

Babergh Local Plan / Local
Development Framework
**Annual Monitoring Report
2004/05**



December 2005

Contents

Contextual Indicators	Page 2
Outline Facts about Babergh District, Issues, Challenges and Opportunities	Page 2
Core Output Indicators Summary Table	Page 6 - 7
Future Monitoring Plans	Page 7
LDS Implementation	Page 8
Commentary on the Babergh Local Plan Alteration No. 1	Page 12
Commentary on the Babergh Local Plan Alteration No. 2 Second Deposit Draft <i>(This section contains: the objectives of the Local Plan chapters, policies not being implemented (reg 48 (4) – (5) refer), detailed commentary on Core Output Indicators and analysis of policy performance and effects.)</i>	Page 12
Commentary on the Suffolk Structure Plan 2001	Page 31
Local Development Orders (N / A)	Page 31
Appendices	
Appendix 1: LDS Implementation – Detailed Schedule	Page 32
Illustrative Material	
Figure 1: Map of Babergh District	Page 3
Figure 2: Housing Trajectory	Page 17

Babergh District Council

Babergh Local Plan / Local Development

Framework

Annual Monitoring Report 2004-05

NB: The period covered by this AMR is 01 April 2004 - 31 March 2005

Contextual Indicators

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

Geography and Demographics

Babergh District had a population of 84,630 in 2003 according to Suffolk County Council estimates and a geographical area of 596 square kilometres.

The district is predominantly rural, but there are two main towns: Sudbury and Hadleigh. The largest town is Sudbury with a population of 12,040 (2003 Suffolk County Council estimates) adjacent is Great Cornard (normally counted with Sudbury) having a population of 8,020 (2003 Suffolk County Council estimate). Sudbury and Great Cornard are the main settlements in the district and they are identified as the locations for substantial housing growth. The second largest town is Hadleigh, with a population of 7,840 (2003

Suffolk County Council estimate). Parts of the urban areas of Ipswich extend into the district on its eastern fringe (the urban parish of Pinewood had a population of 4,013 as of the 2001 Census).

The district also contains a wealth of attractive villages, historic buildings and countryside. Much of the countryside is of high landscape value, with two Areas of Outstanding Natural Beauty and a number of Special Landscape Areas, there are also 29 conservation areas and approximately 4,000 listed buildings within the district.

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

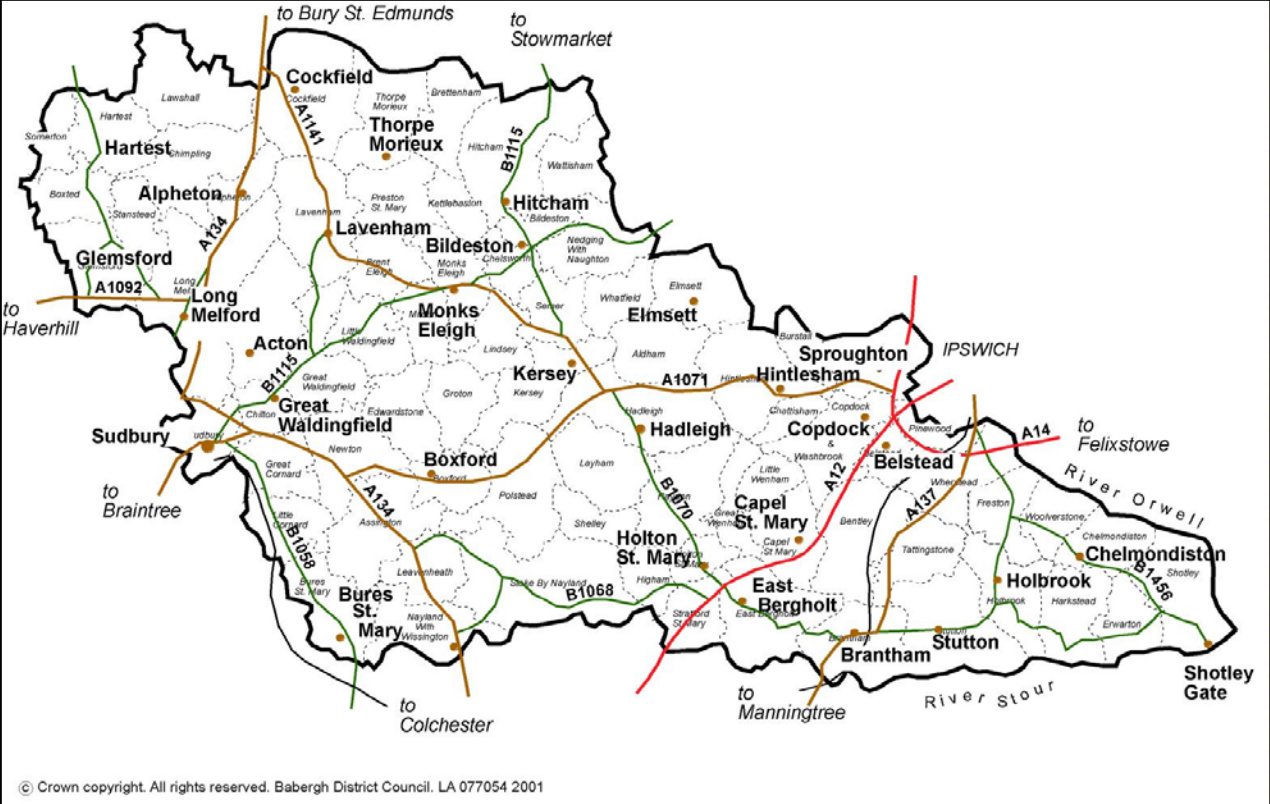


Figure 1: Map of Babergh District

Issues

- The district has a low crime rate and represents an attractive ‘rustic idyll’ for people living and working in London.
- This has attracted outward migration from London by wealthy commuters.
- House prices are high and the problem of affordability has increased in the district.
- There is also pressure on the countryside for change of use of land to housing, equine-related uses and extensions to gardens.

