BABERGH DISTRICT COUNCIL

FROM: **Head of Natural and Built Environment** **REPORT NUMBER:** **K65**

TO: **STRATEGY COMMITTEE** **DATE OF MEETING:** **29 July 2010**

BABERGH DEVELOPMENT FRAMEWORK: CORE STRATEGY (INITIAL CONSULTATION DOCUMENT ON DISTRICT GROWTH)

1. PURPOSE OF REPORT

1.1 This report updates Members on the current situation at national level in respect of planning ahead for Babergh. Consequently, it advises on a proposed way forward, steps involved and outline timescales for the emerging new Plan (Babergh Development Framework) for the district. It provides the content of a first stage Core Strategy (CS) consultation document for Members' consideration. Approval is sought for a full and widespread public consultation exercise to take place throughout September / October 2010.

2. RECOMMENDATIONS

2.1 That the initial stage Core Strategy Growth Consultation ('Issues, Context and Scenarios for Consideration') document at Appendix A be approved for public consultation.

2.2 That the Head of Natural and Built Environment be authorised to make any revisions to the Core Strategy consultation document prior to consultation, subject to the revisions not altering the substance or intent of the document.

2.3 That the public consultation proposals in (paragraphs 6.3 & 6.19) be noted.

The Committee is able to resolve this matter.

3. FINANCIAL IMPLICATIONS

3.1 These are in the previous Strategy Committee report (paper J227) http://www.babergh.gov.uk/NR/rdonlyres/6A84496D-2814-48B1-A7AD-B35C497D4000/0/J227.pdf (8th April 2010). The time lapse since then does not change the circumstances or considerations that pertained at that time, since the date at which assessments of progress by councils on producing Local Development Frameworks for Housing and Planning Delivery Grant payment purposes takes place is 31 March each year. It should also be noted that 2010-11 is expected to be the final year of these payments and similar incentives / reward arrangements look very unlikely in future given the prevailing financial climate and public sector cutbacks in particular.

4. RISK MANAGEMENT

4.1 These considerations also remain unchanged. This report is most closely linked with the Council's Significant Business Risk No. 5 – Capacity; 4 – Political and Managerial Leadership; 9 – Project & Programme Management:

Risk Description	Likelihood	Seriousness or Impact	Mitigation Measures
CAPACITY: That insufficient skilled staff resource and overall officer capacity level are maintained	C Significant	2 Critical	Required resources assessed and allocated through the Council's annual integrated service and financial planning process
PROJECT AND PROGRAMME MANAGEMENT: Failure to progress development and implementation of LDF to an agreed timetable	Significant	2 Critical	NBE staff to develop, deliver and lead on a prioritised, resourced project timetable and plan – outline already included in this report
POLITICAL AND MANAGERIAL LEADERSHIP: Failure to adopt an up to date and robust plan may result in more successful challenges against existing planning policies. Also an absence of a 5-year housing land supply would render Babergh vulnerable to 'unplanned' development proposals	C Significant	2 Critical	Through the development of the BDF, and prior to decision making committees, provide briefings to all Members on the key issues and challenges

Babergh Themes addressed:

- Quality homes that local people can afford
- Strong and sustainable Babergh economy
- Cleaner and greener Babergh
- Vibrant places and strong communities

5. EQUALITY AND DIVERSITY IMPACT

5.1 The proposed consultation document strategy has been screened to assess whether a full EqIA is required in view of the 4 identified criteria. This concluded that a full EqIA is not required because although there may conceivably be potential to discriminate once the strategy progresses to a much more advance stage, the current document makes no choices whatsoever out of the possible range of options / scenarios from which to select. Accordingly, the proposed approach respects equalities satisfactorily.

6. KEY INFORMATION

Background and Proposed Actions

6.1 As Members will be aware, substantial progress had been made on producing a Core Strategy as the first element of the new BDF. However, the change of Government saw a significant change in planning with the revocation of regional (spatial) strategies (and therefore regional housing targets for districts) among other substantive matters and the possibility of further changes. This of course led to considerable uncertainty and consequently a delay in making progress. The Government has now made a follow-up announcement providing much greater clarity on its intentions and expectations of local planning authorities (as advised to all Members on 13 July 2010). This has been considered carefully and is considered sufficient to allow the Council to now move forward. It is evident that this is what the Government would expect Babergh to pursue and a clear message has been given that local authorities should press ahead with producing their Local development Frameworks. Officers have carefully considered recent and emerging policy documents from the new Government, alongside Ministerial statements and announcements, plus the new guidance on revocation of RSS and the broader move away from regionalism and towards Localism and are now able to suggest an appropriate response.

6.2 The proposed way forward in the form of main steps is as follows:

A. Take a step back in the process now, in order to establish the over-arching parameters for development and growth in the district in future over the forthcoming 20-year period to 2031. We need to arrive at a clear shared vision of how much the district could / should change, in what ways and over what period of time. This would be framed by identifying the criteria and framework around what should be the primary determining factors to guide future development levels. Accordingly, a range of differently formulated development scenarios have been constructed as a basis to inform consideration.

B. Take up the prompt to set future housing numbers (alongside job numbers) locally in co-operation with local communities.

C. Identify a range of appropriate ways and broad strategic locations in which this growth could be delivered.

D. Proceed with establishing the other and equally parameters of growth, in the form of a direction on economic growth ambitions – expressed through a relatively simple proxy of future job numbers.

E. Take up the call to respond positively and as rigorously as possible to the 'Localism' agenda. Having considered this carefully, it is suggested that we make a call directed in particular to parish councils to lead on a local response to us on how each local community sees its own future and wishes to help shape it – using the 'Place Shaping' role. We would ask each community to give a clear expression of its stance on future development and growth ambitions and appetite or otherwise for change. At the same time we would ask them to consider overall district-wide growth targets, thereby allowing them to consider the relationship between

the two scales, that is, how their local ideas on development / growth relate to wider notions of appropriate levels of development / growth for the whole district. The task of officers and Members will then be to try and reconcile this 'bottom-up' picture of local development aspirations with those for the district as a whole, based on a substantial body of evidence that concerns the overall district. It must be recognised that this may well prove a difficult task in practice.

6.3 Officers are firmly of the view that this bottom-up, locally focused, engagement needs to be a well supported process, with Babergh officers – and ideally Ward members – helping the local communities to co-ordinate and form a collective view on future development / growth. In order to enable this process we suggest the following specific measures for assistance:

i. Advance notice to parish councils of this exercise, thereby providing additional time to help them gear up for the exercise and to consider mobilising local communities to form their views.

ii. Provision of local information packs, providing a substantial body of local information and data to help inform their deliberation s and conclusions.

iii. Allied to this, officers will review the coverage of Parish Plans (produced by local communities) and completed Parish Plans, plus those in progress, which may be able to provide an early expression of locally agreed ideas of the future of each locality. We would also review the coverage and findings of all local, parish-based housing needs surveys (as these provide more locally detailed information than other information sources).

iv. The holding of parish workshop type sessions (organised along the suggested 3-way split of the district) where parish / other local representatives can attend and officers / Members can help them through the process. It also looks worthwhile to consider the possibility of obtaining the input and help of other officers / staff within the county to help in these events (for example, from Mid Suffolk DC and / or Suffolk CC, or other rural district councils).

Members views on these ideas would be especially welcome.

6.4 A Members' seminar was held on 21 July, allowing an opportunity to brief all Members on these matters and to provide a platform for discussion. This step of reporting to Strategy Committee represents the first step in Babergh's response and is considered an appropriate and proportionate approach in providing for full public consultation on a future district planning framework.

Proposed Growth Consultation Elements

6.5 In the interests of brevity, it is not necessary to provide thorough coverage of the content of the proposed consultation document. Paragraph 6.2 above makes it clear that the current exercise is all about establishing the over-arching parameters of development and growth for the district up to 2031. Helpful evidence-based background data to help provide some kind of comparative baseline from which to commence the debate about future housing numbers (as the first element of the growth consultation) would include:

- The Suffolk Structure Plan 2001 (to 2016) level (also adopted Babergh Local Plan level)
- East of England Plan 2008 (2001 – 2021) level
- Draft East of England Plan (2011 – 2031) level
- Previous housing completions level in Babergh 2001 – 2010
- Population and household projections (EERA; CLG/ONS; Babergh joint SHMA evidence consultants' study)

6.6 Whilst it is necessary to review the latter demographic projections and related modelling work, the very considerable range of forecasts that they provide raises some doubts over their use by themselves. These projections are considered to be more of a baseline or guidance than a primary determinant of future housing levels. Accordingly, officers consider that there is merit in considering future housing delivery numbers against the following range of considerations and 4 main scenarios are suggested:

Scenario 1: Balancing housing and economic growth
Scenario 2: Address affordable housing needs and market housing needs
Scenario 3: Depressed market and continuing the existing level of development
Scenario 4: Market intervention/ quick market recovery and continuation of existing level of development

The basis and features of each are set out and explained in the document at Appendix A, along with an outline of their pros and cons.

6.7 The second main element of the consultation paper turns to economic growth, in the form of jobs growth. Evidence to inform this issue comes from many forms and sources, starting with ONS Census data like travel to work areas and patterns and commuting data. The evidence also includes the recent Suffolk Haven Gateway Employment Land and Strategic Sites (joint) study; projections of future jobs growth using a range of known influences and variables (such as key drivers like growth of Felixstowe port and Adastral Park, Martlesham); and other joint research work carried out alongside the East of England Regional Assembly, Suffolk County Council, and Haven Gateway Partnership. Although it must be noted that job growth forecasts and targets cannot be a precise science, they should be treated as indicative targets to inform planning and decision-making and have importance by providing an expression of economic ambition, prosperity and social well-being.

6.8 In constructing possible new jobs targets, officers have been mindful of particular local factors for the district, including the following points:

a. That Babergh has limited potential for self-containment and sustainability, with only around a half of its residents working in the district and around 50% out-commuting with important implications for sustainability, and quality of life.

b. That average wages / salaries in the district are below the county and regional average and important implications for overall prosperity and ability to secure satisfactory housing, etc.

c. That whilst housing delivery throughout the Haven Gateway area has not only matched but exceeded sub-regional targets, delivery of jobs has fallen short and been outstripped. Again, the implications for sustainability are problematic and include issues around inequalities in the markets for housing and employment land, with the latter unable to compete with the former.

d. Related to the above, it is necessary to consider the sub-regional context with particular attention and this requires due regard to be paid to the circumstances of Ipswich in particular, in relation to employment land supply and economic performance.

6.9 A range of 3 different job growth scenarios is provided for consideration:

Scenario 1 – the "business as usual" approach – based on the forecast 2009 baseline scenario we assume the growth figures for the period 2011 to 2031 will be the same as the former RSS period 2001 to 2021. The (ELR) evidence research suggested percentage share of the new jobs for Babergh is 24% of the total ('shortfall') forecast figure of 22,860.

Scenario 2 – to use the ELR 'shortfall' forecast figure for Babergh of 8,100 jobs in Babergh and add one-third of the number that would have been necessary to achieve the former RSS target of 30,000 (assuming a three-way split between Babergh, Ipswich and Suffolk Coastal of the shortfall).

Scenario 3 – to use the shortfall forecast to 2021 of 8,100 jobs in Babergh and apply the same percentage growth to the jobs target for the district to 2031 as has been used in the former RSS (2001 – 2021) for the growth in new houses, i.e. 20%.

6.10 The 3rd and final element concerns an outline settlement hierarchy for the district and ways in which future growth could be accommodated sustainably in broad terms and at broad, strategic level locations. As housing and other needs exist in every area, the approach needs to ensure that there is some appropriate spread or distribution of development to all main areas and an appropriate allowance for rural areas as well. Given our evidence, national planning policy and the district's particular circumstances / character, the potential options in this area are relatively limited. This accordingly anticipates that broad directions for growth will need to be identified and prioritised by preference and suitability, although the number and size of these will need to be determined by the eventual development levels that remain to be determined. Work on this to date indicates that the following alternatives are likely to be available from which to select preferences:

Sudbury / Great Cornard: 4 possible growth directions;

Hadleigh: 3 possible growth directions;

Ipswich Fringe (within A14): 2 possible growth directions.

Other Considerations

6.11 The evidence base for the BDF is of great importance and the key points on this are as follows. Firstly, it is considered that the great majority of this is now in place and currently more than sufficient overall to provide basis on which to continue with the currently proposed exercise. Some additional and revised work and some updating will be carried out in coming months. However, if Plan preparation progress is delayed further significantly, there will increasingly be a problem of the evidence base being less up-to-date and less complete (as requirements evolve) and this provides a note of caution.

