# Babergh and Mid Suffolk Joint Local Plan

Consultation Statement (March 2021)



## **Table of Contents**

Executive Summary of Key Consultation Stages	4
Introduction	5
Babergh and Mid Suffolk Joint Local Plan – Consultation Document (Regulation 18) August 2017	ε
(Reg 18) Summary of the main issues raised during the 2017 Draft JLP consultation and how they have been taken into account	7
Housing	7
Economy	11
Environment	12
Communities	14
Infrastructure	15
Place Section Comments (2017)	16
Babergh and Mid Suffolk Joint Local Plan – Preferred Options (Regulation 18) July 2019	22
(Reg 18) Summary of the main issues raised during the 2019 Draft JLP consultation and how they have been taken into account	23
Strategic Policies (SP01 to SP10)	23
Local Policies (LP01 to LP35)	31
Place Section – Main Issues Raised (2019) and how they have been taken into account	43
Babergh Place Section	43
Mid Suffolk Place Section	58
Babergh and Mid Suffolk Joint Local Plan – Pre-Submission (Regulation 19) November 2020	76
(Reg 19) Summary of the main issues raised during the 2020 JLP consultation	77
Vision, Objectives and Duty to Cooperate	77
Strategic Policies (SP01 to SP10)	77
Local Policies (LP01 to LP35)	82

## Babergh & Mid Suffolk Joint Local Plan Consultation Statement (March 2021)

	Place Section – Babergh	91
	Babergh - Ipswich Fringe	91
	Babergh – Market Towns and Urban Areas	95
	Babergh – Core Villages	96
	Babergh – Hinterland Villages	99
	Babergh – Hamlets	101
	Place Section – Mid Suffolk	103
	Mid Suffolk – Ipswich Fringe	103
	Mid Suffolk – Market Towns and Urban Areas	106
	Mid Suffolk – Core Villages	108
	Mid Suffolk – Hinterland Villages	113
	Mid Suffolk – Hamlets	115
	General comments on JLP	117
	Sustainability Appraisal	117
	Habitats Regulations Assessment	118
٩p	pendix A – Regulation 18 Who Was Consulted	119
٩p	pendix B – Consultation Materials	122
	Copy of Letter Sent to Joint Local Plan Consultees – Dated 22 <sup>nd</sup> July 2019	123
	Copy of Email sent to contacts on the Babergh and Mid Suffolk Joint Local Plan Consultation Mailing List 22 <sup>nd</sup> July 2019.	124
	Copy of Notice of Public Consultation – East Anglian Daily Times 22 <sup>nd</sup> July 2019:	126
	Example of Press Articles & Social Media Posts	127
	Copy of A5 leaflet sent to all addresses in the Districts in 2017	128

#### **Executive Summary of Key Consultation Stages**

Babergh and Mid Suffolk Joint Local Plan: Consultation Document (Regulation 18) (August 2017) consulted on from 21st August 2017 to 5pm on 10th November 2017.

- 13,937 representations.
- 3,958 objections.

Babergh and Mid Suffolk Joint Local Plan: Preferred Options (Regulation 18) (July 2019) consulted on from 22nd July 2019 to 4pm Monday 30th September 2019.

- 4,437 representations.
- 2,961 objections.

Babergh and Mid Suffolk Joint Local Plan (Regulation 19) (November 2020) consulted on from 12<sup>th</sup> November 2020 to 12 noon on 24<sup>th</sup> December 2020.

- 1,681 representations
- 1,304 objections

#### Introduction

- 1. This Consultation Statement provides an overview of consultation and stakeholder involvement in the production of the Babergh and Mid Suffolk Joint Local Plan (the 'JLP').
- 2. In accordance with Regulation 22(c) of the Town and Country Planning (Local Planning) Regulation 2012 and the Council Statement of Community Involvement (SCI), this document sets out:
  - Which bodies and persons were invited to make representation under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012.
  - How those bodies were invited to make representations.
  - A summary of the main issues raised by representations received.
  - How these representations have been taken into account.
  - The number of representations made pursuant to Regulation 20 of the Town and Country Planning (Local Planning) Regulations 2012 and a summary of the main issues raised.
- 3. In November 2020, the Councils produced an addendum to the Babergh and Mid Suffolk Statement of Community Involvement (the 'SCI'). The original SCI (February 2019) and addendum (November 2020) are available on the Councils website, and Core Document Library (Documents A12 and A13).

#### Babergh and Mid Suffolk Joint Local Plan - Consultation Document (Regulation 18) August 2017

- 4. **From 21<sup>st</sup> August 2017 to 10<sup>th</sup> November 2017** the Councils consulted on the Babergh and Mid Suffolk Joint Local Plan Consultation Document (Regulation 18 Stage)<sup>1</sup>.
- 5. During the consultation, the Joint Local Plan and comment forms were made available at libraries within the Districts. Paper copies of the Sustainability Appraisal, Joint Local Plan and comment forms were made available at the Council offices<sup>2</sup>. Hard copies of the Joint Local Plan Consultation Document were provided to all Town and Parish Councils within the Districts.
- 6. Six public drop in events were held in the District's during October 2017, which allowed communities to find out more about the Joint Local Plan and speak to the Strategic Planning Team. Approximately 1,240 people attended the events. Additionally, all Town and Parish Councils within the Districts were invited to attend briefing sessions with Council officers.
- 7. The Councils accepted representations via an online consultation portal, by email and by letter either by post or hand delivered to the Council offices. A total of **13,937 representations** were received during the consultation from **1,370 respondents**. 52.7% of representations were made using the Councils Joint Local Plan consultation portal (online), 32.5% were made via email and 14.8% were made by letter. Two petitions were provided to the Councils.
- 8. The main issues raised during the consultation and how they have been taken into account, have been broken down into the following themes:
  - Housing;
  - II. Economy;
  - III. Environment;
  - IV. Communities;
  - V. Infrastructure; and
  - VI. Place comments (Potential development sites and proposed settlement boundaries).

<sup>&</sup>lt;sup>1</sup> Document B02 in the Babergh and Mid Suffolk Core Document Library

<sup>&</sup>lt;sup>2</sup> Please note that at the time the Council's offices were in Hadleigh (Babergh District Council) and Needham Market (Mid Suffolk District Council).

9. Where reference is made to evidence documents, these and all available evidence documents, are available on the Councils website <a href="https://www.babergh.gov.uk/planning/planning-policy/evidence-base/current-evidence/">https://www.babergh.gov.uk/planning/planning-policy/evidence-base/current-evidence/</a> or <a href="https://www.midsuffolk.gov.uk/planning/planning-policy/evidence-base/current-evidence/">https://www.midsuffolk.gov.uk/planning/planning-policy/evidence-base/current-evidence/</a>

## (Reg 18) Summary of the main issues raised during the 2017 Draft JLP consultation and how they have been taken into account

#### **Housing**

Topic	Main issues raised during consultation (2017)	How this has been taken into account in next document iteration
Housing Requirement	Housing targets are too high and need reducing to achievable levels.	The SHMA has been robustly produced in accordance with the relevant Government
	The Strategic Housing Market Assessment (SHMA) is not robust and over/under estimates housing requirements.	guidance for identifying housing needs. However, the new NPPF (2019) has changed the way in which Local Planning Authorities calculate their overall housing requirements. The Draft JLP has been amended to incorporate the new methodology for calculating housing need, resulting in an overall housing requirement of 420 dwellings per annum in Babergh and 556 dwellings per annum in Mid Suffolk.
Contingency Buffer	A contingency buffer was widely supported, with a range of suggestions ranging from 5% and 50% above housing requirements.	The Draft JLP proposes a 20% buffer in both Districts to aid with the delivery of housing. Too low a figure would not allow enough flexibility for schemes which fail to materialise, and too high a figure could lead to the over delivery of housing which

Topic	Main issues raised during consultation (2017)	How this has been taken into account in next document iteration
		may have implications on infrastructure capacity.
Spatial Distribution	Four broad options for the spatial distribution of development were put forward as part of the 2017 Consultation. All four broad options had a significant range of comments made against them (both positive and negative). Some specific large SHELAA sites or suggestions of broad new locations of new settlements were submitted.	Draft Joint Local plan proposes a spatial distribution which combines a market town/rural area balance and a transport corridor focus (B/MHD2 & B/MHD3 in Consultation Document). The balance between market town/rural area and a transport corridor focus emphasises securing delivery as this is where there is most market demand. New settlement proposals are considered more realistic in a plan review.
Settlement Hierarchy	A number of comments were received which stated that settlements were incorrectly categorised, predominantly as a result of inaccurate scoring of services and facilities within those settlements. Additional criteria were proposed during the consultation.	As a result of the comments received, the settlement hierarchy has been reviewed and a new version has been included within the Draft JLP. Further criteria were not included as this would have little impact on identifying the sustainability of settlements.
Rural Growth	Overall the greatest support was for taking forward an allocation led approach with provision for development in hamlets. The greatest emphasis in the comments set out the need for certainty, clarity and for growth to be proportional with acceptable impacts.	The Draft JLP proposes allocations in Ipswich Fringe Settlements, Market Towns and Urban Areas and Core Villages. Settlement boundary expansions will provide growth in Hinterland and Hamlet Villages. Further clarity added to 'Hamlets and Clusters of development in the Countryside' policy.

Topic	Main issues raised during consultation (2017)	How this has been taken into account in next document iteration
Self-build and custom build housing	Generally, there was support for encouraging self-build and custom build dwellings across the Districts.	The Draft JLP includes a self-build policy.
Affordable housing	Concerns were raised that the SHMA does not accurately measure affordable housing needs in the Districts.	The SHMA has been robustly produced in accordance with the relevant Government guidance. Due to the changes in overall housing requirements a partial update to the SHMA has been produced.
	Options put forward during the consultation for affordable housing provision ranged from 20% to 50%.	Draft JLP proposes an affordable housing target of 35% which takes into account sites that do not provide affordable housing (e.g. for viability reasons or too small a site) and the viability/deliverability of sites.
		The alternative of reducing the on site requirement below 35% would not meat OAN.
		Increasing the target beyond 35% is not considered realistic. Based on delivery data and historic trends 35% is considered the optimum level for an on-site affordable housing contribution.
		35% affordable housing provision has been viability tested.

Topic	Main issues raised during consultation (2017)	How this has been taken into account in next document iteration
Affordable Housing Continued	There was <u>not</u> an overwhelming preference for prioritising either affordable housing or infrastructure provision where viability is an issue.	As there was no overwhelming difference in levels of support for either prioritising affordable housing or infrastructure provision, it is deemed appropriate to deal with such issues on a case-by-case basis.
	Comments were generally split between providing a preference to key workers and not.	No preference will be given to key workers in affordable housing within the Draft JLP.
Rural Exception Sites	A range of on-site market provision between 5% and 80% were suggested.	The Draft JLP proposes an allowance of 35% market housing on rural exception sites. If levels were set any higher this would lessen the opportunity to provide for affordable housing on the site.
Housing Mix and Type	A large number of responses were received with an over- arching support for bungalows and accessible housing in- line with the findings in the SHMA.	The Draft JLP proposes that the mix, type and size of new housing development will be expected to reflect established needs in the most relevant district needs assessment.
	Concerns were raised that requiring a proportion of bungalows and/or accessible dwellings would be overly restrictive and against market forces.	This is noted, however with the aging demographics of each District expected to continue there is a need to address specific requirements. Draft policies have been viability tested.

Topic	Main issues raised during consultation (2017)	How this has been taken into account in next document iteration
Gypsies and Travellers	There was a limited response this topic. There was not a strong preference to either allocating standalone Gypsies and Traveller site(s) or allocating as part of larger residential developments.	The current assessment has shown that there is little to no requirement for additional sites within Babergh and Mid Suffolk therefore to allocate sites as part of residential allocations would be considered disproportionate to meet current need. Criteria based policy proposed in the Draft JLP.
Mooring Provision	Wide acknowledgement that greater management is required with regards to existing and potential future moorings at Pin Mill, Chelmondiston. This management extends beyond Babergh District Council. Request for a robust policy to control inappropriate moorings.	Houseboat Policy has been included in the Draft JLP.

## **Economy**

Topic	Main issues raised during consultation (2017)	How this has been taken into account in next document iteration
Economic Needs	Concerns were raised over the accuracy of employment needs forecasts claiming that future uncertainty will limit the demand for employment land.	Forecasts are based on projections and do not take into account future uncertainty or future interventions which could impact on future demand. Could be reviewed at a later plan review.
Allocating employment land to meet needs to allocate over and above	The JLP should be aspirational and support business expansion and development. However, others felt that the focus should be on the suitability of the land and managing the risk of change of use from employment to residential use which could be increased by over allocating land.	In accordance with the NPPF the Draft JLP supports and encourages sustainable economic growth seeking to ensure a continuous range and diversity of sites and premises which are fit for purpose are

Topic	Main issues raised during consultation (2017)	How this has been taken into account in next document iteration
		available across the Districts. Policy also provides criteria for the delivery of new employment sites.
Retaining Employment Land	Land should not be allocated in perpetuity.	Draft JLP policies generally seek to protect employment land. However, policies set out the circumstances in which employment land may be considered suitable for redevelopment into other uses.
Retail	Limited representations were received. Representations that were received varied with thresholds for Retail Impact Assessment ranging from 200m2 to 2,500m2. Comments suggested amendments to Primary and Secondary Shopping Frontages.	Babergh and Mid Suffolk Town Centre and Retail Study (2015) sets recommendations to be implemented through the Draft JLP.

### **Environment**

Topic	Main issues raised during consultation (2017)	How this has been taken into account in next document iteration
Biodiversity	Responses received largely acknowledged the need to protect biodiversity but with a strong desire to widen the criteria of the approaches taken.	Draft JLP policy seeks to protect species and habitats but also seek enhancements for the network of habitats and biodiversity where appropriate.
Flood Risk	Limited responses were received (however some site-specific comments were made which are addressed in the place section).	Flood Risk policy within the Draft JLP seeks to limit the flood risk of development in accordance with the NPPF and local circumstances. The site allocation process in the Draft JLP steers development away from areas at the highest risk of flooding.

Topic	Main issues raised during consultation (2017)	How this has been taken into account in next document iteration
Renewable Energy	Limited responses were received. There was an over- arching support for a renewable energy policy. Some representations provided additional measures that could be considered for inclusion. Concerns were raised that the requirement could deem development to be unviable.	The Draft JLP supports renewable energy and includes criteria related specific impacts which will actively support the delivery of renewable technologies appropriate for the area, on a case by case basis. Whole plan viability testing has been conducted.
Building Sustainability	Over-arching views are supportive of building sustainably with a number of comments providing additional sustainability measures. Anglian Water considered there is sufficient evidence to support water efficiency measures.	The Draft JLP proposes water efficiency measures (110 litres per person per day).
Landscape	Concerns were raised that there is a lack of robust evidence to substantiate removal of locally designated landscape areas.	Joint Babergh and Mid Suffolk Landscape Character Assessment (Aug 2015) identifies the specific landscape and settlement characteristics within the Districts. Furthermore, Landscape Fringes of Ipswich — Settlement Sensitivity Assessment (July 2018) produced after the consultation provides a robust analysis of the sensitivity of settlement fringes to development. Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment (March 2018) produced after the consultation. This document provides an analysis of the historic characteristics of the landscape.
Minimum space standards	Generally, there was support for including national space standards in the Draft JLP. Concerns were raised that	Minimum space standards to be included within the Draft JLP and have been
Statiualus	space standards would impact on viability and delivery.	viability tested.

Topic	Main issues raised during consultation (2017)	How this has been taken into account in next document iteration
Design Policies	Generally, there was support for improving the design quality of developments across both Districts, with support for reviewing and updating the Suffolk Design Guidance and stronger design policies.	incorporating the desire to improve the

#### **Communities**

<u>Communico</u>		
Topic	Main issues raised during consultation (2017)	How this has been taken into account in next document iteration
Open Space Provision	<ul> <li>Generally, there was support for the following options:</li> <li>Requiring open space provision for non-residential uses of 1ha or more;</li> <li>Open space requirements related to identified needs;</li> <li>Protect open spaces unless assessment shows it is surplus, or the equivalent or better provision would result from the development and recognising the local distinctiveness of open spaces.</li> <li>Viability concerns were raised.</li> </ul>	Incorporated within the Draft JLP policies, which have been viability tested.
Local Green Space	Numerous spaces were proposed as Local Green Spaces.	Local Green Spaces are not proposed in the Plan. The Open Space Assessment (2019) provides the evidence base for generally protecting established open spaces. If local communities wish to designate Local Green Spaces this can be achieved through Neighbourhood Plans using the tests of the NPPF.

## Babergh & Mid Suffolk Joint Local Plan Consultation Statement (March 2021)

Topic	Main issues raised during consultation (2017)	How this has been taken into account in
		next document iteration
Protection and	Generally, there was support for inclusion for a policy for	A list of community facilities to be
<b>Provision of Community</b>	the protection and provision of community facilities.	protected is included within the Draft JLP.
Facilities	Concerns were raised that a criteria-based policy could	Draft JLP policy includes a consideration
	result in the loss of community facilities, and the relocation	of the traffic and accessibility impacts and
	of facilities could have traffic and travel impacts. A number	requires evidence that the facility is not
	of community facilities were proposed to be included within	viable either in its current or future form.
	this policy.	

### <u>Infrastructure</u>

Topic	Main issues raised during consultation	How this has been taken into account in
		next document iteration
Strategic Infrastructure	There was widespread support for a strategic	Strategic infrastructure policy has been
Policy	infrastructure policy to manage infrastructure, particularly	included within the Draft JLP. The
	as this would address issues of cumulative growth.	Councils have produced an Infrastructure
		Delivery Programme (IDP) which provides
		evidence for the Draft JLP. This has been
		produced in consultation with relevant
		infrastructure providers.

#### **Place Section Comments (2017)**

10. The Babergh and Mid Suffolk Joint Local Plan: Consultation Document (August 2017) sought the views on the suitability of 'potential development sites' identified in the Draft Strategic Housing and Economic Land Availability Assessment (SHELAA) (2017) and proposed settlement boundaries.

Summary of the issue	Settlements Affected		How this issue has been taken into account in next document iteration
The impact of development on the following infrastructure:  • Highways safety and capacity; • Primary and secondary school capacity; • Healthcare capacity; • Utilities capacity (gas/water/electricity/sewage); • Emergency services; and • Waste capacity.	<ul> <li>Aldham;</li> <li>Bacton;</li> <li>Belstead;</li> <li>Bentley;</li> <li>Beyton;</li> <li>Bildeston;</li> <li>Botesdale &amp; Rickinghall;</li> <li>Boxford;</li> <li>Brantham;</li> <li>Bramford;</li> <li>Chelmondiston;</li> <li>Claydon/Barham;</li> <li>Cockfield;</li> <li>Copdock and Washbrook;</li> <li>East Bergholt;</li> <li>Finningham;</li> <li>Great Blakenham</li> <li>Great Waldingfield;</li> <li>Glemsford;</li> <li>Hadleigh;</li> </ul>	<ul> <li>Holbrook;</li> <li>Hunston;</li> <li>Kenton;</li> <li>Leavenheath;</li> <li>Little Waldingfield;</li> <li>Long Thurlow</li> <li>Metfield;</li> <li>Needham Market;</li> <li>Redgrave;</li> <li>Shimpling;</li> <li>Sproughton;</li> <li>Stutton;</li> <li>Sudbury;</li> <li>Thorndon;</li> <li>Wetherden;</li> <li>Woolpit;</li> <li>Wolverstone;</li> <li>Worlingworth;</li> <li>Yaxley;</li> </ul>	Infrastructure Delivery Plan (IDP) and consultation with relevant service providers have informed the Draft JLP. Where applicable mitigation measures are proposed within draft site allocations. The spatial distribution of growth considers the infrastructure capacity of settlements and the opportunities to provide new infrastructure provision.

Summary of the issue	Settlements Affecte	ed		How this issue has been taken into account in next document iteration
Potential impact of development on heritage assets including conservation areas.	Aldham; Acton; Badwell Ash; Bacton; Barham; Barking; Belstead; Bentley; Beyton; Bildeston; Botesdale & Rickinghall; Brantham; Bures St Mary; Capel St Mary; Claydon Cockfield; Copdock & Washbrook; Cotton; Creeting St Peter; Drinkstone; Earl Stonham; East Bergholt; Elmsett; Eye; Finningham; Fressingfield; Gislingham;	Great Blakenham Great Finborough Great Waldingfied; Glemsford; Harleston; Henley; Hessett; Hinderclay; Hitcham; Holbrook; Hoxne; Hunston; Lavenham; Laxfield; Lindsey; Little Waldingfield; Long Melford; Long Thurlow; Mellis; Metfield; Mendham; Needham Market; Occold; Old Newton; Onehouse; Preston St Mary; Raydon; Redgrave; Shimpling; Shotley;	Somersham; Sproughton; Stanstead; Stoke by Nayland; Stonham Parva; Stowmarket; Stowupland; Stradbroke; Stutton; Sudbury; Thorndon; Tostock; Walsham-le-Willows; Wattisfield; Wenham Magna; Wetheringsett-Cum- Brockford; Weybread; Whatfield; Wherstead; Wilby; Wortham; Worlingworth; Wolverstone; Yaxley.	Potential heritage impacts highlighted in the relevant SHELAA site assessments. Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment (March 2018) produced after the consultation which provides part of the evidence base for the Draft JLP. The reassessment of sites using this new evidence has resulted in the removal of some SHELAA sites. Where applicable mitigation measures are included in draft Joint Local Plan allocations.

