



Babergh and Mid Suffolk

Joint Local Plan

Reg19 Main issues raised and Council responses - collated

June 2021



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Introduction

For the Babergh and Mid Suffolk Joint Local Plan Examination, the Councils have been required to produce Hearing Statements for the Matters raised in the Inspectors Matters & Questions. Further to this, in answering the questions (or as an appendix to its statements) the Councils should also provide a specific but brief response to each of the Main Issues raised during consultation (2020) which they have set out in the Regulation 20 'Main Issues' in the JLP Consultation Statement (Reg 22) [Doc A06].

This document has been produced for convenience, as a single collated version of all the main issues raised/responses appendices in each of the Council's Hearing Statements.

For further information please visit the Councils' JLP Examination webpages below:

<https://www.babergh.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-submission/joint-local-plan-examination/>

<https://www.midsuffolk.gov.uk/planning/planning-policy/new-joint-local-plan/joint-local-plan-submission/joint-local-plan-examination/>



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Matter 1a

DtC main issue

Duty to Cooperate. Main Issue	Councils' brief response
1. Support for identifying and cooperating on relevant strategic and cross boundary issues with designated bodies.	Noted. The Councils have engaged throughout the preparation of the JLP with neighbouring local authorities.
2. Despite unmet housing need not currently being identified, the Councils should provide policy mechanisms to deal with unmet need should they emerge.	See Matter 3 (Question 3.3)
3. The Plan does not identify Ipswich Strategic Planning Area wide growth objectives.	The Plan is compatible with these. See Matter 4 - Question 4.6
4. Suffolk Constabulary should be added to key Duty to Cooperate partners and added to relevant infrastructure sections of the Plan.	Suffolk Constabulary are not a prescribed body identified through the DtC. The infrastructure needs of Suffolk Constabulary are identified in the Councils' IDP. Policy SP08 identifies that all development will need to make provision for community infrastructure where identified through the IDP.

SA main issue

Sustainability Appraisal. Main issue	Councils' brief response
1. There is considerable uncertainty regarding the impact of the Local Plan's policies with SA Objective 11 (conserve & enhance biodiversity and geodiversity)	The Councils have worked with Natural England to satisfactorily resolve any uncertainties of interpreting the SA. A new Statement of Common Ground is being agreed with them.
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.	The Councils have gone through a robust process and an updated Statement of Common Ground is being agreed with Natural England.
3. It should be made clear as to which alternatives have been considered and adopted to demonstrate that avoidance has been a priority.	The SA documents the process followed for policy/allocation selection. Appendix G of the SA sets out reasons for selecting or rejecting site options.
4. The monitoring indicators proposed are not sufficient to meet the relevant regulations to include suitable monitoring indicators in the SA.	The Councils consider that the monitoring indicators are sufficient. If necessary, the indicators would be reviewed in response to any relevant changes through the examination process.
5. Sudbury - no cumulative impact assessment has been made regarding the Chilton Woods and Tye Farm developments.	Chilton Woods is part of the baseline position for the JLP. The impact of all allocations on the baseline position, including cumulative impacts, has been undertaken.

Sustainability Appraisal. Main issue	Councils' brief response
6. A comprehensive strategic SA should be carried out across the wider Ipswich planning area.	There is no requirement for this. Each respective Local Plan document in the wider Ipswich Planning area has carried out its own statutory SA.
7. The 2019 SA Addendum was not considered at BMSDC Full Council meetings in June 2019.	Full Council considered the final SA, and agreed the publication of the JLP in November 2020.
8. The assessment of reasonable alternatives should not be based upon the SHELAA outcomes. The SHELAA is out of date.	The process is considered appropriate. See Matter 4 (Question 4.10).
9. Support the spatial options tested, however, further site specific criteria could be used to improve sustainability outcomes.	The SA Framework used is considered appropriate.
10. The SA has not fully evaluated the impacts of proposed Ipswich Fringe growth on services and facilities in Ipswich.	It is not the role of SA to evaluate the burdens placed on the services and facilities of neighbouring authorities. Any such issues would, however, be addressed at the development management stage via Policies LP33 and LP35.
11. The SA has not properly informed the JLP with regard to air quality matters.	<p>The SA highlights potential issues regarding air pollution (which require a strategic approach and are likely to reduce over time as electric vehicles form a larger proportion of traffic), but it also recognises that Ipswich is the major jobs, services and facilities centre in the region and that therefore there are many sustainability advantages to focusing a proportion of development close to the town.</p> <p>The SA highlights potential issues regarding air pollution which require a strategic approach (e.g. the Ipswich Strategic Planning Area Transport Mitigation Strategy), rather than a site by site approach, and air pollution is likely to reduce over time as electric vehicles form a larger proportion of traffic.</p> <p>Para 7.561 of the SA Report notes that the Joint Local Plan does include policies that seek to promote sustainable forms of transport, as well as electric charging points for electric cars, which are less polluting than combustion engines and likely to become more commonplace during the Plan period.</p>
12. Alternative allocation sites proposed in: Bentley, Boxford, Brantham, Debenham, Glemsford, Haughley, Long	The JLP and SA are considered to have taken a robust approach to the identification, assessment and selection of sites.

Sustainability Appraisal. Main issue	Councils' brief response
Melford, Mendlesham, Needham Market, Stowmarket, Stowupland, Wherstead	

General main issue

General. Main issue	Councils' brief response
1. The Plan needs stronger commitments to addressing climate change matters and environmentally important sites.	Considered under Matter 7 (Environment).
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.	Considered under Matter 6 (Employment).
3. The Stowmarket Area Action Plan (SAAP) policies should remain in place until a new vision for Stowmarket is considered and established.	The Joint Local Plan will supersede all existing local plan, core strategy and area action plan policies, to ensure that all policies are robust and up to date.
4. The relevant policies of the Plan, need to be updated to make reference to designations identified in made Neighbourhood Plans.	Made Neighbourhood Plans are part of the development plan – see Matter 7 (question 7.5).
5. The Councils need to be clear on the narrative of past and current housing delivery rates.	Considered under Matter 3 (question 3.1).
6. The Profile section of the Plan needs greater recognition of the key Essex communities of Colchester, Braintree and Chelmsford.	The Joint Local Plan profile is considered to be appropriate.
7. The Council has not carried out consultation for the minimum time period prescribed in the Regulations.	The Regulation 19 Joint Local Plan consultation opened on 12 th November 2020 and closed on 24 th December 2020 (6 weeks) which complies with the requirements set out in the Regulations.
8. The Plan's Policies map is inadequate and does not include a district wide map.	The Councils' online Joint Local Plan Map provides full coverage of the Districts and each designation.
9. The Plan extends beyond the 2036 evidence base period and it is unclear how the growth estimates have been identified up to 2037.	Where applicable, the Councils have annualised growth estimates and rolled this forward to the 2037 end date of the plan.



Matter 2

LP09 Provision for Gypsy and Traveller and Travelling Showpeople

LP09 Main Issues	Councils' brief response
1. Supporting text and/or policy could reference the needs for short stay stopping sites identified in the evidence.	See question 2.2 for proposed modification.
2. Accommodation Needs Assessment underestimates needs and does not consider the Duty to Cooperate.	The Councils consider that the ANA is robust and conducted in line with national guidance. Furthermore, the ANA was produced in line with adjoining authorities. See question 2.1 above, and the Councils response to the Inspectors initial questions (Document G02 , paragraphs 1.01 – 1.06).
3. The evidenced supply of sites is not robust.	The Councils have provided monitoring data as part of the Housing - OAN Topic Paper (Document EP02 – Appendix 2).
4. Policy should make allowance for those that fall outside of the Planning Policy for Traveller Sites definition.	The ANA uses the definition of Gypsy and Travellers and Travelling Showpeople as defined in the National Planning Policy for Travellers Sites (Document C11). As set out in paragraph 13.50 proposals for those falling outside of the Planning Policy for Travellers Sites definition would be considered under the other relevant housing policies.
5. Policy should be more flexible and positive and allocate sites for permanent and transit accommodation.	A dual approach is used to both allocate sites currently used as Gypsy, Traveller and Travelling Showpeople use and have criteria to assess proposals for new sites which would be determined on their individual merits when and where there is the demand/ proposals.
6. All large housing developments should provide land for Gypsy and Traveller accommodation to improve social integration.	

