

Babergh Local Plan / Local Development Framework

Annual Monitoring Report 2005/06



December 2006

Contents

1. Contextual Indicators	Page 2
Babergh District: Outline of Main Characteristics and Key Issues	Page 2 - 5
Core Output Indicators Summary Table	Page 6 – 8
Commentary	Page 8 - 10
Future Monitoring Plans	Page 11
2. Implementation of Local Development Scheme	Page 12 - 16
3(i). Policy Non-Implementation	Page 17-18
3(ii). Policy Performance	Page 18 – 22
3(iii) Commentary on Appeal Decisions	Page 23
4. Housing Delivery	Page 24
(i) Housing Trajectory	Page 24
(ii) Affordable Housing	Page 28
(iii) Gypsies and Travellers	Page 30
5. Local Development Orders (N / A)	Page 34
Appendices	
Appendix 1: LDS Implementation – Detailed Schedule	Page 36 - 40
Appendix 2: Housing Trajectory Detailed Table	Page 41- 44
Illustrative Material	
Figure 1 Map of Babergh District	Page 3
Figure 2 Housing Trajectory: Suffolk Structure Plan (1996 – 2016)	Page 32
Figure 3 Housing Trajectory: East of England Plan (2001 – 2021)	Page 33

Babergh District Council

**Babergh Local Plan / Local Development
Framework**

Annual Monitoring Report 2005-06

NB: The period covered by this AMR is 01 April 2005 - 31 March 2006

Introduction

The requirement upon all local planning authorities to prepare and submit an Annual Monitoring Report each year arose under the Planning and Compulsory Purchase Act in September 2004. This Annual Monitoring Report (AMR) is the second to be produced by Babergh Council under Regulation 48 of the Town and Country Planning (Local Development) (England) Regulations 2004.

Contextual Indicators

This section provides a contextual background to the rest of the monitoring report. It is a summary of the geography and demographics of the Babergh district, and of the key issues affecting the District. The key environmental, social and economic characteristics of Babergh are included.

Geography and Demographics

Babergh District had a population of 85,100* in mid 2005, according to the Office for National Statistics official mid year estimate. This appears to represent a very small increase on the equivalent figure for the previous year (84,800) although the effect of rounding these figures could alter the extent of the actual increase either upwards or downwards. Babergh district has a geographical area of 596 square kilometres. The district is predominantly rural, but there are two main market towns: Sudbury and Hadleigh. The largest town is Sudbury with a population of 12,040 (2003 Suffolk County Council estimates) adjacent is Great Cornard (normally counted with Sudbury) having a population of 8,020 (2003 Suffolk County Council estimate). Sudbury and Great Cornard are the largest urban areas in the district and they are identified as the locations for the

largest scale housing growth. The second largest town is Hadleigh, with a population of 7,840 (2003 Suffolk County Council estimate). Parts of the continuous urban areas of Ipswich, particularly Pinewood, extend into the district on its eastern fringe (this urban parish had a population of 4,013 as of the 2001 Census).

The district also contains a wealth of attractive villages, historic buildings and countryside. Much of the countryside is of high landscape value, with two Areas of Outstanding Natural Beauty and a number of Special Landscape Areas. There are also 28 conservation areas and approximately 4,000 listed buildings within the district.

The character of the District changes from deep countryside in the west to river estuaries of the Orwell and the Stour in the east and south respectively. Parts of the area are also serviced by good rail links to London via Sudbury, Ipswich and Manningtree.

* ONS figure for total resident population, rounded to the nearest 100

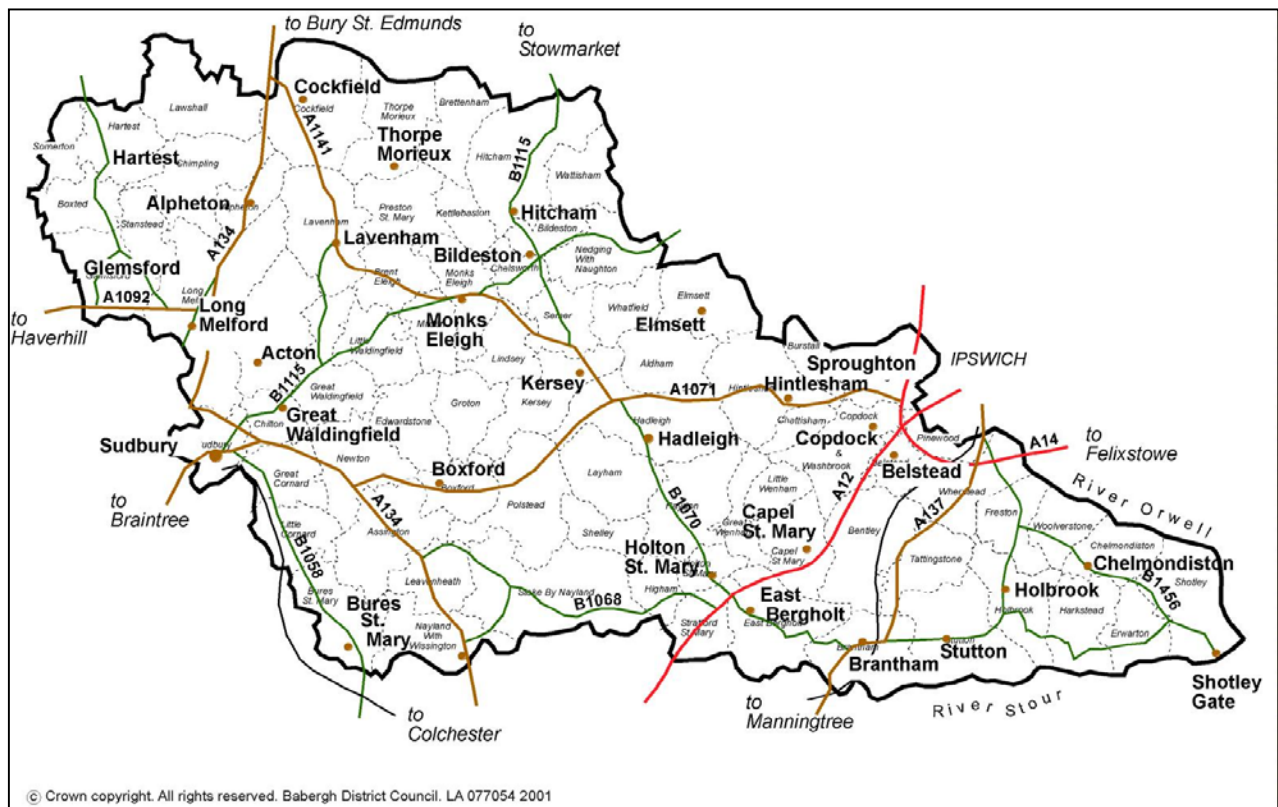


Figure 1: Map of Babergh District

Issues

- The district has a low crime rate and represents an attractive ‘rural idyll’ for residents and visitors
- This has attracted outward migration from London and the south-east
- House prices are high and the problem of affordability has increased in the district
- There is also pressure on the countryside for change of use of land to housing, equine-related uses and extensions to gardens
- Agriculture continues to be under financial pressure and has subsequently diversified in many cases; leading to a variety of uses for redundant farm and other rural buildings and new uses for farmland where farmers are trying to increase their income
- Pressures arising through the planning system to develop brownfield sites for housing and the desire of commercial organisations to maximise capital receipts has meant that employment land has come under pressure for re-development as housing
- There is a serious shortage of employment land in the district

- Any well-designed and built new commercial developments in good locations let or sell very quickly
- The district is also attractive for tourists and maximising the economic benefit to the district while trying to minimise the adverse impact is necessary
- Certain parts of the district are particularly dependent on one employer, which causes concern

Issues by Topic

Housing

- Ensuring that annual completions reflect the allocated numbers arising through Structure Plan / Regional Spatial Strategy requirements
- Achieving the right type and mix of housing for 'open market' housing requirements
- Achieving the required proportion, type and size of affordable housing where it is needed

Economy

- Safeguarding existing and delivering new employment land in the right locations
- Ensuring businesses are in up-to-date premises and ensuring that vacant and unoccupied land and premises are reoccupied efficiently
- The core retail frontages in town centres are under pressure from non-retail uses
- In Hadleigh there is an identified quantitative and qualitative need for a new supermarket and accommodating this scale of modern development in an historic town without harming its character is a complex development issue

Countryside

- The attractive countryside is under pressure for change (see points above). This creates major issues for local communities and the planning authority