Summary of the issue	Settlements Affected	How this issue has been taken into account in next document iteration
Development would be disproportionate to the existing settlement and/or there is no requirement locally for housing/employment land.	<ul> <li>Acton;</li> <li>Bentley;</li> <li>Botesdale and Rickinghall;</li> <li>Cockfield;</li> <li>Glemsford;</li> <li>Great Ashfield;</li> <li>Holton St Mary;</li> <li>Kenton;</li> <li>Leavenheath;</li> <li>Little Waldingfield</li> <li>Shimpling;</li> <li>Sproughton;</li> <li>Redgrave;</li> <li>Woolverstone;</li> <li>Worlingworth;</li> <li>Wyverstone.</li> </ul>	SHELAA is a technical assessment of the potential suitability of sites. Draft JLP allocations and settlement boundary expansions include considerations of District wide housing and employment needs, spatial distribution, settlement hierarchy, environmental and physical constrains, infrastructure capacity and existing planning commitments.
Lack of services and facilities to accommodate growth	<ul> <li>Bentley;</li> <li>Cockfield;</li> <li>Copdock and</li> <li>Washbrook;</li> <li>Gislingham;</li> <li>Glemsford;</li> <li>Great Ashfield;</li> <li>Kenton;</li> <li>Little Waldingfield</li> <li>Redgrave;</li> <li>Woolverstone;</li> <li>Worlingworth;</li> <li>Wyverstone</li> <li>Yaxley</li> </ul>	d; Audit of services and facilities conducted as part of the draft JLP Settlement Hierarchy Review. The settlement hierarchy is part of the consideration in forming the broad locations for growth in the Draft JLP.

Summary of the issue	Settlements Affected		How this issue has been taken into account in next document iteration
Biodiversity and/or Ecological impact of development.	<ul> <li>Bacton;</li> <li>Botesdale &amp; Rickinghall;</li> <li>Capel St Mary;</li> <li>Chelmondiston;</li> <li>Claydon/Barham;</li> <li>Cockfield;</li> <li>Copdock and Washbrook;</li> <li>Great Waldingfield;</li> </ul>	<ul> <li>Hadleigh</li> <li>Holbrook;</li> <li>Kenton;</li> <li>Leavenheath;</li> <li>Long Melford;</li> <li>Stowmarket;</li> <li>Woolpit;</li> <li>Woolverstone;</li> <li>Yaxley.</li> </ul>	The potential impact on biodiversity/ecology has been noted in the relevant SHELAA site assessments. Draft JLP policies to address these concerns.
Landscape impact of development	<ul> <li>Bentley;</li> <li>Claydon/Barham;</li> <li>Copdock and Washbrook;</li> </ul>	<ul><li>Little Waldingfield;</li><li>Sproughton;</li><li>Woolverstone;</li></ul>	Settlement Sensitivity Assessment - Landscape Fringes of Ipswich (July 2018) produced after the consultation to inform the Draft JLP.
Impact of development on Area of Outstanding Natural Beauty (AONB)	Chelmondiston;     Holbrook;	<ul> <li>Stoke by Nayland;</li> <li>Wherstead;</li> <li>Woolverstone;</li> </ul>	Relevant SHELAA sites have identified the potential impact upon AONB's. Where sites are allocated within or in close proximity to the AONB the Draft JLP site allocation policies require the potential impact to be mitigated. Planning applications would be required to include mitigation measures.

Summary of the issue	Settlements Affected		How this issue has been taken into account in next document iteration
Development proposed in areas at risk of flooding.	<ul> <li>Cockfield;</li> <li>Copdock and Washbrook;</li> <li>Kenton;</li> <li>Needham Market;</li> </ul>	<ul> <li>Stowmarket;</li> <li>Worlingworth;</li> <li>Yaxley.</li> </ul>	The SHELAA/Draft JLP seeks to avoid identified areas of flood risk. Further evidence can be assessed to review is flood mitigation work is required.
Amendments to settlement boundaries were proposed including the removal of settlement boundaries, creation of new settlement boundaries and changes to proposed settlement boundaries	<ul> <li>Acton – Newman's Green;</li> <li>Bacton;</li> <li>Badwell Ash – Long Thurlow;</li> <li>Bedfield – Little Green/Long Green</li> <li>Bildeston;</li> <li>Brantham;</li> <li>Brundish;</li> <li>Burgate;</li> <li>Burstall;</li> <li>Chilton;</li> <li>Combs – Moat Tye</li> <li>Copdock and Washbrook;</li> <li>Cotton;</li> <li>East Bergholt;</li> <li>Elmswell;</li> <li>Eye;</li> <li>Framsden;</li> </ul>	<ul> <li>Hoxne;</li> <li>Lawshall;</li> <li>Lindsey</li> <li>Little Cornard;</li> <li>Mendlesham Green</li> <li>Nedging with Naughton;</li> <li>Needham Market;</li> <li>Norton;</li> <li>Old Newton;</li> <li>Palgrave;</li> <li>Pinewood;</li> <li>Raydon;</li> <li>Redlingfield;</li> <li>Shimpling Street;</li> <li>Somerton;</li> <li>Sproughton;</li> <li>Stonham Earl;</li> <li>Stowmarket;</li> <li>Stowupland;</li> </ul>	Where settlements of 10 or more well related dwellings which are fronting a public highway, have been identified through the consultation process they have been provided with a settlement boundary in the Draft JLP Preferred Options (July 2019). Settlement boundaries have been created using a consistent approach across the Districts, to meet the development needs of the Districts across the plan period. Draft allocations are included within the settlement boundaries

## Babergh & Mid Suffolk Joint Local Plan Consultation Statement (March 2021)

Summary of the issue	Settlements Affected		How this issue has been taken into account in next document iteration
	<ul> <li>Fressingfield;</li> <li>Gedding;</li> <li>Great Ashfield;</li> <li>Great Cornard;</li> <li>Great Finborough;</li> <li>Hadleigh;</li> <li>Harkstead;</li> <li>Haughley;</li> <li>Haughley New Street;</li> <li>Haughley Green;</li> <li>Hemingstone;</li> <li>Holbrook;</li> <li>Holton St Mary;</li> </ul>	<ul> <li>Stradbroke;</li> <li>Stutton;</li> <li>Sudbury;</li> <li>Thorndon;</li> <li>Thurston;</li> <li>Westhorpe;</li> <li>Wetheringsett-cum-Brockford;</li> <li>Wickham Skeith;</li> <li>Wickahm Street;</li> <li>Wortham;</li> <li>Woolpit;</li> <li>Woolverstone;</li> </ul>	proposed in the Draft JLP Preferred Options (July 2019).

#### Babergh and Mid Suffolk Joint Local Plan – Preferred Options (Regulation 18) July 2019

- 11. From 22<sup>nd</sup> July to 4pm on Monday 30<sup>th</sup> September 2019 the Councils consulted on the Babergh and Mid Suffolk Joint Local Plan – Preferred Options (Regulation 18) (July 2019)<sup>3</sup>.
- 12. During the consultation, the Joint Local Plan and comment forms were made available at libraries within the Districts. Paper copies of the Joint Local Plan were made available at the Councils head office, and Customer Access Points in Stowmarket and Sudbury. Additionally, copies of the Sustainability Appraisal, Joint Local Plan and comment forms were made available at the Council head-office. Hard copies of the Joint Local Plan Consultation Document were provided to all Town and Parish Councils within the Districts.
- 13. Twenty public drop in events were held in the District's during the consultation period which allowed communities to find out more about the Joint Local Plan and speak to Council officers and some members of the Council. Approximately 900 people attended the events. Additionally, all Town and Parish Councils within the Districts were invited to attend briefing sessions with Council officers.
- 14. The Councils accepted representations via an online consultation portal, by email and by letter either by post or hand delivered to the Council offices. A total of 4404 representations were received during the consultation from 1050 respondents. The Sustainability Appraisal and Appropriate Assessment received a total of 33 representations from 25 respondents. 21% of representations were made using the Councils Joint Local Plan consultation portal (online), 53% were made via email and 27% were made by letter (note: percentages do not equal 100% due to the rounding of figures). Appendix 1 of this Consultation Statement sets out who was invited to make representations and Appendix 2 of this Consultation Statement sets out how they were invited to make representations.
- 15. Responses to comments received for the Sustainability Appraisal (SA) and Appropriate Assessment (July 2019) are set out in Appendix A of the Joint Local Plan SA Scoping Report (March 2020)<sup>4</sup>. A separate consultation for the Babergh and Mid Suffolk Joint Local Plan SA Scoping Report took place between 18th March 2020 and 12 noon on Friday 24th April 2020, and a response to comments made during this consultation is located within the Babergh & Mid Suffolk SA Report.

<sup>&</sup>lt;sup>3</sup> Document B09 in the Core Document Library

<sup>&</sup>lt;sup>4</sup> https://baberghmidsuffolk.oc2.uk/docfiles/13/BMSDC%20SA%20Scoping%20Report.pdf

## (Reg 18) Summary of the main issues raised during the 2019 Draft JLP consultation and how they have been taken into account

#### **Strategic Policies (SP01 to SP10)**

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next
SP01 – Housing Requirement	General support/acceptance for housing requirement, noting that the Government's standard method is used. Objections included:  • Set higher number to prevent constraining the economy;  • Imbalance between jobs and number of homes;  • Should be based on accurate assessment not faulty projections.  • Housing figure should be combined to set a clear joint strategy.  • Unclear if figures are underpinned by evidence base assessments on heritage impact.	Housing requirement has been calculated using the standard method set out in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG). No evidence that housing requirement should be set at any other level. Since the 2019 consultation the housing requirement has been updated to reflect the most up to date affordability ratios published in March 2020. NPPG allows for different housing numbers to be attributed to LPAs within their plans. As a result of comments received during the 2019 consultation, a Heritage Study has been produced for the Councils.
	Mixture of support and objection to the Draft JLP identifying a buffer of approximately 20% in the supply of new land.	A supply buffer in land identified for housing will assist the Councils in maintaining delivery of planned targets and provide greater certainty and control on the location of development. The lower the buffer the greater the risk of delivery falling below planned targets, unplanned growth and the impact of any future housing target increases.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
	Consideration needs to be given to housing need arising from neighbouring authorities - namely Ipswich Borough Council.	The Council is working with neighbouring local planning authorities. No unmet housing need has been formally identified by any neighbouring planning authority for the Council to consider.
SP02 - Affordable Housing	Concern that the requirement for 35% affordable housing is not evidenced as the Strategic Housing Market Assessment (SHMA) identifies a lower need in both Districts.	Since the 2019 consultation, the Councils have conducted further work on the amount of affordable housing provided by schemes in the Districts (taking into account those that are not required to provide affordable housing). This demonstrates that a 35% requirement is needed to achieve the overall affordable housing needs of the Districts over the plan period.
	Viability study does not make accurate assumptions.	The Councils viability study is considered robust and has assessed all policies within the plan and used a typology-based approach to assess development sites. Ongoing viability work is iterative with Plan production.
	Priority should be given to those with an existing connection to the settlement.	The Council is mindful of those with a local connection when considering housing need, however the overall district need figure is usually applied through the Gateway to Homechoice system. Where a scheme is specifically provided to address local housing needs such as a Rural Exception site or Community-led housing then a more localised approach is taken.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
SP03 – Settlement Hierarchy	All development sites should be properly identified on the policies maps with an associated dwelling number.	In response to comments received all proposed new sites are clearly identified in the Draft JLP with an associated dwelling number.
	Reference should be made to the historic environment and criterion in Part D of the policy should apply to all settlement types.	Consideration of historic environment has been added and part D now applies to all settlements with a settlement boundary.
	Some communities supported the inclusion of considering the cumulative impact of development. Some objected believing it creates delay and needs to be tightly defined.	Policy requirement is considered appropriate and allows for planning judgement to be applied. Tight definition may lead to an overly rigid approach which would not be compatible with the NPPF.
	Objections received to the classification of hamlets, as they are remote from services and facilities. Unsustainable to allow for development in these settlements – should remove Hamlets category and leave to policy LP01.	Settlement hierarchy recognises the more limited provision of services/facilities in these areas. Some smaller settlements have previously expressed a desire for a limited amount of development to help meet housing need and sustain rural communities.
	Strategic gaps or green buffers should be included to avoid the coalescence of settlements.	Policy has been amended to avoid the coalescence of settlements.
	Comments received regarding the incorrect scoring of services and facilities and its implications on the settlement hierarchy. Many responses argued for settlements to be reassigned up and down the hierarchy categories. Point system is crude and overly simplistic.	All comments have been reviewed and where factual errors have been highlighted (i.e. incorrect scoring of facilities) amendments have been made to the new settlement hierarchy which is included in the Draft JLP. Points system is used to create a simple and transparent methodology to indicate the broad and relative sustainability of settlements.
	Some comments received requesting that development should only be allowed within settlement boundaries.	Current Babergh Policy CS11 allows for development outside of settlement boundaries subject to criteria, which has received criticism

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
SP03 – Settlement Hierarchy continued.	Whereas others believed edge of settlement or development outside of settlement boundaries should be supported.	from communities and developers as it lacks certainty. Instead, the Draft JLP seeks to take forward an allocations led plan. Settlement boundaries have been drawn to meet the development needs of the plan. Development outside of settlement boundaries, cannot be automatically prohibited, but will be beyond the plan requirement and judged on their own merits.
SP04 – Spatial Distribution (comments relating to individual	Need greater transparency as to how the minimum Neighbourhood Plan (NP) numbers have been generated.	Spatial Distribution chapter has been amended to include a breakdown of the NP housing numbers to include the number of outstanding planning permissions and 'new growth' allocated through the Draft JLP.
settlements are addressed separately)	Growth needs to be spread over more settlements across the hierarchy. Greater emphasis should be put on a new settlement in this plan. Housing should be located near employment land.	The Draft JLP seeks to ensure a balanced distribution pattern of growth, where growth is aligned to infrastructure, services and employment but also provides appropriate opportunity to enhance and maintain vitality in rural communities. New settlement is one of the broad spatial distribution options tested, but is challenging due to long lead in and delivery times. Potential locations also perform poorly against the key criteria published in the Draft JLP. Broad alignment between spatial distribution of housing (SP04) and identified employment land (SP05).

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
SP04 – Spatial Distribution continued.	The capacity for the distribution of growth needs to be informed by evidence assessing landscape character and impacts on heritage assets.	As a result of comments received during the 2019 consultation, heritage and landscape studies have been produced, which are used to inform the distribution of growth.
	The Sustainability Appraisal (SA) does not contain robust alternative options assessment of varying growth levels in Core Villages. The approach to sites selection is not robust and Sustainability Appraisal (SA) is not a thorough assessment of sites and alternatives	Policies, spatial distribution, proposed development sites and reasonable alternative options were considered in the SA. An updated SA has been produced alongside this iteration of the Draft JLP.
	Windfall estimates have been underestimated and should be increased.	Windfall rates have been particularly high in recent years due to a lack of development plan document site allocations. The Draft JLP, identifies the land requirements to meet the identified housing needs for the area. Windfall development can realistically be expected to continue where in accordance with Draft JLP policies, but would be expected to be reduced. A reasonable windfall allowance of 500 dwellings per district has been made, but the emphasis is on identified allocated sites.
	The sites put forward in the Draft JLP must be deliverable. Too much reliance is placed on outstanding planning permissions, many of which have stalled.	The Council has had regard to deliverability when identifying sites in the Draft JLP. The Infrastructure Delivery Plan identifies the relevant infrastructure needed to support growth and the funding sources. The Council also has an adopted Housing Delivery Test Action Plan to ensure that sites are progressed and delivered.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
SP04 – Spatial Distribution	The Draft JLP needs to include a housing trajectory to clearly set out expected deliverable and developable sites.	Noted. A housing trajectory is available for the next document iteration.
continued.	Need to work with IBC and SCC on sites around the Ipswich Fringe to ensure infrastructure is brought forward appropriately.	Cross boundary spatial planning is conducted through the duty to cooperate arrangements and the Ipswich Strategic Planning Area (ISPA) Board
SP05 – Employment Land	The strategy is insufficient and does not meet the JLP's stated economic objectives. Fails to identify new employment sites and fails to plan positively for economic growth. Policy should identify specific sites, rather than just support strategic locations along corridors.	Policy sets a flexible approach allowing the districts to positively respond to investment opportunities along the key strategic transport routes. No quantitative need to allocate sites and doing so could undermine existing sites. Policy seeks to prevent diversion of investment from existing sites and/ or minimise the loss of existing sites to other uses due to the current employment land supply position.
	Objections to policy requiring that if sites are to be redeveloped for alternative non-employment uses, provide alternative provision through either a "land swap" and / or contributions to enable alternative employment provision must be secured.  Policy should restrict new employment sites in Hamlet villages and/or in the countryside, even within the strategic corridors. Large scale employment growth is not suitable in rural areas due to highways impact of traffic / HGV movements. Lack of accessibility to employment areas in the Districts. Alternatively, there was some support for small scale employment allocations in rural areas.	Aim of the requirement is to support ongoing employment provision in line with the plan's objectives, for example contributions may help support delivery of infrastructure facilities on other local sites for small businesses.  Policy amended to include consideration of highway capacity and settlement hierarchy. Policy supports the economy whilst taking account of the sensitivity of smaller settlements, particularly with regard to transport impacts and the scale of development without unduly restricting opportunities for rural small businesses which are a critical part of the districts economy.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
SP05 – Employment Land continued.	Some support for employment growth in Sudbury and surrounding parishes. Support was given to the proposed deallocation of the employment site.  (Objection was received that the site was not proposed for residential).	Area is identified as a strategic location for employment use.
	Eye Airfield should require 'high quality' employment.	'high quality' is subjective and policy needs to focus on land use.
	Capel St Mary is an area accommodating significant housing growth, but policy does not state it is a strategic employment location.	The strategic employment locations are based on existing sites and concentrations of businesses. However, the second part of the policy makes provision for new sites at strategic locations (including reference to the A12 corridor) subject to criteria being met. This could include proposals on the Capel St Mary area.
	Policy should state that The Bull Lane and Acton Place Industrial Estates should only be permitted to expand in the direction of the A134 and any permitted expansion shall not result in increased HGV traffic through the village of Acton.	Policy supports the expansion in principle of Strategic Employment Sites. Highways impact would be considered in accordance with the relevant Draft JLP policies.
SP06 - Retail and Town Centre Use (previously Retail and Leisure)	No evidence. No strategy on issues such as access to retail and leisure and no identification of strategic retail/leisure opportunities. Ignores all recent reports on town centre viability, including residential development options and accessibility.	Policy is open to support all forms of retail and leisure that meets the criteria, where appropriate. Policy is evidenced from 2015 Retail Study. Further detail is added in the relevant Draft JLP policies.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
SP07 - Tourism	Should support tourism in all parts of district not just historic settlements. Policy should safeguard existing tourism and leisure facilities and any proposed development that has a negative impact on the tourism and leisure facilities should be resisted. No real or specific proposals to pro-actively boost tourism.	Policy has been amended to provide clarity that it applies to the whole district. Policy seeks to maintain existing facilities, but remains open to support all forms of tourism where appropriate.
SP08 – Strategic Infrastructure Provision	Highways – need for more joined up approach with highway infrastructure, services and facilities.	Policy wording has been reviewed and provision is made to enable this through policy mechanisms, including IDP. The issue is considered to be of prioritisation of issues, delivery and the sequencing and timing of implementation.
	<ul> <li>Reference should be made to the following:</li> <li>Green infrastructure;</li> <li>National and local environmental designations;</li> <li>Requirements of business infrastructure, including agricultural businesses;</li> </ul>	Amendments made to supporting text to state that types of infrastructure are wide ranging, and link to the IDP.
SP09 – Enhancement and Management of the Environment	Strategic policy for protection of the environment should protect the whole environment and not be confined to the cross-boundary mitigation of protected habitats sites. Does not take into account Stowmarket Area Action Plan, Suffolk Nature Strategy or Suffolk Biodiversity Action Plan.  Stronger wording required in ensuring that contributions are	Policy has been amended to incorporate a wider consideration of the environment, whilst retaining high protection of designated sites. Cross-boundary issues are also addressed in the Duty to cooperate.  Term where relevant has been removed from
(previously SP09 Cross-boundary mitigation of effects on Protected Habitats Sites)	secured within identified zones, in accordance with the strategy. Needs to consider cumulative impact.	policy. Development requirements needs to be compliant with the Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) which takes into consideration cumulative impact of development.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
SP10 – Climate Change	Needs to be strengthened and more explicit and detailed. No in-depth Key Evidence document addressing impact and consequent measures in South Suffolk. Need to recognise that both councils are working towards a zero carbon / carbon neutral future by 2030.	Policy sets out sufficient detail for a Strategic Policy. Further detail is set out in the relevant part 2 policies of the Draft JLP. Recognition of councils work towards a zero carbon / carbon neutral future is provided.
	Not clear what a "sequential risk-based approach" in the context of future proofing for climate change means.	Policy has been amended to clarify that in this context the sequential approach applies to flood risk.

