**BMSDC JLP Consultation response.**

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# PLACE - Bullet Points

1. The definition of a functional cluster is too simplistic and doesn't take account of the multiple interactions of different communities - Sproughton is not simply focussed on Ipswich.
2. Settlement boundaries should be updated to take account of recent/in progress developments NOT proposed development as these may not come to fruition.
3. The amount of development proposed for Sproughton is disproportionate - 55.11% of all development proposed for Babergh. It would increase the size of Sproughton by 397% and mean that Sproughton merges with Bramford & Ipswich.
4. Planning policy should ensure a proportional allocation of housing and employment land across the District in support of the characteristics and needs of existing communities. This would be perceived as fairer

### Functional Clusters

*Consultation question 74: Do you consider the approach to identifying functional clusters appropriate for Babergh and Mid Suffolk? If not, please explain what would be your preferred approach?*

Overview

Functional clusters is a way of looking at the existing spatial geography based on how communities interconnect i.e. through their access to and use of services and facilities. For example, Sproughton has been identified in the Consultation document as sitting in the Ipswich functional cluster on the basis that the community is seen as accessing most of its required services (shopping, schools, doctors, transport links etc.) in Ipswich.

The proposed approach to identifying functional clusters for all Parishes for the purposes of the Consultation document is to identify a single functional cluster on a ‘best fit’ basis. The functional clusters then inform the settlement hierarchy designation – i.e. whether somewhere should be classed as a town, core village, hinter village etc. Classification for these purposes is relevant to determining the approach to planning in respect of a location and for ensuring a consistent approach in respect of similar locations across the Districts.

Issues?

Using single functional clusters is a simplistic approach; it doesn’t recognize the complexity of relationships between communities and, because it is based on past data, it also fails to take account of changing attitudes and behaviours. For example, improvements in broadband mean that use of the Internet for shopping is increasing (and will continue to do so); environmental concerns are driving consumers to smaller, ‘sustainable’ alternatives (farm shops, artisan producers etc). It is therefore questionable as to how effective a tool it is given the obligation to consider sustainable development on a forward-looking basis.

Additionally, use of ‘single best fit’ functional clustering risks the creation of an approach to planning which presumes a greater need for employment and housing land in larger settlements as opposed to in the rural communities. This in turn risks exacerbating the decline of rural communities such that they become ‘village retreats’ for the wealthier.

Suggested response to question 74:

**The approach is not appropriate. Planning policy should not be based on artificial constructs, which over emphasise the role of larger settlements. Planning policy should ensure a proportional allocation of housing and employment land across the Districts in support of the characteristics and needs of existing communities.**

### Settlement Boundaries

*Consultation question 75: Do you consider the proposed new settlement boundaries to be appropriate?*

*Consultation question 76: Are there any other settlements that should be given new settlement boundaries?*

*Consultation question 77: Is the threshold (10 well related dwellings) for identifying settlement boundaries appropriate?*

Overview

Settlement boundaries are used to identify where the principle of development has been established; land outside of settlement boundaries is countryside. Different planning considerations will apply to land outside of settlement boundaries to that within settlement boundaries.

The settlement boundaries across the Districts are viewed as either not reflective of the current built-up form (so need updating) or in need of flexing to permit appropriate small-scale development in rural communities thereby promoting rural vitality and diversity of housing market opportunities.

Appendices 3 and 4 to the Consultation document comprise some 235 pages which are relevant to questions 75 – 78; each page has a map of a settlement area detailing proposed revisions to boundaries and / or sites for development (the latter is addressed by question 78 – see the next page). The consultation seeks views on the appropriateness of the proposed new boundaries for each individual area.

Issues?

For the purposes of the JLP, settlement boundaries have been re-drawn on the basis of the current built-form and a number of additional principles addressing issues such as using physical boundaries, treatment of employment land, playing fields, churches etc. However, the new boundaries have also been drawn to include ‘*allocated [planning] sites and current planning permissions granted before 31 March 2017’*. There is no requirement that development has started or is due to start on such sites.

