

SPROUGHTON PARISH COUNCIL

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9th November 2017

Dear Sirs

BABERGH & MID SUFFOLK JOINT LOCAL PLAN CONSULTATION – SPROUGHTON PARISH COUNCIL RESPONSE

Sproughton Parish Council (SPC) has reviewed the Babergh/Mid Suffolk Joint Local Plan Consultation. The response is not just the views of the Parish Council but consolidates the feedback we have received from parishioners. Sproughton Parish Council held a Parish Meeting on 4th October 2017 to bring the Joint Local Plan consultation to the attention of parishioners and to listen to initial feedback. A working group was formed to review & analyze the plan and to draft a response. All of this information was presented to parishioners in a second parish meeting on 4th November 2017, along with details of how to make individual responses (both meetings were attended by 100+ people).

In addition to the above Sproughton Parish Council has drafted its own response. The letter below is one part of our submission to Babergh District Council capturing our feedback that did not fit neatly into the on-line portal. In addition to this we have submitted a response on line. The feedback below is structured in the same way as the consultation document to aid in processing & incorporation of our responses. We would be grateful if you could consider both parts together - this will provide a detailed, consolidated response to the consultation paper. If you require clarification on any point please do not hesitate to contact us.

1. **STRATEGIC OVERVIEW**

1.1. General

- 1.1.1. While recognising national imperatives and the shifting sands of Government planning policy, SPC considers that the vision of the Joint Local Plan (JLP) is short sighted. As a result, the document as a whole is built on weak foundations.
- 1.1.2. We have not attempted to answer all the consultation questions and as shown in our comments below, we do not believe some of them are appropriate.
- 1.1.3. Rather, we hope the Councils will progress to meaningful, detailed discussion of key points raised by parishes and towns across the region.

- 1.1.4. We understand that what local people want is not always what policy makers believe the wider community needs. Nevertheless, much more can be achieved with the enthusiasm and support of local communities than with the adversarial approach that has typified recent planning proposals. The only way of achieving that aim is by listening to communities and embodying neighbourhood needs and aspirations into a unifying vision within the JLP.
- 1.1.5. As set out in the section below, we believe creating a vision for a sustainable future depends on a grass roots approach. This means taking full account of the types of community to which people aspire before creating policy that can best fit national targets to the local vision. To achieve this delicate balance many councils in other parts of England conduct more primary research and provide greater transparency. One benefit of such research is to establish the parameters under which development can take place, at an early stage.
- 1.1.6. The requirement to test plans for viability is in accordance with NPPF 6 and 173. Assessing cumulative viability of draft Local Plans assists timely delivery of the final Plan and may well enable higher targets to be set in regard to affordable housing (see section 2.4 below). Conducting independent analysis at an early stage is thus a valuable aid in policy formulation. The DLP contains no evidence of such analysis which we believe should be commissioned¹.
- 1.1.7. We also note that other councils have no difficulty in publishing their Five Year Housing Land Supply data on a regular basis in a format that is relatively easy to understand – and which includes status – in a tabular form. Understanding the current position and what is required to improve it is a prerequisite to making informed decisions about future planning. We call upon the Council to deliver such data in a transparent format².
- 1.1.8. SPC intends this response to be a constructive step towards such a vision and looks forward to working with the Joint Councils so that it becomes a realistic objective.

1.2. Vision and Objectives

- 1.2.1. The draft Local Plan does not set out a large scale vision for the District. It comprises a top-down exercise in meeting Government-led numerical housing targets and avoids engaging in the debate of what that means for people in the District. For instance, it does not consider the type of discussion in north Essex where the solution to achieving growth has been to identify a garden village development to avoid filling up all the villages with new estates. In this way north Essex proposes to preserve the rural feel of the area, although it does come at the cost of blighting one location. At the other extreme is the concept of diverse and diffused expansion across the Districts, creating a merit based policy for controlled expansion of communities of all sizes, thereby creating sufficient economic mass for smaller communities to benefit from a wider range of services. Our communities deserve a broad-based discussion of different scenarios, not simply a re-hash of the status quo.
- 1.2.2. In place of a mechanical distribution of development we believe it would be more constructive to ground policy in a clear appreciation of what communities actually require. In order to achieve such a clear-sighted perspective it is necessary to carry out basic research, not just into what is needed at present but what will be required in the future. What are the opportunities and challenges faced by communities of all sizes? If

¹ eg Wealden Local Plan Viability Assessment 2017 – BLS Chartered Surveyors

² eg Wealden District Council 30 June 2017 – in accordance with NPPF footnote 11.

remote communities continue to house aging populations they may become increasingly unbalanced and difficult to service. Therefore, what is needed to achieve a mixed, sustainable community? Is it better infrastructure for home working? Perhaps improvements are required to a school so that it is better used by several parishes. At the other extreme what can be done to provide a good quality of life to residents of villages that neighbour large conurbations and see their identity eroded? Where is the policy provision for an impact assessment of development on key infrastructure requirements? Without such information at an early stage of policy discussion is informed planning decision even possible?

