

## Babergh Development Framework

### **Core Strategy (2011- 2031) Submission Draft**

(Part 1 of Babergh's New Local Plan)

#### **Technical Background Document 2: Spatial Strategy – Version 1.1 (10 October 2011)**

##### **1. Introduction**

1.1. This Technical Background Document supports the Core Strategy (2011 – 2031) Submission Draft - Part 1 of Babergh's Local Plan. The Spatial Strategy underpins the Core Strategy setting out a broad framework for where future growth should go and the future shape of the local communities around the district. From the spatial strategy, core policies flow, together with more detailed guidance much of which will be provided in subsequent Development Plan Documents. This paper provides further detail on;

- An explanation of the Settlement Pattern Policy and the distribution of growth
- Explanation of the Broad Locations
- Explanation of the approach to growth in rural areas.
- Explanation of the context for Infrastructure, delivery and Monitoring.

##### **2. Explanation of the settlement pattern policy and the distribution of growth**

###### **2.1 Settlement Pattern Policy CS1**

2.1.1 The Submission Draft policy CS1 sets out the hierarchy of settlements which is reflected in the overall development strategy.

2.1.2 A hierarchical approach to planning for jobs and homes is not a new concept. It has long been established that large urban areas and towns which typically are host to employment opportunities, shops, schools, health facilities and good transport opportunities or links, are the most sustainable locations for most people to live and work. This is based on the idea that the more people that are located close to everyday needs and a range of employment opportunities the less people need to travel.

2.1.3 This established “sustainable” approach to development has led to many years of growth being focused around the towns and urban areas. In a rural district like Babergh, the traditional hierarchy is relevant, but not in isolation. 76 parishes dispersed over 230sq miles, requires a more local adaptation of the generic ('One size fits all') hierarchical approach.

##### **3. Adopted Babergh Local Plan 2006**

3.1 The local hierarchy in the past has been based on the following;

- Towns / Urban areas
- Sustainable Villages
- Non-Sustainable Villages
- Countryside

- 3.2 The development strategy in the Adopted Babergh Local Plan (2006) has concentrated most growth in Sudbury and Great Cornard, (75%) and Hadleigh (10%) with the Ipswich Fringe having a more restrictive stance towards additional development. (15% together with the rural areas). The Sustainable villages as defined in the Local Plan are the larger villages with the benefit of a number of key services, also targeted for some growth at varying levels, but not significant. The non-sustainable villages providing for very small scale growth, primarily that identified for a local need or exceptional development. Beyond the defined villages development is limited to that which is essential in the countryside.

#### 4. Issues and Options Draft Core Strategy (May 2009)

- 4.1 The Issues and Options document was based on the need to accommodate housing land to meet the RSS target of 5600 new homes. Based on this, 5 options for the district's spatial strategy were suggested.

##### Option 1: Business as Usual

This would mean similar proportions of growth being directed to locations as in the Adopted Local Plan;

- Sudbury / Great Cornard - 75%
- Hadleigh - 10%
- Ipswich Fringe and the rural areas - key service centres (sustainable villages) 15% with the bulk of this going to the Ipswich Fringe
- Non-sustainable villages and countryside - very restrictive approach to development, infilling, redevelopment and exceptions.

##### Option 2: Maximum Urban Concentration

This would focus almost all the required development in the urban areas, based entirely on the sustainability principles. Sudbury/ Great Cornard, Hadleigh and the Ipswich Fringe would share the growth, with the rural areas, including the key service centre seeing minimal growth and change

- Sudbury / Great Cornard- highest proportion of growth (but less than option 1)
- Hadleigh - higher proportion of growth than Local Plan has provided (1/3 of development at Sudbury / Great Cornard)
- Ipswich Fringe 1/3 of development for Babergh, significantly exceeding the target for this area in the RSS. This would accelerate the growth in the Ipswich Fringe by 50%.
- Key Service Centres - very limited level of growth representing a slower growth rate than provided for in the Local Plan.

##### Option 3: Equitable Dispersion

This avoids concentration of development in any one single location, but instead provides growth throughout the district.

- Sudbury / Great Cornard - The largest share of development, but significantly less than options 1 or 2. It would represent a lower growth rate than previously provided by the Local Plan. (50%).
- Hadleigh - growth requirements are double that of option 1
- Ipswich Fringe - Double the level of growth than that provided under option 1
- Key service Centres - significantly more overall than in option 1, but based on this element to be spread widely over the district to many settlements to compliment the dispersed ethos.
- Other smaller villages and countryside- restrictive approach limited to, infilling, redevelopment and exceptions.

