

## Home Builders Federation

### Matter 7

#### BABERGH AND MID SUFFOLK LOCAL PLAN EXAMINATION

##### **Matter 7 – Environment Policies**

*(Policies SP09, SP10, LP17, LP18, LP19, LP20, LP21, LP22, LP23, LP24, LP25, LP26, LP27, LP28, LP29)*

7.1 a) Is policy SP09 based on robust and up to date evidence? b) Is it sufficiently clear, including in relation to where the Suffolk Coast RAMS applies? c) Will it be effective?

No comment

7.2 Are the requirements of policy SP10 sufficiently clear including with regard to what is required from developers and will the policy be effective?

No comment

7.3 a) Is policy LP17 consistent with national policy and other parts of the plan? b) Are the requirements of the policy clear? c) Would the policy be effective including in relation to the use of brownfield v greenfield land, light pollution and air quality? d) is there robust evidence to justify the policy?

No comment

7.4 a) Is policy LP18 consistent with national policy? b) Are the requirements of the policy clear? In particular is there sufficient clarity regarding County Wildlife Sites, environmental corridors and how off-setting would work? c) Would the policy be effective? d) Is the policy based on robust evidence that justifies its requirements particularly in relation to i. the minimum 10% increase for biodiversity ii. wildlife corridors? e) Is it sufficiently clear how the net gains for biodiversity would be measured?

The Council are proposing to require a minimum net gain in biodiversity of 10%. The HBF recognises that should the Environment Bill become an Act then all development will be required to achieve this level of biodiversity net gain, however until this legislation is enacted the 2012 NPPF states at paragraph 109 that the planning system



should seek to achieve net gain where possible. Whilst we understand the Council's desire to adopt the proposed level of net gain in the Environment Bill it must be remembered that this Bill includes provisions to allow a transitional period with regard to the application of the proposed net gain requirements. As such requiring a 10% from the adoption of this local plan may not be consistent with any transition arrangements. In addition, a policy requiring development to achieve a net gain but without specifying a percentage would not prevent the Council from implementing any future legislation regarding net gain but would ensure flexibility depending on how and when the proposed 10% national requirement is implemented by Government.

7.5 a) Is policy LP19 clear and would it be effective? b) To be sound does the policy need to refer to local landscape designations in neighbourhood plans, and retain existing Visually Important Open Spaces and Special Landscape Area designations?

No comment

7.6 a) Is policy LP20 consistent with national policy? b) Are the requirements of the policy clear, and would they be effective? c) To be found sound does the policy:  
i. needs to identify how development in the project areas and in the setting of the AONB will be assessed?

ii. Refer to the need to conserve quality views and the distinctiveness of the AONB and to AONB management plans?

iii. Refer to potential future extensions to the AONB?

iv. Require that proposals are accompanied by a Landscape and Visual Impact Assessment?

No comment

7.7 a) Is policy LP21 consistent with national policy? b) Is the policy clear and would it be effective? In particular to be found sound does the policy need to specifically mention Conservation Areas and/ or that it covers both designated and non-designated heritage assets?

No comment

7.8 Is policy LP22 consistent with national policy particularly with regard to highway matters? Is the proposal to remove PD rights justified?

No comment

7.9 Is the approach in policy LP23 justified?

No comment

7.10 a) Are the requirements of policy LP24 clear, including with regard to what proposals are covered by the policy? b) Would the policy be effective? c) Is the policy consistent with national policy particularly with regard to highway matters?

No comment

7.11 a) Are the criteria in policy LP25 justified and consistent with national policy? In particular is there robust evidence to justify the targets within the policy and do they take into account viability? b) Are the requirements of the policy clearly articulated and would the policy be effective?

As set out in our representations we would suggest part 5 is removed from the policy and set out in the supporting text to avoid any confusion with the required technical standard.

7.12 Are the requirements of policy LP26 justified and clearly articulated, and would the policy be effective? In particular:

a) is the requirement to meet Space Standards in the Technical Housing Standards based on robust evidence?

The Council set out in paragraph 62 and 63 their justification for implementing the National Described Space Standards. Whilst we recognise the requirement for homes delivered through the GPDO are now required to meet minimum space standards this does not remove the requirement, as set out in footnote 46 to paragraph 127 of the NPPF, that the adoption of these optional technical standards should be based on evidence that they are needed. Without any evidence of need the Council cannot justify the requirement for space standards to be met.

b) does the policy need to encourage the use of design codes and use of the Design Review Panel?

No comment

c) is 1f consistent with LP06?

Part 1f is ambiguous and unnecessary as it is already considered in LP06 which sets out the Council's requirements for such homes. We would suggest 1f is deleted.

d) is it sufficiently clear as to when part 2k will be applied?

No comment

7.13 Are the requirements of policy LP27 justified, and would it be effective?

No comment

7.14 Are the requirements of policy LP28 clear and justified?

No comment

7.15 Are the requirements of policy LP29 clear and justified?

No comment

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