

**BABERGH DISTRICT COUNCIL**

**FROM:** Acting Head of Planning Policy and  
Economic Development

**REPORT NUMBER** **E314**

**TO:** STRATEGY COMMITTEE

**DATE OF MEETING** 30 March 2006

**BABERGH LOCAL PLAN (ALTERATION NO. 2) POST INQUIRY MODIFICATIONS –  
PROPOSED RESPONSES**

1. **SUMMARY**

- 1.1 Preparation of the emerging Local Plan commenced in 1998 and a Local Plan Inquiry was held from late 2004 to early 2005. The Inspector's report was published in November 2005. The most recent stage was the issue of Post Inquiry Modifications. This report informs Members of the outcome of the recent public consultation exercise carried out on the current changes (Post Inquiry Modifications) proposed to the Council's emerging Local Plan. This period ran from 18<sup>th</sup> January until 1<sup>st</sup> March 2006 inclusive. A significant level of response was received in the form of representations. It is considered that this level of response was increased considerably by very substantial efforts to publicise the Plan in general and to invite responses, plus the extent of the changes recently proposed. In particular, meetings with Town and Parish Councils most affected by current changes proved effective as an opportunity for officers to explain the proposals and to facilitate a response. This paper summarises the results of this consultation process and recommends appropriate responses in terms of moving the Plan towards its final adoption. This includes a relatively small number of minor changes.

2. **RECOMMENDATIONS TO COUNCIL**

- 2.1 That the responses to the recent public consultation exercise be noted.
- 2.2 That the proposed detailed responses on each issue and to each representation, set out in Appendix C, and the proposed non substantive changes at Appendix B, be agreed.
- 2.3 That the Acting Head of Planning Policy and Economic Development be granted authority to make any necessary minor changes, revisions and edits to correct any remaining errors, effect any updates, ensure consistency and aid comprehension of the Plan.
- 2.4 That a further Public Local Inquiry into the objections raised in response should not be held.
- 2.5 That the adoption of the Local Plan be pursued as soon as possible following adherence to the requisite formal adoption procedures. The proposed date of adoption will form a recommendation to Council (on 11<sup>th</sup> April).

3. **FINANCIAL IMPLICATIONS**

- 3.1 This report does not raise financial implications.

#### 4. KEY INFORMATION

##### Recent Public Consultation Exercise

4.1 Following the Strategy Committee and full Council meetings of November / December last year it was agreed that officers would embark upon an extensive programme of additional public consultation focusing mainly on the areas most affected by current proposed changes. The programme aimed to ensure that:

- Officers could publicise the proposed changes and explain the reasoning behind the Inspector's recommendations giving rise to these
- Officers could listen and respond to questions arising in response
- Officers could also bring other Parish and Town Council representatives and the public up-to-date on the Local Plan in other areas not affected by those changes
- Officers could publicise and explain the public consultation process and how to get involved
- Officers could explain the process of how the Local Plan could proceed from here on

##### Public Consultation Events

Tuesday 10 Jan **Great Cornard** Parish Council

Tuesday 17 Jan **Wherstead** Parish Council

Wednesday 18 Jan **Great Cornard** *Public Meeting*

Thursday 2 Feb Babergh East Local Strategic Partnership meeting

Tuesday 7 Feb **Glemsford** Parish Council

Wednesday 8 Feb **Babergh East Parishes**

Thursday 9 Feb **Babergh West Parishes**

Tuesday 14 Feb **Sudbury** Town Council

Friday 17 February West Suffolk Local Strategic Partnership meeting

4.2 Overall, attendance at the events programme was very high, reflecting the level of interest in local planning issues. This can be expected to be reflected in the volume of representation received.

##### Outcome of Public Consultation

4.3 The recent formal public consultation exercise ended on 1<sup>st</sup> March 2006. This received a significant level of response. The tables attached at Appendix A set out the numbers of representations received and the matters / sites that were subject to these representations. For a full listing of representations, a schedule has been produced and attached as Appendix C, including a précis of the points made, together with officers' proposed responses. This is available for inspection at Planning reception, Babergh HQ, for the benefit of the public. The full, original text of all representations is also available for inspection by viewing the files compiled to contain these, which are separated by issue / subject matter (held at Planning reception, Babergh HQ). A substantial number of invalid representations was also received. These were primarily a result of comments made that did not relate to the changes currently proposed and respondents duplicating their objections to the land east of Carsons Drive site (Great Cornard) on forms specifying the Special Landscape Areas policy, which are not relevant to the Special Landscape Areas policy changes.

## Background and Procedures: Framework for Decisions

- 4.4 The first point to note and this cannot be stressed strongly enough, is that any decisions made must be made purely on planning considerations. Accordingly, all representations received and any other information that has been brought to officers' attention, have been considered only in this context. Public consultation exercises often tend to invoke a high level of response but the multitude of matters raised in response must be considered carefully. Firstly an assessment is made in relation to whether they are valid at all (see paragraph 4.3 above); secondly an assessment of whether they relate to planning issues; and thirdly there is a need to examine whether they raise points that can be factually substantiated by the available evidence and any implications arising from such points.

### Consideration: the need for an adopted Local Plan

- 4.5 The benefits to the district of an up-to-date, adopted Local Plan are considerable in number, scope and very substantial in effect. Consideration must also encompass the opposite case, that is, the consequences of having no up-to-date, adopted Local Plan. The old Plan, the First Alteration, is over 10 years old and becoming increasingly obsolete. Most of its land allocations have been taken up, so it offers little opportunity to meet the district's development needs. Important aspects of it, particularly many development control policies, have already been superseded by more recent developments, such as newer national planning guidance, with which Alteration No. 1 often no longer complies. As time goes on, this obsolescence increases steadily, with the Plan becoming less useful, relevant and applicable and this helps explain why it is highly desirable to adopt a new Plan as soon as possible.
- 4.6 The new Plan offers a huge, strategic opportunity to the district. It is also a means of delivery of the Council's key corporate objectives for the benefit of the district, particularly affordable housing, and a safe, clean and sustainable environment. However, there may be instances where individual elements do not accord with the aspirations or preferences of all but there is a strong case for a pragmatic approach, given the need to promote the interests of the whole district over a considerable period of time. Not least of such considerations is the chance to put in place a comprehensive suite of policies for Development Committee to use as a firm basis for controlling and steering the form of developments coming forward in a district characterised by persistently strong development pressures. In some cases, these pressures will involve major sites that can have a great potential impact on their localities. Section 54A of the Town and Country Planning Act 1990 requires decisions on planning applications to be made in accordance with the Development Plan. The absence of a Local Plan would therefore remove most of the basis for development control decisions. These policies and the overall Plan are commended to Members.
- 4.7 The principles on which the planning system operates need to be set out. Ours is a plan-led system and relies upon local planning authorities having Development Plans in place. PPG12 (Development Plans) states that 'The plan-led system can only be successful and command public confidence if plans are in place and are kept up-to-date.' The consideration of appropriate locations for any substantial development is thus best done through the Local Plan process. This allows these issues to be publicised and debated in advance of detailed planning applications, where the clock is effectively ticking and the Council has 13 weeks in which to determine the application. All development proposals in the Plan will, in any case, have to go through the planning application process, giving a further opportunity for local comment and objections, a second opportunity that would not be allowed if such proposals were not Plan-led and instead just came forward as planning applications bypassing the Local Plan process. As PPG12 (paragraph 3.12) states: 'Site specific proposals in Local Plans provide a positive lead for development and help create certainty, both for developers and the local community.'

4.8 The Babergh Local Plan (Alteration No. 2) has reached a very advanced stage of preparation and has been improved and refined throughout its development. The Council overcame the greatest hurdle in producing a Plan - the public inquiry. In terms of process, there is now a vital need to steer the Local Plan towards adoption as soon as possible. Members are respectfully reminded that there is effectively a deadline for adoption of 21 July 2006, with the European Strategic Environmental Assessment Directive ('the SEA directive') coming into effect on 22<sup>nd</sup> July. This would render adoption of the emerging Plan extremely difficult and may even be infeasible. Attempting to adopt the Plan after 21st July would require a *retrospective* SEA to be applied (going back over the Plan-making process from over 7 years ago). This is not considered realistically achievable in any robust manner that would satisfy the regulatory requirements and stand up to scrutiny. The fundamental aims of the SEA / SA processes as they are now prescribed are to ensure that the process is iterative and shapes a Plan as it evolves. Applying these processes retrospectively would therefore appear meaningless.

4.9 The following points in response are also emphasised:

- This Plan has already been over 7 years in development. This is considered far too long to serve the planning interests of the district and in meeting its needs for both development requirements and its effective protection.
- The best interests of the district would not be served by a failure to have an adopted Local Plan in place. The absence of an up-to-date Plan is likely to lead to a glut of planning applications coming forward in many parts of the district, including those areas already considered for development in this Plan. This would create a less Plan-led context for the district, whilst simultaneously undermining the Council's ability to control and steer these development proposals effectively. Members are reminded that well over 100 'Omission' sites (alternative sites for development) were put forward by objectors in this round of Plan-making alone, the vast majority of which have been fended off. The absence of an adopted Plan with allocated sites in it could rekindle the aspirations of those promoting these sites.

4.10 Officers have carefully considered and assessed the planning merits of all representations. This report highlights the areas of objection and Members are referred to Appendix C for full particulars.

#### Consideration of the Main Issues raised

##### *Land east of Carsons Drive, Great Cornard*

4.11 In such instances, it is usually site-specific development issues that attract most interest and concern. Accordingly, the single issue here that has provoked most response and publicity is the proposal for residential development on land to the east of Carsons Drive, Great Cornard.

4.12 Whilst officers are mindful of the level of public response to the consultation exercise in general and the above proposal in particular, large-scale opposition, in itself, is not a valid factor to which significant weight should be attached. Decisions on planning issues must be made on planning grounds. PPS1 (The Planning System: General Principles) states at paragraph 27 that: 'When determining planning applications they [the elected members] must take into account planning considerations only. This can include views expressed on relevant planning matters. However, local opposition or support for a proposal is not in itself a ground for refusing or granting planning permission, unless it is founded on valid planning reasons.' Whilst this guidance is written in reference to planning applications, the same approach applies in the consideration of Local Plan issues and land allocations.

- 4.13 The principal objections to this site concern the Gainsborough painting heritage issues. This point needs to be examined. Firstly, it is considered that this does not clearly represent a material planning issue in principle, that is, the question of whether or not the land involved appeared in any of the two Gainsborough paintings cited. Secondly, leaving aside the questions of status of this matter and the appropriate weight to be given to it, the available evidence is inconclusive on the matter. This is unsurprising given the need for reliance on the opinion of historical art expertise having to apply a modern day interpretation of these paintings that portray landscapes that have almost inevitably changed considerably over the course of some 200 – 250 years. Accordingly, opinions seem to vary considerably. As a result, it is recommended that this matter is not one of the key planning issues involved and little weight can be afforded to it.
- 4.14 Partly as a result of the above matters, landscape issues feature prominently in objections to this proposal. The primary concern relates to the proposed Special Landscape Area (SLA) designation that has been sought for this land. In order to avoid confusion, it is necessary to relate the chronology of events. A proposal first arose to extend the SLA designation that already covered adjacent land surrounding Great Cornard in the first draft Plan of 2001. This extension would complete the surrounding of Great Cornard entirely by land under SLA designation. The proposed designation of the extension was objected to and the objections never withdrawn. There are no identifiable public representations to set out and explain this request for an SLA extension (it is believed to have been put forward through the then Local Plan Members' Task Group). Prior to this, two 'Omission site' proposals for the land to the east of Carsons Drive had been put to the Council, one of which includes largely the same area proposed for housing as that considered by the Council now. The latter dates from February 1999. Thus, it appears that the development proposal pre-dates the SLA extension proposal and rather than the development supplanting the SLA, it seems more likely that the proposed SLA was a response to the proposed development.
- 4.15 The decision before the (Local Plan Inquiry) Inspector then was whether to designate the land as a new SLA or whether it was appropriate for development. Clearly, he opted for the latter, although he considered that the land beyond the development was suitable for designation as a further SLA. The new proposal is considered to provide a firm, clear delineation between the two and the area currently proposed as this new SLA covers 155.4 ha. The part of it that the Inspector recommends **not to designate** (as opposed to 'delete') represents some 4.4 ha. of it (plus a part of the open space area within the new ridgeline planting) that is some 3%. Accordingly around 97% is recommended for designation. Prior to the Inquiry, it is clear that a very substantial amount of research was conducted by the site's proponents to evaluate landscape impacts and the scheme was designed to contain the development within the 45 metre land contour line (this is the land level at which the alternative Shawlands Avenue proposal begins and at which its access would enter the site). The Carsons Drive site is gently rising and contained by a clear, prominent ridgeline, preventing visibility from long views to the east. The large overall urban area of Great Cornard immediately west (towards The Stour) is generally flat and the land rises very gently eastwards towards this site. New planting on the ridgeline would provide effective screening.
- 4.16 It must be recognised that for occupiers of houses in Carsons Drive and Sheepshead Hill, a view onto a field is preferable to a view onto new housing. Similarly, this applies to walkers, etc. using the local rights of way network (although it would only affect that part of the network closest to Great Cornard). In the immediate locality then, the views of these parties would be adversely affected. Views of the development from Abbas Hall would be prevented by the existing landscape ridge and the new ridgeline woodland planting (belt to be between 20 and 30 metres thick). Clearly, the local planning authority can also insist upon a comprehensive landscaping scheme to require considerable new planting within and around the development. Existing trees and other vegetation on the western boundary (against Carsons Drive) will be retained and the existing trees on the southern part of this boundary already enjoy protection by a Tree Preservation Order (TPO). There is no request to remove these trees and no identifiable purpose in doing so.

Consequently Cornard Wood (the subject of the Gainsborough painting) would not be destroyed or adversely affected by this proposal. All of the site is currently farmland, under arable cultivation and not covered by any woodland tracts.

- 4.17 English Heritage (EH) registered an objection, citing a potentially significant detrimental impact on the historic environment, although this states that the site lies to the east of Abbas Hall, rather than to the west, where the site actually is. In particular, EH suggest that the landscape setting of this listed building would be adversely affected. EH also take issue with the proposed planting of trees on the ridgeline. This view is contrary to the Inspector's view, as he considered the substantial volume of landscape evidence carefully, assessed the site by a thorough visit for himself and concluded that with effective ridgeline planting both the view from and the setting of Abbas Hall and Great Cornard would be enhanced. He also concluded that the historic setting of Abbas Hall would not be affected by not including the slopes to the west of the ridgeline within an SLA and by its development. Officers' sites visits have confirmed this opinion, as the landscape ridge would enclose the new development. Officers consider that the proposals have been sensitively designed to fit well into the landscape, being located to nestle within areas bounded by the Sheepshead Hill development to its north and Carsons Drive to its west. The land levels and proposed controls on the height of development already planned by the site's developer, allied to the new planting, will be sufficient to deal with any visual impact.
- 4.18 The EH objection to new tree planting suggests a desire to prevent any form of landscape change when this has clearly been evolving for hundreds of years, through such measures as the Enclosures of farmland in recent centuries. The proposals present an opportunity to create a far better planned urban edge than currently exists and standards of residential design and its layout have improved greatly since the adjacent development was built. The inclusion of new tree planting and other landscaping through a comprehensive scheme can bring other environmental benefits. In relation to the EH comments on archaeology, there is no reason why full archaeological investigation cannot be required and indeed the proposed policy already requires investigation. Road widening of the C732, as EH warn against, is not proposed as a suitable option in the location they mention, uphill of the site where the tree crowns meet above the road. EH comments refer to 'the existing SLA designation' whereas no designation formally applies. The draft SLA extension proposal can be afforded little weight or status, as it drew objections that were not withdrawn and were upheld by the Inspector.
- 4.19 The matter identified by officers as the most valid planning issue in relation to this site's development is that of highways. This is reflected by an outstanding objection from the Transport authority (Suffolk County Council - SCC). The nature of this objection needs further explanation. This objection is not an objection *in principle* and this is significant. To summarize the differing positions of the developer and the Transport authority on this matter, they disagreed in their evidence at the Local Plan Inquiry, the crux of which was the extent of traffic generated that would use Cornard Tye Road (C732) and accordingly, the measures that would be necessary to address this. The Inspector noted there being no inherent highways objection in principle and concluded that appropriate measures could be addressed, required and controlled at the planning application stage (the use of planning conditions and / or a legal agreement being appropriate).
- 4.20 Use of the C732 for local access purposes (linking Cornard Tye with Great Cornard) would not be sufficient to generate problematic traffic volumes. However, the use of the C732 as a through route (by either existing or new residents) should be curtailed. Officers agree that the potential for any significant traffic generation that could adversely affect the C732 needs to be addressed. Some localized measures have already been proposed and offered by the developer, which concentrate on making the use of the C732 westwards through Great Cornard, via Shawlands Avenue more attractive. It is considered that these measures are appropriate and should form part of the solution. As for the C732 eastwards, the use of conventional highways engineering solutions as sought by SCC is not advocated here, as it is considered that measures like road

widening and therefore increasing its traffic capacity would merely increase the use of the road by motorized traffic. Accordingly, it is proposed that a more innovative, environmentally friendly and sustainable traffic solution is sought. The detail of the most appropriate solution need not be finalized now but the following potential measures are options worthy of further consideration. The best solution(s) should be assessed, promoted and the cost borne by the developer:

- Traffic calming measures, such as road width restrictions, to prevent use by large / heavy vehicles and to slow smaller vehicles (such measures already used on rural road approaches to Hadleigh)
- Traffic Order to achieve road closure midway along the C732, allowing for continued access but no through traffic. A road width restriction could be used to allow continued through movement for pedestrians, cyclists, horse riders and motorcyclists
- Possible establishment of a 'Quiet Lane' route as used effectively elsewhere, such as Norfolk and Cheshire (or a similar approach)
- Some combination of these (or other) measures

4.21 Overall, the resolution of the highways matters will, of course, remain necessary to the satisfaction of the local planning authority (LPA), in conjunction with the Transport authority and the LPA retains the ability to both control and if necessary prevent, the scheme from proceeding, through its development control powers and the grant (or otherwise) of planning permission. At worst, this is deemed likely to introduce a time phasing requirement for the site, as it may take a while to identify the most appropriate solution and then secure the measures necessary to promote it. Also, the LPA prefers to approach such matters by seeking the resolution of such issues, preferably before a planning application is submitted. The introduction of a possible phasing constraint to this proposal is not considered unduly problematic. Numerous other issues were cited concerning this site allocation proposal, none of which raise substantive planning issues that either have not been considered and addressed already or that cannot be resolved in a relatively straightforward way. In conclusion, it is considered that the highways point is the only substantive planning issue and this is capable of remedy at the more detailed, planning application stage.

4.22 Against this the proposal offers some substantial benefits. Foremost amongst these is that of addressing housing need. National planning policy, in PPG3: Housing, states in its opening sentence: 'The Government intends that everyone should have the opportunity of a decent home.' Amongst Babergh's five top agreed priorities for the district sits Priority 2: 'Increase the supply of housing that local people can afford to rent or buy'. Not only is there a substantial overall housing need for the district but also a need to meet the district's housing allocation figures as set out in the Suffolk Structure Plan 2001 (these figures commencing from 1996 and proposed until 2016). In Policy CS3 the latter states that through locations 'in or adjoining towns'.. 'provision for significant housing development will also be made at Lowestoft, Stowmarket, Sudbury and Haverhill.' Sudbury / Great Cornard is thus the only urban area of Babergh identified for significant housing development (and employment development under Policy CS2), other than that already accounted for by previous completions and planning permissions already granted. Babergh's other urban areas: Ipswich fringe and Hadleigh have received significant levels of residential development since 1996. The figures show the following outline of previous trends:

In terms of single areas of growth, the order of the urban areas (by greatest development level first) is:

1. Ipswich Fringe: 663
2. Hadleigh: 494
3. Sudbury: 456
4. Great Cornard: 141

If Sudbury and Great Cornard are combined it is:

1. Ipswich Fringe: 663
2. Sudbury / Great Cornard: 597
3. Hadleigh: 494

- 4.23 These data refute the suggestion that Great Cornard, in particular, has borne the brunt of previous development. Whilst the majority of future growth is earmarked for Sudbury / Great Cornard (and Chilton) this is entirely in line with the strategic planning policy framework for Babergh.
- 4.24 Requirements for affordable housing in the locality are very substantial, with Sudbury / Great Cornard being within the district's areas of highest identified housing need. This proposal could help deliver a significant number of new homes to help address this pressing need. At a rate of 35%, this would equate to some 59-60 affordable homes. Great Cornard alone currently has 430 households / individuals listed on its housing register (excluding those already housed who want transfers). Whilst, as alluded to above, there are significant developments 'in the development pipeline' for the area, these continue to show a common characteristic of taking an extremely long time to obtain planning permission and to be built out. The recent development flow has thus served to alleviate very little of the area's pressing housing needs.
- 4.25 The second point is the provision of new public open space, with 4.5 hectares (11.25 acres) being offered. Some of this would be situated to provide for the new housing and could accommodate child's play and some formal needs if required. The remainder is earmarked for more natural / less formal public open space, together with improved wildlife habitat. There is, therefore, the potential for ecological enhancement of what is currently cultivated arable farmland, usually with limited value for wildlife, particularly when not farmed organically. In addition, there is scope to increase local tree cover significantly, with some 3 hectares planned as a new woodland planting belt. The existing vegetative screen skirting the houses in Carsons Drive could be thickened and enhanced and the main ridgeline woodland planting belt would provide a new softer urban edge, together with new wildlife habitat, particularly if designed to incorporate ecological principles.
- 4.26 In conclusion, a balance must be struck between the one identified tangible disbenefit of the proposals, that is, highways issues / traffic generation, against the benefits. Traffic growth in itself cannot be prevented, as new occupiers will inevitably own and use cars, so local roads would be busier, to the frustration of local road users. This is acknowledged to be the case with any new residential development. However, it is considered that satisfactory mitigation measures are possible to address and ameliorate this and these could be controlled to ensure delivery when needed. Against this, it is considered that the provision of new homes, particularly affordable homes, within the part of the district by far the most well suited to, and sustainable for, new development, in line with prevailing policy at all levels, should carry greater weight. Deletion of this site would also mean that the district is far more likely to under-provide against its agreed housing allocation figure (under the current Structure Plan). This proposal has also been conceived, planned and designed very sensitively. The matter of the Carsons Drive allocation has been reconsidered carefully in the light of all representations and views expressed, further research and any other information emerging. However, on balance, this is still considered an appropriate land allocation to make and the best option available to meet the needs of the area. The allocation is therefore supported and recommended to Members.

