

Babergh & Mid-Suffolk Joint Local Plan
Consultation Questions & Answers in Red

Vision and Objectives

Q 1. What do you think the vision should be?

The vision of the plan must be to enhance the wellbeing of the inhabitants of Babergh and Mid-Suffolk Districts, now and in the future. The JLP covers 20 years and this timeframe needs to be recognized. This should follow a holistic approach to the challenges and opportunities the residents of the two districts face today and in the future. Any growth should build upon the aspirations and needs of its residents.

The Districts are largely open countryside and the economy has a rural base – agriculture, tourism and now more and more people are working from the home and any plan must recognise this. The plan must be the property of the people of the two districts.

Q 2. Do you agree with the identified objectives? Please explain reasoning.

No.

The plan is not written with 'local' ownership in mind. It is a desk based analysis from the top down.

The so called Growth Agenda overlooks the need for planned sequential development and the concomitant provision of services and infrastructure.

It follows that the objectives are in the wrong order. Broadly the prime aim must be to provide Healthy Communities. The Economy must be examined and enhanced. Growth in Housing and supportive Services and Infrastructure follows, parallel with the protection and enhancement of the Environment.

Q 3. Are there other objectives which should be added?

Services and infrastructure provision and timing must be described in greater detail recognising demographic needs – for elderly and young resident in particular.

Q 4. What should be a priority across the district area? (please state which district)

For Babergh District to engage with its residents and therefore the wider community in an on-going dialogue.

Q 5. What is most important for your town or village?

For Babergh DC to give full recognition to the policies and issues raised in the 'made' Lavenham Neighbourhood Development Plan.

Our prime aim is the provision of a new primary school. This needs to be pro-actively pursued by the authorities. In addition, the approach to housing development must be innovative and flexible, in order to meet the needs of young, disabled and elderly people.

Duty to Co-operate

Q 5A. Do you agree or disagree with the identified key issues for compliance with the Duty-to-Cooperate for the Babergh and Mid Suffolk Joint Local Plan? Please explain why.

DISAGREE see attached paper. The Duty to Co-operate legislative framework sits within Regulation 18, of the Town and Country Planning Regulations, however it does not adhere to the NPPF as a whole and the Plan Making section starting at Paragraph 150 thereto in particular.

Q 6. Are there any other key planning issues which need to be considered in accordance with the Duty-to-Cooperate? Please explain why.

Defined housing market area goes beyond JLP boundary. Demands of adjacent areas and Ipswich in particular, requires an urgent review of levels of urban density to start to address and contain the sprawl of the County Town into rural areas. See attached paper.

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Housing

Q 7. Do you agree with the proposed approach set out under Option HR1? If not, please explain why and what alternatives you propose.

No. HRI does not fully recognise the table above it on page 21. The number of *new* dwellings for Babergh District is thus reduced to 4,210 and then further reduced by Strategic Sites. Moreover, the number of proposed Social/Affordable housing units does not reconcile with the number of households registered with the authority seeking such accommodation.

Q 8. When allocating sites what scale of contingency should be applied? Please explain why. Until Q7 above is amplified, answered and digested: contingency numbers cannot be computed.

Q 9. Are there any specific measures that could be included within the Joint Local Plan that would assist with delivery?

Close liaison and engagement with the communities is necessary for them to understand why a particular site may be going forward. Presently, for many communities decisions are seen as being imposed from outside by the developer and the Local Planning Authority.

Q 10. What factors or priorities should be set as triggers for reserve sites to come forward?

The danger of setting triggers is that where planning permissions have been granted but are not coming forward for development, thus the trigger may be prematurely released. This could lead to further permissions being unnecessarily sought.

Settlement Hierarchy Review 2017

Q 11. Do you agree with the proposed criteria approach to rank settlements in the hierarchy? If not, please explain a suggested amendment or alternative. Yes.

Q 12. Do you agree with the proposed joint settlement hierarchy? If no, please provide further details as to how the hierarchy should be amended. Yes

Spatial Distribution

Q 13. Which option(s) for housing spatial distribution do you think is the best? Please explain your answer. BHD1

Q 14. Are there other realistic broad distribution options which should be considered? Please explain your answer. No. See above comments under Housing.

Q 15. If a new settlement was to be planned in the area, where should it be located? Please explain your answer. A short list should be prepared based on a set of criteria by the authorities.

