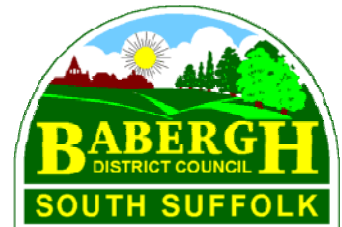


Core Strategy Issues and Options

**Spatial Strategy Section
March 2009**



4 Spatial Strategy for Babergh district

Background

- 4.1. Growth and further development within the district are a 'given' requirement for the district's future and for Babergh's new Plan to address, primarily through the Core Strategy. However, the scale of this growth and how best to accommodate it are the key issues to address. This applies equally to both housing and economic / jobs growth and it is vital that the two are balanced in the interests of ensuring that future development is sustainable. Striking and maintaining this balance will be easier said than done, although the planning approach in Babergh has paid particular attention to ensuring that economic / jobs growth is fostered to avoid an excess of uncontrolled housing growth at the former's expense. A question also arises over whether growth should be housing led or jobs led and this will need consideration within the context of the various questions raised within the Core Strategy.
- 4.2. This Core Strategy must provide a clear Plan for the period from 2011 to 2027, since we are required to plan for at least 15 years of housing supply from the date that this document is adopted (expected to be in 2011, with a planned allowance of 1 year for any substantial, unforeseen circumstances / slippage). The current East of England Plan was adopted recently (May 2008) and covers the period from 2001 – 2021 but whilst this Core Strategy is being produced, the regional Plan is being reviewed in parallel and rolled forward to 2031. So, at the same time, it is necessary to consider the period to 2031. Whether this Core Strategy plans forward to 2027 or 2031 is not a key question, since the strategy will need to provide a sufficiently robust and flexible framework for the district's future development strategy either way. Therefore, it is proposed to look forward primarily as far as 2027 but simultaneously have regard to and allow for circumstances as far as 2031.
- 4.3. The scale of housing development required in Babergh to 2021 is known and this can be projected forward to 2027. This comes from the new regional Plan, which makes it clear that the housing numbers are to be treated as minima to be achieved, instead of ceilings that should not be exceeded. In doing so, it will be necessary to employ the plan, monitor, manage approach towards new housing development.
- 4.4. A good level of guidance is provided to steer a spatial strategy for the district, including national planning policy / guidance and the regional Plan. The current adopted Local Plan also provides a basic framework for the new spatial strategy (having itself been influenced by the Suffolk Structure Plan 2001). These need to be applied to the specific Babergh context and a key question will be to consider how closely these relate to Babergh's current / emerging context and whether there are any specific local circumstances or reasons to diverge from this established policy framework.

4.5. Key evidence base research studies for these themes are:

- Housing Needs Survey 2008
- Strategic Housing Market Assessment (and associated viability study) 2008/9
- Strategic Housing Land Availability Assessment 2009
- Infrastructure Capacity Study 2008/9

Turning to local perspectives on this matter, the Sustainable Community Strategies and other local consultation have the following implications for and links to the district's spatial strategy and key housing issues.

Suffolk LSP	Western Suffolk LSP	Babergh East LSP	BDC Strategic Plan
<p>A prosperous and vibrant economy Affordable, quality housing for all</p> <p>The Greenest County Reduce Suffolk's carbon footprint and adapt to the changing climate</p> <p>Safe, healthy and inclusive communities</p> <p>A sense of belonging within communities that are valued, engaged and supported Cohesive Communities</p>	<p>Develop and maintain a safe, strong and sustainable community</p> <p>Create and support healthier communities</p> <p>Make Western Suffolk a safer place and build a stronger community</p> <p>Protect our natural environment and local biodiversity and ensure sustainable development</p>	<p>Maintaining the quality of the environment</p> <p>Affordable housing</p> <p>Provision and retention of employment sites to encourage economic development (including tourism)</p>	<p>A greener and cleaner Babergh The right balance between protecting the natural environment and supporting development opportunities for the area and its people A smaller carbon footprint for the area</p> <p>Quality homes that local people can afford There are enough good quality homes which meet high environmental and sustainability standards to meet the needs of the people of Babergh. There are enough affordable homes to meet the needs of the people of Babergh. New housing developments are supported by adequate infrastructure improvements. Fewer people are homeless</p> <p>Vibrant places and strong communities Reduce impact of rural isolation, particularly limited access to affordable housing, transport and jobs. Active villages and communities Individuals have a sense of belonging within cohesive communities where everyone is valued</p>

4.6. The geography and settlement pattern of Babergh, with only 2 market towns (of limited size) and its part of the Ipswich fringe built up area, mean that the range of options for accommodating new development are relatively limited for the district. Accordingly, it is not considered necessary to define a rigid settlement

hierarchy for Babergh, which can be helpful in districts that contain many different towns and different types of settlement.