Sustainable Communities

- Reducing dependence on the use of the private car
- Retaining facilities in villages is also difficult as keeping them well-used and economically viable is a major problem and changes of use from a village facility to residential use are often commercially more attractive
- Rural housing affordability and availability
- Availability of transport facilities and access to services in rural areas

Development Issues

- Development pressures in Babergh remain very strong and the effective control of these presents substantial challenges
- Accommodating appropriate development of most forms in the district proves difficult to achieve in practice, due to factors such as negative perceptions of development in general and the resultant opposition to it
- The pattern of development in Babergh presents difficulties, as most residential developments are very small in scale. This can often make them easier to assimilate into localities and local communities but makes the securing of benefits such as affordable housing provision much harder
- The Chilton Mixed Use proposal presents planning, implementation / delivery issues for the district, in terms of housing (including affordable housing), access, design, infrastructure, landscape impact and the scale of development, etc.
- There are still some previously developed and under-utilised areas of land that are suitable for development within the district, and ensuring that these are developed appropriately is a concern

- There are major areas either allocated for housing or with planning consent for housing that need to be developed within the Local Plan period
- Market conditions for housing development are currently strong but also very changeable and this can create problems for new development and its delivery
- With the large number of listed buildings and Conservation Areas, safeguarding and enhancing the historic environment is a substantial concern for the district
- Ensuring that development uses sustainable means of construction

Opportunities

- The larger housing schemes, particularly those in and around the Sudbury area and Hadleigh, offer the scope to create more sustainable communities and can potentially deliver significant volumes of affordable housing
- The Chilton Mixed Use Development proposals provide a major opportunity to provide an attractive new sustainable community with significant new employment areas
- Tourism can increase its contribution to the local economy if it is carefully managed, as there are many attractions in the district
- Sudbury town centre is a thriving and vibrant centre and serves a significant catchment area

Summary of the Core Output Indicators by Key Policy Themes 2005/6

Theme	No.	Data Required	Data Supplied
Business Development	1a	Amount of floorspace developed for employment by type.	B1 (a) – 2200 B1 (b) - 296 B1 (c) – 420 B2 - 1088 B8 – 2143 Many of these consents are flexible allowing a mixture of uses in each building.
	1b	Amount of floorspace developed for employment by type, in development or regeneration areas.	B1 (a) -1001 B1 (b) -195 B1 (c) – 195 B2 – 584 B8 – 357 Many of these consents are flexible allowing a mixture of uses in each building.
	1c	Amount of floorspace by employment type, which is on previously developed land.	B1 (a) - 369 B1 (b) - 0 B1 (c) -0 B2 – 0 B8 -0
	1d	Employment land available by type.	B1 (a) – 23.9 Ha B1 (b) – 5.6Ha B1 (c) – 5.6 Ha B2 – 32.2 Ha B8 – 2.44
	1e	Losses of employment land in: i. employment areas and; ii. in local authority area.	(i) = 0 (ii) = 1.13 Ha
	1f	Amount of employment land lost to residential development.	1.13 Hectares
Housing	2a(i)	Net additional dwellings over the previous five-year period or since start of relevant DPD period, whichever is the longer.	1380
	(ii)	Net additional dwellings for the current year.	189
	(iii)	Projected net additional dwellings up to the end of the relevant DPD period, or over 10-year period from its adoption, whichever is the longer.	4523 supply as at 2006 but this makes no allowance for non completions over the plan period.
	(iv)	Annual net additional dwelling requirement	345 Structure Plan 280 Draft East Of England Plan

	(v)	Annual average number of net additional dwellings needed to meet overall housing requirements, having regard to last year's performance.	422 pa over the Structure Plan Period to 2016 or 281 pa over the East of England Plan period to 2021
	2b	Percentage of new and converted dwellings on previously developed land.	Financial Year ending: 2001 – 55% 2002 – 57% 2003 – 39% 2004 – 55% 2005 – 43% 2006 – 68%
	2c(i)	Percentage of new dwellings completed at: less than 30 dwellings per hectare	11%
	(ii)	Between 30 and 50 dwellings per hectare; and	49%
	(iii)	Above 50 dwellings per hectare.	40%
	2d	Affordable housing completions.	52
Transport	3a	Amount of completed non-residential development within UCOs A, B and D complying with car-parking standards set out in the LDF.	All non-residential developments comply with the parking standards set out in the development plan and these are applied across the whole of Suffolk.
	3b	Amount of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre.	This information is not currently monitored.
Local Services	4a	Amount of completed retail, office and leisure development; and	Retail – 486m2 Office – 1199m2 Leisure – 591 m2
	4b	Amount of completed retail, office and leisure development in town centres.	Retail – 166m2 Office – No completions Leisure – No completions
	4c	Amount of eligible open spaces managed to green flag award standard.	None.
Minerals and Waste	5a, 5b, 6a & 6b	For minerals and waste planning authorities only.	N/A
Flood Protection and Water Quality	7	Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.	One application was approved contrary to advice from the Environment Agency. It is hoped to resolve the issues at the

			reserved matters stage.
Biodiversity	8(i)	Change in areas and populations of biodiversity importance, including change in priority habitats and species (by type); and	No info yet, the County Biological Records Centre are updating baseline information and it is hoped to have better data in future but it will not be updated annually. 13 Planning permissions were granted last year with a condition relating to priority habitats and species. 2 Planning Applications were refused in part due to the species affected.
	(ii)	Change in areas designated for their intrinsic environmental value including sites of international, national, regional, subregional or local significance.	No changes in the areas designated for their intrinsic environmental value.
Renewable Energy	9	Renewable energy capacity installed, by type.	Solar: 20kw (max at full sun). Aerothermal: 5kw.

Commentary on Core Output Indicators

Business Development (Indicators 1a,b,c,d,e,f)

For commercial completions, very few of our planning consents are restricted to a single use, this is to allow businesses to grow and evolve without having to apply for a new consent, and most of the employment areas are suitable for a variety of uses. The figures shown are based on estimates of how these uses may be split.

With the Inspector's Report and now the adoption of the revised Local Plan there are substantial areas of employment land available for new development. Several local and international companies have expressed an interest in developing new premises on or relocating to these new sites in Hadleigh on the Ipswich fringe and in Sudbury. The new land will help these industries expand and benefit the local economy.

The amount of business floorspace completed seems low particularly in relation to the number of schemes and floorspace permitted each year although it is similar to neighbouring districts. The amount of floorspace completed for different use classes does vary from year to year and with the new allocations the floorspace constructed would be expected to increase over the next few years. At present there is a shortage of good commercial floorspace, which sells very quickly when it is available; sometimes so quickly it does not appear on the open market. Local estate agents say that they have people regularly asking for details of new premises if they are available.

Only a limited amount of the floorspace has been built on previously developed land, which reflects the necessity in the district to allocate greenfield sites for employment use to meet the need. There is insufficient brownfield land available to meet the demand for employment land.

A small area of employment land was lost to residential development over the year. This was land outside an allocated employment site and partly reflects the Council's success in safeguarding the allocated sites with policies in the Local Plan.

Housing (Indicator 2 a,b,c,d)

For residential development, the supply of land has increased substantially over the last year with the new allocations proposed by the Inspector after the Local Plan Inquiry and new windfall planning consents granted over the last 2 years. There appears, at present to be sufficient allocations, sites identified for residential development and consents to meet both the current Structure Plan and Draft East of England Plan requirements. However the completion rates still remain below those needed to meet either plan's requirements (set out in indicators 2a(iv) and 2a (v) above). More detailed commentary can be seen with the housing trajectory, but over recent years completions have largely been on windfall sites, which have usually been brownfield and this year's figure is above national, regional and Structure Plan targets at 68%. With the new greenfield allocations it is unlikely that this level of brownfield completions will continue although many windfall sites will be brown field. Following discussions with developers it also seems likely (subject to market conditions) that the rate of development of new housing will increase substantially over the next few years. If this happens then some of the shortfall of completions should be made up and completions should be at or above the rate required by the East of England Plan but probably below the rate required by the Suffolk Structure Plan 2001.

Indicator 2c. Housing density has been included for sites of 10 dwellings or more and shows that the majority of sites are completed at over 30 dwellings to the hectare with 40% over 50 to the hectare. This indicates a welcome shift towards a more efficient use of land and providing a higher number of dwellings on any given site, it also increases the variety of housing available on the market to help cater for local need. Many new and reserved matters applications are now at very high densities where it is difficult to maintain appropriate high quality design solutions. This also means that most of the allocated sites are likely to deliver more dwellings than the estimate in the Local Plan. Although, because we cannot be certain which sites will be developed at present and only few have detail planning consent, the final numbers each site will deliver is an estimate and shown in the appendices to this report.