- 1.2.3. As an extension to this process the Councils need to consider the possibility there are areas that need growth to enhance their quality of life. For instance, are there areas that would benefit from local employment enterprise? Are there big infrastructure improvements that are needed (as discussed in section 2.12 below). Should communities that will benefit most from such improvements contribute by providing new housing to support that improvement? Instead of merely 'growing houses' and hoping that the infrastructure catches up, we should be thinking about the infrastructure we need and calculating the house building needed to fund it.
- 1.2.4. Babergh is a District with a rich rural heritage and tourist potential. How does this plan make the best of that potential to improve employment? And how does it preserve that potential so that it doesn't damage the employment already created by tourism?
- 1.2.5. The Plan does not address our transport problems. Currently roads run north and south and are becoming increasingly congested. Buses are not providing good coverage and trains also only operate north to south. This leaves our west/east stretching District dispersed with the focus on hubs in Ipswich, Bury, Colchester and even Manningtree. Should we rethink our boundaries to make our interest areas more cohesive democratically so that we can as voters properly consider our area or should we build on our focal towns of Sudbury and Hadleigh and improve our transport links accordingly? The Sudbury area is the only place in BDC with rail links to London, and they will go via the new Garden Town of West Tey. There is considerable opportunity to take advantage of that development and the links it will create.
- 1.2.6. As it stands, the JLP would be dependent on the development of greenfield sites. As discussed in 2.2 below, a call for sites has resulted in virtually all potential sites comprising agricultural land, much of it of good quality. To accept this as the basis for the JLP would be to accede to the least satisfactory scenario from the outset.
- 1.2.7. In short, the JLP is a mechanical exercise as it stands and misses the opportunity to create a vision for South Suffolk that would both enhance it as a place to live by building up facilities that currently don't exist (e.g. transport) and preserve the things that give it the character that the residents love. In place of creative, imaginative planning, we foresee an amorphous urban sprawl developing with no real benefits to the community as our infrastructure and employment deficits leave us as a commuter suburb.
- 1.2.8. SPC feel that the vision should at the very least include the following objectives:
 - 1.2.8.1. Babergh and Mid Suffolk should remain attractive, largely rural areas with thriving towns and villages a visually appealing, varied landscape.
 - 1.2.8.2. Towns and villages should each retain their distinct characters. Coalescence of settlements will be avoided.
 - 1.2.8.3. Growth should be proportionate and not dominating to preserve those distinct communities and the best of the counties landscape.

- 1.2.8.4. More effective use should be made of previously developed land to minimise the need to build on greenfield sites.
- 1.2.8.5. Wherever new housing is provided, it should respond to identified local needs including in relation to type, size, affordability and tenure.
- 1.2.8.6. All new housing should be to the highest design standards both visually, in the context of local character, and in environmental performance.
- 1.2.8.7. The adverse impact of new housing developments on areas such as traffic congestion, air pollution and social cohesion should be minimised through the scale and location of developments and the enhancement wherever needed of physical, social and environmental infrastructure. We feel this is especially important for the A1071 and B1113 where we feel all new developments including commercial developments, benefitting from the route into Ipswich should contribute proportionately to junction, traffic management improvements and a link/access to the A14 that avoids the congested Copdock A14/A12 interchange.
- 1.2.8.8. Natural, built and heritage assets should be protected and, wherever possible, enhanced.
- 1.2.8.9. Housing Growth to match actual Employment/commercial growth, not the other way round, and actual not envisaged with Employment/commercial growth being driven by proactive policies like incentives and improved infrastructure that will actually drive growth and not just an assumption that if property is put forward business will come.

1.3. Duty to Co-operate

1.3.1. Qs 5 & 6

- 1.3.1.1. The JLP Duty to Co-operate is seen solely in the context of; **Section 110 of the Localism Act 2011**, and **Part 2 of The Town and County Planning (Local Planning) (England) Regulations 2012**. It also includes reference to **Paragraph 156 of the National Planning Policy Framework**.
- 1.3.1.2. The framework of the JLP is to cherry pick the NPPF and to ignore not only the letter of that document but also its spirit of a bottom up process based on local involvement at the community level.
- 1.3.1.3. It is not clear where authority is derived to ignore the NPPF as a whole document. Many important sections within the JLP commence with a reference to paragraph 156 of the NPPF and this leapfrogs over the need to; *'reflect the vision and aspirations of local communities'* (para 150), *'be consistent with the principles and policies set out in this Framework'* (para 151), *'Early and meaningful engagement and collaborations with neighbourhoods'* (para 155). By starting at 156 the need to engage and involve local communities is not fully addressed. The present process of consultation is not a substitute for proper engagement³.

³ Section 110, Localism Act 2011 – see <http://www.legislation.gov.uk/ukpga/2011/20/section/110/enacted>
 Part 2 of The Town and County Planning (Local Planning) (England) Regulations 2012 - see <http://www.legislation.gov.uk/uksi/2012/767/regulation/4/made>
 National Planning Policy Framework- see <https://www.gov.uk/guidance/national-planning-policy-framework>
 Delivery (pp 25)

2. DELIVERY

2.1. Housing requirement

- 2.1.1. No alternatives are proposed for the housing requirement which is set at the OAN level.
- 2.1.2. The main evidence provided is the Brett Associates report⁴. However, this report contains several significant caveats regarding potential impacts on the eventual requirement. For example, the base data has no assessment for scenarios concerning Brexit. The Government's preferred methodology (currently and subject to consultation) is based on earnings to property price ratios. As this measure fails to allow for key factors, such as wider migration from high priced areas. Domestic migration is predominantly from London by commuters or retired home owners who are cash rich from the sales of their London properties, they buy top end homes pushing up the median value of local house sales. However, their incomes are not local so they do not push up the median / average wage. This distorts the affordability factor calculation giving an unjustified increase in Housing Need Calculations. However the data also highlights the significant lack of affordable housing which based on financial deprivation in rural areas would indicate a significant lack of an affordable housing in rural areas that needs to be addressed.
- 2.1.3. It is regrettable that the Brett Associates Report does not provide sufficient, well targeted original research to provide an insight into these issues.
- 2.1.4. Notwithstanding the fact the Councils may be forced to follow a flawed policy imposed by national government to meet its own ends, and which may also help to meet the Council's own financial shortfall, failure to engage fully with local communities on this issue will continue to undermine the credibility of the JLP and the Councils themselves.
- 2.1.5. Projections are also based on commercial development aspirations which we feel are flawed. The national push to promote business along the new HS2 route into the midlands and northern powerhouse is competitive with the JLP aspirations and in such a climate such aspirations are unrealistic unless the JLP actually has competitive and realistic policies to create/migrate business into the area, which it doesn't. It just proposes it will happen. Whilst consideration and contingency plans should be included to possible commercial growth it should not be the basis of housing growth as housing growth without employment will degenerate our communities into even higher financial deprivation.
- 2.1.6. Consideration should be given to replacing stuck sites with contingency sites but these must be replacement and not additional, original sites to be taken out of plan. Regular review of demand required checking the guiding principles of type, tenure, place and need (local) – should trigger need for reserve sites.
- 2.1.7. Housing need appears to be based on projected 1.03 persons per dwelling (past average has been 2.3) therefore 7,820 is over-stated
- 2.1.8. We completely disagree with the arbitrary scoring system adopted for hierarchy. We would welcome a debate/consultation at Parish level to reconsider the criteria adopted. Positive scoring factors in this Hierarchy assessment are actually negative factors against Creeping Coalescence (i.e. the erosion of as communities' individuality) they therefore fly in the face of the NPPF and unfairly place Sproughton into the main settlement types. Also scoring takes no account of capacity (i.e. School sizes etc.) or connectivity in relation to travelling time or facility (distance is not a fair comparison).