## **Local Policies (LP01 to LP35)**

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP01 – Windfall development in hamlets and dwellings clusters (Previously titled – Hamlets and Clusters of Development in the Countryside)	development in hamlets and clusters and restricting scale of development to a single dwellings or pair of semi-detached dwellings. However, some felt that it	Policy seeks to respond to some small rural communities appetite for limited growth opportunity. The purpose of the policy is to provide limited flexibility over the Plan lifetime where small growth could bring social and economic benefits without compromising the integrity of the rural areas.
LP02 - Residential Annexes	A few comments were made to clarify material consideration issues; such as reference to light, amenity, noise, privacy, visual impact and overbearing out of scale or out of character designs, design, size, scale, mass and materials.	Part 3 of the policy is considered a necessary and relevant policy component. Interlinks are provided with other relevant policies of the Draft JLP which would need to be considered for such a proposal.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP03 – Residential Extensions and Conversions	Consideration should be given to heritage impact, highways and parking standards. Should be required to enhance the buildings sustainability.	It is considered that requiring the building as a whole to be more sustainable is too restrictive. Heritage impact, highways and parking considerations have been added to the policy.
LP04 – Replacement Dwellings in the Countryside	Comments received stated a need for good quality design and consideration of heritage impacts.	This has been added to the policy, and other relevant policies of the Draft JLP will apply.
LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Plots within Settlement Boundaries	Concerns raised over inappropriate infilling and 'back-land' development. Heritage and biodiversity concerns.	Policy amended to require that proposals would not be out of keeping with existing context and heritage impact considered. Biodiversity concerns addressed by the relevant Draft JLP policies.
LP06 – Scheme Composition (previously part of LP06 Supported and Special Housing)	Insufficient evidence/justification to demonstrate that 50% of all dwellings should meet Part M4(2) standards, and 3% of dwellings should be bungalows.	The SHMA identifies an aging population profile in the area and significant households with disability needs. Requirement of a set percentage of bungalows has been removed, instead applications will be expected to reflect the mix and type (including bungalows) identified in the most relevant district needs assessment.
LP07 - Supported and Special Needs Housing (previously part of LP06 Supported and Special Housing)	Confusion over whether policy is for specialist/supported needs or all dwellings.	Concern noted and to aid with clarity the policy has now been split into two policies LP06 – Scheme Composition and LP07 – Supported and Special Needs Housing.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP08 – Affordable Housing (previously LP07 – Affordable Housing)	Concerns raised over the mix of tenures and size of affordable housing. (i.e. not enough small homes).	Proposed mix is based on the Strategic Housing Market Assessment (SHMA) which is the most up-to-date evidence available to the Councils. The Draft JLP policies are flexible if new robust evidence is produced after adoption and this can be taken into account.
LP09 – Provision for Gypsy and Traveller and Travelling Showpeople (previously LP08 – Provision for Gypsy and Traveller and Travelling Showpeople)	Comment received stating that there was an oversupply of pitches. Alternative, a was comment received stating that more provision should be made.	Policy is evidenced by the Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment (May 2017) and monitoring of planning applications.
LP10 – Moorings, Marinas and Houseboats (previously LP09 – Moorings and Marinas)	Concerns raised that policy fails to distinguish between houseboats at Pin Mill and the commercial and club-based marinas and related onshore facilities. Concerns raised over water quality and sewage treatment.	Policy has been amended to set appropriate criterion for all marina areas. Policy requires there to be no risk of deterioration in Water Framework Directive Status.
	Policy is unsound and legally noncompliant as land is not owned by Babergh DC.	The policy has evolved from adopted planning policies and only covers circumstances where planning permission is required.

	in next document iteration
Policy should allocate sites for self and custom build, or criteria should be used for identifying appropriate sites.	The Councils have done further work on the scale of self build needs in the district areas. The scale of self build completions (measured by CIL exemptions) far exceeds the number identified on the Register. The Council has a supportive stance on self-build/custom build development, subject to all other policies in the Plan.
Should include sustainability measures. Requiring proposals 'not to have a detrimental impact upon the highway network' is not in line with the NPPF.  Some support for home working and small-scale businesses in rural areas. Alternatively, some felt the policy does not positively support all economic development.	Policy amended to 'unacceptable impact upon highway network' and requiring high-quality sustainable design.  Policy supports employment development subject to criteria. In line with Strategic Employment policy, LP12 has been amended to include consideration of the settlement hierarchy.
Some comments welcomed protection measures to safeguard employment land, and some felt measures should be stronger. Alternatively, some felt the policy was overly restricting and that restricting redevelopment is neither necessary nor justified, particularly for land not required in this plan period.	Protecting employment land, subject to the satisfaction of policy on the basis of each application on it's individual merits, is crucial for ensuring a diversity of land supply and enabling the maintenance of viable employment sites, whilst ensuring flexibility to meet future economic demands in compliance with the NPPF compliance.  The proposed changes to the use class
	Should include sustainability measures. Requiring proposals 'not to have a detrimental impact upon the highway network' is not in line with the NPPF.  Some support for home working and small-scale businesses in rural areas. Alternatively, some felt the policy does not positively support all economic development.  Some comments welcomed protection measures to safeguard employment land, and some felt measures should be stronger. Alternatively, some felt the policy was overly restricting and that restricting redevelopment is neither necessary nor justified, particularly for land not required in this plan

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP13 – Safeguarding Economic Opportunities continued		increase the importance of considering sites on their individual merits to maintain overall land supply for employment uses and whilst supporting the vitality and viability of town centres.
	No justification for requiring financial contributions or alternative land if a site is lost from employment use or exploring community use prior to other non-employment uses.	Requirements include ensuring a positive outcome from the loss of existing employment land that benefits local communities. Requirement for community use is in current Babergh policy.
LP14 – Town Centre and Retail (previously LP13 – Retail)	Thresholds set for A1 uses in Primary Shopping Frontages are not reflective of current trends. Secondary Shopping Frontages are not justified. No evidence or justification for 400m2 threshold for impact assessment for out of town applications.	Following changes to the Use Classes Order the policy has been reviewed to reflect a more flexible approach to town centre uses.
LP15 – Tourism and Leisure (previously LP14 – Tourism and Leisure)	Policy considered to be contradictory and vague and the requirement for impact assessment for leisure facility proposals is not justified and lacks clarity.	Policy has been reviewed in conjunction with LP14 (above), with elements incorporated into a Town Centre and Retail policy.
LP16 – Countryside Tourist Accommodation (previously LP15 – Countryside Tourist Accommodation)	Policy should be removed. Alternatively, a marketing period of 12 months is not enough, should be 2 years.	Policy is considered appropriate to managing countryside tourist accommodation. 12 months is considered appropriate and is in line with other Draft JLP policies.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP17 – Environmental Protection (previously LP16 – Environmental Protection)	Water quality – objections received stating that this requirement was not warranted and is overly prescriptive. Environment Agency sought to strengthen the policy in line with the Water Framework Directive.	Policy wording has been amended to link better to the Water Framework Directive.
	Object to the inclusion of Construction Environment Management Plans (CEMP) included in policy.	The Councils agree with the recommendations of the Habitats Regulation Assessment (HRA) for the introduction of CEMPs in policy.
LP18 – Biodiversity (Previously LP17 - Biodiversity)	Need an updated green infrastructure strategy.	The Councils have established a mechanism for the provision and management of green infrastructure in particularly sensitive areas through the Recreational disturbance Avoidance and Mitigation Strategy (RAMS). All major development is expected to make positive contributions to biodiversity and green infrastructure opportunities which adds to the overall quality and provision.
	<ul> <li>Starting point of policy should be to enhance biodiversity then avoid impacts, mitigate or compensate for loss.</li> <li>Policy should conserve and restore Priority Habitats and include protection of ancient and veteran trees.</li> <li>Clarity sought on if County and Local Wildlife Sites are covered in the policy.</li> </ul>	Policy has amended to incorporate these changes and provide clarity surrounding County and Local Wildlife Sites.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP18 - Biodiversity Continued	Biodiversity Net Gain should be required to use DEFRA metrics.	'Suitable indicators for monitoring biodiversity' retained in policy, this future proofs the policy. DEFRA metric currently supported by NPPG.
LP19 – Landscape (Previously LP18 - Landscape)	Should include Special Landscape Areas (SLA) and Visually Important Open Spaces (VIOS)	The Council's have no evidence to justify retaining SLAs and VIOS designations. Joint Babergh and Mid Suffolk Landscape Character Assessment (Aug 2015) identifies the specific landscape and settlement characteristics within the Districts and further assessments have been conducted of Draft JLP allocations. VIOS's of recreational value are contained within the Designated Open Space policy.
	<ul> <li>Consideration of historic environment should be included.</li> <li>Should require comprehensive landscape schemes as part of application.</li> </ul>	Policy has been amended to include these aspects.
LP20 – Area of Outstanding Natural Beauty (AONB) (Previously LP19 – Area of Outstanding Natural Beauty)	<ul> <li>No reference to 2016 LDA Design report regarding AONB's Natural Beauty and Special Qualities Indicators.</li> <li>Project Areas to both AONB's need to be included in policy.</li> </ul>	Policy has been amended to incorporate these suggestions.
	Policy fails to differentiate between development within AONB or outside, term 'near' AONB is not consistent with NPPF.	Considered appropriate to include the setting of AONB as a planning consideration.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP20 – Area of Outstanding Natural Beauty (AONB) Continued	Policy should refer to the NPPF presumption that inappropriate development should be refused	NPPF is a material consideration and the Draft JLP policy seeks to compliment this and avoid repetition.
LP21 – The Historic Environment (Previously LP20 – The Historic Environment)	<ul> <li>Reference should be made to Historic England guidance note: The Setting of Heritage Assets.</li> <li>Policy should state how development should address potential archaeological assets.</li> <li>Replace 'buildings at risk' with Heritage at Risk.</li> </ul>	Policy has been amended to refer to all relevant Historic England Guidance, to incorporate archaeology and Heritage at Risk.
	Recommend considering whether the policy can be distilled or restructured to improve readability.  Policy is not NPPF compliant as it provides a narrower approach that the NPPF, and does not reflect differences in the NPPF tests between substantial harm and less than substantial harm, or the different tests for substantial harm to Grade II and Grade II* & Grade I heritage assets.	Policy has been restructured with the use of subheadings.  Policy has been amended to refer to the relevant national policy (e.g. NPPF).
LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Use (Previously LP21 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Use)	Comments raised regarding implementation of the policy and how planning judgements are applied. Concern raised over highway safety impacts.	Policy amended to include considerations of highway safety, and minor amendments have been made to provide some clarity.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP23 – Agricultural Land to Residential Garden Land (Previously LP22 – Agricultural Land to Residential Garden Land)	Policy is considered unnecessarily onerous, over restrictive, disproportionate and unjustified. Comments received saying there should be an assumption against such change of uses.	Policy is flexible to assess all situations and to apply proportionate assessments to such cases to allow for a comprehensive assessment or sound/well balanced recommendation for achieving sustainable development. Policy follows a sequential and logical approach.
	Concerns were raised over applications for dwellings as a result of change of use to residential garden land.	The policy allows for relevant and necessary conditions to be imposed in such cases.
LP24 – New Agricultural/Rural Buildings in the Countryside (note: New JLP Policy)	Many comments were received requesting a policy which addressed intensive agricultural uses such as poultry farms and processing. Main issues raised were – highways; impact on character and appearance of locality; amenity issues; and conflicts with existing businesses.	Draft JLP includes a new policy to address these matters.
LP25 – Sustainable Construction and Design (Previously LP23 – Sustainable Construction and Design)	Policy needs to demand higher standards to meet climate change issues, for example, solar panels and air/ground source heat pumps as a minimum. Some concern that standards are set too high which would impact on viability and deliverability.	Policy offers a flexible approach to allow for assessments on a site by site basis and allows for new technological advances. Policy has been viability tested. The Councils have acknowledged status of Climate Emergency and have a responsibility to support sustainability measures.
	Reference to legislation and standards should include mechanism to allow for these to be superseded.	Policy has been amended to incorporate this change to allow for the policy to be future proofed.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP25 – Sustainable Construction and Design continued	Objections to water efficiency standards were received, stating there was no justification. Alternatively, some felt higher water efficiency standards need to be a greater priority, including consideration of water efficiency for commercial development.	Water efficiency standards are supported by Anglia Water and Essex and Suffolk Water, and have been viability tested. Policy now includes consideration of water efficiency for commercial development.
LP26 – Design and Residential Amenity (previously LP24 – Design and Residential Amenity)	No evidence to justify minimum space standards. Alternatively, some felt that the plan should exceed national space standards.	Space standards are set to the national standards and have been viability tested through the Councils evidence base. No evidence to justify an alternative space standard.
	<ul> <li>Policy should include:</li> <li>Secure cycle storage.</li> <li>Consideration of the historic environment.</li> <li>Include requirements to design positively for those with dementia.</li> </ul>	These aspects have now been included in policy.
	Objections to policy requiring 'Building for Life' criteria and/or 'Lifetime Homes' standard and highlighting an overlap between the two.	Building for Life is specifically referenced in the NPPF and is included in the policy. Lifetime Homes standards have been removed from the policy to provide clarity and aid with the effectiveness of the policy.
	Object to inclusion of village design statements, as this gives them high status.	Status of village design statements and parish plans depends on a number of circumstances, including their age and conformity with the NPPF and the emerging Draft JLP. Accordingly, they are considered appropriate to reference.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP27 - Energy Sources, Storage and Distribution (previously LP25 - Energy Sources, Storage and Distribution)	<ul> <li>Period of 3 months unreasonably short, alternative suggestion of 6 months submitted.</li> <li>Policy should require that in the AONB any new energy supply will only be supported by underground power lines and cabling.</li> </ul>	Suggestions have been included within the policy.
LP28 – Water resources and infrastructure & LP29 – Flood Risk and Vulnerability (previously LP26 – Flood Risk and LP27 – Sustainable	Need to emphasise water resources, infrastructure and management in one policy and flooding and surface water drainage in another.	As a result of comments received during the 2019 consultation and subsequent engagement with statutory consultees, the policies have been restructured to provide clarity.
Drainage System)	An updated Strategic Flood Risk Assessment (SFRA) and Water Cycle Study is required.	An updated SFRA and Water Cycle Study has been produced alongside the Draft JLP.
LP30 – Designated Open Space	Policy needs to be stronger in resisting development on Open Space.	Policy criteria is in line with the NPPF and considered appropriate.
(previously LP28 – Designated Open Space)	Not consistent with national policy to require new development to address wider deficits, these should be addressed through the Open Space Strategy within wider projects or within the Green Infrastructure Strategy.	If an area does not have an appropriate area for open space provision it is acceptable planning practice to expect contributions toward open space within the locality to ensure appropriate level of open space and amenity land has been provided for the expected increase in population.
LP31 – Services and Facilities within the Community (previously LP29 – Services and Facilities Within the Community)	Request to add following services / facilities to policy:	The policy has been amended with the suggested additions being added into the policy.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP32 – Safe, Sustainable and Active Transport (previously LP30 – Safe, Sustainable and Active Transport)	<ul> <li>Policy should set out:         <ul> <li>indicative thresholds for requesting transport statement or transport assessment.</li> </ul> </li> <li>that development will be expected to contribute to the delivery of sustainable transport strategies for managing the cumulative impacts of growth.</li> <li>that where necessary development will be expected to provide home to school transport contributions.</li> </ul>	These aspects have been added to the policy.
LP33 – Managing Infrastructure Provision (previously LP31 – Managing Infrastructure Provision)	Support for the principle of the policy, however there is a need to ensure that all cumulative impacts on infrastructure are considered on a scheme by scheme basis.  Consideration needs to be given to the timing and level of infrastructure provision which satisfies the LPA and relevant infrastructure providers.	Addressing cumulative impacts on infrastructure is justified and is a key part of this policy, and through the Councils Infrastructure Delivery Plan (IDP).  The policy has been amended with the suggested additions being added into the policy
LP34 – Health and Education Provision (previously LP32 – Health and Education Provision)	<ul> <li>Concerns raised that there was no provision for avoiding land locking existing infrastructure for future expansion.</li> <li>Policy should state that the Council will enter pre-application discussions with promoters &amp; providers to develop a collaborative approach to suitable applications.</li> </ul>	The policy has been amended with the suggested additions being added into the policy.

Policy	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
LP35 – Developer Contributions and Planning Obligations (previously LP33 – Developer Contributions and Planning Obligations)	Amend last sentence on para 1 to read: applicants are required to mitigate the additional impacts their development will place on infrastructure and to ensure that essential facilities and services are available to local communities as they are required	The policy has been amended with the suggested wording being added into the policy.

## Place Section - Main Issues Raised (2019) and how they have been taken into account

16. All comments received in relation to sites have been reviewed and considered in the production of the JLP. A number of evidence base documents have been used to inform the JLP, some of which were produced after the Regulation 18 consultation in 2019.

## **Babergh Place Section**

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Acton	LA045	Objections include:     Highways concerns;     Outside settlement boundary;     Lack of infrastructure capacity;     No local employment;     Disproportionate development;     Impact on wildlife;     Heritage impact;	Site has been granted planning permission.
Acton	N/A	SS0962 site should be allocated within the JLP.	Site not considered suitable through the SHELAA process.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Acton	N/A	Settlement boundary should exclude allotments on Barrow Hill.	Settlement boundary has been amended to exclude allotments on Barrow Hill.
Belstead	LA005	Objections include:  • Heritage impact.	Site has been granted planning permission.
Bentley	N/A (SS0820)	Objections include:         • Site is not justified;         • Impact on AONB / landscape  Alternatively, site should be expanded to 45 dwellings.	Site is well related to the existing settlement pattern and the primary school is located within walking distance. Landscape assessment has informed the Draft JLP. Expanding site was not considered suitable through the SHELAA process.
Bentley	N/A	SS0395 – site should be allocated for 52 dwellings.	Site not considered favourable for allocation.
Bildeston	LA048	Objections include: <ul> <li>Highways concerns;</li> <li>Deliverability / viability issues;</li> <li>Would increase flood risk elsewhere;</li> <li>Heritage concerns;</li> <li>Former Taylors Garage site should be allocated instead.</li> </ul> <li>Policy should require (SCC):         <ul> <li>Archaeological assessment</li> <li>Footway link to existing footway</li> </ul> </li>	Services and facilities located within walking distance. Strategic Flood Risk Assessment (SFRA) and heritage assessment has informed the Draft JLP. Infrastructure Delivery Plan (IDP) and consultation with the Local Highway Authority has informed the Draft JLP. Policy amendments suggested by SCC have been incorporated into the policy.  Alternative site is not considered suitable for allocation.
Boxford	N/A	network; Further growth should be attributed to Boxford through the allocation of sites SS0292, SS0293 and SS1128.	Infrastructure Delivery Plan has identified insufficient primary school capacity in Boxford with limited opportunities for the primary school to expand in its current location. Some of the sites not considered suitable through the SHELAA process.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Brantham	LA053	Objections include:	Further landscape and heritage assessments have been conducted to inform the Draft JLP.  Policy amendments suggested by SCC have been incorporated into the policy.
		<ul> <li>Policy should require (SCC):</li> <li>Archaeological assessment;</li> <li>Footways along frontage, linking to existing footway network.</li> </ul>	
Brantham	N/A	Land west of Brantham Hill should be allocated and Land at Church Lane.	Land west of Brantham Hill not considered suitable for allocation. Land at Church Lane not considered suitable through SHELAA process.
Capel St Mary	LA054	Objections include:	Site has been granted planning permission.  Extending the site was not considered suitable through the SHELAA process.
Capel St Mary	LA055	Site should be expanded.  Objections include:  Disproportionate development;  Lack of demand / need;  Lack of services / facilities;  Highways concerns;  Healthcare and education capacity;  Environmental impact;  Heritage impact (need a HIA);  Landscape impact;	Level of growth proposed through the Draft JLP is considered appropriate in line with the need to meet overall housing requirement, the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Further landscape and heritage assessments have been conducted to inform the Draft JLP.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Capel St Mary (LA055) continued		<ul> <li>No local employment;</li> <li>Loss of agricultural land;</li> <li>Policy should require (SCC):         <ul> <li>Archaeological assessment;</li> <li>Protect and enhance nearby Public Rights of Way;</li> <li>Transport assessment;</li> <li>Development to link to footways north of the site</li> </ul> </li> <li>Some supportive comments received, and requests for bungalows and dwellings for downsizing and/or first time buyers.</li> </ul>	Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highways Authority) and transport modelling have informed the Draft JLP. Site allocation includes the provision of employment land.  Housing mix is addressed through the relevant Draft JLP policies and development management process.  Policy amendments suggested by SCC have been incorporated into policy.
Chelmondiston (including Lin's Lane & Pin Mill)	N/A	General support for settlement boundary and sites.	Noted.
Chelmondiston	N/A	SS0204 should be expanded.  Following sites not in the JLP should be allocated:  • SS1115 – Land at Hill Farm;  • SS1096 – Land north of Main Road;	Extending SS0204 is not considered suitable through the SHELAA process.  SS1115 and SS1096 not considered suitable through the SHELAA process.
Chilton	LA041	Objections include:     Highways concerns;     Lack of infrastructure capacity;     Heritage impact.	Site has been granted planning permission.

