

Analyses of Responses to the Issues and Options Babergh Core Strategy

September 2009



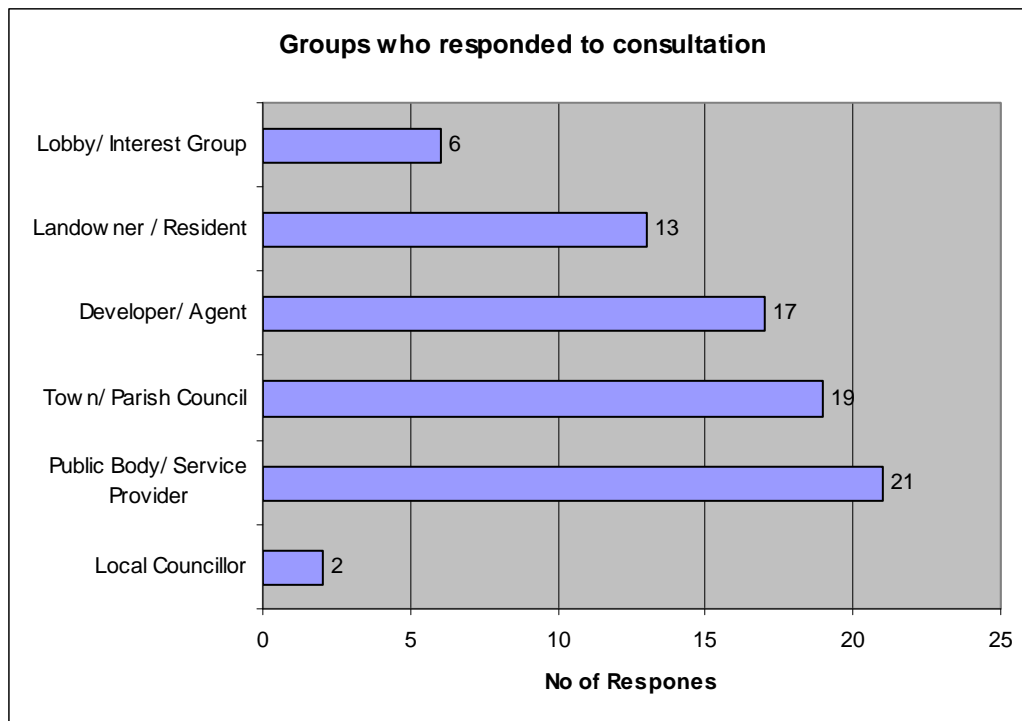
1. Introduction

The Babergh Core Strategy, Issues and Options consultation was published on the 14th April 2009 for a period for six weeks ending on the 26th May 2009. The aim of the report was to start consultation about the main issues to be addressed in the Babergh Core Strategy and possible options to address these issues. The outcome of the consultation regarding the Issues and Options document will inform the preparation of the Babergh Core Strategy.

The Core Strategy is a strategic document that will set out the vision and spatial strategy for the Babergh District. It will provide a long term spatial vision for Babergh and how that vision will be met, including working with other organisations to achieve this. The Core Strategy is about broad issues and does not deal with the detailed information regarding development management issues or site specific issues.

Subsequent stages in the Core Strategy will set out overall strategic policies to tackle the issues defined in the Issues and Options document and include the detail of how these policies will operate in practice.

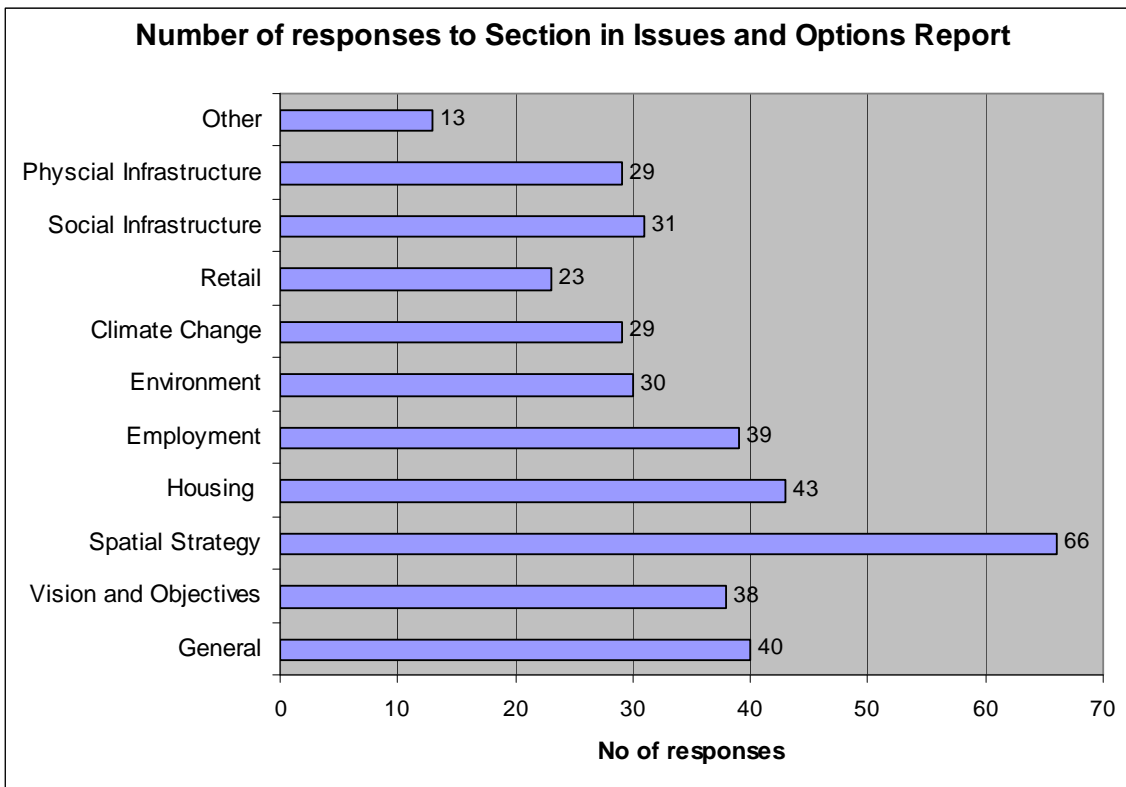
A total of 78 individuals and organisations responded to the Issues and Options consultation. A total of 381 comments were received regarding the Issues and Options, Core Strategy.



It is difficult to generalise from the comments received. The analysis below considers each of the sections considered in the Issues and Options document. Comments are analysed based on the following structure:

- overall response in terms of number and percentage against each possible option;

- an analysis of the comments received, including from the main statutory bodies and organisations; and
- a brief summary of the main issues raised.