LP10 Moorings, Marinas and Houseboats

LP10 Main Issues	Councils' brief response
1. Object to principle - all houseboats should be removed and are in River Orwell illegally.	The marinas identified in the plan have a historic of use for moorings, marinas and houseboats. A Statement of Common Ground is being produced with the relevant authorities
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.	Due to the environmental sensitivities of the areas in which moorings are located, the Councils consider that the criteria are appropriate and justified (see answers to questions 2.2 and 2.4 above).

Matter 3

SP01 main issues

SP01 – Housing Needs Main issues	Councils' brief response
1. Amendment to supporting text para 6.01 - Increase housing requirement due to unmet need from Ipswich Borough Council and include mechanism to respond rapidly.	No neighbouring authority has identified unmet housing need. See Question 3.3.
2. Increase housing requirement to ensure affordable housing needs are met.	The Plan sets out a strategy to meeting the overall housing needs in Babergh/Mid Suffolk up to 2037 including meeting the identified total affordable needs. See Question 3.1
3. Increase housing requirement in line with SHMA Part 2 Update and take account of growth strategies & strategic infrastructure improvements, to support economic slowdown.	As set out in the Councils OAN Housing Topic Paper (Document EP02 , paras 6 & 7), the Councils do not believe there are any circumstances relevant to Babergh and Mid Suffolk which would justify an increase in housing requirement.
4. The housing requirement should be increased to provide greater flexibility and aspiration.	The Plan includes a significant supply buffer of 20% to provide flexibility to change.
5. The standard methodology for calculating housing need not applied correctly to early Plan years.	The Councils approach to calculating the standard method is set out in question 3.1. The Councils have applied the latest minimum annual housing need figure (from the standard methodology) to cover the whole plan period (2018 – 2037).
6. Housing requirement and Plan period is supported.	Noted.
7. Housing requirement figure should be much less and based upon household projections.	The Councils have applied the national standard method to identify the housing need. As set out in question 3.1c, the Councils do not consider there to be any exceptional circumstances which would justify an alternative approach.
8. Support for importance of policy to provide right mix, type and size of new housing.	Noted.
9. The policy is not clear what the mix, type and size of housing developments are required.	Para 06.09 of the Plan, clarifies that the most up to date district needs assessment is currently the SHMA (2019) (Document EH05), which identifies a need for 2, 3 and 4 bedroom properties. See Question 3.5.
10. Further growth should be allowed where Local Housing Needs surveys identify additional requirements.	The housing targets in the JLP and Neighbourhood Plans are minimum figures and based on evidenced need.
11. JLP Housing trajectory is unrealistic. No evidence of deliverable and developable sites is provided.	To be addressed in Matter 10.



SP01 – Housing Needs Main issues	Councils' brief response
12. Support that the housing trajectory has a strong land supply. This must be maintained throughout the JLP period.	To be addressed in Matter 10.
13. Delivering extant planning permissions is very important. Small/Medium sites near urban areas could help diversify supply.	The Councils recent HDT test results indicate satisfactory delivery rates. The Plan includes sufficient diversity of sites in accordance with national policy.

SP02 main issues

SP02 – Affordable Housing Main issues	Councils' brief response
1. Referencing supporting text paras 7.02, 7.03 and 7.09 - incentivises urban sprawl/ does not meet composition of affordable needs.	The proposed approach is similar to existing affordable housing policy and the policies are flexible to respond to evidenced composition needs.
2. Uplift required to meet level of need.	See question 3.1b.
3. Approach not sufficiently flexible, 35% could be unviable, particularly in lower value or brownfield areas.	The policy makes an allowance for exceptional circumstances where the 35% requirement may not be met. See Question 3.7
4. 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.	Noted.
5. Policy approach lacks flexibility for off site provision.	The Councils consider this strategic policy to be appropriate and off-site details are set out in Policy LP08.
6. Potential for NP non-conformity if NPs have different thresholds.	35% affordable housing is established in existing policies. NPs can set their own local thresholds where they are evidenced and viable, and where the basic conditions test has been passed. If NPs have set lower thresholds for specific sites, Policy SP02(4) allows for a variance of affordable housing provision in exceptional circumstances, where it is evidenced and justified. Under section 38(5) of the Planning and Compulsory Purchase Act 2004, where conflicts between policies in different development plan documents arises, the conflict must be resolved in favour of the most recently adopted document.
7. Support 35% (+) requirement & support bungalow provision. Affordable houses should be prioritised for SP10 energy systems (i.e. affordable housing also to consider 'running' lifetime costs).	Noted

SP02 – Affordable Housing Main issues	Councils' brief response
8. 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.	A significant proportion of affordable housing is sourced from developer contributions. However, the Councils also have a programme to directly supply new affordable housing provision.
9. 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.	The Council considers the wording consistent with national policy for major development. If deemed appropriate, clarity could added to make explicit reference to housing developments.
10. Affordable provision should not be grouped on large sites, rather apportioned across site area.	An appropriate layout of affordable housing provision will often be scheme specific. However, Policy LP08 seeks to ensure provision is well integrated within a development site
11. Policy should reference types of development from the viability evidence that are exempt from affordable housing contribution.	This is not considered necessary. The thresholds for which AH contributions will apply are specified. The JLP policy makes provision for viability to be considered on case specific basis (see question 3.7b).

LP08 main issues

LP08 – Affordable Housing Main issues	Councils' brief response
1. No need for two JLP policies addressing affordable housing.	LP08 is a Local Policy and deals with matters of detail SP02 is a strategic high level policy.
2. Policy should state there may be circumstances where the 35% affordable is not achievable.	This is adequately addressed in policy SP02.
3. Delete last sentence of para 13.39 for consistency with NPPF para 64.	Noted. If the Inspectors consider that the change is needed, the Councils would be content to propose as a modification.
4. JLP policies need to refer to the tenure split of affordable housing.	Considered appropriate to refer to relevant evidence which may change over plan period.
5. Policy should ensure there is no conflict with the Government's requirement of at least 10% of new homes as affordable.	The Councils do not consider it to be appropriate to replicate this in policy.
6. Para 3 - Rural exception housing should refer to NPPF definition of affordable housing, not be limited to 'local affordable housing.'	Policy LP08(3) is to be read in conjunction with the relevant paras of the NPPF and NPPG. The Councils do not consider it is necessary to repeat the definition within the policy.
7. 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.	See Question 3.10



LP08 – Affordable Housing Main issues	Councils’ brief response
8. Affordable housing should be spread evenly across the site.	Policy requires affordable housing to be 'tenure blind' and integrated within a development. This is considered appropriate.
9. Policy should set out minimum/maximum number of affordable units to be grouped together.	The Councils note the management preferences of Registered Providers on a scheme specific basis. This approach would not be considered appropriate on a blanket basis.
10. Part 1c) - the approach needs further clarity regarding cumulative assessment and requirements.	It is considered that LP08(1)(c) is clear and will ensure that the Councils can secure affordable housing requirements on contrived subdivided sites.
11. No definition of exceptional circumstances for off-site affordable housing delivery.	This is in line with NPPF para 62 which requires AH provision to be made on-site, unless it can be robustly justified.