#### *Land off Shawlands Avenue*

- 4.27 Turning to the Shawlands Avenue site, representations have been received seeking the reinstatement of this proposal site. These have not raised any new evidence (indicating any kind of site based research) other than that disagreeing with the Inspector's reasoning and conclusions and points seeking to extol its virtues. The arguments mooted are not accepted and in the

reasoning above, including inter alia evidence on comparative land levels, it is clear that this proposal presents greater adverse impacts and offers less benefits. In terms of visual impact, the relative cases present a clear distinction. The Shawlands Avenue site rises sharply beyond the existing urban edge, which is currently well-defined in that area. The slope covered by the proposed development area rises steeply and could allow for new housing, with its base at a height of 60 metres plus. This can be expected to be highly visible from a considerable distance beyond, with the land falling to the south-west. An ecological survey carried out in 2003 recorded the site as being of medium conservation value, it is not under arable cultivation and its grassland has some intrinsic ecological value. The site also currently has value for ecological connectivity.

- 4.28 This proposal would also require some highways improvement measures to render it acceptable. The relocation of an existing play area would be necessary. There are numerous very valuable trees on the site as well, including rare Black Poplars. It is anticipated that these could be retained within a layout, making a separation of development necessary to avoid root damage. The trees covering the entrance to the proposed site are protected by a collective Tree Preservation Order and these are very valuable, good, healthy, large and mature specimens, including several species of native, broadleaved trees. Clearly, the punching of a relatively substantial hole through these trees to create a new access point would be necessary, and the crossing of a ditch, on one bank of which these trees have parts of their root networks. This would require an engineering solution to cross the ditch and make good the substantial difference in levels at a satisfactory new gradient. Recent advice from the Council's Arboricultural Officer warns that removing some of these trees would risk a threat to their collective integrity, as such tree groups can be interdependent, with individual trees relying upon each other for mutual support. This group of trees is held as very significant locally for their overall value.
- 4.29 Against these points, this proposal would offer 80 new dwellings, with a commensurate affordable housing element (28 dwellings possible) and the opportunity to improve the current play area. This proposal appears to have originated around benefits focusing on provision of 6.5 hectares of community woodland, forming part of a country park around Great Cornard's eastern edge, plus a further (0.5 hectare) piece of land for public open space. The existing play area is proposed for replacement by a new landscaped area (with public access) although this would have to be balanced against loss of important trees in the same vicinity. This site proposal has been reconsidered carefully and all the evidence reassessed. The identified adverse impacts of this proposal are still considered to outweigh the benefits and the Inspector's recommendations not to allocate it are deemed to remain valid, with the absence of any altered circumstances since then.
- 4.30 Representations objecting to this site's deletion can generally be attributed to the site's development agent / proponent (and associates) and those who propose it as a preferable alternative to the Carsons Drive proposal. On this point, officers would warn against any inclination toward this position and it is not considered of any value to consider the two proposals as an either / or proposition. Whether Members choose to support or reject the Carsons Drive proposal, officers strongly recommend that this site should not be seen as any kind of viable or suitable substitute. Each site should still be considered upon its own merits and accordingly, because of its own fundamental unacceptability for development, the Shawlands Avenue site proposal should still be rejected.

#### *Glensford*

- 4.31 A further new Plan allocation proposal is the site at Glensford, off Crownfield Road. This has also attracted a relatively high number of objections. The site has recently been significantly cleared of vegetation although most important boundary screening remains in situ. An officer visit revealed that there were no trees felled that would have been clearly worthy of Tree Preservation Orders. The primary issues here have been around disposal of surface / foul water from the site and highways matters. On the former matter, consultation with Anglian Water has shown that to

achieve clean water supply, off-site improvement measures would be necessary. Further, improvements to the relevant sewage treatment works are cited as likely to be necessary and possibly a need for new surface water drainage infrastructure, unless more localised, site based measures possible. Accordingly, these issues can be overcome but some financial cost at the developers' expense, will be necessary. The resolution of any water supply and drainage related issues can be controlled satisfactorily at the detailed planning application stage.

- 4.32 The other principal planning matter is that of highways issues. Although local residents have cited traffic generation *per se* as problematic, this generic objection point is not borne out by evidence. However, a Transport authority objection remains concerning safety due to a substandard junction linking the road that would provide the site's access point and the road network beyond. This might be resolved through physical improvement measures, subject to land ownership constraints, and / or by traffic management measures through a Traffic Order. These measures again would be the responsibility of the developer to resolve and the grant of planning permission would not be appropriate until the LPA is satisfied on this matter. Again, this issue by itself, is not considered sufficient to require deleting the proposed allocation. A possible time phasing constraint is again introduced. Such phasing may prove relatively helpful, as there are issues tied in with adoption of the road to serve as the site's main access, which has never been satisfactorily completed. Renegotiation of a development proposal to remedy that matter can be sought in the meantime and this could well lead to a better overall development solution for all concerned, which would reflect more current circumstances and development requirements than those prevailing at the time the old planning permission was granted.
- 4.33 Finally, there is a need to ensure that this proposal is not planned or built in a piecemeal fashion. A caveat should be introduced to require a comprehensive scheme for this site and officers agree that this would be appropriate and support this view. This site allocation has been considered afresh, in the light of recent consultation and further information received. In conclusion, there are some adverse development issues (mainly technical in nature) that must be resolved before the proposal can come to fruition as a development. However, these are capable of remedy and to delete the allocation would cause a substantial disbenefit in terms of depriving Glemsford (the district's second largest village) of any future residential development opportunities on a reasonable scale to meet its needs. The site is also clearly the best option amongst the several alternatives that were proposed for Glemsford.

#### *Elmsett*

- 4.34 Another Post Inquiry Modification involved the deletion of a small residential allocation at Elmsett village (10 dwellings). The reasons for this were set out in the Inspector's report and again, the site's proponents have submitted objections to dispute these recommendations. These focus on a number of procedural, non planning issues, such as points citing unfairness, largely because the site had been included in the Plan for a long time and it therefore seemed unjust that (as a result of independent scrutiny) the site should then be deleted. However, without such provision for deletion of unsuitable site proposals the independent scrutiny process would be pointless and meaningless. If it merely endorsed all Local Plan proposals, both sound and unsound, there could be no confidence in that process. Such objections thus do not assist in the consideration of the planning merits of these matters.
- 4.35 The detailed objections and responses are set out in the full schedule and this site allocation proposal has been given careful reconsideration in the light of the objector's submissions but in summary it is considered that no substantive planning grounds or new considerations have been introduced to support a reversal of this site's deletion. For example, the site remains at least partly in active use and displays evidence of relatively vibrant continued use / activity. Any contribution to affordable housing needs, if any at all, would be very limited and securing provision through such small sites tends to prove problematic for various reasons. Other reasons for deleting this

allocation, as set out before, are also considered to remain valid. There is no convincing / overriding case for a residential allocation for this site.

#### *Wherstead*

- 4.36 The Post Inquiry Modifications stage also introduced land allocations to provide for a hotel and country park within the A137 / B1456 / A14 triangle, Wherstead. Issues raised here cited the principle of an hotel in an Area of Outstanding Natural Beauty (AONB); questions on how sustainable a location this would be for an hotel and the need to satisfy planning policy requirements in relation to town centres (PPS 6), which also covers this type of development. On the first of these, the principle of such development (or indeed most development) in an AONB is questionable, although it is considered that in this case the development is unlikely to be of a major scale and there are other material planning considerations in this particular case that could well balance against the usual presumptions against development in AONBs.
- 4.37 The location is not considered clearly unsustainable, due to its relationship with the Ipswich urban area and centre and availability of non-car transport provision. The compliance of this proposal with town centres policy is not so clear. However, any hotel or similar proposals that arise here will need to be scrutinised carefully and to be fully justified in relation to the various policy tests and demonstrable benefits will need to be evident to justify such new development. This matter has been reconsidered carefully as the issues are considered finely balanced. In conclusion, these matters are not deemed of sufficient magnitude, in themselves, to require further substantive modifications to the Plan.
- 4.38 At this same location, objections have arisen from the landowners who continue to seek substantial residential development to enable the provision of the country park proposal. In a related vein, objections from local residents have cited fears of such development to facilitate (as was proposed earlier in the Local Plan) or otherwise associated with the country park. Reconsideration has been necessary and accordingly given. The proposed residential development is considered to remain unacceptable and no suggestion of any change to this position is suggested. It is accepted that it is possible that the financial delivery of the country park may remain elusive or not forthcoming. However, the position should remain that it is better not delivered at all than it would be delivered through an unacceptable form of development. In the meantime, there are identifiable possibilities to deliver it, so as an aspiration and as a land use possibility, it is logical to leave this proposal in place, which cannot be regarded as blighting any land. A further change to delete the country park proposal is, therefore, not considered appropriate on balance.

#### *Hadleigh*

- 4.39 Some representations objecting to the change to the proposed Hadleigh supermarket site proposal (a change effected in 2004) were received. This matter has been considered and debated in the very finest of detail over recent years and none of these latest comments raised new issues. No changes on this matter are proposed. Another site-based issue for Hadleigh related to changes to the mixed-use development allocation off Grays Close (east of Lady Lane / south of A1071). The main change was an increase in the residential element as a result of objections from the developer being upheld. No new issues were introduced by the objectors, who basically reiterated earlier objections to the principle (and any details) of the proposal. A minor change only to correct the map illustrating these proposals is now proposed, the policy and the proposal remain unchanged.

#### *CPO*

- 4.40 Revisions were made to the policies addressing the proposed Hadleigh supermarket and the Chilton development. These introduced new wording to mention the fact that it is a *possibility* that the district council would use Compulsory Purchase Powers (CPO) to unlock access to these two

important developments, the wording being in response to identified potential problems in both cases. The rationale for such CPOs would be to secure the proper planning of the area. Despite objections claiming a breach of human rights and the references being *ultra vires* (beyond the powers or authority) and further consideration as a result, these references are still considered appropriate. As the Inspector points out, PPS6: Planning for Town Centres, specifically mentions that local authorities should consider scope for achieving similar objectives using their CPO powers. As was emphasized before their introduction, the references neither authorize such action and neither would their deletion preclude it.

- 4.41 The objector's point that a policy reference is not necessary to use such powers is accepted. However, in the interests of openness, transparency and certainty (as far as is possible) the references were included in good faith as a helpful measure for Plan users. Accordingly, it is difficult to reconcile the objector's objections with promoting those interests and the case for deletion accordingly becomes more difficult to substantiate. Given the above points, the suggestion that the use of CPO powers is *ultra vires* is not accepted. In any event, the references make it clear that a negotiated agreement will be sought, as is typically the case in such instances. The use of CPO powers is seen as a draconian measure and it is clear that it is in the interests of all concerned that this measure would only be contemplated as a last resort. The CPO reference for Chilton also received a representation of support.

#### *Sudbury*

- 4.42 An individual representation objected to the safeguarding of the route for the proposed Sudbury western bypass (PIM changes were made to wording on this matter). This question has been reconsidered but any such change in position is not supported for a number of reasons, including the need to allow for the possibility of circumstances changing and funding become available / a Governmental acceptance of the case for the bypass. Sudbury Town Council welcome this reaffirmation of support. However, in a closely related vein, the Town Council has emphasised its concerns regarding potential impact of increased traffic affecting Sudbury town centre as a result of the considerable scale of development proposed in Sudbury and its hinterland. This point is dealt with where applicable elsewhere in this report.

#### *Other Matters*

- 4.43 A representation objected to an insufficient development density for a proposed residential development site at Great Waldingfield. In response, an increase in the proposed development density is not considered necessary or appropriate for the site and its policy but an explanation to relate the particular circumstances of that site better is proposed, as a non substantive change.
- 4.44 Very limited numbers of objections were received to deletion of some Areas of Visual and / or Recreational Amenity (AVRAs) (Newton) and some Built up Area Boundary Changes (BUABs) (Newton). No changes are considered necessary as a result. The reclassification of a small number of villages between the sustainable and non sustainable categories also provoked objections (Stratford St Mary & Elmsett) but those reclassifications are considered to be based upon sound, up-to-date evidence and the consequence of those changes is considered insubstantial in any case, given the unlikelihood of large development sites coming forward with them. There is also the undesirable low-density development effect that limiting development within them to groups of up to 5 dwellings would have.

### *Policy CR05: Special Landscape Areas*

- 4.45 In terms of non site-specific matters, the only policy issue to attract a substantial volume of objections was Policy CR05: Special Landscape Areas. This matter unsurprisingly became tied up with the Carsons Drive land allocation issue but it should not be so. Many forms were distributed (by objectors) to people that quoted the Policy CR05 change reference number and these were misunderstood as another means by which to object to the Carsons Drive proposal. That said, numerous valid objections to the revised policy wording were submitted.
- 4.46 On this matter there are several points to make in response. Firstly, the Inspector's recommended changes arose as a result of a need for Babergh's policy to reflect national planning policy more closely (in PPS 7: Sustainable Development in Rural Areas). These are local landscape designations only and need to be afforded weight / protection commensurate with that status. In the absence of demonstrably unusual or exceptional local circumstances sufficient to merit taking a substantially different approach from the national planning policy, departing from the established planning policy position cannot be justified or supported. Secondly, in Babergh, SLAs are being regarded as a valid and appropriate means of blocking further development in principle and the extent of SLA designated areas in Babergh is very considerable. Although the very high natural value of the district is recognized, this approach is deemed unlikely to be supported by the Government, as these vast tracts of designated land could be used to act as a substantial development obstacle in future contrary to the district's identified development needs.
- 4.47 If a very substantial part of a district's area is sought for designation (as a means of blocking valid development needs) this could serve to undermine the status of the more special areas. Plus, this is only one development constraint and consideration amongst many anyway. It must be remembered that what is sought is careful control over development and that is appropriate, but not an absolute block to an area's legitimate development needs. Parts of the country designated as National Parks, Heritage Coasts and of course AONBs, as here, cannot be 'sterilised' from all development in perpetuity, as they remain living, working areas where people continue to need homes and a means of making a living. PPS 7 recognizes this, through its emphasis on sustainable development (Sustainable Development does not mean 'no development'). No further changes to Policy CR05 are proposed and it is contended that a decision by the Council to disregard this would not withstand scrutiny by Planning Inspectors upon appeal if the non-conforming policy were used as a basis for refusing planning permission. The exercise would thus seem pointless.

### Strategic Considerations and Scale of Development in Babergh

- 4.48 Whilst considering individual decisions on each of the more detailed matters that this report addresses, it is necessary at the same time to consider the more strategic level of planning within which Babergh must operate. Recently the Government published its response to the Barker report on Housing Supply and it would be reasonable to say that the current agenda entails aspirations for significant levels of future (housing and employment) growth for the country's southern-most regions, including East Anglia. Also, as this Committee meeting occurs, the Panel for the draft East of England Plan (Regional Spatial Strategy) is writing up its report following the conclusion of the Examination in Public (the Inquiry into this Plan) at the beginning of March 2006. Objections to Babergh's proposed housing allocation figure for 2001-2021 were submitted and promoted by development interests. In this context, there are possibly implications for Babergh if it now chooses to adopt a Plan that fails to allocate sufficient housing land to meet its current allocation. This could include a recommendation by the Panel or by the Government subsequently (which must consider the Panel's recommendations) to increase Babergh's allocation to meet any current shortfall in supply.

4.49 In addition, the East of England Regional Assembly (the body responsible for producing the Regional Spatial Strategy) has expressed commitment to an early review of the Plan. This would mean another time in the near future when Babergh's figures are reviewed and re-examined externally and independently. Accordingly, there is a case for adopting a Plan now that meets its allocation figures, rather than inviting the Panel or Government to reconsider the district's development levels afresh, relatively soon after it has chosen to under-provide housing supply to meet a target that Babergh considers as not in any way excessive.

#### Further Local Plan Inquiry: Modifications Inquiry

4.50 When objections are received to proposed modifications, it is for the local planning authority to determine whether or not a further inquiry is necessary. The Council has no duty to hold a second inquiry. Officers have considered this matter carefully in the light of all the relevant considerations, including a very careful analysis of the representations raised. One of these varied considerations is the very substantial delay that holding a further inquiry would involve and this would clearly hold up the achievement of an up-to-date Local Plan. Accordingly, this point has very significant disadvantages in relation to establishment of an adopted Development Plan to serve the best planning interests of the district. In the light of all the various factors that have been considered and balanced, the conclusion reached is that a further inquiry is not necessary.

#### Decisions on any further substantive changes or adoption of Plan and Procedures

- 4.51 The first point to note is a procedural one. This is that if the Council now chooses not to make any further substantive changes, it must then advertise that fact and publish a notice of its intention to adopt the Plan, in its current form. This could be done relatively quickly.
- 4.52 However, if it is decided that further substantive changes are now proposed at this point, including changing the Council's position substantially on the modifications (changes) just incorporated, a further 6-week period of public consultation becomes necessary. Those further changes would then need to be advertised and comments / objections invited. Since the changes made recently were (almost entirely) as a result of the Inspector's recommendations, the Council would then have to advertise those further changes as recommendations that the Council (now) chooses not to accept. As advised previously, the Council must demonstrate full, cogent and defensible reasons on sound planning grounds for not accepting the Inspector's recommendations. Objections can then be made to the Council's decisions not to accept those recommendations.
- 4.53 Following this extra public consultation period, officers would have to again analyse the responses received, report them to Committee / Council, with a recommendation on the appropriate course of action at that time and act upon the Council's decisions as appropriate.
- 4.54 It should be noted that going through a further modifications stage now and the procedures that this involves carries with it significant risks. Officers have assessed carefully the implications of this course of action for the timescale and deadline for adoption of the Plan. Clearly, there would be an urgent need to re-open the 6-week consultation period extremely quickly after the full Council meeting, should it be decided that further modifications are to be pursued. Any report would have to be submitted straight to Council at its meeting on 20 June, rather than to Strategy Committee first, as there would not be time to do this. An advertisement would need to be placed with newspaper publishers in advance, followed by a very short notice instruction to publish, to allow Babergh to publicize a notice of intention to adopt the Plan. Not only would these special measures be necessary but there would be absolutely no scope for any problems or complications that may arise affecting the necessary process / procedures, such as a Council meeting failing to agree a decision, meeting adjournment, or any other unforeseen circumstances. Therefore, the Council will be faced with increasing uncertainty and risks as to whether it can achieve an adopted Plan by the deadline. The question must therefore be asked as to whether any changes now

contemplated really would result in a better Local Plan and whether adopting the Plan as it is now would not provide a suitable planning framework for the district. The officers' recommendation now is not to make any further substantive changes at this point and pursue adoption of the Plan as expediently as possible.

### Conclusions

4.55 A very substantial public consultation exercise has recently been carried out. This exceeded the requirements upon the Council to consult its communities. The Council has therefore provided considerable opportunity to express views and it has listened to those views. A thorough analysis of the representations has been carried out. This report responds to the comments made on the proposed modifications and to related submissions to the Council. Accordingly, it now proposes some minor changes in response, in a manner that it is appropriate to do so. The new Plan will have the great benefit of introducing greater certainty for all involved in the planning process. The need to have in place an adopted Local Plan to guide planning in Babergh for the period to 2016 is paramount. It is, therefore, the Council's duty to consider how to move the Plan forwards towards its adoption. Members are recommended to agree the responses recommended by this report, including a number of minor changes, and to agree to progress the Local Plan towards adoption as expediently as possible.

### 5. APPENDICES

- (A) Tables listing numbers and types of representations received on each L P modification
- (B) Schedule of all (non substantive) changes now proposed in response
- (C) Schedule of all summarised representations with their reference numbers, listed against the matters they related to and officers' proposed responses

### 6. BACKGROUND PAPERS REFERRED TO:

None.