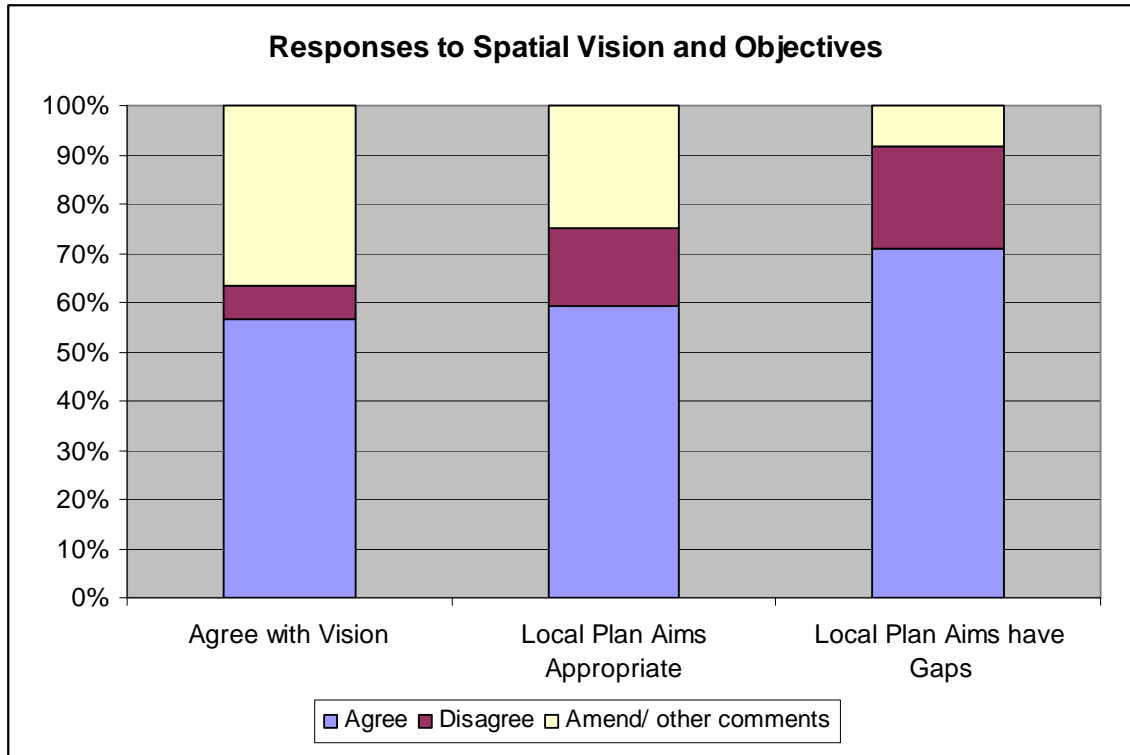


2. Spatial Portrait, Vision and Objectives (Q SV01 – SV03)

Seven individuals/ organisations commented on the Spatial Portrait, including GO-East, English Heritage, Suffolk Constabulary, GeoSuffolk, a local councilor and developers/ agents. Issues raised include:

- Key issues for the district should be more clearly set out/ summarised.
- Differences between the characteristics of the Ipswich fringe and the rest of the Babergh District should be identified;
- The benefits of the River Orwell and Stour in terms of employment and leisure should be recognised;
- The environmental characteristics could be expanded;
- More should be said about the outstanding character and quality of the historic environment, especially many important settlements; and
- Crime and disorder is an important issue to local people.

Thirty five individuals/ organisations commented on the Spatial Vision and Objectives, including comments from GO-East, Natural England, Suffolk County Council, Sport England (East), the Environment Agency, Suffolk Constabulary, Suffolk PCT, Ipswich Hospital NHS Trust, English Heritage, Suffolk Coasts and Heath AONB, a number of Parish Councils and Developers/ Residents/ and Local Councillors.



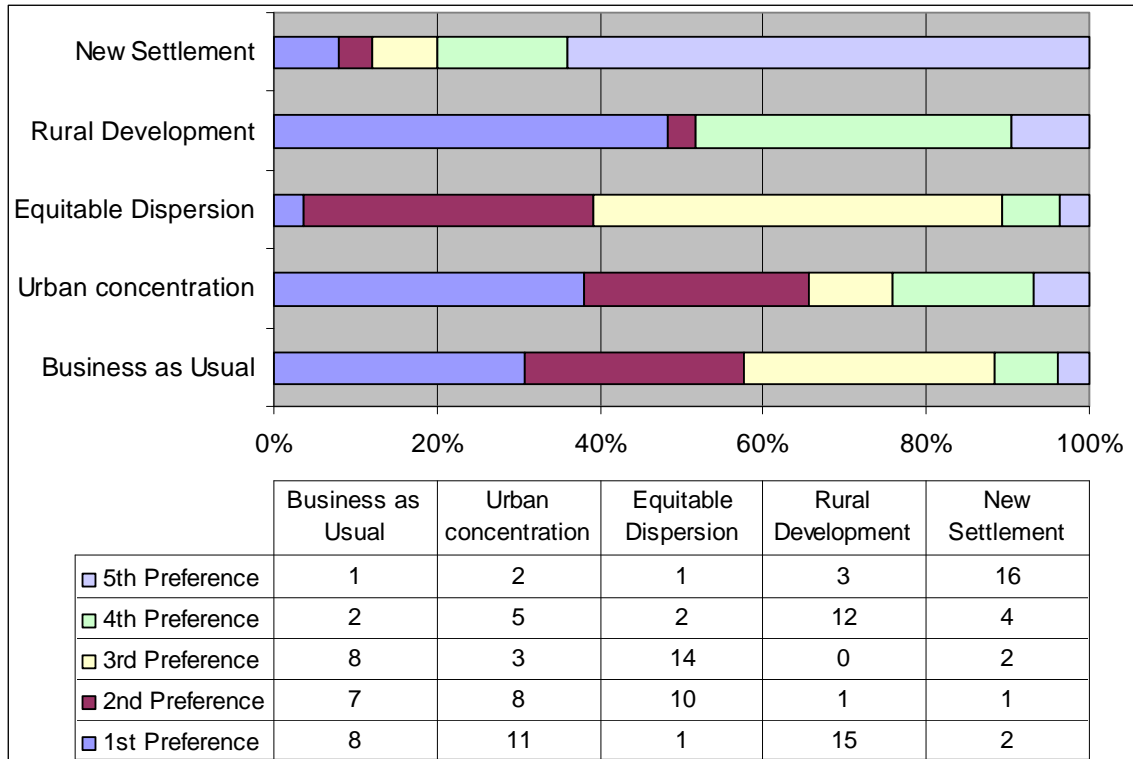
Most of the comments were in support of the vision and Local Plan Aims but a number of responses identified gaps. Issues raised in the responses include:

- The spatial vision and objectives are not spatially specific to the district;
- Gaps identified include the physical well being of Babergh residents; use of brownfield land; allocating sufficient land for all required uses; promoting economic development in a positive manner, the need to spread development across the district including at smaller villages, the need for greater sustainability in the district, the need for greater flexibility; the need for certainty; defining infrastructure in more detail and allowing for flexibility in terms of infrastructure requirements, placing more emphasis on the built form and character of settlements, promotion of town centres, provide sufficient local services and facilities and conserving, enhancing and managing the heritage of and the environment in the district.

