



Turley

Babergh and Mid Suffolk District Council Local Plan Examination

Matter Statement 1a Legal Compliance

Response on behalf of Pigeon Investment Management Ltd and their Landowners

June 2021

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1. Introduction

- 1.1 This Hearing Statement has been prepared by Turley, on behalf of Pigeon Investment Management Limited ('Pigeon') and their Landowners, in respect of a number of land interests within both the Babergh and Mid Suffolk Districts.
- 1.2 Turley has previously submitted representations in response to the Sustainability Appraisal (SA) accompanying the Babergh and Mid Suffolk District Councils' (BMSDC) Joint Local Plan Consultation Document in April (SA Scoping) and December (Regulation 19 SA) 2020.
- 1.3 A number of Pigeon's sites are now included within the Plan as draft allocations. These are detailed below. Further details regarding the status of the sites and their proposed schemes are included in the representations that Pigeon made to the Regulation 19 Consultation (December 2020):
 - LA042 - Land at Tye Farm, Great Cornard;
 - LA047 - Land at Turkey Hall Lane, Bacton;
 - LA012 - Land north of Burstall Lane and west of B113, Sproughton;
 - LA001 - Land East of Norwich Road, Barham; and,
 - LA002 - Land North of Church Lane, Barham.
- 1.4 Whilst Pigeon are very encouraged by the proposed allocation of some of the sites identified above, they have through previous representations strongly urged the Councils' to give further consideration to the allocation of the following sites:
 - Land North of Springlands Way, Sudbury;
 - Land North East of Heath Road, Woolpit;
 - Garage Field, Land to west of the A137, Wherstead;
 - Walled Garden and Clock Paddock, Wherstead;
 - Suffolk Leisure Park, Wherstead; and,
 - Stevins' Site, Wherstead.
- 1.5 Pigeon continues to support the thrust of the emerging Joint Local Plan, taken as a whole, but advocates a number of positive changes to strengthen the overall soundness and deliverability of the emerging Plan. In particular, the Councils' housing requirement has increased considerably, therefore in order to significantly boost the supply of housing land and delivery in the two districts and support economic growth, the Plan needs to ensure that it identifies 'deliverable' sites, in sustainable locations.

- 1.6 This must be sufficient to provide a continuous delivery of new housing and employment land over the Plan period where there is an identified need.
- 1.7 Pigeon has therefore requested the right to participate in the relevant Matter 1a Hearing Session to support the legal compliance of the plan.

2. Matter 1a – Legal Compliance

Q1.4 . Does the Sustainability Appraisal (SA) provide a comprehensive and robust basis to inform the strategy and contents of the plan, particularly in terms of:

(a) its assessment of the likely effects of the plan’s policies and allocations?

(b) its consideration of reasonable alternatives, including the nine spatial strategy options?

[Note: This question focusses on the legal compliance of the SA in broad terms. The implications of the SA for the soundness of the plan is considered under other Matters.]

2.1 For England the relevant legislation and guidance with respect to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is;

- Environmental Assessment of Plans and Programmes Regulations 2004 (hereafter referred to as The SEA Regulations); and
- National Planning Practice Guidance (NPPG). Strategic environmental assessment and Sustainability appraisal. (<http://planningguidance.communities.gov.uk/>)

2.2 In its current form, Pigeon believe that the SA accompanying the Joint Local Plan (JLP) is fully compliant with The SEA Regulations and guidance. Our representations in April (SA Scoping) and December (Regulation 19 SA) have confirmed its compliance with the SEA Regulations but has provided suggestions to improve the soundness of the SA which will be addressed within our Matter 4 Hearing Statement.

2.3 Schedule 2 of The SEA Regulations¹ sets out the information required for an Environmental Report (The SA Report). Pigeon has reviewed Schedule 2 against the Pre-Submission version of The SA (A03) and considers that it meets these requirements in full.