6.12 Another part of the evidence base is Sustainability Appraisal (plus Strategic Environmental Assessment and Appropriate Assessment). This work has mostly been completed as far as necessary now and these documents are available to view in the Members room, and at reception desk at the Council's Hadleigh HQ. These sources can be useful for informing comparisons between alternative choices and courses of action and will of course be used by officers in this way.

6.13 There is currently a vacuum in respect of any formal planning arrangements and development parameters for the Ipswich Policy Area (which now does not technically exist) or for co-ordinating development across either Suffolk or other geographies such as the Haven Gateway sub region. These points will need addressing as soon as possible and for the interim, continued joint working will be essential, pending any more formal arrangements, with a view to the forthcoming duty to co-operate applying to public bodies.

6.14 Related to this is the question of whether the abolition of RSS leaves any policy gaps. Work is underway to assess this question in more detail. However, it is considered that between what is already provided by the Council's extant Local Plan (and supplementary guidance); the considerable body of national planning policy and guidance; and what can be put into both the Core Strategy itself and subsequent planning documents (particularly the 'Development Management' policies document) policy coverage either is or will be satisfactory. However, a fuller assessment is being made as to whether there are any gaps that may be problematic in the interim period. Mention has already been made of the loss of policy coverage for the Ipswich Policy Area and Haven Gateway sub-region, for example.

6.15 One consequence of the RSS revocation is that of the requirement for Babergh to provide 15 Gypsy & Traveller pitches by 2011 no longer applying. Officers' suggested approach would be to be guided by the available evidence (which is considered to reliable overall) in respect of local requirements in this area. This would take the issue of Gypsy & Traveller provision out of the Core Strategy arena and explains why it does not form part of the proposed consultation document.

6.16 Work has been updated to ensure that Babergh still has a 5-year housing land supply, as this remains and important requirement. On this, however this is calculated, Babergh has more than a 5-year supply and is thus in a relatively good position. However, officers are mindful of the time required to progress this Core Strategy to adoption (as well as subsequent main planning documents) and lengthy delays could place Babergh in a very different position.

6.17 As advised above, officers are monitoring developments closely in respect of Governmental announcements and updates, etc., since prevailing circumstances are currently changing significantly. Recent indications are that details of the financial incentives to local areas for house building may be anticipated by the end of this July. Bringing other changes, the Localism Bill ought to be passed by November 2011. These matters will be analysed and taken into account as / where appropriate and it is possible that such changes may be reflected within this Core Strategy and wider BDF, as it progresses.

6.18 Although some other local authorities within our locality may end up reviewing their housing numbers as a result of these recent changes (RSS abolition in particular) it is considered helpful as a comparative exercise at least to consider development levels for other Suffolk local authorities and other neighbouring local authorities in Essex. The inter-relationship between these is important to consider, given that evidence indicates Babergh is part of a wider housing market and travel to work / economic area. This information is provided for Members' consideration at Appendix B.

Public Consultation and Member Involvement: Next Steps

6.19 The draft document is proposed for issuing for public consultation and this will provide all with the opportunity to make comments and influence the emerging Plan – from the outset. Those comments will be analysed and considered carefully. The exercise is to take place throughout September / October (for 8 weeks). Further details of on the approach to public consultation are set out above in paragraph 6.3 above and an update on the suggested public events will be provided by email message to all Members following this Committee meeting, when it is hoped that the position will be clearer to plan and arrange those events.

6.20 The ensuing period will be spent on analysing the responses and working up a draft (Core Strategy) Plan. It is considered that the imperative of budget setting early next year, followed by district council elections, mean that it will not be possible to report the draft Plan to Members until after the elections in June 2011. However, at that time the new Council will be given the opportunity to consider and exercise ownership over the Plan, as a basis for public consultation thereafter. The next steps will then be to consider whether to revise (and then reconsider / reconsult) or submit the draft Plan for independent examination towards late 2011, with adoption looking more likely in 2012.

6.21 A new Plan preparation programme for the whole BDF (that is a 'Local Development Scheme') will need to be prepared later this year but in the meantime, the use of 'realtime' information on the up-to-date position in respect of BDF development is being made. This is regularly reviewed and updated alongside all other useful BDF information, on the Babergh website and accessible as follows: www.babergh.gov.uk/babergh/ldf .

7. **APPENDICES**

A Proposed initial stage Core Strategy Growth consultation document (Issues, Context, Scenarios 2010).

B Data on development levels for Suffolk local authority areas and other neighbouring local authority areas.

8. **BACKGROUND PAPERS REFERRED TO:**

None.

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Appendix A
Core Strategy
The Future Growth of Babergh District to 2031

The issues, local context and scenarios for consideration - Summer 2010

Contents

1. District-wide housing growth – context, evidence and scenarios
2. District-wide employment growth - context, evidence and scenarios
3. Potential Broad Locations for potential growth

1. Housing growth in Babergh – determining the scale of district-wide growth in housing

Introduction

1.1 It is important that we plan for growth and further development to meet the future needs of the district and its residents, particularly as the Core Strategy will be a long term planning framework for the district. Key questions considered in this section are growth requirements and the level of housing growth we need to plan for in Babergh.

What you have told us so far

1.2 In the March 2009 Core Strategy Issues and Options consultation document we asked what would be the most appropriate level of housing provision in the district with options for lower or higher housing numbers, or housing numbers in accordance with the former RSS target. Most of the responses received (65%) were in favour of the provision of the then adopted RSS housing levels (as minima figures) in the district. Some support was also expressed for lower numbers than the RSS (20%) and least support for numbers higher than the RSS (10%).

1.3 Some of the justification for lower numbers included the following considerations: that the RSS target would have had an unacceptable impact on the environment, existing infrastructure, character of the district and communities, and that a lower number should be planned for as a result of the recession.

1.4 Some of the justification for higher numbers included views that higher numbers would enable recovery from the recession, would provide for housing needs and affordable housing needs, and higher numbers should be provided for in the Ipswich Fringe to enable regeneration of the Haven Gateway.

1.5 From your responses it is clear that you consider impacts on the environment, infrastructure, the character of the district, the recession, housing needs and affordable housing needs, and the economy as important considerations when determining housing growth to be accommodated in the Babergh District.

1.6 As the RSS has been revoked we will be considering housing growth scenarios for Babergh in the absence of regional housing growth targets.

National Policy Context

1.7 A good level of guidance in the form of national planning policy guidance (PPS1 and PPS3) is provided to steer these key questions outlined above. National policies set out Government's commitment to "improving the affordability and supply of housing in all communities, including rural areas" whilst respecting the key principles of "providing high quality housing that contributes to the creation and maintenance of sustainable rural communities in market towns and villages." In particular planning policy objectives include

providing "a sufficient quantity of housing taking into account need and demand and seeking to improve choice." Housing developments should be in "suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure" and the provision of "a flexible and responsive supply of land". It also indicates that' in determining the local' 'level of housing provision' account should be taken of' 'evidence of current and future levels of need and demand for housing and affordability levels'.

Local Context

1.8 The Babergh District is a predominantly rural area that adjoins the urban area of Ipswich (including a small part of this within Babergh) and contains just 2 towns. The largest of Babergh's towns is Sudbury/Great Cornard, situated in the west of the district.

1.9 As a rural district, the many small villages depend on the larger settlements and town centres for many of their needs. In this context the role provided by the major centres beyond the district is recognised, with the north of the district looking to Bury St Edmunds and Stowmarket; eastern parts and the Shotley peninsula to Ipswich and the south of the district looks to Colchester. The relationship to the main urban areas within and beyond the district is an important consideration underpinned by broad sustainable development principles. This helps to focus development for housing, jobs, shops and other infrastructure in the main urban areas. In a large, rural district with a dispersed settlement pattern like Babergh, many villages are remote from urban areas, therefore an approach to development tailored to Babergh's own local characteristics seems appropriate.

1.10 Given the above, it is suggested that Babergh can usefully be divided into three broad and relatively distinct areas: western, mid and eastern Babergh. The existing settlement pattern, population distribution, divisions within the housing market areas and pattern of employment / commercial market areas (plus distribution of employment sites) suggest this typology, and results in a town/urban area and a good distribution of large and smaller villages in each of the areas.

Western Babergh

1.11 The total population for this third of the district in 2001[1] was approximately 38,500 and it is estimated that it rose to around 40,000 in 2008[2]. This equates to a growth of 3.8% over this period. Sudbury and Great Cornard is the largest urban area in the western part of Babergh with a population of just over 21,000 in 2008[2]. Sudbury serves a large rural catchment area. This part of the district is relatively self-contained in relation to the influence of, and potential dependence upon, Sudbury.

1.12 Beyond Sudbury itself, a substantial network of 5 large, satellite, rural communities in close proximity form relatively large population centres in their own right (Acton, Bures St Mary, Glemsford, Great Waldingfield, and Long Melford) with a population of just over 11,100 in 2008[2]. These villages provide

[1] 2001 Census figures

[2] 2008 Mid-year population estimates developed by Suffolk County Council

important local facilities and services, and in several cases they provide a valuable contribution to jobs and commerce through their current employment land areas, and potentially through future additions. All of these services, facilities and employment areas help supplement those within Sudbury.

1.13 Lavenham is the only other large centre beyond Sudbury and the satellite villages, and is not as well-related to it. Lavenham had a population of 1,700 in 2008[2]. It enjoys a degree of self-containment, with some local employment opportunities, a small but attractive retail / service centre and a quality of historic environment that enables it to function as a considerable tourist centre.

1.14 A few other smaller villages in the western part of the district provide a more basic level of day-to-day facilities and services.

Mid Babergh

1.15 The total number of residents in Mid Babergh was approximately 19,900 in 2001[1] and this increased to approximately 23,700 in 2008[2] with a growth rate of 16% between these periods. Hadleigh is the second largest town in the district with a population of 8,500 in 2008[2]. It is a smaller, modest sized, traditional, market town located in the district's central (mid) third and is the primary centre for this area serving a relatively large rural catchment.

1.16 Given its limited scale and relatively limited service / facilities base, parts of its rural catchment inevitably continues to use larger nearby centres to the east and west (and some beyond the district).

1.17 Whilst Hadleigh is smaller than its urban neighbours to the east and west, it is partly supported by its small network of (3) relatively large villages (Bildeston, Boxford and Nayland) with a combined population of over 3,300 in 2008[2]. Several other smaller villages also provide for a basic level of facilities and services in this part of the district.

1.18 This area also has tourist attractions (such as Kersey village) and the Constable Country villages and countryside in the south.

Eastern Babergh

1.19 The total number of residents in this third of the district was approximately 24,900 in 2001[1] and 25,900 in 2008[2], a growth rate of 3.9%. The Ipswich Fringe includes part of the urban area of Ipswich that expanded into Babergh at Pinewood. The western fringe and town centre of Ipswich provide a focus for the eastern third of Babergh's population, as well as providing some jobs and higher order services for the middle third of the district. The Ipswich Fringe includes Pinewood, Wherstead, Sproughton, Belstead and Burstall with a population of over 6,600 in 2008[2].

1.20 This part of the district has considerable differences from the other two and prominent among these are the strong influence of the county town (the largest urban area and centre in Suffolk). This is of sufficient stature to exert influence over much of the other two thirds of Babergh (although some parts of the district will tend to look beyond Babergh to Bury St Edmunds and Colchester for service provision, employment, etc.). This area contains the major communication routes (A14 and A12, as well as the Norwich to

Liverpool Street railway line). These and developments beyond, such as Felixstowe port, are substantial infrastructure and economic assets. Ipswich is projected to grow considerably and the important economic role within the locality in the future will also continue.

1.21 To the south lies the Shotley peninsula, and the effect of the Orwell and Stour river estuaries make this a distinct, if relatively remote area, with Shotley perched at its very tip (some 11 miles from Ipswich). The peninsula also has the assets and attractions to benefit greatly from tourism, visitors and recreation. This is already evident with attractions such as Flatford Mill, Pin Mill, Alton Water reservoir and 2 marinas. The Stour and Orwell Estuaries are internationally important being designated Special Protection Areas and a Ramsar site, and are also within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty. Proposals for development are required to be assessed under the Habitats Regulations to prevent adverse effects on these sites.

1.22 This part of the district is relatively well served with 6 larger villages (Brantham, Capel St Mary, Chelmondiston, East Bergholt, Holbrook and Shotley) that help prevent the area from being highly remote from local services and facilities. These six villages had a combined population of over 14,100 in 2008[2]. A few smaller other villages on the peninsular supplement the network of service villages.