- Agriculture continues to be under financial pressure and has subsequently diversified in many cases; leading to a variety of uses for redundant farm buildings and new uses for farmland where farmers are trying to increase their income.
- Pressures on the planning system to develop brownfield sites for housing and the desire of commercial organisations to maximise capital receipts has meant that employment land has come under pressure for re-development as housing.
- There is now a shortage of employment land in the district.
- Any well-designed and built new commercial developments in good locations let or sell very quickly.
- The district is also attractive for tourists and maximising the economic benefit to the district while trying to minimise the adverse impact is challenging.
- Certain parts of the district are particularly dependent on one employer, which may cause concern.

Challenges

Housing

- Ensure that annual completions meet the Structure Plan requirements as recent completions have been well below this target.
- Achieving the required proportion of affordable housing and an appropriate housing mix (of varying types and sizes) particularly when the total number of completions is declining.

Economy

- Ensuring businesses are in up-to-date premises while retaining employment land and ensuring that vacant and unoccupied premises are reoccupied as quickly as possible.
- The core retail frontages in town centres are under constant pressure from non-retail uses.
- In Hadleigh there is a quantitative need for a new supermarket and accommodating this scale of modern development in an historic town without harming its character is an important development issue.

Countryside

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

Sustainable Communities

- Reducing dependence on the car and using sustainable means of construction.
- Retaining facilities in villages is also difficult as changes of use from a village facility to residential use are often commercially more attractive.
- With the large number of listed buildings and Conservation Areas maintaining and safeguarding the historic environment is a substantial challenge for the district.

Development Issues

- The Chilton Mixed Use proposal presents planning, implementation / delivery issues for the district, in terms of housing, access, design, infrastructure, landscape impact and the scale of development to name a few.
- There are still some previously developed and under-utilised areas of land that are suitable for development within the district, and ensuring that these are developed appropriately is a concern.
- There are major areas either allocated for housing or with planning consent for housing that need to be developed within the Local Plan period.
- Market conditions for housing development are also very changeable, which creates problems for new development and delivery.

Opportunities

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

Summary of the Core Output Indicators by Key Policy Themes

Theme	No.	Data Required	Data Supplied
Business Development	1a	Amount of floorspace developed for employment by type.	B1 (a) – 473 B1 (b) -0 B1 (c) – 1509 B2 - 128 B8 -0
	1b	Amount of floorspace developed for employment by type, in development or regeneration areas.	B1 (a) -0 B1 (b) -0 B1 (c) – 1364 B2 – 68 B8 -0
	1c	Amount of floorspace by employment type, which is on previously developed land.	B1 (a) -0 B1 (b) -0 B1 (c) -0 B2 – 68 B8 -0
	1d	Employment land available by type.	No data.
	1e	Losses of employment land in: i. employment areas and; ii. in local authority area.	None in the monitoring period.
	1f	Amount of employment land lost to residential development.	0.45 Hectares
Housing	2a(i)	Net additional dwellings over the previous five year period or since start of relevant DPD period, whichever is the longer.	1196
	(ii)	Net additional dwellings for the current year.	187
	(iii)	Projected net additional dwellings up to the end of the relevant DPD period, or over 10-year period from its adoption, whichever is the longer.	4285
	(iv)	Annual net additional dwelling requirement;	345
	(v)	Annual average number of net additional dwellings needed to meet overall housing requirements, having regard to last year's performance.	389.5
	2b	Percentage of new and converted dwellings on previously developed land.	Year ending: 2001 – 55% 2002 – 57% 2003 – 39% 2004 – 55% 2005 – 43%
	2c(i)	Percentage of new dwellings completed at: less than 30 dwellings per hectare;	12%
	(ii)	Between 30 and 50 dwellings per hectare; and	42%
	(iii)	Above 50 dwellings per hectare.	48%
	2d	Affordable housing completions.	71

Transport	3a	Amount of completed non-residential development within UCOs A, B and D complying with car-parking standards set out in the LDF.	All non-residential developments comply with the parking standards set out in the development plan and these are applied across the whole of Suffolk.
	3b	Amount of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre.	This is not currently monitored.
Local Services	4a	Amount of completed retail, office and leisure development; and	Retail – 1060m2 Office – 473m2 Leisure – No completions
	4b	Amount of completed retail, office and leisure development in town centres.	Retail – 1060m2 Office – No completions Leisure – No completions
	4c	Amount of eligible open spaces managed to green flag award standard.	None.
Minerals and Waste	5a, 5b, 6a & 6b	For minerals and waste planning authorities only.	N/A
Flood Protection and Water Quality	7	Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.	No applications were approved contrary to advice from the Environment Agency.
Biodiversity	8(i)	Change in areas and populations of biodiversity importance, including change in priority habitats and species (by type); and	No info yet, it is hoped the County Council will appoint an officer to monitor this issue in the future.
	(ii)	Change in areas designated for their intrinsic environmental value including sites of international, national, regional, subregional or local significance.	No changes in the areas designated for their intrinsic environmental value.
Renewable Energy	9	Renewable energy capacity installed, by type.	Solar: 23kw (max at full sun). Geothermal: 4kw. Aerothermal: 3kw.

Review and Plans regarding Progress in Future Monitoring

Effective and comprehensive monitoring systems have been lacking in Babergh Council for a considerable time. However, it is recognised that the new planning system, to operate effectively under the plan, monitor, manage principles, will rely upon the development of effective monitoring systems. However, this situation is changing already. Firstly, the Council has invested in procuring an electronic planning application records

system with a dedicated monitoring module. This allows the creation of reports purpose-designed for particular monitoring tasks. An information backfilling exercise to catch up with previous years monitoring information was carried out in late 2003 and this proved highly valuable in providing information to inform the Babergh Local Plan Inquiry in 2004 – 5. Monitoring information returns for the regional spatial strategy AMR have been much more complete in 2004 and 2005. In 2005, for the first time, staff have been specifically assigned to ongoing monitoring work covering both planning permissions and completions across both residential and employment / commercial developments. Four key work areas have been identified and prioritised to form a co-ordinated action plan, as follows:

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

These areas of work will enable the Planning Policy team and others within the Council to deliver more comprehensive AMRs for the Local Plan and LDF in future years.