Spatial Strategy

- 4.7. The scale of residential development to provide between now at 2008 and 2027 (5,450 dwellings) is very similar to that to accommodate between 2001 and 2021 (5,600 dwellings) under the adopted Regional Spatial Strategy (or 'RSS'). However, the Core Strategy does not start with a completely 'blank canvas', since much of this development is already planned for (through the recently adopted Local Plan, planning permissions, etc). Accordingly, just over a half (2,950 at least) of these new dwellings are already effectively provided for. The Local Plan set out a distribution of allocated sites as follows:

Sudbury / Great Cornard 1470 (75.5% or 75% rounded)

Hadleigh 190 (9.6% or 10% rounded)

Rural Areas (inc. Ipswich fringe) 290 (14.9% or 15% rounded)

NB All figures rounded

- 4.8. The first key question to address therefore is: What strategy is most appropriate for distributing the remaining housing required for the district's future? Under all these approaches, it would be necessary to ensure that the housing development allocated to each area would be matched by an appropriate level of new jobs.



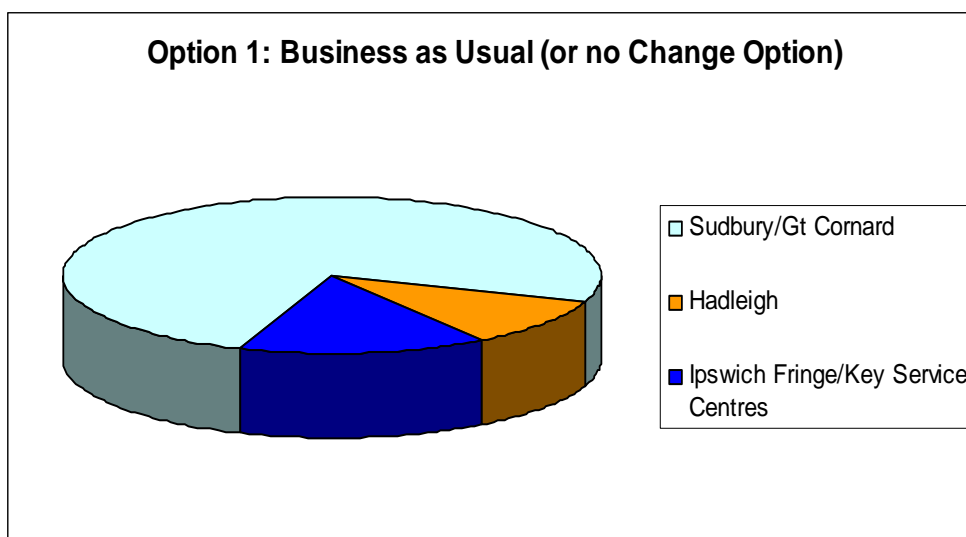
Option 1: Business as Usual (or 'No Change' option)

- 4.9. This option would essentially replicate the approach towards distributing housing development as set out in our existing Local Plan adopted in 2006 but with regard to current RSS allocation targets. This section describes what this would mean for each part of the district:
- 4.10. Sudbury / Great Cornard and adjoining areas would continue to be the location that provides for major scale development, generally in line with the capacity that local infrastructure, local facilities and services already have. This would need to rely on new sites being found within the urban area but in likelihood, mostly further greenfield land at the edges of this, the district's largest urban area. This would mean that the identification of a new large strategic greenfield site (or otherwise sites (2 or more) of a smaller scale, would be necessary and this (or these) would need to be found at edges of the town where major development constraints (such as flood risk) are avoided. Any such strategic site(s) would need to be comprehensive, new, mixed developments providing not only for housing but also for matching employment uses, local services, facilities and infrastructure required to support them. This approach would reaffirm and promote further Sudbury / Great Cornard's role as the district's largest urban

- area, with the greatest concentration of housing, jobs and commercial activities, together with the largest district town centre. In this way, the town's self-containment (including housing - jobs balance and ability to minimize the need for out-commuting) would be strengthened. Under this option, Sudbury / Great Cornard would make by far the largest contribution to meeting the RSS housing target figures.
- 4.11. Hadleigh would receive a far lower scale of new development than Sudbury / Great Cornard but would most probably still need a new development site (or smaller sites) to be found for the town's edge(s). Some of the new housing could be expected to be accommodated on sites within the town but it is likely that much would need to be accommodated on new urban edge, greenfield sites. The town's role as a small market town would be maintained and reinforced slightly and the accommodation of more new jobs and economic opportunities would be required to match the housing growth. Hadleigh would remain as Sudbury / Cornard's much smaller neighbour but its degree of self-containment (including housing - jobs balance and ability to minimize the need for out-commuting) thereby remaining less self-contained than Sudbury/Gt Cornard.
 - 4.12. Key Service Centres and Ipswich Policy Area (Ipswich Fringe/ IPA) is an area where the current Local Plan takes a relatively restrictive stance towards further large-scale residential development on any substantial scale. This is partly because significant residential development already took place here when large parts of Pinewood were developed in the recent past. In addition, the Babergh part of this area is constrained and there is relatively little land available within the A14, which acts as a buffer to new development. This approach could provide for about three quarters or all of the number of homes planned for this part of Babergh by the RSS (to 2021) if some further development is planned and allocated here until 2021. However, it also allows for some flexibility between here and these rural areas (see below). The IPA would need to accommodate the majority of the IPA / rural areas share to remain in line with RSS guidelines beyond 2021. Accordingly, it would probably be necessary to identify a new site to meet the RSS requirements from 2021 to 2027. The key service centres would include those larger villages in the district that meet the criteria of the adopted regional Plan, in relation to having the benefit of local facilities, services and local employment opportunities. Under any of these alternative options, these would need to accommodate the majority of all new development planned for the rural areas beyond Babergh's two market towns and the urban Ipswich fringe (as the best suited locations). This option would require a low rate of further growth from about 2018 to 2021 and onwards. The protection of existing village services / facilities would be necessary.
 - 4.13. Other / Smaller Villages Under this approach these locations that do not meet the requirements of 'Key Service Centres' above are subject to prevailing planning policy at national and regional levels. These require us to take a restrictive approach towards new development overall in the interests of sustainability. New housing would in principle be delivered only at a scale dictated by local housing needs and be mostly affordable housing. This could take the form of infilling within the existing village limits, or redevelopment of other sites, on the occasional basis when such sites come forward. Rural exceptions affordable housing sites, usually at the village edge, would also be acceptable in principle