Background and the evidence

Previous benchmarks and comparative context

1.23 It will be useful before considering different scenarios for how much housing growth should be accommodated within the Babergh District to look at previous targets for housing numbers in the district and what information was used to determine these targets. Table 1.1 below summarises these targets, and helps to provide some comparative context for considering different scenarios for housing growth in Babergh for the future. It is important to note that all of the documents mentioned below were evidence based and arrived at through a process of involving many parties including various tiers of local authorities.

1.24 The Suffolk Structure Plan was adopted in 2001 and planned for the period between 2001 and 2016. The Structure Plan was replaced by the Regional Spatial Strategy (the RSS has now been revoked). The Structure Plan included a target of 345 new dwellings per annum for the Babergh District. This target was based on the following evidence/ information:

The Suffolk Structure Plan targets were based on the following assumptions:

a) The population of Babergh will increase by 7,500 between 1996 and 2016 (86,100 to 93,600, or just over 375 per annum)
b) The proposed increase in Babergh's dwelling stock by 345 per annum or 6,900 between 1996 and 2016 will compare with the actual increase of about 350 per annum or 2,800 between 1991 and 1999
c) Housing requirements will be for: 54% one person households, 19% households consisting of people sharing, and 25% will be cohabiting couples.
d) A contribution of 85 dwellings a year in Babergh (1,450 between 1999 and 2016) will be delivered from unallocated "windfall" sites, taking into

account past experience.

1.25 The RSS (referred to as the East of England Plan) was adopted in May 2008 and revoked by the Secretary of State on 6th July 2010. The RSS planned for the period between 2001 and 2021, and included minimum housing figures for the Babergh District of 5600 (including 600 within the Ipswich Policy Area) from 2001 – 2021. This equates to 280 new net dwellings per annum to be provided in Babergh.

The RSS targets were based on the following assumptions:

1) *Babergh's household figures will increase by 8,000 households 2001 and 2021 (or a 22% projected household increase). These results we formulated by Anglia Ruskin University, under the leadership of Professor Dave King using the "Chelmer Population and housing model" and presented by EERA in the "Revised 2001-based Population and Household Growth in the East of England, 2001-2021 (September 2005)" which directly informed the final East of England RSS (2008) figures. The projection of private households is made from the existing private household population and age/gender specific headship rates (numbers provided by ONS). The implied increase for the number of dwellings is the derived through assumptions for rates of change in: population, shared dwellings, multiple household occupancy, and vacancy rates.*

1.26 Whilst the RSS has been revoked, it is useful to note that the draft East of England Plan Review > 2031 which was published on the 12th March 2010 (with no formal status) included a minimum housing figure of 335 net new dwellings per annum for the Babergh District, equating to 6,700 new homes up to 2031. These figures did not include Babergh's unspecified share of the Ipswich Policy Area (IPA) housing figures. The IPA figure (shared between Babergh, Mid Suffolk and Suffolk Coastal) of 850 net new dwellings per annum, would have resulted in a total of 17,000 new homes to be built in the Ipswich Policy Area in the plan period.

The draft RSS Review > 2031 targets were based on the following assumptions:

1) *Household requirements in Babergh will grow 85 more per annum between 2011 and 2031 (335 pa) than existing projections between 2001 and 2021 (250 pa) (note that these figures do not include numbers in Babergh's part of the Ipswich Policy Area which is not divided in the draft plan to 2031).*

2) *The demand for affordable housing in England will increase by an average of 11% more per annum between 2011 and 2031 (46% of all completions) than existing projections between 2001 and 2021 (35% of all completions). The implications for Babergh are therefore that 66 more affordable homes per annum would be required and built between 2011 and 2031 (154 pa) than existing projections between 2001 and 2021 (88 pa).*

3) *As incomes are expected to continue to rise with economic growth, each household is expected to demand more space, raising the demand for bigger homes and gardens. There is an urgent need to build more of these homes for this and future generations.*

Source document:

http://www.communities.gov.uk/documents/statistics/pdf/1172133.pdf

Table 1.1: Comparative context for considering different scenarios for housing growth in Babergh

Document/source of target & time period	Annual Housing Growth Target
Suffolk Structure Plan 2001 - 2016	345
RSS 2008 – 2001 - 2021	280
Draft RSS Review > 2031	335 (exc Babergh's share of IPA housing)

Past rate of development in Babergh and existing housing land supply

1.27 It is important before we consider scenarios for housing growth to look at past rates of completions within the Babergh District and the current five year land supply.

1.28 Housing delivery is closely monitored through the Annual Monitoring Report and managed as far as possible. This document draws from the latest monitoring information – for the year 2009/10. The latest monitoring information shows that from 2001 to 2010 a total of 2,393 new net dwellings were completed in the district. This equates to 276 per annum based on former RSS targets. Completions have decreased significantly from 2008-09 (289 dwellings) to 2009-10 (185 dwellings) reflecting the market recession.

1.29 Although new home completions and growth in housing stock in the district are not exactly the same (the latter will include loss of housing stock including through changes of use, conversions, demolitions etc.) the information is sufficiently similar to be useful in considering growth over the last nine years. As we have figures for the last nine years for the annual increase in housing stock in the district we have used these to examine the actual increase and average percentage increase in the three areas of the district, west, mid and east[3]:

Table 1.2: Increase in housing stock, average growth over the period, distribution of the new housing stock across the district and average additional housing stock per annum

	Increase in housing stock 2001 – 2009	Average % growth over the period	Average change in housing stock per annum	Distribution of new housing stock
Western Babergh	1182	6.9	148	51.1%
Mid Babergh	704	8.1	88	30.4%
Eastern Babergh	427	4.1	53	18.5%
Total Babergh	***2313***	***6.4***	***289***	***100%***

1.30 From the Strategic Housing Land Availability Assessment and our Five Year Land Supply information it can be seen that there is sufficient land to provide for 2,704 new dwellings through existing commitments (sites with planning permission or where the principle of development has been established) or Local Plan housing allocations. Based on the former RSS target this equates to approximately 9.3 years of housing supply. It is therefore clear that Babergh has a good supply of land and based on the former RSS target that would provide for housing land supply until approximately 2020.

[3] Babergh District Council Tax Records

Population Growth Projections

1.31 One way of assessing how many new homes we need to plan for is to consider the predicted growth in population. We have looked at three different sources of information – two household growth projections, and one projection based on household formation.

1: Households projections 2006 – 2031

Source – unpublished projections commissioned by EERA to facilitate consultations about the review of the East of England Plan, prepared summer 2009

These household projections are led by the policies that were contained in the RSS and consequently the number of households and people is determined by the number of planned dwellings (based on the continuation of the RSS policies up to 2021 and therefore targets of 5600 new dwellings for Babergh) bearing in mind current established demographic factors such as household formation, published mortality and fertility rates and assumptions about vacancy rates and level of sharing amongst households based on locally available information.

The model predicted that Babergh had a population of 86,000 in 2006 and that it would rise to 91,300 by 2031 which is an increase of 5.5%. It also predicted that the number of households would rise from 36,900 in 2006 to 42,700 in 2031 representing a 15.7% change. If the completions from 2007-2010 is subtracted from the estimated increase in the number of households this could indicate a potential number of new homes needed as illustrated below.

No of households (2031)[4]	42,700
No of households in 2006[4]	36,900
Difference	5,800
Completions 2007 – 2010[5]	778

The difference minus completions for 2007 – 2010 could be seen to = number of new homes needed = **5,022 (239 per annum)**

2: Households projections 2006 – 2031

Source: CLG/ONS – this projection illustrates the impact of continuing the recent population trends identified by ONS

The outcome of a continuation of the RSS may be compared to household projections that CLG publishes. Although the household formation parameters are the same in both cases the outcomes are somewhat different because the CLG household projection illustrates the impact of continuing the recent population trends the ONS has identified rather than on RSS housing numbers. The CLG projections are underpinned by the ONS population projection and it is prepared for the whole

[4] Unpublished projections commission by EERA
[5] Babergh District Council Annual Monitoring Report 2008-09 and monitoring information for 2009/10

Country in a consistent manner.

The CLG model predicted that Babergh had 37,000 households in 2006 and this will increase to 50,000 by 2031. This is an increase of 35.1%. If the completions from 2007-2010 is subtracted from the estimated increase in the number of households this could indicate a potential number of new homes needed as illustrated below.

No of households (2031)[6]	50,000
No of households in 2006[4]	37,000
Difference	13,000
Completions 2007 – 2009[7]	778

The increase could be seen to = number of new homes needed = **12,222 (582 per annum)**

3: Using existing household formation rates

Source: Suffolk County Council, Ipswich Study Area SHMA Update, November 2009

Housing research for the Ipswich Housing Market (including the Babergh District) was completed during January 2010. In this study housing need was estimated based on population projections between 2007 and 2012; and 2001 Census information about new households forming in Babergh. This information was averaged to provide an annual average of new forming households in the District. Other considerations to determine newly arising housing need per year included the proportion of households unable to afford entry-level market housing and existing households falling into need and this then provided figures for the total newly arising need within the Babergh District (gross). To calculate the housing need up to 2031 the average annual need is multiplied by 21 years from 2010 up to 2031. The result of the calculation is shown below:

Gross total newly arising housing need per year = 377 per annum
(based on new household formation and need)

X 21 (21 years 2009 – 2031) = **7,917 (377 per annum)**

1.32 It is clear that whichever projection or assessment is used a large (to very large) number of dwellings would need to be built if all new households were to be accommodated. However, none of the population, household projections, or household formation rates and housing need assessments take account of recent house-building rates/completions, market conditions, or the availability and provision of employment in the locality, and they should only be used as crude background information.

Scenarios for housing growth

1.33 The Core Strategy must provide a clear local development plan for the future, and national planning policy requires the Core Strategy to plan for housing

[6] Unpublished projections commission by EERA
[7] Babergh District Council Annual Monitoring Report 2008-09 and monitoring information for 2009/10

delivery for at least a 15-year period. The strategy will need to provide a sufficiently robust and flexible framework for the district's future development needs and planning for a longer term would enable the strategy to adapt to changing circumstances. Planning for a longer period would also have benefits such as providing a clear long term planning framework for key infrastructure providers and creating opportunities to develop strategic comprehensive developments. It is therefore proposed that the Babergh Core Strategy should plan for a 20 year period up to 2031.

1.34 It is important that development in Babergh is underpinned by sustainable development principles with good access to homes, jobs and other key services available to all and that this is supported by the delivery of appropriate infrastructure ensuring a better quality of life for everyone, now and in the future. These considerations together with the aspects that the public highlighted during the first Issues and Options consultation in March 2009 such as the rate of previous development, the market recession and affordable housing needs have to be taken into account when developing scenarios for future housing growth in the district.

1.35 We have used available data and past monitoring records to develop four scenarios for housing growth in the district over twenty years.

Scenario 1: Balancing housing and economic growth

1.36 It is vital that housing and economic jobs/ growth are balanced in the interest of ensuring that future development is sustainable. The planning approach in Babergh to date has paid particular attention to ensuring that economic/ jobs growth is fostered to avoid an excess of uncontrolled housing growth at the former's expense.

1.37 This first scenario is based on trying to strike a balance between housing and economic growth, and that housing requirements are led by employment targets/ numbers. As three employment target scenarios are considered in this document, the housing requirements for Scenario 1 are calculated for each of the employment target scenarios as shown below.

1.38 Based on tax records in 2009 there were 38,309 dwellings in Babergh and according to the East of England Forecasting Model (Spring 2009) we had 39,900 jobs in Babergh. This equates to a jobs: homes ratio of 0.9 showing that housing and employment are well balanced in the district. The assumption used to calculate the housing requirements for Scenario 1 was based upon a continuation of the existing ratio of 0.9 jobs: 1 home.

1.39 The tables below set out the position on housing requirements for Scenario 1 and existing land supply, relying upon data collected for the most recent AMR for 2009/10.

