I am supportive of the Babergh & Mid Suffolk Joint Local Plan Preferred Options Consultation Document July 2019 and wish to congratulate the hard work of the Planning Officers in producing a comprehensive planning strategy document (along with ancillary documents) in such a clear and concise manner. I provide more detailed comments below and also raise a number of points that I consider should be addressed before the Plan proceeds to the next stage.

1. Vision and Strategic Objectives should be much stronger and clearly laid out as this is a key component of the Plan. 
[See Section 2 Vision and Section 3 Spatial Strategy of the adopted Plymouth & South West Devon Joint Local Plan for a good example https://www.plymouth.gov.uk/sites/default/files/JLPAdoptedVersion.pdf].

2. Sustainability and the Presumption in Favour of Sustainable Development should be the main starting point of the Plan rather Housing Needs and Requirements. The preparation of a “development-led plan” reflects “old-school” local planning from the 1980s and 1990s. The plan should be reconfigured so that it is “sustainability-led” reflecting the current National Planning Policy Framework (February 2019). 
[See Section 3: Sustainable Places of the Draft Chiltern and South Bucks Local Plan 2036 and Section 4: Managing Growth of the Brentwood Borough Local Plan Pre-Submission Document February 2019 for examples].

3. The Plan in the Housing Needs & Requirements Section reads somewhat like a Technical Paper. It is questioned whether Affordable Housing Mix Tables etc would be better incorporated within an Appendix or Background Paper?

4. Support for Policy SP03 Settlement Hierarchy and the identification in Table 2 of four Hamlet Villages for Lawshall:
   Lawshall – Bury Road
   Lawshall – Lambs Lane
   Lawshall – Street
   Lawshall – Lawshall Green

   Key components of the policy are supported:
   - scale and location of development will depend upon the role of settlements within the settlement hierarchy defined in Table 2 and Table 3 and the spatial distribution, the capacity of existing physical and social infrastructure or new/enhanced infrastructure, as well as having regard to the built and natural environment.
- Settlement boundaries to meet the development needs of the Plan
- Design is sympathetic to its rural surrounding
- Hedgerows and treelines protected
- The cumulative impact of proposals will be a major consideration.

5. Support for the methodology undertaken on the Topic Paper: Settlement Hierarchy Review (July 2019) which clearly establishes a robust scoring system which enables the categorisation of settlements as Core Villages, Hinterland Villages or Hamlet Villages. Whilst there are a few errors in the matrix (for example covering the roll-out of super-fast broadband) I do not think they will impact on the overall classification.

In the context of Lawshall and Shimpling it should be noted that the Suffolk Norse CON375 service will unfortunately be cancelled from 4 November 2019. The School timetable BE375 service will not provide a daily peak-time service for rural workers commuting to Bury St Edmunds. Assuming that there are no late revisions to the “proposed sponsored bus service changes” it is suggested that this and other alterations to the rural bus services are taken on board in the Settlement Hierarchy Review as they will have a material impact.


6. Support for Policy SP04 Housing Spatial Distribution with the proviso that Table 04 – Minimum housing requirement for NP Areas (Babergh and Mid Suffolk) should be expanded to cover all towns and most parishes within the two districts and not just Neighbourhood Plan Areas. This change is essential to ensure that towns and parishes take their appropriate share of development and not just those settlements that have embarked upon the preparation of a Neighbourhood Plan.

The figures in Policy SP04 are heavily slanted towards those Core Villages, Hinterland Villages and Hamlet Villages that have prepared or are in the process of preparing a Neighbourhood Plan. This is clear when looking at the figure of 28 dwellings for the Lawshall Hamlets (which interestingly have already been granted planning consent) which represents 23.7% of the 118 New homes (2018-2036) for Hamlets in Babergh in the Policy SP04 Table.

I make the case that most parishes whether they are Core Villages, Hinterland Villages and Hamlet Villages should have an indicative housing requirement figure and should not be camouflaged within a “plucked” or rounded up (or down) 500 New homes (2018-2036) ‘Windfall’ figures for both the respective Babergh and Mid Suffolk Districts.

