



Our Ref: G04
Your Ref:

Date: 12th July 2021

Malcolm Rivett and Alison Partington
The Planning Inspectorate

(sent via e-mail to annette.feeney@baberghmidsuffolk.gov.uk)

Dear Sir and Madam

Babergh and Mid Suffolk Joint Local Plan Examination – Matter 1a – Legal Compliance

Further to our letter dated 25th June 2021 in respect of land at Stowmarket Road, Great Blakenham, document reference [G03](#), we are pleased to enclose the following documentation:

- Plan showing the settlement boundaries of the sites submitted in respect of land at Stowmarket Road, Great Blakenham, at the Regulation 18 and Regulation 19 stages;
- Strategic Housing and Economic Land Availability Assessment (SHELAA) site assessments; and
- Sustainability Appraisal site appraisals.

We trust you find this to be in order.

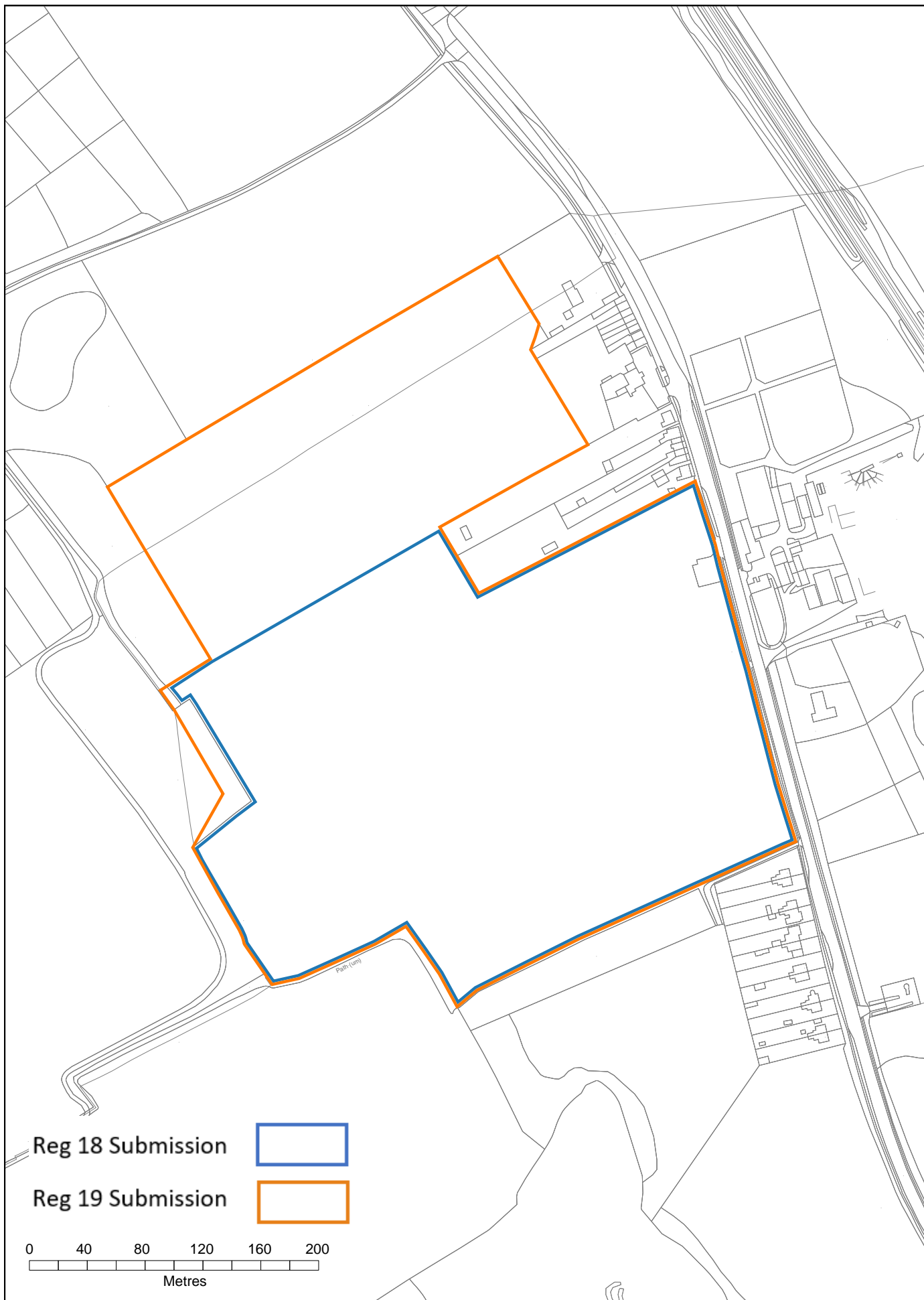
Yours faithfully



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BABERGH AND MID SUFFOLK DISTRICT COUNCILS

Great Blakenham



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Additional SHELAA assessment

Summary report

Parish / District:	Great Blakenham, (Mid Suffolk)		
Site reference:	SS1295 (larger site)		
Site location:	Land at Stowmarket Road, Great Blakenham		
JLP settlement hierarchy:	Ipswich Fringe Area		
Approx site area (ha):	14.31	Brownfield / greenfield / mixed use land:	greenfield
Existing land use:	Agricultural		
Neighbouring land use:	Agricultural, residential, plant hire and secondary aggregates / recycling business		
Recent planning history:	n/a		

Proposed land use description:	Residential up to 250 dwellings.
SHELAA site assessment summary	
Suitability:	Site is potentially suitable for residential development, but the following considerations would require further investigation: Highways - regarding access, footpaths and infrastructure required Heritage – archaeological potential and potential impact upon Grade II listed buildings. Biodiversity - site located within Suffolk Coast RAMS Zone of Influence. Protected Species have been recorded in proximity to the site, and County Wildlife Site located near the site. Minerals - site located within Mineral Safeguarding Zone Compatibility to adjoining land uses - potential noise, dust and light pollution from adjoining business use