A: Create 8100 jobs up to 2031

	No of dwellings
Number of houses to provide from 2010 – 2031 (based on ration of 0.9 x 8100 jobs)	7,290
Housing commitments	891
Remaining Local Plan housing allocations	1,813

Total housing supply	2,704
Residual number of dwellings to provide 2010 – 2031	4,586
Allowances for housing windfalls from 2021-2031	960
Sum of dwellings to plan for/ allocate	**3,626**

B: Create 10480 jobs up to 2031

	No of dwellings
Number of houses to provide from 2010 – 2031 (based on ration of 0.9 x 10480 jobs)	9,432
Housing commitments	891
Remaining Local Plan housing allocations	1,813
Total housing supply	2,704
Residual number of dwellings to provide 2010 – 2031	6,728
Allowances for housing windfalls from 2021-2031	960
Sum of dwellings to plan for/ allocate	**5,768**

C: Create 9720 jobs up to 2031

	No of dwellings
Number of houses to provide from 2010 – 2031 (based on ration of 0.9 x 9720 jobs)	8,748
Housing commitments	891
Remaining Local Plan housing allocations	1,813
Total housing supply	2,704
Residual number of dwellings to provide 2010 – 2031	6,044
Allowances for housing windfalls from 2021-2031	960
Sum of dwellings to plan for/ allocate	**5,084**

Main features/ outline of the advantages and disadvantages of Scenario 1:

- Higher to significantly higher numbers of new homes would need to be provided than the current rate of delivery, and for the significantly higher numbers this could have an adverse impact on character of towns and villages and the environment (ranging from 347 per annum to 449 per annum)
- Developing significant numbers of houses in villages could lead to a significant increase in traffic in some rural areas depending on which job numbers are considered
- Infrastructure constraints and appropriate phasing will have to be carefully considered as significant development could place significant pressure on the provision of additional infrastructure and on the viability for smaller developments if spread throughout the district to meet housing numbers.
- This scenario would mean releasing a significant amount of Greenfield land for housing development and this would lead to a loss of countryside and it could have a high environmental impact depending on which job numbers are considered
- The scale of the growth is such that it would allow the opportunity to consider more strategic sites and this will have additional advantages such as being able to plan for comprehensive developments
- This scenario would not enable us to meet affordable housing needs in the district fully
- This option could potentially meet housing needs across the district depending on the job numbers considered
- Housing land availability for high housing numbers have not been tested

- Housing growth and employment growth will be balanced

Scenario 2: Address affordable housing needs and market housing needs

1.40 Affordable housing is an important issue for many people, and was a clear priority for many respondents to the Core Strategy Issues and Options document last year. The delivery of affordable housing is also identified as a key national planning objective (PPS1 and PPS3) and local priority within Babergh. The Council has a good track record in affordable housing delivery and has used a variety of effective approaches to deliver affordable housing in the past, however income in relation to house prices continues to mean that affordability in the district remains a problem, as emphasised in the most recent local assessments.

1.41 There is still a substantial need for affordable housing in the district and it is expected to remain as such for the Plan period. The annual scale of affordable need in the district is almost three times the predicted average annual delivery of new affordable homes. One way to address this need would be to increase delivery of market housing which in turn would increase delivery of affordable housing through planning obligations, particularly as there is limited scope and funding to deliver rural affordable housing schemes.

1.42 This scenario determines the housing growth to plan for based on Babergh's affordable housing needs and the percentage of affordable housing delivered in Babergh in recent years as part of the total housing delivery in the district. Housing research completed for the Ipswich Housing Market Area (this includes the Babergh area) considered that in Babergh there is a net annual affordable housing need of 193 units. In comparison in the recent past (between 2004 and 2009/10) on average 29% of the total housing delivery in Babergh was affordable housing. Therefore to provide for the affordable housing needs of the district based on these assumptions we would have to plan for 670 new dwellings per annum.

1.43 The table below sets out the position on housing requirements for Scenario 2, past housing and affordable housing delivery and existing land supply, relying upon data collected for the most recent AMR for 2009/10.

	No of dwellings
Dwellings already provided 2001-2009/10	2,393
Total annual net affordable housing need per annum	193
Total housing need per annum (based on affordable housing required of 193 and past affordable housing delivery of 29% of the total housing delivery)	670
Number of dwellings to provide 2010 – 2031 (670 x 21 years)	14,070
Housing commitments	891
Remaining Local Plan housing allocations	1,813
Total housing commitments and housing allocations (897+1821)	2,704

Residual number of dwellings to provide 2010 – 2031	11,366
Allowances for housing windfalls from 2021-2031	960
Sum of dwellings to plan for/ allocate	**10,406**

Main features/ outline of the advantages and disadvantages of Scenario 2:

- Significantly higher numbers will be provided than the current rate of delivery and this could impact on the character of towns and villages and the environment (670 per annum)
- Developing significant numbers of houses in villages could lead to a significant increase in traffic in some rural areas depending on which targets are considered
- Infrastructure constraints and appropriate phasing will have to be carefully considered as significant development could place significant pressure on the provision of additional infrastructure and on viability for particularly smaller developments if these are spread throughout the district to meet housing numbers
- This scenario would mean releasing Greenfield land for housing development particularly the higher numbers would mean releasing a significant amount of greenfield land and this could lead to a loss of countryside and could have a high environmental impact
- This scenario particularly the higher end of the numbers would need a significant number of allocations to provide for these numbers
- The scale of the growth is such that it would allow the opportunity to consider more strategic sites and this will have additional advantages such as being able to plan for comprehensive developments
- Housing numbers would be much higher than employment targets and housing and employment would not be balanced in the district
- This scenario would enable us to meet affordable housing needs in the district
- This option would meet housing needs across the district and probably exceed them
- Housing land availability for such high housing numbers have not been tested

Scenario 3: Depressed market and continuing the existing level of development

1.44 This scenario is essentially based on having regard to the economic recession that we have experienced and a depressed market that would impact on housing delivery initially (assuming that this would impact on delivery for the next three years). The assumption in this scenario is that once the market has recovered past levels of development in the district would continue (looking at average rates of completion between 2001 and 2009/10).

1.45 It is clear from annual monitoring that there has been a significant fall in the number of completions from 2008-09 to 2009-10 (35%) in the Babergh District, and that the effects of the market recession are starting to impact on annual housing delivery figures. Using evidence from quarterly starts and completions from the first quarter of 2009 and comparing this to the first quarter of 2010 it can be seen that both numbers of starts and completions are higher for 2010 than what it was for 2009. However there is some anecdotal evidence suggesting that a higher supply in the market, difficulties

to obtain mortgages, cuts in public spending and uncertainty in markets could lead to a fall in house prices.

1.46 Based on this information the possible impact of the recession on completions in the Babergh District has been estimated by assuming that completions in 2010/11, 2011/12 and 2012/2013 would be 35%, 30% and 20% respectively lower than the average rate of past completions (between 2001 and 2009/10).

1.47 The table below sets out the position on housing requirements for Scenario 3 including showing past delivery rates and existing land supply (relying upon data collected for the most recent AMR for 2009/10 that will be published in due course).

	No of dwellings
Number of dwellings already provided 2001- 2009/10	2,393
Annual number of dwellings provided for 2001-2009/10 (2393/ 9 years)	276
Number of dwellings to be provided with initially depressed market for 3 years (179+193+221)	593
Number of dwellings to be provided with continuation of existing rate of delivery once market recovered for 18 years (276 x 18 years)	4,968
Total number of dwellings to provide 2010 – 2031 (1100 + 4416)	5,561
Existing housing commitments	891
Remaining Local Plan housing allocations	1,813
Total housing commitments and housing allocations (897+1821)	2,704
Residual dwellings to provide 2010 – 2031 (5516-2718)	2,857
Allowances for housing windfalls from 2021-2031 (96*10 years)	960
Sum of dwellings to plan for/ allocate (new allocations)	**1,897**

Main features/ outline pros and cons of Scenario 3:

- Lower numbers will be provided than the existing level of growth in the district (265 per annum).
- It is unlikely that major issues would impact in terms of infrastructure as this was already tested as part of the Regional Spatial Strategy examination process.
- This scenario could mean that some infrastructure may be less viable with lower numbers of dwellings still required to 'fund' infrastructure. Viability would need to be researched further, but we believe that the scale of the numbers under this scenario is not so significantly different to previous options that were considered to anticipate major differences
- This scenario would mean that Greenfield sites will have to be released although less Greenfield sites would have to be released than if higher numbers were considered
- This could mean potentially looking for less sites but the scale of the growth is still of such that it would allow the opportunity to consider

more strategic sites and this will have additional advantages such as being able to plan for comprehensive developments
- This scenario would not enable us to meet affordable housing needs in the district fully.
- Housing numbers would be lower than job targets.
- This scenario would potentially not meet housing needs across the district
- Housing land availability for lower housing numbers have been tested
- This scenario takes account of the market recession and past rates of delivery

Scenario 4: Market intervention/ quick market recovery and continuation of existing level of development

1.48 This approach focuses on the continuation of past levels of development in the district and it is assumed that there will either be a quick recovery of the market and/ or market intervention which would lead to a quick recovery of markets thereafter allowing for growth. The assumption used to calculate the housing figures for this scenario is that the average rate of housing completions in the district (from 2001 to 2010) would continue until 2031.

1.49 As mentioned earlier in the report housing delivery in Babergh is closely monitored, and from 2000/01 to 2009/10 an average total of 276 dwellings (net) were completed per annum in the district. This figure was used to calculate housing requirements for the scenario up to 2031.

1.50 The table below sets out the position on housing requirements for Scenario 4, including figures for past delivery and existing land supply (relying upon data collected for the most recent AMR for 2009/10 to be published in due course).

	No of dwellings
Dwellings already provided 2001-2009/10	2,393
Number of dwellings to provide with continuation of existing rate of delivery 2010 -2031 (276 x 21 years)	5,796
Housing commitments	891
Remaining Local Plan housing allocations	1,813
Total housing commitments and housing allocations (897+1821)	2,704
Residual number of dwellings to provide 2010 – 2031	3,092
Allowances for housing windfalls from 2021-2031 (96*10 years)	960
Sum of dwellings to plan for/ allocate	**2,132**

Main features/outline of the advantages and disadvantages of Scenario 4:

- Continuation of existing rate of development in the district (276 per annum).
- Not likely that major issues would impact in terms of infrastructure as this was already tested as part of the Regional Spatial Strategy examination process.
- This scenario would mean that Greenfield sites will have to be released although less Greenfield sites would have to be released than if higher numbers were considered.
- This could mean potentially looking for less sites but the scale of the growth is still of such that would still allow the opportunity to consider more strategic

sites and this will have additional advantages such as being able to plan for comprehensive developments

- This scenario would not enable us to meet affordable housing needs in the district fully.
- Housing numbers would be lower than job targets
- This scenario would potentially not meet housing needs across the district
- Housing land availability for lower housing numbers have been tested
- This scenario takes account of the market recession and past rates of delivery

1.51 The four scenarios show a range of annual average housing growth from 1,897 (scenario 3) to 10, 406 (scenario 2). The following table summarises the four scenarios:

Table 1.3: Summary of housing scenarios

Scenario	Annual average target (rounded)	Housing numbers to plan for 2010-2031 (incl. commitments and Local Plan Allocations)	Housing numbers to plan for 2010-2031 (excl. commitments and Local Plan Allocations)
1: Balancing housing and economic growth			
1A	347	7,290	3,626
1B	449	9,432	5,758
1C	417	8,748	5,084
2: Address affordable housing needs and market housing needs	670	14,070	10,406
3: Depressed market and continuing the existing level of development	265	5,561	1,897
4: Market intervention/ quick market recovery and continuation of existing level of development	276	5,796	2,132

Q: Please state your preference(s) on the scenarios ranking them from 1 to 6 (this allows for scenarios 1A, 1B, and 1C to be scored individually), with 1 for your greatest preference and 6 for your least favoured approach. Please give reasons for your choices.

Q: Are there any other scenarios/approaches that you consider would be preferable, as well as viable, realistic and deliverable (beyond minor variations of the scenarios set out above)?

2. Employment growth in Babergh – determining the scale of growth in employment, town centres and tourism

Introduction

2.1 Babergh is an economically diverse area, with industrial areas at the Ipswich fringe, Sudbury, Hadleigh and Brantham; traditional retail sectors in the two towns; a high proportion of small businesses; and tourism and leisure based around the historic villages of Long Melford, Lavenham, Kersey, and the Orwell and Stour estuaries and the scenic "Constable Country". There is a significant agricultural base, and historically, Babergh has had a relatively high proportion of manufacturing employment.

National Policy Context

2.2 Planning Policy Statements set out the government's planning policies, and following the change in government they are currently being revised. PPS4: Planning for Sustainable Economic Growth was published in December 2009 and sets out objectives for prosperous economies and encompasses policies for economic growth in urban areas, town centres and rural areas. "Economic development" includes public and community uses and main town centre uses, and the term now also applies to other development which achieves either the provision of employment opportunities; generates wealth; or produces or generates an economic output or product. This wider definition recognises the value to the economy of non-B Class enterprises, including, for example, education, and tourism/hospitality/catering, which are particularly important in Babergh.