Indicator 2d. The Council has ambitious targets for completion of affordable housing and has achieved a high proportion of the overall completions recently, there are also several sites which are included in the housing trajectory. It is difficult to predict when some affordable housing will be delivered, particularly when they are part of a mixed general market-housing site.

Local Services (Indicator 4a,b,c)

There also appears to be a relatively small amount of floorspace completed in Local centres in the year. This reflects the mixed-use nature of the allocated employment sites, (where B1 use is possible) and the rural nature of the district where redundant farm buildings can be converted to employment uses including B1 offices. There are also villages with substantial numbers of shops particularly those villages popular with tourists. Leisure uses can also be completed within or adjacent to villages.

Indicator 4c amount of eligible open space managed to green flag standard is not considered a good indicator because it is too simple and also involves the payment of an annual fee to have the land registered as meeting this standard. The indicator only reflects one type of open space and open space can perform many functions.

Renewable Energy (Indicator 9)

Due to the quality of the district's landscape and airspace restrictions it is unlikely that large wind farms would be acceptable in the district. Any renewable energy schemes will be on a local scale rather than large scale and of regional importance. There is also concern that small domestic wind turbine and solar panel proposals will have an adverse impact on the many listed buildings and conservation areas in the district. This type of development will require careful consideration to ensure it is appropriately designed and located. It is difficult to monitor this indicator unless there are more schemes where renewable energy is part of the original planning application or building regulations applications.

Review and Plans regarding Progress in Future Monitoring

Effective and comprehensive monitoring systems were not traditionally established in Babergh Council in the past. However, it is recognised that the new planning system, to operate effectively under the plan, monitor, manage principles, will rely increasingly upon the development and maintenance of effective monitoring systems. Therefore, this situation has been changing. Firstly, the Council in procured a more effective electronic planning application records system with a dedicated monitoring module. This allows the creation of reports purpose- designed for particular monitoring tasks. An information backfilling exercise to catch up with previous years monitoring information was carried out in late 2003 and this proved highly valuable in providing information to inform the Babergh Local Plan Inquiry in 2004 – 5. A set of historical time series records was thus obtained.

Monitoring information returns for the regional spatial strategy AMR have been much more complete since 2004 / 2005 and in 2006 more complete than ever before. Since 2005 staff have been specifically assigned to ongoing monitoring work covering both planning permissions and completions across both residential and employment / commercial developments. Four key work areas have been identified and prioritised to form a co-ordinated action plan, as follows:

1. Work to harmonise information gathering and exchange across numerous existing departments and systems in the Council will be carried out in early 2006;
2. Work to harness the capabilities of the Council's electronic planning application records system better will be undertaken (by the Policy team) at the same time;
3. Work to systematise the various different information-collection exercises carried out annually (or more frequently) is already well underway. This includes the National Land Use Database; annual AMR for the RSS; Best Value returns on development on PDL; the annual 'Suffolk's Environment' AMR and now of course, this AMR for the Local Plan / LDF; and
4. Finally, a review of all aspects of monitoring that are currently lacking or insufficient, including those Core Output Indicators required for this AMR. Measures will be put in place to gather the information now that is currently lacking so that it can be fed into next year's AMR.

These areas of work will enable the Planning Policy team and others within the Council to deliver more comprehensive AMRs for the Local Plan and LDF in future years. Although relatively limited detailed work was carried out during 2006 to deliver the above specific improvements, as at the end of 2006, a detailed action plan is being developed to address these matters. The action plan will be drawn up by the end of 2006, complete with a time programmed, detailed implementation plan. The action plan itself (work in progress) is too detailed to include with this AMR but the above summary of work areas describes in broad terms the steps necessary to improve the Council's performance in monitoring.

2. Implementation of the Local Development Scheme

NOTE: This text provides an explanatory overview, while **Appendix 1** provides a quick reference guide to progress on implementation (reg 48 (3) refers).

Background

NB The detailed timetable for preparation of each document is set out in the table attached at Appendix 1

The Council adopted the first Local Development Scheme (LDS) for Babergh in February 2005, without a need for the Government Office to direct the Council to change it fundamentally. This covered the first almost five-year period from early 2005 to late 2009. However, in the light of various comments from the Government Office (GO East), the scheme was amended and re-issued in August 2005, to incorporate some revisions that GO East considered necessary. The first document listed in the LDS is the Babergh Local Plan (Alteration No. 2). During the periods covered by the LDS and this AMR, the clear priority was to pursue the adoption of the Babergh Local Plan Alteration No. 2 (which was actually much more akin to a complete Plan review than a Plan alteration). The detailed elements of this process and progress against their timetable were as follows:

Stage	Timetable	Progress
Production of Inspector's report	April – end November 2005	Timetable Met
Publishing of Inspector's report	December 2005 / January 2006	Timetable Met
Drafting of Post Inquiry Modifications	January 2006	Timetable Met
Deposit of Post Inquiry Modifications (consultation period)	February – March 2006	Timetable Met
<i>Consideration of responses to PI Modifications / Possible need for any further modifications – allied to the above</i>	<i>April – May 2006</i>	<i>Timetable Met</i>
<i>Adoption of Plan</i>	<i>June / July 2006</i>	<i>Timetable Met – adoption 1st June 2006</i>

Subsequent stages of Plan process beyond the 2005-6 monitoring period marked in italics

Babergh Local Plan Alteration No. 2

The priority to adopt this Local Plan was observed. The timetable for its adoption was extremely demanding due to the effective deadline of 21 July 2006, when the EU Strategic Environmental Assessment Directive was to come into force. The Plan will be a saved document and was taken through a Public Inquiry, completed at the start of this monitoring period. In November 2005 the Inspector's report was received and responded to very promptly, with proposed Post Inquiry Modifications agreed by Babergh's Strategy Committee and full Council by mid December, ready for public consultation commenced in January (and concluded in March) 2006. However, the final deadline for adoption was met and each stage within the programme leading towards it was also met against the timetable. This took place soon after this monitoring period on 1st June 2006.

Statement of Community Involvement

Babergh's Statement of Community Involvement (SCI) was scheduled to be the first Local Development Document (LDD) that the Council would produce for its new LDF. The

Council considers that in producing a LDF the SCI should be the first LDD to prepare as it sets out the consultation and production framework for all subsequent documents. Scoping work was carried out on during the first months of the monitoring report period. This included a thorough review of best practice in production of SCIs by other local authorities around the country, some of which had already progressed to a relatively advanced stage.

In July-August 2005, the Council went through the initial regulation 25 consultation on the SCI. It subsequently produced a pre-submission draft SCI document and completed the 6-week public consultation period necessary under regulation 26 from October-December. It proved very difficult to meet all of the initial consultation period dates, these dates having originally been set consecutively, with no period to carry out work in-between them. Consequently some programme slippage occurred. However, later in 2005 good progress was made. Preparation of the revised submission document and submission for examination were due in December 2005 but not achieved. The ensuing public consultation period (due February 2006) also could not be achieved as a result. The details of the programme and progress against it are set out below:

Stage	Timetable	Progress
Scoping (pre-production)	April – July 2005	Timetable met
Pre production early consultation (reg 25)	July 2005	July – August 2005 Timetable met
Public participation on draft SCI (reg 26) / Representations on proposals (reg 27)	August 2005 / September – October 2005	October – December 2005 Timetable not met
Preparation / Submission of draft SCI	November - December 2005	<i>May 2006</i> <i>Timetable not met</i>
Post submission consultation (reg 29)	February 2006	<i>May – July 2006</i> <i>Timetable not met</i>
<i>Pre exam meeting (if required)</i>	<i>April 2006</i>	<i>Not applicable (no Hearing or Inquiry)</i>
<i>Examination</i>	<i>June 2006</i>	<i>August - October 2006</i>
<i>Receipt of Inspector's report</i>	<i>July 2006</i>	<i>October 2006</i>
<i>Adoption</i>	<i>August 2006</i>	<i>December 2006</i>

Subsequent stages of SCI process beyond the 2005-6 monitoring period marked in italics

The original LDS timetable for production and adoption of the SCI cannot (retrospectively) be considered as realistic or achievable. For example, its commencement was scheduled during the crucial run-up to the adoption of the Local Plan, already a more than sufficient task for a very small Planning Policy team. Subsequent stages were scheduled to occur immediately after each other with no time allowed for document development and revision in-between. Timetable slippage occurred, unsurprisingly, from August 2005, when the run-in to Local Plan adoption was just getting underway and accordingly this impacted on the rest of the programme from there on, since there are limited opportunities to make up for delays subsequently with prescribed periods for consultation periods, for example (set at 6 weeks).