## Option 4: Rural Development

This option allows for a greater contribution to be made by the larger villages to meeting the housing targets, thus allowing for a reduced reliance on the market towns and Ipswich Fringe.

- Sudbury / Great Cornard - largest single proportion of all locations, but less than other options and lower growth rate than provided by the Local Plan.
- Hadleigh - growth higher than in the Local Plan, but will allow for its current role to be maintained.
- Ipswich Fringe - provides for the level of growth expected for this area in the RSS.
- Key Service Centres - collectively make a significant contribution to housing growth. Many sites for extension to villages would need to be made to accommodate growth. Widely dispersed, so not too significant in any one location

## Option 5: New Settlement

A new settlement to accommodate up to 1500 dwellings and further growth in later plans, allows for a smaller level of growth in other locations.

- Sudbury / Great Cornard - overall lower growth than provided by the local plan, particularly in the latter part of the CS plan period.
- Hadleigh - lower level of growth to recent years and the Local Plan provision
- Ipswich Fringe - this would allow for  $\frac{3}{4}$  of required amount of development allowed for in this area in the RSS.
- Key Service Centres - this would be significantly lower rate of growth than the Local Plan provides with half as much provision in these areas than tha provided by the Local Plan allocations in these areas.
- Other smaller villages and countryside- restrictive approach limited to , infilling, redevelopment and exceptions.

## 5. Consideration of options / consultation and why preferred options selected.

### 5.1 Preferred Options May 2010 (Unpublished)

**Note:** The Preferred Options Document was not published for Consultation, due to the Coalition Government's announcement to revoke RSS and urging authorities to set local targets with their communities. Instead of proceeding with this stage of consultation, a review of growth and the Babergh approach was undertaken and supported by an alternative document, The Future Growth of Babergh District to 2031, which was prepared and consulted on in the autumn of 2010, (agreed at Babergh District - Council Meeting 1<sup>st</sup> June 2010).

- 5.2 The Preferred Options document suggested a hierarchy and distribution strategy based on RSS targets indicating 2 scenarios, one at the level indicated in the Adopted RSS and a higher level as per the *draft review of the RSS*.
- 5.3 The preferred development strategy for Babergh outlined in the Preferred Options was to distribute development to the towns and urban areas and the key service centres. The settlement hierarchy upon which this approach is based is set out below, together with the criteria used to define this.
- 5.4 The consultation on the Issues and Options report indicated minimal support for a new settlement (option 5) and equitable dispersion (option 3). Option 2, urban concentration had just under 40% stating this as a first preference, with rural development (option 4) reaching nearly 50% as a first preference. The business as usual (option 1) had just 30%

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indicating this as a first preference, but this rises to almost 60% when second preferences are included. This mixed response is reflected in the preferred option which combines elements of the options, most notably, options 1 and 4.

