>The distances are based on national guidance</p> <hr/> <p>An amendment is proposed to para. 13.</p> <hr/> <p>Agree to delete reference to lighting</p> <hr/> <p>Open spaces etc within existing villages are protected by other policies in the Development Plan</p>
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	<ul style="list-style-type: none"> <li>- Para 18: it should be a condition that the local consultation must involve the Parish Council and environmental groups including Transition groups as part of the Pre-application process before an application is submitted.</li>   <li>- As it applies to Core Villages no value is placed on Neighbourhood Plans in either CS11 or the SPD. NPs follow an evidence based process following engagement with the local community. The value and the democratic nature of any NP must be supported by the planning process and the Local Planning Authority. The SPD therefore requires an overarching statement underscoring the value placed on any NP and the need to take full cognizance of them whether they be in process and/or Made. This will also reduce the avoidance of any doubt in the mind of any developer.</li>   <li>- The planning balance judgement needs also to take into account the statutory duties upon LPAs under the legislation already referred to in the answer to Q1. Accordingly it is not just NPPF guidance that needs to be referred to.</li>   <li>- Pre-application discussion and consultation. The council should “require” not “expect” developers and landowners to carry out local consultation. This paragraph should spell out that local consultation should be with the parish council and the local community affected. The statement dealing with the consultation that has also taken place should we suggest include also “the means by which the consultation has taken place over what period and what issues raised by the community have not been addressed by the proposal”.</li>   <li>- The approach set out in CS11 makes it difficult to quantify the amount of development that is likely to come forward in each settlement. This makes assessment of cumulative impacts very difficult. For some types of infrastructure, notably education, this makes it harder to determine where necessary new school place provision should be made</li>   <li>- Para 7 Add “Availability of services and facilities, their ability to expand and the contribution which development would make to their long-term viability</li>   <li>- Para 8 Amend bullet point to read “How the site is connected to the existing settlement’s jobs,</li> </ul>	<p>Agree to strengthen para. 18 in relation to the requirements for consultation and community engagement</p> <p>Agree that the guidance should include a reference to the role of Parish and Neighbourhood Plans</p> <p>Agree to add “all relevant policies and legislation”</p> <p>Agree that para. 18 should be strengthened.</p> <p>It is accepted that it is one of the implications of the policy that it will be difficult to quantify the amount of development that will come forward in each settlement</p> <p>Agreed</p> <p>Agreed</p>
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	facilities and services, including location of site access and availability of sustainable transport links	
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# **RURAL HOUSING POLICY AND CORE STRATEGY POLICY CS11**

## **SUPPLEMENTARY PLANNING DOCUMENT (SPD)**

July 2014



## SUPPLEMENTARY PLANNING DOCUMENT (SPD) ON RURAL HOUSING POLICY AND CORE STRATEGY POLICY CS11

### Purpose of Document

1. This document has been produced to provide guidance on the interpretation and application of Policy CS11 of the Babergh Core Strategy which was adopted on 25th February 2014. **Consultation on a draft SPD was carried out in June 2014 and this document incorporates changes made as a result of that consultation.**

### Background

2. Policy CS11 of the Core Strategy sets out a new and more flexible approach to housing provision in rural areas. It provides for proposals for development for Core Villages to be approved together with sites elsewhere where they satisfactorily address matters set out in the policy and score positively against criteria set out in Policy CS15. It also provides for development in hinterland villages to be approved where it meets certain criteria. Although this note concentrates on CS11 it is important that proposals have regard to all the relevant objectives and policies of the Plan. Objectives 1, 2 and 7 and policies CS2 and CS15 are particularly relevant. Objective 1 of the Core Strategy is to enable mixed and balanced communities/comprehensive neighbourhoods; objective 2 is to support economic growth and prosperity building on the strengths of the local economy, including strengthening the role of the local economy; and objective 7 is to support rural communities, services and facilities. Policies CS2, CS11 and CS15 are set out in Appendices 1, 2 and 3 to this document.
3. The Core Strategy provides for 1050 additional dwellings to be located in Core and Hinterland Villages between 2011 and 2031. It was written on the basis that the amount of new development and locations for it would be dealt with in a Site Allocations Document. A Site Allocations Document may not be prepared for some time and in the meantime proposals for Core and Hinterland Villages will be considered on the basis of the policies in the Core Strategy and the guidance set out in this and other relevant documents.