Some programme slippage also occurred in mid 2006, with the need to deal with some objections from GO East on the submission version document. These were subject to negotiation between the Council and GO East (which requires a reasonable amount of time to conduct) with some ensuing changes as a result. Although this held up the process at that stage, it resolved any objections of a relatively substantive nature and saved time subsequently at the examination stage. This also helped ensure that the SCI

passed the tests of soundness at examination. Considering that the Local Plan was adopted in June 2006, the progress made on producing the Council's SCI, albeit behind schedule, with adoption in December 2006, is considered to be very good progress

Some similar problems apply to other areas of the LDS, as the original programme was prepared in a very short time during the Local Plan Inquiry, in early 2005. These difficulties in delivering the LDS programme have led to subsequent needs to revisit and revise the LDS. The recommendations on this are set out in a section below all text on documents listed in the LDS.

Sustainability Appraisal / Strategic Environmental Assessment

NB This work and its report outputs do not need to be included in the LDS but were included in the original document, in the interests of completeness and fullness of information

A considerable amount of work was undertaken in 2004 and 2005 working jointly with other Suffolk local planning authorities on the baseline data and initial scoping report for the Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) of the Local Development Framework (LDF). This initial work placed Babergh in a strong position from which to progress individual scoping and subsequent reports for the various LDF documents to be produced. With most baseline data now gathered by 2004, a draft scoping report was produced by July of that year. It was not necessary to progress further a final scoping report at that stage, since no new LDF documents were programmed for commencement of preparation until later in 2006. *However, work to update and revise the draft scoping report was carried out in late 2006 and a final draft scoping report was produced, with consultation carried out at the end of the calendar year (beyond the period of this AMR).*

SPDs: Chilton Development Brief; Affordable Housing; and Employment Land Retention

See text at Appendix 1 and Revisions to LDS section below, which provide all necessary information.

Core Strategy Policies & Proposals Map and Site Specific Allocations, Policies & Proposals Map

Work on these documents was scheduled to commence in June 2006 and April / May 2007 respectively, beyond the monitoring period for this AMR. These in turn would be influenced by:

- progress on adoption of the Local Plan (deadline July 2006). *As stated previously, this was achieved. However, a very significant volume of work was necessary afterwards to produce a final published document. This inevitably had a knock-on impact on preparation for the new LDF*
- adoption of the Regional Spatial Strategy (originally due late 2006). *This has been delayed and is now due some time in 2007. As of early December 2006, the Government's proposed changes have not been issued, suggesting possible subsequent delays given the need for ensuing consultation on these changes and further stages towards adoption*
- and by staff resources available to the Planning Policy team (the exact extent of which was subject to some uncertainty, until early 2006)

The need for a comprehensive evidence base to inform and underpin the new LDF is fully appreciated and this work was commenced in mid 2006, beyond this monitoring period. Resources to deliver this took a considerable time to secure but are now in place.

Revisions to the LDS

Following significant staff changes during 2006, including the loss of three full-time staff and a more up-to-date assessment of the work involved in developing documents within the Local Development Scheme, it was clear that a bottleneck would occur in early 2006. At that time the top priority was to adopt the emerging Local Plan. However, this critical lead in time towards adoption was scheduled to clash with the dates originally proposed to begin production of three major Supplementary Planning Documents (SPDs):

- Development Brief for the Chilton (mixed use) development package
- Affordable Housing and
- Retention of Employment Land

These documents remain important areas of work to progress. However, the District Council has identified an urgent need to reconsider the need for documents to be produced in their current form and to alter the start and completion dates of these documents within the Local Development Scheme. Circumstances around the proposed Chilton Brief have changed over time. A separate masterplanning exercise has been progressing in parallel with the Local Plan and feeding back into it, at stages where changes to the Plan were proposed. This Brief does not need to be produced as a formal SPD and will instead act as a masterplan to guide the planning applications that come forward for Chilton and as a basis for Environmental Impact Assessment of the scheme. Accordingly, this was deleted from the LDS as a formal SPD during 2006.

Clearly, commencing work on the other two SPDs to produce draft documents in February – March 2006, whilst taking the local Plan towards adoption and consulting on Post Inquiry Modifications at exactly the same time, was not feasible for a team of the Planning Policy team's size.

Commencement of work on the other two SPDs (Affordable Housing and Employment Land Retention) was therefore postponed until after the Local Plan was adopted (with a deadline of mid July 2006) and the LDS was revised accordingly. The production period can remain the same, so proposed completion would become scheduled for 2007. However, given the considerations outlined above regarding work to complete the Local Plan, combined with a very substantial shortage of suitably able officers in the Policy team (with only one skilled / experienced officer at its disposal between June and end of November) making a start on these SPDs was not possible. This commencement had to be deferred until early 2007 when the team's complement will expand to three suitably qualified officers.

Issues and Options consultation stage for Core Strategy is due between December 2006 and January 2007, although the residual impact of adopting and finalising the Local Plan rendered this impossible given the need to prepare a sound evidence base in advance. A robust evidence base is required in order to comply with the requirements of the new planning system. The idea of following the Core Strategy with the Site Specifics document is still considered appropriate and this approach should be retained, since the high-level strategic questions of where future development in the district should be focused need to be resolved first before considering in depth which land allocations should be pursued.

Recommendations on LDS:

1. Revise commencement date for work on Core Strategy Development Plan Document (DPD) and therefore its ensuing programme as well
2. Revisit programme for production of Site Specific Allocations and Policies DPD to a timetable that reflects the above deferral: this will also need to be deferred considerably
3. Defer commencement of production of Affordable housing and Employment Land Retention SPDs (and ensuing programme accordingly)
4. Revise LDS programme to illustrate the actual production timetable for the SCI (as delivered)

3(i) Policy Non-Implementation

This section deals with policies of the adopted Development Plan that are not being implemented (reg. 48, (4) & (5) refer). The regulations also require analysis of why policies are not being implemented and the local authorities proposed response to any such situations. It is considered that assessing the implications of policy non-implementation first will be useful in arriving at the final proposed action(s) where any are to be taken.

Policy	Reason(s) Policy Not Being Implemented	Implications	Proposals
HS 01a	This was deleted as a pre Inquiry change, because dwellings were not being developed at the rate required by the Structure Plan.	That there would be no phasing of housing development.	No change proposed, as completion rates are still low, and the policy has been deleted through the Local Plan review process.
HS07	This policy is used some times but not every time it is appropriate, the analysis required is complex but it is also considered effective when used. Rural Exception – Local Needs Housing	The policy may not be used when it may be important	Work closely with the housing enabling officers and other people with relevant expertise to ensure that the policy is used correctly.
HS 09	Parts of the policy relating to certain sites were not being implemented, some had consent and others were not considered suitable for development. Housing Allocations.	The Local Plan Inspector has amended the policy deleting two sites from the original policy	The amended policy has been adopted as recommended by the Inspector.
HS 17	Part of the policy sought to restrict the extension of smaller dwellings but this part was not upheld by Inspectors at appeal and was also rejected by the Local Plan Inspector.	The implications are that small dwellings will get larger and reduce the stock of smaller dwellings available for first time buyers those on low incomes.	The revised policy has been adopted, and the section referring to small dwellings has been deleted from it.

Commentary

There are relatively few policies not being implemented and many of the problems or issues raised by this have been dealt with through the Local Plan Public Inquiry. All the above policies have been amended or deleted following the Inspector's report. We are now in a new situation and this will have to be reviewed over the next monitoring year. The implementation of the altered and other policies will have to be considered in the next annual monitoring report.

Policy HS 07 is on occasions not being used on appropriate cases; this may be due to the level of analysis required, but affordable housing is important and we must look at viability if necessary. The housing enabling officers have a range of experience and contacts to ensure that the policy can be applied appropriately.

3(ii) Policy Performance

This section has been included as an extension of the regulatory requirement (reg. 48, (4) & (5) refer) to examine policies not being implemented. The section aims to consider the performance of policies in achieving the broad aims and objectives of each part of the Development Plan and against the Core Output Indicators.