Matter 4

SP03 main issues

SP03 – Settlement Hierarchy Main Issue	Councils' brief response
1. 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.	The JLP seeks to take forward an allocations led plan, to provide certainty to communities and developers. 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 at the time. Exceptional circumstances for development in isolated locations is set out in national policy.
2. 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.	As above, isolated locations is excepted in accordance with national policy. Outside of settlement boundaries, proposals will be judged on their own merits at the time.
3. Amendment para 3) Need to clarify what is meant by 'exceptional circumstances.'	This is intended to apply as per the specified national policy circumstances. A policy modification has been proposed for consideration. (see Q4.3 above).
4. Amendment to para 1) - Restricting coalescence should be removed, and/or 'visual coalescence' is too subjective.	Avoidance of visual or physical coalescence is considered to be a clear and appropriate requirement. Ultimately though, this will require an assessment and judgement to be made regarding the merits of each case. For the proposed allocation sites put forward in the JLP, these matters have been considered within the evidence base (Document EE12).
5. Reference to para 3) - Settlement boundaries are inadequate to meet overall housing need.	The total development proposed in the plan, and which is included in the settlement, boundaries exceeds the identified overall housing need for the Plan.
6. Need a strategy for hinterland and hamlet villages, and clarity on links to Policy LP01.	The supporting text for the policy (para 08.04) confirms that the categories above hinterland/hamlets will take the largest growth. Residual growth is therefore to assist with a diversity of sites and maintain rural vitality through proportionate opportunities to meet local needs. Policy provision for windfall development in hamlets is set out in LP01.

SP03 – Settlement Hierarchy Main Issue	Councils' brief response
7. Criteria in para 4 are covered by Development Management policies, not justified to repeat here.	The Councils believe that the criteria are justified, and that the Local Policies within the JLP provide more detailed requirements.
8. 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.	These considerations are included within the relevant policies of the JLP e.g. heritage in LP21 The Historic Environment, amenity and NPs in LP26 - Design and Residential Amenity
9. The following settlements should be higher in the settlement hierarchy: Chelmondiston, Elmswell, Great Walmingfield, Hoxne, Mendlesham, Rattlesden, Wetherden.	The Councils considers that the weighted scoring system identifies a sound basis to identify the relative sustainability of settlements.
10. The following settlements should be lower in the settlement hierarchy: Acton, Shotley, Sproughton.	
11. Need greater clarity on what constitutes Ipswich Fringe area, and why Ipswich Fringe settlements are also core villages etc.	The Ipswich Fringe is identified on the Key Diagram and covers the combined parish area of settlements listed in Table 2 and 3 of the Plan. For planning purposes, all sites and settlements within the Ipswich Fringe will be treated as the top of the hierarchy. For consistency, the settlement hierarchy methodology considered all villages on a 'policy-off' basis. The plan then identifies those that are within the planning designation of the Ipswich Fringe.
12. Point thresholds used in settlement hierarchy needs to be justified.	The Councils have used planning judgement to apply the relevant thresholds used in the settlement hierarchy review, based on what is considered to be a discernable change in sustainability credentials. Inevitably around the margins of thresholds there is less distinction, but the approach and outcome is considered proportionate and justified.
13. Reference to supporting text para 8.03 - Scoring system fails to recognise the capacity, relevance, viability and permanence of services.	Points system is used to create a proportionate, simple and transparent methodology to indicate the broad and relative sustainability of settlements. It is not considered practical to include those matters within the methodology.
14. Hierarchy should be flexible to review changes in the service provision of settlements.	Changes to service and facility provision can be reviewed through formal plan review process.
15. Settlement hierarchy tables should identify Market Towns and A12/A14 settlements together as the second category of settlements.	The settlement hierarchy is used to identify the relative sustainability of settlements. The boundaries of the transport corridors are

SP03 – Settlement Hierarchy Main Issue	Councils' brief response
	identified on the Key Diagram. The Councils do not consider it appropriate to create another category or combine A12/A14 settlements within the settlement hierarchy. This would fail to recognise the distinctions between the settlement categories.
16. Too much emphasis on settlement hierarchy in para 1, should be a more balanced approach.	Part 1 of the policy includes a number of planning considerations. The Councils believe this is appropriate. (See Q4.2 above).

SP04 main issues

SP04 – Spatial Distribution Main issue	Councils' brief response
1. Support for the Plan increasing the supply and range of urban and rural housing proposed to meet needs.	Noted
2. Support for the proportion of growth in market towns and urban areas.	Noted
3. Increase proportion of housing being allocated to Ipswich Fringe, Market Towns and Urban Areas and Core Villages	The Council's spatial strategy is considered an appropriate balance between supporting sustainable development in both urban and rural areas. The SA identifies that the Ipswich Fringe, Market Towns and Core Villages are the most sustainable locations for new growth and the majority of growth is proposed there. There is limited deliverable growth opportunity along the A140 route.
4. Reduce proportion of growth on A14 corridor villages, increasing growth in A14 towns and communities along the A140 route.	
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.	
7. There should be a greater spread of growth across all Mid Suffolk Core Villages.	
8. Increase the proportion of growth for Hamlet Villages.	The JLP and the SA have considered the opportunities for new settlements in this Plan. It is not considered the favourable spatial strategy.
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.	The Councils have followed national guidance where 20% is considered appropriate to improve the prospect of achieving a planned supply – see question 3.4 (Matter 3)
11. Object to 20% buffer as it is not justified.	
12. Support 20% buffer.	Noted
13. A greater supply of housing should be found to ensure the housing needs requirements are met.	The Councils have identified a housing land supply buffer of approximately 20% which is

SP04 – Spatial Distribution Main issue	Councils' brief response
14. The Plan should contain reserve sites for each settlement to maintain delivery.	considered appropriate and significant to ensure that the full needs of the Plan can be met over the whole period – see question 3.4 (Matter 3).
15. Amend Policy SP04 to state that LS01 sites should be used as an additional supply buffer where Neighbourhood Plans to not deliver.	
16. 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.	The Council has already identified appropriate sites to meet the overall district needs.
17. Housing requirements in Sproughton, Lawshall and Hartest should be reduced following change in local circumstances.	Site specific matters, which may have an impact on housing requirements in Neighbourhood Plan Areas, will be considered in later Hearings.
18. For Mid Suffolk Core Villages, the total homes in policy SP04 and Table 04 is inconsistent.	The tables will not match as SP04 policy table is total growth in each settlement category and Table 04 are NP housing targets based upon designated parish areas. Due to the settlement hierarchy, some villages will have areas designated in more than one settlement category. In MSDC there are 17 places which have more than one settlement category type, meaning that the growth in them will be spread over multiple categories in the settlement hierarchy. The spatial housing approach topic paper Appendix A (Document EP03) sets out which settlement category each new JLP allocation is located in.
19. More allocations should have mixed uses included to offset the need to travel further distances for services and facilities.	As set out in Matter 6, the Councils have a modest quantitative employment land requirement. Therefore, the Councils do not consider it is appropriate to allocate further mixed use sites. Instead, the Councils have aligned the majority of growth to sustainable locations to ensure that key services and facilities are located as close as possible to new housing allocations.
20. The Plan needs to be clear how the volume of planning permissions granted after the base date have been taken into account.	Most major planning permissions granted after the 2018 base date of the Plan have been recognised as allocations within the Plan. Nevertheless, planning permissions will

SP04 – Spatial Distribution Main issue	Councils' brief response
	come forward for determination while the Plan is progressing to adoption and will be recognised as windfall development. For NP areas see question 4.8 above.
21. The assumed windfall allowance is not justified - representations for both higher and lower.	The windfall allowance is justified by the evidence base and is a balance of planning judgement. Recent and current windfall rates are high, but would be expected to reduce substantially when the Plan is adopted. Overestimating the windfall supply would offer less certainty for where growth is to be expected.