	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Chilton	N/A	General support for not allocating land to the north of Church Field Road, Chilton. Infrastructure concerns highlighted.	Noted.
Cockfield (all settlements within the Parish)	N/A	General support for settlement boundaries identified.	Noted.
Copdock & Washbrook	LA008	<ul> <li>Access should be achieved from Old London Road;</li> <li>Need safe pedestrian route across Old London Road;</li> <li>Disproportionate development;</li> <li>Heritage impact (need a HIA);</li> <li>Landscape impact;</li> <li>Need to assess impact on Copdock Interchange;</li> <li>Infrastructure capacity;</li> <li>Environmental impact;</li> <li>Must retain allotments;</li> </ul> Policy should require (SCC): <ul> <li>Archaeological assessment;</li> <li>Flood risk assessment;</li> <li>Developer to test if the use of minerals on site is appropriate</li> <li>Protect and enhance nearby rights of way</li> <li>Transport assessment</li> </ul>	Further landscape and heritage assessments have been conducted to inform the Draft JLP. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including Local Highways Authority) have informed the Draft JLP. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highways Authority) and transport modelling have informed the Draft JLP. Level of growth proposed is considered appropriate in line with the need to meet overall housing requirement, the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints.  Policy amendments suggested by SCC have been incorporated into the policy. Flood risk has been assessed by the Strategic Flood Risk Assessment (SFRA) and addressed through the relevant Draft JLP policies.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
		Some support received for site if access is achieved from Old London Road.	
Copdock & Washbrook	LA009	<ul> <li>Objections include:</li> <li>Lack of infrastructure;</li> <li>Object to number of dwellings;</li> <li>Need to assess impact on Copdock Interchange</li> <li>SS1175 should be allocated instead of this site.</li> </ul>	Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highways Authority) and transport modelling have informed the Draft JLP. Level of growth proposed is considered acceptable in line with the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints.
		Some support received for site.  Policy should require (SCC):  • Flood risk assessment;  • Public rights of way to be protected/enhanced;  • Transport assessment.	Policy amendments suggested by SCC have been incorporated into the policy. Flood risk has been assessed by the Strategic Flood Risk Assessment (SFRA) and addressed through the relevant Draft JLP policies.  SS1175 is not considered suitable for allocation.
East Bergholt	LA059	Objections include:  • Unclear on assessment of impact on AONB;	Site has been granted planning permission.
East Bergholt	LA060	Objections include:  • Unclear on assessment of impact on AONB;  • Heritage impact.  Site should be expanded to 220 dwellings.	Site has been granted planning permission. Additional area was not considered suitable through the SHELAA process.
East Bergholt	LA061	Objections include:	Site has been granted planning permission.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
		<ul> <li>Unclear on assessment of impact on AONB;</li> <li>Heritage impact.</li> </ul>	
Elmsett	N/A	SS0230 – Site should be allocated in the JLP.	Site not considered suitable through the SHELAA process.
Great Cornard	LA039	Objections include:	Site granted planning permission.
Great Cornard	LA040	Objections include:	Site granted planning permission.
Great Cornard	LA042	Objections include: <ul> <li>Disproportionate development;</li> <li>Landscape impact;</li> <li>Environmental impact;</li> <li>Infrastructure capacity / availability;</li> <li>Highways concerns;</li> <li>Flood risk;</li> <li>Impact on wildlife;</li> <li>Loss of amenity land;</li> <li>Site previously rejected by Inspector;</li> </ul>	Level of growth proposed through the Draft JLP is considered appropriate in line with the need to meet overall housing requirement, the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Landscape and Strategic Flood Risk Assessments (SFRA), and Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highways Authority) and transport modelling have informed the Draft JLP.
		Policy should require (SCC):	

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
		<ul> <li>Protect / enhance rights of way;</li> <li>Archaeological assessment;</li> <li>Flood risk assessment;</li> <li>Developer to test if the use of minerals on site is appropriate</li> <li>Transport assessment;</li> <li>Footway improvements;</li> </ul>	Policy requires amenity land / local nature reserve to be retained or a suitable replacement to be provided.  Policy amendments suggested by SCC have been incorporated into the policy. Flood risk has been assessed by the Strategic Flood Risk Assessment (SFRA) and addressed through the relevant Draft JLP policies.
Great Cornard	N/A	SS0220 — Site not allocated in 2019 document - Site should be allocated within the Draft JLP. Support received for not allocating site include:  • Environmental impact; • Highways impact; • Flood concerns; • Infrastructure capacity	Site not considered suitable for allocation.
Great Cornard	N/A	Site for a new cemetery should be identified.	The Draft JLP includes cemeteries as a 'Community Facility' under policy LP31 which supports the provision of new facilities.
Great Waldingfield	N/A (SS1068)	Objections include:     Highways impact;     Heritage concerns;     Distance from amenities;     Proximity to a County Wildlife Site;     Lack of infrastructure;     Flood risk;     Site is adjacent to development site for 32 dwellings;	Site is considered suitable for allocation taking into account the spatial strategy of the plan and its wider context. Heritage, Flood Risk Assessments (SFRA) and Infrastructure Delivery Plan (IDP), have informed the Draft JLP.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Hadleigh	LA027	Objections include:  • Need to address issues with adjoining cricket club	Site has been granted planning permission subject to S106.
Hadleigh	LA028	Objections include:	Level of growth is considered appropriate taking into account the spatial strategy of the plan. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers have informed the Draft JLP. Policy amendments suggested by SCC have been incorporated into the policy. Flood risk has been assessed by the Strategic Flood Risk Assessment (SFRA) and addressed through the relevant Draft JLP policies.
Hadleigh	N/A	SS0909 and SS0192 should be allocated.	SS0909 - Site SS0909 is not considered suitable for allocation, and SS0192.). not considered suitable through the SHELAA process.
Harkstead	N/A	Settlement boundary should be drawn tighter to properties to the north of The Street.	Settlement boundary has been amended.
Hartest	N/A	Settlement boundary to the east extends beyond the area permitted for development under an application (15/00061).	The settlement boundary has now been amended to match the development area under the planning application.
Holbrook	LA068	Objections include:	Site has been granted planning permission for 7 dwellings, and policy amended to same number of dwellings. Larger site was not considered to be suitable through the SHELAA process.
Holbrook	N/A	SS0201 should be allocated.	Site not considered suitable through the SHELAA process.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Holton St Mary	N/A (SS0752)	Objections include:	Infrastructure Delivery Plan (IDP) and consultation with relevant service providers, and heritage assessments have informed the Draft JLP. There is a need to meet District wide housing need.
Lavenham	LA069	Some support if pedestrian and cycle routes are well planned.	Noted.
Lawshall	N/A (SS0682)	Some support for the provision settlement boundaries to allow for a degree of growth. Alternatively objections received stating that any changes to the settlement boundary should be determined by the Neighbourhood Plan.	Site is well related to the settlement character and would contribute towards meeting district wide housing needs.
Lawshall – Lawshall Green / Hibbs Green	N/A	Some support for settlement boundary, but concern also raised that it would have a significant detrimental impact on settlement character.	Settlement boundary has been amended to remove large parcels of agricultural land.
Leavenheath	LA098	Objections include:      Loss of trees and privacy;     Lack of infrastructure / facilities;     Highway safety concerns;     Drainage;     Limited bus service;     Impact on wildlife;     Too much development;	Site is well related to a significant existing community and would help to support rural vitality and provide affordable housing. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers, including the Local Highways Authority, has informed the Draft JLP. Level of growth is deemed appropriate in line with spatial strategy of the Draft JLP.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Leavenheath (LA098) continued		<ul> <li>Policy should require (SCC):</li> <li>Public rights of way to be retained / enhanced;</li> <li>Footway along site frontage to connect to existing network;</li> <li>Provision of home to school contributions</li> <li>Site to be allocated for 80 dwellings.</li> </ul>	Policy amendments suggested by SCC have been incorporated into the policy.  A larger site was not considered suitable through the SHELAA process.
Little Waldingfield	N/A (SS0874)	Objections include:	Site is not considered favourable for allocation.
Lindsey – Church & Lindsey Tye	N/A	Some support for settlement boundaries.	Noted.
Little Cornard	N/A	Bures Road settlement boundary is appropriate. Concern that Slough Lane settlement boundary would encourage inappropriate development due to impact on AONB / landscape.	This would be considered through the planning application process, where the relevant Draft JLP policies would apply.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Long Melford	N/A	More growth should be attributed to the village.  Object to SS0934 not being allocated within the JLP.	Level of growth proposed is considered acceptable in line with the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. SS0934 was not considered to be suitable through the SHELAA process.
Polstead (all settlements within the parish)	N/A	Support for settlement boundaries identified.	Noted.
Shotley	LA075	Objections include:	Further heritage and landscape assessments have informed the Draft JLP. Policy amendments suggested by SCC have been incorporated into the policy. Flood risk has been assessed by the Strategic Flood Risk Assessment (SFRA) and addressed through the relevant Draft JLP policies.
Sproughton	LA012	Objections include:      Lack of infrastructure;     Highways capacity / safety;     Impact on heritage assets;     Disproportionate development / not required locally;     Environmental impact;     Concern for loss of allotments;     Landscape impact;     Loss of high quality agricultural land;     Impact on Habitat Sites & wildlife.  Policy should require (SCC):	Level of growth proposed is considered appropriate in line with the need to meet overall housing requirement, the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Heritage and landscape assessments have informed the Draft JLP. Site boundary amended to exclude allotments, ensuring that they are retained. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP. Policy amendments suggested by SCC have been incorporated into the Draft JLP.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Sproughton (LA012) continued		<ul> <li>Public rights of way should be retained / enhanced.</li> </ul>	
Sproughton	LA013	Objections include:      Loss of farming land which absorbs carbon dioxide;      Highways capacity / safety;     Site is green corridor;     Impact on heritage assets;     Impact on landscape     Drainage and flood concerns;     Site is undeliverable;     Impact on Habitat Sites;     Disproportionate development / no local need;  Policy should require (SCC):     Archaeological assessment;     Flood risk assessment;     Rights of way to be retained and enhanced;     Provision of a transport assessment.  Developers support allocation but confirmed that the site capacity is lower than Draft JLP proposals.	Level of growth proposed is considered appropriate in line with the need to meet overall housing requirement, the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Heritage and landscape assessments have informed the Draft JLP. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP. Further landscape and heritage assessments conducted which have informed the Draft JLP. Impact on Habitat Sites has been considered through the Habitat Regulation Assessment.  Policy amendments suggested by SCC have been incorporated into the policy. Flood risk has been assessed by the Strategic Flood Risk Assessment (SFRA) and addressed through the relevant Draft JLP policies.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Sproughton	N/A	SS0206 should be allocated in the Draft JLP.	Site not considered suitable through the SHELAA process.
Stoke by Nayland	N/A (SS0465)	<ul> <li>Objections include:         <ul> <li>Development of site could hamper local aspirations for the site, which is part of a larger land-holding;</li> <li>Revisions to settlement boundary should only be achieved through the Neighbourhood Plan</li> <li>Potential impact on heritage assets, including Conservation Area.</li> </ul> </li> </ul>	Site is considered suitable for allocation. The Draft JLP needs to meet the District wide housing requirement.
Stoke by Nayland	N/A (SS0709)	Objections include:         Revisions to settlement boundary should only be achieved through the Neighbourhood Plan	Site is considered suitable for allocation. The Draft JLP needs to meet the District wide housing requirement.
Stutton	N/A	Request to extend settlement boundary to include the rear garden of a property south of Hyam's Lane.	Inclusion of the whole rear garden of this property would not reflect the built up area of the settlement.
Stutton	N/A	SS1049 should be allocated within the Draft JLP.	Site not considered suitable through the SHELAA process.
Sudbury	N/A	Site promoters for the Delphi Employment Site request the site is allocated for a mixed use scheme including 150 dwellings.	Site is located within a Strategic Employment Zone where the relevant Draft JLP policies would apply.
Tattingstone	N/A	The White Horse public house should be included in the settlement boundary.	This recommendation has been incorporated into the Draft JLP.
Whatfield	N/A	Land north of The Street and Land south of Naughton Road should be allocated within the JLP.	Sites not considered suitable through the SHELAA process.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Wherstead	LA016	Objections include:  • Limited public transport and no local services  • Impact on AONB;  • Impact on heritage assets;	Site granted planning permission.
Wherstead	LA101	Policy should require a direct new road link to avoid traffic using The Street. Object as site is adjacent to the AONB.	Site is not considered suitable for allocation in the Draft JLP.
Woolverstone	N/A	Settlement boundary should exclude the Walled Garden	This recommendation has been incorporated into the Draft JLP.
Woolverstone	N/A (SS0203)	Objections include:     Loss of high quality agricultural land;     Impact on Conservation Area     Adjacent to AONB, and within AONB project area;     Lack of infrastructure	Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) has informed the Draft JLP. Heritage and landscape assessments used to inform the Draft JLP.
Woolverstone	N/A (SS0255)	Objections include:     Loss of high quality agricultural land;     Impact on Conservation Area     Lack of infrastructure	Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) has informed the Draft JLP. Heritage and landscape assessments used to inform the Draft JLP.

## **Mid Suffolk Place Section**

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Bacton	LA046	Objections include:	Site granted planning permission.
Bacton	LA047	Objections include:  • Heritage impact	Site granted planning permission.
Bacton	N/A	A site was included within the settlement boundary due to a mapping error, which was highlighted during the consultation.	This error has been addressed in the latest iteration of the Draft JLP.
Badwell Ash – Long Thurlow	N/A (SS0558)	Objections include:	The Draft JLP is supported by a heritage assessment and Strategic Flood Risk Assessment.  A larger site area was not considered suitable through the SHELAA process.
Barking	N/A	SS1075 should be allocated within the JLP.	Site not considered suitable through the SHELAA process.
Battisford Tye	N/A	SS0659 should be allocated within the JLP.	Site not considered suitable through the SHELAA process.
Baylham	N/A	Settlement boundary should be extended to the north.	Settlement boundary is considered to be appropriate.
Bedfield – Little Green	N/A	An additional area should be included within the settlement boundary.	Recommendation has been included within the Draft JLP as it represents the built form of the settlement.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Bedfield – Long Green	N/A	Allotments should be removed from the settlement boundary.	Recommendation has been included within the Draft JLP.
Beyton	N/A	Object to settlement boundary changes. Any changes should be initiated by the Beyton Neighbourhood Plan.	The Draft JLP needs to meet District wide housing need. Sites included within the boundary as considered to be suitable for allocation.
Botesdale & Rickinghall	LA051	Objections include:  Site not identified in the Neighbourhood Plan; Lack of infrastructure; Highways impact; Disproportionate development; Flood risk; Heritage impact (including Conservation Area)  Policy should require (SCC): Archaeological assessment; Flood risk assessment; Rights of way to be retained and enhanced;	Site is not considered suitable for allocation in the Draft JLP.
Botesdale & Rickinghall	LA052	Objections include:	Site granted planning permission. A larger site area was not considered suitable through the SHELAA process.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Bramford	LA006	Objections include:      Coalescence with Bramford & Sproughton;     Contrary to Bramford Parish Plan (2012)      Disproportionate development     Lack of infrastructure     Loss of agricultural land	Site granted planning permission.
Bramford	N/A	Open space designation for Clarice House Leisure Club should be removed.	Open space designation for this area removed.
Brundish	N/A	Settlement boundary should be removed. Alternatively, village green should be removed, leaving either two settlement boundaries or one settlement boundary for dwellings at Crown Corner.	Settlement boundary has excluded the village green, and has included dwellings at Crown Corner consistent with criteria applied across the Districts.
Claydon / Barham	LA001	Objections include: <ul> <li>Disproportionate development;</li> <li>Heritage impact (request for HIA);</li> <li>Highways impact;</li> </ul> <li>Policy should require (SCC):         <ul> <li>Archaeological assessment;</li> <li>Flood risk assessment;</li> <li>Rights of way to be retained and enhanced;</li> <li>Transport assessment</li> </ul> </li>	Level of growth proposed through the Draft JLP is considered acceptable in line with the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP. Site subject to detailed HIA assessment, which has informed the site allocation. Policy amendments suggested by SCC have been incorporated into the Draft JLP. Flood risk is addressed through the relevant Draft JLP policies / Strategic Flood Risk Assessment.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Claydon / Barham	LA002	Objections include: <ul> <li>Disproportionate development;</li> <li>Heritage impact (request for HIA);</li> <li>Highways impact;</li> </ul> <li>Policy should require (SCC):         <ul> <li>Archaeological assessment;</li> <li>Flood risk assessment;</li> <li>Rights of way to be retained and enhanced;</li> <li>Transport assessment</li> </ul> </li>	Level of growth proposed is considered acceptable in line with the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP. Site subject to detailed HIA assessment, which has informed the site allocation. Policy amendments suggested by SCC have been incorporated into the Draft JLP. Flood risk is addressed through the relevant Draft JLP policies / Strategic Flood Risk Assessment.
Claydon / Barham	LA003	Objections include: <ul> <li>Disproportionate development;</li> <li>Heritage impact (request for HIA);</li> <li>Highways impact;</li> <li>Flood risk;</li> </ul> <li>Policy should require (SCC):         <ul> <li>Archaeological assessment</li> <li>Flood risk assessment</li> <li>Rights of way to be retained and enhanced</li> </ul> </li>	Level of growth proposed is considered acceptable in line with the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP. Site subject to detailed HIA assessment, which has informed the site allocation. Policy amendments suggested by SCC have been incorporated into the Draft JLP. Flood risk is addressed through the relevant Draft JLP policies / Strategic Flood Risk Assessment.
Claydon / Barham	N/A	SS1239 - Land east of Ipswich Road should be allocated.	Site is not considered suitable for allocation in the Draft JLP.
Coddenham	N/A	Request for settlement boundary to be exclude paddocks on School Lane.	Recommendation has been incorporated into the Draft JLP.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Combs	N/A (SS0869)	Objection to increased settlement boundary.	Site considered suitable for allocation in the Draft JLP.
Combs	N/A	SS0656 and Combs Tannery should be allocated for residential development	Sites not considered suitable through the SHELAA process.
Cotton	N/A (SS0806)	Objections include:  • Flood risk;	Site not considered suitable for allocation in the Draft JLP.
Debenham	LA056	Objections include:	Site is allocated within the made Debenham NP.
Debenham	LA057	Objections include:  • Heritage impact; Support for site allocated in the Debenham Neighbourhood Plan.	Site is allocated within the made Debenham NP.
Debenham	LA058	Objections include:     • Flood risk Support for site allocated in the Debenham Neighbourhood Plan.	Site is allocated within the made Debenham NP.
Debenham	N/A (SS0267 & SS0642)	Further growth should be attributed to the settlement. SS0267 & SS0642 are the most appropriate, viable and achievable options to deliver housing and infrastructure.	Level of growth proposed through the Draft JLP is considered acceptable in line with the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Sites are being taken forward in the Debenham NP process.
Earl Stonham	N/A	Object to settlement boundary at Wicks Lane - Forward Green. Additional request to include a rear garden near Haggars Mead within the settlement boundary.	Settlement boundary at Wicks Lane is consistent with district wide approach to providing settlement boundaries. Inclusion of a rear garden near

LA064	Objections include:  • Amenity Green Space should be	Haggars Mead is not considered appropriate in line with the built form of the settlement.  Policy requires amenity green space to be retained
LA064	Amenity Green Space should be	
	retained  • Highways concerns, particularly at junctions;  • Heritage impact; • Infrastructure capacity;  Policy should require (SCC): • Archaeological assessment • Flood risk assessment • Transport assessment	or provision of an adequate replacement. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP. Heritage assessments have informed the Draft JLP. Policy amendments recommended by SCC have been incorporated into the site allocation policy. Flood risk is addressed through the relevant Draft JLP policies / Strategic Flood Risk Assessment.
LA065	Objections include:	Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP. Heritage assessments have informed the Draft JLP.
LA066	Objections include:  • Highways concerns, particularly at junctions; • Heritage impact; • Infrastructure capacity;  Policy should require (SCC):	Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority), and transport modelling work has informed the Draft JLP. Heritage assessments have informed the Draft JLP.  Requirement for archaeological assessment added to policy. Flood risk addressed through the relevant
		<ul> <li>Infrastructure capacity;</li> <li>Policy should require (SCC):         <ul> <li>Archaeological assessment</li> <li>Flood risk assessment</li> <li>Transport assessment</li> </ul> </li> <li>LA065 Objections include:         <ul> <li>Highways concerns, particularly at junctions;</li> <li>Infrastructure capacity;</li> </ul> </li> <li>LA066 Objections include:         <ul> <li>Highways concerns, particularly at junctions;</li> <li>Heritage impact;</li> <li>Infrastructure capacity;</li> </ul> </li> </ul>

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
			Draft JLP policies / Strategic Flood Risk Assessment.
Elmswell	N/A	SS0662 and SS0915 should be allocated.	Site not considered suitable through the SHELAA process.
Eye	LA020	Objections include:  • Justification for pre-school required Support for site received.	Site allocated within the Eye Neighbourhood Plan.
Eye	LA021	Objections include:  • Number of dwellings is too high	Site granted planning permission and allocated within the Eye Neighbourhood Plan.
Eye	LA022	Objections include:	Site is not considered suitable for allocation within the Draft JLP.
Eye	LA099	Objections include:  • Highway concerns;	Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP.
Eye	N/A	Sites identified within the Eye Neighbourhood Plan should be allocated. SS0548 should be allocated.	SS0548 was not considered suitable through the SHELAA process.
Finningham	N/A	SS0807 should be allocated.	Site not considered suitable through the SHELAA process.
Framsden	N/A	SS1145 should be allocated.	Site not considered suitable through the SHELAA process.
Gipping	N/A	Two dwellings to the south of the settlement should be included in the settlement boundary.	Including these dwellings would not be consistent with the District wide approach.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Great Ashfield	N/A	More flexibility should be applied in producing the settlement boundary.	Settlement boundary is considered appropriate and allows for some windfall development, subject to the relevant Draft JLP policies.
Great Finborough	N/A (SS1055)	Objections include:	Site is not considered suitable for allocation.
Haughley	N/A	Further growth should be attributed to the settlement in line with the Neighbourhood Plan.	Level of growth identified in this iteration of the Draft JLP is compatible with the made Haughley Neighbourhood Plan.
Haughely - Green	N/A	Request to include property at the end of Fir Tree Lane within the settlement boundary.	Not considered appropriate to extend the settlement boundary in this location.
Hemingstone	N/A	SS1054 should be allocated.	Site not considered suitable through the SHELAA process.
Henley	N/A (SS0171)	Objections include:	Site is not considered suitable for allocation.
Hessett	N/A (SS0678)	Objections include:     Landscape impact;     Detrimental impact on character; of the area;     Heritage landscape.	Site granted planning permission.
Hoxne	N/A	SS0043, SS0044, SS0045 and SS1236 should be allocated in the JLP.	Sites not considered suitable through the SHELAA process.
Hoxne – Low Street	N/A	Object to settlement boundary being extended to the south-eastern edge from the 1998 Local Plan.	Settlement boundary has been extended to meet the built form of the settlement.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Hunston	N/A (SS0815)	Objections include:	Site not considered suitable for allocation due to impact on heritage assets.
Laxfield	N/A (SS0069)	Objections include:	Site granted planning permission.
Mendham - Church	N/A	Objections include:      Visual and sound impacts;     Highways concerns;     Wildlife impact;     Impact on school and nursery     If it is included then boundary should be expanded further north.	Site granted planning permission. Expanding settlement boundary further is not considered appropriate.
Mendlesham	LA073	Site should be allocated for a larger number of dwellings in line with community aspirations.	Larger site is considered suitable for allocation.
Mendlesham	LA074	Objections include:	Site is not considered suitable for allocation.
Mendlesham	N/A	SS0063 and SS0784 should be allocated within the JLP.	Site not considered suitable through the SHELAA process.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Mendlesham Green	N/A	Settlement boundary should exclude playing fields and include land east of Mendlesham Road.	Playing fields have been excluded. Not considered suitable to include land east of Mendlesham Road.
Metfield	N/A (SS0863)	Objections include:	Site is considered to be well related to the settlement and suitable for allocation. Other sites not considered suitable through the SHELAA process.
Needham Market	LA031	Objections include:	Site granted planning permission.
Needham Market	LA032	Objections include:  • Flood risk;  • Heritage impact;	Site granted planning permission.
Needham Market	N/A	Some support was received for the level of growth proposed. Alternatively, SS1070 and SS1141 should be allocated.	The Infrastructure Delivery Plan has identified limited primary school capacity for further growth. SS1141 not considered suitable through the SHELAA process.
Norton	N/A	SS0421 should be allocated.	Site not considered suitable through the SHELAA process.
Oakley	N/A (SS0542 & SS1011)	No justification for inclusion, would represent unsustainable location for development.	Sites are considered to be well related to the settlement and suitable for allocation to meet overall District needs and promote rural vitality.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Palgrave	N/A	General support for settlement boundary. Objection received to site SS0734 not being allocated.	Site not considered suitable through the SHELAA process.
Pettaugh	N/A	<ul> <li>Objections include:</li> <li>Unreasonable, improper and arbitrary change</li> <li>Result in unsustainable development</li> </ul>	Site is considered suitable for allocation in line with the spatial distribution, infrastructure capacity and a range of constraints.
Rattlesden	N/A	Some support for settlement boundary. Objection as site SS1117 should be allocated.	Site not considered suitable through the SHELAA process.
Redgrave	N/A (SS0818)	Objections include:	Site granted planning permission.
Redgrave	N/A	SS0486 – Site should be allocated.	Site not considered suitable through the SHELAA process.
Redlingfield	N/A	Request to expand settlement boundary to include dwellings to the east, and barns to the west.	Considered that the settlement boundary is appropriate and has been drawn in a consistent manner across the Districts.
Somersham	N/A	Request to include rear garden of property off Mill Lane within the settlement boundary.	Considered that it is not appropriate to include this area within the settlement boundary.
Stonham Aspal	LA076	Objections include:	Site granted planning permission.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Stowmarket	LA035	Objections include:     Flood risk;     Heritage impact.  Policy should require (SCC):     Archaeological assessment     Flood risk assessment     Retain public rights of way     Footway improvements     Developer to test potential resources on the site to identify if prior extraction or use of the mineral on site is appropriate	Site is a long standing allocation, with an approved development framework in place to guide development. Policy amendments suggested by SCC have been incorporated into the policy.
Stowmarket	LA036	Objections include:	Part of the site has been granted planning permission. Policy amendments suggested by SCC have been incorporated into policy. Flood risk assessment is dealt with through the relevant Draft JLP policies / Strategic Flood Risk Assessment (SFRA).