2.4 Article 8 of Schedule 2 of the SEA Regulations is of particular interest to this examination as a number of representations have challenged the SA’s approach to the assessment and selection of *reasonable alternatives* for policies and specifically spatial distribution options and sites for allocations. Article 8 of The SEA Regulations states that the Environmental Report must provide:

An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

2.5 Pigeon has previously provided representations with respect to the assessment of the spatial distribution policies and the residential and employment allocations and

¹ <https://www.legislation.gov.uk/uksi/2004/1633/made/data.pdf>

therefore we shall continue to provide representations on these issues within this Matter Statement.

- 2.6 With respect to the assessment of all other aspects of the plan (policies and spatial vision etc) Pigeon believes the SA to be in compliance with the SEA Regulations and guidance.

Assessment of potential residential and employment allocations (reasonable alternatives)

- 2.7 The SA Scoping and Regulation 19 SA representations provided by Pigeon recommended that the following amendments to the site selection methodology be undertaken in order to improve the robustness of the SA and better reflect the rural nature of the districts:

- *Amendment of the SA Framework to recognise the rural nature of the district and the differences between employment and residential sites; and*
- *Incorporation of a second stage assessment to recognise the provision of mitigation and enhancements to recognise that some site proposals will be able to incorporate measures that mitigate impacts and / or enhancement measures or other public benefits (such as provision of strategic infrastructure) that would ensure they can be made sustainable as per paragraph 103 of the NPPF. This is especially important in rural areas and will also ensure the SA is better aligned with other aspects of the Councils' evidence base and in particular its Infrastructure Delivery Plan.*

- 2.8 Whilst Pigeon firmly believes that the implementation of these representations would enhance the robustness of the SA and soundness of the Plan, these issues do not challenge the legality of the process or Pre-Submission document (A01).

- 2.9 Pigeon believes that the SA assessment for the selection and rejection of reasonable alternatives for residential and employment allocations is compliant with the SEA Regulations for the following reasons;

- All potential allocations were first assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA) to identify sites that were both suitable and deliverable.
- All sites were then assessed to the same level of detail by the SA as set out in Section 6 of The SA (A03) with the results presented in Appendix 3 of The SA. The results clearly present the likely environmental effects of the different reasonable alternatives using a consistent 'policy-off' (i.e. without mitigation) appraisal.
- The reasons for selecting and rejecting the reasonable alternatives are clearly presented in Appendix G of The SA.
- Paragraph 6.21 of The SA confirms that the allocation of sites was based on a wide range of evidence including planning judgement exercised by BMSDC planning officers.

2.10 With respect to the statement within Paragraph 6.21 of The SA , Pigeon believes that the recommendations made within Section 4 of their SA Scoping Representations (**Appendix 1**) are particularly valid and demonstrated through the site selection process;

- *Pigeon consider that it is important that Local Plan officers exercise their planning judgement to look at potential residential and employment allocations in terms of a range of considerations in addition to the sustainability criteria including;*

- (i) the scale of an allocation and its delivery capabilities;
- (ii) whether sites can support the provision of strategic infrastructure (such as through the provision of schools and transport improvements), which may also be identified as part of the Infrastructure Delivery Plan;
- (iii) the ability of a site to meet community needs/aspirations;
- (iv) whether sites can support and improve the vitality and sustainability of rural centres;
- (v) the ability of a site to address climate change matters; and,
- (vi) the ability of an allocation to 'deliver' in a straightforward and timely manner and be deliverable and viable in accordance with the NPPF.

2.11 In summary, the selection of suitable employment and residential sites for allocation should be based on a range of evidence base studies and considerations including but not limited to the SA. Such an approach is entirely consistent with the SEA Regulations and guidance.

The consideration of reasonable alternatives, including the nine spatial strategy options

2.12 Section 5 of The SA (A03) presents the methodology and findings of the assessment of the nine options for the spatial distribution of new development within the two Districts.