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## **Babergh Local Plan Alteration No 2**

**Tables Listing Numbers & Types of Representations Received on Each LP Modification**

## Chapter 1 - Introduction

<b>PIM Number</b>	<b>Object</b>	<b>Support</b>	<b>Local Plan Paragraph/Policy number</b>	<b>Issue raised/ Reason for modification</b> (abbreviations: I = Change recommended by Inspector; PIC = Pre-Inquiry Change; E = Error to be corrected)	<b>Number of representations</b>
1/2	Object		1.13 Strategy & Aims of the Plan	Change of wording / PIC161	1
1/2		Support	1.13		1
1/3		Support	1.15A Regional Planning Guidance for the East of England		1
1/6		Support	1.44 Implementation (Utility companies)		1
1/7	Object		LP01 Planning Obligations	Change of wording / PIC21 + I	2
1/8	Object		1.49 Planning Obligations	Change of wording / PIC + I	1
1/8		Support	1.49		1

## Chapter 2 - Environment

2/1		Support	6.37 Biodiversity		1
2/7		Support	2.16 Protection of floodplains and washlands		1
2/8	Object		EN07 Water Conservation	Deletion of wording / I	1
2/8		Support	EN07		1
2/10	Object		EN10 Surface Water Run-off	Modify wording / I	1

*Sched C PIM 2/12	Object		2.25 Hazardous installations and contaminated land	Alter Proposals Map to show locations / routes of known installations and pipelines	1
2/19		Support	EN27 Telecommunications		1
<b>Chapter 3 - Settlement Policy and Housing</b>					
3/1	Object		3.1 Introduction	Deletion of wording / PIC29 + I	1
3/2	Object		3.15b Structure Plan Housing Provision	Deletion of wording / PIC30 + I	1
3/4	Object		3.24a The Sequential Approach	Deletion of paragraph / PIC32 + I	4
3/4		Support	3.24a		1
3/5	Object		3.24b Phased Release of Housing Development	Deletion of paragraph / PIC33 + I	1
3/5		Support	3.24b		2
3/6		Support	3.24c “ “ “ “		2
3/7	Object		HS01a “ “ “ “	Deletion of Policy / PIC38 + I	1
3/7		Support	HS01a		2
3/8	Object		3.24d “ “ “ “	Deletion of paragraph / PIC35 + I	1
3/8		Support	3.24d		1
3/9		Support	3.24e “ “ “ “ and Table 3		1
3/11		Support	3.27 Towns/Urban Areas		1
3/19	Object		HS03 Villages	Modification to the definition of sustainable and non- sustainable villages, and subsequent modification to list of villages in each category / PIC + I	2
3/27		Support	Long Melford (South) BUAB & AVRA designations	Note: 2 of these 3 representations of support also wished to see this site allocated for housing	3
3/29	Object		Newton BUAB & AVRA	Deletion of 2 AVRAs, and inclusion of a site within	1

			designations	BUAB / PIC + I	
3/36		Support	3.41 Affordable Housing		1
3/37		Support	3.41e “ “		1
3/38	Object		3.41I “ “	Deletion of part of paragraph and insertion of amended wording / I + PIC49	1
3/39	Object		HS08 “ “	Amendment to policy wording. PIC50 + I	1
3/41	Object		3.51 Housing allocations	Suggested information is updated. However, disagree and propose deletion of para 3.51 as total figure for all eventual housing allocations is not known.	2
3/43	Object		HS09A(b) Head Lane/Broom Street, Great Cornard	Deletion of text and insertion of new text / PICs 52 & 63	1
3/47	Object		HS09G(a) People’s Park, Sudbury	Amendments to policy / I & PIC56	3
3/48	Object		HS09H Grays Close, Hadleigh	Amended policy wording / I	6
3/48		Support	HS09H Grays Close, Hadleigh		1
3/49		Support	HS09I Gallows Hill, Hadleigh		1
3/50	Object		HS09J Shawlands Avenue, Great Cornard	Deletion of allocation / I	7
3/52	Object		HS09P Maltings Farm, Whatfield Road, Elmsett	Deletion of allocation / I	1
*Sched C PIM 3/53	Object		HS09Q Density at Folly Road Great Waldingfield	Add supporting text after the policy	1
3/55	Object		HS09T Land off Bourne Hill, Wherstead	Policy substantially modified – Housing allocation deleted, new allocation for Country Park and an hotel / I	17
3/55		Support	HS09T Land off Bourne Hill, Wherstead		1
3/57	Object		Housing Omission Site	Modification of text to include Capel St Mary as a	1

			Proposal – Capel St Mary	sustainable village once the employment allocation has been substantially developed / I	
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3/58	Object		Housing Omission Site Proposal – Crownfield Road, Glemsford	New policy HS09U: allocation of 1.8 ha of land for 45 – 60 houses / I	64
3/59	Object		Housing Omission Site Proposal – Carsons Drive, Great Cornard	New policy (to replace the deleted allocation at Shawlands Drive) HS09J: allocation of approx 4.4 ha of land off Carsons Drive for about 170 dwellings / I	551 from 398 postal addresses. 330 in the Babergh District and 68 from outside.
3/59		Support	Housing Omission Site Proposal – Carsons Drive, Great Cornard		1
3/60	Object		Omission site proposal - Hadleigh	Modification of BUAB to include site / I	4
3/61	Object		HS11	Amended wording / PIC 61 + I	1
3/67		Support	HS15 Public Open Space & Play Areas on New Development		1
3/68		Support	HS16 Public Open Space & Play Areas on New Development		1
3/69		Support	HS17 Extensions to Existing Dwellings		1
3/70	Object		3.83 Smaller dwellings	Amended wording / I and to accord with changes to Policy HS18	2
3/70		Support	3.83		1
3/71	Object		HS18 Smaller Dwellings	Amended wording in first para of policy / I	1
3/71		Support	HS18		1

## Chapter 4 - Economy and Employment

4/3	Object		4.17a Key Employment Sites	Amended wording / I	3
4/3		Support	4.17a		1
4/4	Support		EM02a Former IFF site near Long Melford	Policy deleted / I (agreed at Inquiry)	1
4/5	Object		EM02b Employment allocation at Grays Close, Hadleigh	Amended wording / I	3
4/5		Support	EM02b		1
4/8	Object		EM02d Wherstead Office Park (Former Powergen/E.ON/TXU)	Amended wording / PIC + I	1
4/9		Support	EM02e Brantham Industrial Area		1
4/17	Object		EM14 Workshop scale sites	Amended wording and deletion of Cattawade, Brantham from list / I (agreed after negotiation during the Inquiry)	1
4/18		Support	4.46 Retention of Employment Sites		1
4/19		Support	EM15 “ “ “ “		1
4/22	Object		Ins 14 Ipswich Fringe		1
4/22		Support	Ins 14 Ipswich Fringe		1
4/25	Object		Ins 17 Notley Enterprise Park		2
4/26	Object		Proposals Map Notley		1

### Chapter 6 - Countryside and the Rural Economy

6/5	Object		CR05 Special Landscape Areas	Deletion of policy and insertion of new policy wording (transfer of list of SLAs to supporting text) / I	405 from 292 postal addresses. 254 in the Babergh District and 38 from outside.
6/6	Object		CR06 Special Landscape Areas	Amended wording / I + E	1
6/13		Support	CR22 Change of Use from Agricultural Land to Domestic Gardens		1

### Chapter 7 - The Built Environment & Conservation

7/17		Support	CN21 Street Furniture & Overhead Wires		1
7/18	Object		7.39 “ “ “ “ “	Insertion of wording formerly Policy CN22 as supporting text (statement of intent and therefore contrary to PPG12)	1
7/19		Support	CN22 “ “ “ “ “	Deletion of policy – see above	1

### Chapter 8 - Recreation and Tourism

8/1	Object		8.14 Playing Fields	Amended wording / I + E + Updating	1
8/2	Object		RE03 “ “	Amended wording / I	1

### Chapter 9 - Transport

9/12		Support	9.40 Transport in Sudbury & Great Cornard		1
9/13		Support	9.41 “ “ “ “ “		1
9/14	Object		9.42a “ “ “ “ “	Amended wording / PIC138 (Sudbury Western Bypass update)	1
9/14		Support	9.42a		1

### Chapter 11 - Hadleigh Town

11/2	Object		Paragraph 11.15 Shopping	Deletions and insertions of new paragraphs relating to the changed site allocation of a new food supermarket in Hadleigh / PIC1/ I	2
11/2	Object		Policy HD01a Food Supermarket allocation, Hadleigh	Deletion of site at Aldham Mill Hill, and replacement with new policy HD01b allocation of site between Pound Lane and Bridge Street, Hadleigh (Brett Works site) / PIC2 / + I	12
11/2		Support	Deletion of HD01a & replacement with HD01b		7
11/4	Object		Inset Map 10 (Hadleigh)	Correction of base map / PIC7 + E + U	2

## Chapter 12 - Chilton Mixed Use Development

12/5		Support	12.23 Community & Retail Facilities		1
12/8	Object		12.24a Retail Expansion	Deletion of para 12.24a and replace with up-to-date para to be numbered 12.25a / PIC183 + I	1
12/8		Support	12.24a		1
12/9		Support	12.26 Community Woodland		1
12/10		Support	12.27 “ “		1
12/11		Support	CP01 Chilton Mixed Use Development Package		1
12/12		Support	CP01a)		1
12/13		Support	CP01b)		3
12/14		Support	CP01c)		1
12/15		Support	CP01d)		1
12/16	Object		CP01d)a) potential expansion of existing Tesco superstore	Amend policy wording and insertion of additional criteria / PIC 191 + I	1
12/16		Support	CO01d)a)		1
12/17		Support	CP01e)		1
12/18		Support	CP01f)i)		1
12/19	Object		CP01f)ii) new text – neighbourhood centre	Additional paragraph designating 1.55 ha for a neighbourhood centre providing retail floorspace / PIC194 + I + updating Plan	1
12/19		Support	CP01f)ii)		1
12/20		Support	CP01f)iii) new text – community facilities		1
12/21	Object		CO01g)		5

12/21		Support	CP01g)		1
12/22		Support	CP01g)		3
12/23		Support	Inset Map 1	Changes to reflect changes to the Masterplan / PIC198 + I + updating Plan	1
12/24	Object		Inset Map 1C	Remove Masterplan details and show overall site extent and proposed means of access / PICs109 & 199 + I	1
12/24		Support			1

Note: \*Sched. C (PIM 2/12 and PIM 3/53 above) refers to Schedule C of the Post Inquiry Modifications, Recommendations not Accepted by the Council (January 2006)



## **Babergh Local Plan Alteration No 2**

**Schedule of All (non substantive) Changes Now  
Proposed in Response**

**Table of Changes proposed following representations**

<b>PIM Number</b>	<b>Proposed Change to Modification</b>	<b>Reason for Change</b>
1/3 (RSS para 1.15a)	<p>The Regional Planning Guidance <b>Spatial Strategy</b> is currently being updated and will cover the new East of England Region. The first consultation draft of the new guidance (<del>RPGSS14</del>) covers the period up to 2021 and consultation took place <del>between</del> <b>in September 2002 and December 2002</b>. The draft <del>RPGSS14</del> is due in mid-2003; followed by the second consultation period and the new guidance is expected to be adopted sometime in 2004 <del>to be submitted to the Secretary of State was 'banked' in February 2004, with a twelve-week consultation period starting ending in March 2004.2005. The public examination is expected to be in October 2004 ended in March 2006, with the final publication due likely in July-2005 Spring 2007.</del></p> <p>These are some of the key highlights from the first consultation draft document relating to the spatial strategy for the region and sub-regions are set out below:</p> <ul style="list-style-type: none"> <li>• The Spatial Planning Vision <del>Division</del> for the East of England is to develop a prosperous, outward-looking and more sustainable region, respecting its diversity, maintaining and enhancing its assets, and sustaining and improving the quality of life for its people who live in, work in or visit the region;...</li> </ul>	Wording updated and spelling corrected. Minor changes.
2/10 (Policy EN10)	<p>Add/amend words in <i>italics</i> (minor wording change only): -</p> <p><b>The use of Sustainable Drainage Systems* for dealing with surface water run-off from new developments will be required unless, <i>following an adequate assessment, soil conditions and/or engineering feasibility dictates otherwise.</i> . . . . . (remainder as PIM2/10)</b></p>	Environment Agency has suggested amended wording to make it more precise.
2/12 (Proposals Map)	Amend Proposals Map to show location / route of any known hazardous installations and pipelines under the Health & Safety Executive's remit. This is only a minor technical change for completeness of information – no change in policy approach	In response to rep. 25 (by Health & Safety Executive) and rep. R1081 (by Go East) on earlier decision not to accept Inspector's recommendation

	necessary or proposed	
3/48 (Hadleigh Map)	Minor alteration to <b>Inset 10</b> . <b>See PIM 11/3 below</b>	To correct an error – so that Inset Map correctly reflects Policies HS09H and EM02b.
3/53 (Policy HS09Q)	Add new paragraph of supporting text to follow policy, as shown: <b>'In considering development proposals for this site regard will be paid both to the need to make the most efficient use of land and to the most suitable development density for this particular site. Some constraints on the site are known, including the need to retain important landscape features, to incorporate further landscaping and the site's location where the village edge and open countryside meet. Other constraints are not yet known, including potential contamination. As a result, factors including the exact net developable area and the most appropriate development density cannot be identified precisely yet. The figures quoted in the policy are therefore notional estimates.'</b>	In response to GO East representation R1082 and as helpful note to ensure conformity with PPG3 / PPS3. Also decision on response to Inspector's recommendation now retaken and recommendation will be accepted (by addition of explanation)
3/55 (Para 8.30a, relates to new Policy HS09T)	Add additional sentence to end of new paragraph 8.30a, minor change: <b>'Any hotel proposals for this location will need to satisfy the requirements and tests of PPS6: Planning for Town Centres.'</b>	In response to GO East representation R1075 and as helpful note to ensure conformity with PPS6.
3/58 (new Policy HS09U)	Add note after Policy HS09U: - <b>Note: In relation to criterion four above the Transport Authority advise that notwithstanding any physical improvements that may be achieved at the junction of Crownfield Road and Brook Street, the minimum required to satisfy this criterion is that the developer should promote any Traffic Orders necessary to achieve traffic management measures designed to improve visibility at this junction.</b>	To meet the Transport Authority's objection that the proposed highway criteria in this policy is not sufficiently precise.
3/61 (Policy HS11: Housing)	Add new supporting text as new para. 3.62a to follow the policy: <b>'In applying Policy HS11 and considering any exceptions to it, the</b>	In response to GO East representation R1076 and as helpful note to ensure conformity with PPG3 / PPS3.

Density)	<p><b>following circumstances will be considered as material:</b></p> <p><b>(a) Situations where a development solution with a density of 30 dwellings per hectare (or higher) cannot be achieved, in terms of the impact of the scheme on the character and appearance of the locality;</b></p> <p><b>(b) The need to demonstrate that the lower density sought makes the most efficient use of land, whilst taking into account the character and appearance of the local area; and</b></p> <p><b>(c) The need to demonstrate that higher density schemes would lead to unacceptable outcomes (such as increasing the need to travel) in terms of the incremental expansion of villages with few or no local facilities (including passenger transport services) and where there is little or no likelihood of such facilities being provided.'</b></p>	
3/70 Smaller Dwellings	<p>Delete the word "seek " from the final sentence of paragraph 3. 83 - sentence should read: -</p> <p><b>Subsequent surveys will determine whether this figure should change over the plan period.</b></p>	To correct an error. It was intended to use the Inspector's recommended wording for this proposed modification to paragraph 3. 83.
4/8 (Policy EM02d)	<p>A minor amendment to the fifth bullet point is proposed to read: -</p> <p><b>"Provision of a new access from the A137 (designed and constructed to adoptable standards) to serve both the existing ....."</b></p> <p>remainder of bullet point as in PIM 4/8</p>	The reason for this suggested amendment is understood, however, it is not appropriate to require adoption of an access road in the policy. However, a minor addition to this bullet point would facilitate adoption of the access road.
4/25 (Inset Map 17)	The Proposals Map is to amended to show Inset 17 (minor map change)	Omitted in error
8/1 Playing Fields, para 8.14) relates to Policy RE03)	<p>Paragraph 8.14 proposed amended version: -</p> <p><b>The District Council will encourage the County Council to allow increased public use of school playing fields. PPG17 strongly resists the loss of such facilities where they are in active use</b></p>	Technical corrections and updates.

	<p>and paragraph 15 of the PPG sets out a series of tests that should be met in order to allow the development of playing fields. Furthermore, Sport England are a statutory consultee on proposals that affect playing fields, and the 1998 Playing Fields Direction requires local planning authorities to notify the Secretary of State in circumstances where they are minded to allow development affecting playing fields, but where Sport England has objected. Sport England's Planning for Sport and Active Recreation: Objectives and Opportunities (Interim Statement 2005) sets out the circumstances where there may not be a reason to object to such an application.</p>	
8/2 Policy RE03 Playing Fields	<p>Add note at end of Policy RE03: -</p> <p><b>Note: the above policy should be read in conjunction with, and is in addition to, the criteria set out in paragraph 15 of PPG17: Planning for Open Space, Sport and Recreation (July 2002)</b></p>	<p>Minor amendment to draw attention to national policy, particularly the tests in paragraph 15 of the PPG.</p>
11/3 (Hadleigh Map)	<p><b>Inset 10</b> - Update base map and make consequential changes/updates (i.e. development and structural landscaping completed, and new BUAB in these areas). Reveal extent of Local Nature Reserve. <b>See PIM 3/48 above</b></p>	<p>Ordnance Survey base recently updated to show new housing in north Hadleigh and extension of Lady Lane industrial estate. Correction to show that part of Local Nature Reserve that had been covered by SLA shading.</p>
12/19 (Chilton Development Policy CP01f)ii)	<p>Add new brief supporting text note to clarify retail planning position on new neighbourhood centre: <b><i>'Note: In considering proposals for development for the centre all provisions of PPS6 will be applied.'</i></b></p>	<p>In response to GO East representation R1077 and as helpful note to ensure conformity with PPS6.</p>



## **Babergh Local Plan Alteration No 2**

**Schedule Of All Summarised Representations With Their Reference Numbers,  
Listed Against The Matters They Related To And The Officers' Proposed Responses**

## Chapter 1 - Introduction

### PIM 1/2 para 1.13 Strategy and Aims of the Plan

<b>Objections</b>		
Rep Nos	Issues	Response
R1170	Reinstatement of original wording of para. 1.13 sought	Pre Inquiry Change but no objection received before LP Inquiry. Inspector supports this PIC change made in response to an (upheld) objection and need to reflect Government planning guidance. Objection takes no account of either factor.
<b>Supports</b>		
R1121	Support the proposed modification	Noted.

### PIM 1/3 para 1.15a Regional Planning Guidance for the East of England

<b>Supports</b>		
Rep Nos	Issues	Response
R1122	Support proposed modification	Noted.

### PIM 1/6 para 1.44 Implementation (Utility Companies)

<b>Supports</b>		
Rep Nos	Issues	Response
R1123	Support proposed modification	Noted.

### PIM 1/7 Policy LP01 Planning Obligations for Services, Facilities and Improvements

<b>Objections</b>		
Rep Nos	Issues	Response
R1205	Replace 'sought' with 'required'	As R1170 (PIM1/2). "Pre Inquiry Change but no objection received before LP Inquiry. Inspector supports this PIC change. The wording reflects government guidance and recognises that contributions would be subject to negotiation. These can only be sought when necessary and not as a matter of course.
R1171	Replace 'seek' with 'require'	See above

### PIM 1/8 para 1.49 Planning Obligations for Services, Facilities and Improvements

<b>Objections</b>		
Rep Nos	Issues	Response
R1172	Plan does not specify what measures necessary for development to proceed	As R1170 (PIM1/2) & R1171 (PIM1/7). Objection raises a number of irrelevant / erroneous points made in relation to a different issue. See response to R1170 & R1171.
<b>Supports</b>		
Rep Nos	Issues	Response
R1124	Support proposed modification	Noted.

## Chapter 2 - Environment

### PIM 2/1 para 6.37 Biodiversity

<b>Supports</b>		
Rep Nos	Issues	Response
R1159	The RSPB supports the identification of non-designated sites within the district for their regional biodiversity importance, in addition to sites that are important at a county level. We are pleased to see consideration given to biodiversity on a broad scale, encompassing all levels of importance.	Noted

### PIM 2/7 para 2.16 Protection of floodplains and washlands

<b>Supports</b>		
Rep Nos	Issues	Response
R1125	Support proposed modification	Noted.

### PIM 2/8 Policy EN07 Water Conservation

<b>Objections</b>		
Rep Nos	Issues	Response
R1173	Reinstate original wording	Change made in response to upheld objections and supported by Inspector. Requirement not enforceable through development control powers. If Policy ENV12 is to be cited as the appropriate, enforceable approach (doubtful in itself) then there is no need to duplicate this policy anyway.

**PIM 2/8 Policy EN07 Water Conservation**

<b>Supports</b>		
R1126	Support proposed modification	Noted.