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Stowmarket	LA044	Objections include:     • Flood risk     • Heritage impact. Some support, in principle of site.	The Draft JLP has been informed by a Strategic Flood Risk Assessment and heritage assessments.
Stowmarket	N/A	Land at Poplar Hill should be allocated as Local Green Space. Alternatively, site should be allocated for residential development.	Site is not considered suitable through the SHELAA process and the Draft JLP does not seek to allocate Local Green Spaces.
Stowmarket	N/A	Land to the north of Chilton Woods allocation (LA034) and site SS0694 to the south of Stowmarket should be allocated	Sites were not considered suitable through the SHELAA process.
Stowupland	LA078	Objections include:      Loss of high quality agricultural land;     Not in Stowupland Neighbourhood Plan;     Infrastructure capacity;     Highway concerns;     Heritage impact	Level of growth proposed is considered acceptable in line with the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP. Site subject to detailed HIA assessment, which has informed the site allocation process.
Stowupland	LA079	<ul> <li>Objections include:         <ul> <li>Loss of high quality agricultural land</li> <li>Site includes an area of Local Green Space (Thradstones Meadow)</li> <li>Not in Stowupland Neighbourhood Plan</li> <li>Poorly related to existing or new development</li> <li>Heritage impact;</li> </ul> </li> </ul>	Site is not considered suitable for allocation.
Stowupland	LA100	Objections include:	Site granted planning permission.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
		<ul> <li>Disproportionate development;</li> <li>Significant landscaped gap needs to be maintained between development and A14</li> <li>Highways concerns;</li> <li>Heritage impact;</li> </ul>	
Stradbroke	LA080	Objections include:  • Heritage impact;	Site is allocated within the Stradbroke Neighbourhood Plan.
Stradbroke	LA082	Objections include:  • Heritage impact;	Site is allocated within the Stradbroke Neighbourhood Plan.
Stradbroke	LA083	Objections include:  • Heritage impact;	Site is allocated within the Stradbroke Neighbourhood Plan.
Thorndon	N/A	Request to exclude two areas from the settlement boundary and include three new areas. Some support was received for the settlement boundary.	Considered that the settlement boundary is appropriate, and has been drawn in a consistent manner across the Districts.
Thornham Magna	N/A	Object to settlement boundary expansion to the east of The Street.	Area has been removed from the settlement boundary.
Thurston	LA084	Heritage impact.	Site granted planning permission.
Thurston	LA086	Objections include:  • Heritage impact;	Site granted planning permission.
Thurston	LA087	Objections include:	Site granted planning permission.
Thurston	LA088	Heritage impact	Site granted planning permission.
Thurston	LA089	Heritage impact	Site subject to detailed Heritage Impact Assessment (HIA) which has informed the Draft JLP.
Thurston	LA090	Heritage impact	Site granted planning permission.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Walsham-le- Willows	N/A	Settlement boundary around Rookery Lane does not follow property boundaries.	Settlement boundary has been amended to incorporate this recommendation.
Wattisfield	N/A	Settlement boundary should exclude listed buildings to the south-east of the settlement.	Considered that the settlement boundary is appropriate and has been drawn in a consistent manner across the Districts.
Wattisham Airfield	N/A	SS0613 should be allocated.	Site not considered suitable through the SHELAA process.
Westhorpe	N/A (SS0084)	Objections include:	Level of growth proposed is considered acceptable in line with the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP. Heritage assessments have informed the Draft JLP.
Westhorpe	N/A (SS0738)	Objections include:	Site not considered suitable for allocation.
Wetherden	N/A	More growth should be attributed to the village.	No suitable, achievable or deliverable sites have been identified. There may be opportunities for some growth outside of the plan making process.
Wetheringsett- Cum-Brockford	N/A	Site SS1133 should be allocated.	Site not considered suitable through SHELAA process.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Weybread	N/A	Draft JLP should allow smaller settlement to thrive and bring new blood to the community.	The Draft JLP allocates two small sites for development in Weybread, intended to promote rural vitality.
Whitton	LA102	Site should be expanded to the north. Some heritage concerns.	Site granted planning permission. Larger site area not considered suitable through the SHELAA process.
Wickham Skeith / Wickham Street	N/A	<ul> <li>3 areas proposed for inclusion in the settlement boundary:</li> <li>Land east of Grange Road;</li> <li>Land west of Grange Road;</li> <li>Land east of The Broadway</li> </ul>	An area to the west of Grange Road has been included in the settlement boundary. The two other areas are not considered suitable for inclusion in the settlement boundary, in order to take a consistent approach across the Districts.
Wilby	N/A	Objections include:  Site is physically separated from existing development;  Includes views valued by the community;  Incompatible with emerging Wilby NP;  Impact on settlement character;  Contains electricity pylons and sewage treatment works;	Site is not considered suitable for allocation within the Draft JLP.
Wilby – Russel's Green	N/A	Object to the provision of a new settlement boundary.	Settlement boundary has been provided in a consistent manner across the Districts.
Woolpit	LA093	Heritage impact. Expanded site being promoted by developers.	Site granted planning permission. Expanded site not considered suitable through the SHELAA process.

Settlement	JLP Site Ref	Main issues raised during consultation (2019)	How this has been taken into account in next document iteration
Woolpit	LA095	Objections include:     Highways impact;     Disproportionate development;     Heritage impact;     Site identified as Open Space in Neighbourhood Plan;     Not suitable for children from Elmswell to access the site;     Infrastructure capacity     Loss of agricultural land;	Level of growth proposed is considered acceptable in line with the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP. Site subject to detailed HIA assessment, which has informed the site allocation process.
Woolpit	LA096	Objections include:	Site is not considered suitable for allocation in the Draft JLP.
Woolpit	LA097	Objections include:      Highways impact;     Disproportionate development / not in Neighbourhood Plan     Poor access to services and facilities;	Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) and transport modelling work has informed the Draft JLP. Level of growth is deemed acceptable in line with the need to meet District wide housing need.
Woolpit	N/A	Object to extension of Lawn Farm Employment area.	Site granted planning permission.
Wortham – Long Green	N/A	Common land at the centre of the village should be identified as open space.	This change has been incorporated into the Draft JLP.
Wortham	N/A	Object to settlement boundary expansion to the east of the settlement.	Settlement boundary has been expanded to include a granted planning permission.
Yaxley	N/A	Objections include:  • Site is away from mains drainage	The suitability of water / sewage disposal would be assessed through a planning application.

Settlement	JLP Site	Main issues raised during consultation	How this has been taken into account in next
	Ref	(2019)	document iteration
Yaxley	N/A	Objections include:	Level of growth is considered acceptable in line with the availability and deliverability of sites, the spatial distribution, infrastructure capacity and a range of constraints. Infrastructure Delivery Plan (IDP) and consultation with relevant service providers (including the Local Highway Authority) has informed the Draft JLP.

#### Babergh and Mid Suffolk Joint Local Plan - Pre-Submission (Regulation 19) November 2020

- 17. From **12**<sup>th</sup> **November 2020 to 24th December 2020**, the Councils consulted on the Babergh and Mid Suffolk Joint Local Plan Pre-Submission Document (Regulation 19 Stage).
- 18. The Regulation 19 Consultation was held whilst public health measures were in place due to the Coronavirus (Covid-19) pandemic. The Councils produced an Addendum to the Babergh and Mid Suffolk Statement of Community Involvement (SCI)<sup>5</sup>, which set out how the Councils would conduct planning consultations, whilst public health measures were in place. In line with the temporary amendments to Regulations 35 & 36 of the Town and Country Planning (Local Planning) (England) Regulations 2012, documents were not available for inspection at premises (such as the Council offices), instead documents were made available for inspection online on the Councils' websites. The Councils continued to make hard copies of documents available on request at a cost set out in section 2.1 of the Statement of Community Involvement<sup>6</sup>. The Councils ran engagement sessions with Town and Parish Councils and Neighbourhood Plan groups through online platforms.
- 19. Representations were accepted in accordance with the Councils Statement of Representations Procedure. A total of **1681** representations (**1304 objections**) were received during the consultation from **356 respondents**. 42% of representations were made using the Councils Joint Local Plan consultation portal (online), 58% were made via email and 0.12% were made by letter (note: percentages do not equal 100% due to the rounding of figures). Copies of all duly made representations received during the Regulation 19 consultation are available in the Core Document Library.

<sup>&</sup>lt;sup>5</sup> Document A13 in the Core Document Library

<sup>&</sup>lt;sup>6</sup> Document A12 in the Core Document Library

<sup>&</sup>lt;sup>7</sup> Document B12 in the Core Document Library

### (Reg 19) Summary of the main issues raised during the 2020 JLP consultation

### Vision, Objectives and Duty to Cooperate

Topic	Main issues raised during consultation (2020)
Vision and Objectives	<ol> <li>Support for the Plan's Visions and Objectives, in particular around new housing and economic provision.</li> <li>The Plan's Vision and Objectives should be stronger on environmental protections, heritage features and the rural nature of the two districts.</li> <li>The Plan needs to embed COVID19 future recovery aspirations into the Visions and Objectives.</li> <li>The Plan's Vision and Objectives should acknowledge the significant role of Ipswich and the growth attributed to the Ipswich Fringe.</li> </ol>
Duty to Cooperate	<ol> <li>Support for identifying and cooperating on relevant strategic and cross boundary issues with designated bodies.</li> <li>Despite unmet housing need not currently being identified, the Councils should provide policy mechanisms to deal with unmet need should they emerge.</li> <li>The Plan does not identify Ipswich Strategic Planning Area wide growth objectives.</li> <li>Suffolk Constabulary should be added to key Duty to Cooperate partners and added to relevant infrastructure sections of the Plan.</li> </ol>

#### **Strategic Policies (SP01 to SP10)**

Policy	Main issues raised during consultation (2020)
SP01 - Housing Needs	<ol> <li>Amendment to supporting text para 6.01 - Increase housing requirement due to unmet need from Ipswich Borough Council and include mechanism to respond rapidly.</li> <li>Increase housing requirement to ensure affordable housing needs are met.</li> <li>Increase housing requirement in line with SHMA Part 2 Update and take account of growth strategies &amp; strategic infrastructure improvements, to support economic slowdown.</li> <li>The housing requirement should be increased to provide greater flexibility and aspiration.</li> <li>The standard methodology for calculating housing need not applied correctly to early Plan years.</li> <li>Housing requirement and Plan period is supported.</li> <li>Housing requirement figure should be much less and based upon household projections.</li> <li>Support for importance of policy to provide right mix, type and size of new housing.</li> </ol>

Policy	Main issues raised during consultation (2020)
SP01 – Housing Needs Continued	<ol> <li>The policy is not clear what the mix, type and size of housing developments are required.</li> <li>Further growth should be allowed where Local Housing Needs surveys identify additional requirements.</li> <li>JLP Housing trajectory is unrealistic. No evidence of deliverable and developable sites is provided.</li> <li>Support that the housing trajectory has a strong land supply. This must be maintained throughout the JLP period.</li> <li>Delivering extant planning permissions is very important. Small/Medium sites near urban areas could help diversify supply.</li> </ol>
SP02 - Affordable Housing	<ol> <li>Referencing supporting text paras 7.02, 7.03 and 7.09 - incentivises urban sprawl/ does not meet composition of affordable needs.</li> <li>Uplift required to meet level of need.</li> <li>Approach not sufficiently flexible, 35% could be unviable, particularly in lower value or brownfield areas.</li> <li>Policy approach is supported as it makes provision for flexibility and deliverability / important flexibility does not result in under provision due to flexibility in policy/ may make too great allowances for viability.</li> <li>Policy approach lacks flexibility for off site provision.</li> <li>Potential for NP non conformity, if NPs have different thresholds.</li> <li>Support 35% (+) requirement &amp; support bungalow provision. Affordable houses should be prioritised for SP10 energy systems (i.e. affordable housing also to consider 'running' lifetime costs).</li> <li>Reference should be made to the Plan of Council Houses, not just rely on private sector. 50% should be sought as affordable on public sector land.</li> <li>The 0.5Ha ref requires modification to specifically refer to outline residential apps on sites of 0.5 or greater as would otherwise capture non major dev sites.</li> <li>Affordable provision should not be grouped on large sites, rather apportioned across site area.</li> <li>Policy should reference types of development from the viability evidence that are exempt from affordable housing contribution.</li> </ol>
SP03 – Settlement Hierarchy	<ol> <li>Flexibility should be added to policy, including allowing for edge of settlement sites, well related brownfield sites and infrastructure provision in isolated locations. Settlement boundaries should not be used to refuse otherwise sustainable development.</li> <li>Amendment to para 3) - Reference to isolated locations should be removed as this infers that development outside of settlement boundaries not in isolated locations will be permitted.</li> <li>Amendment para 3) Need to clarify what is meant by 'exceptional circumstances.'</li> <li>Amendment to para 1) - Restricting coalescence should be removed, and/or 'visual coalescence' is too subjective.</li> <li>Reference to para 3) - Settlement boundaries are inadequate to meet overall housing need.</li> <li>Need a strategy for hinterland and hamlet villages, and clarity on links to Policy LP01.</li> </ol>

Policy	Main issues raised during consultation (2020)
SP03 – Settlement Hierarchy continued	<ol> <li>Criteria in para 4 are covered by Development Management policies, not justified to repeat here.</li> <li>Heritage or residential amenity not mentioned in Para 4. Remove material consideration. Should include considerations of heritage, residential amenity and design policies/guidance in NPs.</li> </ol>
	9. The following settlements should be higher in the settlement hierarchy: Chelmondiston, Elmswell, Great Waldingfield, Hoxne, Mendlesham, Rattlesden, Wetherden.
	<ol> <li>The following settlements should be lower in the settlement hierarchy: Acton, Shotley, Sproughton.</li> <li>Need greater clarity on what constitutes Ipswich Fringe area, and why Ipswich Fringe settlements are also core villages etc.</li> </ol>
	<ul><li>12. Point thresholds used in settlement hierarchy needs to be justified.</li><li>13. Reference to supporting text para 8.03 - Scoring system fails to recognise the capacity, relevance, viability and permanence of services.</li></ul>
	<ul><li>14. Hierarchy should be flexible to review changes in the service provision of settlements.</li><li>15. Settlement hierarchy tables should identify Market Towns and A12/A14 settlements together as the second category of settlements.</li></ul>
	16. Too much emphasis on settlement hierarchy in para 1, should be a more balanced approach.
SP04 – Spatial Distribution	<ol> <li>Support for the Plan increasing the supply and range of urban and rural housing proposed to meet needs.</li> <li>Support for the proportion of growth in market towns and urban areas.</li> </ol>
	<ol> <li>Increase proportion of housing being allocated to Ipswich Fringe, Market Towns and Urban Areas and Core Villages</li> <li>Reduce proportion of growth on A14 corridor villages, increasing growth in A14 towns and communities along the A140 route.</li> </ol>
	5. Increase proportion of housing being allocated within the Mid Suffolk Ipswich Fringe.
	6. Reduce proportion of growth in the Ipswich Fringe and increase in the rural areas.
	<ol> <li>There should be a greater spread of growth across all Mid Suffolk Core Villages.</li> <li>Increase the proportion of growth for Hamlet Villages.</li> </ol>
	9. A new settlement for Mid Suffolk is required at the outset of the JLP.
	10. A new Garden Village between Hadleigh and Ipswich should be included in the Plan. 11. Object to 20% buffer as it is not justified.
	12. Support 20% buffer.
	13. A greater supply of housing should be found to ensure the housing needs requirements are met. 14. The Plan should contain reserve sites for each settlement to maintain delivery.
	15. Amend Policy SP04 to state that LS01 sites should be used as an additional supply buffer where Neighbourhood Plans to not deliver.

Policy	Main issues raised during consultation (2020)
SP04 – Spatial Distribution continued	<ol> <li>Increase in housing numbers and sites proposed for: Bacton, Bildeston, Botesdale, Boxford, Bramford, Chelmondiston, Debenham, Great Blakenham, Great Waldingfield, Hadleigh, Haughley, Holbrook, Long Melford, Mendlesham, Needham Market, Redgrave, Stowmarket, Stowupland, Thurston, Walsham-le-Willows, Wetheringsett-cum-Brockford, Whatfield, Whitton.</li> <li>Housing requirements in Sproughton, Lawshall and Hartest should be reduced following change in local circumstances.</li> <li>For Mid Suffolk Core Villages, the total homes in policy SP04 and Table 04 is inconsistent.</li> <li>More allocations should have mixed uses included to offset the need to travel further distances for services and facilities.</li> <li>The Plan needs to be clear how the volume of planning permissions granted after the base date have been taken into account.</li> <li>The assumed windfall allowance is not justified - representations for both higher and lower.</li> </ol>
SP05 – Employment Land	<ol> <li>Should apply to all existing employment sites. Approach is overly restrictive.</li> <li>Protect high quality sites &amp; identify new land and allow other sites to be redeveloped for alternative uses.</li> <li>Amendment to supporting text para 9.14 - add reference to quantified jobs forecast and minimum employment land requirements.</li> <li>Para 6 is unduly restrictive / or 6 should apply to BOTH new and existing sites with priority to safeguarding existing sites.</li> <li>Amendment to para 4 - remove use class reference on full, single or flexible use.</li> <li>Amendment to supporting text para 9.18 - Mill Lane, Stowmarket (Gateway 14) - extend site to align with EZ and remove text regarding area of developable land.</li> <li>Lion Barns site (Needham Market) &amp; Eye Airfield site - transport &amp; gas transmission line impacts.</li> <li>Policy modification proposed to address the impacts of poultry uses around Eye Airfield and surrounding area.</li> <li>Wherstead - support &amp; expand the current site allocation and refer to map Enterprise Zone designations.</li> <li>Amendment to para 1 b) and 6 d) - Chilton -amend name of site &amp; heritage consideration to having regard.</li> <li>Amendment to 1f) - deallocate part of Lady Lane (Hadleigh) allocation at boundary.</li> </ol>
SP06 – Retail and Town Centre Use	<ol> <li>Conflicts with SP10 as it is not a strategy and lacks approach on issues such as access to retail and leisure, sustainable transport, the types of retail, tourism and leisure facilities and green or conservation policy.</li> <li>Extend Stowmarket boundary to include submitted sites - Land between Navigation Approach, Gipping Way &amp; Iron Foundry Road.</li> <li>There are no defined town centre area boundaries on the policies maps - they are separate in appendix 04 but only cover Hadleigh, Sudbury, Stowmarket but exclude Needham Market, Eye and Debenham.</li> </ol>