Matter 5

LP01 main issue

LP01 – Windfall Development in hamlets and dwelling clusters. Main Issues.	Councils' brief response
1. Support principle of enabling housing in hamlets and clusters.	Noted.
2. Reword para 1 as it should only be encouraged to convert derelict buildings and improve historic landscape.	The policy is considered positively prepared and contains appropriate safeguards to disproportionate growth in the less sustainable settlements. Restricting the policy to derelict buildings is considered to be an overly restrictive approach.
3. Policy should be strengthened to avoid harm on heritage assets, landscapes and protected trees.	Other policy provisions, such as LP19 – Landscape and LP21 – The Historic Environment address this.
4. Should apply to sites 'well related' to dwelling clusters and / or a defined hamlet.	Criteria set out in LP01(1b) is considered appropriate to safeguard inappropriate development in hamlets and dwelling clusters.
5. Policy should include provision for PDL in countryside to be developed.	The Councils support brownfield development in appropriate locations.
6. Policy should not require all criteria. Community views should be given greater weight add 'in some circumstances'.	All criteria considered appropriate and provide a consistent approach. Planning applications would include public consultation.
7. Policy should not be restricted to single or pair of dwellings.	Scale is considered appropriate to ensure development is proportionate and of a sustainable scale.
8. Definition of a 'defined clusters' should be amended. 10 dwellings threshold considered overly restrictive.	10 dwellings is considered appropriate to local context. Hamlets are identified in SP03, however the policy is flexible to recognise clusters of dwellings that effectively grow and may become hamlets during the lifetime of plan. See question 5.1
9. Policy is not positively prepared and should provide greater certainty.	The Councils' consider that the policy is positively prepared by encouraging small scale development within hamlets and dwelling clusters. See question 5.1
10. Clarity required over how cumulative impact will be considered.	This is a matter of planning judgement on case by case basis.
11. Clarity defining infill.	LP01(1c) states that infill is a plot capable of accommodating 1 - 2 dwellings on a parcel of land. LP01(1b) also provides further detail on suitable locations (e.g. not resulting in ribbon development). The Councils' consider that this provides sufficient clarity.
12. Impact on AoNB & biodiversity or geodiversity must be fully addressed and mitigated.	Provision in LP01(1d) and for AoNB protection in LP20 & bio/geo diversity in LP18.

LP01 – Windfall Development in hamlets and dwelling clusters. Main Issues.	Councils' brief response
13. Clarity is required regarding the fullest contribution to mitigation of climate change.	Policy LP25 provides further detail on measures how schemes can make the fullest contribution to the mitigation of climate change.
14. Policy should require M4(2) contributions.	Paragraph 13.04 of the JLP recognises that there is an ageing population with physical disabilities in the Districts, and that LP01 will support the delivery of M4(2) standards.

LP02 main issue

LP02 – Residential Annexes Main issues.	Councils' brief response
1. Policy should be stronger on sustainable energy requirements and require proposals to improve the energy performance of the entire dwelling.	Policy is considered appropriate. The Sustainable Construction and Design policy provides the detail to address sustainable energy requirements of development. See Question 5.2b.

LP03 main issue

LP03 – Residential Extensions and Conversions. Main issues	Council brief response
1. Proposals should improve the energy performance of the entire dwellings.	Sustainable construction and design policy addresses the energy performance of development – see question 5.3b
2. Policy should be extended to consider conversion of agricultural barns.	The policy is concerned with residential extensions and conversions – see question 5.3b.

LP04 main issue

LP04 – Replacement Dwellings in the Countryside. Main issues.	Councils' brief response
1. Policy lacks clarity as it depends on policy LP03. Delete 1e).	Policy is considered clear and justified – see question 5.4
2. Part 1d - the criteria regarding increasing number of dwellings on the plot needs clarity.	

LP05 main issue

LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries. Main issues.	Councils' brief response
1. Policy should explicitly resist back-land development and/or the loss of garden land.	It is not considered necessary for policy LP05 to specifically deal with backland development and the loss of garden land – see question 5.5.



LP05 – Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries. Main issues.	Councils' brief response
2. Policy needs consistent terminology regarding heritage assets.	The Councils consider that the policy is clear – see question 5.5b.

LP06 main issue

LP06 – Mix and Type of Composition Main issues	Councils' brief response
1. No justification/evidence for 50% M4(2) standards.	The Councils have sought to set out the evidence and justification for M4(2) standards is set out in OAN Topic Paper. See Question 5.6a
2. Request viability clause added into M4(2) requirement.	The whole JLP has been viability tested, including the M4(2) requirement. See Question 5.6a
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.	The Councils do not consider there to be evidence to justify a higher proportion of accessible and adaptable dwellings than that set out in policy.
4. Affordable housing requirement should not be repeated here. Also contains no viability clause as set out in other policies.	Affordable housing is an important component of the mix and type of housing, therefore it is considered appropriate to identify that affordable housing will be required. Flexibility is set out within SP02 and LP08(1) to enable the variation of affordable housing and commuted sum payments – see Matter 3 (Question 3.7c).
5. Insufficient flexibility. Regard must be given to viability, market signals and local circumstances in establishing housing mix.	Flexibility is set out within SP02 and LP08(1) to enable the variation of affordable housing and commuted sum payments – see Matter 3 (Question 3.7c).
6. Clarity requested if Housing Needs Assessments undertaken as part of Neighbourhood Plan are included.	Made Neighbourhood Plans are part of the development plan.
7. Object to removal of Permitted Development rights for bungalows.	The Councils consider it is appropriate to retain bungalows in perpetuity to ensure a mix of dwelling type/mix. See Question 5.6
8. Reference to supported and special needs housing should be removed from policy as it has its own policy (LP07).	Policy is appropriate to provide equitable treatment to meet all types of affordable need.

LP07 main issue

LP07 – Supported and Special Needs Housing. Main issue	Councils' brief response
1. Supported and special needs housing is needed in the area. Consideration should be	SP08 makes strategic provision for infrastructure provision.



LP07 – Supported and Special Needs Housing. Main issue	Councils’ brief response
given to the capacity of the Primary Care Networks.	
2. JLP should allocate sites for specialist housing accommodation.	As set out in question 5.7, The Councils consider that a criteria based offers flexibility and is the most appropriate method to take forward supported and special needs housing, in sustainable locations.
3. Edge of settlement sites should be allowed subject to criteria, to allow the JLP to meet needs.	Accessibility is a key consideration for supported and special housing, therefore it is considered that LP07(1a&b) offer suitable criteria for the provision of supported and special needs housing. See question 5.7.
4. Neighbourhood Plans should be able to set their own housing mix.	Once adopted Neighbourhood plans are part of the development plan.
5. Developments should be able to depart from Neighbourhood Plan housing mixes, if supported by sales and marketing information.	JLP sets out an approach to meet an identified District wide need.
6. M4(2) requirement is inconsistent with LP06.	LP07 addresses supported and special needs housing where it is deemed appropriate to set a higher requirement for M4(2), when compared to general housing in LP06. See Question 5.7c
7. Should require 5% of dwellings to meet M4(3) requirement.	The Councils do not consider there to be evidence to justify a requirement for M4(3) requirements. Policy already requires M4(2) dwellings, which is considered to be justified.
8. Planning conditions should be used to remove permitted development rights for bungalows, not planning obligations/legal agreements.	Planning obligations/legal agreements are considered appropriate, as they provide greater weight to protect them in perpetuity.
9. Object to removing permitted development rights on bungalows.	The Councils consider it is appropriate to retain bungalows in perpetuity to ensure a mix of dwelling type/mix. See Question 5.7
10. Settlement types set out in 1b should replicate the settlement hierarchy.	See Question 5.7 Modification is suggested for criteria 1b to state located within market towns and urban areas and core villages with good accessibility to local services and facilities (particularly health services).