It is considered extremely helpful if the Joint Local Plan includes this form of policy as incorporated in the adopted Plymouth & South West Devon Joint Local Plan:

“Provision in the order of ….. homes will be sought from the sustainable villages as part of the overall housing supply for the ........[District]

The LPAs support the preparation of neighbourhood plans as a means of identifying local housing and other development needs in the sustainable villages. Development within the sustainable villages, including the indicative level of housing set out in Figure …., should be provided through neighbourhood plans, unless such provision would conflict with other policies of the JLP.
Within sustainable villages without neighbourhood plans the LPAs will still support
development that meets the identified local needs of local communities and development
which responds positively to the indicative housing figures set out in Figure ...... All
development proposals, whether in villages which have neighbourhood plans or not, will be
considered against the other policies of this plan.”

“Figure ......: Indicative Levels of New Housing in Sustainable Villages

Villages able to accommodate around 30 dwellings each. ......................

Villages able to accommodate around 20 dwellings each. ......................

Villages able to accommodate around 10 dwellings each. ......................”

[See Policy TTV25 Development in the Sustainable Villages and Figure 5.8. Indicative Levels of New
Housing in Sustainable Villages of the adopted Plymouth & South West Devon Joint Local Plan.]


7. Numerous references are made to Neighbourhood Plans within the Joint Local Plan however there is not currently an over-arching policy establishing how the Joint Local Plan is joined to the
Neighbourhood Plan process. This matter needs to be clarified as a matter of urgency by the District
Council. It is an issue of particular importance to those communities that have spent or are currently
spending numerous man hours preparing their own locally based development plan. The Joint Local
Plan needs to provide complete and unequivocal policy guidance on how the two development plan
strands can sit together particularly where there is a real danger that the Joint Local Plan and a
Neighbourhood Plan may contradict each other.

Neighbourhood Plans have the distinct advantage of being able to go into the level of detail that it
would be inappropriate for a JLP to cover. In this respect it would be helpful if the JLP sets down a
local framework that Neighbourhood Plans may accommodate to support the JLP. This may include:

- landscape character assessments;
- "areas of local landscape sensitivity";
- "settlement gaps" and "important views";
- areas of biodiversity importance (including sites of local importance such as County Wildlife
Sites);
- ancient hedgerows;
- "visual and/or recreational amenity areas" (AVRA)
/ important recreation and local green spaces;
- new residential or employment allocations (and sites with current planning consent);
- car parking provision; and
- community infrastructure.

However, it is not clear whether a NP will be encouraged to amend other aspects of the Place Maps
in the new JLP such as Settlement Boundaries, definitive Rights of Way, Conservation Area
boundaries and Listed Buildings? This needs to be clarified.
How will loosely worded development policies in some current NPs sit with the emerging fine-grained Place Maps in the JLP? This position also needs to be clarified.

8. With regard to Section 12 Protection and Management of the Environment Strategic Issues and the Protected Habitats Mitigation Zones Map (and the Babergh and Mid Suffolk Local Plan: Habitats Regulations Assessment including Appropriate Assessment June 2019) it is noted that RAMS have a 13km Zone of Influence while the Waveney and Little Ouse SAC and Redgrave and South Lopham Fen have a 5km Zone of Influence. The Breckland Special Protection Area also has a Zone of Influence and probably follows a similar pattern with standards being reduced from 13km to 5km. A firm justification should be provided for using 5km, when 13km has been used by the District Council for internationally designated wildlife sites when undertaking HRA Screening Assessments for previous plans. Changes of this nature could impact upon Policy SP09 Cross-boundary mitigation of effects on Protected Habitats Sites.

9. Support for Policy LP01 Hamlets and Clusters of development in the Countryside which allows development within the settlement boundary of identified hamlets. Particular support for Paragraph 3 which states:

Para 3. Proposals which would consolidate sporadic or ribbon development or the infilling of large gaps or extending edges, will be resisted. The cumulative impact of proposals will be a major consideration as development should be proportionate to the location and context, having regard to the level of local infrastructure provision.