2.3 As well as support for business generally, national policy requires Councils to identify a range of sites to facilitate a broad range of economic development, including mixed use sites. Key distribution networks should be protected and promoted. Town centres are important to the local economy and need to be protected and enhanced. National policy continues to support economic development in rural areas through re-use of redundant buildings and farm diversification, and seeks to ensure sufficient shops and facilities are available in rural areas to serve people's day-to-day needs.

2.4 The former RSS set sub-regional targets for growth in jobs over the plan period to 2021 and required local authorities to plan for a supply of land for businesses across the region, plan strategic sites, plan for clusters of businesses, and plan for strong and vibrant town centres. The indicative jobs growth target for Babergh district in the March 2010 draft revised RSS was 9,700, with a note that apportionment for the Ipswich Policy Area will be determined by Babergh, Ipswich, Mid Suffolk and Suffolk Coastal Councils.

2.5 Whilst the RSS has been revoked it is worth noting the draft policies applicable in the Haven Gateway sub-region as this is a locally derived area based on the economic profile. A policy for Strategic Employment Sites set out criteria for the designation of Regional Strategic Sites, Regional Gateway Sites, and Sub-Regional Sites. The latter would have been identified within sub-regions, and the policy makes provision for additional Regional Strategic Sites, Regional Gateway Sites and Sub-Regional Sites to be identified in LDDs. A number of locations where additional provision should be considered was identified to support key sectors, including support for

financial and business services in Ipswich, and support for the creative industries in the Haven Gateway.

The Haven Gateway

2.6 The Haven Gateway is a sub-region that had formerly been recognised as a growth point. It has been further divided into Suffolk and Essex Haven Gateway. Suffolk Haven Gateway (SHG) comprises Ipswich Borough and Babergh and Suffolk Coastal Districts and is based on Ipswich and the Port of Felixstowe. Both of these are important economic drivers of economic development and employment in Babergh.

Local Context

2.7 Babergh's economy has a higher level of industrial activities than average for the Suffolk Haven Gateway (SHG) sub-region, and a good proportion of office employment in Sudbury. The district also has a high number of small industrial units in the rural area. However, even though employment levels in the B Use Classes[8] is relatively strong in Babergh, it should be noted that the highest numbers of employees are in non-B Use Classes jobs, and the forecast is that this will continue to be the case in the future.

2.8 Economic activity rates in Babergh are noticeably higher than national or regional levels, and unemployment levels are lower. The District compares favourably with the wider region in terms of level of highly qualified inhabitants, but is still below the national average. In terms of weekly earnings Babergh is considerably below county, regional and national levels. In 2001 Babergh had the largest proportion of out-commuting out of all Suffolk's districts with 43% of its employed population working outside of the district.

2.9 The attractive landscape, estuaries, and coastline, and the historic towns and villages in the district form the base of an important cultural and historic leisure and tourism sector. Businesses in this sector are important contributors to the local economy and include leisure activities that attract spending all year round from people within the district and the immediate area, to the more conventional tourism associated with people visiting from outside the region on day trips, taking short breaks, and longer summer holidays.

<u>Town and Village Centres</u>

2.10 Sudbury, Hadleigh and the larger villages provide the shops and services that residents need for their day to day needs (convenience shopping). Sudbury is the hub of a wide rural area and provides a good range of non-food shops (comparison shopping), services and leisure activities. A recent study[9] has confirmed that Sudbury is generally performing well in retail and economic terms. Even during the recession the amount of vacant shop floorspace is low. There is strong potential for the number and range of shops in Sudbury

[8] The Town and Country Planning (Use Classes) Order 1987 (as amended). Class B1 Business (including offices and light industrial); Class B2 General Industrial; Class B8 Storage and distribution. (Note: there are no Classes B3 – B7).
[9] Babergh District Retail Study Colliers CRE July 2008

to expand, “but an existing shortage of suitable sized units/floorspace is holding the town back”.

2.11 Hadleigh town centre “offers consumers an attractive shopping environment and, for a centre of its size, a good diversity of uses”. The number of vacant shops is low, and the small independent shops are an important attraction. There is relatively little potential for Hadleigh to add to its comparison goods shopping beyond a new supermarket - a site for which was identified in the Local Plan. An application has been submitted for this, and is currently under consideration by the Council.

2.12 Some of the larger villages – the Key Service Centres listed in section 2 - such as Long Melford, Bildeston, Bures, East Bergholt, Holbrook, Capel St Mary, Shotley and Lavenham provide local shops, services and community facilities. Many of these villages also attract visitors and tourists and provide employment in specialist shops, pubs, hotels and restaurants. This additional ‘layer’ of economic activity undoubtedly contributes to the vitality and viability of these villages.

The Evidence

2.13 The Council has commissioned studies and monitored and measured employment floorspace and the health of the town centres over many years. More recently, the district has benefited from membership of the Haven Gateway Partnership in terms of jointly commissioned research. The SHG Employment Land Review and Strategic Sites Study (ELR) were carried out for Ipswich, Suffolk Coastal and Babergh in 2009 and have provided a comprehensive picture of the local economy.

2.14 The Babergh District Retail Study (Colliers CRE) and Sudbury and Hadleigh Health Checks (all published July 2008) give us valuable up-to-date information about our towns, and statistics are available that indicate the importance of leisure and tourism to the local economy.

Employment growth – developing a strategy for the future

2.15 Based on the evidence we need to recognise the drivers of our local economy and our existing strengths, and identify the potential for future new businesses and employment opportunities to help achieve the new jobs target. The evidence shows two main growth poles for Babergh, the Ipswich Fringe/east Babergh area including Brantham, and the western growth pole of Sudbury and outlying satellites of Glemsford, Acton, Long Melford, Great Waldingfield, and Bures St Mary.

2.16 Between the two growth poles lies Hadleigh, which is part of the Ipswich ‘travel to work area’ but is also significant in its own right as an employment base for the town, and as an important local town centre.

2.17 The strategy for sustainable economic development through the plan period should reflect the economic geography of the district so that the strengths of each area are recognised and encouraged, existing sites protected and new sites allocated.

2.18 In terms of our strengths, we have identified the following sectors:

- Non-B Use Class employment – including public sector jobs such as teaching, health and welfare;
- Port and logistics
- Information and Communications Technology;
- Manufacturing – reflecting the historical advantage/local tradition
- Tourism and related leisure/hospitality service sector
- Rural/agricultural/diversification – including farm shops and farmers markets.

2.19 Opportunities for jobs in these sectors can be encouraged and promoted:

  - by protecting existing and allocating new sites in the district in locations that meet the needs of the local economy;
  - by creating sustainable new mixed use developments; and
  - through flexible policies in the plan that support non-B Use Class employment in the tourism/culture/ leisure/hospitality sectors and new ways of working, particularly home working.

2.20 The Employment Land Review identifies a surplus of employment land in quantitative terms, however it notes that not all sites are available and/or of suitable quality to meet the district's need for a range of employment sites in the short to medium term. We will need to allocate strategic employment sites in Babergh as we recognise that business activity doesn't follow local authority boundaries, and that some of the employment areas in Babergh are important outside the district because of their location. In addition, Ipswich borough area is geographically constrained, and within Suffolk local authorities have traditionally considered the wider Ipswich Policy Area (Ipswich fringe in Babergh, Mid Suffolk and Suffolk Coastal districts) in planning for jobs and homes.

2.21 The Council will continue to work with our neighbouring authorities to consider the most appropriate distribution for new employment development in the Ipswich fringe and Suffolk Haven Gateway areas, taking into account the views of local communities, the needs of businesses, land availability, environmental constraints, and a sustainable relationship with the parts of the Ipswich fringe proposed for housing growth.

2.22 Given the existing local economic background we have identified the following three areas as locations where new employment opportunities could potentially be created and how this might be achieved:

<u>Sudbury/ Great Cornard , Western Babergh</u> – protection of existing and delivery of new allocations in Sudbury/Great Cornard and Chilton, and the satellite Key Service Centres of Glemsford, Acton, Long Melford, Waldingfield and Bures. There is no evidence to support further allocations beyond these in this area at this stage.

<u>Ipswich Fringe East Babergh including Shotley peninsula</u> – allocation of sub-regional and local strategic sites, and protection of existing allocations that are partly developed or undeveloped. Because of the sub-regional significance of the Babergh Ipswich fringe area (Haven Gateway – and in particular proximity to the Port of Felixstowe) there may be a need to consider additional employment sites in this area, including as part of mixed-use developments.

Hadleigh / Mid Babergh- although this is part of the Ipswich 'travel-to-work area' existing employment areas make a significant and important contribution to employment in the town and surrounding rural area. Protection of existing employment areas, and re-allocation of undeveloped employment areas within mixed-use developments will be important in this area, together with recognition of the importance of non-B Use Class jobs to the local economy.

2.23 Clearly not all the sites that may be identified in these three areas would be available or required straightaway, and we have therefore set out below a table indicating an approach to phasing possible allocations that may come forward. In any event, the final outcome should be sufficiently flexible to deliver the overall strategy across the district and through the plan period through the 'Plan – Monitor – Manage' process.

Possible Phasing of Potential Strategic Sites/Allocations

Location	Plan Period Phases 2011 – 2031		
	Early	Mid	Late
Sudbury/western Babergh Chilton – re-allocation	√		
Ipswich Fringe – east Babergh/ Shotley peninsula Brantham (Local Strategic Site)	√		
IP8/Sprites Lane (Local Strategic Site)	√	√	
Former Sugar Factory, Sproughton (Sub-Regional Strategic Site)			√
Hadleigh- Mid Babergh Mixed-use - re-allocation	√	√	

Jobs Growth Target for Babergh District

2.24 As part of a new twenty year planning strategy we need to establish what our jobs growth aspirations for Babergh district will be. In doing so we should build on our strengths and recognise weaknesses. We should also consider as part of this that the figure will inevitably reflect the reality of our location in an economic area that is heavily influenced by the proximity of the Port of Felixstowe and a range of business and commercial activity in Ipswich, and to a lesser extent Colchester and Bury St Edmunds, and recognise the need to work with our neighbouring local authorities particularly in the Ipswich Policy Area to promote and focus economic growth.

2.25 Babergh is well placed to play its part in planning for a growth in jobs in the Haven Gateway sub region. The former RSS Policy E1 set a target of 30,000 for the Suffolk Haven Gateway area (2001 to 2021). Current predictions indicate a shortfall in achieving this target.

2.26 To put the employment figures in context, in 2001 Babergh had 22% of jobs in the SHG area. The forecast for 2021 is that there would be a 35.4% growth in jobs representing 24% of jobs in the sub-region.

2.27 There are a number of issues for Babergh to consider in determining a figure for growth in jobs in the plan period 2011 to 2031:

- where the jobs are now – recognise that these are largely the same locations are where housing growth is likely to take place;
- Babergh has high levels of out-commuting – we need to create more jobs within the district to help reduce this level;
- where the jobs could be - locations for employment opportunities have been identified at strategic sites such as Brantham, Sproughton and the Ipswich Fringe;
- recognise the need to make provision for new employment land and premises within the larger, strategic growth areas/allocations
- we need to continue to work with our neighbours to plan for business needs across administrative boundaries, and to realistically to help to accommodate constrained growth from Ipswich;
- Babergh encourages business and enterprise and will continue to support the creation of new jobs in all sectors in the district.

2.28 The following scenarios could be the basis for further consideration:

Scenario 1 – the "business as usual" approach – based on the EEFM[10] 2009 baseline scenario we assume the growth figures for the 20 period 2011 to 2031 will be the same as the former RSS 20 period 2001 to 2021. The ELR suggested percentage share of the new jobs for Babergh is 24% of the total ('shortfall') forecast figure of 22,860. This would give us a jobs growth figure of **8,100**.

Scenario 2 – to use the ELR 'shortfall' forecast figure for Babergh of 8,100 and add one-third of the number that would have been necessary to achieve the former RSS target (assuming a three-way split between Babergh, Ipswich and Suffolk Coastal of the shortfall). This would give a figure of **10,480**.

Scenario 3 – to use the shortfall forecast to 2021 of 8,100 and apply the same percentage growth to the jobs target for the district to 2031 as has been used in the former RSS (2001 – 2021) for the growth in new houses i.e. 20%. This would give a figure of **9,720**.

Scenario 4 – determine a jobs growth target after the housing growth target has been chosen on a 1:1 ratio of jobs to new households.