LP11 main issue

LP11 – Self-Build and Custom-Build. Main issues.	Councils’ brief response
1. Policy should allow edge of settlement and outside settlement boundary self-build plots subject to criteria to meet need.	The Councils consider it appropriate to require self-build/custom-build development to comply with the relevant policies of the JLP. NPPF para 79 provides criteria for other locations.
2. Plan needs to demonstrate how it meets identified need for self-build plots.	The JLP meets the identified need for self-build plots as evidenced through the OAN Topic Paper (Document EP02) – see question 5.8.
3. Policy should be stronger on sustainable energy requirements.	Part 4 of the policy is considered appropriate. The Sustainable Construction and Design policy provides the detail.

Matter 6

SP05 Main issue

SP05 - Employment Land Main Issue	Council brief response
2. Protect high quality sites & identify new land and allow other sites to be redeveloped for alternative uses.	Policy provision made in SP05 & LP13. Additional land identification, over and above the strategic locations listed in SP05 (1), could undermine the diversity of the employment land supply. See question 6.1 & 6.2.
3. Amendment to supporting text para 9.14 - add reference to quantified jobs forecast and minimum employment land requirements.	The recent introduction of use classes E, F1 and F2 will have significant implications for employment land monitoring and baseline figures. The implications of this are currently being considered to inform the baseline supply and monitor changes. As a result of the changes the baseline and job forecast figures as set out in the evidence based studies are no longer considered appropriate.
4. Para 6 is unduly restrictive / or 6 should apply to BOTH new and existing sites with priority to safeguarding existing sites.	The policy is considered positively prepared. Para 6 is intended to be applicable to both existing and new employment sites. Para 6a sets out that proposals must demonstrate deliverability, that they would enhance provision which cannot be accommodated on existing employment sites.
5. Amendment to para 4 - remove use class reference on full, single or flexible use.	See question 6.2 (d).
6. Amendment to supporting text para 9.18 - Mill Lane, Stowmarket (Gateway 14) - extend site to align with Enterprise Zone (EZ) and remove text regarding area of developable land.	Para 9.18 takes account of the EZ designation. In consideration of the modest employment land requirements it is not considered appropriate to allocate the entire EZ designation which is considerably larger than the allocation.
7. Lion Barns site (Needham Market) & Eye Airfield site - transport & gas transmission line impacts.	Constraints noted. Site is existing & policy provision is made for assessment of highway impacts.
8. Policy modification proposed to address the impacts of poultry uses around Eye Airfield and surrounding area.	Add footnote to criteria 6 (b). This would be addressed through amendment to validation checklist and would not require JLP policy.
9. Wherstead - support & expand the current site allocation and refer to map Enterprise Zone designations.	SP05 makes flexible provision for appropriate site expansion, subject to criteria. EZs are not JLP designation (noted in 9.18).

10. Amendment to para 1 b) and 6 d) - Chilton - amend name of site & heritage consideration to having regard.	Noted. The context for heritage consideration is considered appropriate in SP05.
11. Amendment to 1f) - deallocate part of Lady Lane (Hadleigh) allocation at boundary.	The site is considered to be part of the existing employment area and should be retained for that purpose.

SP06 main issue

SP06 – Retail and Town Centre Use Main Issue	Council brief response
1. 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.	Other SP policies within the JLP address the topic specific issues, including infrastructure and climate change. All policies in the JLP should be considered as relevant to specific proposals. Additionally there are location specific strategies (Stowmarket and Sudbury) and neighbourhood plans (inc. Eye and Needham Market & Hadleigh [in progress] which set out detailed town specific strategies.
2. Extend Stowmarket boundary to include submitted sites - Land between Navigation Approach, Gipping Way & Iron Foundry Road.	This is a site identified in SP05 and is primarily for employment purposes.
3. 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.	See question 6.5.
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.	The boundary for Eye shall be as defined in the Neighbourhood Plan. See Q 6.5.

SP07 main issue

SP07 - Tourism Main Issue	Council brief response
1. No strategy to support tourism in Suffolk.	Policy provides a framework to support the sustainable enhancement and development of tourism assets in the area.
2. Modification proposed to include considerations of impacts on tourist economy (positive or negative) in planning balance.	LP15 provides a framework for detailed consideration of tourism proposals. LP13 sets out safeguarding of economic opportunities, which could include tourism. LP31 services and facilities makes provision for new, and loss of services and facilities, which could be relevant to tourism.



LP12 main issue

LP12 – Employment Development Main Issue	Council brief response
1. The policy should recognise the importance of other employment generating uses and their suitability within designated employment areas.	The policy is applicable to all employment use. See question 6.3 (b).
2. No definition for what is "employment use."	See question 6.3 (b)
3. Drafted policy defeats purpose of Class E.	
4. Should not create a presumption in favour of small scale employment use.	This is considered to be a key part of the economy and the intention of the policy is to manage impacts effectively.
5. Wording about predominately residential curtilage needs 'within' inserted.	If the Inspectors consider that the change is needed, the Councils would be content to propose as a modification.
6. Add 4. Live/work units will be supported where they do not conflict with other policies.	LP12 (1) provides a framework for consideration of new employment development and LP12 (3) for change of use within a residential curtilage. Other policies set out a framework for consideration of new residential proposals (dependent on location).
7. Clarification needed on the use of 'significant'. How will this be assessed?	This would be a matter of planning judgement.
8. Add further criteria to promote flexibility of employment provision consistent the geography of Ipswich Fringe, Market Towns or the A12/A14 corridors and subject to impacts upon the environment and residential amenity.	SP05 addresses the spatial distribution of strategic employment use.

LP13 main issue

LP13 – Safeguarding Economic Opportunities Main Issue	Council brief response
1. Para 14.06 refers to inherently unsuitable, but this is no longer included in para 2 of the policy.	The policy is considered appropriate and provision is made (para 2 a) to establish whether a business is inherently unsuitable.
2. Policy needs greater recognition of flexibility for other use types, e.g. retail etc.	LP13 (b) includes other commercial, employment, business or community uses.
3. Para 1 - Needs definition of 'business' 'commercial' or 'employment' activity & sites.	As relevant to Use Class definitions.
4. Para 2 - the minimum period of marketing should be 12 months for larger schemes.	Noted - 6 months considered reasonable.
5. Recommend deletion of part (3) of the policy concerning relocation which would result in full or partial loss.	Disagree. This is considered necessary so that the Plan makes adequate provision for economic requirements.
6. Para 3 - Delete the requirement for contributions to help off-set loss of employment	The requirement for contributions is considered appropriate to local context.



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.	2 concerns demonstrating use cannot be retained. 3 concerns relocation.

LP14 main issue

LP14 – Town Centre and Retail Main Issue	Council brief response
1. Add Para 4 - An element of small affordable retail units will be required on developments exceeding 1000m2.	There is no evidence to justify an affordable contribution.
2. Clarification is required, as no specific town centre boundaries are defined for Needham Market, Eye and Debenham.	See Q 6.5.
3. Lower threshold.	2500m2 accords with NPPF para 89
4. Part 2a) should include clarity to support Main Town Centre uses.	“Will be encouraged” is considered appropriate wording as each application will be considered on its merits in context of policy.