3. Spatial Strategy for the District (Q SS1 – SS10)

Spatial Strategy (Q SS1 – SS2)

Fifty two individuals/ organisations commented on the Spatial Strategy, including GO East, Natural England, Environment Agency, Highways Agency, Suffolk PCT, Ipswich Hospital NHS Trust, Suffolk Constabulary, Suffolk County Council, Braintree District Council, St Edmundsbury Borough Council and several Parish Councils.



Comments received regarding advantages and disadvantages for the different spatial options as shown in the table below:

Options	Advantages	Disadvantages
Business as Usual	<ul style="list-style-type: none"> Balanced, sustainable approach. Supported by national and regional guidance Affordable housing greatest in Sudbury Viable, realistic, deliverable 	<ul style="list-style-type: none"> Not flexible; Not viable Not respond to challenges and issues in district (needs in villages, out commuting, Affordable Housing, support services, infrastructure constraints) Non-compliant with national and regional guidance Impact on Ipswich fringe, Sudbury and Hadleigh (environment, quality of life and infrastructure)
Urban Concentration	<ul style="list-style-type: none"> Supported by national and regional guidance Achieve sustainable growth (including main employment in urban areas, promote mixed uses) Significant growth not reason to discount (growth in towns not higher than that in recent years) Use all available brownfield land Reduce out commuting Allocate development where demand exists 	<ul style="list-style-type: none"> Reliance on Ipswich fringe Sudbury and Hadleigh at physical capacity and have limited brownfield capacity Not respond to challenges and issues in district (socio-eco needs of district, out commuting, infrastructure capacity) Not flexible to respond to changing circumstances or to deliver housing

Options	Advantages	Disadvantages
	<ul style="list-style-type: none"> ▪ Maximum use of infrastructure and reduce requirement in locations less able to provide ▪ Viable, realistic and deliverable 	
Equitable Distribution	<ul style="list-style-type: none"> ▪ Supported by national and regional guidance ▪ Community benefits such as affordable housing ▪ Meet local needs, choice of housing and employment ▪ Retain local services and deliver new facilities and infrastructure ▪ Prevent out-commuting to locations across the district ▪ Flexibility and adequate supply maintained ▪ Well separated large villages throughout the district and this serves as important rural service centres ▪ District wide strategy not just urban strategy 	<ul style="list-style-type: none"> ▪ No feasible or viable ▪ Will not satisfy existing demand ▪ Infrastructure problems ▪ Out-commuting ▪ Use of Greenfield sites ▪ Social housing need in Sudbury not addressed
Rural Development	<ul style="list-style-type: none"> ▪ Removes some of the burden from Sudbury/ Great Cornard including infrastructure needs (existing), reduce sprawl on Ipswich fringe ▪ Offer wide choice of location for housing and address demands ▪ Affordable housing in district ▪ Villages not dormant, new development would support and sustain services and facilities ▪ Flexible growth not just in few settlements ▪ Based on planning policy, population trends, rural nature of the district, settlement pattern ▪ Allow some growth in the Ipswich fringe ▪ Ensure delivery 	<ul style="list-style-type: none"> ▪ Agree with disadvantages listed. ▪ Not feasible/ viable ▪ This will not satisfy existing or projected Affordable Housing demand ▪ Aversely impact on infrastructure ▪ Use of Greenfield land ▪ Out commuting ▪ Greater environmental impact ▪ Contrary to government objectives of low carbon and non compliant with government guidance ▪ Burden on KSC
New Settlement	<ul style="list-style-type: none"> ▪ Support as strategic reserve to provide sufficient flexibility to strategy if RSS to be reviewed and increased target for the district ▪ Protects character of towns and villages and better infrastructure to be provided 	<ul style="list-style-type: none"> ▪ Will not create vibrant, sustainable, self-sufficient community New infrastructure required, not minimum size to support infrastructure ▪ Not flexible, question delivery, not viable or robust ▪ Don't respond to socio-economic issues (demands for housing and employment delivery, out commuting) ▪ Non compliant with RSS

Other key issues raised include:

- The Core Strategy should provide for spatial framework up to 2031;
- RSS Review needs to be considered;
- Housing targets minimum and should consider what appropriate for the district;
- Key Service Centres should be identified;
- Brownfield land should be used first,
- The impacts of the Spatial Strategy on surrounding areas should be considered;
- Reduce loss of greenfield land and environmentally sensitive land;
- Support expressed for strategy that allows for some development within and around sustainable villages; and
- Impacts on the historic and natural environment should be considered.

Eighteen individuals/ organisations commented on alternatives for the spatial strategy.

Alternative spatial strategy approaches (Q SS2)	Number of comments	Percentage
Yes	12	67
No	6	33

Other approaches suggested in the responses include:

- A variation between Equitable Distribution and Rural Development should be considered;
- Rural Development should be re-considered;
- Local priorities should be recognised and some growth should be steered toward unsustainable villages;
- The impacts on climate change should steer development;
- Spatial distribution and infrastructure should steer growth; and
- More growth at Ipswich Fringe should be considered including south and adjacent to the A14.

Rural Housing (Q SS3 – SS5)

Twenty four individuals/ organisations commented on the approach to rural housing, including the Environment Agency.

Change approach to sustainable/ unsustainable villages (Q SS3)	Number of comments	Percentage
Yes	11	46
No	11	46
Other	2	8

Other approaches suggested in the responses include:

- Local priorities should be recognized;
- Growth should be based on the need for and environmental impact of more growth in villages;
- Modes developments in the sustainable villages should be allowed;
- Development in rural areas should be confined to rural affordable housing;
- A settlement hierarchy should be defined;
- Need to improve and sustain services and facilities in small villages; and
- Brownfield land should be used first.

Nineteen individuals/ organisations commented on the approach to rural housing, including the Environment Agency.

Options (Q SS4)	Number of comments	Percentage
Development up to 3 dwellings in unsustainable villages	8	42
Development up to 5-6 dwellings in unsustainable villages	4	21
Development up to 15 dwellings in unsustainable villages	2	11
Where appropriate development should be allowed	5	26

Other issues raised include:

- Existing allocations and recent levels of development should be recognised and development should be limited to 20-30 dwellings in sustainable villages;
- Flexibility should be applied;
- It depends on suitability of sites, rail links, infrastructure; the environment; conservation areas, the AONB and development in unsustainable villages should not be close to trunk roads; and
- The Ipswich fringe should receive development first.

Seventeen individuals/ organizations commented on if particular rural locations should receive or preclude residential development, this included a number of Parish Councils, the Highways Agency, Suffolk Coast and Heaths AONB, a local councilor, a residents committee and agents/ landowners/ residents.