Policy	Assessment of Performance	Implications	Proposals
Babergh Local Plan Alteration No1 1995			
HS02	Reasonably effective	The policy may not be as effective as hoped	Work with development control to improve the effectiveness of the policy
HS03	Effective		
HS07	This policy can be reasonably effective, but can involve considerable work	These are discussed above	See above, in section on policies not being implemented.
HS10	Not commented on in the survey		Keep monitoring the policy in future years.
HS12	The policy is considered effective		None
HS14	The policy has a range of responses from very effective to ineffective	The policy is generally effective in controlling the quality of dwelling design, but there may be problems in certain circumstances	Identify where the weaknesses are and try to ensure that the policy is used effectively
HS20	Reasonably effective		Keep monitoring the policy in future years.
HS21	This policy has mixed success	That the policy is not achieving it's objectives to	Work with development control officers to improve the

		safeguard residential amenity and allow some commercial uses in Long Melford	effectiveness of the policy
EM01	Effective		
CR01	Effective		
CR38	Effective		
CN13	Effective		Keep monitoring the policy in future years.
RE04	Not commented on in the survey		Keep monitoring the policy in future years.
RE18	Not commented on in the survey		Keep monitoring the policy in future years.
RE19	Not commented on in the survey		Not commented on in the survey
TP14	Effective		
TP15	Not commented on in the survey		Keep monitoring the policy in future years.
TP17	Not commented on in the survey		Keep monitoring the policy in future years.
Babergh Local Plan Alteration No2 Second Deposit Draft 2003			
LP01	Effective		
CR12	Not commented on in survey		Keep monitoring the policy in future years.
CR13	Effective		
CR14	Effective		
CR15	Effective		
CR16	Effective		
EN05	Effective		
EN10	Effective		
EN17	Effective		
EN22	Effective		
EN25	Effective		
EN27	Effective		
HS01	Effective		
HS04	Effective		
HS05	The policy has mixed results and can be abused, it deals with replacement dwellings in the countryside	The policy is not consistently applied and will lead to a progressive change in the countryside	Review the policy with development control; consider additional guidance.
HS06	Effective		
HS08	Effective		
HS08a	Effective		
HS09	Effective		
HS11	Effective		
HS13	Effective		
HS15	Effective		
HS17	Effective		
HS18	This policy is	There may be	Review the

	considered both very effective and ineffective. It deals with provision of a mix of dwellings.	insufficient provision of smaller dwellings	effectiveness of the policy particularly in the light of the housing market assessment (when it is carried out).
HS19	This policy has had a mix of results, it deals with annexes.	There may be new separate dwellings created, when that is not the intention.	Consider the policy's usage with development control
HS22	Not commented on in the survey		Keep monitoring the policy in future years.
HS25	Not commented on in the survey		Keep monitoring the policy in future years.
HS27	Not commented on in the survey		Keep monitoring the policy in future years.
EM02	Effective		
EM02a	Effective		
EM04	Effective		
EM06	Effective		
EM12	Effective		
EM12a	This policy had mixed results, it deals with expansion of existing employment uses	Lack of consistency in the approach to dealing with local companies	Agree with development control an approach to the use of this policy.
EM15	Effective		
SP01	Effective		
SP02	Effective		
SP03	Effective		
SP06	Effective		
SP07	This policy had a range of comments; it deals with farm shops.	Farm shops may be established even where there is insufficient produce from the farm to justify the farm shop	Consider with development control how to make the policy more effective in it's implementation
CR02	Effective		
CR05	Effective		
CR06	Effective		
CR09	Not commented on in the survey		Keep monitoring the policy in future years.
CR22	This policy had mixed results, it concerns change of use of farmland to garden use.	There could be a change in the appearance of the countryside with increasing urbanisation as gardens encroach into arable land	Discus with development control ways to make the policy more effective
CR24	Effective		
CR25	Effective		

CR27	No comments in survey		Keep monitoring the policy in future years.
CR29	Effective		
CR30	Effective		
CR31	Effective		
CR32	Effective		
CR33	Effective		
CN01	Effective		
CN30	No comments in survey		Keep monitoring the policy in future years.
CN31	No comments in survey		Keep monitoring the policy in future years.
CN10	Effective		
CN14	Effective		
CN02A	Effective		
CN23	Effective		
CN27	Effective		
RE03	Not commented on in the survey		Keep monitoring the policy in future years.
RE11	Not commented on in the survey		Keep monitoring the policy in future years.
RE20	Not commented on in the survey		Keep monitoring the policy in future years.
TP01	Not commented on in the survey		Keep monitoring the policy in future years.
TP03	Not commented on in the survey		Keep monitoring the policy in future years.
TP18	There are concerns about the effectiveness of this policy. Parking in new development.	Opportunities are missed to improve the use of forms of transport other than the car.	The policy has been amended through the Local Plan review process and the effectiveness should be reviewed with development control officers
TP19	This policy had mixed success. Green Transport Plans.	Green travel plans are important and the policy may not be used where it is appropriate	Explore ways to make more effective use of this policy
SD01a	This policy had mixed results. Safeguarding primary shopping frontages.	The vitality and viability of the town centre may be adversely affected	Review the use of this policy with development control officers
SD02	This policy had mixed results. Business and service uses, in Sudbury town centre.	The type of uses in mixed use areas may not be those that were intended	Review the use of this policy with development control officers
SD05	Effective		
SD11	Effective		
HD01a	Not commented on		Keep monitoring the

	in the survey		policy in future years.
HD03	Effective		
CP01	Not commented on in the survey		Keep monitoring the policy in future years.
Suffolk Structure Plan 2001			
ENV1	Effective		
ENV3	Effective		
ENV4	Effective		
ENV6	Effective		
ENV8	Effective		
ENV14	Effective		
ENV16	Not commented on in the survey		Keep monitoring the policy in future years.
ENV17	Effective		
ENV19	Not commented on in the survey		Keep monitoring the policy in future years.
ECON2	Effective		
ECON3	Effective		
ECON4	Effective		

Commentary

A survey has been carried out of development control officers and their use of policies and whether they consider the policies to be effective. The survey covered the policies they are most likely to use from the adopted 1995 Babergh Local Plan, Alteration No 1 the Babergh Local Plan Alteration No2 Second Deposit Draft 2003 and the Suffolk Structure Plan 2001. The only policies considered from the 1995 plan are those carried forward largely unaltered into the Second Deposit Draft 2003 and the policy numbers shown are those given in the Second Deposit Draft 2003.

The majority of policies were considered effective or very effective (67 out of 105 surveyed 64%), with a further 23 (22%) with no comment. Only 15 (14%) were considered in need of further refinement in order to ensure they are more effective. Some of these policies though have been used effectively and so it is hoped that they can be used effectively in the majority of circumstances, rather than with certain applications only. In most cases the proposed response has been to discuss with development control officers how to improve the use of the policies and make them more effective, this will take place over the next few months.

Ten of the policies causing concern about the effectiveness of their use have been amended through the Local Plan review process and it will take time to fully understand the implications of these changes on the use of the policies. The other five policies have not been amended and so will operate as they have in the past, there may need to be an agreed way forward for officers to deal with applications where these policies are relevant and possibly some additional member training. Problems have arisen with the way members interpret some policies. The policies, which have not been amended, are, HS19 Annexes, EM12a Expansion of Existing Employment Sites, SP07 Farm Shops, TP19 Green Travel Plans and SD01a Sudbury Principal Shopping Area.

From a listed building point of view there are two policies which are considered very effective, they are CN10 and CN02a and it is possible that other related policies should be merged with them, as they are not considered as effective on there own.

Policies which are considered effective or where no comments were made about them will continue to be monitored to establish whether the situation changes over the next year.

3(iii) Commentary on Appeal Decisions

There were 28 appeals against the Council's decisions to refuse planning permission during the monitoring period. Eight of these were allowed (28.6%) but 20 (71.4%) were dismissed. In the separate Listed Building and Conservation Area Consent appeals process there were only 2 appeals and both were dismissed. This suggests generally that the policies are effective and that they are used appropriately.

Where appeals were lost there was a spread of reasons why this was the case and a variety of policies were used. No particular conclusions can be drawn from these varied decisions for the policies used. In one decision to grant consent for a new house in the countryside the Inspector considered that usual policy considerations were outweighed by other material considerations arising from the circumstances of the individual site.

One issue, which did seem to cause a problem, was boundary treatment and new entrances to properties in rural areas. There is no specific policy relating to this issue with the result that appeals met with mixed results. In discussions with planning officers last year this problem was also raised, which suggests that a new policy may be required in the future.