LP15 main issue

LP15 – Tourism and Leisure Main Issue	Council brief response
1. Delete 1a) to g) - should not simply be a tick list which must be satisfied as overall benefit is to achieve further development.	Matters must be considered on balance, taking account of local sensitivities.
2. delete criteria e and f.	These criteria are considered appropriate.
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.	Viability for residential accommodation is not considered appropriate criteria. Provision is made for flexible live/ work units in LP12 (3)

LP16 main issue

LP16 – Countryside Tourist Accommodation Main Issue	Council brief response
n/a	n/a

Matter 7

SP09 main issue

SP09 – Enhancement and Management of the Environment. Main issue	Council brief response
1. Policy amendment to require HRA under all relevant circumstances.	The Suffolk Coast Recreational Avoidance Mitigation Strategy (RAMS) already establishes mitigation/ projects and contributions required.
2. Need to improve baseline data and availability of data to inform JLP.	See Question 7.1
3. A policy requiring appropriate payment of the Suffolk Coast RAMS tariff should be embedded into the Plan.	Already embedded within policy supporting text and para 2 of SP09.
4. Clarify Zone of Influence and modify map to include Ipswich and East Suffolk.	See question 7.1b.
5. 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.	Biodiversity net gain is important to the Councils and a targeted approach may be effective and measurable in achieving goals.
6. Caveat policy for where development proposals cannot protect the networks of habitats, suitable mitigation should be part of the scheme.	This is not considered an appropriate approach.
7. Policy amendment to para 3 to ensure relevant biodiversity projects are incorporated.	Reference to 'relevant biodiversity projects' could be considered.
8. Policy amendment to para 3 to clarify the approach.	The Councils consider the policy to be written and worded appropriately.

SP10 main issue

SP10 – Climate Change Main issue	Council brief response
1. Include a statement on what is expected on large developments for climate change.	Policy is applicable to all scales, provision within LP25 and numerous detailed local policies
2. Require developers to build sustainable carbon-neutral housing.	Local Plan policy LP25 and LP27 provides support for decentralisation of energy and low carbon development, no evidence to justify requirement for carbon neutral
3. State measures for carbon storage & map carbon sinks.	Detail is in LP18, LP19 and LP30 & Suffolk Biodiversity Action Plan identifies carbon sinks. The Environment and Climate Change Task Force will embed principles within the Suffolk Design Charter.



SP10 – Climate Change	Council brief response
Main issue	
4. Provide more local guidance in terms of the expectations of the development industry in respect of climate change.	See Question 7.2

LP17 to LP29 main issue

Policy and Main issues	Council brief response
LP17 – Environmental Protection	
1. Object - strategic and housing policies do not give priority to the reuse of brownfield land.	See Question 7.3
2. Should be removed, as could be used as a barrier against sustainable greenfield sites.	
3. Policy should require more than a 'contribution' to making more efficient use or reuse of existing resources.	The Councils consider that the wording is appropriate.
4. Light pollution - Saved BDC Policy EN22 should be reinstated. Current policy fails to reflect NPPF para 180.	The Councils consider that LP17 is appropriate and consistent with national policy.
5. Should be more explicit that impact may be within Ipswich, and that air quality assessments should consider AQMAs within Ipswich.	Policy seeks to prevent, or where not practicable, reduced air pollution. This is relevant to a wider area, including AQMAs both within and outside the Plan area where relevant.
6. Reference to 'National and International Standards' is required through a footnote or reference.	Considered that the policy is appropriately worded and is to be read in conjunction with legislation and guidance. See question 7.3
7. Remove requirement to 'enhance' groundwater, surface water features etc.	The Councils consider that it is appropriate to include 'enhancement' within the policy, as some watercourses have been identified as being of poor quality (see Question 7.3)
8. Policy should refer to the requirement for waste management plans for new developments and include consideration of cumulative impacts.	Accreditation to BREEAM Standards within LP25, addressed construction and operational waste.
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.	JLP policies set out a package of environmental measures which do not act as a ceiling. JLP monitoring will review the effectiveness of the plan over its lifetime.
LP18 – Biodiversity and Geodiversity	
1. Not consistent with NPPF as it places enhancing habitats as the first step.	The Councils propose a modification to comply with the NPPF (see question 7.4).



Policy and Main issues	Council brief response
2. For clarity policy should state that locally designated sites such as County Wildlife Sites are included	County Wildlife Sites are included within the Policy. See question 7.4.
3. County Wildlife Sites should be mapped and safeguarded.	
4. Request explicit reference to the need for biodiversity enhancements to be targeted at locally relevant, declining habitats and species.	Biodiversity net gain is important to the Councils and a targeted approach may be effective and measurable in achieving goals.
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.	Noted. It is considered that the wording for 18c) is appropriate.
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.	The Councils are taking a proactive approach in line with NPPF Para 170 a) and the emerging Environment Bill (see question 7.4).
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.	
9. 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.	The metric used will be in line with current practice and or as identified within the Environment Bill (see question 7.4).
10. Off-site offsetting must be situated close to the development site.	Noted. Agree in principle that it should be on the most locally appropriate area.
11. need to state that 'biodiversity offsetting' will be an exceptional step.	Provision within policy to ensure Biodiversity Hierarchy
12. Remove part 2f of the policy, as this is addressed in Part 3 of the policy.	LP18 2f) applies measures to assist recovery of species whereas part 3) refers to where development has potential to have an adverse impact upon protected species therefore the Councils consider the inclusion to be appropriate.
13. Need to proactively map protected areas, wildlife links and stepping stones.	Biodiversity mapping and subsequent net gain is important to the Councils and a targeted approach may be effective and measurable in achieving goals.
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.	

Policy and Main issues	Council brief response
16. Plan needs to be clear that any habitat found to have sensitive species must be left undisturbed and protected.	Noted. Policy aims address habitats and species and require demonstration adherence of the biodiversity hierarchy. Therefore, the Councils consider the wording to be appropriate.
LP19 – Landscape	
1. Modification to background text suggested to strengthen requirements.	The Councils propose a minor modification to paragraph 15.25 of the plan. See question 7.5
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.	The Councils do not consider it appropriate to retain these designations in the JLP (see question 7.5).
3. Policy should include reference to local landscape designations in adopted NPs.	The Councils do not consider it appropriate to refer to Neighbourhood Plans (NPs) as made NPs are part of the Development Plan (see question 7.5).
4. Amend to require a commitment to implement specific landscape mitigation measures identified in the LVIA at the earliest possible opportunity.	The policy is considered appropriate. See question 7.5
LP20 – Area of Outstanding Natural Beauty	
1. Modification requested to background text to refer to Valued Landscapes within AONB Project Areas	The Councils propose a modification to para 15.27 of the JLP (see question 7.6).
2. Policy should be more restrictive and include AONB Project Areas.	Policy is to be read in conjunction with NPPF and has been positively prepared. See Question 7.6
3. Major development should normally be refused in AONBs, as per NPPF.	
4. 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.	Noted However, Policy LP20 should be read in conjunction with the other policies of the plan. Policy LP19(2) sets out the Councils expectations
5. Modification requested to conserve the distinctiveness of the AONB and reference to AONB Management Plans	Noted. A modification could address this. See Question 7.6
LP21 – The Historic Environment	
1. Conservation areas should be specifically mentioned.	See Question 7.7
2. Policy should refer to the identification of non-designated heritage assets in NPs.	See Question 7.7
3. Modification requested to clarify that different weight to be granted to impacts on	See Question 7.7

