

Babergh and Mid Suffolk Joint Local Plan

Statement of Common Ground

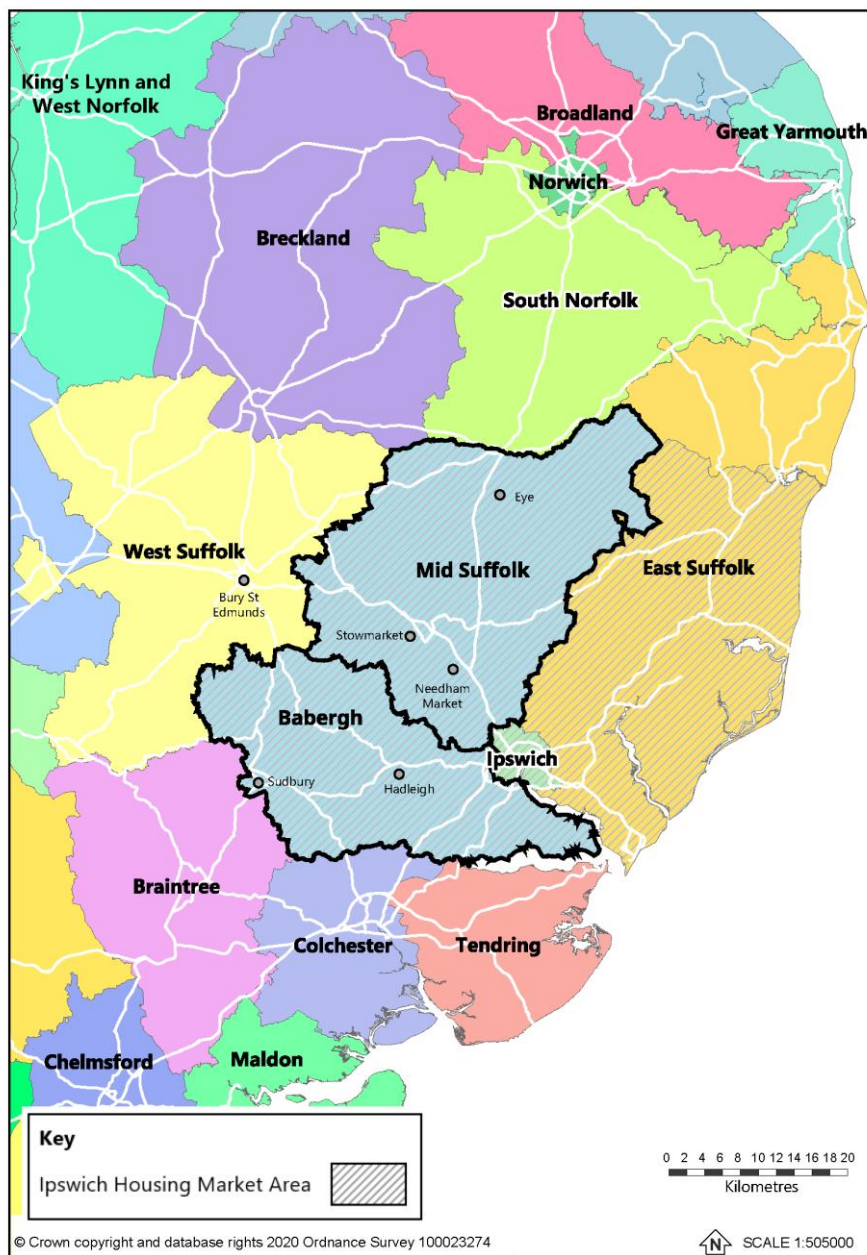
Between

Babergh and Mid Suffolk District Councils and West Suffolk Council

INTERIM statement (Version One: November 2020)

1. Areas covered by the Statement of Common Ground

The Statement of Common Ground relates to the area covered by the local planning authorities of Babergh District Council, Mid Suffolk District Council and West Suffolk Council.