10. Policy LP05 Replacement Dwellings and Additional Dwellings on Sub-Divided Plots Within Settlement Boundaries should be modified to also cover Infilling and Back-land Development. Possible wording could include:

“Development proposals involving infilling, back-land or the complete or partial redevelopment of residential garden land (and adjoining agricultural land) will be permitted if the scheme:

1. Does not adversely impact on the visually important landscape characteristics of the area or the street scene;
2. Is appropriate to the surrounding area in terms of land use, size and scale;
3. Maintains, or where possible, enhances the character and appearance of the area, reflecting the variety of local dwelling types;
4. Does not involve the inappropriate sub-division of existing curtilages to a size below that prevailing in the area or the street scene, taking account of the need to retain and enhance mature landscapes;
5. Presents a frontage in keeping with the existing street scene or the prevailing layout of streets in the area, including frontage width, building orientation, visual separation between buildings and distance from the road;
6. Does not result in the loss of biodiversity or damage to an essential habitat corridor or network; and
7. Does not result in the ‘tandem’ development of residential garden land and/or adjoining agricultural land.”

11. General support for Policy LP17 Biodiversity in particular:
- All development should follow a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity.
- Significant weight has been given to the protection of designated and potential designated sites.
- Plan positively for the creation, protection, enhancement and management of local networks of biodiversity with wildlife corridors that connect areas.
- The development’s primary objective is to conserve and enhance biodiversity.

A request is made that local level designations - County Wildlife Sites, County Geodiversity Sites/Regionally Important Geological and Geomorphological Sites are included in Policy LP17 given that reference is made to them in Paras 15.13 and 15.14 of the background text.

12. General support for Policy LP18 Landscape in particular:
   - Development in suitable locations which will not adversely affect the natural environment including; landscape character sensitivity and visual impacts of the proposal on the wider area
   - New development that integrates positively with the existing landscape character of the area and reinforces the local distinctiveness.
   - Proposals that are sensitive to their landscape, visual or amenity impacts (including on dark skies)
   - Development that enhances and protects landscape value such as; locally characteristic landscape features.

Reference should be made in Policy LP18 to areas of higher landscape value / local landscape sensitivity that should be subject to greater levels of protection so that any development proposals protect or enhance the special landscape qualities of the area and are designed and sited so as to harmonise with the landscape setting. A cross reference should be made to Neighbourhood Plans that define "Areas of Local Landscape Sensitivity".

It is obvious that there is a "Discounted alternative approach" as the existing Special Landscape Areas that have been the bedrock of landscape planning policy for the last 30 years or so have been “air-brushed” from Joint Local Plan without reference. The justification for their removal should be properly explained as well as the development implications for those areas that are currently designated SLAs in the adopted Babergh Plan. At the same time the inconsistencies between the adopted Forest Heath and St Edmundsbury Local Plan Joint Development Management Policies Document (February 2015) and the Preferred Options Consultation Document July 2019 should be recognised and justified. Planning policy should always be "joined-up" between respective Local Authorities and Babergh DC must explain why SLA status should now be terminated on the Stanningfield / Lawshall Parish boundary.

A key question that the District Councils must also answer is to determine how many towns and parishes in Babergh and Mid Suffolk will lose their SLAs? What will be the implications for development in these areas of high landscape value (as defined in the current adopted Local Plans)?

13. Support for the way that the Place Maps have been defined in the Joint Local Plan enabling some freedom and flexibility for a suitable degree of infilling and residential growth. In particular:

  - Support for the Place Map for Lawshall – Bury Road (Hamlet);
- Support for the Place Map for Lawshall – Lambs Lane (Hamlet) with the proviso that the recent planning approvals DC/17/06274/OUT, DC/18/01758/FUL and DC/18/02155/OUT should be incorporated within the Settlement Boundary along with The Willows Care Home, Bury Road;
- Support for the Place Map for Lawshall – Lawshall Green / Hibbs Green (Hamlet); and
- Support for the Place Map for Lawshall – Street (Hamlet) with the proviso that the recent planning approval DC/18/03666/OUT should be incorporated within the Settlement Boundary.

14. The Settlement Boundaries of towns and parishes within the District should be amended to include recent planning approvals in order that the emerging Joint Local Plan is kept as up to date as possible. If this is not feasible the matter should be covered by a suitable explanation within the Plan.

Richard Livall