Suggested response to question 75:

**No.**

**Further thought needs to be given to planning consents that have been granted but not yet delivered. Extensions to a settlement boundary are inappropriate if existing permissions have not been delivered.**

Suggested response to question 76:

**Not that we are currently aware of.**

Suggested response to question 77:

**No. A determination of settlement on the basis purely of numbers is over-simplistic. The setting and historical purpose of any collection of houses is important; for example, a collection of farm workers cottages located in the countryside should not necessarily establish a basis for a larger settlement. The existence of ‘community’ is also important.**

### Potential Land for Development

*Consultation question 78: Do you consider the sites identified to be appropriate for allocation or inclusion within the settlement boundary? (please explain why and quote the settlement and site reference numbers)*

*Consultation question 79: Are there any other sites / areas which would be appropriate for allocation? (If yes, please provide further information and complete a site submission form.)*

Overview

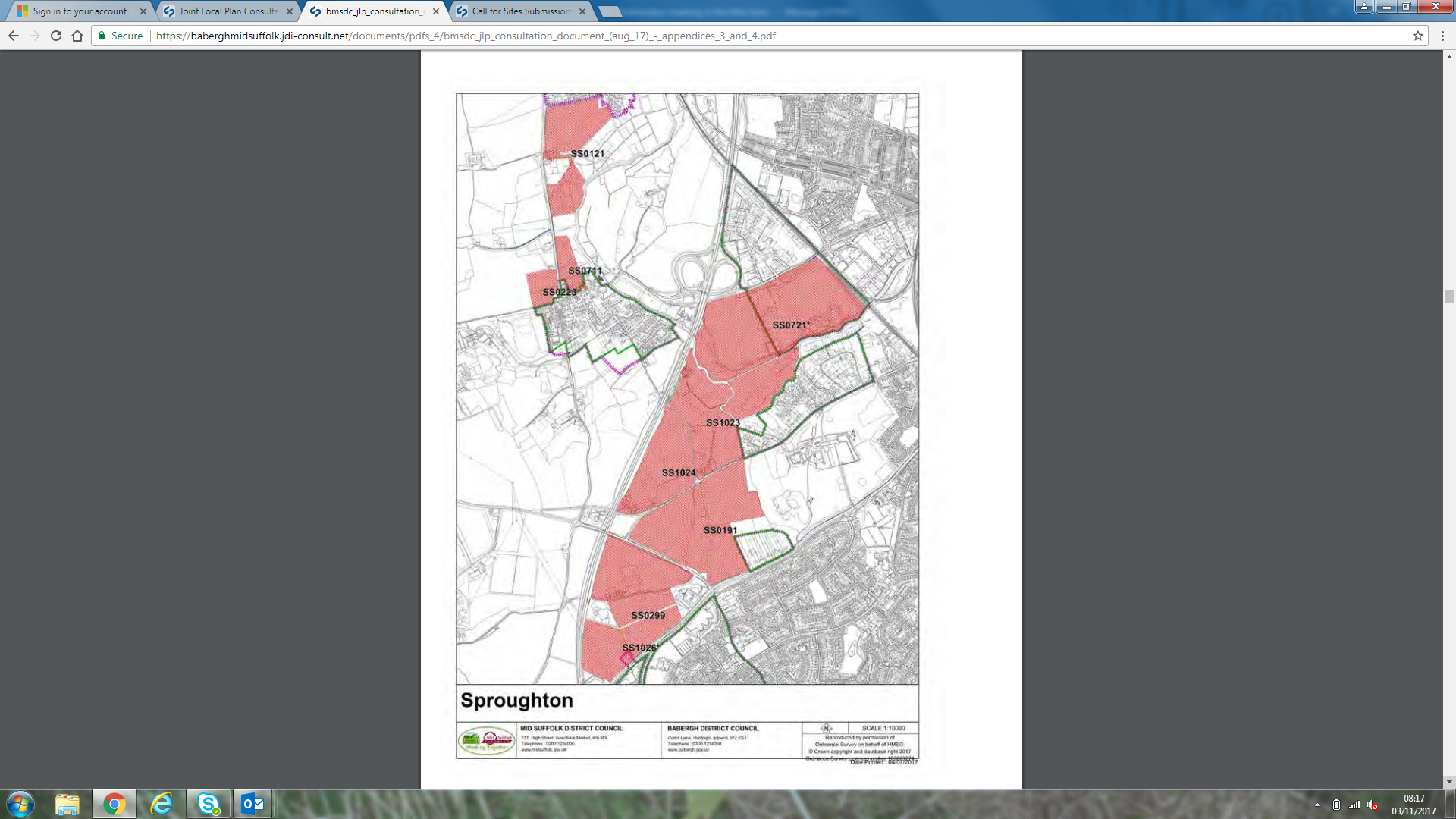
The JLP will identify and allocate land sufficient to meet the Districts’ development needs and requirements. The location of the allocations will depend on the ‘spatial distribution’ (i.e. whether they make sense given the size and location of communities and access to services in the Districts) and the suitability and deliverability of development proposals. Land put forward for development and which the Councils have already identified as *technically suitable[[1]](#footnote-1)* is shown on the maps in Appendices 3 and 4; the Consultation is now seeking views on whether the same sites are ‘appropriate.’