(for villages with less than 3,000 people) where local affordable housing needs justify such development. The protection of existing village facilities and services would be necessary, alongside encouragement of new or expanded facilities and services where possible. Under this option no new housing would actually need to be provided to meet the RSS requirements.

- 4.14. Other Rural Areas / Open Countryside These areas are also subject to prevailing planning policy at national and regional levels where an even more restrictive approach towards new development applies. This is necessary not only in the interests of sustainability but also for countryside protection. Any new development would require exceptional justification and this can rarely be shown.



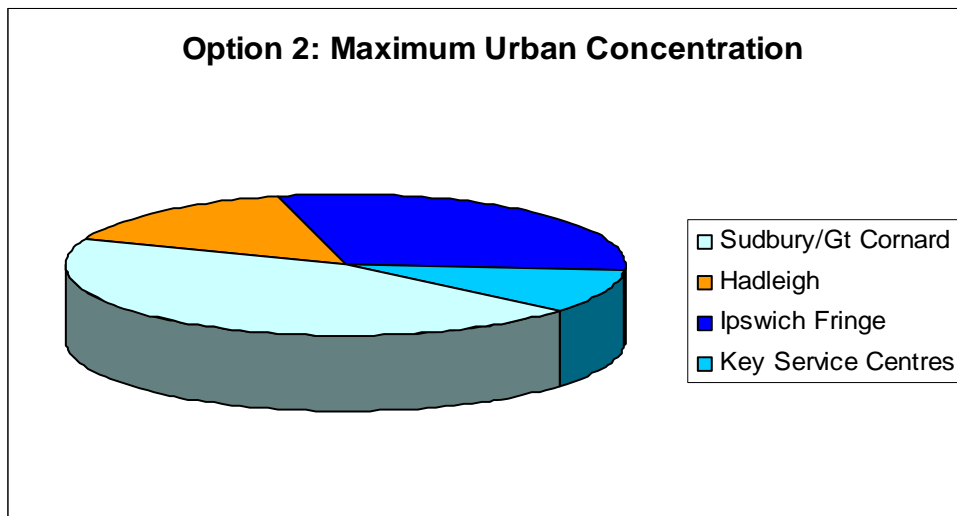
Option	Advantages	Disadvantages
Option 1: Distribution based on Local Plan Allocations	<ul style="list-style-type: none"> ▪ Development rates in market towns would not be significantly different to those achieved in recent years ▪ Affordable Housing needs the greatest in Sudbury & Great Cornard (35%) ▪ Sudbury, Hadleigh and the Ipswich Fringe have access to a range of employment opportunities, services and facilities ▪ Likely that sites would be of a scale that would deliver new facilities and infrastructure ▪ Strengthen self containment of Sudbury and Hadleigh ▪ Most new development takes place in centres where services and infrastructure already exists 	<ul style="list-style-type: none"> ▪ Infrastructure constraints and new demands placed on existing infrastructure, particularly in terms of roads ▪ Allocate greenfield sites that would lead to a loss of countryside and high environmental impact ▪ High levels of commuting from rural areas to Sudbury, Hadleigh and the Ipswich ▪ Villages with good level of services would receive limited additional development to help retain them ▪ Restrict amount of affordable housing in areas other than Sudbury, Hadleigh and Ipswich fringe that would come forward through obligations

	<p>or can be improved</p> <ul style="list-style-type: none"> ▪ Maintain character of rural settlements ▪ Viability of public transport maximised 	<ul style="list-style-type: none"> ▪ Do not address housing needs and need for employment opportunities across the district
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Option 2: Maximum Urban Concentration

- 4.15. This approach focuses strongly on pure sustainability considerations and presents the option based upon maximum concentration of new development upon the district's (limited number of) urban areas. It meets and indeed considerably exceeds the RSS apportionment for the Ipswich fringe, promotes the role of Sudbury / Great Cornard as the district's largest centre and assigns significant growth to Hadleigh. The rural areas (and particularly Key Service Centres) would see minimal growth and change.
- 4.16. Sudbury / Great Cornard this area would receive a larger share of development than the others and its role would remain as the district's main centre. However, development would be spread more evenly and the area would receive far less development than under the approach of Option 1. A significant new urban edge greenfield development site (or perhaps two smaller developments) would probably have to be identified.
- 4.17. Hadleigh would be the location of a higher proportion of development than it currently has planned (under the Local Plan). However, it would still be one third of the number of houses allocated to Sudbury / Great Cornard. This could be expected to require a new relatively large greenfield site at the edge of the town. The town's role would not be changed from its current position. Some growth in the current level of jobs would be necessary to ensure that housing growth is sustainable and to limit out-commuting.
- 4.18. Ipswich Policy Area (Ipswich Fringe) under this approach, the Ipswich fringe would receive a higher proportion of new development than under any other option and would accommodate nearly a third of all new development for Babergh from around 2018 to the end of the Plan period. A large new Greenfield site (or two medium sized sites) would be needed to allow for this growth and this would need to be within the area bounded by the A14, in order to ensure that new development adjoins the existing the existing urban area and does not engulf the villages beyond the A14. This growth would accelerate the current level of growth planned for this area by about 50%.
- 4.19. Key Service Centres the larger villages of Babergh under this approach would receive relatively little new development from about 2018 and this would be quite straightforward to accommodate. Probably no new land allocations would be necessary, with the villages only having to accommodate around about 20 houses per year between a relatively large number of locations. This would represent a slowing down of current development levels and the development of rural exceptions sites for affordable housing would probably be sufficient to meet this level of growth.