Availability:	Site has not been marketed.
Achievability:	Local plan representation states that development of the scheme would take 30 months.

JLP allocated site reference:	n/a
Site conclusions:	Site is potentially considered suitable for residential development, taking identified constraints into consideration.
Estimated dwellings yield:	250
Estimated employment land area (ha) (where relevant)	n/a
Estimated delivery timescale:	Deliverable (0-5 years)

Summary report

Parish / District:	Great Blakenham, (Mid Suffolk)		
Site reference:	SS1295 (smaller site)		
Site location:	Land at Stowmarket Road, Great Blakenham		
JLP settlement hierarchy:	Ipswich Fringe Area		
Approx site area (ha):	9.84	Brownfield / greenfield / mixed use land:	greenfield
Existing land use:	Agricultural		
Neighbouring land use:	Agricultural, residential, plant hire and secondary aggregates / recycling business		
Recent planning history:	n/a		

Proposed land use description:	Residential for 120 dwellings.
SHELAA site assessment summary	
Suitability:	<p>Site is potentially suitable for residential development, but the following considerations would require further investigation:</p> <p>Highways - regarding access, footpaths and infrastructure required</p> <p>Heritage – archaeological potential and potential impact upon Grade II listed buildings.</p> <p>Biodiversity - site located within Suffolk Coast RAMS Zone of Influence. Protected Species have been recorded in proximity to the site, and County Wildlife Site located near the site.</p> <p>Minerals - site located within Mineral Safeguarding Zone</p> <p>Compatibility to adjoining land uses - potential noise, dust and light pollution from adjoining business use</p>
Availability:	Site promoted by agent/land promoter and has not been marketed.
Achievability:	Local plan representation states that development of the scheme would take 30 months.