**PIM 2/10 Policy EN10 Surface Water Run-off**

<b>Objections</b>		
Rep Nos	Issues	Response
R1086	Proposed wording would allow developers to avoid implementing SUDs schemes - suggest amended wording	The proposed amendment would make the policy more precise, and it is proposed to incorporate the Environment Agency's suggested wording into the policy.

**Schedule C PIM 2/12 para 2.25 Hazardous installations and contaminated land**

<b>Objections</b>		
Rep Nos	Issues	Response
R1081	PPG12 requires that authorities include in their development plans policies relating to establishments where hazardous substances are used or stored, and to the development of land within the vicinity of establishments where hazardous substances are present. GoEast do not consider the Council's reasons for not including such a policy to be sufficient in terms of the cogency test in PPG12 Annex B. The Council should modify the plan in line with the Inspector's recommendation and PPG12.	Comments noted although the objection relating to this matter was withdrawn and should not have proceeded to the LP Inquiry. Case for new policy not to be accepted at this stage but will be addressed early on through a DPD policy in the district's new LDF, work on which is scheduled to commence relatively soon (post adoption of Local Plan). Babergh already has adequate consultation procedures in place to address this matter, where hazardous substance establishments might be affected by development. Agree to alter Proposals Map (subject to any limitations imposed by map scales) to show locations / routes of known installations and pipelines for completeness of information. Map change proposed (minor / technical in nature)

**PIM 2/19 Policy EN27 Telecommunications**

<b>Supports</b>		
Rep Nos	Issues	Response
R1161	Support the proposed modification as it provides clarification to the provisions of Policy EN27.	Noted

## Chapter 3 - Settlement Policy and Housing

### PIM 3/1 para 3.1 Introduction

<b>Objections</b>		
Rep Nos	Issues	Response
R1174	Conflict with Suffolk Structure Plan (SP) Policy CS7 & sequential approach thereof	Pre Inquiry Change but no objection made at that stage. Thus objection resultant of a post inquiry issue. Change supported by Inspector, who considered the SP Policy CS7. Objection misunderstands CS7 in any case, which does not refer to phasing but to the approach to which sites to allocate. This approach has been followed. Objection cites risk of legal challenge but gives no explanation of the basis for this and it is based on an incorrect interpretation of the policy it quotes.

### PIM 3/2 para. 3.15b Structure Plan Housing Provision

<b>Objections</b>		
Rep Nos	Issues	Response
R1184	Specific mention should be made to the scale of the Structure Plan inaccuracies and what the figures relate to.	The proposed change to this paragraph is a Pre-Inquiry Change and deletes reference to an appendix. This objection is not to a proposed Post Inquiry Modification change.

### PIM 3/4 para 3.24a The Sequential Approach

<b>Objections</b>		
Rep Nos	Issues	Response
R149, R151, R1193, R1203	Deletion of text	The Inspector agrees with the District Council's proposal, published as Pre-Inquiry Changes, to delete Policy HS01a and paragraph 3.24a. The Suffolk Structure Plan 2001 and PPG3: Housing require new housing to be located in the larger settlements. Babergh District has only two towns, Sudbury and Hadleigh, which together with the western fringe of Ipswich have had the majority of allocations for new housing. Major growth is planned for Sudbury, and Hadleigh has only two new allocations, 0.6 ha of land at Gallows Hill, and the mixed-use development east of Grays Close for 145 dwellings. Given the sustainable nature of the town and the need to provide for housing growth in the district, this is considered to be a modest level of development over the plan period. It is considered that paragraph 3.24a is no longer necessary and should be deleted.
<b>Supports</b>		
Rep Nos	Issues	Response
R1127	Support proposed modification	Noted.

### PIM 3/5 para 3.24b Phased Release of Housing Development

<b>Objections</b>		
Rep Nos	Issues	Response
R1175	Conflict with Suffolk SP Policy CS7 & sequential approach	Duplicates R1174 (PIM 3/1) objection therefore unnecessary. See response to R1174.
<b>Supports</b>		
Rep Nos	Issues	Response
R1128	Support proposed modification	Noted.

**PIM 3/6 para 3.24c Phased Release of Housing Development**

<b>Supports</b>		
Rep Nos	Issues	Response
R5, R1129	Support the proposed modification - deletion of text	Noted

**PIM 3/7 Policy HS01a Phased Release of Housing Development**

<b>Objections</b>		
Rep Nos	Issues	Response
R1176	Reinstatement of Policy HS01a sought	Duplicates R1174 (PIM 3/1) objection therefore unnecessary. See response to R1174.
<b>Supports</b>		
Rep Nos	Issues	Response
R6, R1130	Support proposed modification - Deletion of text	Noted

**PIM 3/8 para 3.24d Phased Release of Housing Development**

<b>Obejctions</b>		
Rep Nos	Issues	Response
R1177	Reinstatement of Policy HS01a sought	Duplicates R1174 (PIM 3/1) objection therefore unnecessary. See response to R1174.
<b>Supports</b>		
Rep Nos	Issues	Response
R7	Deletion of text	Noted

**PIM 3/9 para 3.24e and Table 3 Phased Release of Housing Development**

<b>Supports</b>		
Rep Nos	Issues	Response
R8	Deletion of text	Noted

### PIM 3/11 para 3.27 Towns/Urban Areas

<b>Supports</b>		
Rep Nos	Issues	Response
1088	Support inclusion of Wherstead Bourne Hill and The Strand	Noted.

### PIM 3/19 Policy HS03 Villages

<b>Objections</b>		
Rep Nos	Issues	Response
R54	Seek the classification of Elmsett as a sustainable village	Whether a village is considered to be 'sustainable' or 'non-sustainable' will depend on whether it contains all the facilities listed in Suffolk S P Policy CS3, that is: - a primary school; good journey to work public/community transport to a town; convenience goods shop; community leisure and social facilities; and a variety of employment opportunities which have potential for further development. Elmsett is a small village which lacks a variety of employment opportunities and good journey to work links to a town, and is therefore only considered to be suitable for infilling (1 - 3 dwellings) and unsuitable for a specific allocation of housing.
R1020	Seek the classification of Stratford St Mary as non-sustainable	Stratford St Mary contains all the facilities listed in Suffolk S P Policy CS3. There are no proposals for housing allocations in this village. The change in designation will apply in the way proposals are considered against Policy HS02. Larger groups of dwellings will only be allowed within the Built-Up Area Boundary and providing the criteria set out in Policy HS02 are met.

**PIM 3/27 Long Melford (South) Built Up Area Boundaries For Villages & AVRA Designations**

<b>Objections</b>		
Rep Nos	Issues	Response
R1199, R1200	Would like to see the site allocated for residential development.	The Council agrees with the Inspector, who states that adequate provision has been made for housing in the Sudbury Area during the Plan period and that further allocations are not necessary to meet Structure Plan Requirements. The site will not be allocated for residential development.
<b>Supports</b>		
R1198, R1199, R1200	Support the proposed modification that the BUAB for Long Melford (South) be extended to include the skip depot site.	Noted.

**PIM 3/29 BUAB for Villages and AVRA Designation Newton**

<b>Objections</b>		
Rep Nos	Issues	Response
R172	Objects to removal of AVRA designation at land opposite Saracens Head PH. This piece of land is the only break in Newton BUAB on the north side of the A134. Maintaining the AVRA on this land gives added protection when future plans are considered. The AVRA protects the openness that is valued by residents.	The identification of AVRAs outside built up area boundaries is a duplication of protection for the open countryside. PPS1 and PPS7 strongly resist development in unacceptable locations in open countryside, and public open space and playing fields are protected from development by policies in the Plan. There is no need to add a layer of protection to land that is outside the BUAB as Policy ENV4 in the Suffolk Structure Plan 2001 and Policy HS04 in the Babergh Local Plan afford adequate protection. In addition the Inspector felt that this area has no visual or recreational amenity value, and that it is its openness which is important. The open nature of the site will be sufficiently protected by the policies referred to above.

**PIM 3/36 para 3.41 Affordable Housing**

<b>Supports</b>		
Rep Nos	Issues	Response
R1131	Support proposed modification	Noted.

**PIM 3/37 para 3.41e Affordable Housing**

<b>Supports</b>		
Rep Nos	Issues	Response
R1132	Support proposed modification	Noted.

**PIM 3/38 para 3.41i Affordable Housing**

<b>Objections</b>		
Rep Nos	Issues	Response
R1185	Delete 'and should be negotiated with the District Council before a planning application is submitted'	The Council agrees with the Inspector that this text should remain in para 3.41i, following its removal from the policy.

**PIM 3/39 Policy HS08 Affordable Housing**

<b>Objections</b>		
Rep Nos	Issues	Response
R1178	Reinstate original Policy HS08 wording	Change made in response to Inspector's recommendation. Change considered appropriate as each site is different and the 20% minimum requirement might not always be justifiable or appropriate on the basis of need in that area and the scale and/or circumstances of the proposal. In any case, the Council retains the ability to negotiate up to a maximum of 35% and in each case the proven level of need will tend to be a critical factor.

**PIM 3/41 para 3.51 Housing Allocations**

<b>Objections</b>		
Rep Nos	Issues	Response
R1186	It is not clear why the table will not be updated	In many instances the exact number of dwellings will not be known until the planning application process is gone through as the density of some sites will vary, as indicated under the individual allocations. Some allocations may not proceed into the adopted local plan. It is therefore not possible to state the number of of dwellings in each category.
R1179	Reinstate table in paragraph 3.51 showing the greenfield / brownfield characteristics of the proposed housing allocations.	When the eventual housing allocations are known it would seem appropriate to reinstate this background / factual information. Until then there seems little or no point in doing so. This also demonstrates that the Plan may yet still change and that no final decisions can be known on some major issues. In any case, it is possible for anyone using the Plan to analyse the characteristics of the proposed allocations for themselves. Objector's point that calculating these numbers is inexact is not accepted (although some sites might be partly green and partly brownfield). Whilst the greenfield / brownfield split is useful, it might be appropriate to use a different form of classification for the other information contained here - such as the type of urban / rural location.

**PIM 3.43 HS09A(b) Head Lane/Broom Street, Great Cornard**

<b>Objections</b>		
Rep Nos	Issues	Response
R1183	Density of 50 dwellings to 0.6 hectares is too high	This is in line with Pre-Inquiry Changes. Objections to the PICs would have been heard at the Inquiry. The Inspector considered all the objections, location of the site and constraints, and in relation to the smaller site that resulted from the PICs and felt that maintaining the number of dwellings on the smaller site is satisfactory.

**PIM 3/47 Policy HS09G(a) Peoples Park, Sudbury**

Objections		
Rep Nos	Issues	Response
R84, R1217	Loss of informal open space	The principle of developing the land while retaining some open space was established some years ago. Peoples Park is not at present public open space, although it has been used for informal recreation. The District Council has been unable to secure the site for public open space. It is in a sustainable location for housing, well related to the town centre with good transport links. The Suffolk Wildlife Trust's survey concluded the site is of low ecological value, in any event the district council agrees with the Inspector that with a suitable management plan wildlife and public access could reasonably co-exist. In addition, the district council agrees with the Inspector that a Neighbourhood Equipped Play Area and a Local Equipped Play Area should be provided. The remainder of the area will consist of informal open space and will not be "sports" orientated. The district council supports the Inspector's view of the layout produced by The Landscape Partnership and the revised more flexible wording suggested for the policy.
R1073,	Objects to insertion of "a minimum" in front of "100 houses" in this policy as this would lead to too low a density on this site. Suggests this should be increased to a minimum of 200 houses.	The allocation is a total of 4.5 ha of which a minimum of 1.8 ha is to be open space, leaving a maximum of 2.7 ha for housing. The density range is an average, and a development of 40 dwellings per ha on 2.7 ha of land would result in 108 dwellings.

### PIM 3/48 Policy HS09H Grays Close Hadleigh

<b>Objections</b>		
Rep Nos	Issues	Response
R147, R152, R1191, R1194, R1196, R1201	Increase in amount of proposed housing.	The land to accommodate the additional dwellings is at the southern end of the site and was previously allocated for employment purposes. This allocation is served by a new road and roundabout junction on the A1071. The Inspector has reached a balanced judgement on the number and location of new dwellings required in the district during the plan period. There has been no removal of a Tree Preservation Order (TPO) within the housing and employment land allocation. The note at the foot of Policy HS09H in both the First and Second Deposit Drafts of the Local Plan Alteration No2 was inaccurate. Research was carried out during the course of the Local Plan Inquiry that established that there are no TPOs on the allocated site. However, the proposed policy wording (PIM No 3/48) together with the revised Inset Map 10 require the existing trees and hedgerows on the southern boundary to be retained, new landscaping to be provided on the eastern boundary and green/wildlife corridors particularly along the route of Footpath 24, and an area of public open space adjacent to The Wilderness is to be created.
R147, R152, R1196	Deletion of the TPO	There is no deletion of a TPO (see response above).
R1191	No improvements to by-pass	Road alterations are proposed (see response above).
R1191	No further public space	Additional public open space, landscaped areas and wildlife corridors are to be provided (see response above).
R1191	No improvements to parking	Parking standards for particular types of development are set out by Suffolk County Council. The relevant levels will be established as part of the planning application process.
R1191, R1194, R1196	Issues relating to precise building separation, boundaries, wildlife refuge, future TPOs	These would be considered as part of the planning application process.

## PIM 3/48 Policy HS09H Grays Close Hadleigh

<b>Objections</b>		
Rep Nos	Issues	Response
R1196	There is no indication that Ramsey Road or Lady Lane properties will benefit from landscaping	The structural landscaping proposed to be shown on Inset 10 and criteria set out in the proposed policy is more precise and offers more protection than the original wording of HS09H. There is no change proposed in respect of the area allocated for housing on the eastern part of the site - this objection should have been made before the Local Plan Inquiry.
R1201	Impact on residents of Durrants Farm	The development will be screened from Durrants Farm.
R1206 (1), R1071(2)	<p>1. Base Map of Hadleigh (Inset 10) on the web is inaccurate and further consultation is required.</p> <p>2. Discrepancy on map - changes proposed not consistent with the wording of the proposed changes to Policies HS09H and EM02b.</p> <p>Amendment suggested by objector relating to strategic landscaping notation on Inset 10.</p>	<p>1. The map has been produced with information from the Ordnance Survey as base information, Babergh is not in control of how up to date this information is. The wording on the link to the map specifically states that this map is to show the changes to policy EM02b and HS09H. The roundabout is mentioned in the final column of PIM 4/5. The dotted lines/arrows indicated are shown on the key as 'Local traffic...EM02b, HS09H'. The Map is intended to depict the changes to the HS09H and EM02b allocations, which when read in conjunction with the PIM document Schedule B and the Key is fully explained. No further consultation is required.</p> <p>2. The Council accepts that the coloured notation on the Grays Close allocations goes beyond what is indicated in Policies HS09H and EM02b, and reduces the size of the housing allocation. An amended version of Inset 10 has been prepared to reflect this minor change.</p>
<b>Supports</b>		
Rep Nos	Issues	Response
R1069	Supports PIM 3/48 the proposed re-wording of Policy HS09H - land off Grays Close, Hadleigh	Noted

**PIM 3/49 Policy HS09I Gallows Hill, Hadleigh**

<b>Supports</b>		
Rep Nos	Issues	Response
R9	Deletion of text	Noted

**PIM 3/50 Policy HS09J Shawlands Avenue Great Cornard, deletion of policy**

Objections		
Rep Nos	Issues	Response
R1055, R1056, R1059,R1065, R1066, R1067,	Visible impact of upper slopes being developed outweighs the visual impact on alternative site at Carsons Drive (PIM3/59). Number of dwellings could be reduced or park/play area moved and lower area only developed	The Inspector states in his Report (paragraphs 3.85.1 & 3.85.2) that the land forms a backdrop to Gt Cornard, and that the site is not screened from the west, which together with the 'terracing effect' would create an unacceptable visual impact. Government guidance directs that 30-50 houses per hectare should be used as standard. Play areas normally should be located in areas easily accessible to dwellings, in this case this includes the existing ones too.
R1055, R1056, R1059, R1065, R1066, R1067	There has been a misunderstanding re the location of children's play area. Access will result in improvement to the area. Cost of highway improvements lower than on alternative site at Carsons Drive (PIM3/59)	The Inspector discusses in 3.85.3 access to the site. It is this which he states is unsatisfactory and not the children's play area location.
R1055, R1056, R1059, R1065, R1066, R1067	Impact on biodiversity - Inspector relied on erroneous survey	The Council's sustainability appraisal (referred to by the objectors) includes other impacts beyond biodiversity. The site went through an Environmental Appraisal assessment in 2001 and was considered to be unacceptable for development for a number of reasons including the effect on biodiversity. An Ecological Survey was carried out by the Suffolk Wildlife Trust in 2003, and they found the site to be "valuable for its size and location", the black poplars are "of particular note and valuable to many species which rely on standing deadwood" and that the grassland "has its own intrinsic value". Connectivity with adjacent land is also considered to be important to the biodiversity value of this site. The biodiversity issue was one of several that lead the Inspector to his conclusion.

R1180	Reinstate site of original Policy HS09J if necessary (under the Council's existing housing requirements)	Site deleted as a result of clear Inspector's recommendation that this site is not appropriate for development and that an alternative site nearby is greatly preferable. In planning terms, this is clearly still the case. This site would be more damaging and harmful in its impact, including the loss of highly valuable TPO trees, as well as far greater adverse visual impacts, as a result of its greater height and the much greater steepness of the slope which it would ascend. No change.
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**PIM 3/52 Policy HS09P Maltings Farm Whatfield Road Elmsett**

<b>Objections</b>		
Rep Nos	Issues	Response
R53	The rush to decision	The District Council is satisfied that it has not contravened the Local Government Access to Information Act. Consideration of the Proposed Modifications took place initially at the Strategy Committee on 30th November 2005, and was referred to a meeting of the full Council on 13th December allowing sufficient time for Members to consider the background and reasoning behind each of the Proposed Modifications.
R53	The Inspectors reasoning	The Objector argues that the Inspector's reasoning is flawed in that Elmsett has the facilities to be considered a sustainable village, and compares the Elmsett recommendation with the Inspector's reasoning on a site in Great Waldingfield. Elmsett lacks a variety of employment opportunities which have potential for further development, and good journey to work transport links. The Maltings Farm site is outside the Built-Up Area Boundary of Elmsett, and the District Council supports the Inspector's view of the (PPG3) sequential approach to allocating sites for residential development, and therefore supports his reasoning and conclusions in respect of this site.
R53	Local Plan U Turn	The District Council supports the Inspector's reasoning and accepts that Elmsett is not a sustainable village (see above), and that it is inconsistent and unnecessary to allocate a site for housing.
R53	Prematurity	The Elmsett Mill site referred to by the Objector is a brownfield site within the Built-up Area Boundary where there is a presumption in favour of development. The Maltings Farm site, although also brownfield land is outside the Built-up Area Boundary for Elmsett. The decision to refuse permission for dwellings on the Maltings Farm site on the grounds of prematurity was soundly made, and the Objector had the option of appeal.

R53	No new policy direction	Part of the Maltings Farm site appears to still be in agricultural use (straw storage). Even if this is not the case and the buildings are redundant, Policies CR29 and CR30 encourages their retention and re-use for employment purposes. The Objector has not supplied any evidence to support the contention that the site has no future in employment or agricultural use.
R53	PPS 3 Housing Policy	The District Council considers that Elmsett has had sufficient 'windfall' housing on the Elmsett Mill site, a brownfield site within the Built-Up Area Boundary, and infilling within the Built-Up Area Boundary will be sufficient to provide for growth in this village over the Plan period.

**Schedule C PIM 3/53 Policy HS09Q Folly Road Great Waldingfield**

<b>Objections</b>		
<b>Rep Nos</b>	<b>Issues</b>	<b>Response</b>
R1082	Decision allows for retention of policy in current form contrary to PPG3 in respect of development density	Accept recommendation instead by adding explanation on density for this site. Add new supporting text after the policy to explain it: <b>'In considering development proposals for this site regard will be paid both to the need to make the most efficient use of land and to the most suitable development density for this particular site. Some constraints on the site are known, including the need to retain important landscape features, to incorporate further landscaping and the site's location where the village edge and open countryside meet. Other constraints are not yet known, including potential contamination. As a result, factors including the exact net developable area and the most appropriate development density cannot be identified precisely yet. The figures quoted in the policy are therefore notional estimates.'</b>

**PIM 3/55 Policy HS09T Land off Bourne Hill Wherstead**

<b>Objections</b>		
Rep Nos	Issues	Response
R17, R175, R1108	Loss of local amenity	The Objectors do not explain how an hotel and country park would lead to a "loss of local amenity". The District Council agrees with the Inspector's evaluation of the issues, and continues to support the creation of a country park at Wherstead, and the siting of a well-designed hotel. Sensitive development of this brownfield site will improve local amenity due to the current poor condition of the site.
R17, R1218	Potential increase in crime	The Objectors do not explain why the creation of a country park and the erection of an hotel would potentially lead to an increase in crime. Crime prevention and security measures are detailed matters that can be considered when/if an application is submitted. It is anticipated that appropriate management measures, including on-site wardening, will be a feature of the country park.
R17	Objection to Camp Yard	Camp Yard is an area of Ancient Semi-Natural Woodland with no potential for development. If included within the country park designation it could benefit from a management programme which would protect the biodiversity and landscape value of the site. Inclusion of this area would result in greater protection for the woodland.
R17, R175, R1091	New Hotel unnecessary	The Inspector sets out his reasoning behind the hotel allocation in paragraphs 3.95.6 and 3.95.7 of his report. The site at Wherstead is previously developed land, and within a natural 'bowl' in the landscape. It has the potential for good access from the A14 via Bourne Hill and The Strand. It is close enough to Ipswich to help meet the need for additional business hotel accommodation for the town as well as providing a good location for tourism and recreation. The East of England Tourist Board have supported the concept.