2.13 In response to the Regulation 19 SA, Pigeon submitted representations with respect to this process which broadly supported the assessment process and the decision to select a hybrid spatial strategy option.

2.14 With respect to the compliance of this process with the SEA Regulations and relevant guidance, Pigeon make the following comments;

- The nine spatial strategy options are clearly presented within The SA².
- The assessment of these options is undertaken to the same level of detail and clearly presented within Table 5.1 and summarised within Paragraphs 5.21-5.34 of The SA.

² Document Reference A03: Page 47.

- The decisions to select the hybrid option consisting of Option 1 (Ipswich Fringe), Option 2 (Market Towns and Urban Areas) Option 3 (Core Villages) and Option 6 (Sustainable Transport Corridors) is clearly presented for consideration by the reader. Equally the reasons for rejecting the remaining five options are present within the summary text.

Conclusion

- 2.15 In summary, Pigeon believes that the assessment and selection of the nine spatial strategy options are in accordance with The SEA Regulations and, whilst modifications could be made in order to improve soundness, there are no reasons to doubt its legal compliance.

**Appendix 1: Representations to the
Sustainability Appraisal
accompanying the Babergh and Mid
Suffolk Local Plan (Regulation 19)
Consultation**

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Client

Pigeon Investment Management Ltd

Our reference

PIGC3024

December 2020

Introduction

1. These representations have been prepared by Turley on behalf of Pigeon Investment Management Ltd ('Pigeon') and their Landowners, in respect of a number of land interests within both Babergh and Mid Suffolk.
2. These representations are provided in response to Babergh & Mid Suffolk's (the 'Council') consultation on the Sustainability Appraisal (hereafter referred to as the SA) Pre-Submission Version of the Joint Local Plan 2018 – 2037.
3. Pigeon have previously submitted representations in response to the Babergh and Mid Suffolk Joint Local Plan Sustainability Appraisal Scoping Report in April 2020, in addition to the submission of representations to previous consultations of the emerging Local Plan in September 2019 and November 2017.
4. The role of an SA is to promote sustainable development by assessing the extent to which the emerging options (reasonable alternatives), when judged against sustainability objectives, will promote local environmental, economic and social development.
5. The SA process is an opportunity to consider if the proposals in the plan are the most appropriate given the reasonable alternatives. SA can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. It should be applied as an iterative process informing the development of the Local Plan to demonstrate that it complies with the National Planning Policy Framework (NPPF).
6. As part of the Babergh and Mid Suffolk Pre-Submission (Regulation 19) Local Plan Consultation, the SA is a critical evidence base document which should appraise all reasonable alternatives (spatial strategy options at this stage) against the SA framework to determine the sustainability implications of each reasonable alternative. This is then used to select, or guide the development of, the most sustainable spatial option.

1. A review of the assessment and selection of the Spatial Strategy

1.1 Chapter 5 of the SA presents the results of the assessment of the Spatial Strategies (SS) which have evolved following the receipt of feedback following the consultation in April 2020 of the revised SA scoping report and refreshed spatial strategies.

1.2 Pigeon submitted comprehensive representations to this consultation which can be summarised as:

- Recommended amendments to the SA assessment framework to recognise the rural nature of the district and the differences between employment and residential sites;
- Incorporation of a second stage assessment to recognise the provision of mitigation and enhancements to recognise that some site proposals will be able to incorporate measures that mitigate impacts and / or enhancement measures or other public benefits (such as provision of strategic infrastructure) that would ensure they can be made sustainable as per paragraph 103 of the NPPF. This is especially important in rural areas and will also ensure the SA is better aligned with other aspects of the Councils' evidence base and in particular it's Infrastructure Delivery Plan; and
- Consideration of an additional spatial strategy reasonable alternative which provides for additional residential supply in the villages which reflects the predominantly rural nature of the district.