Policy and Main issues	Council brief response
designated and non-designated assets - as per NPPF.	
4. Para 1 - depending on the nature of the works/development proposed should be removed.	The NPPF requires a proportionate heritage statement. The Councils believe the wording is in line with NPPF requirements.
5. Criteria set for heritage statements is excessive and above NPPF requirements.	Requirements are considered appropriate to understand the potential impact of schemes on the historic environment.
6. Should be expanded to cover full extent of NPPF para 192.	The Councils consider that the policy is compliant with the NPPF and paragraph 192.
7. Re-use of heritage assets should not require compliance with relevant JLP policies.	Provisions of the Planning and Listed Buildings Act apply to all heritage assets
8. 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.	The NPPF sets out the considerations of such cases under paragraph 202 ('enabling development'). It is not considered appropriate to replicate this requirement in policy.
9. Policy is too subjective, provides no locally specific guidance. Needs to respect community values and identify the districts intentions for heritage preservation.	Policy is considered suitable and appropriate. Parishes may wish to establish specific localised/parish level circumstances through Neighbourhood Plans.
LP22 – Change in Land Use for Equestrian or Other Animal/Rural Land Base Uses	
1. Policy should require significant highway impacts to be mitigated and ensure test of highway acceptability is in line with NPPF.	Noted. Wording proposed by SCC is appropriate and in line with NPPF and the main transport JLP policies.
LP23 – Agricultural Land to Residential Garden Land	
1. 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.	The policy is considered appropriate and justified.
LP24 – New Agricultural/Rural Buildings in the Countryside	
1. Amend - new agricultural development connected with the poultry industry is that it will follow transport evidence modelled capacity.	A modification is proposed regarding traffic impact – see Question 7.10.
2. Policy should be amended to provide greater clarity as to what evidence and justification is required.	Noted. To be read in conjunction with NPPF paras 77-79 and 83-84, and other policy requirements of the Plan.

Policy and Main issues	Council brief response
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).	A modification is proposed regarding traffic impact – see Question 7.10
4. Does not provide an adequate means to control the development of an increasing number of Intensive Poultry Units.	Policy is considered robust and sound. There are also a number of supporting policies within the JLP to ensure proposals will be considered appropriately eg. CEMP requirements in LP25
5. Does not address cumulative or in combination concerns regarding proliferation and over concentration of IPU's and the resultant growth of HGV traffic on an inadequate rural road network.	
LP25 – Sustainable Construction and Design	
1. Recommended rewording for para 15.53 to acknowledge expiry of zonal charge Anglian Water levy.	Noted and agreed in principle. The Plan could be amended for this.
2. Amend wording to say "encouraged" not "required."	The Councils consider that the wording is appropriate and is fundamental to achieving the objectives for climate change etc.
3. Basic renewable energy generation systems should be mandatory, not just encouraged.	The Councils consider that the wording is appropriate and flexible to allow for innovation
4. Not considered appropriate for the Councils to set different targets or policies outside of the Building Regs.	Written Ministerial Statements and NPPF allows for local plans to set different standards. See Question 7.11
5. The policy should require compliance with Future Homes Standard and reject gas heating.	Future Homes Standard is currently out to consultation and is expected to be implemented through the Building Regulations. The policy does require contributions to lowering CO2.
6. The concept of 'consequential improvement' should be included.	This is outside the remit of the Local Plan - required by regulation 28 of the Building Regulations
7. Does not go far enough to achieve the vision of a carbon neutral borough by 2030.	The Plan encourages the move to environmental improvement and gain. However, the policies must also have regard to social and economic objectives and be viable.
8. Amend para 2f to add - High embodied carbon (e.g. timber) will be encouraged.	The Councils have proposed to simplify interpretation of policy LP25 by amending 3f) to ensure development incorporates sustainable building materials will be encouraged . see question 7.11b)
9. "Policy part 3 should be reduced to apply to 10 or more dwellings and to comply with current Building Regs on reduction of CO2	The rewording would not achieve Councils vision for a low carbon future.

Policy and Main issues	Council brief response
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.	The Councils believe the Policy is justified. See Question 7.11
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.	Noted however para 6 is to be retained as it encourages greater water efficiency
14. Criteria 3a) and 3b) to only be applicable to major development and reduce the standards being sort throughout the rest of the criteria.	The rewording would not achieve Councils vision for a low carbon future.
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.	Discussion and consideration of sustainable design and construction issues should take place at the earliest possible stage in the development process. This will provide the greatest opportunities for a well-designed and constructed development and at the same time enable costs to be minimised.
16. Highest BREEAM standard should be required.	The policy requires a minimum of "very good" further standards must be subject to viability testing. The Councils consider that this is appropriate.
17. Amend para 6 - Delete 'wherever feasible'.	The Councils consider that the wording is appropriate.
18. para 3c) needs to be split into two parts.	Noted. This may improve clarity.
19. A specific commitment should stipulate high quality fibre optic broadband as provision for any development. Adequate provision for future development should also provide and empower citizens to participate in active travel.	Addressed in Infrastructure matters.
LP26 – Design and Residential Amenity	
1. NPs have design codes and policy should ensure these are used in determining planning applications. No recognition of NP's design work.	Made Neighbourhood Plans are part of the development plan. Neighbourhood Plans are referenced within part 3 of the policy.
2. Should encourage Design Codes, with larger schemes reviewed by an Independent Design Review Panel.	See question 7.12 above.
3. No reference to enhancing the existing character and context.	Noted. The policy should read alongside NPPF para 130 and is considered appropriate.

Policy and Main issues	Council brief response
4. Consideration should be given to a requirement for dwellings to incorporate live/work spaces, to reduce the need to commute.	A suitable mix of dwellings will be required on a case by case basis. Policies of the plan overall seek to reduce the need to travel, such as the locations of growth and transport mitigation – also see question 6.3c (Matter 6).
5. If natural features such as trees/hedgerows are lost they should be replaced.	Criteria 2c seeks to protect and retain these features. Policy should be read in conjunction with the other policies of the plan.
6. 2e - 'exceptional design' and 'sensitive area / landscape' need to be defined. Requiring developments of all scale to do this is onerous.	Noted. The policy should read alongside LP19 and NPPF para 79 and is considered appropriate.
7. No evidence to justify space standards.	See question 7.12
8. Clarity required on term 'where appropriate' in part 2 (k).	The policy is written in a flexible manner – see question 7.12.
9. M4(2) requirement is within other policies, not clear what schemes criteria would apply to.	The Councils propose a modification to remove LP26(1)(f) see question 7.12.
10. This policy offers more flexibility than LP06. This part should be retained and LP06 requirement removed.	
11. Remove last sentence of part 3 of the policy as maintain and improve are two different requirements.	Noted. The Councils consider the policy to be justified and effective.
LP27 – Energy Sources, Storage and Distribution	
1. Remove part 2 of the policy.	The Councils consider that the wording in policy is sound, justified and clear and is supported by the other JLP policies – see question 7.13
2. Part 1, the current wording dealing with impact fails to consider avoidance of harm and therefore needs to be revised.	
LP28 – Water resources and infrastructure	
1. Amend part 1 for clarification regarding appropriate water efficiency measures.	Wording is considered appropriate. Policy has been developed through engagement with Environment Agency, water bodies and the Lead Local Authority – see question 7.14.
2. Amend part 1 to not require conformity.	
3. Part 3 is not considered justified as it duplicates other legislation.	
4. Propose listing of specific recycling measures.	The Councils consider that the wording is appropriate. Measures would be considered on relevant technologies.
LP29 – Flood Risk and Vulnerability	
1. Remove reference to grey water recycling from point 7.	Modification proposed – see answer to question 7.15
2. Amend part 4 to include discussion with relevant drainage authority. Amend part 5 to delete considerations for cumulative impacts.	Policy is considered suitable. Cumulative impacts are an important factor that needs to be taken into consideration.