4.20. Other Rural Areas / Open Countryside these areas would not need to contribute to meeting the district's housing requirements at all.



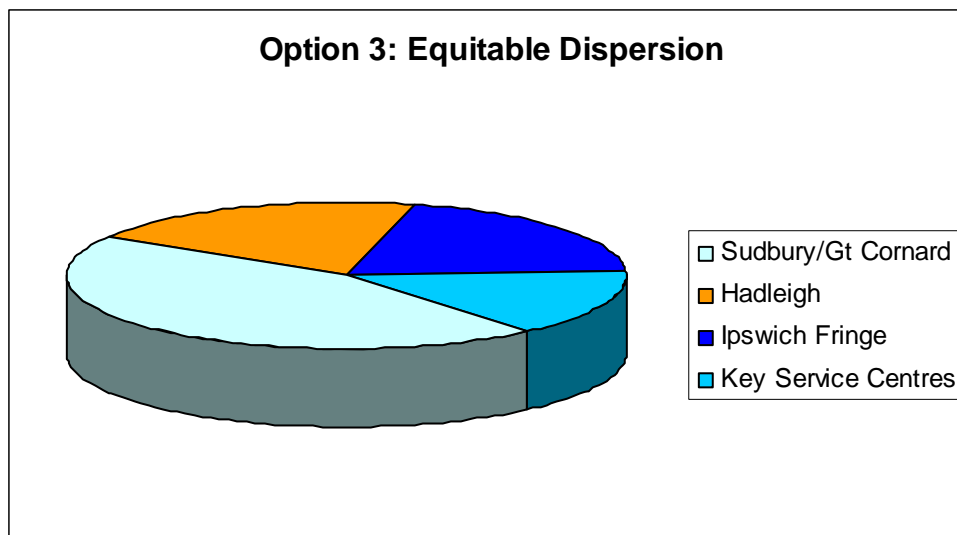
Option	Advantages	Disadvantages
Option 2 : Urban concentration	<ul style="list-style-type: none"> ▪ Affordable Housing needs the greatest in Sudbury & Great Cornard (35%) ▪ Growth would be in Sudbury, Hadleigh and the Ipswich Fringe which have access to a range of employment opportunities, services and facilities and could potentially be improved ▪ Likely that sites would be of a scale that would deliver new facilities and infrastructure ▪ Strengthen self containment of Sudbury and Hadleigh ▪ Maintain character of rural settlements ▪ Viability of public transport maximised 	<ul style="list-style-type: none"> ▪ Development rates in market towns would be much higher than those achieved in recent years ▪ Infrastructure constraints and new demands placed on existing infrastructure, particularly in terms of roads ▪ Allocate large greenfield sites that would lead to a loss of countryside and high environmental impact ▪ The villages with some level of services would not receive additional development to help retain them ▪ Focussing development at Sudbury, Hadleigh and the Ipswich fringe could increase levels of out commuting from smaller centres to Sudbury, Hadleigh and Ipswich fringe ▪ Restrict amount of affordable housing in areas other than Sudbury, Hadleigh and Ipswich fringe that would come forward through obligations ▪ Do not address housing needs and need for employment opportunities across the district

Option 3: Equitable Dispersion

- 4.21. This approach takes into account the need to meet RSS targets for each area, but also emphasizes the capacity of each area and minimizes the concentration of new development upon any single location in the district.
- 4.22. Sudbury / Great Cornard would still be the focus of development, accommodating the largest share but the scale of this share would be reduced very significantly. Growth would be at a lower level than in the past. Its level of growth would still be relatively substantial – at approaching 50% of the district's needs (excluding those for the IPA) and accordingly the level of matching growth in jobs, the economy, facilities / services and infrastructure would need to be similarly substantial. It would still probably require the identification of one new strategic scale, urban edge, development site. Sudbury / Great Cornard's role as the district's main centre would be continued and re-affirmed.
- 4.23. Hadleigh would be in a relatively similar position as that suggested at Option 1 but this option allocates a larger share of the district's development. The growth requirements are double that of Option 1 and accordingly much more urban edge, Greenfield land would be needed. The town's role could be promoted as a slightly larger (market town) whilst retaining Hadleigh's current role as second largest in the district. Opportunities to improve self-containment would be greater.
- 4.24. Ipswich Policy Area (Ipswich Fringe) would also receive much higher growth than under Option 1 (level at least doubled). The RSS housing allocation would be met both up to 2021 and 2027 (or 2031) and slightly exceeded overall. Two new Greenfield sites would probably be needed, one on each side of 2021, to meet / exceed the RSS housing allocation.
- 4.25. Key Service Centres The role of these in providing for meeting the district growth figures would be much greater than under Option 1. However, there is the opportunity to spread this across a relatively large number of locations. This spread would be recommended, as far as practically possible, so as to ensure much of the benefit of this overall growth option and in line with its dispersal ethos. The approach would be highly unlikely to change the role or character of any one settlement materially, given this recommended dispersal across locations.
- It should be noted that the potential redevelopment of known, large, brownfield sites in some such villages could perhaps alter the role and character of those settlements. Whether such redevelopment proposals are to be acceptable or not is a planning decision to be made on the individual merits of those cases and the principle of redevelopment has already been established. The potential redevelopment of these sites should not be confused with the merits of this overall strategy (which does not hinge on the outcomes of those decisions).*