### Application of Policy CS11

- 3A. Policy CS11 states that “Proposals for development for Core Villages will be approved....” and “Development in hinterland villages will be approved....”. Para. 2.8.5.7 of the Core Strategy states that “The BUABS (Built Up Area Boundaries) defined in the 2006 Local Plan Saved Policies....provide a useful starting point when considering the relationship of proposed development in relation to the existing pattern of development for that settlement and for defining the extent of its developed area and a distinction between the built up

area and the countryside.” The general purpose of the policy is to provide more flexibility in the location of new housing development in rural areas. Where sites in Core and Hinterland Villages are within an existing BUAB (as defined in the 2006 Local Plan) the principle of development has already been established and in most cases sites will be compliant with the criteria set out in CS11. However such sites will still need to be tested against other policies in the Development Plan and Policy CS18 of the Core Strategy relating to the mix and type of dwellings will be particularly relevant. All proposals outside BUABS will need to demonstrate compliance with all the criteria set out Policy CS11 and provide appropriate evidence a set out in this guidance.

3B.. The Plan at Appendix 5 to this document identifies some villages outside of Babergh District as hinterland villages. For the avoidance of doubt Policy CS11 only applies to Core and Hinterland Villages within Babergh District.

### **Criteria for Assessment**

4. For Core Villages CS11 refers to:

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

5. For hinterland villages CS11 additionally refers to:

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

6. Policy CS15 sets out 21 criteria that proposals should meet on implementing sustainable development. These cover the matters set out in CS11 together with criteria seeking to minimise the environmental impact of the development. The CS15 criteria are listed in Appendix 3.
7. Based on the above it is considered that proposals put forward for consideration under policy CS11 should have regard to the following matters :
  - Site location and relationship to settlement
  - Sequential approach to site selection
  - Scale of proposal in relation to existing settlement
  - Cumulative impact taken with existing commitments or other proposals
  - Local needs
  - Availability of services and facilities, **their ability to expand and the contribution which development would make to their long-term viability**
  - Social and economic benefits of development
  - Constraints and impacts

More guidance on each of these is set out below.

### **Site Location and Relationship to Settlement**

8. To be considered under CS11 proposals must be in or adjacent to a Core Village or a Hinterland Village. These are listed in Appendix 1. Proposals should be well related to the existing settlement. It is suggested that the starting point for assessing this is whether or not the site adjoins the Built Up Area Boundary (BUAB) of the village. Some sites, even though they adjoin a BUAB, may not be well related to the village and a judgement will need to be made taking into account issues such as:
  - Whether the proposal would constitute ribbon development on the edge of the village
  - How the site is connected to the existing settlement, **jobs, facilities and services** including location of site access and availability of **sustainable transport** links
  - The scale, character **and density** of the proposal in relation to the existing adjoining development
  - Whether the proposal constitutes a logical extension of the built-up area of the village
  - Whether the proposal is self-contained and has logical, natural boundaries

### **Sequential Approach**

9. In considering the suitability of sites for development under CS11 the Council will have regard to the sequential approach. In the context of CS11 this means:

- In the first instance considering whether there are other available, suitable **and deliverable** sites within the built-up area of the village
- If no suitable sites are available within the built-up area then the next preferred location is sites which adjoin the built-up area of the village
- Sites that do not adjoin the existing built-up area of the village will only be considered if there is special justification e.g. it is meeting a local need which cannot be met elsewhere **or is easily accessible from the parent village**

**Preference will also be given to brownfield sites where these are well located and meet sustainability criteria**

### **Scale of Proposal in Relation to Existing Settlement**

10. Policy CS11 does not set out any upper or lower limits for proposals that can be considered under the policy. However in assessing the proposals the Council will have regard to the fact that the total number of dwellings allocated to Core and Hinterland Villages by the Core Strategy for the period **between 2011 and 2031 is a minimum of 1050. The background to and justification for this allocation is set out in Section 2 of the Core Strategy.** Policy CS2 also states that “Core Villages will act as a focus for development within their functional cluster” and “Hinterland Villages will accommodate some development to meet the needs within them”. The size and scale of any proposal should be proportionate to the settlement in which it is located. Because each village is different it is not possible to prescribe standard proportions of development that would be acceptable. A judgement will need to be made on the basis of the size and character of the village, the services and facilities that are available and their capacity to accommodate further development. Core Villages will normally have the ability to accommodate a higher proportion of development than hinterland villages. Because hinterland villages are generally smaller and have fewer services and facilities it is expected that proposals for consideration under this policy will be small-scale. However as with Core Villages, Hinterland Villages vary considerably in their size, scale and nature. Proposals for hinterland villages will need to be proportionate to the size of the existing settlement and take into account the type and number of facilities in the village, local opportunities and needs. Some hinterland villages may be able to accommodate higher levels of development than others. It may be that for some of the hinterland villages there is no clear focus for development and facilities and services to support development may not be present. In these circumstances proposals for development are unlikely to meet the criteria set out in CS11. Proposals for