- 5.5 Option 5, a new settlement was dismissed, for a number of reasons. It received the least support in the responses to the Issues and Options consultation, with only 10% indicating this to be a first or second preference. It is the option with most negative sustainability effects and would fail to address local needs associated with housing, employment and retail development through a district wide approach. There would also be a very long lead time before any new development could be delivered through this approach. Furthermore, the level of growth is unlikely to be sufficient to sustain a new settlement.
- 5.6 The preferred option does not directly correspond with the remaining four options. However, it combines elements of option 1 and option 4 in as much as it reduces the proportion of development proposed for Sudbury and Great Cornard from that indicated in option 1, and suggests development in the Ipswich Fringe, Hadleigh and the KSCs, closer to the proportions suggested in option 4 (although the latter is 8% lower).
- 5.7 Option 2 does not allow for any growth in the KSCs, which has a number of disadvantages, including not addressing housing and employment needs in many parts of the district and reducing the ability of larger villages to sustain the current level of service provision. In addition, the level of growth in the Ipswich Fringe is significantly higher than alternatives, accelerating the level of growth planned in this area by 50%.
- 5.8 Option 3, disperses development more equally, thus reducing the amount of development proposed in Sudbury and Great Cornard. However, this area has the greatest need, particularly for affordable housing, which may not be met if a lower level of development were to be provided. Option 3 increases the level of development in Hadleigh to significantly above its planned growth. Responses to the consultation on the Issues and Options indicated that less than 5% considered this as a first preference (the lowest first preference for all options).
- 5.9 The preferred option for overall distribution of development is for it to be shared between the town centres / urban areas and the Key Service Centres. The proportion of this distribution reflects the opportunities and constraints which apply to each location, the responses, and the Sustainability Appraisal. This option also reflects early indications from the Stage 1 Habitats Regulations Assessment process that care should be taken in terms of the percentage of growth allocated for the Ipswich Fringe. Work undertaken strongly indicates that the higher the level of growth at the Ipswich Fringe the more likely it will be to have adverse impacts on the Stour and Orwell Estuary SPA since the Ipswich Fringe is located in fairly close proximity to the Stour and Orwell Estuary. In addition the [River] Deben SPA may also be affected by higher levels of growth at the Ipswich Fringe.
- 5.10 It was suggested that Babergh could usefully be divided into three broad and relatively distinct areas: western, mid and eastern Babergh. The existing settlement pattern, population distribution, divisions within the housing market areas and pattern of employment / commercial market areas (plus distribution of employment sites) suggest this typology, as is evident below, and it is upon this that the future development strategy was proposed to be broadly based.

The overall hierarchy as follows:

Towns / Urban Areas  
Key Service Centres (KSC)  
Other Villages  
Countryside

- 5.11 The Adopted Local Plan and the Issues and Options Report, did not specifically define Key Service Centres, although the assumption was implied that these were essentially the villages identified in the Local Plan as “Sustainable Villages”. However, the Preferred Options document looked again at what criteria should comprise a KSC and reviewed this accordingly.
- 5.12 **Key Service Centres** - The adopted Regional Spatial Strategy (RSS - Policy SS4) indicates that development in rural areas is to be focused on Market Towns and outside these areas in ‘Key Service Centres’. These are suggested in the RSS as villages with a good level of services, including;
- A Primary School within the village , a secondary school within it, or easily accessible by public transport;
  - Primary Health care facilities
  - Range of retail and service provision capable of meeting day to day needs, particularly for convenience shopping;
  - Local employment opportunities and
  - Frequent public transport to higher order settlements.
- 5.13 These criteria form the indicative basis for identifying Key Service Centres. This approach needs to be adapted to the Babergh context in view of its dispersed settlement pattern, with some areas remote from one of the main towns. Other criteria are considered relevant to defining these settlements in Babergh including:
- **Population size** Some larger villages in the district have a strong function in supporting the rural hinterland beyond, including many smaller villages, particularly on the Shotley Peninsula and the north west of the district. Although not particularly large places themselves, they support a number of services which are largely able to be sustained by the population of the settlement and surrounding area (plus visitors). Settlements serving such a function tend to show a relationship to the population size, for this reason settlements with a population of 1000 or more are considered for inclusion as key service centres.
  - **Location / function.** Due to the geography of the rural parts of the district, many smaller villages are remote from key centres such as Sudbury, Hadleigh or Ipswich. Although the urban areas within and beyond the district provide most opportunities for jobs, shopping and other services, the larger settlements in between these centres have an important role to play, providing closer access to many of the essential services. It is important that Key Service Centres are located within reasonable reach of the smaller villages and the rural hinterland in all areas of the district. The pattern of distribution, based on the criteria described below- (i.e., 4 of the key facilities listed plus a population of 1000 or more), ensures that all areas are well related to a KSC.
- 5.14 The village facilities survey <sup>1</sup> illustrates a fairly dispersed pattern of distribution of some of the key services, particularly health facilities. It is frequently the case that a larger settlement is lacking one of the 5 key services listed, but due to its size, location or availability of other services it has an important role in serving many of the day-to-day needs of its population and that of the rural hinterland beyond. **Key Service Centres** were therefore defined as villages with a population of more than 1000 and that have 4 or more of the 5 key services listed above (based on RSS definition).
- 5.15 Key sustainability criteria for **Other Villages**:
- Good public transport links
  - Primary school
  - Foodstore

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<sup>1</sup> BDC Village Services and Facilities Assessment 2009

