

## **Stoke by Nayland Parish Council: Representations regarding the implications of the revocation of the East of England Regional Strategy on the Babergh Core Strategy**

We attach extracts from the Babergh Core Strategy containing the material references to the East of England Regional Strategy (RSS).

These references are pervasive. More than that, the extracts below show that the RSS is treated as criterial, that is, it is an aim that the BDC LDF conforms to it:

*The Submission Draft Core Strategy is considered to be in general conformity with [the RSS] (page i)*

*The level of new homes to plan for is in line with that of the regional Plan (page iii)*

*. . . the Council has had regard to the adopted RSS and it is considered that the draft Core Strategy is in general conformity with it (page 2)*

*The adopted RSS set targets for new homes and jobs for each council area, and . . . remains an important consideration (page 21)*

*. . . the proposed indicative jobs growth target figure of the emerging RSS . . . is considered to be founded on reliable evidence and that that evidence remains a material factor . . . (page 23)*

*One [other approach] considered compensating for a predicted shortfall in meeting the adopted RSS target . . . Another calculation . . . applied the same percentage growth to the jobs target for the district to 2031 as had been used in the adopted RSS for the growth in new houses (page 23)*

*A good indicator of success was . . . recognition and identification of the HG sub-region within the adopted RSS . . . In response, the overall sub-region has demonstrated a track record of delivering housing growth at or above RSS required levels. The same does not apply to jobs growth, which is recognised as problematic and in need of redress. However, overall, these considerations are deemed to provide justification and support for Babergh's jobs-led approach (and economic growth ambitions) and our jobs-housing growth balance (page 28)*

The LDF acknowledges that the RSS was to be revoked. It seeks to justify using it as criterial by contending that eg “RSS . . . is considered to be founded on reliable evidence and that that evidence remains a material factor . . .” (page 23).

But this is fallacious. The RSS was a vehicle for taking central government targets for growth, and allocating them to District Council areas (and certain other geographical areas such as the Ipswich Policy Area). It is arguable that the process for allocating these targets was evidence-based and not requiring reconsideration. But even if that was conceded (and we do not concede it), the resulting numerical targets for Districts depend entirely on the central government targets for the Region. It is not just a matter that when the input changes, so must the output: it is a matter that the input has been removed, so the whole rationale for the process disappears.

Clearly, it becomes necessary for BDC “to consider growth needs from the “bottom up””, as indeed the LDF says at 2.2.1. But the LDF does not do this. In the immediately following section, it reverts to speaking of “the amount of growth planned for Babergh”. The only justification we can find for the numerical targets in the LDF is the RSS.

We submit that the revocation of the RSS has radical implications for the LDF. It removes the basis for the numerical targets for growth, on which the LDF is founded. Logically, it requires BDC to go back to the start, and do what the LDF acknowledges requires to be done, namely “to consider growth needs from the “bottom up””.

***Material references to Regional Spatial Strategy/East of England Plan in Babergh District Council LDF Core Strategy:***

*Page i*

*Page iii*

*1.1, Page 1*

*Page 2*

1.3 Summary of Position on the Regional Spatial Strategy (RSS) (The East of England Plan, adopted 2008)

*2.1.1, Page 16*

*Pages 21, 22*

2.2.1 Background and Context for Growth in Babergh

*Page 23*

2.3 Level of Economic Growth

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2.5 Relationship of Jobs Growth to Housing Growth

*Pages 26, 27*

2.6.2 The four Ipswich Policy Area (IPA) Local Authorities (including Suffolk County Council) / Suffolk Haven Gateway

*2.6.4, Page 28*

*3.3.11, Page 54*

*(Stoke by Nayland Parish Council has submitted the relevant text to the above sections in a separate appendix document)*

**January 21\* 2013**

## **[Appendix]**

### **Stoke by Nayland Parish Council:**

#### ***Material references to Regional Spatial Strategy/East of England Plan in Babergh District Council LDF Core Strategy***

##### ***Page i***

For future growth the focus moves away from “targets” and “prescribed numbers” and instead is driven by ensuring provision is made for the right kinds of jobs and homes, in the right place at the right time. The proposed approach was informed by a public exercise in 2010 to review the approach towards growth for Babergh. At the same time, the Regional Plan – the East of England Plan (adopted in 2008) remains in place (until such time as this is abolished by the Government) and there is accordingly a need for Babergh’s new Plan to be in general conformity with this document. The Submission Draft Core Strategy is considered to be in general conformity with both this and the emerging National Planning Policy Framework

##### ***Page iii***

The level of new homes to plan for is in line with that of the regional Plan (or RSS: at approximately 300 per year, which is just above the 280 annual RSS figure and will compensate for some previous under-provision since 2001). The net effect is a need to find and allocate enough new sites to provide for 2,500 new homes over the Plan period to 2031. It is considered that this number of homes is evidence based and conforms with the regional Plan.