⁴ Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Part 1 May 2017

- 2.1.9. In balance to the unfair hierarchy calculations, impact assessments should be adopted in much the same way as they are conducted for large retail facilities, to consider community identity (creeping coalescence) / landscape / public facility / public amenity / visual amenity (design) / infrastructure at a transparent public level.
- 2.1.10. We therefore ask the Councils to engage with communities and Parish/Town Councils on the detail of housing requirement.

2.2. Spatial distribution

- 2.2.1. The consultation presents four options for the distribution of housing development over the plan period. We regard this as a divisive approach, encouraging responses based on inference of what the local consequences might be, rather than a more strategic and objective analysis.
- 2.2.2. This analysis should include predicted employment trends over the plan period, methods of working and opportunities to encourage rural enterprise. While the evidence base indicates a need to accommodate a shortfall of houses in Ipswich there are significant problems with this analysis⁵. The report in question makes no allowance for changes in the economic background. For example, forecast expansion of the Haven Gateway ports has stalled, in part due to success of the Thames Gateway. Ipswich has a large number of incomplete apartments and there is limited evidence of market pressure to complete them. Ipswich also has significant infrastructure problems which may be a limiting factor. Recent growth data appears to be confused by the 'crash and burn' impact of 2008 which was particularly severe in central Ipswich. Growth is thus shown against a low base. The need to merge villages on the edge of Ipswich into the suburbs is therefore unproved. It is also undesirable for many reasons, as explained throughout this response.
- 2.2.3. Similarly, a better understanding of projected trends in the rural economy and home based working would enable informed choices to be made on whether more rural areas of the district(s) can sustain any significant growth without simply creating unsustainable increases in car based commuting to traditional employment centres.
- 2.2.4. Land shown as potentially available for development comprises 83% greenfield and 78.87% farmland. The submission of greenfield sites is frequently cost driven. The JLP makes no attempt at presenting suitable means of encouraging brownfield development.
- 2.2.5. Under the JLP premise a small number of villages would bear almost the entire impact of housing development, to the point where their character would be altered completely. Most small communities, including those currently classified as countryside and which might benefit from proportionate expansion, have no potential allocation at all. It is quite possible that no sites have been offered in some areas because under existing policy they would have to meet 'exceptional' criteria. Neighbourhood Plans which may have assisted in this regard have often been seen as a 'waste of time' by parishes as there is a perception they are ignored at the planning hearing, or cannot be implemented due to the lack of a five year land supply.
- 2.2.6. The scoring system used is somewhat arbitrary in how it allocates points to particular items. The results just happen to point towards the disposition of sites that have come forward rather than any realistic consideration for housing need and rural growth considerations at a parish level. In short the options proposed just appear to be a mechanism to justify the major sites that have come forward.

⁵ Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Part 1 May 2017 paras 2.3 – 2.10

- 2.2.7. There is no option for proportionate development to allow for carefully planned 'organic growth' of existing communities. Proportionate development is something that is innately fairer to people. It is reasonable and desirable to assume that developing families and communities might want to grow within their communities keeping families and communities together. The growth required represents an average of 9% growth over 20 years across BDC and that is quite acceptable and if evenly spread would have little impact on infrastructure other than perhaps at pinch points which might be improved using CIL or 106 payments. But this very obvious option is not considered.
- 2.2.8. Option 4 on the face of it appears radical but perhaps not so when the West Tey development is considered. A new Garden town/village located where it might also bring better infrastructure to an area could be a benefit to the district. In that respect somewhere near Sudbury would work well with West Tey for rail links and bringing better services into the middle of Babergh. Near Gt Blakenham would have the potential advantage of a new rail station and access to the A14 and Somewhere between Belstead and Bentley and between the A12 and Mainline Railway could provide a new railway station with adequate parking to serve Ipswich and Babergh.

2.3. Housing types

2.3.1. Qs 16 - 24

- 2.3.1.1. Safeguards are required to ensure easier purchase for local residents who actually need a home, or a move towards building genuinely affordable homes, including well placed council house building. Development by smaller local house builders should be encouraged rather than the national housing developers who provide 'cookie cutter' developments. Local house builders have 'skin in the game' as they are local, likely to be more aware of area need and provide dwellings tailored to the vernacular.
- 2.3.1.2. The known demographic indicates there are many older people who require bungalows or ground floor apartments. The former are now a rarity on new build sites – this should be addressed and actively considered when reviewing planning applications.
- 2.3.1.3. A policy supporting the development of residential/nursing homes and specialist housing (sheltered, enhanced/sheltered and extra care) should also be considered as described in Option HM3.
- 2.3.1.4. Starter homes are in great demand but are avoided by many builders on the basis larger homes provide a better return. A policy to encourage development of starter homes may be required.
- 2.3.1.5. Council should consider the introduction of a register of vetted local residents in need of affordable or starter homes, possibly run alongside council housing lists, where builders would be required to give first refusal to people on the list. This would go some way to ensuring that the local housing need for affordable/starter homes was addressed rather than allowing investors into the game which reduces the availability of smaller homes and increases the communities' dependence on rented accommodation.
- 2.3.1.6. Custom/self-build homes are also a realistic opportunity to add to the character and richness of a community, especially in villages and hamlets. Individual or small clusters of self builds create more work for local builders and trades, keeping wealth within the local community. They create character and interest due to the genuine diversities of design and construction which matches

the character of Suffolk and village communities. They tend to be what is needed because they are built by people who need them.