### 6. The Future Growth of Babergh District to 2031 Core Strategy (Autumn 2010)

- 6.1 The overall principles of the spatial strategy approach in the Preferred Options were carried forward in this growth issues consultation. This retained the hierarchy of;
- Towns / Urban Areas
  - Key Service Centres (More local look at the definition)
  - Other villages
  - Countryside
- 6.2 It also retained the concept of sub-dividing the district into 3 areas, East, Mid and West. Scenarios for the approach to setting the level of growth were proposed (refer to Housing Technical Background Document 4.). The Growth Issues consultation did not include the distribution of growth, as options were thoroughly aired at the issues and options stage. It did however, include options for broad locations given that the available evidence suggests that whatever future growth levels are to be chosen for Babergh, it is likely that most growth will need to be accommodated by new, properly planned, strategic developments at the edges of the 3 towns, (although the KSC would need to accommodate some growth). The Growth Issues document proposed 9 potential broad directions of growth as it is in the best interests of the district as a whole to plan for some growth by way of urban extensions as part of the future strategy for growth.
- 6.3 Consultation at this stage included 4 workshops with the Town and parish Councils, which provided a valued and focused response to many issues including the development strategy and the settlement pattern. The consultation responses, covering consultation Questions Q6 to Q10 as a whole, indicate that the overall settlement hierarchy approach, as set out in the Growth Options document, was broadly accepted. However, in response to the mapping exercise carried out with the Town and Parish Councils and some of the more detailed comments coming out of the workshop events, it was felt that the Core Strategy should take a more holistic approach with less emphasis placed on population thresholds as the determining factor to identify KSCs / other villages and settlements and more emphasis placed on the actual networks that exist between settlements and their function.
- 6.4 The Submission Draft sets out the settlement pattern as a hierarchy largely unchanged in terms of the principle of urban areas being the main focus for growth, via urban extensions. However, the approach to the settlement pattern and growth in the rural areas was reviewed, introducing Core Villages, Functional Clusters and Hinterland Villages, with the countryside remaining at the end of the hierarchy.
- 6.5 The concept of “functional clusters” is based on the function of the towns and villages and the extent to which they serve the hinterland villages beyond, providing access to day to day services. The function of the villages and the clusters identified has been primarily informed by the Map based exercise completed by the majority of Town and Parish Councils in Autumn 2010. (Map 4 in the Submission Draft Core Strategy which can be found at [www.babergh.gov.uk/babergh/ldf](http://www.babergh.gov.uk/babergh/ldf) under Core Strategy (2011 – 2031) Submission Draft.
- 6.6 The strategy for growth reflects the settlement pattern, with urban extensions in Sudbury / Great Cornard, Hadleigh and Babergh’s Ipswich Fringe providing the main focus for growth, but also providing some opportunities for growth in the Core and Hinterland Villages, and regeneration at Brantham, reflecting the local characteristics and the need to ensure village services are sustained to support the extensive rural communities in the district. This Submission Draft Core Strategy introduces greater flexibility for growth in the rural areas. ‘New Directions of Growth’ on the edges of the three urban areas of Sudbury / Great



Cornard, Hadleigh, and the Babergh Ipswich Fringe will accommodate nearly two-thirds (60%) of planned growth. The distribution of the suggested homes growth is based on the following urban – rural split; 60% across the 3 urban areas and 40% across the rural areas. A total 2,500 new homes is planned in Babergh for the 20 year period, to be distributed as follows:

- 850 dwellings at Sudbury / Great Cornard, (split between an extra 350 in the vicinity of the already allocated Chilton Woods development and a further 500 to be brought forward to the immediate east of the town, at a new location and phased later on)
- 250 dwellings at Hadleigh (to the town's east)
- 350 dwellings in the Babergh Ipswich Fringe (to the west of the existing urban area in Sprooughton parish) and
- 1,050 dwellings to be accommodated in Brantham (Regeneration Project) and allowing for some growth for the Core and Hinterland Villages. Subsequent DPDs will review and consider site allocations and development boundaries as appropriate and relevant in each case. ( Note: until subsequent documents are adopted, the Proposals Map and Inset Maps [including the Built up Area Boundaries] remain as defined in the Adopted Local Plan 2006.)