Implementation of the Local Development Scheme

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

Background

The Council adopted the first Local Development Scheme (LDS) for Babergh in February 2005, without a need for the Government Office to direct the Council to change it fundamentally. This covered the first almost five-year period from early 2005 to late 2009. However, in the light of various comments from the Government Office (GO East), the

scheme was amended and re-issued in August 2005, to incorporate some revisions that GO East considered necessary. There was effectively no overlap between the periods covered by the LDS and this AMR, with dates in the main LDS timetable commencing from April 2005. Clearly then, no documents within the LDS were scheduled to be finalised within the period covered by this annual monitoring report (2004-5). However, it is useful to analyse at this point progress on implementation of the LDS up to late 2005.

Babergh Local Plan Alteration No. 2

The Babergh Local Plan (Alteration No. 2) is listed in the LDS. This will be a saved document and was taken through a Public Inquiry, completed just after the end of this monitoring period. As of late 2005, the Inspector's report has been received (in November) and responded to already, with proposed Post Inquiry Modifications being agreed by Babergh's Strategy Committee and full Council by mid December, ready for public consultation in early 2006. The deadline for adoption is mid July 2005 and a programme has been prepared carefully to meet this vital deadline.

Statement of Community Involvement

Some early scoping work was carried out on Babergh's Statement of Community Involvement (SCI) during the monitoring report period. This included a thorough review of best practice in production of SCIs by other local authorities around the country, some of which had already progressed to a relatively advanced stage. Following preliminary work by a neighbouring local authority with similar circumstances to Babergh, a decision was taken to align Babergh's SCI with that of Suffolk Coastal district (as far as possible), with a view to a joint examination, should a formal examination prove necessary.

As of late 2005, the Council has gone through the initial regulation 25 consultation on the SCI. It has subsequently produced a draft SCI document and completed the 6-week public consultation period necessary under regulation 26. It proved very difficult to meet all of the initial consultation period dates, these dates having originally been set consecutively, with no period to carry out work in-between them. Consequently some programme slippage occurred. However, later in 2005 good progress was made and it is intended to speed up the work on subsequent stages and thereby allow for a meeting of the final dates, for examination and adoption later in 2006.

Sustainability Appraisal / Strategic Environmental Assessment

A considerable amount of work has also been undertaken in 2004 and 2005 working jointly with other Suffolk local planning authorities on the baseline data and initial scoping

report for the Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) of the Local Development Framework (LDF). This work will place Babergh in a strong position from which to progress individual scoping and subsequent reports for the various LDF documents to be produced. With most baseline data now gathered, it is not necessary to progress further actual scoping report production yet (with an overall draft already in place), since no new LDF documents are programmed for commencement of preparation until later in 2006.

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

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

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

Work on these documents is scheduled to commence in June 2006 and April / May 2007 respectively. These in turn will be influenced by:

- progress on adoption of the Local Plan (deadline July 2006)
- adoption of the Regional Spatial Strategy (due late 2006)
- and by staff resources available to the Planning Policy team (the exact extent of which is subject to some current uncertainty, as of late 2005)

The next Annual Monitoring Report will be able to provide a valuable update on all these issues. The need for a comprehensive evidence base to inform and underpin the new LDF is already under consideration. However, in the meantime, the team's officers are mindful of the need to secure an appropriate level of skilled staff resources to deliver the future LDS programme, which will be difficult. Officers are also mindful of the need to be realistic about these resources in relation to delivery dates and the need to review LDS progress regularly (see section below). Accordingly, a bid for increased staff resources (both temporary to July 2006 and for permanent staff beyond this period) is currently under consideration. In addition, opportunities for joint working between Suffolk districts and the county council and even possibly some sharing of staff resources are being explored. Other ways of bringing in further staff resources (such as students working temporarily) will also be explored and considered. In addition, the upskilling of existing staff to create greater capacity for planning work is underway.

Revisions to the LDS

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

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

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

Clearly, commencing production of the other two SPDs to produce draft documents in February – March 2006, whilst taking the local Plan towards adoption and consulting on Post Inquiry Modifications at exactly the same time, would not be feasible for a team of the Planning Policy team's size. Commencement of work on the other two SPDs should therefore be postponed until the Local Plan is adopted (for which there is a deadline of mid July 2006). The production period can remain the same, so proposed completion would become scheduled for March 2007.

Commentary on the Babergh Local Plan Alteration No. 1

June 1995

This Plan, along with the Suffolk Structure Plan 2001 still forms part of the Development Plan for the district, however it is not considered in detail in this monitoring report as policies and proposals within it were analysed and reviewed during the Local Plan review

process. The Babergh Local Plan Alteration No 2 is an evolution of this Plan and many policies are similar but take into account more up to date guidance.

Both sets of policies are used when giving advice and making decisions. Policies in Alteration No 1 are used particularly when newer policies are not backed at appeals against refusals of planning permission. The focus of this AMR is the Alteration No 2, which we have taken to Public Inquiry with the intention of adopting it. At the request of the Government Office and to ensure that as much as possible can be learnt from the use of this plan's policies, more detailed analysis of the most used policies will be undertaken in next year's AMR.

Commentary on the Babergh Local Plan Alteration No. 2

Second Deposit Draft May 2003

Chapter 1 Introduction

This chapter has only one policy LP01 relating to Planning Obligations, which is being implemented when applicable.

Chapter 2 Environment

The objectives of Chapter 2 are:-

1. To encourage sustainable patterns of development.
2. To ensure that water quality and water resources of the District are protected.
3. To protect people and property from flooding hazardous installations and contaminated land.
4. To encourage the saving of energy and the use of alternative and renewable energy resources.
5. To facilitate and promote a sustainable approach towards waste management.
6. To protect the environment from light pollution.
7. To protect noise sensitive development from noise disturbance through development control.
8. To protect open spaces within settlements which are of value in recreational or amenity terms against development.
9. To protect and enhance the biodiversity of the District.

Policies Not Being Implemented

None.

Analysis of Policy Performance and Effects

The use of the policies in this chapter is varied with some being well used and others little used, but they are generally used when necessary. Some of the policies duplicate powers exercised by the Environment Agency and only serve as in-effect policy reminders, or grounds for refusal when necessary. It may be possible to rationalise policy EN05 (relating to flooding) and refer to a Supplementary Planning Document or solely use PPG25. Policies EN10 (sustainable drainage) and EN17 (remedial works to contaminated land) are widely used.