2.4. Affordable housing

- 2.4.1. The draft plan proposes the total need for affordable housing is just 19.4%. Original research data has not been supplied to support this proposal. SPC believes a higher percentage of low cost market housing is required in order to maintain balanced communities that are sustainable in the longer term. The Districts need homes that are affordable for young couples and families. This can be achieved through a mix that includes properties managed by housing associations, parish trusts and councils as well as the private sector as part of larger schemes. However, larger property developers have not demonstrated an ability or desire to meet this need. The massaging of viability numbers and the so called 'ground rent scandal' has demonstrated a cavalier attitude to the needs of 'ordinary' households. As stated above, the assessment of viability at the Local Plan stage can help ensure developers have a clear mandate to meet their obligation from the outset.
- 2.4.2. Against a previous demand of 35% BDC actually only achieved 23%. Therefore, if the same level of success is achieved, for a 20% requirement we might only expect 13% delivery which is a fraction of what is actually required. It is therefore clear that the JLP needs to give greater consideration to the delivery of truly affordable homes.
- 2.4.3. The affordable housing need is further demonstrated by the increase in rented properties of 71% indicating an increase in buy to let investors buying smaller homes but a decrease in the ability of people to buy their own first homes. There is also a projected increase in single parents of whom a large proportion will be needing affordable housing, and an increase in deprivation especially financial deprivation in rural areas due to a lack of affordable housing in rural areas indicating a need to focus on rural areas in affordable housing provision. Finally the increase in affordable housing need is also demonstrated by the increasing housing affordability index for Babergh as housing prices are dramatically leaving average wages behind.
- 2.4.4. Local communities can have an essential role in determining the need for affordable homes. Neighbourhood Plans are one mechanism for collecting data and where these are not available it should be possible to initiate local surveys by parish councils or other community groups. This is a primary example by which a 'grass roots' approach, rather than a 'top down' formula, can meet the District's needs.

2.5. Rural growth and development

2.5.1. Qs 26 – 28

- 2.5.1.1. Application of current policies designed to facilitate rural growth is widely discredited across the districts. Planning committee decisions often appear arbitrary, poorly argued and ignore local views. This failure suggests policies are at fault.
- 2.5.1.2. Sustainable development: at the heart of planning? This is not a recommendation to build but to build wisely. There has to be a realistic prospect that houses are needed and suitable for a given location and it would appear from the surveys done that Rural housing is needed by the expanding local resident population
- 2.5.1.3. We suggest the Councils consult on this section in greater depth and reconsider the premises on which the JLP options are based. Overall we consider

they are too restrictive and result in too many instances of “unintended consequences.” Is there, for example any practical reason why hamlets that could be considered for proportional enlargement should be road facing and of more than 10 houses when the county has clusters on unadopted roads, away from the highway, that could be sensitively enlarged? Merit based criteria would be required and due consideration should be given to the neighbourhood viewpoints. Such locations might be ideal for genuine self-build projects where the builder is likely to want to be a good neighbour.

- 2.5.1.4. At present the treatment of rural applications takes little account of the housing mix, local housing requirements or a host of other relevant attributes. Better guidance of the nature of rural sustainability would also be beneficial.
- 2.5.1.5. Proportionality is key; The JLP proposes a 9% Housing need over 20 years. This equates to one new home in a ten house hamlet, but why stop there. Such growth is potentially desirable naturally matching the growth of any micro community. Generally children grow older and want their own homes within their community, why shouldn't the provision and burden be spread evenly at 9%, by hamlet, village and town.
- 2.5.1.6. However we would support a limit on development at a level that does not dramatically change any community. with every effort made to preserve the best of the local landscape, views and ecology
- 2.5.1.7. In summary, the options presented fall short of what is required.

2.6. Accommodation Needs of Gypsies and Travellers

2.6.1. Q29

- 2.6.1.1. We support Options GT1 and TS1 but consider the latter sites might be multi purpose, providing some local community benefit when not in use. Could such sites be managed by local parishes and designated for showpeople's priority use but bookable so that parishes could use them to organise events when not required? Could negotiated stopping places also be designed for heavy goods vehicle stopover places when not in use by travellers?
- 2.6.1.2. Although policy relates to both BDC and Mid Suffolk the report suggests that need is M.S. The Cromer incident occurred when travellers gathered in large numbers therefore, limiting sites to short stay and small number of vehicles (say 3 days/3 plots) with sites well spread apart (say 20 miles) is safer for communities.

2.6.2. Q31

- 2.6.2.1. Local tradition has established sites for long term moorings. Few other locations appear to offer sustainable sites but there might be some, subject to control of vessels that moor there.

2.7. Economic Needs

Qs 33 - 41

- 2.7.1. The jobs forecast does not support the level of housing growth suggested. However, the JLP turns this on its head and suggests if more houses are built, more jobs will be required. Is this 'Build it and they will come' wishful thinking? More evidence is needed.

- 2.7.2. Proposed employment land is already considerably in excess of demand. Moreover, recent planning decision experience indicates at least some of it is in the wrong place i.e. not where industrial developers want to build.
- 2.7.3. The Sugar Beet Factory site alone is already more land than the projected requirement for employment land for the whole of Babergh, all being delivered by Sproughton, which is already a disproportionate community impact compared to other Parishes. With a total oversupply of 187 hectares when the identified need is only 12.3 hectares.
- 2.7.4. The commercial growth projections are just statistically based on historic and out of date (pre Brexit) data. Competition for commercial growth is Nationwide and the Midlands and Northern Power House areas have a considerable advantage with better roads and rail like HS2. But these projections are backed up by no practical policies or strategies that might promote the commercial growth claimed.
- 2.7.5. In practice, sites for specific type of business need to be close to key resources or infrastructure. Access to major routes is important for many manufacturers. Sites close to the A14 would thus be preferable for industrial premises but to date these sites have been allocated for housing.
- 2.7.6. Need for Northern Ipswich Bypass. Improvements to A1071 junctions through Sproughton. A1071 link directly with A14 to improve access into developing BDC area. Better Railway Service (expensive service and Ipswich station has limited access).
- 2.7.7. Private sector building has been constant for decades, its Council building that has dropped off. We would support a policy for the Council to start building themselves.
- 2.7.8. We feel that the excess of commercial sites that have come forward could be used for retail parks / leisure parks if there was a shortage of retail areas in town centres or where the parking / vehicle access needs for specific retail businesses could not be accommodated in towns centres.
- 2.7.9. We feel that the excess of commercial sites that have come forward may be suitable to provide housing need especially where brownfield sites are available.
- 2.7.10. In short, the options and questions in this section of the JLP appear to be backward looking and out of touch with the requirements for more flexible and diverse modern enterprises.
- 2.7.11. The Councils should also consider operating a database service to assist developers in locating the best and most appropriate location for their business. This should include offers of smaller sites with potential.