### 7. Explanation of the Broad Locations

- 7.1 Delivery of a realistic scale of district-wide housing and economic growth within the existing settlement pattern in Babergh makes it likely that there will be a need for 'urban (edge) extensions'. We know that there is insufficient land available within the existing town boundaries and there is considerable pressure on what brownfield land there is in the district. Although some former employment land may be more suitable for other types of development in particular circumstances we need to recognise that we need to facilitate economic recovery and growth and ensure that employment land is available through the plan period.
- 7.2 The positive advantages of having properly planned comprehensive sustainable developments in the towns/urban fringe is that there is access to jobs, services and facilities, etc. Edge of town/urban extensions can be planned for locations to align with the capacity of existing infrastructure, or can be planned at a scale that is sufficiently viable to include new or improved infrastructure. We believe that it is more sustainable, and in the greater interests of the district as a whole, to plan for some town-edge/urban expansion in Sudbury, Hadleigh and the Ipswich Fringe. Clearly villages will have a share of the housing growth, and the amount will depend on their individual capacity to accommodate growth and the views of the local community. It is not appropriate to identify strategic sites or broad locations for potential growth in the villages at this stage, but we have considered the constraints, advantages and disadvantages of some potential areas around the towns/urban areas and have set these out as broad locations for potential directions of growth.
- 7.3 The precise location and details of phasing of new development proposed for any of the broad locations that are ultimately selected, and for smaller developments in some of the larger villages will be set out in a site allocations document. The site allocations document will follow on from the Core Strategy, and as well as being based on local housing needs in each area/settlement it will be informed by detailed assessments of a range of criteria including:
- Flood risk
  - Nature conservation constraints/designated areas and implications of an Appropriate Assessment under the habitats directive (where appropriate)
  - Landscape considerations and designated sites (e.g. AONB)
  - Historic character and conservation considerations

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- Infrastructure constraints – physical infrastructure/utilities
- Infrastructure needs (e.g. transport, open space, leisure facilities) and access to services and facilities
- Availability of brownfield land, and
- A sustainability appraisal.

7.4 Nine broad locations were proposed in the consultation on the Future Growth of Babergh District 2031, in Autumn 2010. The Broad locations proposed were all extensions to the urban areas, with 4 around Sudbury / Great Cornard, 3 around Hadleigh and 2 around the Ipswich Fringe. The Map illustrating these can be found on the web site at [www.babergh.gov.uk/babergh/ldf](http://www.babergh.gov.uk/babergh/ldf) under Growth Options Consultation (2010).

### Sudbury:

- North of Sudbury (Location 5)
- East of Sudbury (Location 6)
- South of Great Cornard/ Sudbury (Location 7)
- Potential additional option: South West of Sudbury, Ballingdon (Location 4)

### Hadleigh:

- East of Hadleigh (Location 1)
- West of Hadleigh (Location 2)
- North of Hadleigh (Location 3)

### Ipswich Fringe:

- Western Ipswich Fringe (Location 8)
- South West Ipswich Fringe (Location 9)

7.5 The constraints and Sustainability Appraisal summary for each Broad Location is set out in the Future Growth of Babergh District 2031, in Autumn 2010 which can be found on the web site at [www.babergh.gov.uk/babergh/ldf](http://www.babergh.gov.uk/babergh/ldf) under Growth Options Consultation (2010).

7.6 The consultation on these Broad Locations covered questions (11-16) relating to these locations, summarised below;

- The majority of respondents agreed to the principle that that we should plan mainly for larger developments through urban extensions
- Hadleigh. – Representations seemed to support growth in one direction only with reservations expressed about growth to the south and west due to physical constraints.
- In Sudbury / Great Cornard locations 5 and 6 were identified as the most appropriate areas for growth. Broad locations 4 and 7 were seen to have too many constraints
- Ipswich Fringe- In accepting that one or other of these locations may come forward opinion seemed to be unanimous that this should only happen if it were accompanied by improvements to the transport network and that it takes into consideration the proximity of the Stour & Orwell SPA and the need for any development to be closely reviewed through the HRA.
- Other locations proposed related to development away from the urban areas, which would compromise the over riding sustainable strategy for growth.

## **8. New directions of growth proposed**

8.1 Having considered the responses, the site constraints and the thorough assessment contained in the Sustainability Appraisal, four New Directions of Growth are favoured. The Submission Draft identifies four New Directions of Growth, two at Sudbury / Chilton / Great Cornard (identified as Broad Locations 5 and 6 in the Growth Issues and Scenarios



document), one at Hadleigh (Broad Location 1), and one in the Babergh Ipswich Fringe (Broad Location 8).