4. Housing Delivery

(i) Housing Trajectory

Introduction

The first point to note is that until the emerging Regional Spatial Strategy is adopted the Council has to compare its rate of housing development initially against that set out in the Suffolk Structure Plan 2001 (Policy CS8). The Structure Plan housing allocation for Babergh was 6,900 for the period 1996 - 2016 (345 per annum). Having said this, it also needs to monitor against the development rate that will emerge through the new RSS. The latest available information on the Draft East of England Plan as the new RSS (replacing Regional Planning Guidance 6) is that it sets out a figure of 5,000 + 600 dwellings (total 5,600 or 280 per annum) for Babergh during the later period of 2001-2021¹. The 5,000 dwellings are deemed as the appropriate provision for Babergh district's own needs.

The 600 dwellings element is allocated to the Ipswich Policy Area (including the Ipswich fringe parishes). The East of England EiP Panel sees this element of provision as providing for Ipswich's own needs, rather than those of Babergh. This then represents a decrease of 1,300 dwellings overall for the district compared to the previous period looking at the two simply. Expressed another way, the new draft target is 81.16% of the old figure. However, the situation is more complex than this. Clearly the level of completions between the two periods, that is 1996-2001, will be important to assess. Three sets of monitoring record figures available cite this figure as:

1. 1,156 (Babergh Council Tax record data on stock change alone)
2. 1,464 Babergh DC (Building Control) information alone; and
3. 1,639 respectively; the latter including Suffolk CC data contained in the Structure Plan (1996-99) of 1,020 dwellings and completed through adding the 2 final years of Babergh DC (Building Control) information (619 dwellings).

Total range = 483 dwellings

Figure 1 (above) is likely to be too low, as it only covers the period from July 1996 - end March 2001 and thus excludes the first 3 months of the monitoring period

At present it is difficult to establish which figure is the most reliable. However, if the SCC figure is more accurate, the rate required to reach the Structure Plan target of 1,725 (345 x 5) has not been achieved, with an identified shortfall of 86. However, if the medium figure is correct then the shortfall is 261 and if the lowest figure is more accurate then the shortfall becomes 569. Accordingly, there appears to have been under-provision. It will now be a priority to establish the full extent of that under-provision but it is suspected that the historical Babergh Building Control figures are probably not fully reliable (in their precise time recording of completions). There could be reasons why the Council Tax records are not completely reliable either, because of possible delays in adding dwellings to the total stock between their construction and banding assessment / occupation by residents.

¹ * Figure recommended by EiP Panel in their report of June 2006 following examination of RSS

Housing Completions 2001-06 (reg 48 (6) & (7) refer)

Years	Net additional dwellings (Ann req. 345 (SSP) / 280 (RSS))	Net additional dwellings – Ipswich Policy Area (Ann Guide Figure 55 (SSP) / 30 (RSS))	% of total new and converted dwellings on PDL
		<i>NB These figures are included in the previous column</i>	
2001/02	242 (inc. 136 = 56.2% windfall)	105	57
2002/03	510 (inc. 364 = 71.4% windfall)	108	39
2003/04	212 (inc. 132 = 62.3% windfall)	10	55
2004/05	187 (inc. 164 = 87.7% windfall)	0	43
2005/06	189 (inc. 150 = 79.4% windfall)	6	68
Total	1,340 (reqs. 1,725 / 1,400)	229 (Guide 275 / 150)	Average 52.4

Suffolk Structure Plan 2001 Trajectory (1996 – 2016)

The first trajectory graph at Figure 2 presents a basic scenario based upon circumstances that are now largely out-of date. This depicts the housing requirements arising from the Suffolk Structure Plan 2001 (period 1996 – 2016) and shows that based only on previous annual completion trends (1996 – 2006) future completions and overall stock are projected to remain in under-supply. The assumptions behind this projection need to be examined, since past trends by themselves are not always a good indicator of what will happen in the future. In particular, a major change in circumstances has recently come about with the adoption of the Babergh Local Plan (2nd Alteration). The Suffolk Structure Plan and its allocation of 6,900 dwellings from 1996-2016 will be replaced in 2007 by the new RSS.

Housing delivery particularly during the period from 2001 – 2006 came predominantly from windfall sites, as the table above demonstrates. Given that there was no up-to-date adopted Plan during this period, this is unsurprising, the Local Plan Alteration No. 1 having been adopted in 1995. In addition, two of its large allocations (Rugby Ground site, Great Cornard and St Bartholomews Priory area, Sudbury) failed to materialise during that period. Together, these sites can be expected to yield some 500 dwellings. These factors are likely to help explain why completions were low during this period (except for 2002-3). Recent windfall delivery rates also exceed the assumptions on windfalls used for the development strategy for the period covered by the new Local Plan (90 units per annum). Work is currently being carried out to research historical windfall rates further back than the above period.

Housing Supply Table 1996-2016 (Suffolk Structure Plan 2001)

Whole district (including Ipswich Policy Area)					
Completions 1996-2006	Commitments 2006 (-5%)	Other sites where principle of development	New Adopted Plan Allocations	Windfall Assumptions 2006-2016 (10 years at	Total

		accepted (-5%)		90 p.a.)	
2,804	1,221 (1,160)	581 (552)	1,850	900	7,356 (7,295)
Ipswich Policy Area (BC Records)					
Completions 1996-2006	Commitments 2006 (-5%)	Other sites where principle of development accepted (-5%)	New Adopted Plan Allocations	Windfall Assumptions 2006-2016 (10 years at 10 p.a.)	Total
592 (259 + 333)	27 (26)	169 (161)	30	100	918 (909)
Ipswich Policy Area (Council Tax Records)					
746 (514 + 232)	27 (26)	169 (161)	30	100	1,072 (1,063)

The table shows that given the available data, the Council's development strategy can be expected to meet the Structure Plan requirement for 1996-2016 comfortably. A small negative allowance needs to be made for non-implementation of planning permissions and the recent Local Plan Inspector endorsed a locally set figure of 5% for this. This might also apply to the new allocations but experience shows that these allowances are far more likely to be associated with delays than actual non-implementation. Working against this, experience also shows that Local Plan allocation sites often end up producing higher dwelling numbers than the allocation originally envisaged and whilst some sites may transpire in the opposite trend, the former scenario is more commonplace. Even assuming the worst case, with a 5% non-implementation allowance also applied to the allocations, the strategy can still be expected to yield some 7,175 dwellings during the period to 2016. In addition, recent experience shows that the assumptions used here for windfall dwelling delivery are set very low.

No specific housing allocation figure was prescribed for the Babergh part of the Ipswich Policy Area in the Structure Plan, although Policy HS26 (formerly HS10) of the 2nd Alteration Plan and its predecessor, HS15 of the 1st Alteration Plan in 1995, both took a restrictive stance towards residential development in the Ipswich fringe. However, for indicative purposes the Structure Plan envisaged 1,100 dwellings in the IPA from 1996-2016. Accordingly, the provision that was calculated in that document appears to be a relatively accurate prediction.

Conclusion: Sufficient land and sites provided to meet Suffolk Structure Plan (2001) requirements for the period 1996-2016.

East of England Plan Trajectory (2001 – 2021)

The second trajectory graph at Figure 3 shows a more up-to-date scenario and reflects the anticipated housing requirements (5,600 in total) of the new RSS: the East of England Plan covering 2001 – 2016. This also takes more account of the adoption of the new Local Plan (Alteration No. 2) in 2006. The allocations in this are expected to provide a further 1,850 – 2,000 dwellings approximately. Very few 2nd Alteration Plan allocated sites have been developed, since its first draft stage in 2001. A few sites allocated in that draft document were developed contributing a limited number of dwellings but these were taken into account in the development strategy for the final adopted Plan.

The new Plan allocates sufficient sites to meet known Development Plan targets, with some additions that the Local Plan Inquiry Inspector considered necessary to meet these

targets with a good degree of certainty. Although the graph shows these sites plotted separately from the other development projections lines, the dwelling numbers shown for the major sites (mainly those allocated but with some large windfalls) have to be added in to the other projections. The effect of this would be to bring the projected line into a satisfactory correlation with the development numbers needed overall, although the actual delivery rate, year on year, against that required, may not always be harmonious.

Since the new Plan's adoption (June 2006) and indeed beforehand too, a flurry of potential development activity has been encountered, with the landowners / developers of many large sites approaching the Council for pre-application discussions. This shows clear indications of intentions among development sector interests to pursue planning permissions for very substantial scale residential development. The smaller allocated sites in particular can be expected to be delivered relatively quickly as a general rule, where the issues delaying or stifling development can usually be expected to be less difficult to resolve than on the major sites.