##### ***1.1, Page 1***

One of the key changes which has influenced the approach taken in our Core Strategy relates to the way in which the level of growth is determined. In the past the level of growth for jobs and housing has been determined by targets, set at a regional level. The new agenda allows for a more local approach to be applied to establishing the appropriate level of growth for the area, which could be described as a “bottom-up” approach. This is reflected in this draft of the Core Strategy, as local evidence, indicating need, trends and aspirations has been used to inform the growth levels for jobs and homes in Babergh for the next 20 years.

##### ***Page 2***

#### **1.3 Summary of Position on the Regional Spatial Strategy (RSS) (The East of England Plan, adopted 2008)**

In preparing this Core Strategy, the Council has had regard to the adopted RSS and it is considered that the draft Core Strategy is in general conformity with it. This is notwithstanding the likelihood that the East of England Plan will be revoked relatively soon, as all RSSs are expected to be abolished through the above-mentioned ‘Localism’ Bill. Acknowledging the evolving changes proposed to the planning system, this Core Strategy has been prepared with a strong emphasis on the need to reflect local circumstances, needs and preferences as key guiding considerations, along with the other extensive bodies of evidence that we have gathered, interpreted and applied as relevant to, and suitable for, the locally distinctive circumstances of Babergh. In a similar vein, the evidence used to inform both the adopted RSS and the emerging RSS (review to 2031) is accepted overall and remains both relevant and applicable to the formulation of this new Plan document.

Please note that further information on this matter will be included in the supporting technical background document dealing with ‘Conformity’.

##### ***2.1.1, Page 16***

The 2001 Suffolk Structure Plan and 2008 Regional Spatial Strategy (the East of England Plan) both contained policies for identifying settlement hierarchies. This was based on criteria linked to the size of settlements and the number of key services within them. In 2011 in Babergh district we have found that the context has changed since the 2001 Suffolk Structure Plan settlement

hierarchy policy was developed. Some villages may have lost their convenience goods shop (and/or post office) and/or their pub. We also considered the more recent, emerging Regional Spatial Strategy, and felt that this set too high a benchmark for key service centres in this part of rural Suffolk, for example employment opportunities in villages in Babergh district are limited, and most have only one or two shops and services rather than a range, and public transport to higher order settlements can scarcely be described as “frequent”. As well as this, feedback from the “Growth Issues and Scenarios” consultation has informed the approach to a hierarchy of settlements in the rural areas and the ‘key service centre’ concept (which itself is not new). We have therefore taken a fresh look at this and have sought the views of town and parish councils to establish how Babergh’s settlement pattern actually works on the ground.

*Pages 21, 22*

### **2.2.1 Background and Context for Growth in Babergh**

Growth and further development within the district is a “given” requirement for the future. Key issues to address are the scale of this growth and where it should be located. This applies equally to housing and economic growth, both of which need to be balanced to ensure growth is sustainable. It is also essential to ensure infrastructure is provided and maintained at a level adequate for the level of growth.

Guidance is provided to steer our strategy for growth for the district through national planning policy guidance. The adopted RSS set targets for new homes and jobs for each council area, and whilst the regional strategic level of policy is likely to be revoked the sub-regional context for Babergh remains an important consideration. Babergh works with its neighbours in the Haven Gateway area across the county boundaries of Essex and Suffolk, and with neighbouring authorities in the Ipswich Policy Area.

The Government announcement regarding proposed abolition of the RSS, the East of England Plan, provided the Council with an opportunity to consider growth needs from the “bottom up”, and consider the existing pattern of development, past rates and amount of growth, Local Plan allocations that have not yet been developed and outstanding planning permissions, the capacity of settlements to accommodate growth, and local needs and aspirations.