2.8. Town Centres and Retail

Q45 - 50

- 2.8.1. As the JLP recognises, retail requirements continue to change, driven in large part by evolving shopping habits and the growth of leisure businesses and food outlets.
- 2.8.2. While limitations are required it is self evident that failure to adapt to market requirements leads to malaise and loss of business to other locations.
- 2.8.3. Town centres lose business to a range of out of town enterprises, from farm shops to rural retail developments. Flexible, mixed use allocation seems essential if the vitality of our local centres is to be preserved. Parking and access remain a critical issue and with older segments of the population also having significant disposable income maintaining good transport links and appropriate access is increasingly important.
- 2.8.4. As in 2.7.9 there is a possibility to use commercial sites for retail but these would best be suited to convenience retail than comparison which better reflect the town centre experience.

2.8.5. Impact assessments on retail sites of 2500m² would appear appropriate in relation to Ipswich, but for the smaller market towns 400m² would appear more appropriate.

2.9. Environment (Biodiversity)

2.9.1. Q51-Q54

- 2.9.1.1. The JLP initially makes reference to those areas that are legally protected for their biodiversity. Here we see the first references to exceptions due to public interest.
- 2.9.1.2. One of the problems with most wildlife legislation in relation to development is the references to 'public advantages outweighing any adverse biodiversity impact'.
- 2.9.1.3. The problem with such guidance is it is subjective and the responsibility to enforce/ police these regulations is devolved by Natural England to the local planning authority. It is the LA's decision as to how closely the developer has to look for biodiversity in the first place, so if you don't look you don't find. They are therefore, benefactor, regulator, enforcer, judge and jury which we believe puts their officers in a difficult position i.e. there is a conflict of interest.
- 2.9.1.4. The JLP talks of linking biodiversity at a landscape scale which is encouraging, the strategy to protect the main wildlife sites from recreational disturbance and mitigation measures.
- 2.9.1.5. However as SSSI and AONB have national protection policies it is primarily the locally designated sites to be considered.

2.9.2. Q51

- 2.9.2.1. Option BIO2 appears, with some reservations, to be the better option. The concept of linking biodiversity at a landscape level in the context section is encouraging. Too often green corridors are nothing but a narrow footpath. One concern is that the 2012 Babergh Green Infrastructure Strategy is completely out of date. It also fails to recognise that most of Babergh is private land without public access. Biodiversity often only comes to notice once access to public or detailed surveys are undertaken.
- 2.9.2.2. We would recommend much more robust and critical assessment of SUDS on new developments feeding into river valleys and Flood plains. SUD's requirements only consider a single severe weather event of the type that might cause flooding within a development. They do not consider an extended weather event like the passage of a sting of heavily moisture laden Atlantic depressions over several days. These are the type of events that will cause flooding 'downhill' of a development.
- 2.9.2.3. SUDs should not reduce additional flood risk, they should eliminate any additional risk and this applies especially to the homes, villages, floodplains and rivers downhill from a development.

2.9.3. Q 52.

- 2.9.3.1. Visual impact is a big consideration. Wind farms can be sited offshore as we have the advantage of a shallow North Sea off our coast. Solar Farms can be sited where they have little or no visual impact on the landscape. However care should be given to the energy benefits against the loss of food production which is also a green benefit to be preserved.

2.9.3.2. The consultation document recognises that: *local planning authorities are required to ‘... adopt proactive strategies to mitigate and adapt to climate change’; and that the planning system should ‘support the transition to a low carbon future in a changing climate...and encourage the use of renewable resources (for example, by the development of renewable energy)’.*

2.9.3.3. These principles should be at the core of any policy criteria. That is to say the Policy should take a proactive approach to the development of renewable energy, not only in terms of stand-alone sites, but also to retrofitting on existing buildings and integration into new build. It is quite right that renewable energy installations need to be sensitive to the landscape and minimise visual impacts. However, such matters should not be used to override the required “proactive approach”.

2.9.3.4. The government provides extensive guidance⁶ on how to incorporate renewable energy into local plans which states that: *When drawing up a Local Plan local planning authorities should first consider what the local potential is for renewable and low carbon energy generation. In considering that potential, the matters local planning authorities should think about include:-*

- the range of technologies that could be accommodated and the policies needed to encourage their development in the right places;
- the costs of many renewable energy technologies are falling, potentially increasing their attractiveness and the number of proposals;
- different technologies have different impacts and impacts can vary by place;
- the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources. Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver.

2.9.3.5. The full “considerations” that are required as a precursor to the Policy should be incorporated into the Policy and made available for consultation.

2.9.3.6. When considering the new build of larger groups of houses and other buildings there are many benefits from collective energy (power and heat) schemes. This can involve community heating schemes and, through small scale micro-grids, localised electricity generation, storage and distribution schemes. The technology is changing fast here, as are the cost / benefit ratios, and the Policy needs to be flexible to recognise this.

2.9.4. Q 53.

2.9.4.1. Yes, especially given the fact that this area has one of the lowest rainfalls in the UK.

2.9.5. Q 54.

2.9.5.1. The consultation states that: when setting any local requirement for a building’s sustainability, do so in a way consistent with the Government’s zero carbon buildings policy. Our understanding is that the Government’s zero carbon buildings policy no longer exists.