Development densities may increase, for example, as a result of PPG3 / PPS3. Housing and land markets will fluctuate and the effects of this must also be considered. However, it is difficult to predict these fluctuations and changes in balance in housing supply and demand. These are areas of further research that the Council will need to carry out and guidance on carrying out Housing Market Assessments is now available. The Council is already well-progressed with preparatory work for a Housing Market Assessment exercise and this is expected to begin in early 2007.

In Babergh there is a recent history of numerous large sites in the Sudbury / Great Cornard areas in particular, taking a very long time to achieve a full planning permission. This issue was reflected in low dwelling delivery numbers for the period from 1996 – 2006. This has frequently been associated with complex Section 106 agreements (such as the Rugby Ground site, Great Cornard and land near St Bartholomew's Priory / south of Springlands, Sudbury). Some such sites are now likely to come through the process to fruition. In addition, improved ongoing monitoring will enable a fuller annual analysis of housing development against completion targets.

However, it must be recognised still that the means available to local planning authorities to speed up delivery 'on the ground' are limited. For this reason, a full dialogue will be opened up with local landowners, developers, housebuilders and agents to explore barriers to delivery and possible solutions. The Council has begun this process prior to commencement on work for this AMR. Developers, agents, and landowners of all but the smallest sites listed in the Housing Trajectory table were contacted to establish their views on when they see their sites coming forward for delivery. Discussions at some length proved useful in determination of when the bulk of the district's future residential development can be expected and this information was incorporated into the table.

There are new large sites allocated in the Local Plan, plus other smaller sites and windfall sites that are expected to deliver the Structure Plan housing requirement overall. Most of these larger allocations are at the preliminary stages in their delivery, with some notable exceptions.

Housing Supply Table 2001-2021 (RSS: East of England Plan)

Whole district (including Ipswich Policy Area)					
Completions 2001-2006	Commitments 2006 (-5%)	Other sites where principle of development	New Adopted Plan Allocations	Windfall Assumptions 2006-2021 (15 years at	Total

		accepted (-5%)		90 p.a.)	
1,340	1,221 (1,160)	581 (552)	1,850	1,350	6,342 (6,252)
Ipswich Policy Area (BC Records)					
Completions 2001-2006	Commitments 2006 (-5%)	Other sites where principle of development accepted (-5%)	New Adopted Plan Allocations	Windfall Assumptions 2006-2021 (15 years at 10 p.a.)	Total
333	27 (26)	169 (161)	30	150	709 (700)
Ipswich Policy Area (Council Tax Records)					
232	27 (26)	169 (161)	30	150	608 (599)

Again the table shows that the Council's existing development strategy, through its newly adopted Local Plan, can be expected to deliver enough land and sites to meet the draft RSS housing requirements for the period from 2001-2021, including factoring in all worst case scenarios.

The East of England Plan in its latest form, prescribes a specific housing allocation figure for the Babergh part of the Ipswich Policy Area: 600 dwellings. Policy HS26 (formerly HS10) of the 2nd Alteration Plan maintains a restrictive stance towards residential development in the Ipswich fringe. The above data suggest that this allocation figure would be appropriate and these also confirm that neither new land allocations are necessary in this location, nor is the acceptance of any substantial windfall sites for residential development.

Conclusion: Sufficient land and sites provided to meet East of England Plan requirements for the period 2001-2021.

(iii) Affordable Housing

This issue has become a top corporate priority for the Council in recent years. In the past, delivery rates were low but the issue has become an increasingly severe problem with house prices in the area increasingly outstripping local income levels. Effective Development Plan policies to address the issue were not available but like many local authorities, Babergh has acted to plug this gap. The Council has become much more proactive in this area of activity and delivery rates have risen significantly. Babergh now has an affordable housing delivery programme seeking to secure 700 new units of affordable accommodation between 2004/5 and 2009/10.

The Council's approach is to enable the delivery of affordable housing in a variety of ways:

- Provision through Section 106 Planning Obligations on open market housing sites
- Developing Rural Exceptions Sites schemes
- Facilitating Housing Association land purchases (for HA's to deliver their own schemes)
- Use of Babergh owned land (often made available to HA's for delivery)
- Negotiation of schemes using Suffolk County Council owned land (such as county farm sites)
- Facilitating schemes on Church owned land
- Regeneration schemes (often involving demolition and building higher numbers on site, or rehabilitation of inadequate dwellings)

- Seeking funding for others' schemes through the Housing Corporation and through the Council's own finances

This approach aims to maximise the ability of the Council's limited resources to secure delivery and to tailor the approach to the individual circumstances of different sites and delivery contexts.

Working from the Council's affordable housing delivery (headline figure 700 units) the first 2 years of the programme can show the following data for progress (2004-5 and 2005-6):

Affordable Housing Delivery: Overall figures (as at December 2006)

No. Completed	No. Under construction	No. with planning permission	No. with SHG funding for 2006-8	Total
89	57	211	99	456

The figure quoted for total is that confirmed as in the overall, current delivery pipeline. The aim is to have 700 units either completed or in the development pipeline between 2004/5 and 2009/10. These data are compiled from Babergh Housing Services records and the methodology used is different in some respects from that used by Planning Services in Babergh.

Data on affordable housing completions gathered for the East of England Annual Monitoring Report 2005-6 by the Planning Divisions included the following details:

No. wholly funded by RSLs and/or local authorities	No. wholly funded through developer contributions	No. funded through mix of public subsidy / developer contributions	No. through unknown / other sources	Total
20	21	15	0	56

Rural Provision

Turning specifically to rural schemes, the figures (as at December 2006) are:

- 21 schemes completed (over the last 15 years)
- 6 schemes (included in above) delivered in last 2-3 years
- 198 rural homes delivered
- 4 schemes currently funded / in development
- 44 additional rural homes
- 7 potential schemes being progressed
- 5 homes from planning obligations sites

Regeneration

The figures for regeneration schemes (as at December 2006) are as follows: Currently 119 homes in progress across a total of 5 schemes, mostly in Sudbury / Great Cornard. This urban area heads up the district's greatest areas of affordable housing need. More regeneration schemes are in the pipeline.

Babergh Council Housing Stock (as at December 2006)

Babergh Council has retained its own stock of affordable Council housing. This forms a very important element of affordable housing in Babergh through re-lets of dwellings. This stock used to include some 6,000 properties, although 'right to buy' provisions for tenants have seen this reduce to under 4,000 dwellings. Housing Associations have developed between 1,500 and 1,700 properties in recent times.

(iv) Gypsies and Travellers

At present a Gypsies and Travellers Accommodation [Needs] Assessment is being carried out on Babergh's behalf jointly with four other local authorities in east Suffolk (by Salford Housing and Urban Studies Unit). The study will consider in detail the existing provision as well as potential demand from these groups as they pass through the district or where they wish to be residents in the bricks and mortar housing stock. The survey results should be available in spring 2007 and will feed into next years monitoring report.

The Local Plan contains a policy for Gypsy and Traveller sites (to be renamed HS42, formerly HS26) but no planning applications were received during the monitoring year. Over the same year there were 6 separate encampments (within the district) for short periods varying from 1 to 10 weeks and with 1 to 3 caravans involved. There are currently no temporary or permanent sites for Gypsies or Travellers in the district.

With the publication of Circular ODPM 01/06; the current mini RSS review being progressed by EERA specifically to address Gypsy and Traveller issues; and the above-mentioned GTAA work, the overall position in respect of Gypsies and Travellers is likely to evolve substantially during the monitoring year 2006-7 and these changes will be reflected in next year's AMR. (Information as at December 2006)

Gypsy & Traveller housing and land use requirements as a Local Output Indicator*		
No.	Requirement	Data
1	Number of authorised public and private sites (permanent and transit) and numbers of caravans on them over the period monitored and any changes during the period.	None
2	Number of unauthorised sites and numbers of caravans on them and any known changes during the period.	None
3	Details of any permissions granted for new public/private sites, or expansion of existing sites, during the period; and any other unimplemented permissions outstanding at the end of the period.	None
4	Progress of any work to assess the housing needs of Gypsies and Travellers in accordance with the requirements of housing legislation and planning policy.	None
5	If no assessment is underway, when is this anticipated to be undertaken and the nature of this work (County, (inter-) District etc).	Babergh District Council will work closely with Suffolk County Council to address any future monitoring requirements and consider the review of existing policies in the preparation of the relevant development plan documents.
6	An assessment of the use and performance	It is difficult to assess the

	of existing development plan policies on this issue.	performance of policies relevant to Gypsies and Travellers, as their use is very limited with no known application.
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** Babergh District has not historically been considered to have a significant current Gypsy or Traveller issue, with no sites being recorded as either authorised or unauthorised in the monitoring period. The presence of Gypsies and Travellers has always tended to be fleeting, as they pass through the District, but never actually encamp for any prolonged period. However, in view of recent changes from the government in this area (such as the new Circular on gypsies and travellers), it is recognised that the district council will need to develop monitoring systems in this category.*