R17, R174, R175, R330, R331, R338, R1108, R1090, R1091, R1092, R1093, R1094, R1095, R1096, R1218	Highways/Traffic issues including traffic noise and air pollution	The proposed hotel site and areas to be included within the country park are well located in relation to the major road network and to Ipswich. The country park would be accessible on foot, and by cycle and public transport, as well as by car. The Inspector has indicated that if improvements to the junction of the A137 and B1456 are considered necessary for the hotel development this would be a detailed matter to be dealt with at the planning application stage when the scale of the overall development can be assessed. At this stage it is not envisaged that there would be open access to the Ancient Semi-Natural Woodland at Camp Yard for the general public. Due to the nature of this area of woodland public access is likely to be restricted, and only essential parking and manoeuvring space would be required.
R174	Previously used land is not sufficient justification for use as hotel location.	The hotel provides an opportunity to sensitively re-develop this derelict site, to the benefit of the visual amenities of the locality and this part of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty.
R174	Alternative site near the junction of A137 and A14 interchange has more merit, is less intrusive on AONB, and could be conditional on providing new roundabout and safe access to the Bourne Hill Ski Centre and provide parking and safe access to the proposed 'Country Park'	The cost of providing access on or near this junction would be prohibitively high. The proposed hotel utilises a brownfield site with the potential for a good access onto the B1456. The volume of traffic would not be so great that the Bourne Bridge roundabout junction would be adversely affected. A new access from or close to the A137 and A14 junction may be visually intrusive due to the topography of the area.
R175, R330, R338, R1090, R1091, R1092, R1093, R1094, R1218	Countryside/Landscape AONB	There are strict policies in place to protect the landscape, in particular regarding the AONBs and biodiversity. Similarly with light pollution.
R175, R331, R338, R1108, R1090, R1091, R1092, R1093, R1095, R1096	Light and noise pollution	See above - similar policies are in place to protect against light and noise pollution.

R175, R338, R1091, R1092	Wildlife	The country park designation will provide additional and protect existing wildlife habitats. It is also anticipated that the site will have wardens who will help ensure protection of wildlife areas and provide education to the public on wildlife and habitat issues. The site of the hotel allocation has very limited wildlife value and any impacts from it can be examined and controlled through the detailed planning application stage.
R330, R338, R1218	Open doorway to future development	There has long been pressure for development on the fringes of Ipswich as demonstrated by the piecemeal introduction of the ski slope and golf driving range nearby, and by numerous applications made on behalf of the Pauls Estate around Wherstead. This allocation meets a specific need, and will not set a precedent for future development in the AONB. Creation of the country park will provide the opportunity to secure protection of the countryside, in particular the AONB in perpetuity.
R1075	PPS6 tests do not appear to have been applied to the selection of this site for an hotel. GoEast recommend deletion of the hotel allocation unless robust evidence can demonstrate that PPS6 tests have been followed.	Points on PPS6 and sequential approach noted. Any hotel proposals for this location will be subject to the need to demonstrate compliance with the sequential approach of PPS6 before being contemplated for the grant of planning permission. Question of need addressed by Tourist Board evidence citing a shortage of accommodation in this area. Scale has also been addressed (26-50 bedroom range). Accessibility by choice of transport modes also satisfied, as relationship with Ipswich centre is good and reasonable bus services serve the site. Evidence to address the Sequential Approach and impact on existing centre would be required as part of evidence to support any planning application. Addition to paragraph 8.30a recommended to cover these points: <b>'Any hotel proposals for this location will need to satisfy the requirements and tests of PPS6: Planning for Town Centres.'</b>
R1108, R1091, R1095, R1096	Control and management and cost of maintenance of the country park on council tax payer	Arrangements for control, management and maintenance would need to be established and governed by a legal agreement at the planning application stage and would not necessarily be at the expense of the Council Tax payer. There are other means to address these concerns. Not a planning issue that necessitates deletion of the allocation.

R1089 (Paul Family)	Inflexibility of hotel location	The objectors specifically earmarked this site location in their evidence to the Inquiry. Having said this, the plan for this proposal is indicative and merely states 'approximate location' and therefore allows for any situations where an alternative is demonstrably preferable. As the only previously developed, and most unsightly land in the locality, this indication of a likely site seems appropriate.
R1089 (Paul Family)	Allocation of 30 hectares of land for Country Park allocation without the development package put forward at the Local Plan Inquiry	Deletion of country park sought. The basis for this point is recognised, as the country park would need to be delivered and its upkeep facilitated by other means, as suggested by the supporting text. Hotel not proposed to deliver the country park anyway. This point does not demonstrate the case for its deletion.
R1091	Devaluation, and effect on property	Private property interests not within remit of planning system. Subjective view - no evidence for devaluation in any case
R1093	New park unnecessary	Disagree, as this would provide for residents of both Ipswich and Babergh in an area affected by substantial future growth proposals (Ipswich). Demand for recreational space beyond the town will clearly increase significantly and this location is very well suited for this purpose.
R1093, R1095, R1096	Enabling development, hotel size would not fund Country Park upkeep	This is recognised, as the country park would need to be delivered and its upkeep facilitated by other means, as suggested by the supporting text. Hotel not proposed to deliver the country park anyway
R1093	Design of hotel	Design does not need addressing at this stage; the policy deals with the principle of development. Design addressed at detailed planning application stage.

R1095, R1096	Areas of land not linked and do not appear to fit together to create suitable or sustainable Country Park	Procedurally, the hotel and country park proposal were put forward at 1st Deposit stage; objections to these proposals were invited and could be made back then. As the objector promoted these at Inquiry, objections to that position could still be put to the Inquiry and any outstanding objections to these proposals would have been considered by the Inspector during the Inquiry, as indeed he took into account all such objections. The land parcels for a country park are considered suitable for this purpose and could be sought for delivery in phases accordingly. The current proposal does not involve enabling development as such, so this point is not an issue to consider now. The scale of hotel and its impacts will be assessed carefully at the detailed planning application stage if this proposal ever does come about. Highways access arrangements and scale of development will be considered in conjunction with the County Council Transport authority.
R1095	Concerns over development of parcels of land not included as part of proposal	These land parcels do not form part of these proposals and therefore cannot be considered as part of them. The proposals do not presuppose that the development of such land would be acceptable.
R1095	Questionable whether it is a brownfield site	The site is previously developed land, contrary to the claim in this objection. Whether or not the site should have been restored to agriculture after its construction use, the reality is that it is and remains developed. It also still has extensive hardstandings and several sizeable buildings on it.
<b>Supports</b>		
Rep Nos	Issues	Response
R1190	It will clear and landscape the area	Noted
R1190	It might provide employment for the village	Noted
R1190	Would support a larger hotel of up to 100 beds	Noted

**PIM 3/57 Policy HS03 Capel St Mary**

<b>Objections</b>		
Rep Nos	Issues	Response
R1084	Objects to word "substantially" - needs to be quantified or removed. Alternative wording suggested	Whilst understanding this objection - "the success of employment allocation cannot be guaranteed until driven by demand", the suggested alternative wording would not convey the additional sustainable element that development (rather than allocation) would bring to the village.

**PIM 3/58 Glemsford Housing Omission Site Proposals**

<b>Objections</b>		
Rep Nos	Issues	Response
R142	Biodiversity	An ecological survey is required to be submitted before, or as part of a detailed application.
R142,	Loss of Local Amenity	The site is currently in private ownership, and is not public open space. The proposed policy requires 0.5 ha of public open space, and retention and enhancement of the perimeter landscaping. In addition, a public footpath through the development linking to the allotments and Fair Green is also required.
R142, R164, R178, R180, R181, R182, R196, R326, R327, R328, R329, R332, R335, R339, R340, R342, R982, R983, R984, R985, R986, R988, R989, R990, R991, R992, R993, R994, R995, R996, R997, R998, R999, R1000, R1001, R1002, R1003, R1005, R1006, R1007, R1008, R1009, R1010, R1011, R1012, R1013, R1014, R1015, R1016, R1017, R1018, R1019, R1057, R1058	Highways - including issues such as congestion, inadequacy of infrastructure, poor visibility, speed, noise, safety (including during construction).	Highway improvements to facilitate safe access are required, and access and highway matters would be considered at the application stage when details of the layout etc. are known.

R980 - Highways Authority	Proposed criteria on highway access is not precise. Highway Authority cannot see what improvements can be made within the existing land available to overcome the lack of visibility at the junction of Crownfield Road and Brook Street.	It is proposed to add a note after the policy to indicate that notwithstanding any physical improvements that it may be possible to achieve, the minimum requirement will be that the developer should promote any Traffic Orders necessary to achieve the traffic management measures envisaged by the Inspector in paragraph 3.96.11.10 of his Report.
R142, R182, R985, R986, R1057	Poor drainage on site	A Flood Risk Assessment is required with any planning application, and drainage matters would be dealt with when details of the proposal are known. Anglian Water have been consulted.
R164, R179, R180, R41, R995,	Overdevelopment	Glemsford is the second largest village in the district and as a sustainable village is suitable to accept an allocation of housing. An additional 45 - 60 dwellings will not lead to overdevelopment of the village, and the number proposed meets the requirements of Government policy as set out in PPG3: Housing.
R178, R181, R332, R341, R346, R1006, R1007, R1009, R1010, R1011,	Impact of high density housing on residents of surrounding area	The site proposed for development with between 45 to 60 dwellings is large enough to provide a good environment for the proposed development with an area of public open space and protection and enhancement of the perimeter landscaping. Glemsford is a sustainable village which can absorb this level of proposed growth.
R178, R1000	Loss of wildlife area.	An ecological survey is required to be submitted before, or as part of a detailed application.
R179, R180, R182, R324, R325, R326, R327, R328, R329, R332, R333, R335, R336, R339, R341, R346, R982, R983, R984, R985, R986, R988, R989, R990, R991, R992, R993, R994, R995, R996, R997, R998, R999, R1000, R1001, R1002, R1003, R1005, R1006, R1007, R1008, R1009, R1010, R1011, R1012, R1013, R1014, R1015, R1016, R1017, R1018, R1019, R1068, R1058	Sewage flooding and drainage	Anglian Water has been consulted. The site does not lie in a flood risk area. Due to its size a Flood Risk Assessment is required to be carried out to ensure that surface water run-off does not cause flooding. SUDs will be encouraged. Any development of the site would only be allowed if sewage and drainage can be adequately dealt with, and any additional or upgrading works required would be provided at the developer's expense.

R180, R336, R341, R982, R1007, R1009, R1010, R1011, R1014, R1015,	Character of the village	Glensford is the second largest village in the district with a 2001 population of 3,286 living in 1,349 households. As a sustainable village it is suitable to accept an allocation of housing. An additional 45 - 60 dwellings represents a household growth of between 3.3% and 4.4%, and will not lead to overdevelopment of the village, and the number proposed meets the requirement to provide sufficient housing in villages as well as towns. The site is well related to the village and would not be intrusive.
R196	Conservation Area	The proposal site is outside the Glensford Conservation Area.
R982, R1004,	Noise & Pollution	There will inevitably be an increase in traffic volume and consequently vehicle noise and emissions. This is the case in any development and will not be more of a problem in this location than any other residential area.
R327	Public footpath	The proposed policy requires provision of a public footpath through the development to link with the existing public footpath network. The existing footpath link to facilities in the village will be of benefit to occupants of the proposed dwellings. The District Council encourages access on foot and by bicycle within housing sites, and between areas of housing and work, schools, shops, and other facilities/amenities.
R328, R329, R340, R346, R983, R988, R990, R992, R996, R999, R1005, R1013, R1014, R1019, R1057, R1058	Local Services	The expected increase in population arising from 45 - 60 dwellings would not be of a scale to 'overload' the school, doctors and other social infrastructure of the village.
R333	No adopted roads to site	This matter would need to be satisfactorily resolved before development is allowed to proceed.
R346, R1004, R1005, R1006,	Housing type in condensed area	This objection may be a result of mis-information circulating in the village. The housing type, i.e. style/design will be considered at the planning application stage. Development will be in line with advice in PPG3 and will include up to 35% affordable housing the tenure of which will be determined at the planning application stage.
R995	Better/preferable sites off A1092	The Inspector considered the Crownfield Road site as an "Omission site" at the Local Plan Inquiry. No other sites in Glensford were before him. Objections putting forward sites in Glensford should have been made at the appropriate time so that they could have been considered by the Inspector.

R10161	Objection from adjacent landowner - road to be completed before building commences on the allocated site	This is a matter for the landowners/developers to resolve. Objection stems from a planning permission and agreement with the Highways Authority that is around 30 years old. Today developers are usually required to complete a legal agreement with the Transport Authority to ensure roads are completed and adopted before developments are completed. Matters such as this are now routinely dealt with through the development control process.
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**PIM 3/59 Omission site Carsons Drive Great Cornard**

Objections		
Rep Nos	Issues	Response
<p>R1, R2, R13, R14, R15, R16, R18, R19, R42, R44, R45, R50, R61, R66, R67, R70, R82, R92, R95, R96, R100, R101, R126, R130, R131, R136, R144, R160, R162, R165, R168, R170, R185, R187, R193, R199, R201, R204, R207, R208, R219, R231, R234, R235, R236, R237, R238, R242, R243, R246, R249, R252, R253, R255, R258, R262, R263, R266, R267, R274, R278, R279, R281, R287, R289, R292, R297, R300, R301, R295, R306, R308, R314, R320, R343, R348, R349, R350, R357, R362, R364, R365, R367, R370, R372, R375, R378, R381, R383, R385, R390, R393, R395, R397, R399, R401, R403, R410, R412, R416, R420, R422, R424, R425, R427, R429, R430, R434, R435, R437, R440, R441, R447, R450, R453, R454, R457, R460, R461, R462, R464, R468, R470, R474, R475, R476, R478, R481, R483, R488, R490, R493, R494, R498, R500, R505, R527, R529, R530, R531, R532, R534, R535, R537, R540, R541, R543, R555, R561, R567, R569, R575, R576, R578, R585, R587, R590, R592, R606, R621,</p> <p>R626, R627, R631, R632, R633, R634, R635, R637, R650, R652, R654, R657, R659, R661, R663, R668, R670, R674, R676, R680, R682, R686, R689, R692, R695, R696, R699, R701, R704, R706, R708, R713, R910, R911, R918, R923, R925, R927, R930, R939, R942, R946, R949, R951, R953, R954, R955, R956, R967, R968, R1024, R1026, R1028, R1035, R1037, R1042, R1044, R1045, R1048, R1051, R1053, R1120, R1188, R1189, R1208, R1210, R1212, R1213, R719, R722, R732, R735, R737, R739, R744, R751, R756, R758, R762, R765, R768, R770, R772, R774, R778, R782, R788, R789, R791, R794, R801, R805, R809, R814, R812, R818, R819, R822, R827, R830, R833, R837, R841, R842, R843, R844, R846, R849, R850, R852, R856, R859, R862, R880, R882, R884, R886, R894, R895, R897, R903, R906, R1216, R1119, R929, R941, R909,</p>	<p>Highways, increased levels of traffic, congestion, highway safety, high levels of unsustainable car journeys/parking problems in Sudbury</p>	<p>Highway improvements are proposed for the access into the site on the C732, and from there to the junction with Carsons Drive. The Council will work with the Transport Authority to find specific measures to prevent the use of the C732 as a short-cut/"rat run" to the A134.</p>

<p>R1, R2, R13, R14, R16, R18, R19, R21, R26, R27, R29, R30, R31, R33, R34, R35, R41, R42, R44, R45, R47, R48, R50, R52, R55, R58, R59, R61, R63, R64, R65, R66, R67, R70, R74, R82, R85, R88, R89, R91, R92, R93, R96, R97, R104, R105, R106, R107, R109, R114, R115, R117, R124, R128, R130, R131, R132, R136, R139, R141, R145, R146, R153, R160, R162, R165, R167, R168, R170, R184, R185, R189, R191, R193, R199, R201, R204, R207, R208, R209, R210, R213, R214, R219, R220, R221, R222, R227, R228, R229, R230, R231, R232, R233, R235, R236, R237, R238, R239, R242, R243, R246, R248, R252, R253, R255, R260, R262, R269, R270, R278, R279, R283, R285, R289, R291, R294, R297, R300, R301, R306, R307, R312, R314, R348, R350, R355, R357, R359, R360, R362, R370, R373, R375, R378, R379, R381, R383, R385, R392, R393, R395, R397, R399, R401, R403, R406, R410, R412, R414, R416, R420, R422, R424, R425, R427, R430, R434, R435, R437, R441, R444, R445, R447, R453, R454, R455, R457, R460, R461, R462, R464, R466, R470, R471, R472, R474, R476, R478, R480, R481, R486, R500, R505, R507, R510, R511, R513, R518, R521, R522, R524, R527, R529, R531, R650, R652, R654, R657, R659, R661, R663, R668, R676, R680, R682, R692, R696, R699, R701, R704, R706, R708, R714, R717, R719, R727, R735, R737, R739, R742, R744, R745, R746, R748, R749, R751, R753, R754, R755, R768, R770, R772, R774, R778, R782, R784, R787, R788, R793, R794, R798, R809, R810, R818, R819, R822, R827, R830, R831, R837, R838, R839, R841, R842, R843, R844, R846, R849, R850, R852, R859, R862, R873, R874, R876, R880, R882, R886 R910, R911, R918, R919, R923, R925, R927, R930, R939, R942, R949, R951, R952, R953, R954, R955, R956, R967, R968, R1120, R1188, R1189, R1208, R1210, R1213, R1216, R941</p>	<p>Effect on, lack of local services/infrastructure/local amenities - general</p>	<p>The Education Authority (Suffolk County Council) have confirmed that the primary, middle and upper schools (including 6th form places) have sufficient capacity to cope with the expected numbers of pupils likely to be generated from the proposed allocation. The District Council has not been informed of any problems of capacity with healthcare provision for the number of people expected to occupy the proposed new homes.</p>
<p>R1, R2, R13, R15, R16, R18, R19, R21, R27, R29, R30, R31, R33, R34, R35, R41, R47, R48, R55, R58, R59, R61, R63, R64, R65, R66, R68, R70, R73, R74, R77, R82, R85, R88, R89, R91, R92, R93, R95, R97, R104, R107, R109, R115, R116, R117, R124, R126, R128, R129, R132, R136, R137, R139, R141, R144, R145, R146, R153, R165, R167, R168, R170, R184, R187, R189, R191, R193, R195, R204, R207, R208, R209, R210, R217, R219, R222, R227, R228, R229, R230, R231, R232, R233, R234, R235, R237, R241, R243, R246, R248, R252, R253, R255, R259, R260, R262, R263, R269, R274, R279, R287, R289., R291, R292, R294, R295, R306, R307, R308, R310, R315, R317, R323, R337, R342, R344, R345, R350, R352, R357, R359, R360, R378, R379, R381, R383, R388, R389, R392, R393, R395, R403, R410, R416, R424, R425, R434, R435, R437, R441, R444, R453, R455, R457, R461, R462, R464, R466, R468, R470, R471, R472, R475, R480, R481, R483, R486, R488, R493, R494, R504, R505, R507, R510, R511, R513, R518, R521, R522, R524, R530, R531, R537, R544, R546, R555, R558, R560, R561, R565, R566, R567, R569, R571, R575, R576, R578, R584, R589, R601,</p>	<p>Visual intrusion into the countryside &amp; impact on the landscape and protected trees. Impact on public footpaths and visual amenity of users. New housing will dominate surrounding housing.</p>	<p>Matter considered in detail by the LP Inspector. The topography of the land and the amount and location of the open space and woodland planting will minimise and mitigate the effect on the locality, the countryside beyond, and on the public footpaths in the locality. Housing is proposed west of a ridgeline in a natural dip. Claims that adverse landscape impacts are 'inevitable' are not accepted and not demonstrated by the available evidence. The height of houses and the effect of height, position, design and position of windows etc on neighbouring residential amenity are detailed matters for the planning application/development control process</p>