- 8.2 The New Directions of Growth, the edge of town / urban extensions, have been selected as locations that can be aligned with the capacity of existing infrastructure, or can be planned at a scale that is sufficiently viable to include new or improved infrastructure, and planned to include employment land, green infrastructure, and access to services including transport.

### **9 Sudbury / Great Cornard Policy CS3**

- 9.1 The Submission Draft includes a policy for Sudbury and Great Cornard, to guide development to reflect particular important characteristics or infrastructure issues which emerged from the earlier work in assessing the broad locations. This includes a phasing requirement, also picked up in the Monitoring Policy CS18 (see below), to provide the opportunity for the existing Local Plan Policy CP01 for the Chilton Mixed Use development to come forward during the early part of the plan period and prior to the other New direction of growth to the east commencing.
- 9.2 In addition the policy requires high quality design, structural landscaping and layouts and scale of development that respects the adjacent landscape and townscape features. It also seeks to avoid creeping coalescence with adjacent settlements. Also identified is the need for a green infrastructure framework, connecting with and adding or extending formal and informal green space, wildlife areas and natural landscape settings and features. Finally also important is to ensure good links and / or enhancement of existing links for pedestrians and cyclists to the town centre, railway station, employment areas, schools and bus stops etc. Policy CS10 sets out sustainability criteria which all development must comply with.

### **10. Hadleigh Policy CS4**

- 10.1 The Submission Draft includes a policy for Hadleigh, to guide development to reflect particular important characteristics or infrastructure issues which emerged from the earlier work in assessing the broad locations. The natural and physical constraints and sensitive landscape setting of Hadleigh limit the amount and direction of growth and further development to the east of the town will rely on implementation of the A1071 / Lady Lane roundabout for access and will, in effect, be an extension of the Local Plan (2006) mixed use allocation in Policies HS15 and EM03.
- 10.2 The A14 and A12 are important communication routes essential to the local economy, and congestion at the Copdock junction should not be exacerbated by development in this area. Attention is drawn to Policy CS17 and the table in Appendix 3, and to the need for early consultation with the Highways Agency. The policy requires, high quality design, structural landscape planting, and layouts and scale of development that respect adjacent landscape or townscape features, and maintain the separate identity of Hadleigh. In addition development must ensure provision of a green infrastructure framework connecting with and adding or extending formal and informal green spaces, wildlife areas, and natural landscape settings and features.
- 10.3 Also important are good links and/or the enhancement of existing links for pedestrians and cyclists to town centre shops and services, employment areas, schools, bus stops, etc. Policy CS10 sets out sustainability criteria which all development must comply with. The creation of mixed and balanced sustainable communities means that a proportion of Babergh's growth should be accommodated in the Ipswich Fringe area to provide the opportunity for homes and jobs close to existing jobs and services and good public transport links.

### 11. Ipswich Fringe Policy CS5

- 11.1 The creation of mixed and balanced sustainable communities means that a proportion of Babergh's growth should be accommodated in the Ipswich Fringe area to provide the opportunity for homes and jobs close to existing jobs and services and good public transport links. The Submission Draft includes a policy for Babergh's Ipswich Fringe, to guide development to reflect particular important characteristics or infrastructure issues which emerged from the earlier work in assessing the broad locations.
- 11.2 The A14 and A12 are important communication routes essential to the local economy, and congestion at the Copdock junction should not be exacerbated by development in this area. Attention is drawn to Policy CS17 and the table in Appendix 3, and to the need for early consultation with the Highways Agency.
- 11.3 The landscape character of the fringe of Ipswich is attractive and also of significant importance due to its proximity to the sensitive landscapes associated with the Stour and Orwell Estuaries, Special Protection Area and Ramsar sites. It is therefore important that the policy requires development to be based upon and designed around a green infrastructure framework providing high quality design, structural landscape planting, and connections to or potential links with existing formal and informal green spaces, wildlife areas, and natural landscape settings and features, particularly the Gipping Valley footpath, Chantry Park and Belstead Brook Park, ensure a separate identity and avoid creeping coalescence with adjacent settlements. Policy CS10 sets out sustainability criteria which all development must comply with.