1.3 Pigeon are pleased to note that some of the recommended changes to the SA site assessment framework were adopted by the Council although it was disappointing to see the spatial strategy suggestion not incorporated into the pre-submission version of the Plan as stated in paragraph 5.146 of the SA:

- *Some consultees suggested including an additional spatial strategy option that included focusing development at the hinterland villages and/or the hamlets in the Plan area. It has been decided not to include this as a separate new spatial strategy option because development at the hinterland villages and hamlets are covered by Spatial strategy option 4 (Proportionate Growth) and Spatial strategy option 5 (Hierarchical Growth).*

1.4 Notwithstanding the comments above, nine different spatial strategies have been assessed by the SA which are as follows:

- Option 1: Focusing on development at the Ipswich fringe
- Option 2: Focusing development at the Market Towns & Urban Areas
- Option 3: Focusing development at the Core Villages

- Option 4: Proportionate growth
- Option 5: Hierarchical growth
- Option 6: Focusing development along sustainable transport corridors
- Option 7: Focusing development at one or more new settlements
- Option 8: Focusing development at the main concentrations of employment
- Option 9: Focusing development in the least environmentally constrained areas

1.5 The SA presents the results of the assessment of these spatial strategies against the SA framework. Following a careful review of this assessment Pigeon have the following comments:

- Pigeon note that Option 1 (Ipswich Fringe) performs moderately well against the SA framework. Pigeon broadly supports this conclusion given that growth around the Ipswich fringe will provide residents and commuters access to a wide range of services and facilities and a strong public transport network. Furthermore there is a considerable degree of in-commuting into Ipswich and development around its fringe will, over time, reduce vehicle trips providing homes closer to employment opportunities.
- Within respect to Option 1 Pigeon believe there is scope to improve the sustainability performance of this option further. Locating future growth at the Ipswich Fringe will bring an array of sustainable benefits. As indicated in the SA, future schemes will be in close proximity to key services and facilities, enabling sustainable travel to amenities within and surrounding Ipswich. This too will enable economic growth; development naturally leads to an increase in local population – either residents or users – who support local facilities, retail and employment opportunities and spaces. As such, Pigeon feel that Option 1 should perform better against SA14: Economic Growth, and score a major positive effect (only) against this SA objective.
- Pigeon agree that Option 2 (Market Towns) performs strongly with respect to the SA objectives with significant positive benefits associated with SA1 (Health and Wellbeing), SA2 (Education), SA4 (Housing), SA6 (Air and Noise Pollution), SA9 (Climate Change Mitigation) and SA14 (Economic Growth). Many of these benefits are derived from locating development around the market towns which have access to a wide range of services and facilities which minimise the need to travel by car. Furthermore it is noted that three of the market towns have rail stations (including Sudbury) which provide commuters with the option of a highly sustainable mode of transportation.
- Pigeon also recognise the positive sustainability benefits of Option 3 (core villages). Given the rural nature of the district growth must also be directed to the core villages in order to provide much needed affordable homes and support the vitality of services and facilities and the village centre. Locating development around key transport corridors would enable this; Pigeon note and fully support

the recognition within the SA that some of the core villages such as Woolpit are close to market towns or strong employment centres. Pigeon has a site within Woolpit (Land north east of Heath Road) which we believe should be allocated on the basis of its sustainability credentials.

1.6 Paragraph 5.31-5.34 of the Babergh and Mid Suffolk SA presents the results of the assessment of the spatial strategy options. It concludes the following:

- *In overall terms, a spatial strategy that focuses development on the Market Towns and Urban Areas, also being the major employment locations, is likely to prove the most sustainable across the full range of SA Objectives. However, there are only five Market Towns in the two Districts and the part of the urban area of Ipswich that lies within the Babergh and Mid Suffolk Plan area is relatively small.*
- *It is recognised that it would be neither practical nor sustainable for all development to be located at the Market Towns and Urban Areas, given that these only comprise around a quarter of the 2018 housing stock in the Plan area, and that the scope for developing within the part of the Ipswich urban area lying within the Plan area is very limited.*
- *There will be local needs outside the Market Towns and Urban Areas that need to be provided for, and support for the jobs, services and facilities that they provide. There is therefore a good case in sustainability terms to allow for a reasonable proportion of development to be provided at the Core Villages and the Ipswich Fringe (which together account for around 40% of the 2018 housing stock), particularly in Sustainable Transport Corridors, all of which performed similarly across the SA Objectives taken as a whole. However, a large volume of dispersed development across the smaller settlements should be avoided.*