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Housing Types & Affordable Housing

- Q 16. Should the Joint Local Plan include a requirement for new dwellings to meet the Nationally Described Space Standards?**
No. The authorities should enhance Space standards. They should consider the standards adopted in London by the Mayor's office and by those promulgated by the Royal Institute of British Architects.
- Q 17. Do you have any views on the proposed approach towards self-build and custom build dwellings?**
These should be actively promoted on both small and large sites, including any Strategic Sites and included on Exception Sites criterion.
- Q 18. What should the Councils' approach to Starter Homes be?**
Such dwellings need to be designed and constructed so as to have a build in flexible whole life standard and thus be truly sustainable.
- Q 19. Should the Councils be prioritising the provision of any particular types of homes?**
2 & 3 beds properties suitable for flexible whole life uses – young, disabled and elderly people. One bed properties should be avoided as they are not flexible.
- Q 20. Are there any other types of housing that should be planned for / required?**
One and a half bedroom properties for the long term single, and individuals and couples starting out in adult life and toward the end of their lives. This type of accommodation provides total flexibility.
- Q 21. How can the Councils promote / facilitate development of homes for private rent?**
By forming a Local Housing Company and investing in this area and not Commercial Property. LHC is a proven methodology used throughout the country.
- Q 22. In relation to affordable housing, do you consider the requirement should be set at a percentage other than the current 35%? If so, please provide reasons.**
35% should be maintained. It should meet demand, including existing and plan for the 'registered list' to be eradicated. 35% may be considered a starting point for developers to negotiate down, but as the relevant reports are in the public domain, developers will be aware of the statistical analysis. Any viability test needs to be in the public domain, by using the open book model.
- Q 23. To what extent should affordable housing be (or not be) prioritised over provision of other infrastructure where viability is an issue?**
The affordable housing registered list of households needs to be met. An LHC could meet this and open market rented provision.
- Q 24. In relation to affordable housing, should there be any preference for housing to accommodate key workers?**
A definition of Key Workers would be helpful. In any event, this may be more appropriate to urban areas. No statistical evidence is apparent within the JLP, so a more definitive answer cannot be given.
- Q 25. If Option RE2 is supported, what maximum percentage of market housing should be acceptable?**
RE2 is supported. A 35% open market element would appear relevant, and any viability argument to resist this must be based on any viability test using an open book method.

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Rural growth and development

- Q 26. Which option for the policy approach to rural growth do you think is most appropriate? **RG1**
- Q 27. Are there any other approaches to distributing development in rural areas that we should consider?
Consideration needs to be given to particular circumstances and the ability of a rural community to absorb an increase in the number of dwellings arising from a development. Any development needs to be defined by size, density and the benefit to the local economy and environment.
- Q 28. Do you support the approach proposed for hamlets? If not please explain.
HG2 supported.
Draft criteria too restrictive. Inclusion of Exception Sites to be available where local need is proven. Exception Sites definition to include up to 35% open market provision.

Accommodation Needs of Gypsies and Travellers

- Q 29. What should the Councils' approach to provision of negotiated stopping places be?
The Councils should engage with the Gypsy and Traveller communities to seek their views as to any generic site characteristics, and having digested that then seek to start a dialogue with the towns/parishes concerned.
- Q 30. Please submit details of any sites, or extensions to existing sites, which you consider are suitable for allocation as Gypsy and Traveller sites or Travelling Showpeople sites.
Have you asked the people concerned?
- Q 31. Should the Joint Local Plan include a policy which identifies areas where moorings would be acceptable in principal? **No knowledge.**
- Q 32. If so, are there any specific locations where additional moorings could be located? **No experience.**

Economic Needs

The lack of an economic appraisal and employment trends data means the answers to this section cannot be properly considered.

- Q 33. Should we continue to identify existing employment areas and protect land and premises in these areas from redevelopment/conversion to other uses unless marketing evidence demonstrates there is no demand for employment use?
Yes. However, no criteria are given and bearing in mind our preamble note to this section the first part of the question cannot be fully explored. The second part as it relates to change of use may need to use specific marketing evidence relative to the property concerned, but also generic evidence as it relates to say an area or type of activity.
- Q 34. If we continue to protect existing employment areas, which areas should be identified?
See the answer to Q33 and LNDP.
- Q 35. Are there any existing employment areas that could be reallocated to other uses?
The Delphi site in Sudbury will be vacated during 2019. It is a large site adjacent to existing residential housing development land. It is doubtful that a large single use employer will want such a site. Employment land in other areas of greater Sudbury do not appear to be fully utilised.