2. Authorities covered by the Statement of Common Ground

The signatories to this Statement of Common Ground are:

- Babergh District Council;
- Mid Suffolk District Council; and
- West Suffolk Council.

Engagement will be undertaken with Suffolk County Council, the West Suffolk Clinical Commissioning Group and the West Suffolk NHS Foundation Trust as this Statement of Common Ground is developed prior to submission of the Joint Local Plan for Examination.

3. Purpose of Statement of Common Ground

Local planning authorities have a statutory duty to co-operate with specified bodies in relation to strategic planning matters.

The National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance require local authorities to produce a Statement of Common Ground as a written record on progress made for strategic planning matters across local authority boundaries and for this to be kept under review.

West Suffolk Council have raised concerns to planning applications being determined in Thurston and to a lesser extent in Elmswell and Woolpit and the cumulative impact of residential development on public services, especially health, highways and leisure. Comments were submitted to the Babergh and Mid Suffolk Strategic Planning team in May 2020.

West Suffolk Council and Suffolk County Council have shared GIS information with Babergh and Mid Suffolk District Councils to support the preparation of the Sustainability Appraisal. West Suffolk Council have also provided information to support the preparation of a Babergh and Mid Suffolk Water Cycle Study.

4. Strategic matters being addressed

- i) The following cross boundary infrastructure issues have been identified: health, highways and leisure.

The Joint Local Plan sets in policy SP08 the approach to strategic infrastructure. Section 16 contains local policies for healthy communities and infrastructure. Detailed site-specific infrastructure requirements are set out in the Place section of the Joint Local Plan. The Infrastructure Delivery Plan (IDP) lists the infrastructure needs assessed as a result of the planned and committed growth as set out in the Joint Local Plan and will be reviewed annually.

Health

In respect of health providers, they will look at provision that meets their service priorities. The West Suffolk Clinical Commissioning Group (CCG) covers the cross-boundary area to the west of both Babergh and Mid Suffolk Districts and to the east of West Suffolk. A map showing the catchment area of the CCG will be sought.

Babergh and Mid Suffolk Joint Local Plan growth potentially affects practices in West Suffolk, which include Mount Road Surgery (Moretonhall), Ixworth and Stanton. However, in the case of Ixworth there is no planned mitigation as there is minor growth within Mid Suffolk in this

area. We understand from the CCG that the Stanton Surgery is in the process of obtaining planning permission to increase capacity at the surgery.

In addition, Woolpit Health Centre is identified to be expanded to address growth in nearby villages including Elmswell and Thurston, in addition to growth in Woolpit itself.

West Suffolk Council have commented in respect of health:

'Reg. 18 Plan identifies Thurston as a Core Village and in terms of infrastructure Woolpit Health Centre is identified as serving Thurston but requires expansion to facilitate existing planning commitments and Joint Local Plan growth for the area. The individual allocations make reference to infrastructure requirements, but other than the generic reference to health, they all require improvements to local infrastructure within the village. However, a simple search on the NHS website shows Mount Farm Surgery at Moreton Hall as the nearest GP practice (measured in a straight line) 10 minutes by car via Mount Road, and 17 minutes by train and bus. Woolpit Health Centre is listed as 6th closest in distance (measured in a straight line) after three other Bury St Edmunds practices and the Ixworth practice, via the A14, 9 minutes by car with no public transport alternative shown on Google Maps.'

Section 4.3 of the IDP considers "The local context for patients of Babergh and Mid Suffolk" and details existing provision of GP practices.

Table 15 sets out "Health needs arising from growth of the JLP and new committed growth". It includes healthcare practices "located in neighbouring authorities "as the impact of the growth of the JLP may require mitigation through contributions". In West Suffolk only the GP practices at Clare (a branch of Hardwick House Surgery at Sudbury), Stanton and Ixworth are listed.'