- 2.9.5.2. However, as the consultation recognises, the March 2015 Ministerial Statement enables local planning authorities to require energy efficiency standards that exceed Building Regulations provided these do not exceed the requirements of the level 4 of the former Code for Sustainable Homes.
- 2.9.5.3. It was the government's stated intention that this approach was to be incorporated into Building Regulations but it appears this may not have been expedited. If that is indeed the case, then we strongly recommend that Babergh and Mid Suffolk incorporate this option into the Local Plan.
- 2.9.5.4. Such an adoption would not only recognise the 'proactive' stance required of LAs, but also be in line with the policy pathways outlined in the governments Clean Growth Strategy published on 12 October 2017.
- 2.9.5.5. As a result of climate change, more extreme weather conditions can be expected, and everywhere is going to be more susceptible. (SUD) schemes should be incorporated in the Local Plan to deal with flash flooding events, but need to be more robust to deal with prolonged (several day) heavy weather events. SUD's should not be built to reduce flood risk, they should remove flood risk especially downhill of a development where innocent homes would be threatened over long periods of heavy rain.

2.10. Landscape, Heritage and Design

2.10.1. Q 55- Q59

- 2.10.1.1. District Councils could agree to consult specifically on landscape impacts of developments more closely with local parishes at an early stage.
- 2.10.1.2. Local designations, in particular 'Special Landscape Area', should be strengthened. While frequently referred to in planning hearings the impact to date has been negligible. This is in sharp contrast to common practice in other districts where similar local designations are enforced by officers and planning committees alike⁷.
- 2.10.1.3. In relation to landscape character types the land from the Holliday Inn down through Chantry Vale, Sproughton and into the Gipping valley is only found in one other place in Suffolk - Dedham Vale AONB.
- 2.10.1.4. Being on the edge of Ipswich it is an ideal landscape for Recreational / Nature walks etc. which would divert footfall away as required from the SSSI sites that need protection under BDC own co-operation strategy
- 2.10.1.5. The Gipping Valley and the landscape leading into it, especially Chantry Vale, might well benefit from being designated as a Landscape Project Area to ensure the best of the landscape within walking distance of Ipswich is protected for future generations as Ipswich expands around it.
- 2.10.1.6. It is a simple fact that a single house may add to the richness of a landscape whereas an estate completely destroys it, no matter how well it is integrated and yet the council appears to enforce landscape policies on small or single builds that have little impact but will bend the rules for a big developer. This has to be resolved and Landscape and Landscape designations and views should be a priority in planning in this rural community

⁷ For example, Bolton District Council decision on application at Ditchers Farm, Slack Lane, Westthoughton, October 2017 – 'Other Protected Open Land'.

2.10.1.7. We don't know how important a heritage asset will be to future generations. Stonehenge lay abandoned for 5000 years! They should be cared for if we can, neglected if we can't but never wilfully removed or destroyed. Heritage assets would best be identified by local parishes and any changes to their status or relevance should be considered at the same level.

2.10.1.8. If there is a clear defined heritage asset that may be compromised by enforcing some climate change policies then the planning department should have some scope to ensure the asset is not spoiled. A typical example might be where a listed building has steel framed windows that are part of its character. If some had to be replaced it would be appropriate to maintain that character rather than require energy efficient alternatives.

2.11. Design

2.11.1. Q60

2.11.1.1. The Suffolk countryside is dominated by diversity in design. This has occurred due to the passage of time but also because most building has taken place on a small scale. The Suffolk Design guide does not address this aspect of the county's character and it is at odds with the objectives of large developers who wish to standardise their designs and materials in order to maximise returns.

2.11.1.2. The spirit of the market towns and Hamlet type communities is the prevalent character of Suffolk, and design would fit in better if more effort was made to blend in with this traditional character.

2.11.1.3. The monotony of standard estate design does not lend itself favourably with the villages, towns or countryside of Suffolk and every estate built detracts from the character of the county

2.11.1.4. Even in an estate development much more could be done to preserve the local character and provide visual interest and a village atmosphere. One option would be for estates to be divided up into small design cells of around 10 homes. Each cell should be sufficiently different so as to give the impression of being built by a different developer, and even built in a different period. This would match the character of our county.

2.11.2. Q61

2.11.2.1. All development should be designed to blend into the countryside, protected or not. The dominant visual features should be the landscape that existed before the development, not the development itself.

2.11.3. Q 62.

2.11.3.1. Our thoughts are of the Wolsey Grange application which had three story townhouses around its perimeter which would dominate the skyline both from the Chantry Vale valley, Chantry Park and the surrounding countryside. Apparently Taylor Wimpey's did this to make the development a statement.

2.11.3.2. The Suffolk one collage is similarly dominant. These are conceited and selfish aims completely at odds with the special landscape policy for that site, and the council policy to preserve the best of our views and landscapes. It is quite a disappointment to gaze around the green Suffolk countryside and have your vision drawn to a big white square building set on top of the biggest hill.

- 2.11.3.3. Suffolk One should have its form broken up by the use of green shaded panels or bands to prevent its dominance of the landscape.
- 2.11.3.4. It should be a design objective that buildings / developments should be blended into the landscape using every practical means. Typically by putting low rise buildings around its perimeter, and any desire to make a statement of a development should be restricted to design that does not impose itself on the landscape.

2.12. Infrastructure

- 2.12.1. Babergh recognises that development needs infrastructure and will prepare an Infrastructure Delivery Plan (IDP). However, until that is done we cannot comment on its merits. In most cases the Councils are not the providers and infrastructure must be coordinated on a County or region-wide basis.
- 2.12.2. It is essential that infrastructure is provided on a timely basis and that it is a condition of development that it will either proceed or at the very least keep step with the development. Wider works must also be considered at a formative stage and fully assessed before consent is granted.
- 2.12.3. Planning permission should only be granted if there is some legally binding agreement that any identified infrastructure services WILL BE delivered as will the timing of its delivery. Guarantees should be structured such that they cannot be cancelled or avoided.
- 2.12.4. We fully support and indeed, consider it essential that each scheme considers both the existing infrastructure commitments and cumulative impacts from other developments in a locality.

2.12.5. Q 63

- 2.12.5.1. Since no actual strategy associated to INF2 is stated it is difficult to say which is appropriate but if that strategy dissolves their responsibilities it would appear to be inappropriate.
- 2.12.5.2. But if adopted with the condition that all formally agreed infrastructure agreements are adhered to.

2.12.6. Q64

- 2.12.6.1. Education, Health Services, Highway Infrastructure, Flood Risk management and resilience.