The number of sites proposed across the Districts would deliver housing significantly in excess of the Districts’ needs so there is an obvious selection exercise to be undertaken. Any and all arguments for / against any particular site(s) may (and should!) be made.

With respect to Sproughton, 8 sites have been identified in total (6 for housing and 2 for employment). These essentially cover most of the Chantry Vale (Wolsey Grange to the River Gipping), the old Sugar Beet site, and developments along the Loraine Way meeting up with Bramford[[2]](#footnote-2).

The reference numbers for the various sites identified as *technically suitable* in and around Sproughton are:

|  |  |
| --- | --- |
| **Site Number** | **Description** |
| SS1024 | Land north of Hadleigh Road and west of Church Lane |
| SS0721\* | Former Sugar Beet Factory site *(employment)* |
| SS1023 | Land north of Hadleigh Road and East of Church Lane |
| SS0191 | Land west of London Road (A1214) and east of Hadleigh Road |
| SS0711 | Land east of Loraine Way |
| SS0299 | Land at Poplar Lane |
| SS0223 | Land north of Burstall Lane and west of B1113 |
| SS1026\* | Poplar Lane *(mixed – some employment)* |



Suggested response to question 78:

**On an aggregate basis, no – the sites identified are not appropriate for allocation within the settlement boundary. As a general principle, planning policy should ensure a proportional allocation of housing and employment land across the Districts, sympathetic to and in support of the characteristics and needs of existing communities. *A total of 9,446 dwellings are proposed (sum of dwellings across all sites specified within the SHLAA). However, once the net number of dwellings is calculated having taken into account planning applications granted, in progress etc, the Objectively Assessed Need (OAN) is reduced to 4,210. It appears that 2,320 of these dwellings i.e. 55.11% of the total development proposed in Babergh is designated for Sproughton. This is a significant over development of Sproughton which currently has around 581 dwellings - this would be an increase of 397% in parish size. It is completely disproportionate and would result in Bramford joining with Sproughton and Sproughton being absorbed by Ipswich in the same way that Kesgrave and Rushmere-St- Andrew has been. Not so much 'creeping coalesence' as 'complete digestion'. A much fairer basis for development would be a pro-rated approach with some tweaking for those settlements that are very small in size.***

**On an individual basis, please see below specific comments in respect of sites allocated in and around Sproughton village:**

**SS1024:**

Site not appropriate for development.

In addition to those matters identified as requiring further investigation in the site assessment summary (highways, cordon sanitare and A14 noise, impact upon landscape, townscape and heritage assets, and biodiversity impact upon protected species and habitats - all of which are reasons for NOT permitting development on the scale indicated, if at all) consideration should also be given to:

* The setting and the views into and from Chantry Vale, which are almost unique
* Maintaining a green corridor along the route of the River Gipping (i.e. the Gipping Valley)
* Topography of the proposed site and water courses / drainage
* Provision of schools and health services
* The ‘creeping coalescence’ between Ipswich town and Sproughton village, which would threaten the identity, if not the very existence of, Sproughton village.

**SS0721**

Site appropriate for development, subject to the scheme proposal. It is not clear to local residents, however, why – given the size of the site – a portion may not be allocated to housing.

**SS1023**

Site not appropriate for development.

In addition to those matters identified as requiring further investigation in the site assessment summary (highways, cordon sanitare and A14 noise, impact upon landscape, townscape and heritage assets, and biodiversity impact upon protected species and habitats - all of which are reasons for NOT permitting development on the scale indicated, if at all) consideration should also be given to:

* The setting and the views into and from Chantry Vale, which are almost unique
* Maintaining a green corridor along the route of the River Gipping (i.e. the Gipping Valley)
* Topography of the proposed site and water courses / drainage
* Provision of schools and health services
* The ‘creeping coalescence’ between Ipswich town and Sproughton village, which would threaten the identity, if not the very existence of, Sproughton village.