<p>R602, R622, R606, R610, R619, R621, R631, R632, R633, R634, R635, R637, R640, R656, R657, R672, R676, R679, R684, R686, R689, R696, R699, R701, R702, R717, R720, R724, R727, R731, R734, R735, R737, R739, R746, R749, R751, R753, R754, R755, R756, R758, R760, R768, R770, R772, R774, R778, R783, R784, R788, R789, R794, R807, R823, R825, R831, R835, R836, R839, R841, R843, R844, R846, R849, R850, R852, R859, R862, R863, R870, R882, R886, R903, R906, R913, R915, R923, R925, R927, R936, R937, R939, R940, R942, R945, R952, R964, R971, R972, R974, R975, R1024, R1025, R1037, R1040, R1041, R1044, R1045, R1048, R1051, R1053, R1120, R1188, R1189, R1208, R1210, R1212, R1213, R1214, R1215, R929, R941, R878, R408</p>		
<p>R18, R19, R29, R30, R33, R34, R41, R42, R45, R48, R52, R58, R59, R63, R64, R65, R66, R73, R74, R82, R85, R89, R91, R93, R104, R109, R117, R124, R129, R132, R153, R160, R165, R185, R187, R189, R191, R193, R207, R209, R210, R214, R217, R219, R222, R227, R228, R229, R230, R232, R233, R236, R252, R258, R262, R263, R270, R278, R279, R283, R285, R297, R300, R306, R308, R312, R315, R355, R357, R359, R372, R378, R379, R381, R383, R390, R397, R399, R403, R424, R430, R431, R435, R437, R440, R441, R444, R447, R448, R453, R455, R462, R470, R471, R472, R475, R480, R481, R486, R488, R494, R497, R501, R505, R507, R510, R511, R513, R518, R521, R522, R524, R527, R537, R544, R558, R560, R561, R567, R578, R584, R585, R591, R601, R602, R604, R608, R610, R612, R614, R619, R621, R622, R631, R632, R633, R634, R635, R637, R638, R644, R646, R648, R657, R668, R672, R676, R679, R684, R686, R696, R699, R701, R702, R704, R713, R714, R722, R724, R729, R731, R734, R735, R737, R739, R748, R751, R756, R758, R770, R772, R774, R778, R784, R786, R788, R789, R791, R799, R805, R807, R812, R814, R823, R825, R830, R833, R839, R841, R843, R844, R846, R849, R850, R852, R865, R882, R886, R906,</p> <p>R913, R915, R923, R925, R927, R930, R936, R937, R940, R942, R945, R946, R949, R951, R952, R953, R954, R955, R956, R964, R971, R972, R1024, R1025, R1028, R1031, R1033, R1037, R1040, R1041, R1048, R1051, R1053, R1119, R1188, R1189, R878</p>	<p>SLA designation</p>	<p>Land not a designated SLA, it is only a PROPOSED SLA and this proposal was objected to. Accordingly, the proposed designation cannot carry much weight. The proposed area for new housing is in a dip west of a ridge, and the land falls away west of this ridge. This area of land is situated between the eastern edge of Great Cornard and south of a dense area of housing to the north of Sheepshead Hill, where the built-up nature of Great Cornard forms a hard 'edge' to the farmland beyond. The SLA designation is proposed to protect the attractive countryside, and this will not be affected by development of a relatively small area situated between two built-up areas and predominantly at a lower level than the better quality SLA land to the east and south. The District Council agrees with the Inspector that the area to be allocated for housing should not be part of the proposed SLA.</p>
<p>R19, R82, R100, R101, R136, R144, R234, R237, R253, R255, R362, R447, R454, R457, R530, R621, R637, R746, R939, R1044, R1053, R1063, R1208, R1210,</p>	<p>Pollution - light/ air/ noise - Impact on residential amenity</p>	<p>Any new development will have an impact in terms of light/air/noise on residential amenity. National policy set out in PPGs and PPSs, and Local Plan policies are used to control development to minimise and mitigate the effects of new development at the application stage.</p>

<p>R19, R96, R98, R99, R162, R165, R170, R187, R189, R191, R193, R195, R207, R217, R219, R221, R236, R252, R258, R259, R262, R263, R279, R281, R292, R308, R321, R337, R360, R372, R381, R383, R390, R397, R399, R406, R412, R416, R422, R424, R425, R430, R431, R435, R437, R441, R447, R448, R450, R453, R454, R470, R474, R481, R488, R490, R493, R494, R505, R531, R537, R541, R544, R555, R561, R567, R575, R576, R578, R585, R590, R592, R594, R596, R606, R608, R610, R612, R614, R621, R631, R632, R633, R634, R635, R637, R648, R657, R659, R663, R674, R676, R680, R684, R686, R692, R695, R696, R699, R701, R704, R713, R714, R719, R720, R722, R735, R737, R739, R745, R751, R751, R756, R758, R770, R772, R788, R799, R801, R812, R814, R818, R819, R823, R830, R831, R833, R835, R836, R839, R841, R844, R846, R849, R850, R852, R858, R865, R867, R871, R882, R886, R897, R899, R901, R903, R903, R921, R925, R931, R932, R940, R942, R949, R951, R952, R967, R1026, R1031, R1037, R1048, R1051, R1053, R1063, R929, R941, R909</p>	<p>Outside BUAB/Greenfield precedent/Development in the Greenbelt</p>	<p>The proposed housing allocation is on greenfield land outside the Built-Up Area Boundary. The District Council has been unable to find sufficient previously developed land to accommodate the number of dwellings that need to be provided during the plan period. This has resulted in the need to find suitable greenfield sites on the edge of built-up areas. Babergh has no land designated as Green Belt</p>
<p>R27, R238, R475, R856, R952, R1053,</p>	<p>Loss of high grade agricultural land</p>	<p>Land is likely to be Grade 3 a or b quality, which is relatively high quality. Defra / GO East consulted but no comments or objections received in respect of agricultural land loss. 4.1ha. to remain in agricultural use and other land east of ridgeline would remain capable of reversion to agriculture if required in future. Letter received from landowner citing problems of trespass on land and misuse through rubbish dumping. Its use / value for agriculture has thus been diminished</p>
<p>R27, R29, R30, R33, R34, R41, R48, R55, R58, R59, R63, R64, R65, R73, R74, R85, R89, R91, R93, R104, R109, R117, R124, R130, R131, R132, R136, R141, R143, R153, R183, R209, R210, R214, R222, R227, R228, R229, R230, R232, R237, R295, R352, R359, R364, R444, R455, R471, R472, R480, R486, R507, R510, R511, R513, R518, R521, R522, R524, R530, R550, R558, R560, R564, R584, R601, R602, R619, R679, R622, R702, R720, R724, R729, R731, R734, R783, R786, R787, R807, R825, R849, R858, R891, R894, R913, R915, R936, R937, R945, R952, R964, R971, R972, R1025, R1040, R1053, R1213, R878</p>	<p>Biodiversity &amp; Ecological considerations/Independent wildlife survey not carried out/ will result in destruction of badgers' sett. Environmental impact assessment should be carried out.</p>	<p>The policy requires "general ecological enhancement" along the ridgeline together with woodland planting. Existing trees on the southwestern boundary are protected by TPO. The remainder of the site is in agricultural use. Of the 16ha allocation approximately one quarter of the area will remain in agriculture, 4.5ha will be open space, and 3ha will be woodland. Thus some existing habitats will be retained and new habitats created. As the majority of the site is farmland under cultivation its biodiversity value is limited.</p>
<p>R27, R45, R85, R96, R392, R939</p>	<p>No employment for new residents</p>	<p>The proposal has no imperative or requirement to provide its own employment on site. Employment opportunities on a significant scale are already available nearby in Great Cornard and Sudbury. Indeed, this urban area is the district's commercial / employment centre, with the most employment opportunities</p>

<p>R16, R29, R30, R33, R34, R41, R47, R48, R55, R58, R59, R63, R64, R65, R67, R73, R74, R85, R88, R89 R91, R93, R95, R95, R97, R104, R109, R117, R124, R132, R134, R139, R141, R153, R162, R165, R167, R168, R170, R183, R185, R187, R189, R191, R193, R195, R199, R207, R209, R210, R213, R214, R219, R220, R221, R222, R227, R228, R229, R230, R232, R233, R236, R239, R241, R243, R246, R252, R253, R255, R262, R263, R269, R273, R274, R278, R279, R283, R285, R287, R289, R291, R292, R295, R297, R300, R304, R306, R308, R310, R314, R315, R317, R321, R323, R345, R348, R350, R355, R357, R359, R362, R364, R365, R367, R369, R372, R373, R375, R378, R379, R381, R383, R385, R390, R401, R403, R406, R410, R414, R424, R430, R434, R435, R437, R440, R441, R444, R445, R447, R448, R453, R455, R457, R460, R461, R462, R464, R466, R468, R470, R471, R472, R474, R480, R481, R486, R488, R493, R494, R499, R500, R501, R505, R507, R510, R511, R513, R518, R521, R522, R524, R527, R529, R530, R537, R540, R544, R550, R551, R553, R555, R558, R560, R561, R565, R566, R567, R571, R575, R576, R578, R579, R584, R587, R589, R591,</p> <p>R592, R594, R596, R601, R602, R604, R608, R610, R612, R614, R619, R621, R622, R626, R627, R631, R632, R633, R634, R635, R637, R642, R643, R644, R646, R657, R668, R670, R672, R674, R676, R679, R684, R686, R689, R692, R695, R696, R699, R701, R702, R704, R706, R708, R713, R714, R717, R719, R720, R722, R724, R729, R731, R732, R734, R735, R737, R744, R745, R751, R755, R756, R758, R760, R762, R765, R770, R772, R774, R777, R778, R782, R783, R784, R786, R787, R788, R789, R791, R793, R794, R798, R801, R803, R805, R807, R809, R810, R812, R814, R822, R823, R825, R827, R830, R831, R833, R839, R841, R843, R844, R846, R849, R850, R852, R856, R859, R862, R863, R865, R873, R874, R876, R882, R884, R886, R887, R889, R895, R897, R899, R901, R903, R905, R906, R910, R913, R915, R921, R925, R936, R937, R940, R942, R945, R952, R953, R954, R955, R956, R964, R971, R972, R974, R975, R1024, R1025, R1026, R1028, R1031, R1033, R1035, R1037, R1040, R1041, R1042, R1043, R1045, R1048, R1051, R1053, R1063, R978, R1188, R1189, R1208, R1210, R1212, R1214, R941, R909, R878</p>	<p>Destruction of heritage/loss of Gainsborough views/Impact on Abbas Hall. English Heritage not consulted.</p>	<p>English Heritage have submitted R978 objecting to the site. However they have incorrectly identified the site and not undertaken a thorough investigation of the evidence, leading to a flawed objection. Effect on setting of (listed) Abbas Hall considered carefully through evidence before Inquiry, by Inspector at the LPI - no demonstrable adverse impact. Loss of Gainsborough views not a clearly material planning consideration and not demonstrated by the available evidence in any case. English Heritage were consulted (and almost failed to respond in time)</p>
<p>R29, R30, R33, R34, R41, R47, R48, R55, R58, R59, R63, R64, R65, R74, R85, R89, R91, R93, R104, R109, R115, R117, R124, R132, R141, R153, R167, R209, R210, R214, R222, R227, R228, R229, R230, R231, R232, R233, R291, R355, R359, R392, R540, R546, R571, R575, R576, R604, R619, R622, R637, R679, R680, R702, R720, R724, R729, R731, R734, R783, R786, R807, R825, R849, R913, R921, R936, R937, R945, R957, R959, R961, R964, R971, R972, R1188, R1189, R1208, R1210, R1215, R878</p>	<p>Impact upon community/local facilities e.g. shops/ public amenity</p>	<p>Traders are unlikely to agree with objectors who have said that local shops will not be able to cope with the additional population. On the contrary, additional population will add to the viability and sustainability of such local facilities and amenities. This point is more akin to an expression of support</p>

<p>R29, R30, R33, R34, R41, R47, R48, R58, R59, R63, R64, R65, R73, R74, R85, R89, R91, R93, R104, R109, R117, R124, R132, R141, R153, R209, R210, R222, R227, R228, R229, R230, R232, R233, R269, R359, R444, R455, R471, R472, R480, R486, R507, R510, R511, R513, R518, R521, R522, R524, R558, R560, R584, R601, R602, R619, R679, R702, R720, R724, R729, R731, R734, R807, R825, R825, R849, R869, R913, R915, R936, R937, R945, R964, R971, R972, R1025, R1040, R878</p>	<p>Other planning issues</p>	<p>This is a 'catch-all' category in a flyer enclosed with many of the representations, and of the six bullet points three are opinions or statements, and three are covered elsewhere in this spreadsheet.</p>
<p>R29, R30, R33, R34, R41, R48, R55, R58, R59, R63, R64, R65, R73, R74, R85, R89, R91, R93, R104, R109, R117, R124, R132, R141, R153, R162, R165, R168, R185, R189, R191, R193, R199, R201, R207, R209, R210, R222, R227, R228, R229, R230, R232, R233, R236, R295, R262, R263, R278, R279, R285, R292, R301, R304, R306, R308, R355, R359, R365, R367, R372, R381, R390, R393, R395, R397, R399, R420, R422, R424, R425, R431, R435, R437, R441, R444, R447, R453, R455, R471, R472, R480, R481, R486, R494, R501, R505, R507, R510, R511, R513, R518, R521, R522, R524, R529, R534, R535, R537, R551, R558, R560, R561, R567, R569, R571, R575, R576, R578, R584, R585, R589, R592, R594, R601, R602, R606, R608, R617, R619, R621, R622, R631, R632, R633, R634, R635, R637, R654, R657, R659, R661, R663, R672, R679, R686, R692, R695, R696, R699, R701, R702, R714, R913, R915, R918, R940, R942, R945, R939, R951, R953, R954, R955, R956, R964, R971, R972 R1025, R1028, R1033, R1035, R1037, R1040, R1045, R1048, R1051, R1063, R720, R722, R724, R727, R729, R731, R734, R735, R737, R756, R758, R762, R770, R772, R774, R778, R786, R788, R791, R794, R807, R812, R814, R822, R823, R825, R830, R833, R841, R843, R844, R846, R849, R850, R852, R869, R878, R882, R886, R906, R941, R909,</p>	<p>Sustainability/the sequential approach/Contravention of PPG3 - inefficient use of land</p>	<p>The site is in a sustainable location on the edge of Great Cornard and close to Sudbury. Urban Capacity Study carried out in 2002. Brownfield sites in both Great Cornard and Sudbury have been identified, allocated and brought forward for development. Sequentially, once brownfield sites are used up greenfield sites on the edges of settlements can be identified. As an edge-of-settlement site it is well related to the existing settlement. The number of dwellings allocated, 170, on 4.4ha is a gross density of around 38 dwellings per ha, well within the density requirements of PPG3.</p>
<p>R29, R30, R33, R34, R41, R48, R58, R59, R63, R64, R65, R73, R74, R85, R91, R93, R104, R109, R117, R124, R132, R139, R141, R153, R185, R209, R210, R222, R227, R228, R229, R230, R232, R233, R359, R364, R444, R455, R471, R472, R480, R486, R507, R510, R511, R513, R518, R521, R522, R524, R530, R558, R560, R584, R601, R602, R619, R622, R679, R702, R913, R915, R945, R952, R964, R971, R972, R1025, R1040, R1053, R720, R724, R729, R731, R734., R807, R825, R849, R878</p>	<p>Due process/ good governance/democratic process ignored.</p>	<p>Not planning issues. Not demonstrated with any evidence: these are subjective / conjectural claims and they are strongly disagreed.</p>

R29, R30, R33, R34, R41, R48, R57,R58, R59, R63, R64, R65, R73, R74, R85, R89, R91, R93, R104, R109, R117, R119, R124, R128, R132, R141, R153, R209, R210, R222, R227, R228, R229, R230, R232, R233, R235, R253, R272, R294, R315, R337, R359, R364, R379, R393, R444, R455, R460, R464, R471, R472, R475, R476, R478, R480, R486, R501, R507, R510, R511, R513, R518, R521, R522, R524, R525, R541, R543, R553, R558, R560, R565, R569, R571, R584, R601, R602, R619, R622, R626, R650, R652, R668, R679, R702, R720, R724, R729, R731, R734, R748, R783, R807, R825, R825, R849, R884, R903, R913, R915, R945, R952, R953, R954, R955, R956, R964, R971, R972, R1025, R1040, R1063, R878	Overdevelopment of Great Cornard & Sudbury	This objection largely repeats issues raised concerning the cumulative increase in housing resulting in an increase in traffic movements affecting parking, the historic core of Sudbury, and creating gridlock. Clearly additional housing brings additional traffic, however, all the allocated sites in Great Cornard and Sudbury have, or will have as part of the development package, good public transport links, and some sites are particularly well located for cycling and walking as alternative modes of transport. This site is close to bus routes to Bury St Edmunds, Colchester and Sudbury, and a cycle link is proposed at the northwest corner of the site.
R45	Start of Ribbon development	The proposal is clearly not symptomatic of ribbon development (ribbon development extends alongside roads / linear features etc.). Basis of this objection inexplicable
R50, R156, R157, R408, R604,	Impact on Quality of Life	Intangible claim that is subjective and not substantiated by any evidence. Also does not specify whose quality of life would be harmed (or how)
R55, R95, R143, R156, R157, R162, R165, R168, R170, R185, R187, R189, R191, R193, R199, R201, R207, R221, R220, R238, R242, R243, R255, R258, R262, R263, R267, R274, R279, R281, R283, R285, R287, R292, R297, R300, R304, R306, R307, R308, R320, R357, R360, R362, R365, R367, R372, R381, R383, R390, R397, R399, R406, R414, R416, R420, R422, R424, R425, R427, R429, R435, R437, R441, R450, R453, R460, R461, R464, R468, R470, R474, R476, R481, R483, R488, R494, R505, R527, R529, R535, R535, R537, R541, R544, R551, R561, R567, R569, R575, R576, R578, R581, R585, R589, R596, R598, R608, R614, R621, R631, R632, R633, R634, R635, R637, R650, R652, R654, R657, R659, R661, R663, R676, R680, R696, R699, R701, R704, R706, R708,R717, R722, R727, R735, R737, R739, R756, R762, R765, R770, R772, R774, R778, R784, R786, R794, R798, R800, R809, R812, R8/14, R822, R823, R830, R833, R841, R843, R844, R846, R849, R850, R852, R858, R859, R862, R880, R882, R884, R886, R895, R897, R903, R906, R910, R933, R940, R942, R949, R951, R968, R1028, R1035, R1048, R1051, R1053, R1208, R1210, R941, R909	Sewage infrastructure is inadequate	Available evidence does not support this claim. Anglian Water consulted - no objection in principle. Some technical improvement measures necessary
R57, R66, R69, R92, R128, R217, R253, R260, R461, R531, R565, R571, R617, R621, R727, R745, R751, R756, R879, R891, R1044, R1063,	Other more suitable/sustainable sites	Only 2 other omission sites were submitted for consideration at the Local Plan Inquiry, and of these one (Cornard Mills) had secured planning permission by the time the Inquiry came to consider alternative proposals, and the other was an 'extension' to the Shawlands Avenue site which the Inspector has recommended should be not be included.