Figure 2 Housing Trajectory: Suffolk Structure Plan 2001 (1996-2016)

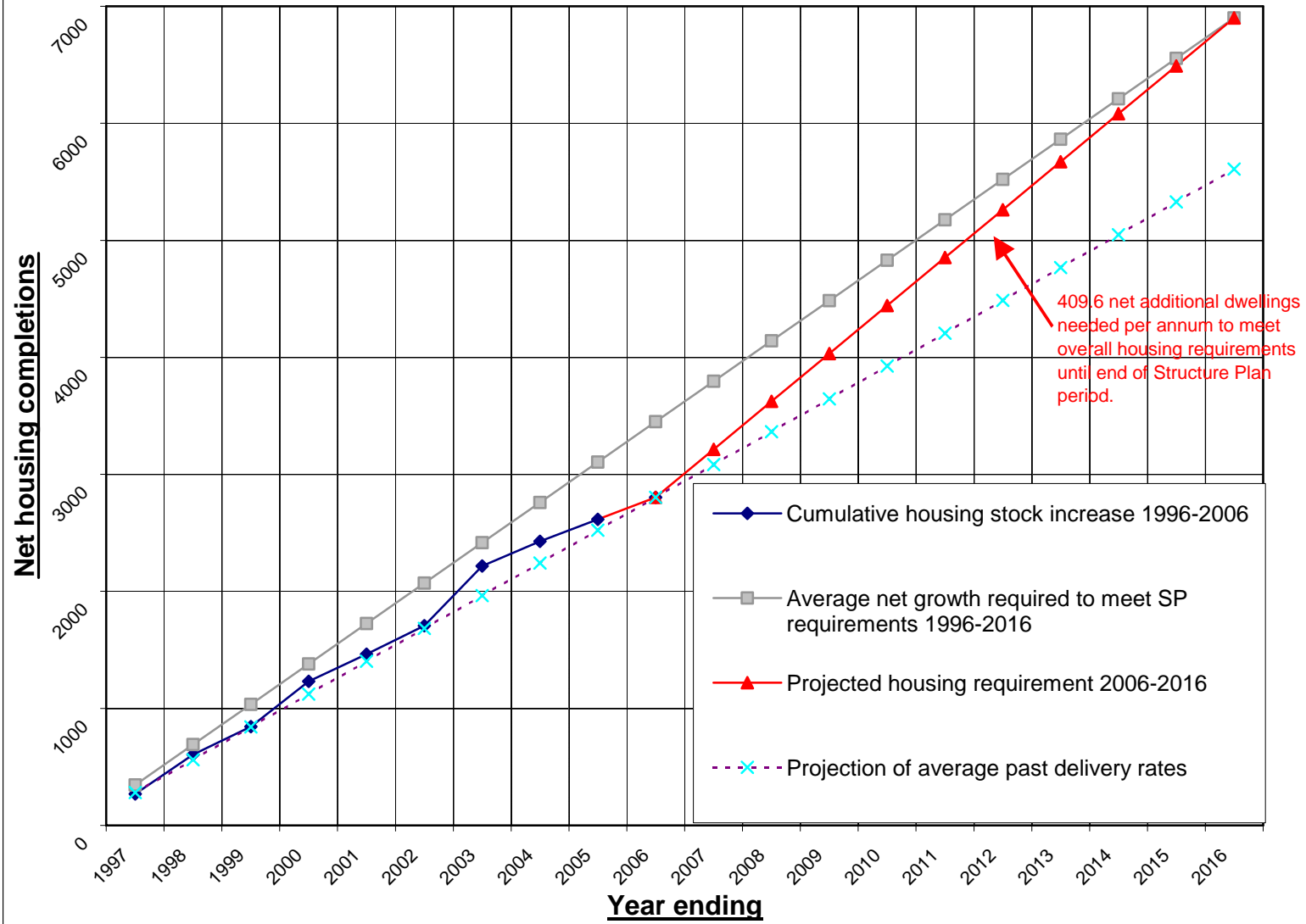
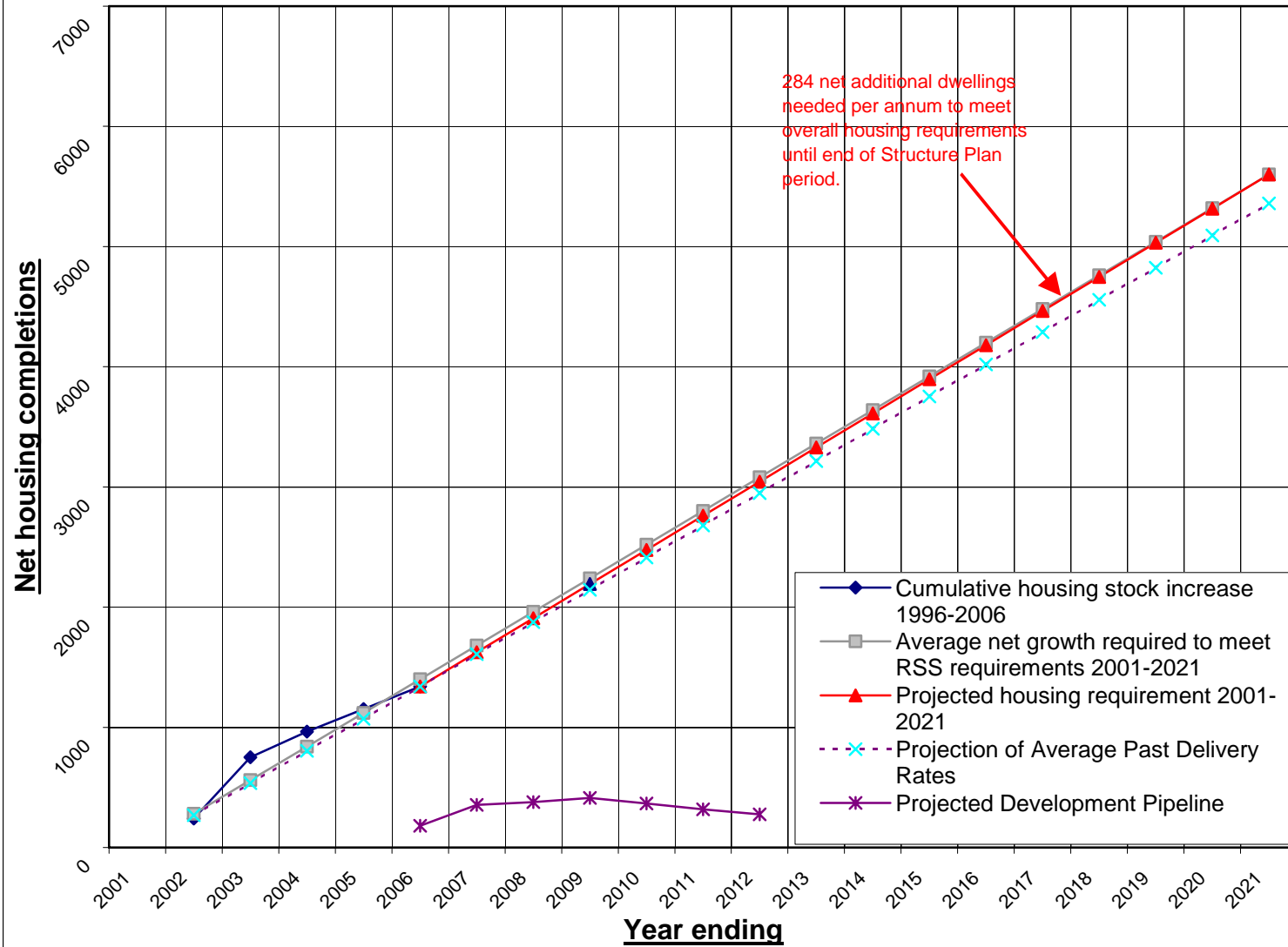


Figure 3 Housing Trajectory: East of England Plan (2001 - 2021)



5. Local Development Orders (reg 48 (3) (d) – (f) refer)

No LDOs applicable as none adopted.

Final Note: Public Accessibility of AMR via website (reg 48 (8) refers)

This AMR will be placed on the Council's website as soon as possible after submission to the Secretary of State