2.12.7. Q 65

- 2.12.7.1. The primary requirement is improvements to the road network and to public transport, ensuring there is adequate education and healthcare provision to meet existing and planned growth in communities, Water and Drainage, Energy Provision, Leisure Facilities, Green /Nature/ Landscaped Infrastructure and continues improvements to communications, including broadband.

2.12.8. Q 66

- 2.12.8.1. For growth scenarios to be supported there must be a realistic expectation that planned improvements to infrastructure will be delivered and that when in place they will perform as required. To date the track record across the region is patchy at best.
- 2.12.8.2. Ipswich Northern Route Project, A12 and A14 road improvements

- 2.12.8.3. Highway improvements to the commuter routes into/out of Ipswich from the Districts, especially the A1071 and B1113
- 2.12.8.4. Rail network upgrades, parking, Stations
- 2.12.8.5. Flood management and alleviation, Upgraded household waste recycling provision,
- 2.12.8.6. Better Broadband for Suffolk, both basic and enhanced services
- 2.12.8.7. School places in the form of expanded or new primary and secondary schools– location to be determined.
- 2.12.8.8. Healthcare infrastructure such as ensuring there are the necessary numbers of GPs and Dentists and their associated surgeries to support both the current and the planned population increases.

2.12.9. Q 67

- 2.12.9.1. It is our observation that the Planning Department of BDC has found it hard to enforce the policies relating to infrastructure provision it has. Changing policies to ones that include subjective criteria will only legitimise departures from best policy and give developers hungry to maximise profits every argument they need to oppose policies and develop what they want to rather than what is needed and meets the relevant policies.
- 2.12.9.2. The first paragraph under Managing Infrastructure Provision heading reads “Planning Permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development.”
- 2.12.9.3. Planning permission should only be granted if there is some form of guarantee that the infrastructure services WILL BE delivered or the necessary funds are ring-fenced to ensure the cumulative infrastructure needs arising from existing and new developments will be completed in good time.

2.12.10. Q 68

- 2.12.10.1. The answer to whether there should be a separate policy for education and healthcare depends on the policy.

2.13. Healthy Communities

- 2.13.1. Healthcare in the Ipswich area is already under significant stress. In the UK as a whole there are not enough GPs, not enough doctors wanting to become GPs and steadily increasing demand. How will more GPs be found to provide healthcare to an increased population.
- 2.13.2. An increase in elderly residents means more carers are required. In 20 years’ time it is estimated that there will be a deficit of ½ million carers.
- 2.13.3. The councils are currently producing an overarching Leisure, Sports and Physical Activity Strategy. Their preference is to relate requirements to identified needs rather than set a prescriptive requirement.
- 2.13.4. This seems logical but further detail is needed.
- 2.13.5. Whilst we agree with the policies outlined here, we are concerned that any existing individual communities should not lose their community identity and cohesion as a result of ‘creeping coalescence’ arising from the inappropriate location of new developments.

2.13.6. We consider greater attention needs to be given to avoiding the 'swamping' of existing communities with excessive developments. We suggest that more emphasis is given to ensuring that any necessary developments are spread more evenly over the District as a whole, rather than being concentrated in particular communities.

2.13.7. Q69.

2.13.7.1. The strategy of the Plan should be flexible enough to address additional social issues which will arise during the lifetime of the document; for example the needs of an increasing elderly population.

2.13.7.2. Financial Deprivation is identified as an issue in rural areas due to lack of affordable housing. A push for good value affordable and starter homes in rural areas needs to be a priority.

2.13.8. Q 70.

2.13.8.1. These should be further developed in the light of any issues that arise or change as we move through the Plan period. For example, it is impossible to predict the approach necessary to deal with any BREXIT issues and therefore the Plan needs to be flexible enough to mitigate these.

2.13.9. Q 71.

2.13.9.1. We believe the areas highlighted in the Plan need to be protected and preserved going forward

2.13.10. Q 72.

2.13.10.1. Flood plains could provide areas of open recreational space (without structures or equipment) that would be available for a majority of the time for community use.

2.13.10.2. Provision of Natural areas, Landscape and country park areas integrated by wildlife greenways that are more than just paths with shrubs / trees to provide cover for wildlife. Ideally close to the main residential areas for the provision of leisure walks etc. The Gipping Valley, the countryside views from it and valleys like Chantry Vale leading into it should be considered as landscape / wildlife projects to ensure the best is preserved for future generations residing in urban areas.

2.13.11. Q 73.

2.13.11.1. The work currently being undertaken by the Councils should identify the need for any additional facilities.

3. PLACE

3.1.Functional Clusters

3.1.1. *'Functional cluster' is a way of looking at the existing spatial geography based on how communities interconnect. Settlement hierarchy is then derived from Functional Cluster. Classification of a community is an important factor for these purposes and relevant to determining the approach to planning.*

3.1.2. *This approach is not appropriate. Planning policy should not be based on artificial constructs, which over emphasize 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.*

3.1.3. Q74:

3.1.3.1. *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.*

3.2.Settlement Boundaries

3.2.1. *Settlement boundaries are used to identify where the principle of development has been established, a threshold of ten related dwellings is applied. Land outside of this settlement boundary is countryside.*

3.2.2. *The JLP view is that they need redrawing to allow rural growth opportunities.*

3.2.3. *Whereas some factors considered are appropriate the new boundaries have been drawn to include development sites that have not been delivered. Further thought needs to be given to planning consents that have been granted but not yet delivered.*

3.2.4. *Extensions to a settlement boundary are inappropriate if existing permissions have not been delivered.*

3.2.5. *We also feel that the 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.*

3.2.6. Q75:

3.2.6.1. **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.*

3.2.7. Q76:

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

3.2.8. Q77:

- 3.2.8.1. 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.

3.3. Potential land for development

- 3.3.1. The JLP proposes sites across the district which have come forward for development and which they provisionally assess as being technically acceptable. There are significantly more proposed than is needed for the 20 year supply so clearly some will be eliminated based on the strength of arguments and opinion both on validity and quantity.
- 3.3.2. The consultation effectively offers an adversarial process to support or object to sites in different locations so the number of responses from Sproughton will affect the outcome. Would this be 'divide and conquer'??
- 3.3.3. As a general point 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 coalescence' 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:
- 3.3.4. 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. Sproughton would merge with Ipswich and on the other side Bramford – creeping coalescence should be avoided.