both core and hinterland villages will need to demonstrate that the development can be accommodated without adversely affecting the character of the village and that the services, facilities and infrastructure have the capacity to accommodate it or will be enhanced to accommodate it. Where enhancements to facilities and services are required the impact that this will have on the viability of the proposal will be taken into account.

### **Cumulative Impact**

11. Similar considerations to those set out in paragraph 13 below apply. The cumulative impact should include existing commitments and other proposals in the same village and existing commitments and other proposals in the cluster where they are likely to have a wider impact for example in terms of traffic generation, capacity of schools and health services. The impact on other nearby villages and neighbouring local authority areas should also be taken into account. The functional clusters in Babergh are shown on Map 4 of the Core Strategy which is included as Appendix 5 to this document.

### **Local Needs**

12. A key part of CS11 is that proposals should meet locally identified need. The policy refers to housing, employment and specific local needs such as affordable housing and locally identified community needs. Policy CS18 of the Core Strategy also states that the mix, type and size of housing development will be expected to reflect established needs in the Babergh District. Objective 1 of the Core Strategy refers to the delivery of a mix of housing types which matches the identified need being a critical success factor. Developers should therefore set out how the proposal meets these locally identified needs. This should include an analysis of the number and types of dwelling in the village, an assessment the need for housing in the village and the identification of any gaps in provision. Proposals should provide affordable housing in accordance with Policy CS19. Proposals should therefore be accompanied by a statement that analyses the local housing, employment and community needs of the village and how they have been taken into account in the proposal. It is anticipated that such statements should be prepared in consultation with the Council using evidence from a number of sources.

### **Availability of Services and Facilities**

13. The availability of and access to local services and facilities is a key consideration in determining whether a proposal is sustainable. It is the range of services and facilities available that is important as this will have a bearing on the size and scale of development that can be accepted i.e. a village with a wide range of services and facilities is more sustainable and can potentially accommodate a greater amount of development. The capacity or services and facilities and the

ability of proposals to contribute towards their improvement also needs to be taken into account. The availability of local employment improves the sustainability of a settlement. Proposals should state how the balance between homes and jobs in the village will be affected. The availability and frequency of public transport is also an important consideration. For walking distances the Department for Transport Local Transport Note 1/04 recommends:

Desirable	- 400 metres
Acceptable	- 800 metres
Preferred Maximum	– 1200 metres

These distances should be reduced by 10 metres for every rise or fall of 1 metre **and should be measured along the route to be taken rather than a straight line.**

These distances should be considered alongside the quality and continuity of the footpath connection. Connections between any proposal and village services and facilities should be continuous and have a good quality surface **and be lit.**

Proposals should therefore be supported by a statement which examines the availability and capacity of local services and facilities and assesses the impact of the proposal on their provision.

## **Sustainability**

14. Proposals will also need to demonstrate how they meet the sustainability criteria set out in CS15. Proposals should also have regard to paragraph 7 of the NPPF which refers to three dimensions of sustainable development: economic, social and environmental.

## **Constraints and Impacts**

15. The NPPF states that there is a presumption in favour of sustainable development and planning permission should be granted unless the adverse impacts of doing so significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework as a whole. Proposals therefore need to have regard to issues such as:

- The impact on the character and appearance of the countryside
- The impact on any listed buildings, conservation areas, sites of archaeological interest **and their setting and on non-designated heritage assets**

- The impact on any **nationally or locally** designated areas of landscape or ecological importance
  - **Contaminated land**
16. Proposals will also need to satisfy normal development management criteria such as access, drainage and flood risk.

### **The Planning Balance**

17. After considering the issues set out above it will be necessary to reach a judgement on the proposal in the context of sustainable development **and all relevant policies and legislation**. **The checklist included at Appendix 4 provides guidance on the matters covered by CS11 which will be taken into account in reaching this judgement.**

### **Pre-Application Discussion and Consultation**

18. Developers and landowners are **expected** to discuss their proposals with the Council before submitting a planning application. The Council will also **require** developers and landowners to carry out local consultation on their proposals before an application is submitted. **In this respect developers and site promoters should engage with local communities before proposals are formulated in any detail using recognised community engagement techniques. The proposals for community engagement should be discussed and agreed with the Council before it is carried out. Reference should be made to Parish or Neighbourhood Plans where they exist.** Applications should be accompanied by a statement setting out the consultation that has taken place, the issues raised and how they have been addressed by the proposal.