Policy	Main issues raised during consultation (2020)
SP06 – Retail and Town Centre uses - continued	4. Eye - town centre boundary should be amended to be consistent with Eye Neighbourhood Plan aspiration for retail on site beyond defined boundary to negate need for sequential assessment.
SP07 - Tourism	<ol> <li>No strategy to support tourism in Suffolk.</li> <li>Modification proposed to include considerations of impacts on tourist economy (positive or negative) in planning balance.</li> </ol>
SP08 – Strategic Infrastructure Provision	<ol> <li>Policy wording suggestion to include Rail provision.</li> <li>The policy should require a commitment to funding the ISPA Transport Mitigation Strategy, acknowledge that key infrastructure is required within the borough of Ipswich and achieve at least 10% transport modal shift.</li> <li>Objection to the strategy to deliver a new primary school in Woolpit area.</li> <li>Regulation 122 of the CIL test should be followed.</li> <li>Policy wording amendment referring to Para 2 to include the words "subject to viability".</li> <li>Infrastructure provision should be frontloaded before development.</li> <li>Suffolk Constabulary require specific reference to police infrastructure within policies and site allocations.</li> <li>The policy is considered in conflict with SP05, LP24 and LA099 concerning intensive poultry units serving Cranswick.</li> </ol>
SP09 – Enhancement and Management of the Environment	<ol> <li>Policy amendment to require HRA under all relevant circumstances.</li> <li>Need to improve baseline data and availability of data to inform JLP.</li> <li>A policy requiring appropriate payment of the Suffolk Coast RAMS tariff should be embedded into the Plan.</li> <li>Clarify Zone of Influence and modify map to include Ipswich and East Suffolk.</li> <li>Biodiversity net gain should be targeted to locally relevant, declining habitats and species and which aim to increase connectivity within the wider landscape. A commitment to have both sought and published reports, on specific clearly important areas.</li> <li>Caveat policy for where development proposals cannot protect the networks of habitats, suitable mitigation should be part of the scheme.</li> <li>Policy amendment to para 3 to ensure relevant biodiversity projects are incorporated.</li> <li>Policy amendment to para 3 to clarify the approach.</li> </ol>
SP10 – Climate Change	<ol> <li>Include a statement on what is expected on large developments for climate change.</li> <li>Require developers to build sustainable carbon-neutral housing.</li> <li>State measures for carbon storage &amp; map carbon sinks.</li> <li>Provide more local guidance in terms of the expectations of the development industry in respect of climate change.</li> </ol>

# **Local Policies (LP01 to LP35)**

Policy	Main issues raised during consultation (2020)	
LP01 – Windfall	<ol> <li>Support principle of enabling housing in hamlets and clusters.</li> </ol>	
Development in	2. Reword para 1 as it should only be encouraged to convert derelict buildings and improve historic landscape.	
hamlets and	<ol><li>Policy should be strengthened to avoid harm on heritage assets, landscapes and protected trees.</li></ol>	
dwelling clusters	4. Should apply to sites 'well related' to dwelling clusters and / or a defined hamlet.	
	<ol><li>Policy should include provision for PDL in countryside to be developed.</li></ol>	
	6. Policy should not require all criteria. Community views should be given greater weight add 'in some	
	circumstances'.	
	7. Policy should not be restricted to single or pair of dwellings.	
	8. Definition of a 'defined clusters' should be amended. 10 dwellings threshold considered overly restrictive.	
	9. Policy is not positively prepared and should provide greater certainty.	
	10. Clarity required over how cumulative impact will be considered.	
	11. Clarity defining infill.	
	12. Impact on AoNB & biodiversity or geodiversity must be fully addressed and mitigated.	
	13. Clarity is required regarding the fullest contribution to mitigation of climate change.	
	14. Policy should require M4(2) contributions.	
LP02 - Residential	1. Policy should be stronger on sustainable energy requirements and require proposals to improve the energy	
Annexes	performance of the entire dwelling.	
	1	
LP03 - Residential	Proposals should improve the energy performance of the entire dwellings.	
Extensions and	2. Policy should be extended to consider conversion of agricultural barns.	
Conversions	, and the second	
LP04 - Replacement	1. Policy lacks clarity as it depends on policy LP03. Delete 1e).	
Dwellings in the	2. Part 1d - the criteria regarding increasing number of dwellings on the plot needs clarity.	
Countryside		
LP05 - Replacement	Policy should explicitly resist back-land development and/or the loss of garden land.	
Dwellings and	Policy needs consistent terminology regarding heritage assets.	
Additional Dwellings		
on Sub-Divided		
Plots Within		
Settlement		
Boundaries		

Policy	Main issues raised during consultation (2020)
LP06 - Mix and Type	No justification/evidence for 50% M4(2) standards.
of Composition	2. Request viability clause added into M4(2) requirement.
	3. Alternative M4(2) thresholds: apply to all schemes regardless of size; require 100% M4(2); 3% M4(3); 100% of
	bungalows to M4(3) standard.
	4. Affordable housing requirement should not be repeated here. Also contains no viability clause as set out in other policies.
	5. Insufficient flexibility. Regard must be given to viability, market signals and local circumstances in establishing housing mix.
	6. Clarity requested if Housing Needs Assessments undertaken as part of Neighbourhood Plan are included.
	7. Object to removal of Permitted Development rights for bungalows.
	8. Reference to supported and special needs housing should be removed from policy as it has its own policy
	(LP07).
LP07 – Supported	1. Supported and special needs housing is needed in the area. Consideration should be given to the capacity of
and Special Needs	the Primary Care Networks.
Housing	JLP should allocate sites for specialist housing accommodation.
	<ol><li>Edge of settlement sites should be allowed subject to criteria, to allow the JLP to meet needs.</li></ol>
	4. Neighbourhood Plans should be able to set their own housing mix.
	5. Developments should be able to depart from Neighbourhood Plan housing mixes, if supported by sales and marketing information.
	6. M4(2) requirement is inconsistent with LP06.
	7. Should require 5% of dwellings to meet M4(3) requirement.
	8. Planning conditions should be used to remove permitted development rights for bungalows, not planning obligations/legal agreements.
	9. Object to removing permitted development rights on bungalows.
	10. Settlement types set out in 1b should replicate the settlement hierarchy.
LP08 – Affordable	No need for two JLP policies addressing affordable housing.
Housing	<ol> <li>No need for two JLP policies addressing anordable nodsing.</li> <li>Policy should state there may be circumstances where the 35% affordable is not achievable.</li> </ol>
liousing	3. Delete last sentence of para 13.39 for consistency with NPPF para 64.
	4. JLP policies need to refer to the tenure split of affordable housing.
	5. Policy should ensure there is no conflict with the Government's requirement of at least 10% of new homes as
	affordable.

P08 - Affordable   Housing - Continued	Policy	Main issues raised during consultation (2020)
The Requiring financial appraisal to justify market housing on rural exception sites is contrary to viability study. Up to 35% market housing does not offer enough flexibility.   Affordable housing should be spread evenly across the site.   Policy should set out minimum/maximum number of affordable units to be grouped together.   Policy should set out minimum/maximum number of affordable units to be grouped together.   Policy should set out minimum/maximum number of affordable bousing delivery.		
to 35% market housing does not offer enough flexibility.  8. Affordable housing should be spread evenly across the site.  9. Policy should set out minimum/maximum number of affordable units to be grouped together.  10. Part 1c) - the approach needs further clarity regarding cumulative assessment and requirements.  11. No definition of exceptional circumstances for off-site affordable housing delivery.  LP09 – Provision for Gypsy and Traveller and Traveller and Traveller 2. Accommodation Needs Assessment underestimates needs and does not consider the Duty to Cooperate.  3. The evidenced supply of sites is not robust.  4. Policy should make allowance for those that fall outside of the Planning Policy for Traveller Sites definition.  5. Policy should be more flexible and positive and allocate sites for permanent and transit accommodation.  6. All large housing developments should provide land for Gypsy and Traveller accommodation to improve social integration.  LP10 – Moorings, Marinas and Houseboats  1. Object to principle - all houseboats should be removed and are in River Orwell illegally.  2. To meet need, policy approach should be more flexible. Suggest deletion of (2) 'within the defined moorings and marinas' and apply criteria to any relevant location.  LP11 – Self-Build and Custom-Build  1. Policy should allow edge of settlement and outside settlement boundary self-build plots subject to criteria to meet need.  2. Plan needs to demonstrate how it meets identified need for self-build plots.  3. Policy should be stronger on sustainable energy requirements.  4. Policy should be stronger on sustainable energy requirements.  5. No definition for what is "employment use."  5. Drafted policy defeats purpose of Class E.  6. Should not create a presumption in favour of small scale employment use.	Housing - Continued	
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4. Should not create a presumption in favour of small scale employment use.		
5. Wording about predominately residential curtilage needs 'within' inserted.		· · · · · · · · · · · · · · · · · · ·
6. Add 4. Live/work units will be supported where they do not conflict with other policies.		
7. Clarification needed on the use of 'significant'. How will this be assessed?		• • • • • • • • • • • • • • • • • • • •

Policy	Main issues raised during consultation (2020)
LP12 – Employment	8. Add further criteria to promote flexibility of employment provision consistent the geography of Ipswich Fringe,
Development	Market Towns or the A12/A14 corridors and subject to impacts upon the environment and residential amenity.
continued	
LP13 – Safeguarding	1. Para 14.06 refers to inherently unsuitable, but this is no longer included in para 2 of the policy.
Economic	2. Policy needs greater recognition of flexibility for other use types, e.g. retail etc.
Opportunities	3. Para 1 - Needs definition of 'business' 'commercial' or 'employment' activity & sites.
	4. Para 2 - the minimum period of marketing should be 12 months for larger schemes.
	5. Recommend deletion of part (3) of the policy concerning relocation which would result in full or partial loss.
	6. Para 3 - Delete the requirement for contributions to help off-set loss of employment land. Not considered justified and needs clarity of calculation.
	7. Not clear whether an application under paragraph 3 of the policy must also comply with paragraph 2.
LP14 – Town Centre	1. Add Para 4 - An element of small affordable retail units will be required on developments exceeding 1000m2.
and Retail	2. Clarification is required, as no specific town centre boundaries are defined for Needham Market, Eye and
	Debenham.
	3. Lower retain threshold.
	4. Part 2a) should include clarity to support Main Town Centre uses.
LP15 – Tourism and	1. Delete 1a) to g) - should not simply be a tick list which must be satisfied as overall benefit is to achieve further
Leisure	development.
	2. delete criteria e and f.
	3. Add criteria to enable provision for residential accommodation for financial viability & or where it enables new
	and flexible working practices such as live/work units.
LP16 - Countryside	n/a
Tourist	
Accommodation	
LP17 -	<ol> <li>Object - strategic and housing policies do not give priority to the reuse of brownfield land.</li> </ol>
Environmental	<ol><li>Should be removed, as could be used as a barrier against sustainable greenfield sites.</li></ol>
Protection	3. Policy should require more than a 'contribution' to making more efficient use or reuse of existing resources.
	4. Light pollution - Saved BDC Policy EN22 should be reinstated. Current policy fails to reflect NPPF para 180.
	5. Should be more explicit that impact may be within Ipswich, and that air quality assessments should consider
	AQMAs within Ipswich.

Policy	Main issues raised during consultation (2020)				
LP17 – Environmental	6. Reference to 'National and International Standards' is required through a footnote or reference.				
Protection continued	7. Remove requirement to 'enhance' groundwater, surface water features etc.				
	8. Policy should refer to the requirement for waste management plans for new developments and include				
	consideration of cumulative impacts.				
	9. would like to see proactive measures to ensure that legally binding targets on biodiversity, air quality, water,				
	and resource and waste efficiency are not only achievable but also can be surpassed.				
LD40 Disdissesites	A. Net experietes twith NDDE as it places as beginning behittete as the first star.				
LP18 – Biodiversity	Not consistent with NPPF as it places enhancing habitats as the first step.				
and Geodiversity	2. For clarity policy should state that locally designated sites such as County Wildlife Sites are included				
	3. County Wildlife Sites should be mapped and safeguarded.				
	<ol> <li>Request explicit reference to the need for biodiversity enhancements to be targeted at locally relevant, declining habitats and species.</li> </ol>				
	5. Enhancements for biodiversity should be on the basis of an up to date Ecological Appraisal and relate to the				
	site, rather than scale of development.				
	6. Remove requirement for 10% biodiversity net gain, as Environment Bill has not passed through Parliament.				
	Would be NPPF compliant if specific percentage requirement was removed.				
	7. Net gain must be set at 20%.				
	8. 10% net gain will not alone justify greenfield developments and should be part of a hierarchy of safeguards.				
	<ol><li>Give clear indication as what potential uses of the Metric could be and make clear that off-site compensation could never be the main option considered.</li></ol>				
	10. Off-site offsetting must be situated close to the development site.				
	11. need to state that 'biodiversity offsetting' will be an exceptional step.				
	12. Remove part 2f of the policy, as this is addressed in Part 3 of the policy.				
	13. Need to proactively map protected areas, wildlife links and stepping stones.				
	14. Insufficient detail about how to ensure environmental corridors will work and should be implemented at every				
	opportunity.				
	15. enhancement and management of local networks are likely to fall into multiple landowners, therefore, schemes				
	should only do so where possible. 'Local networks of biodiversity' not defined in plan.				
	16. Plan needs to be clear that any habitat found to have sensitive species must be left undisturbed and protected.				
LP19 - Landscape	Modification to background text suggested to strengthen requirements.				
	2. JLP should retain Visually Important Open Spaces and Special Landscape Area designations, as it is unclear				
	how non designation led approach will be delivered and what criteria will be applied.				
	<ol><li>Policy should include reference to local landscape designations in adopted NPs.</li></ol>				

Policy	Main issues raised during consultation (2020)
LP19 - Landscape continued	<ol> <li>Amend to require a commitment to implement specific landscape mitigation measures identified in the LVIA at the earliest possible opportunity.</li> </ol>
LP20 – Area of Outstanding Natural Beauty	<ol> <li>Modification requested to background text to refer to Valued Landscapes within AONB Project Areas</li> <li>Policy should be more restrictive and include AONB Project Areas.</li> <li>Major development should normally be refused in AONBs, as per NPPF.</li> <li>Require planning applications to be supported by a Landscape and Visual Impact Assessment that identifies the impact of the development on the wider landscape and the Area of Outstanding Natural Beauty.</li> <li>Modification requested to conserve the distinctiveness of the AONB and reference to AONB Management Plans</li> </ol>
LP21 – The Historic Environment	<ol> <li>Conservation areas should be specifically mentioned.</li> <li>Policy should refer to the identification of non-designated heritage assets in NPs.</li> <li>Modification requested to clarify that different weight to be granted to impacts on designated and non-designated assets - as per NPPF.</li> <li>Para 1 - depending on the nature of the works/development proposed should be removed.</li> <li>Criteria set for heritage statements is excessive and above NPPF requirements.</li> <li>Should be expanded to cover full extent of NPPF para 192.</li> <li>Re-use of heritage assets should not require compliance with relevant JLP policies.</li> <li>Policy should acknowledge that in certain cases, redevelopment within the setting of a heritage asset can be beneficial to the asset and will be supported.</li> <li>Policy is too subjective, provides no locally specific guidance. Needs to respect community values and identify the districts intentions for heritage preservation.</li> </ol>
LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses	Policy should require significant highway impacts to be mitigated and ensure test of highway acceptability is in line with NPPF.
LP23 – Agricultural Land to Residential Garden Land	<ol> <li>Policy is unnecessarily onerous and not justified. Should be simplified, with a criteria based policy, taking into account the following considerations: size and scale, the aspect and location of site, presence of landscape features, the extent to which high quality agricultural land would be taken out of productive use.</li> </ol>

Policy	Main issues raised during consultation (2020)
LP24 – New	1. Amend - new agricultural development connected with the poultry industry is that it will follow transport evidence
Agricultural/Rural	modelled capacity.
Buildings in the	<ol><li>Policy should be amended to provide greater clarity as to what evidence and justification is required.</li></ol>
Countryside	3. "significant levels of traffic" is not defined - The policy needs to positively address the issue through measures
	which manage and mitigate impacts (including cumulative impacts).
	4. Does not provide an adequate means to control the development of an increasing number of Intensive Poultry
	Units.
	5. Does not address cumulative or in combination concerns regarding proliferation and over concentration of IPUs
	and the resultant growth of HGV traffic on an inadequate rural road network.
LP25 – Sustainable	Recommended rewording for para 15.53 to acknowledge expiry of zonal charge Anglian Water levy.
Construction and	Amend wording to say "encouraged" not "required."
Design	3. Basic renewable energy generation systems should be mandatory, not just encouraged.
3	4. Not considered appropriate for the Councils to set different targets or policies outside of the Building Regs.
	5. The policy should require compliance with Future Homes Standard and reject gas heating.
	6. The concept of 'consequential improvement' should be included.
	7. Does not go far enough to achieve the vision of a carbon neutral borough by 2030.
	8. Amend para 2f to add - High embodied carbon (e.g. timber) will be encouraged.
	9. "Policy part 3 should be reduced to apply to 10 or more dwellings and to comply with current Building Regs on
	reduction of C02 emissions, water and energy efficiency standards."
	10. Object to the requirements in this policy to deliver energy and water savings above current Building Regulations without adequate justification.
	11. Not clear who is responsible for encouraging the water efficiency target and further clarity should be provided.
	12. Clarification of water efficiency standard required.
	13. Policy amendment - remove para 6 and retain supporting text para 15.53.
	14. Criteria 3a) and 3b) to only be applicable to major development and reduce the standards being sort throughout the rest of the criteria.
	15. A full Sustainability Design and Construction Statement should not be required at the early stages of a planning application, where matters are reserved for future determination. The wording of the Policy should be amended to reflect this.
	16. Highest BREEAM standard should be required.
	17. Amend para 6 - Delete 'wherever feasible'.
	18. para 3c) needs to be split into two parts.

Policy	Main issues raised during consultation (2020)				
LP25 – Sustainable	19. A specific commitment should stipulate high quality fibre optic broadband as provision for any development.				
Construction and	Adequate provision for future development should also provide and empower citizens to participate in activ				
Design continued	travel.				
LP26 – Design and Residential Amenity	<ol> <li>NPs have design codes and policy should ensure these are used in determining planning applications. No recognition of NP's design work.</li> <li>Should encourage Design Codes, with larger schemes reviewed by an Independent Design Review Panel.</li> <li>No reference to enhancing the existing character and context.</li> <li>Consideration should be given to a requirement for dwellings to incorporate live/work spaces, to reduce the need to commute.</li> <li>If natural features such as trees/hedgerows are lost they should be replaced.</li> <li>2e - 'exceptional design' and 'sensitive area / landscape' need to be defined. Requiring developments of al scale to do this is onerous.</li> <li>No evidence to justify space standards.</li> <li>Clarity required on term 'where appropriate' in part 2 (k).</li> <li>M4(2) requirement is within other policies, not clear what schemes criteria would apply to.</li> </ol>				
	<ul><li>10. This policy offers more flexibility than LP06. This part should be retained and LP06 requirement removed.</li><li>11. Remove last sentence of part 3 of the policy as maintain and improve are two different requirements.</li></ul>				
LP27 – Energy	Remove part 2 of the policy.				
Sources, Storage and Distribution	<ol><li>Part 1, the current wording dealing with impact fails to consider avoidance of harm and therefore needs to be revised.</li></ol>				
LP28 – Water	Amend part 1 for clarification regarding appropriate water efficiency measures.				
resources and	2. Amend part 1 to not require conformity.				
infrastructure	3. Part 3 is not considered justified as it duplicates other legislation.				
LP29 – Flood Risk	4. Propose listing of specific recycling measures.				
and Vulnerability	<ol> <li>Remove reference to grey water recycling from point 7.</li> <li>Amend part 4 to include discussion with relevant drainage authority. Amend part 5 to delete considerations for cumulative impacts.</li> </ol>				
	3. Policy requires clarification for minor development and the LLFA.				
	<ol> <li>Policy amendment to part 3 to clarify avoiding and mitigating risks for SuDS.</li> <li>Overlap between LP29 and LA078 part IX Requests IX to be removed from LA078, no amendments to LP29 requested.</li> </ol>				

Policy	Main issues raised during consultation (2020)
LP30 - Designated	1. Plan should either identify Local Green Spaces or refer to Local Green Spaces in post examination or adopted
Open Spaces	NPs.
	2. Clarity is required regarding Council preference in paragraph 2 of the policy.
	Unclear how this policy interacts with CIL payments.
	4. Policy should acknowledge viability considerations will be taken into account in open space provision.
	<ol><li>Object to standards set out in Open Space Assessment, which are too onerous and complex.</li></ol>
	<ol><li>Policy lacks clarity, unclear what requirements a development should include. Requirements should be discussed and agreed at pre-application stage.</li></ol>
	7. Policy cannot require conformity with standards if they are not identified in the plan. Policy should only require development to have regard to the open space assessment.
	8. Open space deficit should be addressed through a Council Strategy not from new development.
LP31 – Services and	JLP should require shops are marketed for 1 year prior to conversion to a residential unit.
Facilities Within the	2. Remove the reference to 'valued' and replaced with "not needed or required."
Community	3. Include consideration of Assets of Community Value within part 3b of the policy.
LP32 – Safe,	1. Seeks reprioritisation of criteria a and b, and insert text to address cross boundary matters where appropriate.
Sustainable and	2. "Policy Part 3 needs more clarity regarding 'where relevant' aspect."
Active Transport	3. Amend part 4 to include linkage to services.
	4. Part 1 - Policy needs to identify what constitutes a 'significant increase in transport movements.'
	<ol><li>Amend part 2 to remove the requirement for maximising uptake.</li></ol>
	6. The policy requires greater emphasis on electric transport infrastructure and a greater coordination of bus and
	train networks to reduce the need for car usage in our rural communities.
	7. Part 3h) of the policy needs to make reference to cycle parking.
	8. Part 3i)- Delete requirement for electric vehicle changing points.
	9. Policy needs clarity with regard to requirements for parking provision (Part 3h).
LP33 – Manufacturing Infrastructure Provision	The IDP supporting LP33 needs clarity regarding the estimated infrastructure project costs.