The CCG are considering undertaking a feasibility study focusing on growth within the A14 corridor so that health impacts can be considered holistically and mitigated appropriately. The planned health needs that are arising from the developments in Thurston are being addressed through provision at the Woolpit Health Centre, subject to this feasibility study.

West Suffolk have identified a requirement for an evidence base to identify the impact of growth on health services together with deliverable mitigation to resolve this concern, which will be the responsibility of West Suffolk CCG working in partnership with the local authorities.

It is agreed that Babergh District Council, Mid Suffolk District Council and West Suffolk Council will agree a project plan to determine 1) impact on health services/facilities, 2) mitigation measures and 3) how and when that mitigation will be delivered to ensure health needs are adequately addressed in their discussions with the West Suffolk Clinical Commissioning Group, and the West Suffolk NHS Foundation Trust.

Transport

In respect of highways, it is necessary to focus on the junctions and road capacity in and around the proposed development along the A14 transport corridor that can be improved through new development.

In addition, there was a package of measures put forward to Highways England by Suffolk County Council under the Roads Investment Strategy 2 – 2020 to 2025. These proposals are considered by the Department for Transport. Within the package of measures proposed, were improvements to two A14 junctions located in West Suffolk:

- Junction 43 – Sugar beet junction at Bury St Edmunds - £4.3 million, extra gyratory under bridges.
- Junction 44 – Bury St Edmunds - £7.3 million, extra gyratory plus left slip.

The proposals at these junctions were not approved. However, the Councils are in discussion with Highways England and Suffolk County Council on strategic highway matters.

To assess the impact of proposed sites for allocation in the Joint Local Plan on the road network, studies have been carried by consultants WSP using the Suffolk County Transport Model. The studies have been prepared in partnership with Suffolk County Council as the Highway Authority, along with the neighbouring local planning authorities within the Ipswich Strategic Planning Area (including East Suffolk Council for the former Suffolk Coastal District area and Ipswich Borough Council). For the later Model Run (Model Run 9), West Suffolk Council has been engaged in discussion as the Model Run methodology has evolved.

The Councils are in discussions with Highways England and Suffolk County Council in respect of mitigation measures to address the matters raised by the latest modelling.

West Suffolk Council have commented in respect of transport:

'Committed and planned growth in the settlements in the A14 corridor west of Stowmarket is: 3,029. In addition, planned growth at Stowupland and Haughley without any of the planned growth at Stowmarket means that there are around 4,000 homes committed and planned in Core Villages in the western part of Mid Suffolk. So cumulatively, with the growth in Thurston, impact the local road network is inevitable. This includes the key routes into Bury St Edmunds and beyond. The trunk route network is accessible via the A14, but, as has been identified by the IDP, there are capacity issues at key junctions in Bury St Edmunds and Newmarket. However, much of the traffic growth at Thurston will use existing county roads, particularly through Moreton Hall, which adds to congestion along Mount Road and the restricted railway bridge, or feeds onto Junction 44 of the A14 which has already been identified as operating at capacity. Alternatively, traffic will access the A143 at Great Barton, placing particular pressure on the Bunbury Arms crossroads, which has a poor accident record, and may have an impact on the Air Quality Management Area in Great Barton.'

Much of the growth in Elmswell, Thurston and Woolpit identified in the Joint Local Plan has the benefit of planning permission and these developments have identified transport mitigation measures.

The Babergh and Mid Suffolk IDP identifies the anticipated highways mitigation measures in relation to the Joint Local Plan proposed site allocations in these settlements as shown below:

Settlement	Anticipated mitigation
Elmswell	Mitigation for the proposed Joint Local Plan land allocations will require: <ul style="list-style-type: none">- New footway links.- Traffic calming measures (where necessary).- Bus stop improvements (where necessary).- Carriageway improvements (where necessary).- Contributions towards cycle/pedestrian link between Elmswell and Woolpit.- Land to the north of Church Road (LA064), Land to the north west of School Road (LA065) and Land West of Station Road (LA066) – mitigation measures at School Road and Church Road junction (further investigation would be required in relation to any impact on heritage). Capacity issues with junction of New Road / Warren Lane