JLP allocated site reference:	n/a
Site conclusions:	Site is potentially considered suitable for residential development, taking identified constraints into consideration.
Estimated dwellings yield:	120
Estimated employment land area (ha) (where relevant)	n/a
Estimated delivery timescale:	Deliverable (0-5 years)

Great Blakenham Parish

- **SS0654: Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham (Residential - yield: 8 dwellings)**
- SS0864: Land north of Gipping Road, Great Blakenham (Residential - yield: 20 dwellings)
- SS0952: Land south of Gipping Road, Great Blakenham (Residential - yield: 10 dwellings)
- SS1295A: Land at Stowmarket Road, Great Blakenham (Larger) (Residential – yield: more than 120 but fewer than 250 dwellings)¹
- SS1295B: Land at Stowmarket Road, Great Blakenham (Smaller) (Residential – yield: 120 dwellings)

SA Objective	Criteria	SS0654: Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham (Residential)	SS0864: Land north of Gipping Road, Great Blakenham (Residential)	SS0952: Land south of Gipping Road, Great Blakenham (Residential)	SS1295A: Land at Stowmarket Road, Great Blakenham (Larger) (Residential)	SS1295B: Land at Stowmarket Road, Great Blakenham (Smaller) (Residential)
1. To improve the health and wellbeing of the population overall and reduce health inequalities.	1a GP surgeries	--	-	-	--	--
	1b Open space, sport and recreation	++	++	+	+	+
	1c Public Rights of Way (PRoW)	++?	++	++	++	++
2. To maintain and improve levels of education and skills in the population overall.	2a Primary schools	--	-	-	--	--
	2b Secondary schools	-	-	-	--	--
	2c Further and higher education facilities	--	--	--	--	--
3. To reduce poverty and social exclusion and ensure access to jobs and services.	3a IMD	0	0	0	0	0
	3b Settlement hierarchy	++	++	++	++	++
	3c Centres of employment	+	++	++	+	+
4. To meet the housing requirements of the whole community.	4a Housing provision	+	+	+	+	+
	4b Barriers to housing and services	++	++	++	++	++
5. To conserve and enhance water quality and resources.	5a Source Protection Zones	-	-	-	-	-
	5b Water Resource Zones	-	-	-	-	-
	5c WwTW Flow Capacity	0	0	0	0	0
	5d Foul Sewerage Network Capacity	0	-	0	-	-

¹ There is no housing yield figure for site SS1295A. Due to the fact that the smaller site SS1295B is proposed for 120 new dwellings, the larger site SS1295A is expected to deliver more than 120 new dwellings but fewer than 250 dwellings.

SA Objective	Criteria	SS0654: Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham (Residential)	SS0864: Land north of Gipping Road, Great Blakenham (Residential)	SS0952: Land south of Gipping Road, Great Blakenham (Residential)	SS1295A: Land at Stowmarket Road, Great Blakenham (Larger) (Residential)	SS1295B: Land at Stowmarket Road, Great Blakenham (Smaller) (Residential)
6. To maintain and where possible improve air quality and reduce noise pollution.	6a AQMAs	--	--	--	--	--
	6b Noise	--	--	--	--	--
	6c Odour	0	0	0	0	0
7. To conserve soil and mineral resources.	7a Brownfield/greenfield land	--	++	++	--	--
	7b Agricultural land classification	--	-	-	--	--
	7c Minerals	-	-	-	--	--
8. To promote the sustainable management of waste.	8a Consumption of materials and resources	?	?	?	?	?
	8b Sustainable design and construction techniques	0	0	0	0	0
9. To reduce contribution to climate change.	9a Transport links	-	+	+	-	-
	9b Energy consumption and potential for renewable energy use	0	0	0	0	0
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change.	10a Flood Zones	0	0	0	0	0
	10b Surface water flooding	--	0	0	--	--
	10c Sustainable design and construction techniques (including SUDS)	0	0	0	0	0
11. To conserve and enhance biodiversity and geodiversity.	11a Internationally and nationally designated biodiversity assets	--?	--?	--?	--?	--?
	11b Locally designated biodiversity assets, priority habitats and ancient woodland	--?	--?	-?	--?	--?
	11c Geological sites	0	0	0	0	0
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings.	12a Nationally and locally designated and non-designated heritage assets	-?	0?	-?	-?	-?
13. To conserve and enhance the	13a Landscape sensitivity	-	0	0	--	--