Policy	Main issues raised during consultation (2020)
LP34 – Health and Education Provision	<ol> <li>Support, but would like part 2 to include health facilities. Ensuring that development near to health facilities does not compromise the ability for it to expand capacity (where possible) at appropriate times as instructed in the IDP.</li> <li>Policy wording should be amended to reference a need for there to be a clear demand for future expansion prior to protecting land adjacent to schools for the foreseeable future.</li> <li>Not necessary for the plan to contain a policy which inhibits the disposal and redevelopment of surplus school facilities, as there is already a robust legislative process to do so.</li> <li>Recommendation for deletion of sentence referring to the NPPF and pre-application advice, in Part 3 of the policy.</li> </ol>
LP35 – Developer Contributions and Planning Obligations	<ol> <li>Para 16.22 proposed amendments to clarify healthcare assessment are matched to proposed growth plans.</li> <li>Policy does not address NPPF para 34 requirements and instead relies on Part 4 - 'relevant documents endorsed by the council.</li> <li>Greater clarity over what contributions are expected from LS01 sites is required to make this policy more effective.</li> <li>Policy LP35 should make allowance for the viability of schemes to be considered.</li> </ol>

### Place Section - Babergh

### Babergh - Ipswich Fringe

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Belstead	LA005	Objection:
		Development of site should incorporate recommendations in Valued Landscape Report
Bramford	N/A	Lack of primary care facilities (health).
Copdock & Washbrook	LA008	Objections include:
		Heritage impact
		Impact on wildlife
		Disproportionate development

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Copdock and		Impact on character of the area
Washbrook (LA008)		Air quality
Continued		Highways concerns
		Infrastructure capacity
		Policy wording should:
		Require a Flood Risk assessment
		Require compliance with the Councils Heritage Impact Assessment
		Identify where financial contributions are required for services in Ipswich.
		Refer to the Copdock & Washbrook Neighbourhood Plan
		Support:
		Water mains reference
		• Water mains reference
Copdock & Washbrook	LA009	Objections include:
·		Not a neighbourhood plan site
		Unsustainable location
		Policy wording should:
	N1/A	Require a Flood Risk assessment
Sproughton	N/A	Objections include:
		No mention of primary school expansion
		Description of parish is inadequate
Computation	1.0040	Lack of primary care facilities (health)  Objections include:
Sproughton	LA012	Objections include:
		Contributions do not meet statutory tests     Water discharge
		<ul><li>Water discharge</li><li>Highways concerns</li></ul>
		School capacity
		Health facilities
		Air quality
		Does not include extant outline planning permission conditions
		Reduce to 75 dwellings
		• Neduce to 10 dwellings

Settlement	JLP Site Re	f Main issues raised during consultation (2020)
Sproughton LA012		Disproportionate development
Continued		Landscape impact
		Impact on character of the area
		Policy wording should:
		Clarity regarding water discharge
		Removal of criteria
Sproughton	LA013	Objections include:
oprosignion		Air quality
		Heritage
		Highways concerns
		Should not dilute planning conditions, standards or benefits
		Should not allate planning conditione, standards of sentente
		Policy wording should:
		<ul> <li>Identify where financial contributions are required for services in Ipswich.</li> </ul>
		Require compliance with the Councils Heritage Impact Assessment, include a concept
		diagram and require a masterplan
		Require an Odour assessment
		Require a Flood Risk assessment
		Public Rights of Way retention
		Remove or amend landscape and/or criteria
		· ·
Sproughton	LA014	Objections include:
		<ul> <li>Allocation does not meet extant planning application boundaries</li> </ul>
		Overly subjective
Sproughton	LA018	Objections:
		Overly subjective
		Support:
		Flexibility through use class E.

Sproughton  LA116 Objections include:  Consistency with appeal decision  Heritage concern  Habitat assessment  Flood risk	
<ul> <li>Highways concern</li> <li>Loss of identity</li> <li>Air quality</li> </ul>	
<ul> <li>Lack of consultation</li> <li>Policy wording should: <ul> <li>Require an Archaeological assessment</li> <li>Identify where financial contributions are required for services in Ipswich.</li> <li>Identify measures to address impacts on air pollution</li> </ul> </li> <li>Support: <ul> <li>Water mains reference</li> </ul> </li> </ul>	swich.
● Support allocation  Wherstead – Bourne Hill N/A Objection:	
Restore 2006 settlement boundary	
Wherstead – Bourne Hill LA016 Objections include:  • Highways concerns • Air quality	
Policy wording should:	
Require a Flood Risk assessment  Alternative and/or additional sites were proposed in Sproughton, Wherstead – Bourne Hill and Wherstead Park	

### Babergh – Market Towns and Urban Areas

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Hadleigh	LA027	Support:
		Reference to existing sewers
Hadleigh	LA028	Objections include:
		Completion rates unlikely to be significant
		Dwelling yield should be increased
		Policy wording should:
		Require Flood risk assessment
Hadleigh	LA114	Objections include:
		Deliverability of the site
		No housebuilder/promoter involvement
		Site access
		Support:
		Support allocation
		Reference to existing sewers
Hadleigh	N/A	Objection:
		Sporting facilities
		Health facilities capacity
		Education capacity
		Recreational provision
Sudbury	N/A	Objections include:
		Open space designation should cover all of Belle View Park
Sudbury / Chilton	N/A	Objection:
		<ul> <li>Open space provision as part of Chilton Woods development should be identified.</li> </ul>
		<ul> <li>Boundary for Chilton Woods scheme should exclude community woodland and County Wildlife site.</li> </ul>
Alternative and/or add	ditional sites were pro	posed in Hadleigh.

### Babergh – Core Villages

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Acton	LA045	Policy wording should:
		Require Flood risk assessment
		Support:
		Reference to existing water mains
Acton	N/A	Objections include:
		Allocate site at Barrow Hill which has planning permission.
Boxford	N/A	Objections include:
		Object to site being designated as Open Space.
Bildeston	LA048	Objections include:
		Highways and heritage concerns
		Support:
		Support allocation
		Reference to water mains
Brantham	LA053	Objections include:
		Prejudges current planning application
		Landscape impact
		Heritage impact
		Policy wording should:
		Make heritage amendments
		Support:
		Support allocation
		Reference to water mains
Brantham	N/A	Support:
		Support Brantham Regeneration site

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Capel St Mary	LA054	Support:
		Support site being included in the settlement boundary
Capel St Mary	LA055	Objections include:
		Heritage impacts
		Disproportionate development
		Education contributions
		Healthcare contributions
		Undermines Neighbourhood Plan
		Policy wording should:
		Require Public Rights of Way retention
		Require compliance with the Councils Heritage Impact Assessment, include a concept diagram and require a masterplan
East Bergholt	LA061	Policy wording should:
		Remove healthcare and education contributions
Great Cornard	LA039	Objections include:
		Flood risk
		Impact on wildlife
		Policy wording should:
		Require Public Rights of Way retention
		Require flood risk assessment
		Support:
		Support allocation
		Reference to water mains
Great Cornard	LA040	Objections include:
		Flood risk
		Impact on wildlife
		Overdevelopment of site

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Great Cornard LA040		Policy wording should:
continued		Require Public Rights of Way retention
		Require flood risk assessment
		Support:
		Reference to water mains
Great Cornard	LA042	Objections include:
		Flood risk
		Impact on wildlife
		Disproportionate development
		Highways concerns
		Healthcare facilities
		Education capacity
		Building height
		Green space and nature reserve
		Transport assessment
		Recycling banks
		Policy wording should:
		Require Public Rights of Way retention
		Require flood risk assessment
		Require ecological survey
		Require greater flexibility in all parts
		Identify land for a cemetery
		Identify land for onsite recycling banks
		Support:
		Reference to water mains
		1 Reference to water mains
Great Cornard	N/A	Objections include:
		Allocate land for cemetery
Holbrook	N/A	Support:
		Education and Royal Hospital School approach

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Holbrook	LA068	Objections include:
		Site allocation should be expanded to between 34 and 59 dwellings.
		Policy wording should:
		Require Public Rights of Way retention
Lavenham	N/A	Objections include:
		Object to land being designated as Open Space
Long Melford	LA113	Support inclusion of site.
		Policy wording should:
		Require Country Wildlife Site protection
Long Melford	Settlement	Objections include:
	Мар	Show full extent of conservation area
Shotley Street	LA075	Objections include:
		Heritage impact
		Policy wording should:
		Require an archaeological assessment
		Flood risk assessment
		Support for site allocation.
Alternative and/or ac	  ditional sites were pr	oposed in Bildeston, Boxford, Brantham, Capel St Mary, Great Cornard, Lavenham, Long Melford,

#### <u>Babergh – Hinterland Villages</u>

Nayland

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Assington	N/A	Objection:  • Settlement boundary should reflect neighbourhood plan
		Gettlement boundary should reflect heighbourhood plan

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Bentley	LS01 (3)	Objections include:              Development of site should incorporate recommendations in Valued Landscape Report             Too high a density.             Landscape impact.             Alternative site proposed in neighbourhood plan.             New policy required to allocate land for primary school to have better access to the playing fields.
Chelmondiston	LS01 (6)	Objections include:
Chilton	LA041	Policy wording should:  Reword heritage policy criteria. Protect/enhance rights of way.
Chilton	N/A	Objections include:  • Alternative description of Chilton provided.
Cockfield	LS01 (8 & 9)	Objections include:  • Heritage impact.
Elmsett	LS01 (10)	Objection:  • Deliverability of site identified.
Great Waldingfield	LS01 (11)	Objection:  • Heritage impact.
Great Waldingfield	LS01 (12)	Objections include:      Whole site not been assessed.      Highways issues.      Heritage impact.
Hintlesham	N/A	Objection:  New policy required to allocated land to provide a new car park for the primary school.

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Hintlesham	LS01 (13)	Objection:
		Heritage impact.
Kersey	N/A	Objection:
		Kersey is not within the RAMS Zone, delete from background text.
Raydon	LS01 (20)	Objection:
		Heritage impact.
Stoke by Nayland	LS01	Objection:
	(23, 24 & 25)	concerns over former allotment site which can often support Priority species
Stoke by Nayland	LS01 (23)	Objection:
		Impact on AONB / landscape
		Highways concerns
		Heritage concerns
Stoke by Nayland	LS01 (24)	Support site.
Stoke by Nayland	N/A	Object to land being designated as Open Space
Stutton	LS01	Objection:
	(26, 27, 28)	Sites should not be allocated until an ecological assessment is produced
Additional and/or altern	native sites proposed	d in Chelmondiston, Elmsett and Gt Waldingfield

#### Babergh – Hamlets

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Aldham	LS01 (1)	Objection:
		Policy should require compliance with Aldham NP
Harkstead	N/A	Support for settlement boundary
Hitcham	N/A	Objection:
		Object to designation of a site as open space

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Holton St Mary	LS01 (15)	Objection:
		Heritage Impact
		Support for site.
Lawshall - Lambs Lane	LS01 (16)	Objection:
		Not a deliverable site
Leavenheath	LA098	Objection:     Site should be increased to approximately 80 dwellings.     Eastern site boundary should align with existing development line parallel to A134     Insufficient separation between hamlets of High Road and Honey Tye
		Policy wording should:
		Reword landscape criteria
		<ul> <li>Criteria V - Do not support the removal of substantial tree line and grass verge along the frontage of the site to create a footpath.</li> </ul>
Little Melalicarticle	Commonstinant to other	Retain and enhance public rights of way
Little Waldingfield	Supporting text	Objection:  • Lack of reference to advanced stage of the NP
Milden	N/A	Objection:
		No opportunities for growth
Raydon - Lower	N/A	Objection:
Raydon		Boundary has been expanded, should revert to 2019 Settlement boundary
Shimpling Street	N/A	Objection:
		Revert settlement boundary to 2019 consultation
		Request for open space designations
Stanstead	LS01 (22)	Objection:
		Heritage impact
Wenham Magna	LS01 (30)	Objection:
		Heritage impact

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Woolverstone	LS01 (31)	Objections include:
Woolverstone	LS01 (32)	Objections include:

# Place Section - Mid Suffolk

### Mid Suffolk – Ipswich Fringe

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Barham - Sandy Lane	LA119	Objection:
		Ecological assessment should inform suitability for development/allocation.
Bramford	N/A	Lack of primary care facilities (health).
Bramford	LA006	Objection:
		To increase from 100 to 115 dwellings
		Policy should require:
		Flood risk assessment
		Measures for managing impacts on archaeological remains

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Bramford LA006		Measures to address impacts on air pollution
continued		Transport mitigation
Bramford	LA007	Policy should require:     Flood risk assessment     Include measures for managing impacts on archaeological remains     Transport mitigation     Measures to address impacts on air pollution
Bramford	LA107	Support site allocation.  Policy should require:  Transport mitigation Density too high Measures to address impacts on air pollution
Claydon with part Barham	LA001	Objections include:

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Claydon with part	LA002	Objections include:
Barham		Coordinated approach to development sites required
		Heritage impact
		Policy should require:
		Require compliance with the Councils Heritage Impact Assessment, include a concept  diagrams and assessment are related.
		diagram and require a masterplan  • Flood risk assessment
		Reference to ISPA Transport Mitigation Strategy
		Measures to address impacts on air pollution
		• Weasures to address impacts on all pollution
		Request to remove or amend a number of policy requirement to provide greater flexibility and in
		line with application on adjoining land.
Claydon with part	LA003	Objections include:
Barham		Coordinated approach to development sites required
		Heritage impact
		Number of dwellings should be increased, or site size reduced
		'Important Hedgerows' should be clarified
		Policy should require:
		Policy should require:
		<ul> <li>Require compliance with the Councils Heritage Impact Assessment, include a concept diagram and require a masterplan</li> </ul>
		Reference to ISPA Transport Mitigation Strategy
		Measures to address impacts on air pollution
		Wododroe to addroed impacte off all policitori
Great Blakenham	LA010	Objection:
		Ecological assessment should inform suitability for development/allocation.
		Policy should require:
100		Flood risk assessment
Whitton	LA102	Objections include:
		Ecological assessment should inform suitability for development/allocation.
		Site should be expanded to the north

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Whitton LA102		Policy should require:
continued		<ul> <li>Reference to ISPA Transport Mitigation Strategy</li> <li>Measures to address impacts on air pollution</li> </ul>
Additional and/or alternative sites were proposed in Great Blakenham and Whitton		

### Mid Suffolk – Market Towns and Urban Areas

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Eye	LA020	Objections include:  • Allocation should include food store as allocated in Neighbourhood Plan.  • Flexibility in policy requested.
		Policy should require:  • Flood risk assessment
		<ul><li>Rights of Way should be retained and enhanced</li><li>Transport mitigation</li></ul>
Eye	LA021	Policy should require:  • Transport mitigation
Eye	LA099	Support allocation.
		Policy should require:
		<ul> <li>Transport mitigation</li> <li>Include measures for managing impacts on archaeological remains</li> </ul>
Eye	LA109	Support site allocation.
Needham Market	LA031	Policy should require:  • Flood risk assessment
Needham Market	LA032	Policy should require:  • Flood risk assessment

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Stowmarket	N/A	Objections include:
		<ul> <li>Fails to recognise economic opportunities at "Station Quarter" as allocated in the Stowmarket Area Action Plan.</li> </ul>
Stowmarket	LA033	Policy should require:
		Measures against odour pollution from Water Recycling Centre
		Rights of Way should be retained and enhanced
		Transport mitigation
Stowmarket	LA035	Support for site.
		Objections include:
		Object to requirement for a pre-school
Stowmarket	LA036	Objections include:
		Amend capacity to 446 from 400 dwellings
		Policy should require:
		Flood risk assessment
		Support reference to water mains on site.
Stowmarket	LA037	Policy should require:
		Flood risk assessment
		Support reference to water mains on site.
Stowmarket	LA044	Objections include:
		Need to protects the farm setting of the Clamp Farm area
		Highways concerns
		<ul> <li>Greater emphasis on maintaining character, local community and natural beauty of the area</li> </ul>
		Change to ensure any harm of heritage assets is minimised
		Ecological survey should be removed and assessed planning application stage
		Land in Anglian Water's ownership is removed from the area
		Support for principle of allocation.

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Stowmarket LA044 continued		<ul> <li>Policy should require:</li> <li>Policy should state the different land uses within Class E (e.g. E(a) retail sales use), and include C1 and Sui Generis Use</li> <li>Heritage criteria should be reworded</li> <li>Flood risk assessment</li> <li>Reference development briefs</li> <li>Rights of Way should be retained and enhanced</li> </ul>
Stowmarket	LA108	Objection:  • Clarify what uses are proposed as part of allocation site
Additional and/alternative	sites were propos	sed in Needham Market and Stowmarket

### Mid Suffolk – Core Villages

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Bacton	LA046	Objection:
		Land actually lies within parish of Wyverstone
		Policy should require:
		<ul> <li>Requirement for 1.7ha of land for educational use to provide a new school.</li> </ul>
Bacton	LA047	Policy should require:
		Add provision of Amenity Green Space
Botesdale and	LA050	Policy should require:
Rickinghall		Rights of Way should be retained and enhanced
Debenham	LA056	Policy should require:
		Flood risk assessment
		Transport statement
		Support:
		Strategic Flood Risk Assessments completed.

Settlement	JLP Site Ref	f Main issues raised during consultation (2020)		
Debenham	LA057	Policy should require:		
		Transport statement		
		Ensure safe route to schools through provision of footway		
Debenham	LA058	Policy should require:		
		Transport assessment		
		Ensure safe route to school through provision of footway		
Elmswell	LA063	Support site allocation.		
		Policy should require:		
		Transport assessment		
		A footway link to the existing network		
Elmswell	LA064	Policy should require:		
		Existing Anglian Water's to be considered in site layout		
		Flood risk assessment		
Elmswell LA065 (		Objection:		
		Amend to 90 not 50 dwellings		
		Policy should require:		
		Existing Anglian Water's to be considered in site layout		
		Flood risk assessment		
Haughley	LA104	Policy should require:		
		Odour assessment		
		Flood risk assessment		
Mendlesham	LA073	Objections include:		
		Harm to countryside		
		Heritage concerns		
		Amended to reflect the extent of land in the outline planning consent		
		Healthcare concerns		
Stonham Aspal	N/A	Objections include:		
		Reflect likely shortfall in Primary School status		

Settlement	JLP Site Ref	Main issues raised during consultation (2020)		
Stowupland	LA078	Objections include  No longer required since LA079 with planning permission Part VI and XI are not relevant Education requirements Healthcare concerns  Policy should require:		
		Reference the mitigation measures outlined within the HIA		
Stowupland	LA100	Policy should require:  Rights of Way should be retained and enhanced		
Stradbroke	N/A	Objection:  • Allocations should be set at minimum figures to enable flexibility to help deliver ambitious housing numbers		
Stradbroke	LA080	Policy should require:  Transport assessment		
Stradbroke	LA081	Policy should require:  • Flood risk assessment - Current hydraulic flood risk modelling undertaken in the SFRA deemed unsuitable  • Transport assessment		
Stradbroke	LA082	Policy should require:  Transport assessment		
Stradbroke	LA083	Policy should require:  • Transport assessment		
Thurston	N/A	<ul> <li>Objections include</li> <li>Map needs to show real extent of housing development</li> <li>Inconsistency with sites with and without planning permission accounted for</li> <li>Disproportionate growth</li> <li>Contrary to Neighbourhood Plan</li> <li>Highways concerns</li> </ul>		

Settlement	JLP Site Ref	Main issues raised during consultation (2020)
Thurston	LA084	Policy should require:
		Mitigation measures to ensure rail safety
Thurston	LA085	Objections include:
		Highway concerns
		Policy should require:
		Flood risk assessment
		Transport assessment
Thurston	LA086	Policy should require: <ul> <li>Mitigation measures identified for passenger safety at the Thurston Railway Station</li> <li>Contributions to library facilities</li> </ul>
		<ul><li>Contributions to open space provisions</li><li>Flood risk assessment</li></ul>
Thurston	LA087	Objections include:
		Must comply with NP  In one case to 240 from 200 duesling as
		Increase to 210 from 200 dwellings
		Policy should require:
		Mitigation measures for accessibility improvements at the Thurston Railway Station
		Flood risk assessment
Thurston	LA089	Policy should require:
		Mitigation measures for accessibility improvements at the Thurston Railway Station
		Heritage Impact Assessment should be fully complied with
Thurston	LA118	Flood risk assessment     Objections include:
THUISION	LATIO	Permission should not be granted
		Policy should require:
		Flood risk assessment

Settlement	JLP Site Ref	Main issues raised during consultation (2020)	
Walsham le Willows	N/A	Objection:	
		Housing Type and Design	
		Lack of designated of Local Green Spaces.	
Woolpit	LA093	Objections include:	
		Rights of Way should be retained and enhanced	
Woolpit	LA094	Objection:	
		Rights of Way should be retained and enhanced	
Woolpit	LA095	Objections include:	
		Heritage Impact	
		Disproportionate development	
		Not identified in Neighbourhood Plan	
		Highways concerns	
		<ul> <li>Requirement for a primary school site as part of LA095 is no longer considered to be necessary or justified</li> </ul>	
		Policy should require:	
		<ul> <li>Require compliance with the Councils Heritage Impact Assessment, include a concept diagram and require a masterplan</li> </ul>	
		Flood risk assessment	
		Rights of Way should be retained and enhanced	
Woolpit	LA097	Objections include:	
		Highways concerns	
		Policy should require:	
		Flood risk assessment	
		Transport assessment	
Woolpit	LA120	Objections include:	
		Remove inclusion of Lawn Farm business park extension in the plan	
		Boundary should be extended to also include the full extent of the Outline consent	
Additional and/or altern	ative sites were pro	posed in Bacton, Botesdale & Rickinghall, Elmswell, Haughley, Mendlesham, Thurston, Woolpit	