**SS0191**

Some of the site (specifically, in the south-west corner / adjacent to the existing settlement on London Road) may be appropriate for development, subject to the development of an appropriate scheme, the considerations already identified (highways, cordon sanitare and A14 noise, impact upon landscape, townscape and heritage assets, and biodiversity impact upon protected species and habitats), and further considerations comprising:

* The setting and the views into and from Chantry Vale, which are almost unique
* Maintaining a green corridor along the route of the River Gipping (i.e. the Gipping Valley)
* Topography of the proposed site and water courses / drainage
* Provision of schools and health services
* The ‘creeping coalescence’ between Ipswich town and Sproughton village, which would threaten the identity, if not the very existence of, Sproughton village.

**SS0711**

Site not appropriate for development.

In addition to those matters identified as requiring further investigation in the site assessment summary (highways, environmental and heritage), additional key considerations include:

* Maintaining a green corridor along the route of the River Gipping (i.e. the Gipping Valley) and the views to and from the river-side walks that would be impacted by the proposed site
* ‘Creeping coalescence’ between Bramford and Sproughton.

**SS0299**

Site is appropriate subject to the development of an appropriate scheme.

With respect to the current Wolsey Grange application, no formal decision has yet been published by the Planning Committee. It is our view, however, that the scheme as set out in the application is not appropriate and we support any challenge Sproughton Parish Council may make to any decision approving that application.

**SS0223**

Site not appropriate for development.

The site assessment summary notes appropriate considerations to factor into any decision (highways, landscape, heritage and allotment relocation). However, the District Councils should be in no doubt that any proposed development of a special landscape area, which also results in a loss of amenity and potentially significant negative social and economic impacts on the existing local community, is deeply objectionable.

**SS1026**

Site is appropriate subject to the development of an appropriate scheme.

With respect to the current Wolsey Grange application, no formal decision has yet been published by the Planning Committee. It is our view, however, that the scheme as set out in the application is not appropriate and we support any challenge Sproughton Parish Council may make to any decision approving that application.

Suggested response to question 79:

**No.**

**NOTES:**

Key Issues

The following have been identified as key issues for the Districts:

Social

* Growing population
* Aging demographic
* Lack of provision for accessible open space
* Education (*6th form education accessed outside the Districts*)
* Housing need and affordability (*house prices on average 9x higher than the average earnings or residents and rural areas unaffordable for many*)
* Income Deprivation
* Low crime levels (*and decreasing unemployment*)

Economic

* Economic base: growth sectors are tourism, creative industries, food production, construction and related services, hospitality and leisure. (*Business formation rates in Babergh are at County levels but Mid Suffolk has the lowest rates in Suffolk*)
* Employment levels (*at / higher than England average*)
* Projected growth (*Projected slowdown in job creation; growth driven by Professional and Business Services*)
* Need for land (*Employment land needs expected to be driven by General Office, Science Park, Small Business Units and Distribution*)
* Town Centre Occupation (*Vacancy rates lower than national average but general acknowledgement of need to enhance town centres*)

Environmental

* Environmental assets: Rich historic environment. Water and air are key issues for consideration. ‘*With such a rich but sensitive natural and built environment the pressure of new development will need to be carefully managed’*
* Air Quality
* Biodiversity (*Significant areas of priority habitat / species recorded; some identified as in adverse condition*)
* Geology (*Some areas of recognized geological importance within the Districts*)
* Climate Change (*Flood risk along river courses and coastal erosion*)
* Heritage Assets (*Designated Conservation Areas, Listed Buildings, Scheduled Monuments, Registered Parks and Gardens – significant proportion of the total assets in Suffolk*)
* Landscape (*Significant quality landscape including European and nationally designated areas*)
* Material Assets (*High volume of Grade 3 Agricultural Land and limited brownfield*)
* Water Quality (*Improvements needed in places; additional infrastructure needed to ensure capacity for new development*)

1. As detailed in the Strategic Housing and Employment Land Availability Assessment (SHELAA), one of the ‘evidence’ documents supporting the Consultation document [↑](#footnote-ref-1)
2. <https://baberghmidsuffolk.jdi-consult.net/documents/pdfs_4/bmsdc_jlp_consultation_document_(aug_17)_-_appendices_3_and_4.pdf> - see page 174 for Sproughton [↑](#footnote-ref-2)