Other / Smaller Villages Approach as Option 1.

Other Rural Areas / Open Countryside Approach as Option 1.

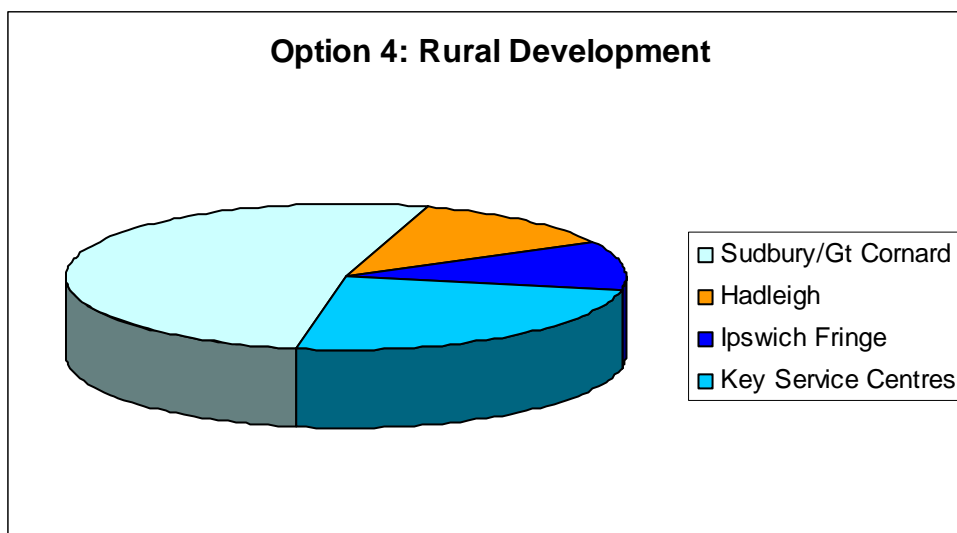


Option	Advantages	Disadvantages
Option 3: Equitable Dispersion	<ul style="list-style-type: none"> ▪ Provide for affordable housing needs across the district as a result of planning obligations ▪ Meet housing demands across the district and the need for job opportunities ▪ Spread environmental impacts throughout the district rather than concentrating it at a few locations ▪ Greater choice in terms of housing and employment opportunities in the district and less reliance upon a few locations ▪ Less commuting from other parts of the district to a few centres within the district ▪ Villages with some level of services would receive additional development to help retain them ▪ Likely that sites would be of a scale that would deliver new facilities and infrastructure 	<ul style="list-style-type: none"> ▪ Allocate greenfield sites throughout the district and this would lead to a loss of countryside ▪ Less affordable housing in Sudbury where need is the highest ▪ Increase in traffic on some rural roads ▪ Infrastructure constraints, this could be a particular consideration in smaller villages

Option 4: Rural Development

- 4.26. This approach would see the larger villages make a greater contribution to meeting district needs, with a similarly reduced reliance upon the 2 market towns and Ipswich fringe.
- 4.27. Sudbury / Great Cornard would receive the largest single share of development but experience much less growth than in the past – as provided for under the current Local Plan. A slightly smaller scale of new urban edge, greenfield site

- and similar supporting development would be required as those for Option 2. As with all options, the town's role would be continued as district centre.
- 4.28. Hadleigh would also see its current role maintained. Urban edge, greenfield land would be required and the prospects for self-containment perhaps improved marginally. Matching employment growth and that of services / facilities would be needed. Growth would be higher than the level planned for in the current Local Plan.
- 4.29. Ipswich Policy Area (Ipswich Fringe) This option allocates the amount of growth expected under the regional Plan, allowing for both the periods pre and post 2021. This would be higher than that allocated in the current Plan and compensate for the anticipated shortfall to 2021. However, the current Plan took earlier and other separate developments into account, so the real difference is not so great. Two new greenfield sites would probably be required, one before 2021 and another after.
- 4.30. Key Service Centres these could collectively make a substantial contribution to district housing needs at a level that would not necessitate considerable growth in local jobs, facilities or services, or infrastructure. The retention / maintenance these would be essential though and where required, improvement / growth. Some of the growth will be able to take place on sites in the villages that emerge but generally, it will be necessary to identify new sites at edges of villages as brownfield or other sites are seldom available in these villages.
- 4.31. Other / Smaller Villages although no overall change of approach is suggested for these, and no material contribution towards meeting district needs is likely, these could have a role in supporting the locations above. This could also provide flexibility and added certainty to ensuring the success of a rural focused strategy. Appropriate locations of this kind could also help ensure a good spread of development around the district and the delivery of housing for local needs for constrained locations (such as AONBs).
- 4.32. Other Rural Areas / Open Countryside no change of approach appropriate