	<p>and Church Road / Cross Street would also require further investigation.</p> <ul style="list-style-type: none"> - Need to also consider and mitigate any impact on level crossings. This will be assessed with a Transport Assessment which is needed to determine the impact on existing network and cumulative impact of development in the area.
Thurston	<p>Mitigation for the proposed Joint Local Plan land allocations will require:</p> <ul style="list-style-type: none"> - New footway links. - Additional bus stops may be required within the settlement. - Traffic calming measures (where necessary). - Contributions towards the railway station accessibility improvements may also be required. - Land to the west of Barton Road (LA085) – carriageway widening with footway are required along Church Road, with priority system under railway bridge. - Major accident cluster site at crossways junction of Barton Road and Station Hill. Impact on railway bridge would need to be fully assessed with Transport Assessment.
Woolpit	<p>Mitigation for the proposed Joint Local Plan land allocations will require:</p> <ul style="list-style-type: none"> - New footway links. - Contributions towards cycle/pedestrian link between Elmswell and Woolpit. - Contribution towards mitigation measures agreed with Suffolk County Council and Highways England for A14 junction 47 (DC/18/04247/OUT). - Land west of Heath Road (LA097) – will likely require widening of the carriageway.

In respect of public transport, key infrastructure including the East to West rail line (Felixstowe to Nuneaton) can be improved to ensure better frequency and reliability of services. Greater Anglia have invested £1.4 billion in a new fleet of trains which are now operational on the network. The new fleet in particular increases capacity on the East to West rail line that includes the stations of Elmswell, Thurston and Bury St Edmunds.

Railway station improvements are planned for Thurston in relation to the passenger level crossing and could possibly be funded through the Community Infrastructure Levy, by monies to be received from current commitments and new development proposed in the Joint Local Plan. Due to the safety issues raised by Network Rail, this project is identified as critical and will be assessed and prioritised against other infrastructure needs for the area.

There is a Haughley Railway Junction improvement project, which would accommodate a Strategic Freight Network objective of increasing capacity, whilst also delivering significantly improved commuter services along the East to West rail line, between Ipswich and Cambridge.

Development within the Babergh and Mid Suffolk Joint Local Plan will be able to support commercially viable bus services.

In respect of the transport modelling undertaken, West Suffolk Council have fed into Model Run 9 and have also raised some concerns as follows:

- That the report does not completely reflect the complexity of the cross-boundary issues between particular land east of Bury and Thurston area. There are some real capacity problems both in the Strategic Road Network (SRN) and the Local Road network, and if the model is only working because the model is deferring some traffic onto the local network then that is also an unsatisfactory solution. Furthermore, if the model makes different assumptions and there is a highway objection to a planning application for a major strategic site in West Suffolk, then West Suffolk Council have a serious concern and would seek further discussion.
- Adjustments to the numbers and further clarification on the modal shift assumptions for the demand adjustments.
- Would like the mitigation to be discussed further with Babergh and Mid Suffolk District Councils, Suffolk County Council and Highways England.

It is agreed that Babergh District Council, Mid Suffolk District Council and West Suffolk Council will continue to work together in undertaking transport modelling evidence with Suffolk County Council and Highways England to ensure impacts of growth on the transport network beyond the boundaries of Babergh and Mid Suffolk are understood and mitigation is considered. An additional sensitivity test has been commissioned and the results once reviewed will help to identify pressures on the network and areas where there is over-capacity to enable consideration of appropriate mitigation measures.

Sport and Leisure

In respect of sport and leisure provision, Babergh and Mid Suffolk District Councils have published a Leisure, Sport & Physical Activity Strategy Summary 2017-2030 (2017), which outlines the top strategic priorities for leisure, sport and physical activity within Babergh and Mid Suffolk.