Policy and Main issues	Council brief response
3. Policy requires clarification for minor development and the LLFA.	Policy has been developed through engagement with the Environment Agency, the water bodies and the Lead Local Flood Authority.
4. Policy amendment to part 3 to clarify avoiding and mitigating risks for SuDS.	Modification proposed – see response to question 7.15.
5. Overlap between LP29 and LA078 part IX. - Requests IX to be removed from LA078, no amendments to LP29 requested.	Policy LP29 is considered appropriate. Site specific matters to be addressed in Matter 9.

Matter 8

SP08 main issues

SP08 – Strategic Infrastructure Provision	Council brief response
1. Policy wording suggestion to include Rail provision.	Should the Inspector consider further clarification is required in respect of the transport corridors, the Councils would be content propose a modification. See Question 8.1 c)
2. 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.	The Councils consider that supporting the overall delivery of the ISPA Transport Mitigation Strategy is reasonable at the current time, as set out in the Statement of Common Ground. Work is in development on implementation and strategy details. See Question 8.1 c)
3. Objection to the strategy to deliver a new primary school in Woolpit area.	Through the production of the IDP, the Councils have worked collaboratively with Suffolk County Council to deliver sufficient primary school provision. This approach is considered justified.
4. Regulation 122 of the CIL test should be followed.	The Councils apply the relevant CIL Regulations - See Question 8.1 c)
5. Policy wording amendment referring to Para 2 to include the words "subject to viability".	The Councils consider that the wording of the policy is appropriate.
6. Infrastructure provision should be frontloaded before development.	The timing of the infrastructure provision is to be considered on a scheme by scheme basis, including consultation with the relevant providers (e.g. Suffolk CC Education)
7. Suffolk Constabulary require specific reference to police infrastructure within policies and site allocations.	Footnote 21 refers to the IDP to set out the detail. Provision of police facilities has been considered through the IDP, and is to be considered on a case by case basis, using the relevant infrastructure policies of the JLP.
8. The policy is considered in conflict with SP05, LP24 and LA099 concerning intensive poultry units serving Cranswick.	See Matter 6 Employment.

LP30 main issues

LP30 – Designated Open Spaces	
1. Plan should either identify Local Green Spaces or refer to Local Green Spaces in post examination or adopted NPs.	Made and up to date NPs are part of the Development Plan therefore there would be no need to repeat. Further any new designations in emerging NPs would not be able to be presented in the JLP. See Question 8.2



2. Clarity is required regarding Council preference in paragraph 2 of the policy.	See Question 8.2.
3. Unclear how this policy interacts with CIL payments.	
4. Policy should acknowledge viability considerations will be taken into account in open space provision.	The JLP is supported by a whole plan viability study, which has assessed the plan and its policies to be viable. See Question 8.2.
5. Object to standards set out in Open Space Assessment, which are too onerous and complex.	The Open Space Assessment is considered to be a robust assessment in line with national guidance. See Question 8.2.
6. Policy lacks clarity, unclear what requirements a development should include. Requirements should be discussed and agreed at pre-application stage.	Policy requires compliance with Open Space Assessment. See Question 8.2.
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.	The Councils considers that the policy wording is appropriate to ensure that the policy is future proofed in the case of new evidence being produced. See Question 8.2.
8. Open space deficit should be addressed through a Council Strategy not from new development.	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 main issues

LP31 – Services and Facilities Within the Community	
1. JLP should require shops are marketed for 1 year prior to conversion to a residential unit.	Part 3 of the policy requires a sustained marketing period of 6 months. This is considered to be appropriate and balanced, and in line with other JLP policies.
2. Remove the reference to 'valued' and replaced with "not needed or required."	The Councils consider the wording is appropriate although recognise Assets of Community Value are not mentioned in the policy.
3. Include consideration of Assets of Community Value within part 3b of the policy.	

LP32 main issues

LP32 – Safe, Sustainable and Active Transport	
1. Seeks reprioritisation of criteria a and b, and insert text to address cross boundary matters where appropriate.	The Councils consider that the wording and presentation of the policy is appropriate. See Question 8.4



LP32 – Safe, Sustainable and Active Transport	
2. "Policy Part 3 needs more clarity regarding 'where relevant' aspect."	Policy is considered appropriate as development proposals will be considered in their own merit.
3. Amend part 4 to include linkage to services.	Should the Inspector consider further clarification is required, the Councils would be content to propose a modification to LP32(4) referring to 'including linkages to services'. See Question 8.4
4. Part 1 - Policy needs to identify what constitutes a 'significant increase in transport movements.'	Wording is considered appropriate, and indicative thresholds are provided in relation to transport statements / assessments.
5. Amend part 2 to remove the requirement for maximising uptake.	The policy wording is appropriate and intently states to 'maximise the uptake in sustainable and active transport...' with intention of strengthening the policy wording. Policy has been produced in conjunction with the Local Highways Authority.
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.	Future alternative transport innovations is covered in the supporting text at para 16.16 of the JLP, the Councils therefore considers that strategies and investments for supporting sustainable transport and development patterns are aligned, and this includes all modes of sustainable transport, such as electric modes and encouraging a greater use of bus and rail transport.
7. Part 3h) of the policy needs to make reference to cycle parking.	Should the Inspector consider further clarification is required, the Councils would be content to propose a modification. See Question 8.4
8. Part 3i)- Delete requirement for electric vehicle changing points.	The policy wording is considered appropriate and generally refers to 'in line with the current parking guidance' which is flexible to take account of future guidance and regulations.
9. Policy needs clarity with regard to requirements for parking provision (Part 3h).	The Suffolk Guidance for Parking (as referred in the policy) provides the standards to be met by development proposals.

LP33 main issues

LP33 – Manufacturing Infrastructure Provision	
1. The IDP supporting LP33 needs clarity regarding the estimated infrastructure project costs.	The IDP is iterative and updated annually to ensure that costs can be updated and owned as more information is known. Costings and funding gaps are informed through ongoing collaborative work with key infrastructure providers who have signed Statements of Common Grounds to ensure delivery of the prioritised projects. Joint working with Suffolk County Council and Highways England.

LP34 main issues

LP34 – Health and Education Provision	
1. 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.	Should the Inspector consider necessary, the Councils would be content to propose a modification to LP34(2) to include health facilities. See Question 8.6 b)
2. 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.	The Councils consider that this is appropriately addressed in para 16.21 of the plan. See Question 8.6 b)
3. 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.	The Councils considers that the policy is appropriate, and that part 1 a, b and c explains well the cases when development proposals, other than education/health in this context, would be considered.
4. Recommendation for deletion of sentence referring to the NPPF and pre-application advice, in Part 3 of the policy.	Wording is considered appropriate.
5. Para 16.22 proposed amendments to clarify healthcare assessment are matched to proposed growth plans.	The Councils consider that paragraph 16.22 of the Plan, and Policy LP34 is appropriate. See question 8.6

LP35 main issues

LP35 – Developer Contributions and Planning Obligations	
1. Policy does not address NPPF para 34 requirements and instead relies on Part 4 - 'relevant documents endorsed by the council.	JLP policies address NPPF para 34 requirements and reference to relevant documents (which would include the IDP) is considered appropriate as demands and evidence may change.



<p>2. Greater clarity over what contributions are expected from LS01 sites is required to make this policy more effective.</p>	<p>The Councils consider that the policy and the plan offer sufficient clarity relating to infrastructure contributions. Policy LS01 requires compliance with the relevant plan policies and Infrastructure Delivery Plan. Site specific matters to be addressed under Matter 9.</p>
<p>3. Policy LP35 should make allowance for the viability of schemes to be considered.</p>	<p>A viability assessment has been carried out to assess the viability of the policies and the site allocations proposed in the JLP (Document ER02). The Councils considers that viability considerations have been addressed at plan making stage as required by the NPPF, and the planned growth approach proposed in the JLP is able to deliver the required infrastructure.</p>