1.7 Pigeon broadly endorse and support the conclusions of the SA and the selection of a hybrid spatial strategy that supports Options 1 (Ipswich Fringe), 2 (Market Towns) and 3 (Core villages).

1.8 With respect to Option 2 however, Pigeon believe that the application of this strategy has resulted in a disproportionality lower growth in Sudbury when compared to the other market towns.

1.9 Appendix D of the SA contains the detailed assessment tables of the spatial strategy options. Pigeon have reviewed this information and note the following comments with respect to Sudbury:

- SA Objective 3 (reducing poverty) it is noted that Sudbury contains one of the highest areas of deprivation in the district
- SA Objective 12 (biodiversity and geo-diversity). The SA notes that areas around Sudbury are typically less environmentally constrained
- SA Objective 14 (economic growth) The SA notes that that there is a major employment part outside of Sudbury that can provide job opportunities beyond those available within the town itself.

- 1.10 Pigeon note from the comments above, that the SA regards Sudbury as one of the least environmentally constrained market towns in the district and with some of the highest indices of deprivation. Given the employment park outside of Sudbury and the ability to provide jobs within and immediately outside the market town, Pigeon believe this demonstrates Sudbury's ability to assume a greater level of housing than currently being planned for in the local plan.

2. SA Framework and Method of Approach

- 2.1 Section 6 and Appendix E of the SA present the methodology and results the assessment of all potential residential and employment allocations within the Local Plan.
- 2.2 In April 2020 Pigeon submitted representations to the revised SA Scoping report to which Pigeon made a number of recommendations to the site assessment criteria utilised by the SA to appraise the sustainability of the reasonable alternatives. Whilst Pigeon broadly supported the assessment, they do have a number of concerns that the assessment failed to recognise the rural nature of the district and that the distances to some of the key services and facilities were too low. This could result in sustainable sites being lost because of unreasonable expectations for distances to schools and bus stops.
- 2.3 Pigeon are pleased to see that the Council have incorporated some of their recommendations however it is critical that the Council continue to exercise planning judgement in the selection of sites particularly those that can mitigate or enhance their sustainability credentials via good design and the inclusion of key services and facilities.
- 2.4 As stated in these representations, Pigeon have a number of land interests in the district which are listed in Appendix 1 of these representations. A Delivery Statement has been prepared for each of these Sites utilising site specific information which is more detailed and accurate than the assessment used within the SA.
- 2.5 Given the above Pigeon believe that the Council must utilise the Delivery Statements and site specific information provided by Pigeon to assess the true sustainability of a site utilising mitigation.
- 2.6 Given the availability of site specific information, Pigeon have assessed the results of each of their sites within Table B and summarised their performance along with any information that is available to mitigate against any specific sustainability impact. This information is presented in Table 1 (below) although Pigeon note that many of their sites already perform strongly and therefore fully support their inclusion as sustainable options for a range of residential and employment schemes.
- 2.7 Pigeon have also included an assessment of these Sites that have not been included within the SA in order to demonstrate their strong sustainability performance to the Council. Pigeon would urge the Council to reconsider the assessment of these sites.