This document identifies a shortfall of swimming pool provision in Mid Suffolk and the need for some additional provision in Babergh. The strategy focuses on enhancement of existing facilities. It is acknowledged that the deficit will need further investigation and feasibility studies carried out, to provide evidence in preparation of any review of the Joint Local Plan.

The focus on enhancement of swimming provision is supported by improvements to the leisure centre offer in Babergh and Mid Suffolk Districts and also in West Suffolk District.

In Sudbury, there is a focus on improving health and fitness facilities, for example increasing the gym capacity from 40 exercise stations to 100 exercise stations and improving and expanding swimming facilities to address an identified undersupply of swimming lesson capacity.

In Stowmarket, there is a focus on improving and expanding health and fitness, swimming and outdoor facilities, addressing an identified undersupply of sports hall provision and swimming lesson capacity.

West Suffolk Council has an agreed business case to provide leisure and community facilities in the form of a new built Leisure Centre including swimming pool. This project will provide the leisure offer for the population of Bury St Edmunds and surrounding villages, including users from the Babergh and Mid Suffolk area.

West Suffolk Council have commented in respect of leisure:

‘Given the role of Bury St Edmunds as a Sub-Regional centre, it is likely that many of the residents of the new homes in Thurston will look towards the town for most of their services and needs including leisure, employment and shopping. Given its close proximity, much of that demand is likely to fall upon the Skyliner Gym at Moreton Hall, and the Abbeycroft Leisure Centre on the western side of the town. It is possible that a very small proportion of Thurston residents will access Bury by train and there is a very good cycle link, but many will rely on the private car. Given the overall scale of development proposed, particularly compared to the indigenous growth within the town, it is likely to place significant pressure upon existing services, with no mitigation proposed.

Note that the Council has not produced an open space, sport and recreation evidence base. We will be producing such evidence for our Local Plan and existing evidence from our (western way) proposal concludes that the catchment area extends into Mid Suffolk – naturally residents and future residents of Thurston and the surrounding are using and will continue to use Bury leisure centre. Many Thurston residents will use public services in the town, and it would be helpful to see evidence for this and a consequential need for appropriate mitigation.’

As detailed above, current provision for leisure resulting from growth in Babergh and Mid Suffolk Districts is being met through enhancements to existing swimming pools and leisure centres. West Suffolk Council have identified an impact on Bury Leisure Centre and this can be addressed through further conversation regarding Community Infrastructure Levy monies.



It is agreed that Babergh District Council and Mid Suffolk District Council are undertaking a programme of investment in leisure facilities within the two districts, and that further investigation and collaborative work on the need for additional swimming / and provision of gym and leisure centre facilities will be undertaken with local authorities in Suffolk to mitigate the impact / demand from the planned growth within the Joint Local Plan.

5. Next steps and process for reviewing the Statement of Common Ground

Impact on highway, leisure and health infrastructure needs have been considered through the development of the Babergh and Mid Suffolk Joint Local Plan, however matters have been raised by West Suffolk Council, which require further consideration as the Statement of Common Ground is developed prior to submission. It is noted that planning permissions have already been given and identified mitigation. Mitigation and delivery of that mitigation is being discussed between the authorities. Further evidence to quantify the impact together with what mitigation is required. West Suffolk Council seeks to collaboratively work with Babergh and Mid Suffolk District Councils to agree and resolve the concerns prior to submission.

The Statement of Common Ground will be reviewed prior to the submission of the Joint Local Plan document for Examination, unless exceptional urgent matters emerge requiring faster review and will be updated where amendments are necessary.

6. Signatories

Signed on behalf of Babergh District Council  Name: Tom Barker Position: Assistant Director, Sustainable Communities	Date: 12/11/2020
Signed on behalf of Mid Suffolk District Council  Name: Tom Barker Position: Assistant Director, Sustainable Communities	Date: 12/11/2020
Signed on behalf of West Suffolk Awaiting signature Name: Position:	Date: