

Place Directorate

Responsible for the Economy
and the Environment



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Dear Mr Ware

Revocation of the adopted Regional Strategy – the East of England Plan (2008)

Thank you for your letter dated 17 December 2012 regarding the above matter, the contents of which are noted and understood. Please accept my apologies for not replying sooner; however, a period of sickness absence served to delay the completion of this exercise.

In response, the Council has considered its position carefully in relation to the submitted Core Strategy & Policies (2011-2031) document (with Proposed Modifications). The Council does not consider that the revocation needs to impact on the progress of the examination process or that it has a fundamental bearing on the conclusion of the submitted Core Strategy. I wish to articulate the Council's response as concisely as possible and this will cover 6 areas of consideration, set out in turn below.

1. The first point, which is central to the whole response, is that the intention to revoke the adopted RS has been known for a substantial period of time. The intention to revoke RSs, starting with the East of England Plan, was made very clear in the coalition Government's manifesto and related material. The first action to revoke (although unsuccessful at that time) took place in mid 2010. It has accordingly been necessary to proceed with the draft Plan on the understanding that such revocation could occur at any current or future point in time and suitable allowance / provisions were made to address this possibility or likelihood. Similarly, the introduction of the National Planning Policy Framework (NPPF) was known about in 2011 and it was considered appropriate to make a number of changes to the Core Strategy in response to this. The NPPF was a significant reason for agreeing the approved modifications when these were conceived and it was decided to consider, publicise in the public domain and consult on these, in advanced of the examination process. The influence of the NPPF on the Plan meant the inclusion of features / elements that diverged from the RS.
2. Secondly, the Council chose to respond positively and decisively to the intended revocation through a series of inter-related actions. The first of these was a decision not to proceed with the original 'Preferred Options' version of the Core Strategy in mid 2010. Instead, a decision was taken to step back, review the Council's position and to proceed only after reconsidering our approach. Later that year, a comprehensive review took place of future planned growth levels and the Council's strategy and approach to planning and delivering that growth. This was done in close co-operation with Babergh's communities, particularly its constituent town and parish councils. The outcomes of this review directly informed the preparation of a very

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different, revised new Plan document. Key features included the establishment of a jobs-led Plan and a new emphasis on the Council's positive and innovative approach towards rural growth and sustaining our existing pattern of rural communities. These features stemmed from a broad consensus of views expressed by the local community representatives. The new approach is considered to better reflect local views and aspirations and the local distinctiveness of Babergh district. Although the comprehensive growth review and development of a very different type of Plan meant significant delays to the Plan preparation process, it is considered that this resulted in a better Plan document and the Council's Members have supported the new Plan with considerable preference over its predecessor.

3. Another consideration is that although the RS was revoked, its central features concerned delivering sustainable development, as well as relatively ambitious growth levels. The importance of sustainable development remains unchanged in planning overall and for the purposes of Babergh's submitted Plan. The Core Strategy also proposes relatively ambitious growth aspirations and it recognises that delivering these will be challenging but beneficial.
4. A specific area of the Plan that merits a reference is that of planning for Gypsies and Travellers, since this formed the subject of a specific, single issue review of the RS. Although Babergh has never had significant levels of occupation by, or demonstrable demand from, these communities, the RS single issue review set a pitch provision requirement of 15 pitches to be provided in Babergh by 2011, as a local contribution to a planned regional redistribution and widening of choice for settlement options available to Gypsies and Travellers. The Council has instead followed the approach and requirements of national policy (in the NPPF) and will accordingly identify its own needs and set its own level of provision requirements through the new Plan.

Emerging evidence again suggests that the level of requirements for permanent pitches remains very low. The anticipated scale of pitch provision requirements for the district are deemed far too small to merit any form of land allocation at the strategic scale characteristic of a strategic, Core Strategy Plan. The Council considers that its local circumstances indicate that the most appropriate vehicle(s) for planning in this area would be subsequent, more detailed and specific elements of an overall new Local Plan. As a result, the Council considers that this is not an issue requiring prolonged consideration or debate, beyond ensuring a joint, co-ordinated approach, working closely with all relevant partners and the resolution of collective requirements for transit site provision, in a suitable location(s) for Suffolk as a whole. It is recognised also that this subject forms Matter 7 for consideration through the examination process, so RS revocation and related planning considerations will receive attention through that process.

5. Another specific issue is that of co-ordinated planning for the wider Ipswich area and the Haven Gateway sub-region. Both of these geographies and growth locations were specifically identified for policy purposes in the RS. Whilst its revocation can be considered to create a void in formal policy planning for these areas, these concerns will need to be addressed through a successful response to the new Duty to Co-operate. In this respect, both Babergh and Mid Suffolk Councils currently remain committed and supportive partners in the Haven Gateway Partnership and remain committed to working jointly towards planning and delivery of growth within this geographical area in principle, regardless of the precise arrangements or structures for this, which are under review. In addition, they have both formally confirmed their endorsement of the 'Ipswich Policy Area Board', which provides a relatively formal forum for planning and delivery of growth and promoting the local economy in particular for this geographical area.

There also appears to be no reason why such elements of the RS, or others if appropriate, could not be incorporated into new Development Plans for the district and advice from Government on RS revocation recognises that this option is a valid and potentially useful response. The Core Strategy recognises and addresses the IPA and that this represents a sustainable location to provide for some of Babergh's growth needs. This growth could also help to meet needs arising from the borough itself if necessary, although Ipswich has an adopted Core Strategy that plans for the growth needs of Ipswich, recognising that some of this will probably need to be met within the wider IPA. Babergh's economic growth strategy in particular, recognises and responds to this issue and makes provision for meeting requirements for new employment land within the IPA and helping to maintain / grow Ipswich's economy and to meet new jobs provision requirements.

6. Finally, the subject of climate change merits a reference. The RS took a positive and proactive approach towards this matter. The Core Strategy includes an overall policy position and strategy on this subject area and recognises that it needs addressing through the Core Strategy but also through subsequent more detailed and specific elements of an overall new Local Plan. A tangible example is that of defining suitable areas of search and potential for renewable energy generation of any substantial scale, alongside areas generally far less suitable for such facilities (such as Areas of Outstanding Natural Beauty). Being generally not site-specific (other than including strategic land allocations that are important to the planning and delivery of the development and growth strategy), it is considered that such locational / site-specific matters would be better addressed in any subsequent site specific plan document(s).

I hope that this provides sufficient information but please do not hesitate to contact me if I may be of further assistance. I am aware that the current consultation exercise invites other interested parties to express their own views regarding this matter, insofar as the submitted Plan is concerned. Consequently, I appreciate that further deliberations and discussion may be necessary as a result of any other 3rd party representations received.

Yours sincerely

Mr Rich Cooke
Corporate Manager – Spatial Planning Policy