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- Q 36. Should we identify areas where non-B class uses, such as car showrooms, tyre and exhaust centres and building material stores, can be located?
No. Economic factors and location will determine such uses.
- Q 37. Should there be a policy that allows a wider range of uses than just B class on all employment sites or selected employment sites? **Yes.**
- Q 38. Should we allocate more than enough land to meet the forecast needs to enable more choice in the market and give flexibility to changing circumstances?
Yes, some but not in perpetuity, the economic scene is changing rapidly and any policy must reflect this. The growth in Artificial Intelligence and Robotics are cases in point.
- Q 39. Should we make specific employment provisions for small and medium sized enterprises? If so, how and where?
Yes. The growth in self-employment and in particular 'home' based activities must be recognised and fostered; this is currently not recognised in the JLP. Small secure premises for artisans and delivery persons need to be provided. In a rural environment the obvious place to situate these is on farms. With the demise of livestock farming and the concentration of arable farming, buildings become redundant and could be rejuvenated for this proposition.
- Q 40. If we expand, or allocate additional employment land where should these be?
See answer to Q39 and in the more urban areas of Sudbury and Hadleigh.
- Q 41. What approach should we take to supporting new business formation across the Districts?
To nurture business requires a wide skill base, augmented by a stable and consistent environment and decision making process. This should be seen by the two authorities as facilitating a process and providing a service and this requires prompt and consistent advice. Training and development of Officers may be needed to widen their mind set. The LEP should be in a position to advise further.

Town Centres and Retail

- Q 42. Do you consider that any of the sites put forward as part of the Call for Sites should be allocated for retail or commercial leisure use? Please state why. **No.**
- Q 43. Are there any other sites that should be considered for retail or commercial leisure use? **No.**
- Q 44. If you consider allocations for retail development should come forward as mixed use, please provide details.
This will depend on local need, which may include need arising from any development.
- Q 45. Do you agree with the proposed Town Centre boundaries, Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontages? If not, please explain why. **Yes.**
Our preference is to follow Option OC1, TC1, PS1 and RIA 2.
- Q 46. Do you agree with the approach to not define Primary Shopping Area boundaries within settlements other than the three main towns? If not, please explain why.
Yes. See preferences above
- Q 47. Do you agree with the approach to maintain and increase retail provision within the District Centres? If not, please explain why.
Yes, where it can be proven. See preferences above.
- Q 48. Do you agree with the proposed thresholds relating to the mix of uses within Primary Shopping Frontage? If not, please explain why.
Yes. See preferences above.
- Q 49. Do you agree with the proposal to require an impact assessment for all edge of centre and out of centre retail proposals that are 400sqm gross floorspace or more? If not, please explain why.
Yes. See preferences above.
- Q 50. The Councils propose to protect A1-A5 uses in Core Villages and Hinterland Villages, and in local centres within towns. Do you consider this to be the correct approach?

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See the LNDP.

Biodiversity

Q 51. Do you have views on the Option BIO 1 and / or BIO 2? **Agree to BIO 2**

Climate Change

Q 52. How should the local plan consider the impact of renewable technologies? What types of effects should be assessed within the policy criteria?

Option RE2. Effects should in the first instance be measured against the reduction in the consumption of energy.

Other considerations included in a specific note on the subject attached.

Q 53. Do you support the Council's initial preference to include water efficiency measures in new build? If no, please explain why? **Yes. FR1 option.**

Q 54. Are there any other additional environmental standards Babergh and Mid Suffolk should be requiring? If so, please provide details and reasons why. **See note referred to at Q52 above.**

Landscape, Heritage & Design

Q 55. Are there any other approaches that the Joint Local Plan could take to protect the landscape?

Landscape Guidance needs greater status, awareness and consideration and must take into account the major land use which is agricultural together with the associated land quality. The Guidance needs to be drilled down further to be of meaningful use. When this is completed Landscape can be appraised and uses determined. We would respectfully suggest the LNDP as an example to give the vital importance necessary to proper consideration of land use and protection of the landscape which is our valuable heritage.

Q 56. Should additional protection be given to areas which form part of a landscape project area but which aren't designated? **Yes. Option L2**

Q 57. How can the Joint Local Plan make the most of the heritage assets?

There is a high concentration of heritage assets in the two districts and they need protection with meaningful policies and subsequent enforcement. This will require the co-operation of other agencies, mainly those already consulted under the Duty to Co-operate procedure.

In Lavenham we have an early, in situ gas holder circa 1832. Its condition is deplorable and it has trees growing out of it. The parish council is willing to take on the responsibility for the site.

Q 58. What level of protection should be given to identified non-designated assets? Are there any specific situations in which the balance should favour or not favour protection of identified non-designated assets?

Such items commonly referred to as a local lists, should have the same protection as a grade II *. In Lavenham a local list is in preparation, we also have a medieval water culvert under Water Street that is in danger of collapse, albeit that it is still used by Anglian Water.