[Note: Although it had no status, and with the revocation o f the RSS by the Sectary of State in July this year it is no longer relevant, the Draft East of England Plan > 2031 published in March 2010 set out in revised Policy E1 a jobs target of 9,700 for Babergh district.]

2.29 Whilst all three scenarios are based on the adopted RSS target for the SHG area, it should be acknowledged that we are more than half way through the original 20 year timeframe. The Haven Gateway jobs growth figures were

[10] EEFM – East of England Forecasting Model produced by the East of England Development Agency

acknowledged by the Secretary of State in her Proposed Changes to the Draft RSS and Statement of Reasons in December 2006, to be "bottom up" assessments based on studies by the Haven Gateway Partnership that informed the draft RSS and accepted the recommended figures for the Haven Gateway area.

2.30 The Haven Gateway (former RSS) figures have also formed the basis of Employment Land Reviews (ELRs) and studies that have been carried out in the SHG and other Suffolk authorities. The ELRs have been carried out to a consistent template, and have included extensive consultation with local employers. We also have our own monitoring information, and data from 'Choose Suffolk' (formerly the Suffolk Development Agency) and the Haven Gateway Partnership, which over the past ten years has informed choices, policy formulation, and decision making, and created a common basis for cross-authority working in the area of economic development.

Q: Recognising that Babergh is part of an economic sub region, and that local administrative boundaries are meaningless to many businesses, should Babergh aim to accommodate a proportion of the Haven Gateway sub-regional jobs growth target? If so, should this include an allowance to help achieve the identified shortfall?

Q: Please state your preference(s) on the jobs growth scenarios ranking them from 1 to 4, with 1 for your greatest preference and 4 for your least favoured approach. Please give reasons for your choices.

Q: Are there any other scenarios/approaches that you consider would be preferable, as well as realistic and deliverable (and beyond minor variations of the scenarios set out above)? Please give the reasoning behind/evidence for your alternative scenario.

Town centres, village services and the rural economy

2.31 Economic development and employment growth includes the retail sector, public and community services, and tourism, and a wide range of economic activity in the rural economy from agricultural diversification enterprises to new energy technology design and development.

2.32 Sudbury and Hadleigh, are the two principal town centres within the district, and as such should remain the main focus for retail, leisure and community uses in the district. The Council intends to continue to promote a healthy mix of uses and range of shops and services in the towns to ensure that these centres are active, vibrant and well used.

2.33 It is important that new development is well designed and contributes positively to the local character of the towns. The Council will work with partners to promote investment in and enhancement of these centres and opportunities will be explored to conserve heritage assets, recognising that historic buildings and the traditional character and appearance of town and village centres are well-loved local assets and the focus for tourism, leisure and economic development with the potential to be a catalyst for regeneration, and make improvements to the public realm.

2.34 Sudbury and Hadleigh town centres are supported by a network of smaller local and villages centres. All of the larger villages identified as Key Service Centres in section 2 above provide for most of the day-to-day needs of local communities. Some of these villages provide a wide range of shops, leisure, and service and community facilities to the surrounding rural area.

2.35 Although smaller villages may only provide one or two local services or facilities these are essential to the continued well-being and sustainability of these settlements. The Council believes that in all villages facilities and services such as shops, post offices, pubs, petrol stations, community halls etc that provide for the needs of local communities should be safeguarded, and new uses that are appropriate in scale and character and supported by the local community should be encouraged in the larger villages. Development that will contribute to the local economy and increase the sustainability of villages and that is supported by the local community will be supported by the district council.

2.36 Historic villages such as Lavenham and Long Melford, and coastal villages such as Chelmondiston and Shotley, play an important role in tourism and leisure within the district, and appropriate new development supported by the local community will be encouraged.

2.37 Babergh will continue to support the economy in the rural area through the encouragement of proposals that are supported by the local community for farm diversification, the re-use of redundant rural buildings, tourism and leisure based businesses, the protection of small rural businesses and, where appropriate, farm shops and farmers markets.

3. Where should the growth go? - A settlement hierarchy for Babergh, and Potential Broad Locations for Growth

Introduction

3.1 The previous section considered the rural nature of Babergh district, and suggests a functional economic division into three areas. The main towns/urban areas are clear within each third, and the network of larger villages that meet the day to day needs of the local rural community can begin to be identified. In order to consider levels of housing and economic growth and development in the district over a twenty year period it is useful to examine this more closely.

3.2 Responses to the Issues and Options report last year indicated minimal support for a new settlement and equitable dispersion of growth in the district. The 'urban concentration' option had just under 40% stating this as a first preference, with the rural development option reaching nearly 50% as a first preference. The business as usual option had just 30% indicating this as a first preference (but this rises to almost 60% when second preferences are included). Other issues raised included the view that key service centres should be identified; support for some development within and around sustainable villages; impacts of the spatial strategy on the surrounding area and on the historic and natural environment should be considered; impacts on climate change should steer development; and brownfield land should be used first.

Key service centres and other villages

3.3 Whilst the 2001 Suffolk Structure Plan has been superseded and has no status, it is useful to refer to the county strategy for growth. The following are extracts from policy CS3:

CS3(a) *Most housing development will be located in or adjoining towns, at a scale consistent with the potential for sustainable development at each town.*

CS3(e) *Other towns and villages with potential for housing development primarily meeting the needs of their surrounding area will be identified in local plans. At these settlements, new housing may be located within or, where indicated in the local plan, adjoining the built-up area. Settlements identified for new housing under this policy should have all of the following:*

i) primary school;
ii) good journey to work public transport service to a town;
iii) convenience goods shop;
iv) community, leisure and social facilities; and
v) a variety of employment opportunities which have potential for further development.

3.4 The former Regional Spatial Strategy (RSS - Policy SS4) superseded the Structure Plan, and this indicated that development in rural areas was to be

focussed on Market Towns and outside these areas in 'Key Service Centres'. These were suggested in the RSS as villages with a good level of services, including;

- A Primary School within the village , a secondary school within it, or easily accessible by public transport;
- Primary Health care facilities
- Range of retail and service provision capable of meeting day to day needs, particularly for convenience shopping;
- Local employment opportunities and
- Frequent public transport to higher order settlements.

3.5 In 2010 in Babergh district we can see that the context has changed since the Structure Plan policy was developed. Some villages may have lost their convenience goods shop (and/or post office) since 2001, and/or their pub. Whilst we consider the RSS set too high a benchmark for key service centres in this part of rural Suffolk, for example provision of primary health care facilities in villages in Babergh district would be an exception, not the norm, and public transport to higher order settlements can scarcely be described as "frequent". We have therefore used these criteria only as a basis for identifying key service centres in Babergh, and have adapted them in view of the dispersed settlement pattern.

3.6 Other criteria are considered relevant to defining a hierarchy for settlements in Babergh including the following:

Population size: Some larger villages in the district have a strong function in supporting the rural hinterland beyond, including many smaller villages, particularly on the Shotley Peninsula and the north west of the district. Although not particularly large places themselves, they support a number of services which are largely able to be sustained by the population of the settlement and surrounding area (plus visitors). Settlements serving such a function tend to show a relationship to the population size, for this reason we consider that settlements with a population of 1000 or should be considered for inclusion as key service centres.

Alternatively, a higher population threshold could be applied. However, if 2000+ were used it would leave some areas of the district remote from a Key Service Centre, which could lead to an unsustainable approach, as a much more limited rate of development may lead to a decline of services in some of the larger settlements. For example, if a population of 2000 were used as the threshold for Key Service Centres, it would exclude Acton, Bildeston, Boxford, Bures St Mary, Chelmondiston, Great Waldringfield, Lavenham and Nayland. Indeed, most of these would also be excluded if the threshold were set at 1500. This would make some rural areas, in particular in the mid Babergh area, remote from a Key Service Centre, which through appropriate growth, may be able to sustain a reasonable level of service provision which is important to the settlements and the rural hinterland beyond them.

Exception: The only exception to the criteria and above method of assessment is Bures St Mary due to its unique circumstances. With the River Stour forming the administrative boundary with Braintree District and Bures Hamlet the settlement functions as one large village and together provides all

5 of the key services, including a railway station. The combined population is well over 1000

Location / function: Due to the geography of the rural parts of the district, many smaller villages are remote from key centres such as Sudbury, Hadleigh or Ipswich. Although the urban areas within and beyond the district provide most opportunities for jobs, shopping and other services, the larger settlements in between these centres have an important role to play, providing closer access to many of the essential services. It is important that key service centres are located within reasonable reach of the smaller villages and the rural hinterland in all areas of the district. The pattern of distribution, based on the criteria described below (i.e., 4 of the key facilities listed plus a population of 1000 or more), would ensure that all areas are well related to a key service centre.

3.7 The Babergh district council Village Services and Facilities assessment 2009 illustrates a fairly dispersed pattern of distribution of some of the key services, particularly health facilities. A larger settlement may lack one of the five key services/criteria listed in paragraphs 3.3 and 3.4 above, but due to its size, location, accessibility, or availability of other services it has an important role in serving many of the day-to-day needs of its population and that of the rural hinterland beyond.

3.8 We therefore suggest that key service centres in Babergh are villages with a population of more than 1,000 and that have four or more of the five key services listed in paragraph 3.4 above:

Key Service Centres

- **Acton**
- **Bildeston**
- **Boxford**
- **Brantham**
- **Bures St Mary***
- **Capel St Mary**
- **Chelmondiston**
- **East Bergholt**
- **Glemsford**
- **Great Waldingfield**
- **Holbrook**
- **Lavenham**
- **Long Melford**
- **Nayland**

3.8 It is important to recognise that smaller villages, although dependant on a key service centre or town for many services, need to be able to accommodate small-scale housing growth to meet local needs, and particularly affordable housing. Within our local area, to have a policy that prevents all further development in these smaller villages could make them vulnerable to further loss of facilities and decline. We have therefore also considered the size and spatial characteristics of the smaller villages and looked at the key services and facilities that meet some of people's day-to-day needs. We consider these to be good public transport links to the towns and/or key service

centres, a primary school and a food shop. Such services help to make a village sustainable, and are the services that are often under threat when a population or user-group declines.

3.9 These smaller villages which are not Key Service Centres, but retain the settlement development boundary (referred to in the Local Plan as Built Up Area Boundary BAUB) and have two or more of the following key criteria could appropriately be identified as **Other Villages** suitable for small-scale development to meet local needs:

- **Assington**
- **Bentley**
- **Cockfield**
- **Copdock and Washbrook**
- **Elmsett**
- **Hartest**
- **Hintlesham**
- **Hitcham**
- **Kersey**
- **Lawshall**
- **Monks Eleigh**
- **Polstead**
- **Stoke By Nayland**
- **Sproughton**
- **Stratford St Mary**
- **Stutton**
- **Tattingstone**

3.8 In contrast, small villages and hamlets which have no services, or which have poor transport links are unsustainable locations for additional development, even on a small scale, unless there is good reason for new development to be located in the countryside. The Local Plan identifies some of these less sustainable villages, but still defines them with a settlement development boundary. It would be consistent with a new settlement pattern and hierarchy if settlements in the countryside that are not either Key Service Centres or Other Villages were to have no defined settlement development boundaries. They would therefore be considered to be in the countryside. In these areas development would be restricted and any development permitted will require exceptional justification.

3.9 However, in order to meet local housing needs and maximise the delivery of affordable housing it is considered that the current Local Plan policy on affordable housing exception sites should continue for sites that are in or immediately adjacent to Other Villages and in or adjacent to settlements without a development boundary at a scale proportionate to proven local needs.

Q. Do you agree with the suggested settlement hierarchy set out above? If not how would you change this and why?

Q. Do you think that the population threshold of 1000, for defining key service centres is appropriate for the make up of the district? If not please indicate what you consider to be appropriate and why.

Q. Do you agree with the Babergh criteria for key service centres? If not how would you change this and why?

Q. Do you agree with the Other Village category and the criteria for defining these villages? If not how would you change this and why?

Q. Do you agree that smaller settlements that do not meet the criteria for either Key Service Centres or Other Villages should be considered to be in the countryside without settlement development boundaries? If not how would you change this and why?

Phasing and Brownfield Land Use

3.10 It is important that we use brownfield land rather than greenfield land wherever it is appropriate and sustainable to do so. Nationally, it is a priority for new housing to be built on brownfield land, and the Council considers that it should apply equally to all development including new employment or commercial and other forms of development. Unsurprisingly urban districts in the region, such as Ipswich, have traditionally achieved much higher levels of development on brownfield land than rural districts where targets have been and will be more challenging.