3.3.5. 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 (<i>employment</i>)
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 (<i>mixed – some employment</i>)

3.3.6. **SS1024**: Site not appropriate for development

In addition to those matters identified as requiring further investigation in the site assessment summary (highways, cordon sanitaire 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 & designated as an SLA. The mix of landscape characteristics is similar to Dedham Vale, and AONB
- 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.

3.3.7. **SS0721**: Site appropriate for development, subject to the scheme proposed

It is not clear to local residents, however, why – given the size of the site and the enterprise zone only covering part of the site why a portion may not be allocated to housing.

3.3.8. **SS1023**: Site not appropriate for development.

In addition to those matters identified as requiring further investigation in the site assessment summary (highways, cordon sanitaire 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 & designated as an SLA. The mix of landscape characteristics is similar to Dedham Vale, and AONB
- 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 Sroughton village, which would threaten the identity, if not the very existence of, Sroughton village.

3.3.9. SS0191: Site partially appropriate for development

Some of the site (specifically, in the south-east 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 sanitaire 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 & designated as an SLA. The mix of landscape characteristics is similar to Dedham Vale, and AONB
- 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 Sroughton village, which would threaten the identity, if not the very existence of, Sroughton village.

3.3.10. 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 Sroughton.

3.3.11. SS0299 Site is not appropriate for development

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.

3.3.12. 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.

3.3.13. SS1026 Site is partially 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. What would be more appropriate is development of some housing along the London Road in the South East corner of the site as opposed to the originally proposed employment

3.3.14. Selection Criteria

The JLP contains no information as to proposed selection criteria for potential sites. The request for sites seems inappropriate in a document that invites communities to help develop the policies that will define how sites are evaluated and which areas should be targeted.

3.3.15. Q78:

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 coalescence' 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.*

3.3.16. Q79:

No

3.4. Community Choice and Neighbourhood Plans

3.4.1. The JLP states: “The Councils ... encourage local communities to prepare neighbourhood plans, particularly where those communities are identified for growth.” This sentence would appear to sum up the problem with the document as a whole. If judgement has already been made about the future of neighbourhoods, community choice is limited and the neighbourhood plan is constrained. Plans must obviously submit to national planning policy (NPPF) but if the JLP is truly open to meaningful input from local residents, presumptive statements are unhelpful.

3.4.2.NPPF par 155 sets out a clear principle:-

Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the local community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made. District Councils must be clear in their support for Community/Neighbourhood Plans and demonstrate how they have taken on board communities wishes and if not, why not.

3.4.3.It is vital that the final Local Plan is supported by the decision making process. Even in light of increased litigation on planning cases nationally, the recent history of planning decisions in Babergh is far from satisfactory. Policy implementation must be fit for purpose at every stage and trust in the decision makers needs to be restored if the District Councils are to regain the confidence of the wider community.

4. SOME OTHER ISSUES TO CONSIDER

4.1.Five Year housing supply

4.1.1.It is felt that a primary reason for creating a new JLP is that the councils are failing to provide the 5 year supply of development sites. This failure may result in government taking over administration of planning applications. However this in itself throws up a multitude of questions not addressed in this JLP:-

- 4.1.1.1. This is becoming a problem nationwide, it is possible that the Government could set up a department to deal with all the planning applications from the massive number of councils that are failing?
- 4.1.1.2. What is the main problem here? Would applications based on NPPF be such a hardship when BDC is proposing policies to circumvent the environmental and social policies of the NPPF and rarely abides by their own policies if it disadvantages developers. The basic NPPF may be better.
- 4.1.1.3. Councils are no longer public services, they are businesses, only the elected councillors are there to represent the community. Their primary interest is profit and loss.
- 4.1.1.4. The electorate are bound by law to pay their council tax, nothing done good or bad by the council effects that income other than that by increasing the electorate they increase their income.
- 4.1.1.5. On the other hand, interaction with commercial interest can generate income so for housing that will include new homes bonuses, planning fees, 106 payments, CIL etc. These are the areas they can generate extra income.
- 4.1.1.6. If they lose their authority over planning, they will loose a large chunk of income.
- 4.1.1.7. But if the council is failing to achieve the 5 year supply now and builders are failing to build (over 2000 approved home applications laying dormant in BDC area) why are they not setting an achievable Housing Need objective? If they can't achieve what they need now how can they expect to achieve even more? Why have they accepted data that is unreliable because it makes no consideration for Brexit when a more up to date analysis would almost certainly provide a smaller growth figure that might be achievable.
- 4.1.1.8. Perhaps the answer is that the bigger the numbers the bigger the opportunity to generate income regardless of what the electorate wants.

4.2.Growth

- 4.2.1.The data used to forecast growth is too historic as it makes no consideration for the effects of the Brexit vote, it is therefore unreliable and potentially over ambitious.
- 4.2.2.On the back of this data the JLP proposes significant home building to accommodate significant migration into the area to fulfil the employment needs of significant growth in business/employment.
- 4.2.3.But the JLP does little or nothing to promote growth in Business other than bring in more potential employees by building more housing.
- 4.2.4.The government is pushing growth in the Midlands and Northern Powerhouse and they have much better business infrastructures. Suffolk cannot compete with this to attract new business unless councils introduce competitive incentives and improve the business infrastructure of the county. But this JLP proposes nothing constructive to achieve that.
- 4.2.5.This JLP is good for business as more housing will increase the unemployed pool making it easier and often cheaper to run a business, but that doesn't mean growth.

Sproughton Parish Council is happy to engage with Babergh District Council and to help ensure that the new Local Plan meets the needs of our local community, providing a framework for sustainable growth through to 2036. Sproughton Parish Council would like to see Babergh District Council engaging with, listening to and incorporating the views of our parishioners in the refreshed Joint Local Plan.

Yours sincerely

Mrs S Frankis

Mrs S Frankis

Clerk to the Parish of Sproughton



Russell Reeve (1895-1970)

Red House Farm

Sproughton@

V&A Museum