Comments relating to areas to be precluded from development referred to Bures St Mary, generally rural areas with the exception of affordable housing and brownfield sites; and unsustainable locations close to trunk roads. Areas to receive residential development included rural locations with rail links, where infrastructure and environment would allow limited growth, the impact on the AONB and conservation areas has to be considered, Ipswich Fringe, where it will support services and generally small scale development in rural areas.

Affordable Housing in Rural Areas (Q SS6)

Nineteen individuals/ organisations commented on delivery of affordable housing in Babergh's largest villages, including six Parish Councils, Shelter Eastern Counties Advice Service, Suffolk Coast and Heaths AONB, Greenwich Hospital, 2 local councilors, one residents committee and six residents/ developers.

Comments (Q SS6)	Number of comments	Percentage
Allocate open market and affordable housing sites	3	16
Allocate affordable housing sites only	6	32
Other approach	9	47

Don't provide affordable housing	1	5
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Other approaches suggested to affordable housing include:

- Lower thresholds than 15 dwellings should be applied and subdivisions should not be allowed;
- All market housing should deliver affordable housing;
- Small houses should be built to make house prices more affordable;
- Flexibility should be built into the approach including looking at alternative approaches such as Community Land Trusts; and
- Dealing with Housing Associations only, not private developers.

Meeting Housing Growth (Q SS7)

Twenty one individuals/ organisations commented on meeting housing growth in the district, including GO East and a number of Parish Councils.

Comments (Q SS7)	Number of comments	Percentage
Provide more than RSS numbers	2	10
Provide RSS numbers/ or as minimum	13	65
Provide Less than RSS numbers	4	20
Other	1	5

Other issues raised include:

- RSS numbers should be provided for but flexibility should be built in to meet possible higher demands and the RSS Review;
- Lower numbers than the RSS numbers should be provided for as this will have an unacceptable impact on the environment, infrastructure, character of the district and communities and lower numbers should be provided for as a result of the recession;
- Higher numbers should be provided for recover from the recession, to provide for needs and affordable housing needs and higher numbers should be provided for in the Ipswich Fringe to enable regeneration of the Haven Gateway.

Brownfield Land Use (Q SS8 – SS10)

Twenty one individuals/ organisations commented on the priority of brownfield land, including GO-East, Natural England, the Environment Agency and a number of Parish Councils.

Comments (Q SS8)	Number of comments	Percentage
Use of brownfield land priority/ preference	11	46
Where appropriate; case by case use of brownfield preference; only one consideration; evidence should inform	12	50
Low priority	1	4

Other comments related to considering whether it would be appropriate to use brownfield land including considering sustainability, the nature of the district,

deliverability and availability of brownfield sites and the merits of the site/ site considerations have to be considered.

Comments (Q SS9)	Number of comments	Percentage
Higher than 60% brownfield target	7	30
Brownfield target of 60%	7	30
Lower brownfield target than 60%	1	4
Depends on local information/ circumstances	8	35

Comments also indicated that the nature of the district and the merits of sites will have to be considered and that the target will need to adapt to changing circumstances.

Comments (Q SS10)	Number of comments	Percentage
Apply brownfield target to all development	11	55
Don't apply brownfield target to all development	2	10
Brownfield target should be appropriate to surroundings/ circumstances	6	30
Apply brownfield target to housing and industrial development	1	5

4. Housing (Q H1 – H10)

House Types and Sizes (Q H1)

Seventeen individuals/ organisations commented on including a policy relating to house types and sizes in the Core Strategy, including GO East and a number of Parish Councils.

Comments (Q H2)	Number of comments	Percentage
Include policy in Core Strategy relating to Housing Types and Sizes	14	67
Don't include a policy in the Core Strategy relating to Housing Types and Sizes	3	14
Other comments	4	19

Other issues related to the following:

- Requirements in PPS3, paragraph 22 should be addressed;
- The policy should not be over prescriptive and should be flexible to adapt to changing demands as well as to enable site-by-site considerations to apply
- A policy should be included in a Development Control DPD.

Affordable Housing (Q H2 – H7)

Twenty one individuals/ organisations commented on affordable housing provision options, including GO East and a number of Parish Councils.

Comments (Q H2)	Number of comments	Percentage
Target of less than 500 affordable dwellings	1	6

Target of 500 affordable dwellings	7	39
Target of 600 affordable dwellings	2	11
Target of more than 700 affordable dwellings	2	11
Other information should determine targets such as local needs and viability considerations	6	33

Other issues raised include:

- Sufficient information should support targets and other considerations such as the environment would impact on the appropriate target;
- Targets should be able to adapt to circumstances and the recession and slower housing delivery should be considered.

Comments (Q H3)	Number of comments	Percentage
Agree with 75% social rented and 25% intermediate affordable housing	8	47
Local Information/ evidence should indicate	6	35
Different tenures; other	3	18

Other issues raised include:

- Tenures should be based on appropriate assessments and information;
- In the current recession the mentioned tenure splits might not be achievable or viable including intermediate affordable housing;
- Flexibility should be incorporated with some support for only short term flexibility; and
- Allow for Key Worker Accommodation.

Comments (Q H4)	Number of comments	Percentage
Reduce the percentage of affordable housing to less than 35%	2	10
Leave the percentage of affordable housing at 35%	7	35
Increase the percentage of affordable housing to 40%	6	30
Need information to support requirements	5	25

Other issues raised include:

- Robust information should support requirements including viability assessments;
- Lower thresholds should be considered; and
- Different targets for different areas within the district should be considered.

Comments (Q H5)	Number of comments	Percentage
Lower percentage provision for lower thresholds	10	42
Standard percentage requirement and lower thresholds	8	33
Lower threshold no provision specified	1	4
Need information to support requirements	4	17
Different requirements should be applied to different areas	1	4

Other issues raised include:

- If a lower site threshold of 15 is proposed robust evidence should justify this approach; and
- Flexibility should be built into the approach and this should also relate to local need.

Comments (Q H6)	Number of comments	Percentage
Agree rural exception sites in groups for smaller villages	10	63
Don't agree with rural exception sites in groups for smaller villages	3	19
Not sufficient information or no comment	3	19

Other issues raised include:

- Rural exceptions sites should relate to demand and be appropriate;
- It would depend on the site specifics whether or not rural exceptions sites would be appropriate;
- More information is required to support rural exception sites.