Appendix 1: Babergh and Mid Suffolk: Pigeon Sites

Site Ref	Site Name	Resi/ Employ ment/ Mixed Use Site	BMS Assessment Summary	Pigeon Commentary
SS0242/ LA042	Land at Tye Farm, Great Cornard	R	Site has good access to a range of services and facilities. This is a new residential allocation.	<p>The Delivery Statement indicates that the development at Land at Tye Farm will comprise land for a highly sustainable northern gateway Community Hub comprising a mix of complementary land uses including a pre-school, approximately 700 new homes, extensive areas of public open space, the retention and enhancement of green infrastructure and new recreational footpaths with links to existing Public Rights of Way. The Site is within easy walking and cycling distance of the services and facilities within Great Cornard. The settlement benefits from schools, shops, pubs, a medical centre, library and leisure centre. All are within walking and cycling distance of the Site. Further amenities are available in nearby Sudbury. Bus stops are available immediately west of the site, a railway station is less than a mile from the site. Inherently, the site is of little ecological value; the development has the potential to deliver a net gain in biodiversity. There are no designated heritage assets within the boundary of the Site, and there are none in close proximity.</p> <p>A site of this size is inherently sustainable; its size means there is more opportunity for mitigation and the integration of sustainable measures. Land at Tye Farm is thus a sustainable location for development.</p>
SS0223/ LA012	Land north of Burstall Lane and west of B1113, Sproughton	M	Site located within Ipswich Fringe well related to existing settlement with services and facilities located within walking distance (primary school and community shop). This is a new residential allocation.	<p>The site will provide for up to 105 new homes, open space, land for community use, an extension to village allotments and a new public right of way, and currently has resolution to grant planning permission subject to the S106 agreement. The site is already in close proximity to an array of services and facilities, located just 400m from the village centre of Sproughton and is near to other key amenities including employment areas, community shops, sports clubs and education facilities. The site is within easy access to bus stops on Loraine Way and Lower Street, approximately 250m from the centre of the site which provides regular services to the centre of Ipswich.</p>

				<p>The Delivery Statement indicates that there are no environmental or technical matters that would restrict delivery of the site. The scheme includes proposed mitigation and enhancement measures to reduce recreational pressure to SPAs (located within 2km of the site), which includes connecting with onsite public open space and connecting to nearby Public Rights of Way. Enhancements within the development will deliver a net gain in biodiversity, and the Heritage Impact Assessment states that the scheme will have minimal impact upon the setting of the nearest heritage assets.</p> <p>With excellent access to services and facilities and no constraints, Land north of Burstall Lane and west of B1113 should be identified as a highly sustainable location for a new, mixed-use development.</p>
SS0099/ LA047	Land north-east of Turkey Hall Lane, Bacton	R	Site granted planning permission.	<p>The site at Land north-east of Turkey Hall Lane has an extant outline planning permission for up to 51 new homes. Bacton is a short distance from Stowmarket where a range of higher order services and facilities can be found, as well as easy access to the A14 corridor. The village benefits from good bus links to Stowmarket, Eye & Diss and other locations with rail connections from Stowmarket to London, Ipswich and Cambridge. Bacton itself benefits from a good range of services and facilities within walking and cycling distance from the site. The site is not located within or adjacent to a Conservation Area, and its proximity to the Grade II listed Turkey Hall was established as not harming the setting of the building. The Preliminary Ecological Appraisal was undertaken; new landscaping and SuDS features provide opportunities for on-site mitigation and enhancement with potential to achieve net biodiversity gain.</p> <p>The site at Land north-east of Turkey Hall Lane has been recognised for its suitability for development, and has been granted outline planning permission. The site is a sustainable location for development.</p>
SS0551/ LA001	Land east of Norwich Road, Barham	M	Site located within the Ipswich Fringe, with some services and facilities located within walking distance. Adjoining allocation includes land reserved for a primary school. This is a new residential allocation.	<p>The Delivery Statement accompanying the site indicates that the site includes provision for a pre-school and 2FE primary school, a site for a community hub, green infrastructure, approximately 595 new homes and Public Rights of Way improvements. The provision of several services and facilities on-site (particularly the schools) will help to reduce the need for private car and all will be accessible by sustainable and active modes of transport provided for within the scheme. Current provision includes bus stops no more than 150m from the centre of the site. As</p>