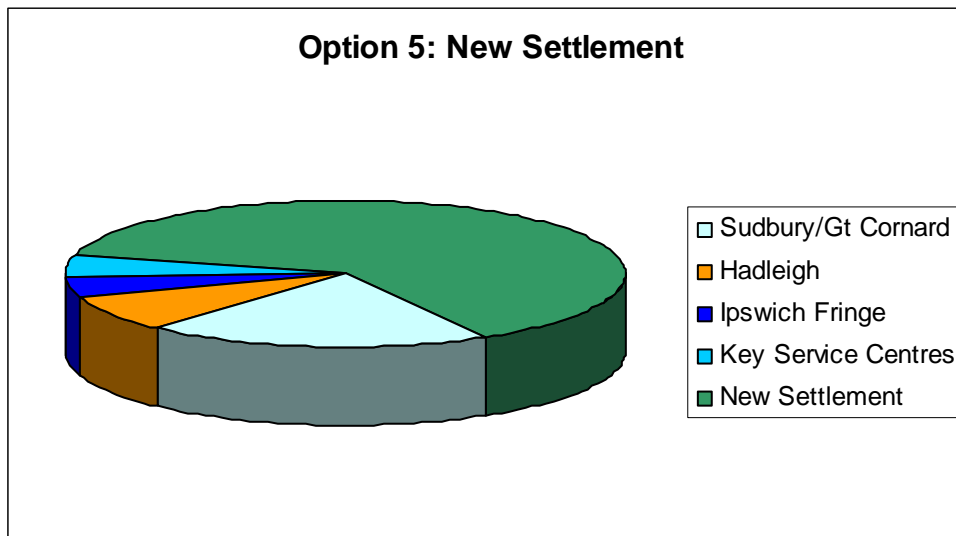


Option	Advantages	Disadvantages
Option 4: Rural Development	<ul style="list-style-type: none"> ▪ Provide for affordable housing needs across the district as a result of planning obligations ▪ Meet housing demands across the district and the need for job opportunities ▪ Spread environmental impacts throughout the district rather than concentrating it at a few locations ▪ Greater choice in terms of housing and employment opportunities in the district and less reliance upon a few locations 	<ul style="list-style-type: none"> ▪ Allocate greenfield sites throughout the district and this would lead to a loss of countryside and high environmental impact ▪ Less affordable housing in Sudbury where need is the highest ▪ Increase in traffic on some rural roads ▪ Sites not be strategic enough to contribute to community benefit ▪ Scale of growth in settlements not sufficient to contribute to the viability of services and facilities ▪ Viability of public transport would be questionable ▪ Infrastructure constraints, this could be a particular consideration in smaller villages ▪ Adverse impact on character of rural villages

Option 5: New Settlement

- 4.33. Under this option a completely new, small community of somewhere initially in the region of 1,000 – 1,500 new homes (but allowing for a greater level of future growth for future Plan periods, including to 2031 and beyond) could accommodate the vast majority of the new homes needed in the district. At only 1,000 – 1,500 dwellings, the development would not be realistic and this could only be pursued if a longer time period and much larger new settlement is planned for. This would have to be matched by the same scale of new jobs and all other supporting development, including jobs, facilities, services and infrastructure of all 3 kinds. This option could also only be possible in the latter part of the Plan period, given the inevitable long lead-in time involved. If pursued in this way, it would allow for a relatively low level of housing development in the interim period (around 2018 – 2021) at a level sufficient to meet pressing housing needs and maintenance / growth of jobs and the economy. This development approach would not be in accordance with the current RSS but could be contemplated if the emerging RSS review creates favourable conditions for such an approach.
- 4.34. Sudbury / Great Cornard and adjoining areas would receive far lower growth than in the recent past over the latter part of the Plan period, from 2018 to 2027 (or 2031). In the early part of the period, the level of growth would be likely to be relatively similar to recent years. The identification of new sites at the town's edge would not be necessary. The town's role would not change and it would remain as the district's main centre in all respects.

- 4.35. Hadleigh would receive lower growth levels than those of the past and than what is planned for 2008-2018, for the latter Plan period years. The modest growth level would need to be matched by a commensurate (modest) growth in jobs, the economy, services, facilities and infrastructure. By 2018 sufficient sites will most probably emerge in the town to negate the need to find any new land around the town's edges. Hadleigh's role would not change and it would remain as the district's second market town and centre of population.
- 4.36. Ipswich Policy Area (Ipswich Fringe) This approach would provide for three quarters (or otherwise all) of the number of homes planned for this part of Babergh by the regional Plan (to 2021) and /or the current RSS development level post 2021, depending upon progress of the new settlement. Either way, finding a new Greenfield site to provide for the period up to / beyond 2021 would be necessary. The new settlement approach would indicate a reduced need to adhere rigidly to the RSS growth here and this lower development level could be applied before or after 2021.
- 4.37. Key Service Centres would need to collectively accommodate beyond 2018 / 2021 only a half of what the current Local Plan allocates to these areas. Development could be spread thinly, with minimal impact, across a number of locations throughout the district. The protection of existing village services would be necessary.
- 4.38. Other / Smaller Villages Under this approach no new housing would need to be provided in these locations to meet the RSS requirements (but the emphasis would be on meeting local needs – throughout the Plan period).
- 4.39. Other Rural Areas / Open Countryside Approach as before.