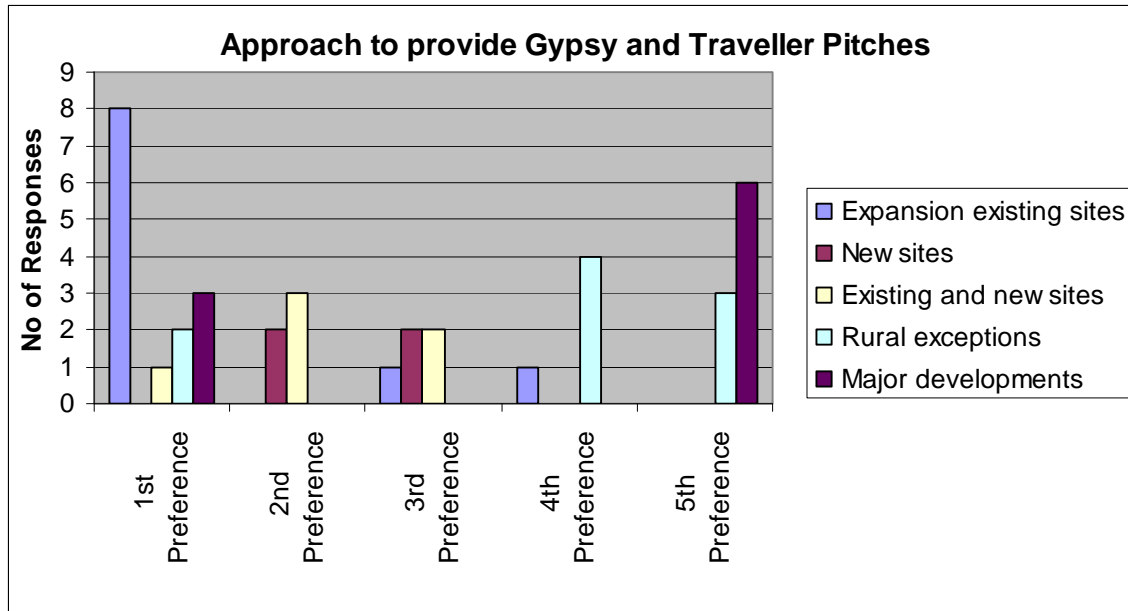
Comments (Q H7)	Number of comments	Percentage
Agree that more flexible approach towards rural exceptions sites should be adopted	9	56
Disagree that flexible approach towards rural exceptions sites should be adopted	5	31
Not sufficient information or no comment	2	13

Other issues raised include:

- Rural exceptions sites should relate to demand and be appropriate;
- Different targets for different areas within the district should be considered.

Gypsies, Travellers and Travelling Showpeoples' Accommodation (Q H8 –H10)

Eighteen individuals/ organisations commented on the provision of Gypsies, Travellers and Travelling Showpeople's accommodation, including GO East, Ipswich Borough Council, the Environment Agency, several Parish Councils, individuals, councillors and developers.



Other issues raised include:

- The Core Strategy should set out criteria for the location of gypsy and traveller sites to be used in the allocations DPD;
- Options should relate to the provision of pitches to 2011 and not just 2011 – 2021;
- The number of pitches to be provided should be clarified;
- No suitable Gypsies, Travellers and Travelling Showpeople’s sites were identified in the responses.

Comments (Q H10)	Number of comments	Percentage
Provision of transit sites should be related to needs	7	58
Transit sites should be at large urban areas	1	8
Babergh should provide share of regional transit site need	1	8
Babergh not suitable transit site	1	8
No comment/ don’t know	2	17

Other issues raised include:

- Provision of transit sites should be linked to local needs;
- The outcomes of joint working initiatives should be addressed in the Core Strategy as work on this aspect progress.

5. Economy and Employment (Q EMP1 – EMP9)

Employment Numbers and Employment Land (Q EMP1 – EMP7)

Thirty three individuals/ organisations commented on the economy and employment section, including GO East, the Environment Agency, Highways Agency, Suffolk County Council, Tendring District Council and a number of Parish Councils.

Comments (Q EMP1)	Number of comments	Percentage
Agree wait for ELR before setting targets for job growth	21	84
Disagree to wait for ELR before setting targets for job growth	3	12
No comments/ Other	1	4

The comments related to the following:

- Consult on options once the Employment Land Review is completed;
- Need to significantly increase employment numbers;
- The RSS employment numbers are indicative only.
- The outcomes of the Suffolk Economic Strategy has to be considered;

A number of views were submitted regarding the sections or industries that Babergh District Council should focus on attracting (Q EMP2). These included:

- Small and localised businesses; service industries and light industrial, leisure and marine related development;
- Rural businesses including food production;
- New industries/ growing industries such as energy; Biotech; ICT; and knowledge industries or highly skilled jobs should be developed;
- Along the A12/ A14 heavier industries should be considered as well as storage uses;
- The role of Babergh District has to be considered and potential to increase industries in the region; and
- The impact on the environment and character of the district, amenity and infrastructure should be considered carefully.

Comments (Q EMP3)	Number of comments	Percentage
Economic growth should match housing growth	12	55
More jobs should be provided than housing	2	9
Other considerations such as the environment, infrastructure and access should determine or where appropriate	4	18
Other comment	4	18

The comments related to the following:

- Job provision will reduce commuting and there is an unsatisfied demand for employment;
- Releasing land for housing should not be linked to employment land being developed.
- The Spatial Strategy should be job led.

Comments (Q EMP4)	Number of comments	Percentage
Retain employment land as priority	6	29
Alternative approach	14	67
No comments	1	5

Most support was expressed for an alternative approach to employment land in the Core Strategy, comments related to:

- the number of jobs and skills on sites should be maximised and mixed sites could be more appropriate for this
- the policies should be reviewed frequently and should be more flexible particularly relating to rural employment and home working
- retained employment sites should be considered in terms of viability, availability and deliverability
- the most appropriate use of sites should be considered
- the need for employment land supply within the district should be considered
- employment allocations/ safeguarding of employment land should be considered in the light of the spatial strategy for the district.

Comments (Q EMP5)	Number of comments	Percentage
Maintain existing allocations and extend	3	12
Maintain existing allocations and make new allocations at towns and key service centres	4	16
Maintain existing allocations and allocate at local and rural centres	1	4
De-allocate sites and allocate elsewhere	1	4
Provide new employment land at same locations as residential development, or through mixed use development	3	12
Mix of above options	13	52

Additional comments related to:

- infrastructure provision in association with employment provision should be emphasised;
- the ELR and the Sustainability Appraisal should inform the approach to employment land provision; and
- A combination of the options should be included.

Comments (Q EMP6)	Number of comments	Percentage
Agree employment development should be on PDL	12	52
Employment development should be on PDL where appropriate (environment, biodiversity, character of towns, etc)	8	35
Deliverability, Achievability and Availability should be considered	2	9
Only where sufficient jobs could be provided	1	4

Most support was expressed for utilising of brownfield sites, however some of these comments and other comments also indicated that various factors should be considered including:

- flexibility in the approach;
- consideration should be given to site specifics on a case-by-case basis;
- the most appropriate use of the land;

- the impacts on character of the area, the environment, climate change and amenity; and
- the need for the development to be sustainable and the need for sufficient transport infrastructure.

