

## **Examination of the Babergh and Mid Suffolk Joint Local Plan**

### **Main Modifications Consultation – Explanatory Note from the Inspectors**

- 1.01 The Babergh and Mid Suffolk Joint Local Plan (Pre Submission Reg 19 Document, November 2020) (Document A01 in the Core Document Library on the examination website) was submitted for examination on 31 March 2021 and hearing sessions took place in June, September and October 2021. At the Matter 4 (*Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process*) hearing session we explained our significant concerns about the robustness of the housing site selection process and, thus, the soundness of the sites allocated in the plan and its related spatial strategy. In the light of this the Matter 9 and 10 hearing sessions into the specific housing site allocations and the overall supply of housing land were not held as planned. We subsequently wrote to the Councils on 9 December 2021 proposing a suggested way forward for the plan and examination (Document G09) – in summary this would make the submitted plan a Part 1 Local Plan to be followed in due course by a Part 2 plan.
- 1.02 In that letter we noted that the vast majority of the plan area's housing requirement figure, detailed in policy SP01, is already provided for by existing dwelling completions, sites under construction, sites with full or outline planning permission, sites with a resolution to grant planning permission subject to s106 agreement, allocations in made Neighbourhood Plans and a, reasonable, allowance for windfall dwellings. Consequently, the Councils are in the unusual situation in which demonstrating a supply of developable housing land for the vast majority of the plan's overall housing requirement figure is, for some years to come, unlikely to be dependent on the allocation of the housing sites included in the submitted plan.
- 1.03 Therefore, to enable the plan to be found sound, we proposed deleting the housing site allocations from the plan and retaining the settlement boundaries shown on the current policies map (ie not those shown on the submission policies map submitted with the plan for examination). Whilst the settlement boundaries are likely to require review and updating in due course we are satisfied that for the short-medium term they will enable the districts' development needs to be met whilst recognising the intrinsic character of the countryside in accordance with the National Planning Policy Framework.
- 1.04 The letter also sets out at paragraph 9 a number of other modifications to the plan we considered were likely to be necessary for it to be sound, including in respect of the policies for accommodation for gypsies, travellers and travelling show-people (LP09), open space designations (LP30) and the other modifications we had indicated were necessary at the Matter 1a,1b, 2, 3, 5, 6, 7 and 8 hearing sessions.
- 1.05 At an exploratory meeting on 16 December 2021, the Councils confirmed their wish to proceed with the plan on this basis. However, in view of the further work we indicated was likely to be necessary in respect of policy LP10 (Moorings, Marinas and

Houseboats), the Councils have subsequently proposed deleting this policy from the Part 1 plan and they instead intend to address the issue in the Part 2 plan. Furthermore, they have proposed protecting open spaces through a modified policy LP31 (now renumbered LP28) rather than by use of policies map designations. Subject to consultation comments on them we consider that both of these approaches are appropriate ways of addressing soundness problems with the plan as it was submitted for examination. The Councils have revised their Joint Local Development Scheme to reflect the Part 1 and Part 2 plans as now proposed.

1.06 In liaison with us the Councils have prepared the resulting modifications to the plan and these have been the subject of Sustainability Appraisal and Habitats Regulation Assessment. Representations on these modifications (Doc J01) and supporting documents (Doc J05 & Doc J06) are now sought.

1.07 Representations are only sought on the proposed modifications to the plan and the changes to the submission policies map. Representations on aspects of the plan unchanged from the Submission Document (Doc A01) will not be accepted.

1.08 The modifications and changes comprise:

- i. Main Modifications (MMs) which, at this stage, we consider are necessary for the plan to be sound. These modifications are put forward without prejudice to our final conclusions on the plan and we will have regard to the representations made in respect of them in reaching our final conclusions.
- ii. Additional Modifications (AMs) which have been proposed by the Councils and which do not materially alter the policies of the plan. These are mostly the correction of typographical or minor factual errors and changes to the plan's supporting text consequential to the Main Modifications. The Councils will consider any representations received on the Additional Modifications before adopting the plan.
- iii. Changes to the submission policies map to ensure that, as the geographical expression of the plan's policies, the plan is sound.

## **Policies Map Changes**

1.09 The changes to the submission policies map (*Online Policies Map for Babergh and Mid Suffolk Joint Local Plan – Pre-submission (Reg19) document*) are:

- i. LS01 and all "Policy LA" allocations have been removed, consistent with the main modification deleting these plan policies;
- ii. The settlement boundaries have been altered to reflect those on the extant Policies Map (including those defined in made Neighbourhood Plans as of 15 December 2022). This is consistent with the main modification of policy SP03 (The Sustainable Location of New Development);
- iii. Other policies map designations defined in Neighbourhood Plans made between the preparation of the submission policies map and 15 December 2022 are shown;

- iv. Strategic Employment sites are shown and numbered, consistent with the main modification of policy SP05 (Employment Land);
- v. Designated Open Spaces have been removed, consistent with the main modification deleting policy LP30 (Designated Open Spaces);
- vi. Proposed defined moorings and marinas have been removed, consistent with the main modification deleting policy LP10 (Moorings, Marinas and Houseboats);
- vii. The following allocations defined by saved policies of Babergh Core Strategy (2014), Mid Suffolk Stowmarket Area Action Plan (2013), Babergh Local Plan Alteration No.2 (2006) are shown:

#### Babergh

- a) CS4 – Chilton Woods Strategic Land Allocation and Strategy for Sudbury / Great Cornard
- b) CS6 – Hadleigh
- c) CS7 – Strategic Site Allocation – Babergh Ipswich Fringe
- d) CS10 – Brantham Regeneration Area Allocation
- e) CR15 – Houseboats at Pin Mill

#### Mid Suffolk

- f) SAAP5.6 – Allocation for Mixed Use Development – The Station Quarter Allocation
- g) SAAP6.5 – Stowmarket North and North West – Development Around Chilton Leys Allocation
- h) SAAP6.13 – Stowmarket North – The Ashes Allocation
- i) SAAP6.20 – Stowmarket South – Land Off Farmers Road/Poplar Hill Allocation

1.10 Duly made representations may only be made in writing and are encouraged via the Babergh and Mid Suffolk District Councils' [Local Plan Consultation Portal](http://www.babergh.gov.uk/jointlocalplan) on the website at [www.babergh.gov.uk/jointlocalplan](http://www.babergh.gov.uk/jointlocalplan) and [www.midsuffolk.gov.uk/jointlocalplan](http://www.midsuffolk.gov.uk/jointlocalplan)

Alternatively, these can be sent to:

E-mail: [localplan@baberghmidsuffolk.gov.uk](mailto:localplan@baberghmidsuffolk.gov.uk)

Postal: Babergh and Mid Suffolk District Councils, JLP Modifications, Strategic Planning Policy Team, Endeavour House, Russell Road, Ipswich. IP1 2BX.

1.11 In the light of the representations made on the Main Modifications and the changes to the submission policies map we will consider whether or not any further hearing sessions are necessary.

*Malcolm Rivett and Alison Partington*

INSPECTORS