Option	Advantages	Disadvantages
Option 5: New Settlement	<ul style="list-style-type: none"> ▪ Maintain character of rural villages and market towns ▪ New development would be of a 	<ul style="list-style-type: none"> ▪ The villages with some level of services would not receive additional development to help

	<p>scale that would deliver new facilities and infrastructure</p> <ul style="list-style-type: none"> ▪ Viability of public transport maximised ▪ Reduce pressure for allocation of Greenfield sites in market towns and villages ▪ Provide opportunity for sustainability principles to be included in the construction of the new settlement 	<p>retain them</p> <ul style="list-style-type: none"> ▪ Do not address housing needs and need for employment opportunities across the district ▪ Vitality and viability of new settlement is not a given and this could lead to high levels of out-commuting
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Question SS1: Please state your preference(s) on these options, ranking them from 1 to 4, with 1 for your greatest preference and 5 for your least favoured approach

Please give reasons for your choices

Question SS2: Are there any other options / approaches that you consider would be preferable, as well as viable, realistic and deliverable (and beyond minor variations of these options)?

Housing (and other) Development in Rural Areas

- 4.40. The above spatial strategy deals with large scale housing to meet the relatively substantial numbers of dwellings that will be required in Babergh in future, over a 15 – 20 year timespan. Accordingly, that section is concerned with defining a strategy on where to allocate significant new numbers of housing to meet the vast majority of our future housing requirements. The vital distinction to draw between the last section and this one is that this section is concerned with defining the appropriate planning policy framework for how the council should respond to housing development proposals in rural areas. In the interests of sustainability, the environment, local infrastructure, facilities and services it is not proposed to radically change the existing policy position to a new context whereby the rural areas of Babergh would accommodate a large share of the district's housing needs – when considering the housing numbers involved (please see table below).
- 4.41. This issue is often contentious and it generates greatly contrasting views. It is considered necessary to set an appropriate and clear policy framework for determining how much development Babergh's rural areas should accommodate in future. At present there is a 3-tier approach as follows:
1. Sustainable Villages (mostly the larger villages with a range of facilities / services, job opportunities and / or reasonable public transport provision)
 2. Unsustainable Villages (mostly the smaller villages, generally lacking the above advantages)
 3. Open countryside (including very small villages / hamlets, clusters of housing, individual houses, and undeveloped areas)

- 4.42. Housing development in the larger / sustainable villages is currently permitted in groups of unlimited size and housing developments of various sizes are allocated on sites identified in the Local Plan. In addition, rural affordable housing exception sites villages are also possible for villages with a population of less than 3,000 people (the vast majority of Babergh's villages). Housing development in these rural areas is restricted to infilling by groups within the village confines (and defined boundaries) to a scale of 3 houses in the unsustainable villages. However, in practice, large sites rarely exist in any case. Development outside the 2 categories of villages is unacceptable (except for small affordable housing only schemes).
- 4.43. Work has been carried out to review which villages should be in the sustainable villages category in future and those to be in the unsustainable villages category, to ensure that these remain up-to-date. These will be set out in a subsequent development plan document (DPD). Babergh's approach needs to be logical, consistent and in line with planning policy at national and regional levels, unless there are specific local circumstances of sufficient stature to warrant departing from this.

Question SS3: Do you think that there is a need to change the above approach in any substantive way (beyond minor details) in respect of either sustainable villages or unsustainable villages?

If so, how would you suggest this approach to rural housing development should be changed?

Please give reasons for your answers

Question SS4: If the current Local Plan policy approach is to be changed please indicate what level of housing development that you consider would be appropriate for the smaller / unsustainable villages – according to the 4 options outlined below.

Please give reasons for your answer

Option 1: no change – development in groups up to 3 dwellings

Option 2: limited change – development permitted in groups to 5-6 dwellings

Option 3: greater change – development permitted in groups up to 10-12 dwellings

Option 4: maximum change – development permitted in groups up to 15 dwellings

Question SS5: Bearing in mind the need for a rational / consistent approach, are there any particular rural locations that you consider should either receive or be precluded from further housing development, where this may not appear to be in accordance with prevailing planning policy?

Please give reasons for your ideas

- 4.44. The largest villages in Babergh (which have a development of 3,000 people or more) currently face a difficult problem in that the use of rural affordable housing sites in these locations is not possible, as any new houses built of these kind would be subject to the right to buy and thus the houses would not remain

affordable in perpetuity. It is therefore necessary to consider a different way of delivering affordable housing for these locations. One approach would be to allocate new sites that could be either for open market housing with an element of affordable housing or to allocate sites entirely for affordable housing – subject to the availability of privately owned sites coming forwards – which cannot be guaranteed.