3.11 The prioritisation of brownfield land for housing development has caused some problematic issues in the Babergh district, as it has led to significant pressure to redevelop the district's scarce employment land supply for residential redevelopment. The prioritisation of brownfield land does not remove the need to consider the retention of an adequate supply of employment land and premises to ensure that settlements can remain sustainable.

3.12 Between 2004 and 2009 the percentage of housing completed on brownfield land in the District was 59% (average). The percentage of housing completions on brownfield land reduced from 68% in 2005 to 55% in 2009. The figure is similar for employment development, for example during the 2008-09 monitoring year 59% of all employment completions were on brownfield land. However Babergh is a rural district with limited brownfield land supply. A number of brownfield housing allocations are now completed or nearly completed and limited brownfield allocations remain. When considering an appropriate target in the local Babergh context the Strategic Housing Land Availability Assessment provides an indication of potential available brownfield land for housing within the district. This study shows that of the total housing requirement up to 2027, a total of 30% can potentially be delivered on brownfield land.

3.13 Consideration was given in the Issues and Options report to the most appropriate targets for brownfield land use in the district and applying these targets to all development. Most of the responses received indicated that a high priority should be attached to the use of brownfield land before greenfield land where appropriate. Most support was for local evidence/ circumstances to inform brownfield targets and with some support also for a brownfield target of 60%.

Potential Broad Locations for Growth

3.10 Delivery of a realistic scale of district-wide housing growth within the existing settlement pattern in Babergh makes it likely that there will be a need for urban extensions. We know that there is insufficient land available within the existing town boundaries and there is considerable pressure on what brownfield land there is in the district. Although some former employment land may be more suitable for residential development we need to recognise that we need to facilitate economic recovery and growth and ensure that employment land is available through the plan period.

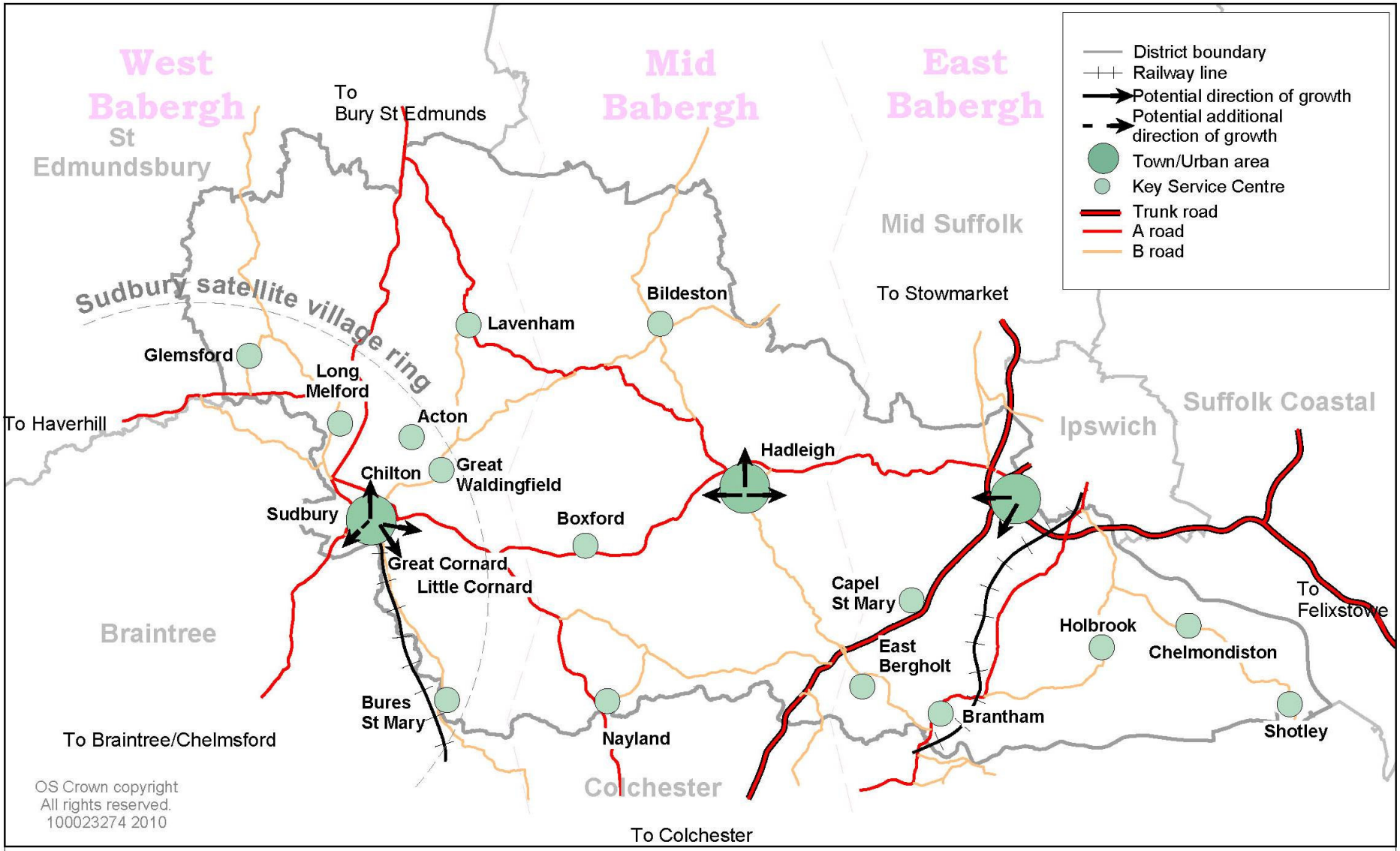
3.11 The positive advantages of having properly planned comprehensive sustainable developments in the towns/urban fringe is that there is access to jobs, services and facilities. Edge of town/urban extensions can be planned to align with the capacity of existing infrastructure, or can be planned at a scale that is sufficiently viable to include new or improved infrastructure.

3.12 If the lowest growth rate were to be divided equally across all towns and villages in the district over the plan period many small settlements would be overwhelmed putting pressure on the infrastructure, services and facilities. This would lead to an increase in commuting by car and other vehicle movements, and would stretch service provision (schools, health etc) at a time when services are being cut back.

3.13 We believe that it is more sustainable, and in the interests of the district as a whole to plan for some town-edge/urban expansion in Sudbury, Hadleigh and the Ipswich Fringe. Clearly villages will have a share of the housing growth, and the amount will depend on their individual capacity to accommodate growth and the views of the local community. It is not appropriate to identify strategic sites or broad locations for potential growth in the villages at this stage, but we have considered the constraints, advantages and disadvantages of some potential areas around the towns/urban areas and have set these out as broad locations for potential directions of growth.

3.14 It depends upon which housing growth figure is arrived at as to how many of the broad locations will ultimately be needed, and how much development each of the broad locations will be expected to accommodate. The environmental and infrastructure constraints and advantages and disadvantages of the nine broad locations for potential directions of growth are set out to provide the necessary information for further consideration and discussion.

3.15 The map shows nine broad locations for potential growth, three around Hadleigh, four around Sudbury and Great Cornard, and two on the Babergh Ipswich Fringe.



Options for Broad Locations

N

SCALE 1:200000

3.16 The precise location and phasing of new development proposed for any of the broad locations that are ultimately selected, and for smaller developments in some of the larger villages will be set out in a site allocations document. The site allocations document will follow on from the Core Strategy, and as well as being based on local housing needs in each area/settlement it will be informed by detailed assessments of a range of criteria including:

- Flood risk
- Nature conservation constraints/designated areas and implications of an Appropriate Assessment under the habitats directive (where appropriate)
- Landscape considerations and designated sites (e.g. AONB)
- Historic character and conservation considerations
- Infrastructure constraints – physical infrastructure/utilities
- Infrastructure needs (e.g. transport, open space, leisure facilities) and access to services and facilities
- Availability of brownfield land, and
- A sustainability appraisal.

3.17 We include here a brief summary of the advantages and disadvantages of the nine broad locations for potential growth that we have identified. A fuller summary based on the findings of an initial sustainability appraisal undertaken for the Council by Atkins (June 2010), and informed by the preliminary Habitats Regulations Assessment and other evidence is included as Appendix x.

(Note: the sustainability 'traffic light' scores below are those used by Atkins and set out in the Sustainability Appraisal Methodology section of the report.)

Hadleigh

Broad Location 1:

Constraints: includes Grade 3 agricultural land; archaeological finds in the area; Tree Preservation Order in the broad area; public rights of way in the area.

Development of sites within this broad location would lead to the loss of greenfield agricultural land. It is situated in proximity to a SSSI and LNR, and is near an Area of Archaeological Importance and a Special Landscape Area and is situated in relative proximity to a Conservation Area.

However, development in this broad location would be within 2km of the town centre, 1 km of the high school, and 2km of a doctors' surgery, and would therefore benefit from the services and facilities offered within Hadleigh, also it is in close proximity to public transport routes and public rights of way.

The broad location is not at flood risk.

Mixed use development should help minimise the need for travel.

Sustainability Appraisal: This broad location has the highest green score of the 3 broad locations in Hadleigh:

	3	In conflict with the criterion
	4	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified
	28	In conformity with the criterion
	3	Not relevant to criterion / Neutral effects

Broad Location 2:

Constraints: within Special Landscape Area; Grade 3 agricultural land; large archaeological site and other small finds in the area; Biodiversity Action Plan/Protected species in the area; Local Nature Reserves and County Wildlife Sites in the area; Public Rights of Way; Tree Preservation Orders; Listed Buildings and Conservation Area in close proximity.

Development of sites within this broad location would lead to the loss of greenfield agricultural land. The areas close to the River Brett are within Flood Zones 2 and 3. Development within the broad location may affect the quality of groundwater. Toppesfield Bridge is a Scheduled Ancient Monument.

However, development in this broad location would be within 1km of the town centre, 1-2 km of the high school, and 1km of a doctors' surgery, and would therefore benefit from the services and facilities offered within Hadleigh, also it is in close proximity to public transport routes and public rights of way.

The broad location would accommodate a mixed use development offering good accessibility to local facilities.

Sustainability Appraisal: Broad location 2 has the highest red score of the 3 Hadleigh broad locations.

	5	In conflict with the criterion
	4	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified
	27	In conformity with the criterion
	2	Not relevant to criterion / Neutral effects

Broad Location 3:

Constraints: Some of the broad location is within Special Landscape Area; mostly Grade 3, some Grade 2 agricultural land; archaeological sites in the area; flood Zone 3 along the river; Public Rights of Way.

Development of sites within this broad location would lead to the loss of greenfield agricultural land. The River Brett is partially located within Flood Zones 2 and 3. Development in this broad location may affect the quality of groundwater as it is located within groundwater source protection zones 2 and 3 (Outer Zone and Total Catchment Zone). Parts of the broad location are located in proximity of a SSSI and Local Nature Reserve, and close to Hadleigh Conservaton Area.

However, development in this broad location would be 1km or more of the town centre, and 1 - 2 km of the high school and doctors' surgery, and would therefore benefit from the services and facilities offered within Hadleigh, as well as having the advantage of being located close to Public Rights of Way and public transport route.

Development within this broad location may also provide opportunities for remediation of potentially contaminated sites.

The broad location would accommodate a mixed use development, offering good accessibility to local facilities.

Sustainability Appraisal: second highest green score and lowest red score of the 3 Hadleigh broad locations.

	1	In conflict with the criterion
	9	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified
	26	In conformity with the criterion
	2	Not relevant to criterion / Neutral effects

Sudbury/Great Cornard

Broad Location 4:

Constraints: The broad location is within the Special Landscape Area; it is Grade 3, agricultural land; archaeological sites in the area; close to Sudbury Conservation Area; potentially contaminated land (part of area); partially lies within Flood Zones 2 and 3; close to Grade II* Ballingdon Hall.

The development of sites within this broad location may result in the loss of some greenfield agricultural land and public open space. However, it may also offer opportunities for remediation of potentially contaminated sites. It also may lead to coalescence of the urban extension with Middleton. Sites allocated within this broad location would benefit from the services offered within Sudbury and would have the advantage of proximity to Public Rights of Way and public transport route with bus stops located within the location. The broad location would accommodate a mixed use development, offering good accessibility to local facilities. The broad location partially lies within Flood Zones 2 and 3. Development within this location may affect the quality of groundwater, as it is located within a groundwater source protection zone 2 (Outer Zone).

Mostly within 1km of town centre and some key services. Uplands Middle School approximately 2km from the Broad Location.