Policy EN25 dealing with noise and its effect on development is not considered strong enough; it may be possible to merge this with EN24 also dealing with noise.

Core Output Indicators

Flood Protection and Water Quality

The Environment Agency made adverse initial comments on 8 applications but following discussions with applicants and the Environment Agency, a satisfactory flood risk assessment was received or an appropriate planning condition was applied to a decision. At the end of the year covered by this AMR no applications were approved contrary to advice from the Environment Agency.

Biodiversity

(i) As yet we have no information on the change in priority habitats and species (by type) but it is hoped that the County Council will appoint an officer to monitor this issue in the future.

(ii) For the second biodiversity indicator there have been no changes in the areas designated for their intrinsic environmental value.

Designation	No	Area in hectares
RAMSAR:- Stour and Orwell estuaries	1	24,333
Special Protection Areas:- Stour and Orwell estuaries	1	1,261
SSSI	17	2,573

County Wildlife Site	164	1,557
Local Nature Reserve	8	137.7

Renewable Energy

The District Councils renewable energy capacity is as follows:

Renewable energy type.	Solar	Geothermal	Aerothermal
Capacity	23kw (max at full sun)	4kw	3kw

Chapter 3 Settlement Policy and Housing

The Settlement Policy and Housing Chapter is one of the most important in the Plan. The objectives of the chapter are set out on Page 57 of the Babergh Local Plan Alteration No. 2 Second Deposit Draft May 2003, these are: -

1. To meet the housing requirements of the Babergh District, including the provision of sufficient affordable and special needs housing.
2. To provide for wider housing opportunities, choice and a better mix in the size, tenure, type and location of housing and create mixed communities.
3. To provide sufficient housing land (in line with the Suffolk Structure Plan requirements) in terms of scale and location by giving priority to recycling previously developed land in urban areas; providing for a major mixed use development on the northern edging of Sudbury and an appropriate level of new housing in sustainable villages.
4. To create sustainable patterns of new housing development by locating the bulk of new housing in areas served by good public transport and are accessible to jobs, schools and community and leisure facilities.
5. To promote good design in new housing developments, including increasing densities where appropriate, to create attractive, high quality environments in which people will want to live.

Policies not being implemented

Policy HS01a relating to the Phased Release of Housing Development has been deleted from the plan in a proposed pre-inquiry change. The deletion of this policy was a result of the reduced rate of housing delivery. There has been no evidence that dwellings will be built at average rates that are above those set out in the Suffolk Structure Plan 2001. Some parts (that is, allocated sites) of Policy HS09 have been deleted from the Plan, either because they have planning consent, they have been built or they are now

considered to be unsuitable as a housing proposal. Many of the proposed sites for housing have received objections as part of the Local Plan consultation process and the Planning Inspector at the Local Plan Inquiry has now considered these objections.

Part of Policy HS17, relating to extensions to small dwellings, is not being implemented, as the Planning Inspectorate is not supporting it due to it being a draft policy. It is therefore difficult to apply this part of the policy. This policy was debated at the Local Plan Inquiry and the Inspector's report recommends deletion of the part of the policy not being implemented. This aspect sought to prevent the extension of the smallest / generally most affordable dwellings to retain them in that important element of the district's stock.

Housing Core Output Indicators

Percentage of dwellings completed at:

Less than 30 dwellings per Ha = 12%

Between 30 and 50 dwellings per Ha = 42%

Over 50 dwellings per Ha = 48%

Housing Completions (req 48 (6) & (7) refer)

<u>Years</u>	<u>Net additional dwellings</u> (Ann req. 345)	<u>Net additional dwellings – Ipswich</u> <u>Policy Area (Ann req. 55)</u>	<u>% of total new and converted</u> <u>dwellings on PDL</u>
		<i>NB These figures are included in the previous column</i>	
2000/01	232*	58*	55
2001/02	242	105	57
2002/03	510	108	39
2003/04	212	10	55
2004/05	187	0	43
Total	1,383 (req. 1,380)	281 (req. 220)	Average 49.8

**NB Structure Plan adopted 2001, so 2000-1 fig.s not part of requirement. Listed only for longer time series*

Affordable Housing Completions 2004/5

(included in the above figures)

Exception sites 52 (for rent)

'Section 106' Sites 19 (for rent)

71

There are a further 27 units in development to provide affordable housing in a mixture of tenures in the 2005/6 financial year and 178 units have been given consent.