# Mid Suffolk – Hinterland Villages

N/A	Objections include:	
	Objections include:	
	Settlement boundary	
	Sites should not be considered without an ecological assessment	
LS01 (40)	Objections include:	
	Heritage impact	
LS01 (43)	Objections include:	
	Site should be replaced with site in neighbourhood plan	
	Highways concerns	
	Heritage impact	
	Loss of important views and spaces	
N/A	Objection:	
	Settlement boundary should be expanded to include residential garden	
LS01 (74)	Objection:	
	Heritage impact	
LS01 (48)	Objections include:	
	Heritage impact	
N/A	Objections include:	
	<ul> <li>Sites should not be considered without an ecological assessment</li> </ul>	
	Extant planning permission should be included within boundary	
N/A	Objection:	
	Object to land being designated as open space.	
N/A	Objection:	
	Objection to settlement boundary expansion to include residential garden	
N/A	Objection	
	Allocation required for new car park to accommodate school expansion	
G & T site	Objection:	
	White Elms Caravan Low Road is only a temporary caravan site.	
LS01 (58)	Objection	
	<ul> <li>Site should not be considered without an ecological assessment</li> </ul>	
	LS01 (43)  N/A  LS01 (74)  LS01 (48)	

Settlement	JLP Site Re	Main issues raised during consultation (2020)
Metfield	LS01 (60)	Objections Include:
		Impact on conservation area
		Heritage impact concerns
		Disproportionate
		Impact on wildlife
		Highway issues
		Limited services and facilities
		Support for site.
Onehouse	LS01 (67)	Objections include:
		Should be left as green belt / strategic gap
		No mention of historic Paupers Graves and their significance
		Support for site.
Palgrave	N/A	Objections include:
		Open space
		Settlement boundary
Redgrave	N/A	Objections Include:
		Object to designating playing field as open space.
Redgrave	LS01 (71)	Objection:
		Heritage impact
Somersham	N/A	Objection:
		Settlement boundary
Stonham Parva	LS01 (76)	Objection:
		Heritage impact
Thorndon	N/A	Objection
		Amend to include neighbourhood plan sites
Thwaite	N/A	Objections include:
		Sites should not be considered without an ecological assessment
		Settlement boundary

Settlement	JLP Site Ref	Main issues raised during consultation (2020)	
Thwaite	LS01 (79)	Objection:	
		Heritage impact	
Yaxley	LS01 (89)	Objections include:	
		Site should not be considered without an ecological assessment	
		Access issues	
		Excessive area	
Yaxley	LS01 (90)	Objections include:	
		Site should not be considered without an ecological assessment	
		Access issues	
		No mains drainage	
	ernative sites were prop	posed in Beyton, Earl Stonham, Finningham, Hoxne, Mendham, Rattlesden, Wetheringsett-cum-	
Brockford, Wilby			

# Mid Suffolk – Hamlets

Settlement	JLP Site Ref	Main issues raised during consultation (2020)	
Badwell Ash – Long	LS01 (38)	Objections include:	
Thurlow		Disproportionate development	
		Highways concerns	
		Heritage impact	
Badwell Ash – Long	LS01 (39)	Objections include:	
Thurlow		Disproportionate development	
Battisford	N/A	Objection:	
		Water supply	
		Sewage waste	
		Electricity supply	
		Broadband concerns	
Baylham	N/A	Objection:	
		Settlement boundary	
Drinkstone - Church and	N/A	Objection:	
Green		Settlement boundary should reflect neighbourhood plan	

Settlement	JLP Site Ref	Main issues raised during consultation (2020)	
Great Ashfield	N/A	Objection:	
		Settlement boundary should be expanded	
Haughley - Green	N/A	Objections include:	
		Settlement boundary should be expanded	
Mendlesham - Green	N/A	Objection:	
		Open space omitted	
Oakley	LS01 (62, 63)	Objection:	
		Sites had previously been refused in SHELAA	
		Support for sites.	
Pettaugh	LS01 (68)	Objections include:	
		Flawed evidence	
		Highways concerns	
		Poor access to services and facilities	
Thornham Magna	N/A	Objection:	
		Settlement boundary	
Westhorpe	LS01 (82)	Objection:	
		Highways concerns	
		Flood risk	
		Disproportionate development	
		Heritage impact	
		Odour from sewage works/piggery	
Wetheringsett –	LS01 (83)	Objection:	
Brockford St		<ul> <li>Site should not be allocated without an ecological assessment</li> </ul>	
Woolpit – Borley Green	N/A	Objection:	
		Expand boundary to include extant planning permissions	
Worlingworth	LS01 (87)	Objection:	
		Site should be increased from 5 dwellings to 15	
Additional and/or alternat	ive sites were prop	posed in Creeting St Peter, Haughley – Green, Mendham – Withersdale St, Norton	

## **General comments on JLP**

Policy	Main issues raised during consultation (2020)
	1. The Plan needs stronger commitments to addressing climate change matters and environmentally important sites.
	2. The Babergh Saved Policy CS10 (Brantham Regeneration Area) should be retained in the new Plan to ensure employment use is delivered on site and not 100% housing.
	3. The Stowmarket Area Action Plan (SAAP) policies should remain in place until a new vision for Stowmarket is considered and established.
	<ol> <li>The relevant policies of the Plan, need to be updated to make reference to designations identified in made Neighbourhood Plans.</li> </ol>
	5. The Councils need to be clear on the narrative of past and current housing delivery rates.
	<ol> <li>The Profile section of the Plan needs greater recognition of the key Essex communities of Colchester, Braintree and Chelmsford.</li> </ol>
	7. The Council has not carried out consultation for the minimum time period prescribed in the Regulations.
	3. The Plan's Policies map is inadequate and does not include a district wide map.
!	9. The Plan extends beyond the 2036 evidence base period and it is unclear how the growth estimates have been identified up to 2037.

## **Sustainability Appraisal**

## Main issues raised during consultation (2020)

- 1. There is considerable uncertainty regarding the impact of the Local Plan's policies with SA Objective 11 (conserve & enhance biodiversity and geodiversity)
- 2. Any policies or proposals that do not adequately protect or fully consider the impacts of development on Natura 2000 (N2K) or SSSI should be removed or modified.
- 3. It should be made clear as to which alternatives have been considered and adopted to demonstrate that avoidance has been a priority.
- 4. The monitoring indicators proposed are not sufficient to meet the relevant regulations to include suitable monitoring indicators in the SA.
- 5. Sudbury no cumulative impact assessment has been made regarding the Chilton Woods and Tye Farm developments.
- 6. A comprehensive strategic SA should be carried out across the wider Ipswich planning area.
- 7. The 2019 SA Addendum was not considered at BMSDC Full Council meetings in June 2019.
- 8. The assessment of reasonable alternatives should not be based upon the SHELAA outcomes. The SHELAA is out of date.
- 9. Support the spatial options tested, however, further site specific criteria could be used to improve sustainability outcomes.
- 10. The SA has not fully evaluated the impacts of proposed Ipswich Fringe growth on services and facilities in Ipswich.
- 11. The SA has not properly informed the JLP with regard to air quality matters.

## Main issues raised during consultation (2020)

12. Alternative allocation sites proposed in: Bentley, Boxford, Brantham, Debenham, Glemsford, Haughley, Long Melford, Mendlesham, Needham Market, Stowmarket, Stowupland, Wherstead

## **Habitats Regulations Assessment**

## Main issues raised during consultation (2020)

- 1. The HRA is not sufficiently rigorous or robust, and it is not possible to ascertain that the proposals will not result in adverse effects on relevant sites
- 2. The use of the Zone of Influence boundaries and Impact Risk Zones for the scoping of the assessment needs to be reviewed.
- 3. The approach to screening on impact pathways concerning water quality, water quantity and air quality need further review.
- 4. The HRA Tables 7 and 8 need further detail to explain the scoping decisions made.
- 5. Effective monitoring of air quality needs to be identified to prevent adverse impacts.

## Appendix A – Regulation 18 Who Was Consulted

The list below sets out the organisations and persons who were invited to make representations under (Regulation 18) by email or post. This is in line with the requirements set out in The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Councils Statement of Community Involvement. Consultation with the most relevant Duty to Cooperate partners is also evidenced through the relevant Statement of Common Grounds and Duty to Cooperate Statement.

## **Statutory Consultees:**

- The Coal Authority
- Historic England
- Environment Agency
- Highways England
- Homes England
- Marine Management Organisation
- Natural England
- Network Rail
- Ipswich and East Suffolk Clinical Commissioning Group
- West Suffolk Clinical Commissioning Group
- South Norfolk Clinical Commissioning Group
- Suffolk Police
- Suffolk County Council (including Local Highways Authority)
- East Suffolk Council (formerly Suffolk Coastal District Council & Waveney District Council)
- West Suffolk Council (formerly Forest Heath District Council & St. Edmundsbury Borough Council)
- Ipswich Borough Council
- Norfolk County Council
- Essex County Council
- South Norfolk Council
- Braintree District Council
- Breckland District Council
- Colchester Borough Council

- Tendring District Council
- Greater London Authority
- Mayor of London
- All Town and Parish Councils and Parish Meetings within the Districts
- All Town and Parish Councils and Parish Meetings which border the Districts
- Suffolk Associations of Local Councils
- BT Group Plc
- Vodafone and O2
- EDF Energy
- National Grid
- UK Power Networks
- Anglian Water
- Essex & Suffolk Water

## **General Consultation Bodies:**

- Voluntary bodies whose activities benefit any part of the authority's area
- Bodies that represent the interests of different racial, ethnic or national groups
- Bodies that represent the interests of different religious groups
- Bodies that represent the interests of disabled persons
- Bodies that represent the interests of businesses in the area

## Examples include:

- The Canal and River Trust;
- Civil Aviation Authority;
- Dedham Vale AONB & Stour Valley Project Area and Suffolk Coast & Heaths AONB
- Department for Education
- Greater Anglia;
- Ministry of Defence
- · Ministry of Housing, Communities and Local Government
- Norfolk & Suffolk Gypsy, Roma and Traveller Service & Steering Group

- Sport England
- Sudbury & District Citizens Bureau;
- Suffolk Coalition of Disabled People
- Suffolk Chamber of Commerce
- Suffolk Fire & Rescue Service
- Suffolk Preservation Society
- Suffolk Wildlife Trust
- The Woodland Trust
- Transport for London
- New Anglia Local Enterprise Partnership (LEP)

## Other Individuals and Organisations:

Includes local businesses, individuals, local organisations and groups, planning agents, developers, land owners and others on the Joint Local Plan mailing list.

## **Appendix B – Consultation Materials**

The Councils set up a dedicated consultation portal and online mapping system which allowed people and organisations to view the relevant documents and maps and make comments online during the consultation periods. Paper comment forms were made available online, at the Councils head-office, Customer Access Points at Stowmarket and Sudbury and all libraries within the Districts. These forms could be posted, emailed or handed to the Councils at their headoffice address. At the Regulation 18 Stage Consultations (2017 and 2019) the Councils also accepted written and email comments which were not made on the comment form.

## Copy of Letter Sent to Joint Local Plan Consultees – Dated 22<sup>nd</sup> July 2019





22<sup>nd</sup> July 2019

#### BABERGH AND MID SUFFOLK JOINT LOCAL PLAN CONSULTATION (July 2019)

Babergh District Council and Mid Suffolk District Council are undertaking a second round of consultation on a new Joint Local Plan. The consultation period runs from 22<sup>nd</sup> July 2019 until 4pm on 30<sup>th</sup> September 2019. This consultation is part of the initial stages of plan production and is being carried out under Regulation 18 of the Town and Country Planning (Local Plan) (England) Regulations 2012.

The Joint Local Plan will inform how our Districts will develop over the next 18 years. It will establish how much housing and land for businesses will be needed and where it will go, alongside protecting and enhancing the environment and delivering infrastructure.

As a registered consultee, we are writing to inform you of the consultation and provide you with the opportunity to make comments on the Joint Local Plan.

To view the consultation document online, and to submit your comments, please visit our websites at: www.babergh.gov.uk/jointlocalplan or www.midsuffolk.gov.uk/jointlocalplan.

Paper copies of the consultation document are also available to view at libraries within the Districts and at the Councils' office for the duration of the consultation period.

A series of initial public drop-in events are being held where you can come along and find out more. These are scheduled as follows (please see overleaf):



Babergh and Mid Suffolk District Councils Endeavour House, 8 Russell Road, Ipswich IP1 2BX Telephone: (0300) 1234 000 www.babergh.gov.uk www.midauffolk.gov.uk



Date	Time	Venue	Address
Tuesday 6 <sup>th</sup> August	2pm to 5pm	United Reform Church	Ipswich Street, Stowmarket IP14 1AD
Thursday 8th August	3.30pm to 6.30pm	Copdock Village Hall	London Road, Copdock, IP8 3JN
Tuesday 13 <sup>th</sup> August	3.30pm to 5.30pm	Stradbroke Community Centre	Wilby Road, Stradbroke, IP21 5JN
Wednesday 14 <sup>th</sup> August	3.30pm to 7pm	Lavenham Village Hall	Church Street, Lavenham, CO10 9QT

Details of further events will be published on the Councils' websites and through other communication channels.

Comments should be submitted online via the consultation system available through the websites at <a href="www.babergh.gov.uk/jointlocalplan">www.midsuffolk.gov.uk/jointlocalplan</a>. Alternatively comments can be emailed to <a href="localplan@baberghmidsuffolk.gov.uk">localplan@baberghmidsuffolk.gov.uk</a>, or posted to Strategic Planning Policy Team, Babergh and Mid Suffolk District Councils, Endeavour House, 8 Russell Road, Ipswich IP1 2BX. A printable comments form can be downloaded from the websites or collected from the Councils' offices or from libraries in the Districts. If you wish to deliver your comments in person, please telephone us on the number below.

Please ensure that your comments on the Joint Local Plan are received by 4pm on 30<sup>th</sup> September 2019.

Following this consultation, we will consider all of the comments received before we publish the next version of the Joint Local Plan for further consultation.

Should you have any queries in relation to the new Joint Local Plan, please do not hesitate to contact the Strategic Planning Policy team using the contact details above. (Please note that when calling our main telephone number, 0300 123 4000, you will need to select option 5, and then option 4 for Strategic Planning Policy team).

Yours sincerely,

Robert Hobbs Corporate Manager – Strategic Planning



Babergh and Mid Suffolk District Councils Endeavour House, 8 Russell Road, Ipswich IP1 2BX Telephone: (0300) 1234 000 www.babergh.gov.uk www.midsuffolk.gov.uk

Copy of Email sent to contacts on the Babergh and Mid Suffolk Joint Local Plan Consultation Mailing List 22<sup>nd</sup> July 2019.

Dear Sir / Madam,

## **BABERGH AND MID SUFFOLK JOINT LOCAL PLAN CONSULTATION (July 2019)**

Babergh District Council and Mid Suffolk District Council are undertaking a second round of consultation on a new Joint Local Plan. The consultation period runs from 22<sup>nd</sup> July 2019 until 4pm on 30<sup>th</sup> September 2019. This consultation is part of the initial stages of plan production and is being carried out under Regulation 18 of the Town and Country Planning (Local Plan) (England) Regulations 2012.

The Joint Local Plan will inform how our Districts will develop over the next 18 years. It will establish how much housing and land for businesses will be needed and where it will go, alongside protecting and enhancing the environment and delivering infrastructure.

As a registered consultee, we are writing to inform you of the consultation and provide you with the opportunity to make comments on the Joint Local Plan.

To view the consultation document online, and to submit your comments, please visit our websites at: <a href="https://www.babergh.gov.uk/jointlocalplan">www.babergh.gov.uk/jointlocalplan</a> or <a href="https://www.babergh.gov.uk/jointlocalplan">www.midsuffolk.gov.uk/jointlocalplan</a>.

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,	3.30pm to 5.30pm	l _	Wilby Road, Stradbroke,
13 <sup>th</sup> August		Centre	IP21 5JN
1	3.30pm to 7pm	Lavenham Village Hall	Church Street, Lavenham,
14 <sup>th</sup> August			CO10 9QT

Details of further events will be published on the Councils' websites and through other communication channels.

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## Please ensure that your comments on the Joint Local Plan are received by 4pm on 30<sup>th</sup> September 2019.

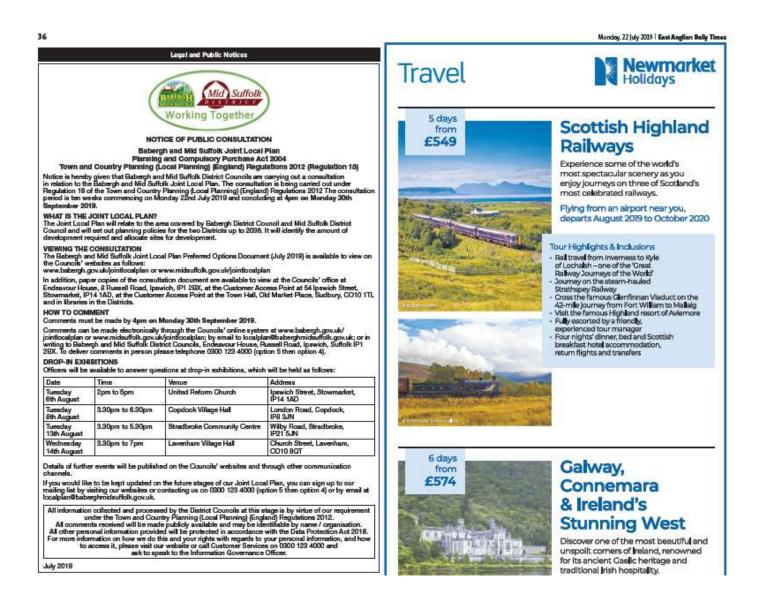
Following this consultation, we will consider all of the comments received before we publish the next version of the Joint Local Plan for further consultation.

Should you have any queries in relation to the new Joint Local Plan, please do not hesitate to contact the Strategic Planning Policy team using the contact details above. (Please note that when calling our main telephone number, 0300 123 4000, you will need to select option 5, and then option 4 for Strategic Planning Policy team).

Yours sincerely,

Robert Hobbs
Corporate Manager – Strategic Planning

## Copy of Notice of Public Consultation – East Anglian Daily Times 22<sup>nd</sup> July 2019:



### **Example of Press Articles & Social Media Posts**

## East Anglian Daily Times – Wednesday 7th August 2019



A drop-in event is being held in Copdock this week - among the first in a series of consultations around the area.

over the next 18 years.

Session dates during August are: Copdock Village Hall, August 8, 3,30pm to 6,30pm: Stradbroke Community Centre, August 13, 3.30pm to 5.30pm; Lavenham Village Hall, August 14, 3.30pm to 7pm; Elmswell -

Village Hall, August 22, 3pm to 6.30pm; Stowupland Village Hall, August 27, 2.30pm to 5pm; Pinewood Community Centre, August 28, 3pm to 7pm; Rickinghall Village Hall. August 29, 3pm to 5.30pm.

There will be more consultations during September.

See www.midsuffolk.gov.uk/ features/have-your-say-on-ourdraft-joint-local-plan for more

## East Anglian Daily Times - Online 5th August 2019



Full Article Link: https://www.eadt.co. uk/news/drop-insessions-on-17500new-homes-insuffolk-1-6199964

27 September 2019 Q

## Babergh DC Tweet - 8th August 2019



We'll be in Copdock & Washbrook Village Hall from 3.30pm today: drop by any time til 6.30pm to speak with us about our Joint Local Plan.

Residents from across Babergh & Mid Suffolk are welcome today and at any of our upcoming events: find a full list at ow.ly/R77I50vrpzT



9:13 AM - Aug II, 2019 - Hoomune Inc.

## Mid Suffolk DC Facebook Post 27th September 2019



## Copy of A5 leaflet sent to all addresses in the Districts in 2017

# Joint Local Plan

You may have heard that we are currently inviting everyone to have their say on the new Babergh and Mid Suffolk Joint Local Plan.

#### What is the Joint Local Plan?

The Joint Local Plan will inform how our Districts will develop over the next 20 years and will set out the policies against which planning applications will be considered, along with any Neighbourhood Plans that are made.

There is a need to deliver more housing in our Districts - the Joint Local Plan will identify where new housing should go and what types of housing should be built. It will also seek to promote our economy by identifying land for businesses and setting out policies for the future of our town centres. Alongside this, the Joint Local Plan will set out an approach to protecting and enhancing our environment and delivering infrastructure.

Potential sites for development are also identified – your views on these will be important when the Councils decide which sites to allocate for development in the Joint Local Plan.

#### Where can I find out more?

A series of drop in events are being held where anyone can come along and find out more. These are being held at:

Monday 2nd October – The Blackbourne Community Centre, Blackbourne Road, Elmswell, IP30 9GY

Wednesday 4th October – United Reformed Church, Ipswich Street, Stowmarket, IP14 1AD

Thursday 5th October - Eye Community Centre, Magdalen Street, Eye, IP23 7AJ

Monday 9th October - Tattingstone Village Hall, School Road, Tattingstone, IP9 2NA

Wednesday 11th October – Hadleigh Town Hall, The Guildhall, Market Place, Hadleigh, IP7 5DN

Thursday 12th October - Sudbury Town Hall, Old Market Place, Sudbury, CO10 1TL

All events will run from 2pm to 7pm.

# Babergh and Mid Suffolk Joint Local Plan

## To view the consultation online visit:

www.babergh.gov.uk/jointlocalplan www.midsuffolk.gov.uk/jointlocalplan

Paper copies of the consultation document are also available in the Councils' offices and in libraries in the Districts.

#### How can I comment?

Comments should ideally be submitted online via the websites above.

Alternatively comments can be emailed or posted to us. A comments form, containing details of how to comment, can be downloaded from the websites or collected from the Councils' offices or from libraries in the Districts.

Comments on the Joint Local Plan must be received by 5pm on Friday 10th November 2017.

### What happens next?

We will consider all of the comments received before we publish the next version of the Joint Local Plan for further consultation.

Email: localplan@baberghmidsuffolk.gov.uk

Phone: 0300 123 4000 (select option 5, then option 4) #bmsdcjointlocalplan

The events in Sudbury and Stowmarket will also include additional special 'Vision For Prosperity' events for the two towns. The Councils are seeking views on the public's priorities for delivering projects within the towns. See more at www.babergh.gov.uk/VFPSudbury or www.midsuffolk.gov.uk/VFPStow and follow us on twitter at #VFPSudbury and #VFPStow

