



JLP Core Document Library Ref: G02

Your Ref: -

Date: 05/05/2021

Mrs Annette Feeney  
Programme Officer

**By email only**

**Re: Babergh and Mid Suffolk Joint Local Plan Examination**

Dear Mrs Feeney,

The Inspectors have raised a number of queries. Please find the Councils' response enclosed.

Yours Sincerely,



Tom Barker  
Assistant Director Planning and Building Control

[Tom.barker@baberghmidsuffolk.gov.uk](mailto:Tom.barker@baberghmidsuffolk.gov.uk)

01449 724647

07747 460301



---

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

**1. Policy LP09 and paragraph 13.52 refer to “an up to date needs assessment”. Do the Councils consider the Ipswich Housing Market Area Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (May 2017) to be “an up to date needs assessment?”**

- 1.01 The Councils consider that the Ipswich Housing Market Area Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) (May 2017) ([Document EH03](#)) is an up to date assessment of the needs for additional pitches, plots and moorings in the Districts. It justifies a position which has informed the Plan which looks to address relevant needs from a 2018 base date.
- 1.02 The ANA was commissioned jointly to cover the areas of Babergh and Mid Suffolk Districts, Ipswich Borough, and the former Suffolk Coastal and Waveney Districts (now East Suffolk). The methodology involved a review of secondary information, liaison with key stakeholders and extensive face to face surveys with Gypsy and Traveller households and postal and face to face surveys of boat dwellers. The Norfolk and Suffolk Gypsy and Traveller Liaison service were closely involved in the production of the ANA.
- 1.03 Paragraph 1.36 of the ANA ([Document EH03](#)), confirms that the ANA was produced in line with the amended definition of Gypsy and Travellers, as set out in Appendix 1 of Planning Policy for Travellers Sites (2015) ([Document C11](#)). This definition and guidance remains up to date. No guidance is provided on how frequently such as assessment should be undertaken but the Councils are satisfied that the ANA remains up to date and provides a proportionate evidence base to inform this issue.
- 1.04 The identified need and supply of Gypsy, Traveller and Travelling Showpeople pitches and plots is set out in Tables 8 and 9 (page 9) of the Councils Topic Paper: Housing Objectively Assessed Needs ([Document EP02](#)), and Appendix 2 of the same document (pages 24 – 25) provides the detailed monitoring data of supply. This demonstrates that the needs identified in the ANA of Gypsy and Travellers in Mid Suffolk, and Travelling Showpeople in both Babergh and Mid Suffolk has been met.
- 1.05 In order to future proof Joint Local Plan (JLP) policies, the JLP refers to an ‘up to date needs assessment’ in Policy LP09 and paragraph 13.52 rather than directly referring to the ANA. This ensures that in the event of a new robust assessment of needs, the JLP and decision makers can react if there



is any additional assessment of the needs of Gypsy, Traveller and Travelling Showpeople and Boat Dwellers. This is consistent with the Councils approach to general housing, as set out in SP01, which expects new housing development to “reflect established needs in the most relevant district needs assessment, or any local housing needs surveys where relevant”.

- 1.06 The Councils anticipate that a new assessment of needs could be carried out early after the adoption of the emerging Plan, to ensure that a formal Plan review process can be undertaken in a timely manner, if required.



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

**2. With regard to the plan's retail policies we note that Policy SP06 (1) indicates that 6 settlements have defined town centre areas, but paragraph 14.10 indicates that only primary frontages and town centres for Hadleigh, Stowmarket and Sudbury are shown on the relevant Policies Maps. Can the Council indicate where the town centres for the other 3 settlements are defined? Furthermore the Policies Map does not appear to show town centre boundaries or primary frontages and neither are mentioned in the key. Appendix 4 has town centre maps for Hadleigh, Sudbury and Stowmarket but these do not show the primary shopping frontages. Can the Council clarify where the primary frontages are to be found?**

2.01 Policies SP06 and LP14 set out the main retail and town centre approach of the Plan. As a consequence of previous drafting iterations of Policy SP06, an error has occurred that lists Needham Market, Eye and Debenham in paragraph 1) of the policy. Subsequently, Policy SP06 (1) should only refer to Sudbury, Hadleigh and Stowmarket which will also bring it into consistency with the proposed town centre boundary maps as set out in Appendix 04 of the Joint Local Plan. Since this is a drafting error the Councils would intend to address this as an Additional Modification but would have no issue if the Inspectors were to consider that a Main Modification was a more appropriate mechanism for making the correction.