SA Objective	Criteria	SS0654: Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham (Residential)	SS0864: Land north of Gipping Road, Great Blakenham (Residential)	SS0952: Land south of Gipping Road, Great Blakenham (Residential)	SS1295A: Land at Stowmarket Road, Great Blakenham (Larger) (Residential)	SS1295B: Land at Stowmarket Road, Great Blakenham (Smaller) (Residential)
quality and local distinctiveness of landscapes and townscapes.	13b AONB	0	0	0	0	0
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area.	14a Employment deprivation	0	0	0	0	0
	14b Employment sites	0	-	0	0	0
15. To revitalise the District's town centres.	15a Town and district centres	--	--	--	--	--
16. To enable efficient patterns of movement and modal shift towards sustainable modes of transport.	16a Rail	--	--	--	--	--
	16b Bus	++	++	++	++	++
	16c Cycling	--	-	-	--	--

Major Positive

All sites are expected to have major positive effects against criterion 1c (Public Rights of Way) as they are located within desirable walking distance of a PRoW, and therefore are likely to encourage healthier and more active lifestyles. However, the score for site SS0654 (Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham) is recorded as uncertain as development could result in the loss or diversion of the PRoW. The sites are also within desirable walking distance of at least one bus stop. Therefore, all sites are expected to have major positive effects in relation to criterion 16b (Bus), as they may encourage travel by sustainable transport modes.

The sites are likely to have major positive effects in relation to criterion 3b (Settlement hierarchy) as they are each located within or adjacent to Great Blakenham, which is identified as part of the Mid Suffolk Ipswich Fringe. They are also expected to have major positive effects against criterion 4b (Barriers to housing and services) because they are located within one of the 20% most deprived areas with regard to the 'Barriers to housing and services' domain of the English Indices of Deprivation. Therefore, there is potential for residential development to contribute to housing where it is most needed.

Sites SS0864 (Land north of Gipping Road, Great Blakenham) and SS0952 (Land south of Gipping Road, Great Blakenham) are expected to have major positive effects in relation to criteria 3c (Centres of employment) and 7a (Brownfield/greenfield land) as they are located within desirable walking distance of strategic employment sites/enterprise zones, and are also located on brownfield land, which is considered to be an efficient use of land. Sites SS0654 (Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham) and SS0864 (Land north of Gipping Road, Great Blakenham) are expected to have a major positive effect against criterion 1b (Open space, sport and recreation) because they are located within desirable walking distance of an open space, sport and/or recreation facility, in addition to open country and/or registered common land, and are therefore likely to encourage healthier and more active lifestyles.

Major Negative

All sites are expected to have major negative effects in relation to criteria 6a (AQMA) and 6b (Noise) because they are located within 12.5km of an AQMA and fall within a Site Safeguarded Area of a waste management facility, whilst also experiencing noise pollution. Furthermore, all sites are expected to have major negative effects in relation to criteria 15a (Town and district centres) and 16a (Rail) because they are located over the preferred maximum walking distance to town and district centres, and railway stations, which may discourage the use of these more sustainable modes of transport. In addition, all sites are expected to have major negative effects in relation to criterion 2c (Further and higher education facilities) as they are located over the preferred maximum walking distance to such facilities.

All sites fall within the immediate vicinity of a SSSI (the 'All consultations' SSSI Impact Risk Zone) and/or within the 'Residential' SSSI Impact Risk Zone for the proposed dwelling capacity, and as such are expected to have major negative effects against criterion 11a (Internationally and nationally designated biodiversity assets). However, these effects are uncertain depending upon whether potential negative effects can be mitigated. All but one site are expected to have major negative effects against criterion 11b (Locally designated biodiversity assets, priority habitats and ancient woodland) because they are within 250m of at least one County Wildlife Site, including Great Wood, Great Blakenham Churchyard, RNR 106, River Gipping, Barham Pits, and Shrubland Park County Wildlife Sites. Sites SS0654 (Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham), SS1295A (Land at Stowmarket Road, Great Blakenham (Larger) and SS1295B (Land at Stowmarket Road, Great Blakenham (Smaller) are also within 100m of a priority habitat, whilst SS0654 and SS1295A are also within 100m of ancient woodland. However, these effects are uncertain depending upon whether potential negative effects can be mitigated.