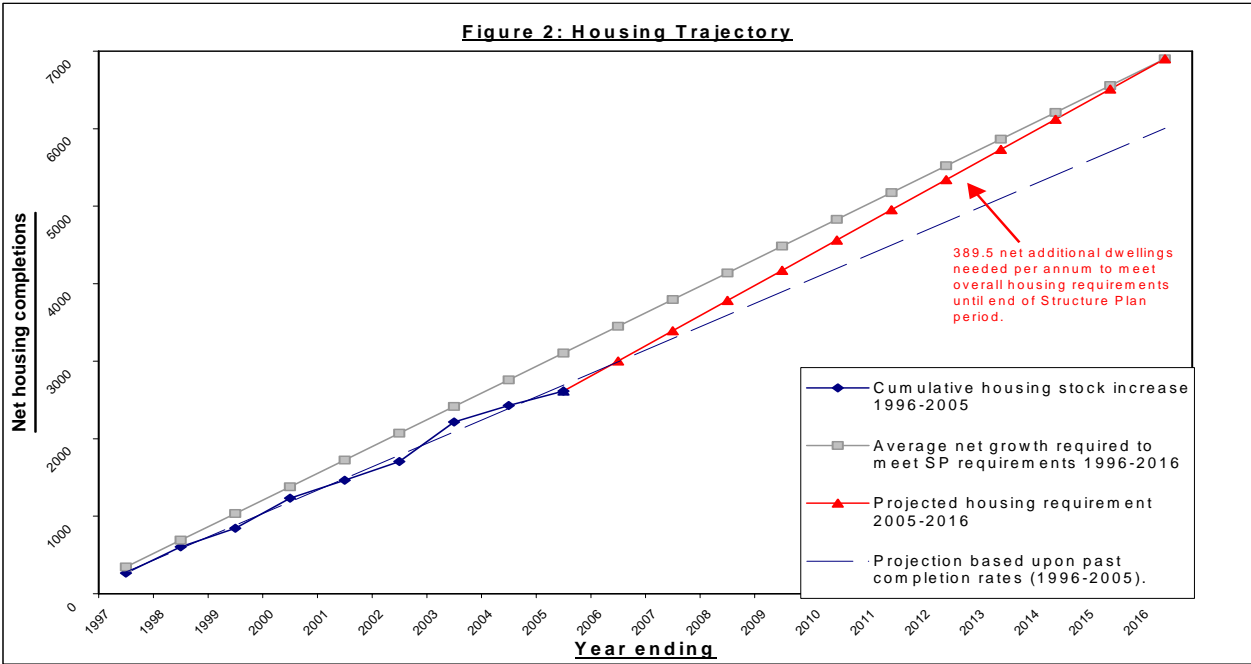
Housing Trajectory

The first point to note is that until the emerging Regional Spatial Strategy is adopted the Council has to compare its rate of housing development primarily against that set out in the Suffolk Structure Plan 2001 (Policy CS8). The Structure Plan housing allocation for Babergh was 6,900 for the period 1996 - 2016 (345 per annum). Having said this, it also needs to monitor against the development rate that may emerge through the new RSS. The Draft East of England Plan as the new RSS (replacing Regional Planning Guidance 6) sets out a figure of 5,200 for Babergh during the period 2001-2021. This then represents a decrease of 1,700 dwellings overall for the district, although clearly the level of completions between the two periods, that is 1996-2001 will be important to assess. Expressed another way, the new draft target is only 75.36% of the old figure. Two sets of monitoring record figures available cite this figure as 1,464 and 1,639 respectively, the former based on Babergh DC (Building Control) information and the latter including Suffolk CC data contained in the Structure Plan. At present it is difficult to establish which figure is the most reliable. However, if the SCC figure is more accurate, the rate required to reach the Structure Plan target of 1,725 (345 x 5) has not been achieved, with an identified shortfall of 86. However, if the lower figure is more accurate then the shortfall becomes 261. Either way there appears to have been under-provision. It will now be a priority to establish the full extent of that under-provision but it is suspected that the historical Babergh Building Control figures are probably not very reliable.

The graph at Figure 2 shows that based only on previous annual completion trends, future completions and overall stock are projected to remain in under-supply. The assumptions behind this projection need to be examined, however, past trends by themselves are not always a good indicator of what will happen in the future. Development densities may increase, for example, as a result of PPG3 and the Government's Density Direction. Housing and land markets will fluctuate and must also be considered. These are areas of further research that the Council will need to carry out and guidance on Housing Market Assessments is now available.

In Babergh there is a recent history of numerous large sites in the Sudbury / Great Cornard areas in particular, taking a very long time to achieve a full planning permission. This has frequently been associated with complex Section 106 agreements (such as the Rugby Ground site, Great Cornard and land near St Bartholomew's Priory / south of Springlands, Sudbury. Some such sites are now likely to come through the process to fruition. In addition, when the emerging Local Plan is adopted (expected to be mid 2006) without any phasing policy, a significant surge of planning applications can be expected. The smaller allocated sites in particular can be expected to be delivered relatively quickly,

where the issues delaying or stifling development can usually be expected to be less significant than on the major sites. In addition, improved ongoing monitoring will enable a fuller annual analysis of housing development against completion targets. However, it must be recognised still that the means available to local planning authorities to speed up delivery ‘on the ground’ are limited. For this reason, a dialogue will be opened up in the coming year with local landowners, developers, housebuilders and agents to explore barriers to delivery and possible solutions. In the meantime, the Council is more active than ever in the promotion of affordable housing schemes and small rural schemes in particular, with an ambitious programme of delivering 700 new affordable dwellings over the next five years.



There are new large sites allocated in the Local Plan, plus other sites and windfall sites that are expected to deliver the Structure Plan housing requirement overall. Most of these larger allocations are at the preliminary stages and as such it is not clear exactly when they will deliver the housing requirement within the Local Plan period.

Analysis of Housing Policy Performance and Effects

With pressure for housing development in all villages and towns Policy HS02 (relating to infill development in villages) has proved problematic to implement and many small villages have applications for more than three dwellings particularly where larger brownfield sites come forward for re-development. Policy HS05 deals with replacement dwellings in the countryside; the supporting text in paragraphs 3.36 (a) (b) has not been clear to some developers wishing to take advantage of a new dwelling in the countryside.

There is also a need for some guidance on replacement dwellings within settlements and outbuildings, which might at a future date be converted to dwellings. This guidance could be in the form of policies or a supplementary planning document.

Policies HS06, HS07, HS08 and HS08a dealing with affordable housing have worked well to a certain extent but perhaps need to provide greater clarity on affordable housing requirements. This will enable developers to understand what is required of them when they acquire land or submit an application. The need for affordable housing has increased substantially since the policies were drafted. As developers are required to provide a significant proportion of the cost of affordable housing and forego possible profits on full market price house sales, negotiating agreements on affordable housing is a protracted process.

Policy	Aim/Objective	Comments	Possible future action
HS06	To allow 'exception' sites to meet local needs	Policy may be complex to interpret	Consider the use of a Supplementary Planning Document
HS08	To indicate the likely range of affordable housing requirements for allocated sites.	The range seems wide and developers would like greater clarity	Consider providing updated requirements for each site
HS08a	To deliver 1 in 3 affordable houses in rural areas	Difficult to negotiate	Consider the use of a Supplementary Planning Document
HS12	To ensure that infill housing development is of a high standard and amenity is safeguarded.	The policy is widely used but what is an acceptable level of amenity space, privacy or daylight standard is not clear; what is reasonable or unreasonable needs clarification.	Consider the use of a Supplementary Planning Document or improving the supporting text. Or possibly merge the policy with HS14.
HS14	To ensure the design of new housing is of a high standard and reflects local character.	Used widely but may need some further clarification.	Consider the use of a Supplementary Planning Document or improving the supporting text. Or possibly merge the policy with HS12.