SS0076/ LA002	Land north of Church Lane, Barham		Site located within the Ipswich Fringe, with some services and facilities located within walking distance. Allocation includes land reserved for a primary school. This is a new residential allocation.	<p>recognised by Babergh and Mid Suffolk District Council, the site is within walking and cycling distance of services and facilities within Claydon, within the Ipswich Fringe, making it a highly sustainable location for development.</p> <p>There are no known constraints to the scheme, and delivery would provide housing, education and community uses for the local residents. Enhancements within the development will deliver a net gain in biodiversity and improve PRoWs, and provide informal recreation space and green public open spaces.</p> <p>The evidence presented in the Delivery Statement indicates that the site should be identified as a highly sustainable location for a new, mixed-use development.</p>
SS0811	Land to the north of Springlands Way (A134)	M	The site is constrained in relation to water quality and resources, proximity to an AQMA, soil resources, biodiversity assets, landscape sensitivity and proximity to services including town and district centres and a railway station. The site is recognised as performing well in relation to settlement hierarchy, transport links, economic growth and supporting a shift towards the use of bus and cycle.	<p>The Delivery Statement demonstrates that there are no constraints to the delivery of Land to the north of Springlands Way. The site will deliver employment land, retail and leisure uses, new homes, relocation of the Town Wide Waste Recycling Centre, public open space and green infrastructure linking into the countryside.</p> <p>The site is in a highly accessible location, where opportunities for walking and cycling can be maximised. Notwithstanding the excellent range of services and facilities in Sudbury, the scheme will provide new and improved local services. This will benefit the town as a whole and increase its sustainability.</p> <p>There are no landscape designations within the vicinity of the site, and no visual relationship is envisaged between the site and the AONB 7.5km to the southwest of the site. Additionally there are four statutory biodiversity sites within 5km of the site boundary. Given the distance between the site and the SSSIs and the lack of connectivity between the two, it is considered unlikely that the development proposals will impact the SSSIs. The main parts of the site are of limited ecological value. The main features of the site will be retained and enhanced as far as possible, and has the potential to deliver a net gain in biodiversity. The site is in proximity to designated heritage assets. As such, a range of design and landscaping features can be incorporated to support and where possible, enhance the setting of these assets.</p> <p>Over half of the Site is allocated within the Babergh Core Strategy (2014) as Chilton Woods, thereby demonstrating that the Site is in a sustainable location that is appropriate for a mixed-use scheme which delivers the repositioned Waste Recycling Centre, which is identified in the Councils' Infrastructure Delivery Plan.</p>

				Giving consideration to the evidence from the Delivery Statement above, the site can therefore be identified as a sustainable location for development.
SS1168	Land west of the A137, Wherstead/ Land at Garage Field, Wherstead	E	<p>Site granted planning permission.</p> <p>The site is constrained in relation to water quality and resources, proximity to an AQMA, soil resources, biodiversity assets, landscape sensitivity and proximity to services including town and district centres and a railway station. The site is recognised as performing well in relation to settlement hierarchy, transport links, economic growth and supporting a shift towards the use of bus and cycle.</p>	<p>The land west of the A137 site has planning approval and will deliver highway improvements to the A14 junction in that location. The Delivery Statement accompanying the site details that the site was found to be of low ecological value with limited conservation potential. No protected sites are in proximity to the site, and therefore will have no impact on designated sites within the District. Landscape planting will help to enhance the site biodiversity overall. No listed buildings will affect or be affected by the site.</p> <p>The site benefits from already being in close proximity to existing bus services which connect the site to Ipswich, Tattingstone, Capel St Mary, Colchester East Bergholt, Hadleigh, Whitehouse, Holbrook Bourne Bridge and Martlesham. A number of local infrastructure improvements are due to be delivered, which will encourage walking and cycling between nearby residential estates and the site.</p> <p>The site at Garage Field has been recognised for its suitability for development, and has a pending planning application. The site is a sustainable location for development.</p>
SS1027	Walled Garden, Wherstead	M	<p>The site is constrained in relation to water quality and resources, proximity to an AQMA, soil resources, biodiversity assets, landscape sensitivity and proximity to services including town and district centres and a railway station. The site is recognised as performing well in relation to settlement hierarchy, transport links, economic growth and supporting a shift towards the use of bus and cycle.</p>	<p>The site is in a sustainable location, located just 3.5km from services and facilities within Ipswich, and benefits from transport links into Ipswich and the wider area. The site itself is mixed-use and will provide Class E employment space alongside community uses and approximately 5 new residential dwellings. The Delivery Statement demonstrates that the site is free from any environmental constraints and benefits from good cycling and walking connectivity.</p> <p>A sensitively designed landscape scheme will help to mitigate views into the site through tree and hedge planting along the north and western boundary. The development will retain its habitats of value, with appropriate mitigation, and more widely offers the opportunity to provide biodiversity enhancement through further provision of native hedgerow and tree planting. There are a number of listed buildings within the vicinity of the site. Existing landscape features will be incorporated into the design, and public open space will be integrated into the overall layout.</p>