Sites SS0654 (Land south of Chalk Hill Lane and West of Hood Drive, Great Blakenham), SS1295A (Land at Stowmarket Road, Great Blakenham (Larger) and SS1295B (Land at Stowmarket Road, Great Blakenham (Smaller) are also identified as having major negative effects in relation to criteria 7a (Brownfield/greenfield land) and 7b (Agricultural land classification) as they are classified as greenfield land and are partially or entirely on Grade 2 agricultural land, which is considered some of the best and most versatile agricultural land. In addition, these three sites are expected to have major negative effects in relation to criteria 1a (GP surgeries), 2a (Primary schools) and 16c (Cycling) as they are located over the preferred maximum walking distance to a GP surgery, primary schools, and a cycle way. The sites also contain land with a 1 in 30 year risk of surface water flooding, and as such are likely to have major negative effects in relation to criterion 10b (Surface water flooding).

Sites SS1295A (Land at Stowmarket Road, Great Blakenham (Larger) and SS1295B (Land at Stowmarket Road, Great Blakenham (Smaller) are expected to have major negative effects in relation to criterion 13a (Landscape sensitivity) because they were identified as having moderate-high landscape sensitivity to residential development as both sites play a role in separating the areas of ribbon development on the valley side along the B1114 Stowmarket Road and preventing the spread of Great Blakenham further up the valley side. Both sites are also expected to have major negative effects in relation to criteria 2b (Secondary schools) and 7c (Minerals) because they are more than 2,000m from a secondary school and therefore residents may not have easy access to secondary education, and are also within 250m of an existing, planned or potential minerals site allocated in the Suffolk Minerals and Waste Local Plan.

Conclusions

Overall, site SS0864 (Land north of Gipping Road, Great Blakenham) performs more strongly than the rest of the sites in this Parish, particularly as a result of its accessibility to open space, sport and recreation facilities, in addition to centres of employment. It also comprises brownfield land. Sites SS1295A (Land at Stowmarket Road, Great Blakenham (Larger) and SS1295B (Land at Stowmarket Road, Great Blakenham (Smaller) perform the worst, particularly in relation to landscape sensitivity, access to GP surgeries and further education facilities, proximity to cycle ways, and their location on greenfield land and high quality agricultural land. The two sites are also located within close proximity of a minerals site.

Significance scoring

As set out in the SA Report, in order to synthesise the scores against individual criteria into single 'significance' scores for each SA Objective, a significance score was developed. The significance scores for sites located in Great Blakenham Parish are set out below, for ease of comparison.

Policy-off significance scores summary table for Great Blakenham Parish

Site ref.	Site name	JLP Classification	Yield	SA1: Health and wellbeing	SA2: Education and Skills	SA3: Accessibility	SA4: Housing	SA5: Water	SA6: Air and Noise	SA7: Soils and Minerals	SA8: Waste	SA9: Climate Change Mitigation	SA10: Climate Change Adaptation	SA11: Biodiversity and Geodiversity	SA12: Historic Environment	SA13: Landscape/Townscape	SA14: Economic Growth	SA15: Town Centres	SA16: Sustainable Travel
Great Blakenham Parish																			
SS0654	Land south of Chalk Hill Lane and West of Hood Drive	Ipswich Policy Area	8	+	-	+	++	-	-	-	N/A	-	-	--?	-?	-	0	--	-
SS0864	Land north of Gipping Road	Ipswich Policy Area	20	+	-	++	++	--	-	++	N/A	+	0	--?	0?	0	-	--	-
SS0952	Land south of Gipping Road	Ipswich Policy Area	10	+	-	++	++	-	-	++	N/A	+	0	--?	-?	0	0	--	-
SS1295A	Great Blakenham (Larger)	Ipswich Policy Area	Fewer than 250 dwellings	+	-	+	++	-	-	-	N/A	-	-	--?	-?	-	0	--	-
SS1295B	Great Blakenham (Smaller)	Ipswich Policy Area	120	+	-	+	++	-	-	-	N/A	-	-	--?	-?	-	0	--	-