Policy HS10 is little used and may need clarification. Policy HS13 relating to residential caravans and Policy HS26 relating to travelling caravans could be merged.

Gypsy and Traveller housing and land use requirements as a Local Output Indicator*		
No.	Requirement	Data
1	Number of authorised public and private sites	None

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

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

Policy HS19 dealing with annexes generally works well, however the last part of the policy relating to section 106 agreements and developments which are contrary to housing policies has proven problematic, this form of development should be deleted from the policy.

As part of the process of producing Development Plan Documents and Supplementary Planning Documents in the Local Development Framework the operation of Policies will need to be reviewed. New policies will have to be developed in accordance with the local situation and with good practice guidelines at that time. The Council is awaiting the Planning Inspector's Report into the Local Plan Inquiry and this may result in the alteration of several policies as well as supporting text.

In overall terms, the provision of affordable housing in the numbers required is proving particularly problematic. In addition, the average annual completion rates are below those required in the Structure Plan. This has had a knock-on effect on the delivery of mixed and balanced communities. The Council considers that it proposes to allocate sufficient land in the revised Local Plan, this should not, therefore, be a constraint on housing development rates in future. Policies safeguarding the quality of the environment are generally considered effective but may require refinement through the new LDF process.

In order to meet the challenge of delivering the number of houses required by the Structure Plan, as well as delivering more affordable housing the Council is considering establishing a regular forum involving all relevant stakeholders. This would include housebuilders, developers, estate agents, as well as other departments of the Council, in order to improve delivery in these two areas by hopefully improving understanding on both sides and reducing problem areas. This should also enable the production of an agreed housing trajectory in future years.

Chapter 4 Economy and Employment

The objectives of the Economy and Employment chapter policies are:-

1. To provide opportunities for the development of the local economy, by which employment can be sustained and new jobs created.
2. To accommodate the growth requirements of the local economy by providing an adequate supply of land and buildings for all employment purposes throughout the Plan period. This needs to be based upon a robust assessment of both quantitative and qualitative need/demand.
3. To regularly monitor and review the employment policies and establish a rolling programme of land supply.
4. To continue to make the main provision for employment in Sudbury and Hadleigh and on the Southwest fringe of Ipswich.
5. To support the use of redundant and under used buildings including those in the countryside where appropriate, and to ensure that suitable sites or buildings providing employment potential are not lost through demolition or redevelopment.
6. To encourage the development of appropriate new business “clusters” allowing businesses to benefit from proximity to each other and in particular, from sharing expertise in their own type of business.
7. To facilitate and promote a range of economic initiatives, such as Haven Gateway Partnership. This initiative has strategic importance to Babergh District by virtue of

its proximity to the region's transport gateways, its ports and the economic potential of these. This aim is a key priority of the Regional Economic Strategy (RES).

Policies Not Being Implemented

None.

Business Development Core Output Indicators

Amount of floorspace developed by Use Class

Use Class	Total floorspace m ²	Total floor space in Employment Floorspace Area m ²	On Previously Developed Land, m ²
B1(a)	473	0	0
B1(b)	0	0	0
B1(c)	1509	1364	0
B2	128	68	68
B8	0	0	0

Employment land supply by type

Further information relating to employment land available and losses have not been monitored for this AMR, the Local Plan is under review and the results of the Inspectors report may affect the amount of land available. The situation will become clearer when the revised Local Plan is adopted. It is intended to have further information available for the next AMR.

Losses of employment land in (i) development areas and (ii) local authority area

No losses have been experienced within the monitoring period.

Amount of employment land lost to residential development

Employment Land lost to Housing = 0.45 Ha. (developments completed in the period)

Analysis of Policy Performance and Effects

Many of the policies in this chapter are site specific and therefore they are only applied when that specific area is considered. Policy EM01 is widely used and Policy EM02 is considered important in retaining the designated General Employment Areas, as well as allocating new sites. Policy EM15 is used to defend employment sites but many applicants try and find loopholes and ways to demonstrate that a site is unviable for employment uses and that a marketing scheme would not succeed for employment uses. The new part of Policy EM15 (Part 2) is not used as no applicant has produced an acceptable approach to demonstrate that the site is unviable although this may be used in

the future. This part of the Policy EM15 also needs some clarification. There have been 4 applications to change the use of employment land to residential development using the first part of Policy EM15 starting in the year covered by this monitoring report.

As well as using Babergh Local Plan policies for development control decisions Structure Plan policies ECON 1 and ECON 6 are also used. These relate to expansion of existing uses and warehousing and distribution.

There have been problems with industrial/employment areas near or adjacent to residential areas, as they often are in small towns and villages. Existing policies are considered to lack clarity, which causes problems for residents when they do not know how high or how a new employment building will be finished if it is adjacent to them.

Some employment areas, which do not have an overall development brief, have developed in an ad hoc way and they are now becoming difficult to let and not as attractive as new areas. One possibility is to consider a supplementary planning document giving more detailed guidance on the layout and design of employment areas, particularly adjacent to housing.

From the Babergh Local Plan the main policies used initially for development control purposes are EM1 and EM12. There are no policies not being implemented.

Chapter 5 Shopping

The objectives of the shopping chapter policies are: -

1. To protect and enhance the vitality and viability of the market towns of Sudbury and Hadleigh and to promote new retail investment in their defined town centres, in order to maintain and enhance their role as the main shopping areas in the Babergh District.
2. To define and protect “prime” shopping frontages in the two town centres.
3. To regularly monitor the economic well being of the two town centres and to publish Town Centre Health Check reports on a regular basis.
4. To support the retention of existing shopping facilities in rural areas and local centres and to encourage the provision of new facilities where this is consistent with Local Plan policies.

Policies Not Being Implemented

None.

Local Services Core Output Indicators

Local Services, which covers retail, office, assembly and leisure uses are relevant but cut across chapters.

Use Class	Total area completed	Area completed in town Centres
A1 Retail	1060 m ²	1060 m ²
B1(a) Office	473 m ²	-

There were no other completions within this indicator during the period covered by this annual monitoring report.