Any development to the south and west of the town centre is likely to impact on the approach and town centre road network and produce severe environmental impacts on the river/meadows. The one way system is a barrier to cyclists. Would need to consider how any existing/potential cycle routes from any new development to major attractors could be improved. Need to link any new development with the town and rail station. There are air quality and on street parking issues along Cross Street. The leisure centre, rail station and shops are all accessed off Eastern Road which can cause safety and congestion problems.

Sustainability Appraisal: highest number of amber and lowest number of green scores of the four Sudbury broad locations in the summary of assessment results.

	2	In conflict with the criterion
	12	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified
	22	In conformity with the criterion
	2	Not relevant to criterion / Neutral effects

Broad Location 5:

Constraints: Mostly Grade 2 and small part Grade 3 agricultural land. One SAM is adjacent to the broad location.

The development of sites within the broad location would result in the loss of greenfield agricultural land. However, sites allocated within this broad location would benefit from the services offered within Sudbury and have the advantage of being located in close proximity to Public Rights of Way and public transport route, with the nearest bus stop being adjacent to the location boundary. The broad location would accommodate a mixed use development, offering good accessibility to local facilities. Development of the area may affect the quality of groundwater, as it is located within a groundwater source protection zone 2 (Outer Zone) and adjacent to an Inner Zone.

Broad location 5 is within 2km of the town centre. All services are within 2-3km, and a supermarket, middle and high school are all within 1km of the area.

The one way system is a barrier to cyclists. Would need to consider how any existing/potential cycle routes from any new development to major attractors could be improved. Need to link any new development with the town and rail station. Plans exist to refurbish cycle-footbridges which cross Springlands Way. Possibility of removing two of these to reduce bridge maintenance costs and to replace them with toucan crossings. However, this would require steps to be provided and therefore is unlikely. Broad locations 5 and 6 to the east and north east are able to use the A134 Springlands Way to bypass the town centre.

Sustainability Appraisal: Broad location 5 scores the highest number of greens and the lowest number of ambers (Score: 2 red, 4 amber, 29 green, 3 n/a). the 2 red scores are for greenfield land, and best and most versatile agricultural land (Grade 3).

	2	In conflict with the criterion
	4	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified
	29	In conformity with the criterion
	3	Not relevant to criterion / Neutral effects

Broad Location 6:

Constraints: Mostly Grade 3 – small area of Grade 2 agricultural land; Archaeological sites; BAP/Protected species (edges of area); Public rights of way. Relative proximity of Edwardstone Woods SSSI (within 4km) and adjacent to a Historic Park and Garden.

The development of sites within this broad location would result in the loss of some greenfield agricultural land and possibly public open space. It may also lead to coalescence of the urban extension with Great Waldingfield. However, the sites within the broad location would benefit from the services offered within Sudbury and have the advantage of being located in close proximity to Public Rights of Way and public transport route, with the nearest bus stop located within the broad location area. The broad location would accommodate a mixed use development, offering good accessibility to local facilities. Development within the broad location may affect the quality of groundwater, as it is located within a groundwater source protection zones 2 and 3 (Outer Zone and Total Catchment Zone).

Broad location 6 is within 2+ km of the town centre. Doctors' surgery within 1km; middle and high schools within 2km and supermarket 3km of area.

The one way system is a barrier to cyclists. Would need to consider how any existing/potential cycle routes from any new development to major attractors could be improved. Need to link any new development with the town and rail station. Broad locations 5 and 6 to the east and north east are able to use the A134 Springlands Way to bypass the town centre. Broad locations 6 and 7 to the east and south of Sudbury involve the development of spine roads, either through the potential housing development, or using existing roads on the eastern edge of the existing built up area. Thus these broad locations have the potential to deliver some relief to the town centre gyratory.

Sustainability Appraisal: Broad location 6 has no red scores, the second highest number of amber scores and second highest number of green.

	0	In conflict with the criterion
	11	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified
	26	In conformity with the criterion
	1	Not relevant to criterion / Neutral effects

Broad Location 7:

Constraints: Special Landscape Area; Grade 3 agricultural land; Public rights of way; BAP/protected species in proximity; Listed buildings in proximity; proximity to Cornard Mere SSSI and Abbas Hall Wood. Mitigation measures may need to be incorporated into site design and development to avoid potential effects on ecological and heritage assets and their settings.

The development of sites within this broad location would result in the loss of some greenfield agricultural land and possibly public open space. The sites with this location would benefit from the services offered within Sudbury and have the advantage of good accessibility to Public Rights of Way and public transport route with bus stops within the location. The broad location would accommodate a mixed use development, offering good accessibility to local facilities. The development within the broad location may affect the quality of groundwater, as it is located within a groundwater source protection zone 1 and 2 (Inner Zone and Outer Zone).

Broad location within 5km of town centre; middle and high school within 1km, and Doctors' surgery within 2km.

The one way system is a barrier to cyclists. Would need to consider how any existing/potential cycle routes from any new development to major attractors could be improved. Need to link any new development with the town and rail station. Broad locations 6 and 7 to the east and south of Sudbury involve the development of spine roads, either through the potential housing development, or using existing roads on the eastern edge of the existing built up area. Thus these broad locations have the potential to deliver some relief to the town centre gyratory.

Sustainability Appraisal: Broad location 7 has the second lowest green score of the four Sudbury/Great Cornard broad locations.

	2	In conflict with the criterion
	9	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified
	24	In conformity with the criterion
	3	Not relevant to criterion / Neutral effects

Ipswich Fringe

Broad Location 8:

Constraints: SLA; majority of area Grade 2 agricultural land, some Grade 3; Public Rights of Way; Stour and Orwell Estuary designated SPA located approximately 2.8km south-east of the broad location and the Stoke Tunnel SSSI is located approximately 2km to the east; proximity to an Historic Park and Garden.

The broad location is situated in Ipswich Fringe. Development of sites within it would result in the loss of some greenfield agricultural land and possibly some public open space. However, the sites within this location would benefit from the services offered within Ipswich and have the advantage of being located in close proximity to Public Rights of Way and public transport route with bus stops located within the location area. The broad location would accommodate a mixed use development, offering good accessibility to local facilities.

The quality of groundwater may be affected as the broad location is located within a groundwater source protection zone 2 (Outer Zone). The Habitats Regulations Assessment (HRA) Preliminary Review indicated that the broad location may support roosting and foraging birds of the European site and, therefore, development may have a detrimental impact to the ecological function of this designation.

Supermarkets and Doctors' Surgery within 1km of area, and High School within 2km of area. Park and Ride site nearby. The Suffolk Centre 6th form college (opens September 2010) is close to the area. New walking and cycling routes are proposed as part of the Suffolk Centre development. This would provide a link for pedestrians and cyclists between Sproughton and the Centre, as well as a link to the countryside. Would need to consider how any existing/potential cycle routes from any new developments to major attractors could be improved. Good level of bus services along Hadleigh Road – few along London Road. A14 is noisy and would have serious impacts on any new housing nearby unless major mitigation was provided. Highways Agency likely to be concerned because of the A14 and Copdock interchange.

Sustainability Appraisal: Only one red score – location in proximity to a SPA, SAC or broad location of SSSI.

	1	In conflict with the criterion
	9	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified
	26	In conformity with the criterion
	2	Not relevant to criterion / Neutral effects

Broad Location 9:

Constraints: Overhead power lines; BAP & Protected species; Grade 3 agricultural land; small area of Grade 2 agricultural land; in proximity to SSSIs, an SPA, a CWS, a LNR, and an AW. It is also adjacent to Areas of Archaeological Importance and it is situated adjacent to a grade II listed building.

The broad location abuts Ipswich settlement boundary. Development of sites within it would lead to the loss of greenfield agricultural land. The location is also at risk of flooding and is within a ground water protection zone. A County Wildlife Site lies within the location and it has a Green Corridor running through it. On the positive side this broad location benefits from the services and facilities offered within Ipswich and it has the advantage of being located adjacent to public transport routes and Public Rights of Way. Proposed mixed use development should help minimise the need for travel.

Supermarket, Doctors' Surgery and High School all within 1km of area. Park and Ride site nearby. The Suffolk Centre 6th form college (opens September 2010) is close to the area. New walking and cycling routes are proposed as part of the Suffolk Centre development. This would provide a link for pedestrians and cyclists between Sproughton and the Centre, as well as a link to the countryside. Would need to consider how any existing/potential cycle routes from any new developments to major attractors could be improved. A14 is noisy and would have serious impacts on any new housing nearby unless major mitigation was provided. Highways Agency likely to be concerned because of the A14 and Copdock interchange.

Sustainability Appraisal:

	5	In conflict with the criterion
	5	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified
	25	In conformity with the criterion
	3	Not relevant to criterion / Neutral effects

Q: Do you agree that we should plan for urban extensions to accommodate new housing and jobs? If not, please give your reasons and suggest an alternative strategy.

Q: Hadleigh - would you prefer to see growth spread out in all three broad locations for potential growth, or all growth concentrated in one or two locations? Please give your reasons, and any alternative to the four locations considered above.

Q: Sudbury and Great Cornard – would you prefer to see growth spread out in all four broad locations for potential growth, or all growth concentrated in one or two locations? Please give your reasons, and any alternative to the four locations considered above.

Q: Ipswich Fringe - would you prefer to see growth spread between both broad locations for potential growth, or all growth concentrated in one location? Please give your reasons, and any alternative to the four locations considered above.

Q: Are there any of the nine broad locations for potential growth that you consider should not be developed at all? If so, please let us know which these are, and why you consider they should not be developed.

Q: Are there any broad areas around the towns and/or on the Ipswich Fringe that we have not looked at that you feel would be better locations for future housing and employment growth? If so, please let us know the reasons why, and identify any possible constraints.

Appendix B

Housing and Jobs comparisons for Suffolk and Haven Gateway up to 2021

Housing

Area/ District	Housing Requirements for 2001 to 2021 (RSS)		Housing Delivery April 2001- March 2009	
	Figures 2001 – 2021	Figures per Annum 2001-2021	Figures 2001 – 2009	Figures per Annum
Babergh	5,600	280	2,208	276
Ipswich	15,400	770	6,225	778
Suffolk Coastal	10,200	510	5,093	637
Mid Suffolk	8,300	415	3,579	447
St. Edmundsbury	10,000	500	3,388	424
Forest Heath	6,400	320	1,935	242
Waveney	5,800	290	2,932	367
Suffolk	**61,700**	**3,085**	**25,360**	**3,170**
Haven Gateway	**65,100**	**3,255**	**28,797**	**3,600**
Tendring	8,500	425	3,523	440
Colchester	17,100	855	8169	1021
Braintree	7,700	385	4988	624

Jobs

Area/ District	Job Requirements for 2001 to 2021 (RSS)		Job Creation 2001-2009		
	Figures 2001 – 2021	Figures per Annum	Number of Jobs in 2001	Figures 2001 -2009	Figures per Annum
Babergh	*	(Share of 1,500)	36,200	3,700	463
Ipswich	*	(Share of 1,500)	73,900	100	13
Suffolk Coastal	*	(Share of 1,500)	54,100	4,900	613
"Suffolk Haven"	**30,000**	**1,500**	**164,200**	**8,700**	**1,088**
Mid Suffolk	**	(Share of 900)	43,800	-1,500	-188
St. Edmundsbury	**	(Share of 900)	57,100	3,000	375
Forest Heath	**	(Share of 900)	29,000	-1,400	-175
"Rest of Suffolk"	**18,000**	**900**	**129,900**	**100**	**13**
Waveney	5,000	250	47,200	200	25
Suffolk	**53,000**	**2,650**	**341,400**	**8,900**	**1,113**
Haven Gateway	**50,000**	**2,500**	**333,000**	**19,400**	**2,425**
Tendring	20,000	1000	42,400	4,600	575
Colchester			82,600	7,600	950
Braintree	56,000***	2800***	55,000	7,500	938

* Share of "Suffolk Haven" figure of: **30,000**

** Share of "Rest of Suffolk" figure of: **18,000**

******* Includes figures for Braintree/ Brentwood/ Chelmsford/ Epping Forest/ Harlow/ Maldon/ Uttlesford

(East of England Plan 2008)

Sources:

- East of England Plan (2008);
- St. Edmundsbury, Forest Heath, Waveney Annual Monitoring Reports (2008/09);
- Haven Gateway - V5 Haven Gateway Trajectory revised 14 May 2010 (Excel doc);
- East of England Forecasting Model Spring 2009 - Local area forecasts_LA employment aspirations_forecast (Excel doc)