				<p>Giving consideration to the evidence from the Delivery Statement above, the site can therefore be identified as a sustainable location for development.</p>
	Suffolk Leisure Park, Wherstead	R		<p>The development at Suffolk Leisure Park will see the provision of around 50 new homes, extensive areas of public open space and the retention and enhancement of green infrastructure throughout the scheme. The site is not subject to any environmental designations, and there are none located adjacent to the site. The site is within the Ipswich Fringe and thus benefits from the nearby extensive offering of services and facilities. Ipswich railway station is approximately two miles north of the site, providing onward connections to Felixstowe, Stowmarket, Bury St Edmunds, Colchester, Norwich, Cambridge and London. Inherently, the site is of little ecological value; the development has the potential to deliver a net gain in biodiversity.</p> <p>The site can therefore be considered a sustainable location for development.</p>
	Stevens, Wherstead	E		<p>Land at Stevens comprises brownfield land to the west of The Strand. The site was selected by Babergh District Council for the preparation of a Local Development Order (LDO) to encourage businesses, especially those related to food production, to develop in the Enterprise Zone without the need to secure planning permission, if the proposals complied with the conditions of the Order. The site will be brought forward to deliver a high quality employment scheme comprising Class B2/B8 and Class E employment provision.</p> <p>The site benefits from being in proximity to two bus stops, both within 300m, providing connections to Ipswich and Manningtree every 30 minutes. The development will include sustainable drainage systems and the proposals include opportunities for significant additional planting of native and new specimen tree and hedge planting, creating new opportunities for biodiversity. In this respect, the site can be identified as a sustainable location for development.</p>
SS0823	Land north-east of Heath Road, Woolpit	M	The site is not assessed in the SA.	<p>Woolpit plays an important role as local service centre for the surrounding rural area and its hamlets. It has a good range of shops, services and employment opportunities. Additionally, it is in close proximity to Bury St Edmunds, a major employment centre, with regular bus services running between the two locations.</p> <p>Land north-east of Heath Road lies between residential properties and Woolpit Primary; it is well-connected to its surroundings and local services as highlighted in the Facilities and Services Plan within the Delivery Statement. It</p>

				<p>has a pending planning application and the site will provide land for the future expansion of Woolpit Primary alongside new homes, a cycle and pedestrian link and new recreational footpaths, which support a sustainable development. There are several nearby bus stops and the nearest railway station, Elmswell, is less than 3km from the site. The site is not within 1km of any statutory or non-wildlife designations and has no ecological or heritage constraints.</p> <p>The site can therefore be identified as a sustainable location for development.</p>
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Turley Office
8 Quay Court
Colliers Lane
Stow-cum-Quay
Cambridge
CB25 9AU

T 01223 810990

Turley