Analysis of Policy Performance and Effects

All the policies in this chapter are being implemented. However, the pressures on town centres from non-retail uses have meant that A1 uses (shops) are declining as a proportion of shop units. In villages competition means it is difficult to make small shop units viable and their value as a house is usually far greater. Existing shop units are therefore under constant pressure to change to housing. There are however, still people interested in running shops and services in villages.

Farmers are under pressure to diversify their businesses and farm shops are one possibility to allow for this but there are many problems with running this type of business in the countryside from a traditional farm building. In order to make these businesses commercially successful the variety of goods sold and the intensity of use have to increase. These changes bring farm shops into conflict with the sustainability objectives of the development plan. There are other planning issues and problems, which may arise. Policy SP07 relating to this issue can be interpreted in many ways, which makes its application difficult.

Development Plan and Supplementary Planning Documents will have to take into account the pressures identified above, particularly if it is considered appropriate to safeguard A1 shop uses in the two main town centres retail frontages.

Chapter 6 Countryside and the Rural Economy

The objectives of this chapter are: -

1. To protect and, where possible, enhance the countryside, taking account of its natural beauty and features of archaeological or historic interest.
2. To make the countryside more accessible to the public, where this is consistent with the need to protect agricultural land and areas of wildlife importance.
3. To provide housing to meet local needs through the application of the Local Plan housing policies and the District Council's role as an enabler in housing provision.
4. To encourage the rural economy through the diversification and sensible re-use or conversion of rural buildings.
5. To encourage new initiatives for rural enterprises.
6. To encourage a community-based approach to rural problems.

Policies Not Being Implemented

None.

Local Services Core Output Indicator

Open space managed to Green Flag Award Standard

None of the Council's open space is managed to Green Flag Award Standard.

Analysis of Policy Performance and Effects

In an attractive and economically successful district the countryside is constantly under pressure for change and development. There are no policies in this Chapter where a decision has been made not to implement them, but several policies are used very little. Conversely there are certain policies that are used widely and should be retained perhaps with some alteration or to incorporate the aims of other policies.

The core policies relating to the Areas of Outstanding Natural Beauty and Special Landscape Areas, the countryside and their protection are widely used and it is considered that they should be retained. Policies, which are subordinate to these main policies, are less well used and it may be possible through the production of Development Plan and Supplementary Planning Documents to merge some of these policies or include them in supporting text. Careful negotiations often achieve the desired result from a planning application rather than being dependent on a specific policy in the plan.

Policies relating to best and most versatile agricultural land, agricultural workers dwellings, agricultural occupancy conditions, farm diversification and buildings in the countryside are also used frequently. It is likely that they will need slight alteration to rectify particular

problems and take into account any new guidance. Village facilities of all kinds are under constant pressure and are often more financially valuable as housing. The policies seeking to safeguard these facilities are considered important and necessary to try to retain as many facilities as possible to keep villages as sustainable as possible.

Policy CR22 relating to change of use of farmland to garden land generally operates satisfactorily but this type of development can result in inappropriate fencing, planting or other structures, which are harmful to the rural landscape and character.

There may be a need to review other policies in this Chapter as part of the new planning process.

Chapter 7 The Built Environment and Conservation

The objectives of this chapter are:-

1. To retain local distinctiveness.
2. To achieve high quality development that protects and enhances the built environment particularly conservation areas or which have an impact on views into or out of a conservation area and to protect buildings listed as being of special architectural or historic interest through the strict control of development.
3. To identify circumstances in which the District Council itself will take positive action to improve the appearance of areas and buildings, by concentrating the use of its limited resources to the greatest benefit.
4. To bring about environmental improvements through development opportunities by liaising with the Transport Authority, statutory undertakers and other agencies to maintain a consistently high standard of approach to the built environment.

Policies Not Being Implemented

None.

Analysis of Policy Performance and Effects

There are two parts to this chapter, one dealing with the quality of design and the environment and the other dealing more specifically with Conservation; it may be more appropriate to consider separating these two topics in future. Some policies could be included in the core policies that relate to all development and others are more detailed in nature and relate to specific conservation issues.

Policy CN01 relating to new development is very general, widely used and works well but should be included in core policies. Policies CN30 and CN31 are also general, they deal with access for people with disabilities as well as the need to deter crime and vandalism, and these could also be included in core policies.

More specific conservation policies relating to listed buildings, CN09 and CN10, are considered important and should stay. For CN10 there also needs to be an explanation in the supporting text that the policy also applies to buildings within the curtilage of a Listed Building. Policy CN14 relating to the painting of listed buildings could be included within policy CN10.

Policies CN16 and CN17 relating to locally listed buildings could be amalgamated and criterion based. Policy CN02a relating to conservation areas is important but also needs to refer to any other structures, which may be constructed in a conservation area, in addition it could also incorporate relevant parts of policy CN21 relating to power cables. Policy CN03a on removal of permitted development rights could be supporting text and not a policy. Policy CN18, a general design policy, could be incorporated into the core policies of the new system, it does not need to be with the specific conservation policies.

Policy CN20 relating to safeguarding important street furniture could be included in supporting text.

Policy CN24 relating to advertisements could be dealt with by a supplementary planning document rather than in a policy.

Policy CN22 regarding under grounding of wires is a desirable policy and would be implemented if finance is available but there are only a few occasions when there is sufficient money to implement it.

Policies CN06 and CN07 relating to nationally and locally important parks and gardens could be amalgamated.

Policies CN26, CN27 and CN28 relating to archaeology need to be reviewed, parts of these policies could be combined while other parts could be supporting text. Archaeology is a responsibility of Suffolk County Council currently.

Chapter 8 Recreation and Tourism

The objectives of this chapter are:-

1. To provide for the recreational needs of the community.
2. To introduce opportunities for informal recreation in rural areas consistent with the need to conserve the District's high quality countryside.
3. To ensure through the strict control of development that recreational activities do not conflict with biodiversity, landscape character, cultural heritage, residential amenity or road safety.
4. To work in partnership with other agencies in promoting tourism in the District, so as to realise wider economic and other objectives where this is consistent with the need to protect the environment.
5. To manage the activities of tourists in the more sensitive locations and to encourage tourism throughout the rest of the District.
6. To encourage the provision and retention of recreational facilities where this does not conflict with other policies in the Local Plan.