Comments (Q EMP7)	Number of comments	Percentage
Agree allocate strategic sites	8	44
Disagree allocate strategic sites	2	11
Other comment	8	44

Other comments included:

- there should be flexibility in the policy;
- the ELR will inform whether strategic sites should be allocated;
- sites should be appropriate to surroundings;
- each case should be considered on its own merits;
- mixed-uses should potentially be accommodated;
- there may be need for strategic employment sites in Sudbury and Hadleigh;
- sustainability, transport infrastructure and impacts on climate change should be considered; and
- sites should look at organic food production, low carbon housing materials and renewable energy production.

Comments (Q EMP8)	Number of comments	Percentage
Agree with rural economic growth	15	75
Disagree with rural economic growth	3	15
No comment	2	10

Most responses agreed with the rural economic growth in relation to the renewable energy industry. Some concern/ caution were expressed in terms of:

- Need to include criteria to evaluate these aspects;
- the terms should be more clearly defined;
- the impact on the environment and biodiversity will have to be considered as well as the impact on sustainability and transport infrastructure.

Comments (Q EMP9)	Number of comments	Percentage
Agree to actively promote tourism	13	65
Disagree to actively promote tourism	4	20
No comment	3	15

Most responses agreed that the district should be actively promoted as a tourism destination. Some concern/ caution were expressed in terms of:

- This approach should be evidence led and should be sustainable;
- the impact on the environment and landscape will have to be considered;
- this should be a planned approach and be low-impact development; and
- public transport will have to be considered as well as the wider context and neighbouring approaches.

In addition it was mentioned that opportunities in leisure and marine developments, conferences, training and events should be considered.

6. Built and Natural Environment

Twenty four individuals/ organisations commented on the natural and built environment section, including GO East, the Environment Agency, Highways Agency, Suffolk County Council, Natural England and a number of Parish Councils.

Comments (Q NBE1)	Number of comments	Percentage
Agree that DC Policies should deal with SLA/ LCA	12	67
Disagree that DC Policies should deal with SLA/ LCA (Core Strategy should deal with this/ LCA should replace SLA)	2	11
Other comment	4	22

Support was expressed for Development Control Policies to consider Special Landscape Areas or Landscape Character Assessments. Other comments related to:

- The extension of the AONB;
- Landscape Character Assessments should replace Special Landscape Areas;
- The positive benefits of the built environment should be recognized; and
- Local communities should decide about landscape issues.

Comments (Q NBE2)	Number of comments	Percentage
Agree that development located in floodrisk should contribute towards mitigation	12	71
Disagree that development located in floodrisk should contribute towards mitigation	4	24
Other comment	1	6

Support was expressed for development located in floodrisk areas to contribute towards mitigation. Several comments indicated that development should never be located in floodrisk areas, or only infrastructure should be located in floodrisk areas, and some comments indicated that if the sequential test is applied then development should contribute towards mitigation else it should not contribute towards mitigation.

Comments (Q NBE3)	Number of comments	Percentage
Flood risk should be based on 10 year climate change predictions	2	11
Flood risk should be based on 25 year climate change predictions	4	22
Flood risk should be based on 50 year climate change predictions	10	56
Other comments	2	11

Support was expressed for considering flood risk based on 50 year climate change predictions. The Environment Agency indicated that this is not a subject matter for the Core Strategy as this is covered by Annex D of PPS 25 unless local circumstances indicate otherwise. Other comments related to:

- The most scientifically robust method should be followed; and
- Flexibility should be allowed for.

Comments (Q NBE4)	Number of comments	Percentage
Locate development away from sources of air pollution and encourage development in locations that minimise use of car	9	28
Only allow development that impacts on air pollution if mitigation is provided	10	31
Policy to increase air quality management and air quality	11	34
Other comments	2	6

Other comments related to:

- Monitoring should be accurate, development that cause pollution should not be allocated, local preferences should be considered; and
- Option 3 would depart from national guidance and this would create various issues.

General comments regarding the natural and built environment related to:

- The section does not cover the geology and geomorphology of the District in sufficient detail; and
- No mention is made of County Wildlife Sites, which is an omission and this should also be shown on the Environmental Map.

7. Sustainability and Climate Change

Twenty five individuals/ organisations commented on the sustainability and climate change section, including GO East, the Environment Agency, Highways Agency, Suffolk County Council, Natural England, Suffolk PCT and a number of Parish Councils.

General issues raised include:

- Local requirements for enhanced Sustainability Code Standards should focus on development areas or specific sites and should be evidence-based and viable.
- PPS Supplement: Climate Change expects Authorities to set district-wide targets for the percentage of renewable energy to be used in new developments plus tailored targets for sites where there are bigger opportunities than the council-wide target. Any requirement for on-site provision should include words to the effect that the policy will be applied flexibly and will allow carbon savings from local energy supplies to be considered towards the target.

Comments (Q SUS1)	Number of comments	Percentage
Agree should ensure that future development should be robust to withstand effects of climate change	20	95

Don't agree that should ensure that future development should be robust to withstand effects of climate change	1	5
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Comments (Q SUS1)	Number of comments	Percentage
Agree the need to ensure that future development has minimal adverse effect on climate change	18	100
Don't agree the need to ensure that future development has minimal adverse effect on climate change	0	0

Other issues raised include:

- The rural nature of the district has to be recognised;
- Retro fitting should be included;
- Development should not cause adverse effects; and
- The approach included in the Core Strategy should be supported by evidence including looking at viability and delivery.

Comments (Q SUS2)	Number of comments	Percentage
Agree that design guide should provide in depth advice on how sustainability can be integrated in design	15	75
Don't agree that design guide should provide in depth advice on how sustainability can be integrated in design	5	25

Other issues raised include:

- A design guide should not be produced if this will just replicate national policies, regulations or guidelines;
- A design guide will have limited use without any legislation to support it;
- The building industry changes all the time, has to adapt to new technologies and has to become more cost effective and a design guide will prohibit this;
- A design guide would be a benchmark; and
- A design guide has to be flexible.

Other issues that should be included in the Core Strategy are (Q SUS3):

- The impact of waste management on public health, sustainable waste and eradication of waste from points of production;
- The carbon footprints of all developments and individuals;
- Peak oil;
- Localised, transition economy;
- Climate change not given sufficient prominence;
- Guide on emission gases allowed would be beneficial and water pollution;
- Guidance to employers on ways to mitigate/ reduce climate change factors;

Comments (Q SUS4)	Number of comments	Percentage
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Use CSH/ BREEAM for monitoring and target setting	15	88
Don't use CSH/ BREEAM for monitoring or target setting	1	6
Other comments	1	6

Other issues raised include:

- A zero waste policy for all development should be set;
- There should still be some flexibility; and
- Local factors should also be taken into account.