R44, R50, R104, R266, R267 R27, R429, R474, R541, R621, R637, R841, R1051,	Poor drainage on site/Surface water drainage/Effect on water table	Such matters would be dealt with as part of the planning application process. There is sufficient land within the allocation to provide for surface water drainage. (For example, it is anticipated that SuDS may be appropriate)
R78, R81, R183, R348, R349, R605, R617, R637, R640, R826, R879,	No development to be put on this site/Site unsuitable for this development	This is a statement/an opinion that is not supported by evidence, and is not an objection.
R185, R187, R189, R191, R193, R201, R209, R210, R221, R239, R262, R263, R279, R295, R306, R308, R381, R383, R406, R422, R424, R435, R437, R441, R453, R470, R481, R490, R493, R494, R505, R537, R555, R561, R569, R578, R589, R621, R631, R632, R633, R634, R635, R637, R657, R674, R676, R696, R699, R701, R713, R722, R735, R756, R758, R770, R772, R778, R791, R812, R814, R819, R822, R833, R841, R843, R844, R846, R849, R850, R852, R882, R886, R949, R951, R957, R959, R961, R1028, R1048, R1051, R1214,	No proper examination of alternative sites	The Local Plan process examines and considers sites for development - the Local Plan Inquiry is the culmination of this, and allows for the consideration in public of "omission sites", that is sites that have not been put forward by the Council. The examination of sites for development is exhaustive and inclusive, and there is no substance to this objection.
R82	No space between existing developments & proposed.	The proposed development is an extension of the existing settlement. Open space is provided on the edge of the development on the higher ground, and will be linked via the existing footpath network to the existing developed area.
R193, R207, R209, R210, R252, R262, R263, R279, R381, R383, R424, R435, R437, R453, R470, R494, R544, R555, R561, R578, R594, R608, R612, R614, R621, R631, R632, R633, R634, R635, R637, R646, R657, R676, R696, R699, R701, R722, R735, R737, R739, R770, R772, R778, R789, R841, R843, R844, R846, R849, R882, R906, R1024, R1048, R1051, R1053, R909	SLA boundary does not follow accepted physical features	The proposed boundary for the SLA is perfectly logical following a topographical feature (the ridgeline) and the edge of the newly developed area. It makes sense to include the woodland and public open space within the SLA and exclude the housing area on the lower slope below the ridgeline.
R249, R295, R364	Not a logical extension of Great Cornard	Issue considered through Inquiry evidence and reviewed carefully by Inspector. Existing pattern of development, landform and existing urban edge all indicate that proposal is a logical extension
R348, R349	Area should be designated Public Open Space	This idea not deliverable
R295, R1053,	Contravenes County Structure Plan Policies (ENV8, CS1, ENV4, ENV16)	Structure Plan policy considerations considered by Inspector, who had before him and took into account the Development Plan for the Babergh area. No material conflict demonstrated by this claim. Policy ENV8 not applicable, as SLA not designated

R295, R637, R894,	Shawlands Avenue sufficient to address housing needs of Gt Cornard	The Inspector has recommended deletion of the Shawlands Avenue allocation.
R1053	Figures for housing allocations are flawed.	Site allocated upon basis of all material factors, including availability of sites, conformity with relevant policy and on its own merits. Brownfield development rates (completions) reflect previous planning permissions and not current site availability. Council to use plan, monitor and manage, approach in any case
R295, R362, R466, R550, R787, R974, R975, R1024, R1053,	Impact on Archaeological site	Scheduled areas not within developable area.
R295	Inspector failed to consider all material planning considerations	The Inspector considers the material planning considerations for this site in paragraphs 3.96.12.3 through to 3.96.12.10. The objector refers to the Inspector's reasoning for recommending deletion of the Shawlands Avenue site and concludes "it is curious that the Inspector did not consider the above reasons for rejecting the omission site." The reasons quoted refer to highway matters (including expense and visual intrusion), biodiversity and effect on the landscape, all of which matters are considered by the Inspector on the Carsons Drive site.
R370, R372, R381, R383, R390, R397, R399, R406, R419, R420, R425, R431, R434, R435, R437, R440, R441, R447, R450, R453, R470, R481, R483, R488, R494, R501, R544, R555, R569, R578, R590, R608, R631, R632, R633, R634, R635, R637, R657, R659, R661, R663, R676, R686, R696, R699, R701, R713, R714, R722, R727, R735, R737, R739, R748, R756, R758, R760, R770, R774, R778, R791, R793, R798, R810, R812, R814, R819, R839, R841, R843, R844, R846, R849, R850, R852, R873, R876, R882, R886, R889, R940, R942, R951, R1037, R1048, R1051, R1053, R941	Road improvements will be costly and lead to unacceptable urbanisation of the C732	These objectors assume that the C732 would be widened through its length. This is not being advocated, and is not a requirement of the policy. The Council is working with the Highway Authority to consider alternative solutions to the problem of the use of this road as a 'rat-run' to and from the A134.
R530, R856, R946,	Site too large	The objectors refer to 10 acres being too large a site, but do not give specific reasons for this view. The Inspector commented that the larger size of the Carsons Drive site would provide greater flexibility in housing provision to help meet the need for additional housing in the district.
R530	Site is adjacent to Dedham Vale AONB	Not the case. This AONB is situated some miles away

R1024	Inspector has assumed wrongly that Shawlands Avenue has sewage problems.	This point is not mentioned by the Inspector in his Reasoning and Conclusions. His reasons for recommending the deletion of the Shawlands Avenue site are set out in paragraphs 3.85.1 to 3.85.5, and he concludes that the site is not a sustainable one.
R1024,	Existing access should be used not new one onto the C732	A development of this size requires a new access onto the C732, as the existing roads adjoining the site are 'estate roads' and are not of high enough standard (width, alignment, visibility at junctions etc) to provide access for additional traffic.
R952	Parish Council strongly oppose the plan	The Parish Council's concerns have been noted, and addressed.
R1209 (SCC Highways)	The proposed modification does not give sufficient details on highways improvements necessary: Carsons Drive & C732 need improvement and pavements; C732 needs to be a min. 5.5m wide; C732 & A134 junction needs improvements. This work is likely to be excessive	Some aspects agreed (including need for some improvements), although both the developer of the site and the Inspector have cited a range of measures and the policy already requires 'highways improvements including provision of a footpath.' Although the measures suggested in this representation (such as widening C732 throughout its length) are not agreed as appropriate, this does not mean that other more sustainable measures cannot be identified. Indeed, more sustainable measures should be identified to address any demonstrable improvements required. These are to be assessed and controlled at the planning application stage, as is common practice.
R858	Local Transport Action Plan not in place within the village or surrounding areas.	This should not prevent the allocation of land for housing. Once the allocation is made, development will come forward over time not all at one time, and the Local Transport Action Plan can take the allocation and any consequential transport issues into account.
R295	Adverse impact - visual amenities of area, especially from Abbas Hall and nearby development	Not clear whether / how this differs from the visual / landscape impact concerns but suggests harm to views from these locations. In planning terms, there is not a right to a view for these occupiers, raising doubts over this objection / concern. However, proposal designed especially in any case to avoid such impacts to the area

R295	Proposal not sustainable and conflicts with sustainability appraisal	Clearly an unsubstantiated assertion. Site located at one of the district's most sustainable urban locations. If development is claimed to be unsustainable here, this logic would serve to rule out virtually any location in Babergh. The SA carried out provides only a rough guide and does not serve to rule the location / proposal out. Further information also gathered since then to address some of the concerns arising within this site's SA anyway
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**Mod No 3/59 Carsons Drive Great Cornard**

<b>Supports</b>		
Rep Nos	Issues	Response
R1098 (Persimmon)	Support Modification. Supporting details in providing respect of woodland planting, public open space, SLA, archaeological investigation, highway improvements and sewage treatment together with a plan of the proposed scheme and historic landscape context & Thomas Gainsborough's paintings . (See representation for full details.)	Noted

**PIM 3/60 Hadleigh Housing Omission Site Proposals**

<b>Objections</b>		
Rep Nos	Issues	Response
R148, R150	Extension of the BUAB	The District Council accepts the Inspector's reasoning and conclusion in paragraph 3.96.14.1 to include this area of land within the Built-Up Area Boundary. Matters such as access and drainage will be dealt with at the planning application stage.
R1072, R1192	Many natural springs in this area will cause flooding	Matters of surface water drainage and flooding would be considered at the planning application stage
R1072, R1192	Disastrous effect on wildlife	The area is not a protected wildlife habitat. Any specific threats to wildlife habitats would be considered at the planning application stage.

### PIM 3/61 Policy HS11 Housing density

<b>Objections</b>		
Rep Nos	Issues	Response
R1076	Proposed modification Policy HS11 is contrary to PPG3. GoEast recognise that in certain circumstances and in certain rural areas there may be exceptional reasons why there needs to be a local variation to the national policy, and suggest re-wording Policy HS11.	Modification made in line with Inspector's recommendation. However, clarification of the policy's exceptions would be useful. Therefore, add new supporting text as new para. 3.62a to follow the policy: <b>'In applying Policy HS11 and considering any exceptions to it, the following circumstances will be considered as material: (a) situations where a development solution with a density of 30 dwellings per hectare (or higher) cannot be achieved, in terms of the impact of the scheme on the character and appearance of the locality; (b) the need to demonstrate that the lower density sought makes the most efficient use of land, whilst taking into account the character and appearance of the local area; and (c) the need to demonstrate that higher density schemes would lead to unacceptable outcomes (such as increasing the need to travel) in terms of the incremental expansion of villages with few or no local facilities (including passenger transport services) and where there is little or no likelihood of such facilities being provided.'</b>

### PIM 3/67 Policy HS15 Public Open Space & Play Areas on New Development

<b>Supports</b>		
Rep Nos	Issues	Response
R1133	Support proposed modification	Noted.

### PIM 3/68 Policy HS16 Public Open Space & Play Areas On New Development

<b>Supports</b>		
Rep Nos	Issues	Response
R1134	Support proposed modification	Noted.

### PIM 3/69 Policy HS17 Extensions to Existing Dwellings

<b>Supports</b>		
Rep Nos	Issues	Response
R1135	Support proposed modification	Noted.

### PIM 3/70 para 3.38 Smaller Dwellings

<b>Objections</b>		
Rep Nos	Issues	Response
R1187	20% figure has not been deleted	The 20% figure has been deleted from Policy HS18 (see PIM 3/71) but retained in the supporting paragraph 3.83 as recommended by the Inspector. Note: It was intended to use the Inspector's recommended wording for the final sentence of this paragraph, and the word "seek" should be deleted from PIM 3/70. The final sentence should read "Subsequent surveys will determine whether this figure should change over the plan period."
R1187	Any housing mix would need to be justified by Housing Market Assessments not housing needs surveys, to consider the whole market	It is understood that Housing Market Assessments will be required by PPS3 when published later this year. The requirement will a) post-date the Local Plan Inquiry, and b) be national planning policy, as such there is no need to repeat it in Development Plan Documents.
R1181	Reinstate original Policy HS18 wording (stating minimum of 20% small dwellings required in all cases).	Change made in response to Inspector's recommendation. Each development to be considered on its own merits and the housing need that prevails in the area of the development at the time. The size of dwellings secured is extremely important but it might be the case that less than 20% small dwellings provision is appropriate, or possibly much more than 20%. The level of provision in any case should reflect the level of need.

**PIM 3/70 para 3.83 Smaller Dwellings**

<b>Supports</b>		
Rep Nos	Issues	Response
R1137	Support proposed modification	Noted.

**PIM 3/71 Policy HS18 Smaller Dwellings**

<b>Objections</b>		
Rep Nos	Issues	Response
R1182	Reinstate original Policy HS18 wording (stating minimum of 20% small dwellings required in all cases).	Duplicates R1181 (PIM 3/70) objection therefore unnecessary. See reponse to R1181. No change.
<b>Supports</b>		
Rep Nos	Issues	Response
R1136	Support proposed modification	Noted.

## Chapter 4 - Economy and Employment

### PIM 4/3 para 4.17a The Former 'IFF Site' near Long Melford

<b>Objections</b>		
Rep Nos	Issues	Response
R1021, R1022 R1023	The revised wording fails to address access problems	The revised para 4.17a states that a development brief would be produced following a feasibility study. Any issues relating to access would be addressed by both the study and development brief during the application process..
R1021, R1022, R1023	Objects to deletion of requirement for a Flood Risk Assessment	There is no need for this to be specifically referred to as (in line with PPG25) a Flood Risk Assessment would be required to be submitted with any planning application on this site.

### PIM 4/3 para 4.17a The Former 'IFF Site' near Long Melford

<b>Supports</b>		
Rep Nos	Issues	Response
R36	Supports amended wording to include communication with Braintree DC	Noted

### PIM 4/4 Policy EM02a Former IFF site near Long Melford

<b>Supports</b>		
Rep Nos	Issues	Response
R37	Support deletion of policy EM02a	Noted

## PIM 4/5 Policy EM02b Employment allocation at Grays Close Hadleigh

<b>Objections</b>		
Rep Nos	Issues	Response
R1195	Sewerage facilities insufficient	Any additions to these facilities would be addressed at the planning application stage.
R1195	Impact on biodiversity and protection of trees on the site	The Policy now includes a new green/amenity and wildlife corridor on the eastern edge and an area of public open space. There is an opportunity for TPOs to be put in place at the planning application stage if necessary.
R1202	Impact on existing footpath network and diversion of that running through Durrants Farm garden	The network of footpaths and cycleways described will be within the site, linking to the roads specified. The details of routes would be addressed at the planning application stage. Any diversion of footpaths would need to be the subject of a separate process.
R1197	Impact on traffic, countryside and the need for additional land for housing and industrial use open to question.	The Inspector points out that Hadleigh is the second largest town in Babergh district, and he concluded that this site is "the only large area of land which is well located for a mixed use development". The Inspector recognised the need to allocate land for housing in Hadleigh, and the need identified by the Employment Land Study, for more land to be allocated for employment growth. The town is tightly constrained, and development of the site would require investment in new infrastructure and the Inspector identified the need to satisfy the required level of growth in an efficient and sustainable way.
<b>Supports</b>		
Rep Nos	Issues	Response
R1070	Support for PIM 4/5 Employment land allocation at land off Grays Close, Hadleigh	Noted.

**PIM 4/8 Policy EM02d Wherstead Office Park (Former Powergen/E.on/TXU)**

<b>Objections</b>		
Rep Nos	Issues	Response
R1062	Objection to amended wording of 5th bullet point, and suggests inclusion of the words "adopted highway" in front of "access"	It is not possible to use policy criteria to require a highway to be adopted, but an amendment to the wording is being suggested (following consultation with the Highway Authority) to require the new access to be designed and constructed to adoptable standards.

**PIM 4/9 Policy EM02e Brantham Industrial Area**

<b>Supports</b>		
Rep Nos	Issues	Response
R1211	Support the proposed modification.	Noted

### PIM 4/17 Policy EM14 Workshop scale sites

<b>Objections</b>		
Rep Nos	Issues	Response
R173	<p>This is a vague statement inconsistent with the rest of the Local Plan and it does not give interested parties any positive indication about the areas development.</p> <p>Furthermore it does not spell out what a special policy area is and what action it implies.</p>	<p>Although Brantham Parish Council have objected to PIM 4/17 - Policy EM14, specifically the deletion of Cattawade from the list of sites identified for workshop-scale employment, the substance of the objection refers to PIM 4/9 Policy EM02e. The proposed wording recommended by the Inspector puts the focus for any development firmly at the forefront of the policy. The proposed policy wording requires a feasibility study and development brief to be prepared to inform consideration of comprehensive redevelopment proposals. The eight criteria listed give clear guidance for any prospective developer of the site. The smaller area of land previously allocated for workshop-scale employment is proposed to be included in the larger site and would be subject to Policy EM02e as set out in PIM 4/9. It would be unrealistic to impose a timetable on the implementation of this policy. This is a large site with several occupiers and two major owners. Any redevelopment proposals will involve a number of interested parties and agencies, and consultation with the community/local people at appropriate stages. Prospective developers will be expected to work with the District Council, other agencies and the community, but ultimately, whether development proposals come forward within the plan period will depend upon the owners of the site.</p>

### PIM 4/18 para 4.46 Retention of Employment Sites

<b>Supports</b>		
Rep Nos	Issues	Response
R1138	Support proposed modification	Noted.

### PIM 4/19 Policy EM15 Retention of Employment Sites

<b>Supports</b>		
Rep Nos	Issues	Response
R1139	Support proposed modification	Noted.

### PIM 4/22 Inset 14 Ipswich Fringe

<b>Objections</b>		
Rep Nos	Issues	Response
R1083	Inset 14 should show the BUAB (of the Ipswich Fringe within Babergh District) extended to include the British Sugar site	Objector incorrectly interprets the Inspector's recommendation in paragraph 4.13.18 of his Report as referring to the BUAB when he refers to including land to the west within "the area allocated for employment". At no point at the Inquiry or in the Inspector's Report was it suggested that the built-up area of Ipswich should be extended to include the British Sugar site at Sproughton. The Inspector refers to the areas adjacent to the site in paragraph 4.13.4, and notes that "the housing to the south is separated from this site by the valley and the river and is at a lower level." He states "To my mind the BSC site is part of an industrial enclave clearly defined by the river and a difference in levels to the south."
<b>Supports</b>		
Rep Nos	Issues	Response
R1140	Support proposed modification	Noted.

**PIM 4/25 Inset 17 Notley Enterprise Park & 4/26 Proposals Map**

<b>Objections</b>		
Rep Nos	Issues	Response
R75, R76,	Maps not included within Post Inquiry Modifications.	The District Council acknowledge this error in not including Inset 17 in Schedule D of Proposed Modifications, and an Addendum has been published and circulated to rectify this omission. The Proposals Map will also be amended to show Inset 17.
R1085	Object to removal of landscaping requirement	Agree with the Inspector's view that the boundary landscaping strips shown on Inset 17 are not practical. Also it may be taken to mean that a strip of planting is all that is required. There is no change proposed to the wording of Policy EM07 from the Pre-Inquiry Change 79 which makes it clear that development proposals will be judged on the impact they would make in the landscape and that improved perimeter landscaping is required. This wording is clear but flexible and will enable the Council to negotiate the most suitable and appropriate landscaping at application stage.

## Chapter 6 - Countryside and the Rural Economy

### PIM 6/5 Policy CR05 Special Landscape Areas

Objections		
Rep Nos	Issues	Response
<p>R20, R22, R23, R24, R25, R28, R43, R46, R49, R51, R56, R60, R62, R71, R72, R79, R80, R83, R86, R87, R90, R102, R103, R110, R111, R112, R113, R118, R122, R123, R125, R127, R133, R135, R138, R140, R154, R155, R158, R159, R161, R163, R166, R169, R186, R188, R190, R192, R194, R197, R200, R202, R203, R205, R211, R212, R215, R216, R218, R223, R224, R225, R226, R240, R244, R245, R247, R250, R251, R254, R256, R257, R259, R261, R264, R265, R268, R271, R272, R275, R276, R277, R280, R282, R284, R286, R288, R290, R293, R296, R298, R299, R302, R303, R305, R309, R311, R313, R316, R318, R319, R322, R347, R351, R354, R356, R358, R334, R361, R363, R366, R368, R371, R374, R376, R377, R380, R382, R384, R386, R387, R391, R394, R396, R398, R400, R402, R404, R405, R407, R409, R411, R413, R415, R417, R418, R421, R423, R426, R438, R432, R433, R436, R439, R442, R443, R449, R451, R452, R456, R458, R459, R463, R465, R467, R469, R473, R477, R479, R482, R484, R485, R487, R489, R491, R492, R495, R496, R502, R503, R508, R509, R512, R517, R519, R520, R523, R526, R528, R533, R536, R538, R539, R542,</p> <p>R545, R547, R548, R549, R552, R554, R556, R557, R559, R562, R568, R570, R572, R573, R574, R577, R580, R582, R583, R586, R588, R593, R595, R597, R599, R600, R603, R628, R629, R630, R636, R639, R641, R607, R609, R611, R613, R615, R616, R618, R620, R623, R624, R625, R645, R647, R649, R651, R653, R655, R658, R660, R662, R664, R665, R666, R667, R669, R671, R673, R675, R677, R678, R681, R683, R685, R687, R688, R690, R691, R693, R694, R697, R698, R700, R703, R705, R707, R709, R712, R715, R716, R718, R721, R723, R725, R726, R728, R730, R733, R736, R738, R740, R741, R743, R747, R750, R752, R757, R759, R761, R763, R764, R766, R767, R769, R771, R773, R775, R776, R779, R780, R781, R785, R790, R792, R795, R796, R797, R802, R804, R806, R808, R811, R813, R815, R816, R817, R820, R821, R824, R828, R829, R832, R834, R840, R845, R847, R848, R851, R853, R854, R855, R857, R860, R861, R864, R866, R868, R872, R875, R877, R881, R883, R885, R888, R890, R892, R893, R896, R898, R900, R902, R904, R907, R908, R912, R914, R916, R917, R920, R922, R924, R926, R928, R930, R934, R935, R938, R940, R943, R944, R947, R948, R950, R958, R960, R962, R963, R965, R966, R969, R970, R973, R976, R977, R1027, R1060, R206, R61, R69, R94, R428, R506, R1029, R1030, R1032, R1034, R1036, R1038, R1039, R1046, R1047, R1049, R1050, R1052, R1054, R1064</p>	<p>Object to loss of wording referring to "strict control of development". Original wording accords with the protection afforded as laid out in PPG7 &amp; ENV4</p>	<p>The District Council accepts the Inspector's view that it is necessary to distinguish between national designations (such as AONB) and local designations such as Special Landscape Areas. The proposed modification for Policy CR05 is in line with Government advice in PPS7 (paragraphs 24 and 25). The proposed housing allocation at Carsons Drive is a greenfield allocation. Once developed the Built-Up Area Boundary will be adjusted to accommodate the new residential area. Suffolk SP Policy ENV4 is not intended to apply to greenfield housing allocations.</p>

R22, R23, R24, R25, R62, R71, R72, R86, R103, R110, R113, R118, R122, R125, R140, R154, R155, R198, R211, R212, R223, R225, R226, R265, R363, R387, R443, R456, R473, R479, R485, R487, R508, R509, R512, R517, R519, R520, R523, R547, R557, R559, R583, R600, R603, R618, R623, R678, R703, R721, R725, R728, R730, R848, R914, R916, R938, R963, R970, R973, R965, R1030, R1039, R1047, R1052, R1064, R1039	Distinction needed between levels of protection	The revised wording for Policy CR05 suggested by the Inspector strengthens the differentiation between the levels of protection afforded to SLAs and that afforded to AONBs in line with guidance in PPS7.
R1052	Proposed wording would open up SLAs in Babergh for development, and make control of development impossible	The revised wording for Policy CR05 recommended by the Inspector strengthens the differentiation between the levels of protection afforded to SLAs and that afforded to AONBs in line with national planning policy guidance in PPS7 and therefore provides the level of protection that is appropriate for locally designated landscape areas. New wording also requires proposals to maintain or enhance the special landscape qualities.
R1052	Proposed wording out of conformity with the Suffolk Structure Plan. Wording should follow SCC Policy ENV8	Structure Plan (2001) wording superseded by PPS7 issued in 2004. More recent policy carries more weight. Objection has no regard to these factors

### **PIM 6/5 Policy CR05 Special Landscape Area (not Carsons Drive)**

<b>Objections</b>		
Rep Nos	Issues	Response
R1105	The proposed wording would result in more development	The District Council accepts the Inspector's view that it is necessary to distinguish between national designations (such as AONB) and local designations such as Special Landscape Areas. The proposed modification for Policy CR05 is in line with Government advice in PPS7 (paragraphs 24 and 25).
R1107	Sudbury Common Lands: Historical and environmental significance needs to be protected	See response to R1105 above.
R1107	Sudbury Common Lands: local amenity needs to be protected	See response to R1105 above.