### 12. Other Locations / Alternatives

- 12.1 In 2010, as part of more detailed work to plan ahead for site specific planning matters, an invitation was issued for landowners, developers, etc. to submit site specific locations or outline development proposals. This was necessary to develop the evidence base and to allow more clarity on how broad directions of growth for the urban areas could be taken forward. For current purposes, it is not necessary to cover details of the many site proposals suggested, most of which were to accommodate growth at relatively modest scale in locations throughout the district.
- 12.2 However, in response, 2 submissions were received representing related but alternative proposals for major new development, allowing for both employment growth and delivery of new homes. Each proposal cited that it could be regarded as of not just a district-wide scale / importance but also, potentially of a regional or even national level of importance. In terms of meeting the scale of needs that is envisaged by the current regional Plan and this draft Core Strategy, the amount of land involved would be sufficient to meet most or possibly all of the suggested new homes growth and a range between most or more than all of the suggested level of jobs growth. Although very little clarity is available on the scale of housing growth sought, the larger of the 2 ideas indicates that it could provide for over 15,000 new jobs.
- 12.3 The alternative proposed and considered by Babergh District Council is of a development of the scale of a small, virtually free-standing, new town. Clearly, it would offer a potentially alternative approach to Babergh's growth and development strategy – and in that way could be regarded as relieving growth pressure on other locations. A question then arises as to whether this approach would be seen as meeting all (or most) of the growth needs of Babergh in one location and whether that would be desirable or not. Otherwise, it could conceivably be approached as a development that meets some or most of Babergh's growth needs but with much or all of its rationale being concerned with meeting wider (regional or national) growth needs, at a location that happens to be within Babergh. As

such there are 2 different ways of looking at these proposals but they are not mutually exclusive.

- 12.4 One of the 2 alternative propositions envisages creation of a new 'Dryport' facility, to be developed to provide an intermodal, freight transport interchange, with the specific aim of switching freight (especially containers) from road to rail. This location includes land adjacent to the Ipswich-London mainline railway and would be near the A14 / A12 intersection, thus allowing the potential for such a facility. A Dryport facility is envisaged as being supportive of the complex of Haven Gateway ports (Felixstowe, Ipswich, Mistley and Harwich) and their sustainable growth.

### 13. Assessment of Alternatives

- 13.1 The early stage 'Issues & Options' report exercise in early 2009 floated a range of 5 different ways to accommodate the district's growth in future, referred to above. The new settlement approach was one of the 2 least favoured options among the responses received. In addition, the sustainability appraisal carried out also identified this as the approach with most negative results. Members of Babergh District Council Strategy Committee, at its meeting on 13 May 2010, gave some consideration to the suggestion of accommodating the district's future growth through a new settlement approach and it received some discussion but was not generally supported or taken forwards. In terms of changes of circumstances since then, there was no actual proposal for them to consider at that time, nor one that was specific in locational or other terms (such as scale, form, etc.), so it was considered purely on a conceptual / theoretical basis.
- 13.2 Babergh and the Haven Gateway Partnership have worked together as partners in the European Dryport project since 2008 ([www.Dryport.org](http://www.Dryport.org)) with this idea being explored and indicating the potential benefits of a Dryport facility to serve the Haven ports and Felixstowe port in particular. Whilst the merits of creating a Dryport facility to serve the Haven ports (wherever that should or could be located) are accepted in principle, the issue becomes rather more complex to consider if it is tied with proposals for substantial residential development that may represent the overall development strategy for Babergh. If that is not considered to be the case, then a reasoned justification with appropriate evidence for a regional or national type facility to be located here (as with anywhere else) is necessary.
- 13.3 In either case, the necessary body of solid, supportive evidence, together with a thorough consideration of potential alternative options (in line with the planning approach followed for this Core Strategy) is absent. On that basis, the Council do not support this idea as an alternative to the approach that has been formulated for Babergh over the course of time.