Main issues raised regarding how planning should address sustainability include (Q SUS5):

- Development has to be sustainable and therefore balancing social, economic and environmental effects;
- The merits of each case has to be considered;
- The planning system should deliver an integrated approach defining the need for new development and looking at ways of managing demand and promoting alternative solutions;
- All development should positively contribute to climate change reductions;
- In addition to the provision of lower energy the community has to be educated regarding a more sustainable way of life;
- Encourage public transport, design innovation and need for travel; and
- The embodied energy of buildings has to be as low as possible and local resources should be utilized, operation energy of affordable housing has to be as low as possible.

Residential Development (Q SUS6 – SUS7)

Options (Q SUS6)	No of comments	Percentage
National minimum CSH most appropriate	5	45
CSH required: Level 3 by 2010, Level 4 by 2012, Level 6 by 2015	2	19
CSH required: Another option above national standards	4	36

Other issues raised include:

- Information on viability, feasibility and benefits are required;
- Impacts on housing delivery should be considered;
- Follow the CSH to avoid confusion in the construction industry with higher standards at particular sites where this can be achieved. Achieving energy efficiency standards for higher levels of the CSH on small developments may be unviable currently but legislation will prevail to allow offsite mitigation;
- Buildings and communities should be self sufficient; and
- A minimum CSH should be adopted.

Options (Q SUS7)	No of comments	Percentage
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Code for Sustainable Homes should apply to all new build, conversions, redevelopments and extensions more than 1 room	7	50
Code for Sustainable Homes should apply to all development 1 dwelling and above	3	21
Code for Sustainable Homes should apply to all development 3 dwellings and above	0	0
Code for Sustainable Homes should apply to another level	4	29

Other issues raised include:

- Costs and benefits will have to be balanced; and
- Viability of developments will have to be considered.

Non-Residential Development (Q SUS8 – SUS9)

Options (Q SUS8)	No of comments	Percentage
Development should be required to achieve national minimum standards	3	20
Development should be required to achieve BREEAM Good	3	20
Development should be required to achieve BREEAM Very Good	2	13
Development should be required to achieve BREAAM Excellent	3	20
Development should be required to achieve another standard	4	27

Other issues raised include:

- The impact on delivery and economic growth will have to be considered;
- Certain areas or sites may be able to provide higher standards;
- The costs, benefits and viability will have to be considered;
- Dutch building standards should be considered; and
- These standards should be comparable with residential buildings.

Options (Q SUS9)	No of comments	Percentage
Sustainable Construction requirements should apply to all development	8	50
Sustainable Construction requirements should apply to development over 0.1ha or 100 sq m	2	13
Sustainable Construction requirements should apply to development over 1 ha or 1000 sq m	2	13
Sustainable Construction requirements should apply to other threshold	4	25

Other issues raised include:

- The costs and benefits (viability and feasibility) of options have to be considered;
- Flexibility should apply to on-site renewable energy provision.

Renewable Energy (Q SUS10 – SUS12)

Options (Q SUS10)	No of comments	Percentage
No requirement for developments to provide some level of renewable energy	2	15
National or regional renewable energy provision requirement	8	62
Another level should be set in terms of providing renewable energy	3	23

Other issues raised include:

- The impact on delivery and economic growth will have to be considered;
- Certain areas or sites may be able to provide higher standards;
- The target should be for renewable energy as a reduction in CO2 emissions.

Options (Q SUS11)	No of comments	Percentage
No requirement for renewable energy to come from decentralised sources	3	30
A requirement for renewable energy to come from 25% decentralised sources	3	30
Another threshold should be set for the requirement for renewable energy to come from decentralised sources	4	40

Other issues raised include:

- The current RSS policy indicates that decentralized sources and renewable energy should be considered;
- Certain areas or sites may be able to provide higher standards; and
- The costs, benefits and viability will have to be considered (also for decentralized sources).

Options (Q SUS12)	No of comments	Percentage
All thresholds should apply to requirements for renewable energy	5	45
Above 1 dwelling or 100 sq m non-residential floorspace should provide for renewable energy	1	9
Another thresholds should be set to apply to requirements for renewable energy	5	45

Other issues raised include:

- This should be a robust strategy not arbitrary thresholds and percentages;
- The costs, benefits and viability will have to be considered; and
- The development of renewable energy should be encouraged and promoted.

8. Retail and Town Centres

Twenty one individuals/ organisations commented on the retail and town centres section, including GO East, Suffolk County Council, Suffolk Constabulary, Suffolk Primary Care Trust, Braintree District Council and a number of Parish Councils.

Comments (Q R1)	Number of comments	Percentage
Core Strategy address how to protect and enhance viability and vitality of town centres, retain shopping facilities in local and rural centres	16	89
Other comments	2	11

Other issues raised include:

- A clear retail strategy for the district should be established in the Core strategy including broad amounts and distribution of retail floorspace to be accommodated in the District. Expected options relating to the amount/ distribution of retail growth in Sudbury and existing allocations should be reviewed through the LDF process where still necessary/ the most appropriate.
- Vitality and viability should be promoted through other mechanisms as well, the impact of national companies should be considered, there is a need to provide incentives to support local shops, sustainability should be considered, strategies should include minimising fear of crime and disorder and car parking should remain free.

Comments (Q R2)	Number of comments	Percentage
Define retail hierarchy	3	16
Set out aspects to promote and enhance vitality and viability in town centres and rural centres	5	26
Retail strategy for Sudbury and Hadleigh	6	32
Combination of Options/ Alternative option	4	21
Other comments	1	5

Other issues raised include:

- Sufficient details should be provided;
- Leisure, allotments and smaller rural centres should be provided;
- A pro-active approach should be adopted that goes beyond Development Control;
- A more flexible approach should be adopted to additional retail space;
- Aspects to promote viability and viability could include:
 - creating gateways and attractive street design and high quality public facilities; providing appropriate car parking and make public transport a more attractive option and safeguarding key attractions and work with these to ensure they remain; encourage diversity, distinctive markets, regular events including hospitality and services.
 - Including retail, leisure and education
 - Small retail not supermarkets
 - Include range of complimentary services such as community facilities, service facilities, etc.

9. Social and Community Infrastructure

Twenty five individuals/ organisations commented on the social and community infrastructure section, including GO East, Natural England, Environment Agency, Suffolk Constabulary, Suffolk Primary Care Trust, Ipswich NHS Hospital, Suffolk County Council, Sport England (East) and a number of Parish Councils.

Comments (Q SCI1)	Number of comments	Percentage
Crime and disorder should be addressed through a Town Centre Strategy	6	43
Crime and disorder should be addressed through DPDs	2	14
Crime and disorder should not be addressed through planning/ no comments	6	43

Other issues raised included:

- DPDs should be flexible;
- Licensing legislation should deal with this;
- A coherent approach should be formulated; and
- Strategic standards and principles should be included in a retail strategy.