Q 59. Should a more flexible approach toward climate change objectives be adopted where this would assist in protecting a heritage asset? **No.**

Q 60. Is there any aspect of design that priority should be given to?

Safeguarding the local environs around any proposed development envelope. Avoiding a pastiche of the past by embracing the present. The palette of materials and colours used on development of more than 10 units needs to be specified and agreed to, with a contractual financial penalty otherwise arising.

Q 61. Is there any aspect of design that should be introduced to the Councils' policies? **Recognition that infrastructure is in place to support any development. An agreed sequential plan between the LPA and each parish as development arises.**

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- Q 62. Is there an area of design related to past development that you consider needs to be addressed in future development?
Outline planning permissions to be avoided and detailed permissions for sites of over 10 units to be put in place, subject to some reserved conditions. This should avoid any subsequent renegotiation with the LPA and misconceptions with the communities concerned.

Infrastructure

- Q 63. Which option do you consider most appropriate? Please explain why? **INF 2, plus.**
- Q 64. What do you consider the key infrastructure issues in your community? **Key Infrastructure provision includes; facilities for elderly residents, a new Primary school, and additional vehicle parking. Utility service providers and Suffolk CC must engage with these and also maintain what they have now.**
- Q 65. What infrastructure issues do you consider to be a priority for the future? **Elderly care provision to include supported housing to provide sheltered and care in the community facilities. New Primary School and car parking provision.**
- Q 66. What infrastructure do you think would be needed to support the growth scenarios? **As at Q64, above.**
- Q 67. What comments do you have on the proposed strategic approach to infrastructure delivery?
An infrastructure delivery plan addressing not only need but delivery and enforcement is necessary. Providers and utility providers, to include the District and County Councils need to be held to account. A 'can do' mentality needs to be instilled in these institutions and financial penalties imposed.. The Managing Infrastructure Provision draft policy is too weak. As this is central to sequential development, the policy needs to be strengthened by, in the first instance the omission of words such as 'likely' and 'may'.
- Q 68. Should a separate policy be developed to manage provision of education and healthcare?
Yes. Education as drafted may need a more pro-active approach especially in rural locations as many local primary schools have little inherent flexibility to expand and the LEA, is apparently cash poor. HealthCare needs a broader approach than just the provision of surgeries, although these are important. Provision for early intervention in care in the community and at home, especially to meet the demands of an aging population is paramount.

Healthy Communities

- Q 69. Should the strategy of the Plan be focussed on addressing deprivation? **Yes, but not confined to deprivation, early intervention may stop any regression into this.**
- Q 70. Are there any specific approaches that should be applied to address deprivation? **Early intervention and support.**
- Q 71. Are there any other circumstances and / or provisions under which open space, sports facilities or community facilities should be required and / or protected? **OS2, NROS2 and POS2 apply.**
- Q 72. Through the Plan should any other areas of Local Green Space be identified and protected?
Yes and to include important views into and out of neighbourhoods. Each town and parish should put its proposals forward to the district council for agreement/adoption.
- Q 73. Are there any specific facilities that should be included in the definition of community facilities? **See Q64 onwards above.**

Functional Clusters

- Q 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? **Yes.**

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Settlement Boundaries

- Q 75. Do you consider the proposed new settlement boundaries to be appropriate? (please explain your answer) **Yes.**
- Q 76. Are there any other settlements that should be given new settlement boundaries? (please explain your answer) **Perhaps.**
- Q 77. Is the threshold (10 well related dwellings) for identifying settlement boundaries appropriate? **Yes.**

Potential Land for Development

- Q 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 ie. SS0001).
- SS0583 - this site is unsuitable as it is divorced from any substantive residential development and is an example of ribbon development.**
- SS0214 – approved by LPC, outline planning permission granted for 25 dwellings and is in line with LNDP. Pre-planning meetings held with LPC and public exhibitions undertaken by developer.**
- SS0217 – approved by LPC for 25 dwellings, outline planning permission currently being sought from LPA and is in line with LNDP. Pre-planning meetings held with LPC and public exhibitions undertaken by developer.**
- SS0582 – approved by LPC for 25 dwellings, outline planning permission currently being sought from LPA and is in line with LNDP. Pre-planning meetings held with LPC and public exhibitions undertaken by developer.**
- SS0288 - Development appears excessive and outside the guidelines within the LNDP. Pre-planning meetings with LPC should be undertaken by the developer. An alternative use for part of the site may be for the provision of a replacement primary school.**
- Q 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)? **Not at this time. Exception sites may need to be considered to meet proven local housing need.**

Community Choice & Neighbourhood Plans

No questions.

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