### **Role of Parish Plans and Neighbourhood Plans**

- 18A The Council will give weight to the findings of Parish and Neighbourhood Plans where they have been prepared in accordance with the Core Strategy and have been subject to a robust process including community engagement.**

### **Information Required to Support a Planning Application**

19. Applicants are advised to contact the Council's Development Management Team for advice on the information that is required to support a planning application and for it to be validated. The information required for proposals that are put forward for consideration under CS11 will need to be supported by a statement setting out how the matters set out in this guidance have been addressed including:
- an assessment of the site's relationship to the existing settlement
  - a statement demonstrating compliance with the sequential approach

- justification of the size of the proposal in relation to the existing settlement
- an assessment of cumulative impact
- a statement demonstrating how the proposal will help to meet local needs for market housing, affordable housing and community needs and justifying the type and mix of housing
- an assessment of local services and facilities and their capacity to accommodate the development proposed
- a sustainability statement setting out compliance with CS15
- an examination of the proposal's impact on the character and appearance of the countryside and any matters of heritage, landscape or ecological importance
- a public consultation statement

In determining the level of detail required the Council will take into account the number of dwellings proposed and the type of application.

## **Other Matters**

### **Five-Year Land Supply**

20. The Council constantly monitors the housing land supply in the District and produces updates from time to time and at least once per year in its Annual Monitoring Report. If the Council does not have a five year supply of housing land it will also be necessary for the Council to make decisions on housing proposals based on the National Planning Policy Framework (NPPF), particularly paragraph 49.

### **Allocations Document**

21. The Council will prepare an Allocations Document which will define the built-up areas of villages and allocate strategic sites for development. Until the Site Allocations Document has been prepared the built-up area boundaries shown in the Babergh Local Plan Second Alteration will continue to apply.

### **Implementation and Monitoring**

22. The guidance set out in this SPD will be used to assist decision making on proposals that come forward under CS11. The guidance will be kept under review and may be revised in the light of experience.

## **Policy CS2: Settlement Pattern Policy**

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

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

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

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

Core Villages will act as a focus for development within their functional cluster and, where appropriate, site allocations to meet housing and employment needs will be made in the Site Allocations document.

### **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 will accommodate some development to help meet the needs within them. All proposals will be assessed against Policy CS11. Site allocations to meet housing and employment needs may be made in the Site Allocations Document where circumstances suggest this approach may be necessary.

Hinterland Villages are listed below:

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

## **Countryside**

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

**Policy CS11: Strategy for Development in Core and Hinterland Villages**

Proposals for development for Core Villages will be approved where proposals score positively when assessed against Policy CS15 and the following matters are addressed to the satisfaction of the local planning authority (or other decision maker) where relevant and appropriate to the scale and location of the proposal:

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

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

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

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

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

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

**New retail, leisure and community uses appropriate in scale and character to the role, function and appearance to their location will be encouraged in Core and Hinterland Villages, subject to other policies in the Core Strategy and Policies document, particularly Policy CS15, and other subsequent (adopted) documents as appropriate.**

### Criteria Set Out in CS15 – Implementing Sustainable Development in Babergh

#### Proposals must/should

- respect the local context and character of the different parts of the District
- address and contribute to meeting the objectives of the Local Plan

The scale and nature of the proposal should:

- respect the landscape, landscape features, streetscape/townscape, historic assets, important spaces and historic views
- make a positive contribution to the local character, shape and scale of the area
- protect or create jobs and sites to strengthen or diversify the local economy particularly through the potential for new employment in higher skilled occupations to help reduce the level of out-commuting and raise workforce skills and incomes
- ensure an appropriate level of services, facilities and infrastructure are available or provided to serve the proposed development
- retain, protect or enhance local services and facilities and rural communities
- consider the aspirations and level and range of support required to address deprivation, access to services and the wider needs of an ageing population and also those of smaller rural communities
- protect and enhance biodiversity, prioritise the use of brownfield land for development and make efficient use of Greenfield land and scarce resources
- address climate change through design, adaptation, mitigation and by incorporating or producing sources of renewable or low-carbon energy
- make provision for open space, amenity, leisure and play through providing, enhancing and contributing to the green infrastructure of the District
- create green spaces and/or extend existing green infrastructure to provide opportunities for exercise and access to shady outdoor space within new developments and increase the connectivity of habitats and the enhancement of biodiversity and mitigate some of the impacts of climate change e.g. enhancement of natural cooling and reduction in the heat island effect, provision of pollution sequestration for the absorption of greenhouse gases and through the design and incorporation of flood water storage areas, sustainable drainage systems (SUDs)