Comments (Q SCI2)	Number of comments	Percentage
Green Infrastructure should be address through the Core Strategy	15	63
Green Infrastructure should be address through the DPDs	4	17
Planning should not address Green Infrastructure/ No comment	5	21

Other issues raised included:

- The Core Strategy should set out the vision and delivery framework for the enhancement of the natural environment and more detailed policies and guidance should be provided by other DPDs as appropriate;
- Each area will have its own potential and problems and green infrastructure should be addressed on an area basis;
- Access, recreation and biodiversity should be given high priority; green infrastructure should include the increased provision of allotments and landscaping; public access to the natural and historic environment, open space (formal and informal), green corridors, sport pitches, visual amenity and other green infrastructure;
- Green infrastructure provision in Babergh and access to green infrastructure is poor; it has potential to deliver huge benefits for the AONB/ district; would ensure delivery of the Suffolk Coast and Heaths Management Plan and the Haven Gateway Green Infrastructure Strategy; and would afford opportunities for water features as part of sustainable drainage systems to serve wildlife habitats;
- Green infrastructure is key for attracting tourists, for healthy and sustainable communities and a healthy and attractive environment; and

- Green infrastructure should be addressed in a consistent way across authority boundaries in Suffolk.

Comments (Q SCI3)	Number of comments	Percentage
All facilities are of equal importance	8	35
Some facilities are of greater importance	6	26
Determine on case-by-case basis; other comments	9	39

Other issues raised included:

- Particular infrastructure mentioned in comments included sheltered homes and day centres; schools and educational facilities, shops, meeting places, post offices, police resources particularly when large developments occur, open space and health facilities; and
- Local needs should determine priorities or that this should be determined on a case-by-case basis linked to the development that occurs and to viability.

Comments (Q SCI4)	Number of comments	Percentage
A threshold should be set for the type and size of development that should contribute to social and community infrastructure	6	25
Social and community infrastructure should be sought and secured through Section 106 Agreements on a case-by-case basis	10	42
Combination of thresholds and case-by-case	5	20
Other	3	13

Other issues raised included:

- Viability has to be considered;
- Thresholds should be introduced on a sliding scale;
- Thresholds should be needs based; and
- Introducing thresholds would prejudice CIL and would be inflexible and not provide the ability of specific infrastructure to be required from certain developments.

Different approaches were proposed to determine thresholds including that it should be sought for each new dwelling; it should be sought for 15 dwellings or more and for commercial development of a 1000 m²; and police infrastructure should be sought for 50 dwellings or more or for 2500 m² or more.

Comments (Q SCI5)	Number of comments	Percentage
Core Strategy should make specific provision for social and community infrastructure	11	55
Development Control Policies should set out provision for social and community infrastructure	6	30
Combination of Core Strategy and DC Policies	1	5

No comments	2	10
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Other issues raised included:

- Specific community projects should be included,
- Green infrastructure should be included,
- The Core Strategy should have a broad policy and principles relating to the provision of social and community infrastructure;
- Local Priorities should be implemented;
- The Core Strategy should make provision for seeking S106 agreements; and
- There is a need for cross boundary coordination in terms of the provision of green infrastructure particularly around the Ipswich Borough boundary.

Other particular social infrastructure mentioned included a food store, public open space, a sports hall and youth clubs, affordable housing, health care facilities and a health care strategy for Sudbury;

10. Physical Infrastructure

Twenty nine individuals/ organisations commented on the physical infrastructure section, including GO East, National Grid, Anglian Water Services Ltd, Highways Agency, Environment Agency, Suffolk Constabulary, Suffolk County Council, Tendring District Council and a number of Parish Councils.

Comments (Q INF1)	Number of comments	Percentage
Core Strategy should address infrastructure provision	21	91
Core Strategy should not address infrastructure provision	2	9

Other issues raised included:

- There is a need for a bypass at Sudbury/ Great Cornard; a hospital in Sudbury, a railway halt in Great Cornard; the B1508 should be upgraded if development are proposed in this area;
- The Water Cycle Study Stage 2 and the Environment Agency Anglian River Basin Management Plan should be taken into account;
- Infrastructure impact assessments should be utilised and the impacts on police resources should be required; and
- The impact of strategic growth sites on infrastructure should be considered as well as viability if new infrastructure is required.

Comments (Q INF2)	Number of comments	Percentage
Section 106 Agreements on case-by-case basis	3	13
Standardised local tariff approach	2	9
Make provision for large scale infrastructure requirements	0	0
Funding national government	2	9
Combination of options	12	52

No comment	4	17
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Other issues raised included:

- The lack of sufficient infrastructure is the most important problem in Babergh and it should be considered in all developments;
- There is a need for a Sudbury/ Great Cornard bypass and a Sudbury Hospital;
- The impact of HGVs on minor roads has to be considered including in the Dedham Vale to Leavenheath area;
- Development without infrastructure will reduce the quality of the AONB and the wider area; and
- Viability and delivery is an important consideration.

In terms of the thresholds to be applied in relation to a standardised approach few responses were received and some of these indicated that this will have to be based on a needs assessment or a case-by-case basis. In addition it was indicated that more evidence would be required in terms of the impacts on viability of development. Particular suggestions in terms of thresholds included that this should apply to all development; it should be based on a sliding scale from 2-20 dwellings and the thresholds should be based on 50 dwellings and 2500 m2 commercial floorspace.

Comments on the strategic/ large scale infrastructure required included a need for waste management; waste treatment plans; water abstraction plans; Sudbury bypass; Sudbury Hospital; upgrading of Sewerage Treatment Works; water mains and sewerage (Sroughton), local waste transfer stations; waste recycling; roads; open space; commercial development; schools; medical centre; community open areas; community centres; parking including at Sudbury and addressing road infrastructure concerns at Sroughton and Copdock/ Washbrook.

11. General Comments, Introduction, Monitoring and Implementation

Twenty seven individuals/ organisations submitted general comments, including GO East, EERA, The Coal Authority, EEDA, St Edmundsbury Borough Council, Felixstowe Town Council, Tendring District Council and a number of Town/ Parish Councils. Other issues raised included:

- More evidence base is required in terms of the environmental characteristics of the area and historic environment;
- Parts of the document would be more appropriate in DC Policies;
- A Key Diagram should be included;
- Outcomes of the SFRA should be progressed through the Core Strategy
- Consultations should be improved;
- The document has got to be sufficiently flexible and take into account the economic recession and other changing factors and information
- Design policies should be included, Shotley Peninsula not mentioned, more emphasis on AONB. Tourism, leisure facilities could be emphasised.
- Include reference to Babergh's role in terms of Haven Gateway and wider region; RES and Haven Gateway IDP.
- Impact of growth on environment, economy and infrastructure in St Edmundsbury will have to be considered.
- The Core Strategy should include supporting principle of enabling development which will secure the remediation and redevelopment of brownfield/ contaminated sites; and

- Sustainability of the district should be addressed.



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