2.02 The settlement maps for Sudbury, Hadleigh and Stowmarket (and the Policies Map key) unfortunately do not identify the respective town centre boundaries. However, Appendix 04 of the Plan clearly sets out the proposed town centre boundaries for those settlements and has been subject to consultation. Primary frontages are not proposed in the Joint Local Plan. Accordingly, paragraph 14.10 of the Plan will need a minor amendment to reflect this. The Councils would also envisage dealing with this as an Additional Modification, unless the Inspectors would prefer to make it a Main Modification. The Policies Map is intended to illustrate the policies of the JLP. It is not a formal part of the JLP but the Councils would intend to update it in order to bring it into line with the (corrected) SP06.



**3. Please can you provide a factual response to the following question relating to employment policies:**

**a) Paragraph 9.14 refers to the baseline objectively assessed need for employment land. Please can the Councils confirm what this figure is and indicate the relevant document(s) in the evidence base where this can be found.**

3.01 The minimum objectively assessed need for employment land need is:

- Babergh – 2.9ha
- Mid Suffolk – 9.4ha

3.02 The source for the data is the Ipswich Economic Area Sector Needs Assessment ([Document EC03](#) p43, Table 3.7)

**b) SP05(1) indicates the need to be able to “ensure a continuous range and diversity of sites and premises are available to meet current and potential future economic needs....” What are the current and future potential needs, how do they relate to the objectively assessed need and where in the evidence base can they be found?**

3.03 The current sector employment needs are identified in the Ipswich and Waveney Economic Areas: Employment Land Needs Assessment ([Document EC02](#), p87).

3.04 The future anticipated sector employment needs are identified in Ipswich and Waveney Economic Areas: Employment Land Needs Assessment ([Document EC02](#), p102) and Ipswich Economic Area Sector Needs Assessment ([Document EC03](#) p213). The Open for Business Economic Strategy ([Document D16](#) p7 and p26) also identifies key issues to be addressed at the local level. This includes protecting the employment base and safeguarding employment land, whilst delivering a range of employment land to meet identified needs – all of which are supported through the policy framework set out in the JLP.

**c) Are the strategic employment sites referred to in SP05(1) existing employment sites or new red-line boundary allocations (or are they a mix of the two)?**



3.05 They are a mixture, although all but two sites are built out and existing sites. The sites which are not currently built out are 1a) Stowmarket - Mill Lane and 1i) Woolpit – Lawn Farm. Both of these two sites have extant planning permission.

**d) When SP05(1) refers to the proposed expansion of these sites does this refer to expansion within the red-line boundary or an expansion of this boundary?**

3.06 It is intended that this means expansion of the existing boundaries – subject to all other policies in the Plan.

**e) Is any new land being allocated in the plan for employment development, if so how much and where?**

3.07 The objectively assessed need for employment land in both districts has been accommodated through extant planning permissions. Beyond built out and existing sites, the Plan identifies allocated provision for further employment land at:

- i. Capel St Mary – Land south west of Rembrow Road. 5000sqm (Allocation LA055).
- ii. Hadleigh – Frog Hall Lane. 5.5ha (Allocation LA028)
- iii. Sproughton – Poplar Lane. 4ha (Allocation LA014) – also has extant planning consent.
- iv. Stowmarket – Mill Lane. 52ha (Allocation LA044) – also has extant planning consent.
- v. Stowmarket – Gun Cotton Way. 11ha (Allocation LA108) – also has extant planning permission.
- vi. Woolpit – Lawn Farm. 17ha (Allocation LA120) – also has extant planning consent.

3.08 The sites above in Hadleigh and Stowmarket have been identified in previous allocation documents.