- minimise the exposure of people and property to the risks of all sources of flooding by taking a sequential risk-based approach to development and, where appropriate, reduce overall flood risk and incorporate measures to manage and mitigate flood risk
- minimise surface water run-off and incorporate sustainable drainage systems (SUDs) where appropriate
- minimise the demand for potable water in line with, or improving on Government targets and ensure there is no deterioration of the status of the water environment in terms of water quality, water quantity and physical characteristics
- minimise waste (including waste water) during construction and promote and provide for the reduction, re-use and recycling of all types of waste from the completed development
- minimise the energy demand of the site through appropriate layout and orientation (passive design) and the use of building method, materials and construction techniques that optimise energy efficiency and are resilient to climate change (e.g. resilience to high winds and driving rain)
- promote healthy living and be accessible to people of all abilities including those with mobility impairments
- protect air quality and ensure the implementation of the Cross Street (Sudbury) Air Quality Action Plan is not compromised
- seek to minimise the need to travel by car using the following hierarchy: walking, cycling, public transport, commercial vehicles and cars thus improving air quality and
- where appropriate to the scale of the proposal provide a transport assessment/travel plan showing how car based travel to and from the site can be minimised and proposals for the provision of infrastructure and opportunities for electric, plug-in vehicles and car sharing schemes

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

there will be damaging impacts if a proposal is otherwise acceptable and granted planning permission.

## Assessment Checklist

## Location of Proposal:

Criteria	Comment
How does the proposal meet and contribute to the Council's Core Strategy objectives, in particular objectives 1, 2 and 7	
Is the proposal in a Core or Hinterland Village?	
Is the proposal adjacent to the BUAB?	
<b>Is the site brownfield land?</b>	
How is the site linked to the existing village?	
Does the scale and character of the proposal fit in with the existing adjoining development?	
How many additional dwellings are proposed and what proportionate increase will this be in the number of dwellings in the village?	
How many dwellings are already committed in the cluster and what will the proportionate increase be in the number of existing dwellings in the cluster?	
Does the proposal include a justification for the number, mix and type of dwellings in terms of local need for both market and affordable housing?	
Does the proposal include open space in accordance with the Council's standards including meeting any deficits in the village?	
What is the distance from the site to: <ul style="list-style-type: none"> <li>- a shop</li> <li>- post office</li> <li>- primary school</li> <li>- doctor's surgery</li> <li>- dentist's surgery</li> <li>- public transport</li> <li>- public house</li> </ul>	
What is the frequency of the local bus service?	

<p>Are there any known capacity issues with:</p> <ul style="list-style-type: none"> <li>- primary school</li> <li>- doctor's surgery</li> <li>- foul and surface water drainage</li> <li>- <b>public highways</b></li> </ul>	
<p>Are there any other known needs for the village that could be accommodated on site e.g. employment, community facilities?</p>	
<p>What social benefits does the proposal provide?</p>	
<p>What economic benefits does the proposal provide?</p>	
<p><b>What environmental benefits does the proposal provide?</b></p>	
<p>What effect will the proposal have on the balance between homes and jobs in the area?</p>	
<p>Will the proposal impact on the character and appearance of the countryside? <b>What is the severity of that impact?</b></p>	
<p>Will the proposal have an impact on any heritage asset or their setting:</p> <ul style="list-style-type: none"> <li>- conservation area</li> <li>- listed building</li> <li>- site of archaeological importance</li> <li>- <b>registered parks and gardens</b></li> <li>- <b>registered battlefields</b></li> <li>- <b>scheduled monuments</b></li> <li>- <b>protected wreck sites</b></li> <li>- <b>non-designated heritage assets or locally listed assets</b></li> </ul>	
<p>Does the proposal impact on any designated areas of landscape or ecological importance?</p>	
<p>Can a satisfactory access be provided?</p>	
<p>Is the site in an area at risk from flooding?</p>	
<p>Are there any other known constraints?</p>	