### 14 Explanation of the approach to growth in rural areas.

#### 14.1. Policy CS6

- 14.1.1 The approach towards growth in the rural areas reflects the local characteristics of the district and the strong and important role of the villages and rural communities. It is vital that services are sustained in the rural areas, in particularly in the areas remote from larger towns. In order to maintain the communities it is important to balance growth with wider environmental, social and sustainable considerations. The policy sets out criteria to build in enhanced flexibility to growth in the rural areas, looking more broadly at the relationship between adjoining settlements and beyond. The advantages include;

- **Greater flexibility in the provision of affordable housing.**
- **Greater flexibility in the allocation / take up affordable housing;**
- **Flexibility in the provision and location of facilities;**

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- **Flexibility in the provision and location of leisure and recreation facilities.**
- **Flexibility in provision of employment**

14.1.2 The alternative approaches considered are outlined above in the explanation of the settlement pattern policy

### 14.2 Brantham

14.2.1 The Former Industrial site at Brantham poses an unique challenge, which was formerly addressed in the Adopted Local Plan, through Policy EM06. To further the guidance in the Local Plan, the council also prepared a Planning Position Statement for Brantham, which can be viewed on the council's web site at [www.babergh.gov.uk/babergh/ldf](http://www.babergh.gov.uk/babergh/ldf) under planning statements and commercial appraisals.

14.2.2 Much of the site is derelict, with buildings in need of demolition and land in need of decontamination. However, there is a significant and apparently thriving remaining operation by ICI Ltd, known as Imagedata. There are many constraints and challenges associated with this site, including flood risk issues, areas of wildlife significance on parts of the site, and possible contamination issues, however, due to the large scale, derelict nature of this land it is not acceptable to do nothing. Regeneration of the site needs to be progressed.

14.2.3 It will be expected that green infrastructure will be central to the character and layout of such a scheme in accordance with Policy CS10 (particularly with regard to providing mitigation within the proposed development for potential recreational impacts on the SPA and Ramsar site), and that it will deliver new employment buildings, new dwellings and improved community facilities proportionate to the amount of development permitted, all in accordance with an agreed Master Plan. A high quality development will be sought, particularly in the event that riverside development is sought.

14.2.4 The masterplan and mitigation strategy will need to ensure that direct and indirect negative impacts on the integrity of the Stour and Orwell Estuaries SPA and Ramsar Site are avoided. In particular, provision of alternative Natural Green Space will be required, in line with the Haven Gateway Green Infrastructure Strategy.

### 15. Explanation of Infrastructure Delivery and Monitoring

15.1 The Issues and Options consultation raised broad social, physical and green infrastructure issues. This identified the various elements of infrastructure provision and consulted on the relative importance of these and the role of the Core Strategy in addressing issues to secure appropriate infrastructure provision.

15.2 Your responses indicated that the Core Strategy should address the provision of green infrastructure, consider the provision of social infrastructure on a case-by-case basis, and make some provision for social infrastructure. In terms of physical infrastructure your responses indicated that the Core Strategy should include a policy on infrastructure provision, and that you prefer implementing a range of approaches to ensure that appropriate physical infrastructure is provided, including approaches such as applying for grant funding for infrastructure.

15.3 Based on national and regional guidance, consultation responses and stakeholder feedback the preferred approach is to include a policy to:

- ensure that new development makes appropriate provision for infrastructure;

- ensure that development is appropriately phased to allow for infrastructure improvements when required;
- include a range of options to ensure that appropriate social, physical and green infrastructure are provided; and
- to include strategic infrastructure requirements to implement the Spatial Strategy.

### 16. Policy CS17

- 16.1 The Submission Draft provides a policy on Infrastructure provision, which includes all types of infrastructure and also refers to current and emerging delivery mechanisms (including future adoption of a Community Infrastructure Levy). It links in with other policies, in particular the area policies which relate to New directions of growth and the infrastructure requirements associated with securing good mixed and balanced communities in those areas. The policy includes reference to Appendix three, which sets out the known, or potential infrastructure requirements. This appendix, also deals with the monitoring requirements for all policies in the core strategy. This approach has emerged following consultation, and emerging guidance to seek to build in adequate certainty, flexibility, and to demonstrate the ability to deliver.

### 17. Policy CS18

- 17.1 The Issues and Options referred to monitoring as a requirement through existing measures such as the Annual Monitoring Report, although not published, the Preferred Options document (May 2010) appended a Monitoring Framework, but did not include a policy.
- 17.2 The Submission Draft includes a policy for monitoring, as it is considered to be an advantage to tie up many threads throughout the Core Strategy, to also make the required links with phasing, delivery and flexibility. Policy CS18 provides a policy link with ongoing monitoring requirements, as well as specific monitoring related to phasing and also requirements arising from the Habitats Regulation. Finally it builds in flexibility, to reflect the current uncertainties associated with the changing legislative world of planning.