*Page 23*

### **2.3 Level of Economic Growth**

The adopted RSS (2008) set out in Policy E1 an indicative job growth target of 30,000 jobs for the Suffolk Haven Gateway (defined as Ipswich, Suffolk Coastal and Babergh). This was not apportioned between the districts, so it was for these local authorities to determine an appropriate distribution between them. Whilst having regard to job creation plans and aspirations for our neighbour authorities, we also consider that circumstances have moved on since then. The targets for new jobs set out on a district by district basis in the draft review of the RSS (to 2031) are a little different in nature from the RSS housing growth targets. The indicative jobs target figures in particular were developed by councils working together with neighbours – in this area the Suffolk Haven Gateway authorities – to provide a “bottom up” estimate based on need / capacity and the local economic context. Accordingly, and whilst the Government has indicated that RSSs will be revoked, it is important to note that the proposed indicative jobs growth target figure of the emerging RSS (9,700 for Babergh with an apportionment for the Ipswich Policy Area to be determined by the IPA authorities) is considered to be founded on reliable evidence and that that evidence remains a material factor in determining an appropriate indicative jobs target figure for Babergh.

Assessing a realistic jobs growth target has also been considered from other approaches. One of these considered compensating for a predicted shortfall in meeting the adopted RSS target of 30,000. This used the forecast figure for Babergh of 8,100 jobs and added one-third of the residual Suffolk Haven Gateway target figure (i.e. one third of 7,140, assuming a three-way split between Babergh, Ipswich and Suffolk Coastal). This gives a figure of 10,480 new jobs. However, it was felt that this was overly optimistic, particularly given the loss of public sector jobs,

and was only based on projecting target figures forward. Another calculation based on the forecast figure of 8,100 applied the same percentage growth to the jobs target for the district to 2031 as had been used in the adopted RSS for the growth in new houses, i.e. 20%. This gave a figure of 9,720 new jobs.

In terms of assessing a jobs growth target for Babergh's Core Strategy the locally derived indicative figure of approximately 9,700 is felt to be appropriate.

#### ***Page 25***

### **2.5 Relationship of Jobs Growth to Housing Growth**

The basis for arriving at Babergh's respective figures has been set out in summary form in preceding text. Both employ and balance a range of evidence and considerations. Some of that evidence came from that used to inform the emerging RSS review (to 2031) and some from more local sources (such as the recent Suffolk Haven Gateway Employment Land Review (ELR) study). These sources were not mutually exclusive. We have also listened to the views of consultees during the recent Growth review (and Scenarios) exercise and this forms part of the overall evidence base

#### ***Pages 26, 27***

### **2.6.2 The four Ipswich Policy Area (IPA) Local Authorities (including Suffolk County Council) / Suffolk Haven Gateway**

The IPA as an explicit entity was identified and formalised long ago in various versions of the Suffolk Structure Plan (including the most recent Plan adopted in 2001). This included a planned and co-ordinated approach to housing provision in recognition that the borough boundary is tightly defined and that housing provision in the IPA, outside the borough itself, effectively serves and relates closely to the borough. The Babergh Local Plan, alteration No.2 2006 was prepared in the context of the Suffolk Structure Plan and implemented its strategy (including the strategic approach to housing in the IPA), planning policies and proposals at a local level. The IPA approach was also identified and continued in the adopted RSS of 2008, again requiring co-ordinated housing provision and in addition, co-ordinated new jobs provision. The above-mentioned groupings from each constituent local authority and Haven Gateway Partnership led groupings have been used for co-ordination of growth targets and delivery.

#### ***2.6.4, Page 28***

A good indicator of success was the achievement of New Growth Point status for the sub-region, leveraging in central government funds that have now mostly been invested. Another was recognition and identification of the HG sub-region within the adopted RSS (together with its own suite of area-specific policies). In response, the overall sub-region has demonstrated a track record of delivering housing growth at or above RSS required levels. The same does not apply to jobs growth, which is recognised as problematic and in need of redress. However, overall, these considerations are deemed to provide justification and support for Babergh's jobs-led approach (and economic growth ambitions) and our jobs-housing growth balance.

#### ***3.3.11, Page 54***

Whilst having regard to the national and the extant RSS brownfield land re-use target of 60%, Babergh's circumstances, evidence and priorities suggest that 45% would be a locally appropriate brownfield land re-use target. This would be in line with the target level that has been used as a local Babergh performance indicator.