Map 4

- Long Melford**
- Acton
  - Alpheton
  - Boxted
  - Cockfield
  - Great Waldingfield
  - Lawshall
  - Shimpling
  - Stanstead
- Borely*  
*Foxearth & Liston*

Villages listed in *italics* are outside Babergh

- Glamsford**
- Boxted
  - Hartest
  - Somerton
  - Stanstead
- Foxearth & Liston*

- Sudbury & Great Cornard**
- Acton
  - Chilton
  - Great Cornard
  - Great Waldingfield
  - Little Cornard
  - Newton

- Bures**
- Assington
  - Little Cornard
- Bures Hamlet*  
*Mount Bures*  
*Alphamstone*  
*Lamarsh*  
*Bures Hamlet*  
*Bulmer*

- Nayland**
- Assington
  - Leavenheath
  - Polstead
  - Stoke By Nayland
- Little Horkesley*

- Lavenham**
- Alpheton
  - Brent Eleigh
  - Cockfield
  - Great Waldingfield
  - Little Waldingfield
- Milden
  - Preston St Mary
  - Thorpe Morieux
  - Felsham*

- Hadleigh**
- Aldham
  - Burstable
  - Chattisham
  - Eimsett
  - Hintlesham
- Kersey
  - Layham
  - Lindsey
  - Semer
  - Whatfield

- Bildeston**
- Brettenham
  - Chelsworth
  - Hitcham
  - Kersey
  - Kettlebaston
  - Lindsey
- Milden
  - Monks Eleigh
  - Nedging with Naughton
  - Wattisham
  - Battisford*  
*Felsham*

- Ipswich**
- Belstead
  - Burstable
  - Chattisham
  - Copdock & Washbrook
  - Hintlesham
  - Pinewood
  - Sproughton
  - Wherstead

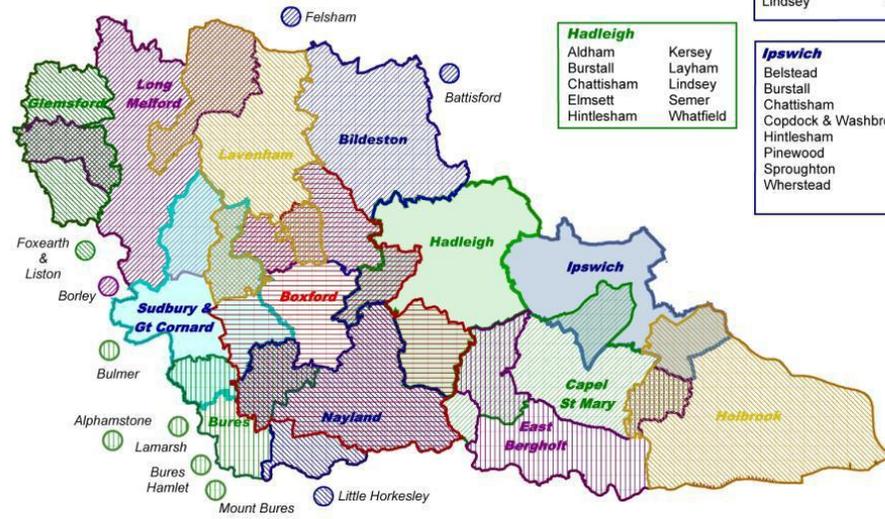
- Holbrook**
- Chelmondiston
  - Erwarton
  - Freston
  - Harkstead
  - Shotley
  - Stutton
  - Tattingstone
  - Wherstead
  - Woolverstone

- Capel St Mary**
- Bentley
  - Copdock & Washbrook
  - Holton St Mary
  - Raydon
  - Tattingstone
  - Wenham Magna
  - Wenham Parva

- Boxford**
- Assington
  - Edwardstone
  - Groton
  - Kersey
  - Layham
  - Leavenheath
  - Lindsey
- Little Waldingfield
  - Milden
  - Monks Eleigh
  - Newton
  - Polstead
  - Shelley
  - Stoke by Nayland

- East Bergholt**
- Brantham
  - Higham
  - Holton St Mary
  - Layham
  - Raydon
  - Stratford St Mary
  - Tattingstone

**Note:** This map shows Functional Clusters of villages in Babergh i.e. the Core Villages with their hinterlands. Some Hinterland and rural villages and hamlets appear in more than one Functional Cluster as this map reflects information gathered in 2010 through workshops, surveys and the input of community representatives from these settlements. Whilst all the Hinterland Villages are shown in these Clusters not all the smaller villages/rural hamlets are included.



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