Policies Not Being Implemented

None.

Analysis of Policy Performance and Effects

Policies RE01, sports facilities, RE03 Protection of playing fields, RE08 small and medium scale recreation, RE09 large-scale recreation, RE14 Great Cornard Country Park and RE28 Tourism facilities are used where appropriate. Other policies are either not used, or are little used. Some of these policies could be amalgamated to produce a wider ranging single policy. Policy RE06 relates to new public open space in housing developments and this could be covered by housing policies HS15 and HS16. Policy RE18 covering the Stour and Orwell Estuaries could be covered by a modified or expanded policy CR19 with revised wording in the Countryside and Rural Economy Chapter 6.

Policies RE07 (relating to small and medium scale recreation facilities) and policy RE13 relating to touring caravans could possibly be amalgamated, however there is no clear definition of small or medium scale recreation facilities.

Chapter 9 Transport

The District Council is not a highway authority but through the development control process it can have an important impact on the transport system. In Chapter 9 the objectives are as follows:-

1. To encourage an effective and efficient transport system that provides greater opportunities for choice for all members of the community; and to balance the needs of the car against the needs of public transport and non-motorised users such as cyclists and pedestrians.
2. To reduce the environmental impact of travel and to limit the growth of road traffic.
3. To encourage the use of modes of transport other than the private car.
4. To make adequate provisions for all transport modes in new developments that recognises the wider strategy for such modes.
5. To safeguard land for highways and other transport proposals.
6. To help reverse the decline in use of public transport.
7. To reduce the need for travel through improved land use and development strategies through better integrated planning.

Policies Not Being Implemented

None.

Transport Core Output Indicators

Car parking for non-residential developments

All non-residential developments comply with the parking standards set out in the development plan and these are applied across the whole of Suffolk.

New residential development within 30 minutes public transport time of services

This is not currently monitored.

Analysis of Policy Performance and Effects

Generally the policies in this chapter are applied to larger schemes. The most used policy that is used on the majority of applications is from the 1995 adopted Local Plan Policy relating to car parking provision.

On smaller schemes, standard conditions, comments, reasons and informatives are provided by the County Council as highway authority are used. These are countywide conditions and do not refer to specific Babergh District Council policies.

Chapter 10 Sudbury Town

The objectives of this chapter are:-

1. To promote and enhance the role of Sudbury as an important commercial, tourist and social centre.
2. To identify suitable sites for residential development in order to introduce more housing into the town centre.
3. To find suitable uses for several strategic sites in the town centre which are to be vacated by their present users during the Plan period.
4. To preserve and enhance the town centre's exceptional built environment.
5. To introduce further improvement schemes and measures, thereby maintaining a pleasant environment for residents, shoppers and visitors and encouraging economic generation.
6. To actively seek solutions to alleviate traffic problems in the town.

Policies Not Being Implemented

None.

Analysis of Policy Performance and Effects

Policies in this chapter are used when necessary, some of them are rarely used though. Policy SD01a, relating to the retention of shops in the primary shopping frontage, has not proved strong enough. It does not ensure that if a unit becomes vacant which is not in retail use, that it should be used as a retail shop when a new user comes forward to occupy it. Clearly, the level of market demand for retail uses is also a potential factor here. This has resulted in a gradual decrease in shop units in this part of the centre of Sudbury.

For a variety of reasons several of the specific proposals in the plan have not been developed yet. Several of the policies in this chapter and supporting text have been subject to Pre-Inquiry changes, particularly in order to comply with the Local Transport Action Plan.

Chapter 11 Hadleigh Town

The objectives of this chapter are:-

1. To protect and enhance Hadleigh's role as a local shopping centre.
2. To actively seek solutions to traffic problems in the town.

3. To preserve and enhance the town centre's exceptional built environment for residents, shoppers and visitors.
4. To retain and extend accessible public car parking provision, and to ensure easy and safe access for pedestrians into High Street and other central areas.

Policies Not Being Implemented

None.

Analysis of Policy Performance and Effects

In a pre-Inquiry change the proposed location for the supermarket within Hadleigh was altered to the edge of centre site at Brett Works between Pound Lane and Bridge Street. This proposal is controversial and received many objections at the Local Plan Inquiry.

Most of the policies in this chapter operate satisfactorily and are used when necessary. The most widely used policy HD03 (protection of retail frontages) generally works well, however, there is a lack of clarity over what is a considerable period for the shop unit to remain vacant and the type of documentary evidence required needs clarifying. Policy HD11 has now been implemented and the Health Centre has been extended.

Chapter 12 Chilton Mixed-Use Development Package

This chapter covers a proposal for a major extension to Sudbury and has been controversial with many objections raised at the Local Plan Public Inquiry. The Council intends to implement the proposal although no development has commenced. There are only two policies in the chapter.

Policies Not Being Implemented

None that apply. These policies both land allocations, the first being that to control the entire Chilton development. It is still too early for these land allocations to be realised and accordingly the policies cannot be implemented yet.

Analysis of Policy Performance and Effects

As above, analysis not yet possible.

Commentary on the Suffolk Structure Plan 2001

The Suffolk Structure Plan 2001 forms part of the Development Plan for the District and some of the policies are used for development control purposes. Under the draft East of England Plan, as the Regional Spatial Strategy, some of the Structure Plan policies are proposed for saving, see Appendix E of the draft plan for a list of these.

Policies Not Being Implemented

None.

Housing Core Output Indicator

Policy CS8 requires Babergh District to complete an average of 345 dwellings per annum, including 55 in the Ipswich Policy Area (IPA). Last year 187 dwellings were completed in the district overall and 0 in the IPA. The annual totals are set out under chapter 3 above, with the average annual rate of 276 over the last 5 years.

Analysis of Policy Performance and Effects

Structure Plan policies are used when appropriate for development control purposes, as well as providing a basis for some Local Plan policies. Accordingly, they are implemented in different ways. County Strategy policies have been used to select site allocations in the Local Plan and to 'defend' the allocation of sites at the Local Plan Inquiry. Policies CS3 and CS7 have been particularly well used. Two policies relating to commercial development are used in development control ECON 1 and ECON 6, they are generally considered effective.

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

No LDOs applicable as none adopted.

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

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