Option 1: Allocate sites including open market housing and affordable housing together – possibly with a higher percentage of affordable housing than other allocated housing sites

Option 2: Allocate sites for affordable housing only

Option 3: Any other approach – please offer suggestions

Question SS6: What do you consider would be the most appropriate way of delivering new affordable housing in Babergh's largest villages that cannot benefit from rural exceptions affordable housing sites?

Meeting Housing Growth

- 4.45. Babergh is required to provide at least 5,600 dwellings under the recently adopted regional Plan from 2001 – 2021. The district allocation is envisaged to provide 600 in the Ipswich Policy Area and 5,000 for the remainder of Babergh district. This means delivering 280 net new homes per year on average (including 30 in the IPA). For the period after 2021, the current requirement is to plan for this level, plus the annual rate calculated when any previous delivery shortfall is taken into account. The Council is required to plan for housing delivery for at least a 15-year period in new Plans. Accordingly, this Core Strategy looks to 2027, given its expected date of adoption in 2011 and allowing a one-year period for any contingencies. The Core Strategy also needs to have regard to the period to 2031, as the RSS is being reviewed in parallel and rolled forward to 2031. The Core Strategy will address all these considerations.
- 4.46. Housing delivery is closely monitored through the Annual Monitoring Report and managed as far as possible. This report therefore draws upon the latest report – for the year 2007-8 and results / findings for 2008-9 will be incorporated at the next stage of the Core Strategy. The latest AMR shows that we must plan for 287 dwellings per year for Babergh over the new Plan period, since delivery to date has been close to (but just under) the RSS levels. For the IPA, housing delivery has been slightly in excess of the level that the RSS indicates. Delivery is expected to drop in the next few years, due to the current adverse economic conditions. Recovery in the economy, housing market and delivery is anticipated within a few years from now (although of course, this is uncertain). At present, therefore, it is certainly a possibility (if not likelihood) that the district's very healthy current housing land supply will last for longer than the 10-year period (2018-19) that we know it can currently provide for. The Core Strategy's primary purpose, therefore, is to set out a clear development strategy for the years beyond then to 2027 / 2031.

This table sets out the position on housing requirements and past delivery, relying upon data collected for the latest AMR (as of 1st April 2008):

1	RSS requirement 2001 – 2021			5,600 (5,000 + 600)
2	Number built already (2001 - 2008)		1,870	
3	To provide 2008-2021			3,730
4	Annual Provision 2008-2021 / 2027		287	
5	To provide 2008-2027	287 x 19 years		5450
6	Commitments		1,210	
7	Remaining Plan site allocations		1,740	
8	Total		2,950	
9	Residual (to provide 2008-2027)			2,500
10	Allowance for 'windfalls' from 2021 - 2027	96 x 6 years	570 (round to 500)	
11	Sum to plan for / allocate			2000

- 4.47. Although the housing requirements can be calculated quite easily and precisely starting from the RSS allocations and applying all the known elements of housing supply, the RSS requirements are cited as minima to be achieved, rather than ceilings not to exceed. It is therefore necessary to consider what the most appropriate level of supply would be to plan for.
- 4.48. On the one hand, there may be potential benefits, such as increasing the general affordability of housing (as is the Government's view) and delivering a greater amount of affordable housing, 'on the back of' more open market housing. This may also provide greater flexibility and a greater chance of ensuring that minimum delivery figures are met. On the other, it may be that planning / allocating more supply has no real prospect or guarantee of higher delivery. In addition, it may be the case that merely increasing supply overall would be less effective than focusing efforts on delivery of affordable housing only, as could be the case in current economic conditions. Whichever approach is chosen, careful regard needs to be paid to ensuring that delivery is appropriate in relation to economic and jobs growth; plus capacities of the environment, infrastructure and local communities to absorb / assimilate new development. Otherwise we would fail to deliver sustainable growth and conflict with the over-arching objective of the planning system, long-established planning policy at all levels and this Plan.

<p>Question SS7: Should this Plan aim to provide for the adopted RSS housing numbers (280 / 287 per year) or otherwise less or more than these numbers?</p>
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Please state why and give justification / evidence for your answer

- 4.49. Please note that a housing development trajectory will be produced in a subsequent version of this document when broad parameters and key issues / questions have progressed further towards resolution.

Brownfield Land Use

- 4.50. Although this has often been seen primarily as a requirement for housing development there appears no reason why this should not apply equally to all development, including new employment / commercial and other forms of development. Nationally, a target is set that at least 60% of new housing should be built on previously developed land. The regional Plan also uses this same target. Consideration needs to be given to whether this applies appropriately to the local Babergh context or whether a different local target should be set. The prioritization of brownfield land development has caused some problematic issues in the Babergh district, as it has led to significant pressure to redevelop the district's scarce employment land supply for residential redevelopment. In addition, it can involve greater issues of financial viability associated with preparing sites for development that casts the delivery of affordable housing in doubt.

Question SS8: how great a priority do you consider should be attached to developing brownfield land before greenfield land?

Question SS9: Do you consider that the Babergh target for development on brownfield land should accord with national and regional targets of 60% or be set either lower or higher?

Question SS10: Do you consider that this should apply in the same way to all other new development (and if so, at the same target level)?

Please state why and give justification / evidence for your answer

- 4.51. A brownfield land development trajectory will be produced in subsequent more detailed development plan documents (DPDs) when the likely distribution of development has been established.