**PIM 6/6 Policy CR06 Special Landscape Areas**

<b>Objections</b>		
Rep Nos	Issues	Response
R1169	The word 'permitted' should not be used as applications are made under the Electricity Act	This issue was covered in detail in the Council's rebuttal at the Inquiry. If works are approved under the Electricity Act the works have deemed planning permission, but the Council can object to this. Grounds of any objection would need to be justified. Policies and paragraphs within the local plan would carry weight, reinforcing any objection.

**PIM 6/13 Policy CR22 Change of use from agricultural land to domestic gardens**

<b>Supports</b>		
Rep Nos	Issues	Response
R1160	The RSPB supports the addition 'biodiversity', so that proposals will not be permitted where they are shown to have an adverse impact on the biodiversity of the locality. The proposed modification constitutes a more robust policy.	Noted

## Chapter 7 - Countryside and the Rural Economy

### PIM 7/17 Policy CN21 Street Furniture & Overhead Wires

<b>Supports</b>		
Rep Nos	Issues	Response
R1166	Supports the alteration in the wording	Noted

### PIM 7/18 para 7.39 Street Furniture & Overhead Wires

<b>Objections</b>		
Rep Nos	Issues	Response
R1168	Objects to the placing of the wording of former CN22 into para 7.39	The Inspector has already considered the issues raised and has deemed it necessary to move the wording to the para as it is a statement of intent. There is no need to alter the wording as it states "when resources permit". Should resources not permit there is no requirement to undertake work. Overhead wires refer to all wires and not just those of the National Grid. In any event specification of overhead wires as being low voltage is unnecessary as there are no high voltage electricity overhead wires in conservation areas.

### PIM 7/19 Policy CN22 Street Furniture & Overhead Wires

<b>Supports</b>		
Rep Nos	Issues	Response
R1167	Supports the deletion of the policy	Noted.

## Chapter 8 - Recreation and Tourism

### PIM No 8/1 para 8.14 Playing Fields

Objections		
Rep Nos	Issues	Response
R171	<p>Proposed modification in some parts is either inaccurate or out of date.</p> <p>1. 1998 Playing Field Direction does not itself require local planning authorities to consult Sport England on planning applications affecting playing fields. It is General Permitted Development Procedure Order 1995 (as amended) that requires Sport England to be consulted as a statutory consultee on planning applications that affect playing fields.</p> <p>The Playing Fields Direction was introduced later in 1998 to provide an additional safeguard for protection of playing fields by requiring local planning authorities to notify the Secretary of State in circumstances where they are minded to allow development affecting playing fields, but where Sport England</p>	<p>These are technical updates/corrections which can be made at this stage. The following amended wording is suggested: -</p> <p><b>The District Council will encourage the County Council to allow increased public use of school playing fields. PPG17 strongly resists the loss of such facilities where they are in active use and paragraph 15 of the PPG sets out a series of tests that should be met in order to allow the development of playing fields. Furthermore Sport England are a statutory consultee on proposals that affect playing fields, and the 1998 Playing Fields Direction requires local planning authorities to notify the Secretary of State in circumstances where they are minded to allow development affecting playing fields, but where Sport England has objected. Sport England's Planning for Sport and Active Recreation: Objectives &amp; Opportunities (Interim Statement 2005) sets out the circumstances where there may not be a reason to object to such an application.</b></p>

	<p>has objected. 2. Sport England's Planning Policy Statement (1990) has recently been superceded by its new Planning for Sport and Active Recreation: Objectives &amp; Opportunities (Interim Statement 2005).</p>	
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**PIM 8/2 Policy RE03 Playing Fields**

<b>Objections</b>		
Rep Nos	Issues	Response
R1078	GoEast question the need for a policy as the issue is adequately covered in PPG17. Policy RE03 does not fully reflect the provisions of the national policy. The Council should consider deleting the policy, or amending it to properly reflect the spirit of the national guidance in PPG17 particularly the tests in paragraph 15.	It is proposed to add the following note to the policy to bring it up to date with PPG17: - <b>Note: the above policy should be read in conjunction with, and is in addition to, the criteria set out in paragraph 15 of PPG17: Planning for Open Space, Sport and Recreation (July 2002)</b>

## Chapter 9 -Transport

### PIM 9/12 para 9.40 Transport in Great Cornard & Sudbury

<b>Supports</b>		
Rep Nos	Issues	Response
R38	Amended wording Para 9.40	Noted

### PIM 9/13 para 9.41 Transport in Great Cornard & Sudbury

<b>Supports</b>		
Rep Nos	Issues	Response
R39	Deletion of para 9.41	Noted

### PIM 9/14 Policy 9.42a Transport in Great Cornard & Sudbury

<b>Objections</b>		
Rep Nos	Issues	Response
R1079	The route of the Sudbury Western Bypass has been considered by Ministers and not supported. GoEast recommend that unless the Council can demonstrate robust evidence demonstrating the likely delivery of the Sudbury Western Bypass within the plan's time period the paragraph and notation should be deleted.	The Sudbury Western Bypass is the favoured option of the Local Transport Action Plan (2003) and of the SCC Transport Action Plan 2006-11. Without the safeguarding of its route, clearly it will be far more difficult to achieve this aim over the Plan period. Other transport management measures have been promoted in the meantime and will continue to be pursued. However, it remains Babergh and SCC's hopes that further efforts to demonstrate the need for this route and to make the case for funding will be successful during the Plan period. The identified safeguarded route is not considered to be the cause of blight to the land that it crosses
<b>Supports</b>		
Rep Nos	Issues	Response
R40	Deletion of para 9.41	Noted

## Chapter 11 - Hadleigh Town

### PIM 11/2 para 11.15 Shopping

Objections		
Rep Nos	Issues	Response
R120	Objection to the paragraph as it contains reference to a criteria that can only be described as subjective and can lead to wide interpretation.	Government policy in PPGs and PPSs use the term "well designed layouts" and advises local planning authorities to "reject poor design" (PPG3), and PPS1 refers in paragraph 33 to "good design". Paragraph 35 sets out criteria for "high quality and inclusive design". PPS6 Planning for Town Centres gives further detailed guidance in the companion document, 'Guidance on Design and Implementation Tools'. There is sufficient guidance in these and Best Practice and supplementary documents for this term to be understood, and for the local planning authority to use as guidance in determining what is "well designed" in this context.
R120	The paragraph is vague and open to wide speculation. There is no note contained within policy HD01b to indicate that matters will be dealt with through a legal agreement.	The paragraph summarises the context for the policy, and it should not be prescriptive in terms of the type of compensation for the loss of small business units at the allocation stage. It would be a mistake to limit ideas for compensatory proposals. It is common practice to negotiate the terms of a S106 agreement prior to or during the course of considering an application, and it is not necessary nor is it a requirement that this should be set out in policies.
R1114	Second to last sentence referring to accommodation for small businesses and the need to compensate for their loss should be deleted.	Objector refers to the Inspector's recommendations with respect to Policy EM15. However, the Inspector had the opportunity to make reference to this when considering PIC1 and the wording in this paragraph. The Inspector recommended five changes and modifications in accordance with PIC1, paragraph 11.15f was only recommended to be modified by inserting "details of the" in front of "design" in the third sentence. The Council does not interpret the Inspector's silence to mean that this paragraph should be modified as set out by the Objector.

**PIM11/2 Hadleigh Supermarket (Deletion of Policy HD01a and insertion of new allocation - Policy HD01b)**

<b>Objections</b>		
Rep Nos	Issues	Response
R121	The reference to size should be stated as referring to the maximum gross external area.	Conventionally reference to floorspace in planning documents is assumed to be gross. Floorspace in the Retail Capacity Study carried out for the District Council is gross, as are the figures referred to in the Inspector's Report to the Secretary of State for the Environment, Transport and the Regions in 2001. Indeed, the commentary on proposed conditions should the Secretary of State have been minded to uphold the appeal, sets out a specific figure of 1300 sq m for the amount of floorspace to be used for the sale of convenience goods of which no more than 12% was to be for non-food sales. The draft condition went on to define what was meant by the sales floor area, making it clear that the 'headline' figure is gross. Further paragraph 11.12.13 of the Local Plan Inquiry Inspector's Report states "I do not consider that the figure of 2555 sq m gross should be exceeded on the Brett Works site". The District Council is satisfied that the policy is sufficiently clear on this point.
R121	The expression within the first and second bullets is too vague and subjective.	See the response above to R120 (PIM 11/2 para 11.15).

R121	Throughout the whole investigation of the potential of the Brett Works site to be served off Bridge Street, there has never been any agreement as to whether or not a "safe access" can be provided under any circumstances. The policy is therefore making assumptions on a fundamental point that may never be capable of being delivered.	The Inspector dealt with access in his report (paragraphs 11.12.15 to 11.12.25) including the two options submitted on behalf of Tesco, and the Highway Authority's preferred option. His recommendation was based on consideration of these and on a site inspection. This criterion should be read as a whole - the recommended wording summarises the main issues relating to provision of access to the site.
R121	The fourth bullet is vague and open to wide interpretation.	This criterion is clear and explicit, however it cannot be prescriptive as the measures required to mitigate any loss of residential amenity will depend entirely upon the details of layout and design, and cannot be determined in advance.
R121	Within bullet point five the wording is vague and unspecified. The whole criteria within this bullet point should be completely reworded and entirely explicit in terms of what it is seeking to control.	There is sufficient guidance in this criterion to provide a framework for negotiation of this matter in a S106 agreement or to design a suitable condition on any planning permission (see the Inspector's Report to the Secretary of State 2001 referred to above). This is a matter for the planning application stage and it is inappropriate and unnecessary to provide such detail in a policy.
R121	The sixth and seventh bullets are vague and open to wide interpretation.	These criteria provide sufficient information to guide potential applicants. The criteria listed in the policy provide a framework for considering development proposals and are not intended to be prescriptive or to be a set of rules.

R121	Notwithstanding the Inspector's recommendation on Policy EN15, the policy for the Brett Works site must include a positive requirement for any application to include replacement employment opportunities in the town.	The need to replace the low-cost workshop accommodation at Brett Works will be assessed at the time any planning application is made. It is not appropriate to limit compensatory measures to "replacement employment opportunities in the town". Clearly the supermarket will provide a range of employment opportunities. It may be that the type of workshop building required would be better located on an industrial area rather than "in the town" where few opportunities remain for such activities. The removal of the criterion from Pre-Inquiry Change No.2 (Set 1) is consistent with the Inspector's recommendation to delete the final sentence of Policy EM15. Retaining the requirement for funding to promote employment opportunities for the Hadleigh area would be contrary to the Inspector's reasoning (paragraph 4.46.1) for recommending deletion of the final sentence of Policy EM15 and would be unreasonable.
R979, R1118	Would like to see early assessment of the design, flooding and archaeological constraints, and need for this acknowledged in the accompanying text to the policy.	Need for a Flood Risk Assessment is a requirement of the policy and indeed a FRA has already been carried out anyway (August 2002). Archaeology implications will be assessed at the planning application stage. The District Council would expect the developer to be involved in pre-application discussions particularly in regard to the design considerations of any proposed scheme. The issue of design is raised in the supporting text, paragraph 11.15f
R1109, R1118	Development of this site would lead to traffic and litter nuisance	Any new retail development in or on the edge of the town centre would result in additional traffic movements. There is other legislation to address problems of litter. These issues are not specific to this site.
R1104, R1117, R1207	Delete reference to (possible use of) CPO powers - Hadleigh supermarket. Such reference is not necessary and coercive, instead of informative	Change recommended by Inspector and objectors have not demonstrated cogent reasons on which to reject this recommendation. Reference neither authorises use of these powers, nor would its deletion preclude them. It is there for openness and certainty (as far as possible). Reference included to reflect known circumstances around land ownership for this proposal. Objection made to land / site not in the ownership or control of the objectors.
R1110, R1111	Supermarket would be harmful to town: traffic	Issue already considered by the Inspector - no new evidence.

R1110	Supermarket would be harmful to town: noise	Issue already considered - no new evidence.
R1110, R1111	Supermarket would be harmful to town: harm to trade / shops	Issue already considered - no new evidence.
R1111	Supermarket would be harmful to town: loss of employment levels	No evidence to prove that a loss of employment (numbers) will result. Indeed, the converse may be true, as supermarkets are significant employers, they can be regarded as an employment use, and they source products from a very wide area (often including the locality)
R1112	Change Hadleigh BUAB to include objector's land to east of new access road	No Inspector's recommendation to change BUAB in this location and this is not necessary or desirable. Inspector would have recommended this if he thought it appropriate and thus the objector is merely having yet another attempt to pursue his objections. No cogent case demonstrated to disagree with Inspector's recommendation. Objection cites a tenuous and inexplicable link to the officers' report to Committee E218 and it is not necessary to make this change to show that the Inspector's report is to be welcomed. Objector's case already considered by Inspector and not supported by him in respect of this issue - 'its future will need to be determined by the Council on its own merit'. Changing the BUAB would predetermine this land's future by creating a policy backdrop allowing for its future development - hence this objection.
R1116	No justification for new store in light of the Co op extension having been carried out	The Retail Study took the planned Co-op extension into account and concluded that food shopping floorspace is required in Hadleigh IN ADDITION to the (then) planned extension to the Co-op.
R1115	Criterion 10 - seeks rewording in relation to management of the car park	This criterion is part of the Pre-Inquiry Change and has not been the subject of an objection considered at the Inquiry. The Inspector has not recommended a change to this criterion, and the Council is satisfied that it conveys accurately the aspiration for this car park. The criteria starts with "Agreement", so clearly an element of negotiation is inevitable.
<b>Supports</b>		
Rep Nos	Issues	Response
R3, R10, R11, R12, R176, R177	Most suitable site	Noted

R3, R10, R11, R12	Bridge Street vehicular access acceptable	Noted
R11	Church Lane & Pound Lane pedestrian access acceptable	Noted
R12	In accordance with Government directives	Noted
R1113	Broadly support allocation under Policy HD01b	Noted

## Chapter 12 - Chilton Mixed Use Development

### PIM 12/5 para 12.23 (existing) Community Retail Facilities

<b>Supports</b>		
Rep Nos	Issues	Response
R1141	Support proposed modification	Noted.

### PIM 12/8 para 12.24a Retail Expansion

<b>Objections</b>		
Rep Nos	Issues	Response
R1074	Not evident that the PPS6 tests have been applied prior to the site being allocated for this purpose. GoEast recommend this is deleted from the policy unless the Council can demonstrate robust evidence that the PPS6 tests have been followed.	The PPS6 tests have been followed. (a) & (b) addressed / demonstrated by the Council's Retail Capacity Study 2002. (c) evidenced by Donaldsons study August 2003; Rapleys / Kel Kel study March 1999; Cushman & Wakefield (et al) study July 2005 (d) Rapleys / Kel Kel study March 1999 (but newer proposal- specific research appropriate) (e) Chilton development to benefit from comprehensive, planned approach towards sustainable transport options (Masterplan 2004). Conclusion: evidence base largely in place but some newer evidence also appropriate and to be required when site development proposals come forward. no change needed
<b>Supports</b>		
Rep Nos	Issues	Response
R1142	Support proposed modification	Noted.

### PIM 12/9 para 12.26 Community Woodland

<b>Supports</b>		
Rep Nos	Issues	Response
R1143	Support proposed modification	Noted.

**PIM 12/10 para 12.27 Community Woodland**

<b>Supports</b>		
Rep Nos	Issues	Response
R1144	Support proposed modification	Noted.

**PIM12/11 Policy CP01 Chilton Mixed Use Development Package**

<b>Supports</b>		
Rep Nos	Issues	Response
R1145	Support proposed modification	Noted.

**PIM 12/12 Policy CP01a)**

<b>Supports</b>		
Rep Nos	Issues	Response
R1146	Support proposed modification	Noted.

**PIM 12/13 Policy CP01b)**

<b>Supports</b>		
Rep Nos	Issues	Response
R1147, R1162, R1163	Support the modification to CP01b to resite the waste station away from the Chilton Grain end of the proposed development.	Noted

**PIM 12/14 Policy CP01c)**

<b>Supports</b>		
Rep Nos	Issues	Response
R1148	Support proposed modification	Noted.

**PIM 12/15 Policy CP01d)**

<b>Supports</b>		
Rep Nos	Issues	Response
R1149	Support proposed modification	Noted.

**PIM 12/16 Policy CP01d)a) and paras 12.24 & 12.25**

<b>Objections</b>		
Rep Nos	Issues	Response
R1080	GoEast are concerned that the plan seeks to allocate an out of centre retail expansion site without firstly establishing the need for the extra retail capacity or consideration of its impact on existing centres. It doesn't appear that the sequential test set out in PPS6 has been considered. Unless the Council can demonstrate robust evidence that the site passes the PPS6 tests the retail expansion site should be deleted and instead the policy should be clear that the acceptability of future proposals for retail expansion will be considered in the the light of performance against the policy tests in PPS6.	Need to satisfy tests of PPS6 accepted. Circumstances have moved on since this PIM as the Council has accepted the case for retail expansion at this superstore location (Committee resolution to grant planning permission reached). Case for expansion evidence by Cushman & Wakefield, Healey & Baker study (and associated research) July 2005. In addition, any town centre impact to be mitigated by Section 106 agreement. Developer has agreed to enter an agreement in principle; details to resolve.

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**PIM 12/16 Policy CP01d)a) and paras 12.24 & 12.25**

<b>Supports</b>		
Rep Nos	Issues	Response
R1150	Support proposed modification	Noted.

**PIM 12/17 Policy CP01e)**

<b>Supports</b>		
Rep Nos	Issues	Response
R1151	Support proposed modification	Noted.

**PIM 12/18 Policy CP01f)ii**

<b>Supports</b>		
Rep Nos	Issues	Response
R1152	Support proposed modification	Noted.

**PIM 12/19 Policy CP01f)ii neighbourhood centre**

<b>Objections</b>		
Rep Nos	Issues	Response
R1077	GoEast concerned that the plan apparently seeks to allocate an out of centre retail site without firstly establishing the need for the extra retail capacity or consideration of its impact or its performance in a sequential test. Recommends deletion of the retail site allocation unless the Council can demonstrate robust evidence that the allocation meets the tests set out in PPS6.	Concerns re PPS6 noted and understood. However, this proposal is specifically for a (local) neighbourhood centre, rather than significant new out of centre retailing. It will provide the heart and local focus for the Chilton development. The form and scale of retail development will be appropriate to what is needed to provide for the locality, rather than any significant new provision, such as a superstore. Brief supporting text note to clarify this to be added: <b>'In considering proposals for development for the centre all provisions of PPS6 will be applied.'</b>
<b>Supports</b>		
Rep Nos	Issues	Response
R1153	Support proposed modification	Noted.

**PIM 12/20 Policy CP01f)iii**

<b>Supports</b>		
Rep Nos	Issues	Response
R1154	Support proposed modification	Noted.

**PIM 12/21 Policy CP01 Chilton Development**

<b>Objections</b>		
Rep Nos	Issues	Response
R1099, R1100, R1101, R1102	Objection to the Council's use of CPO powers	This wording was included to be consistent with other references in the Plan, (see PIM 11/2) and the provisions of the Planning and Compulsory Purchase Act 2004.
R1100, R1101	Proposal of CPO powers was not included at Inquiry and is a breach of Article 6 of European convention on Human Rights	As part of the Post Inquiry Modification process the Council is entitled to make additions/amendments to the Plan to be consistent and to bring the Plan up to date with new legislation. See responses above and below.
R1103	Delete reference in policy to possible use of CPO powers by the Council	This request is pointless. The reference does not specifically authorise the use of CPO powers. Nor would its deletion preclude their use. It is there as factual information and because such action is possible, it should remain in place as a basis for openness and certainty, as far as that is possible. If, as the Objector states, there is no need to include this reference then this is clearly at odds with lodging a strongly worded, vociferous objection to its inclusion. The Council is permitted to make such changes in light of changes in circumstances (of which the objector is perhaps oblivious) rather than being bound only by those changes recommended by the Inspector.
<b>Supports</b>		
Rep Nos	Issues	Response
R1155	Support proposed modification	Noted.

**PIM 12/22 Policy CP01g)**

<b>Supports</b>		
Rep Nos	Issues	Response
R1156	Support the proposed modification	Noted.

**PIM 12/23 Inset Map 1**

<b>Supports</b>		
Rep Nos	Issues	Response
R1157	Support proposed modification	Noted.

**PIM 12/24 Inset Map 1C**

<b>Objections</b>		
Rep Nos	Issues	Response
R1204	The area of development has been extended westward, without justification	The Map needs to be read with Chapter 12 of the Inspector's report and Pre-Inquiry Modifications 12/1-12/22. These demonstrate why there have been alterations to the Map.
<b>Supports</b>		
Rep Nos	Issues	Response
R1158	Support proposed modification	Noted.