

## Babergh & Mid Suffolk - a Green vision

*The key issues have been reordered, with some national comparatives added, some additional points and textual changes to improve clarity.*

### Vision and objectives

Q What do you think the vision should be?

To improve the quality of life and the health and well being of the citizens of Babergh and Mid Suffolk while ensuring the two districts contribute to carbon reductions targets agreed in international governments in Paris.

Do you agree with the identified objectives

No. If the objective is to maximise the health and well being of citizens, as we suggest, then other objectives follow. The two rural districts have become very car dependent in the past couple of decades as public transport subsidies have been slashed, as new housing developments are built in without any significant investment in cycling, walking or public transport.

We believe a key objective should be “To lessen car dependency for citizens of the two districts.”

The way to achieve this would be to cease investment in new roads, but better maintain the roads we already have, invest more in public transport, cycling and walking. Planning objectives should steer developers towards homes within walking or cycling distance of public transport hubs and shops, GP surgeries and other facilities. In that way new developments would not increase car dependency.

This would improve health, help improve the sense of community and wellbeing in towns and villages, reduce congestion and pollution and cut carbon emissions.

We also object to the hidden economic objective in this document which is “growth” for the sake of growth. Not all businesses or villages want to grow. A thriving economy does not have to grow over all to ensure a good quality of life for people.

We completely disagree that the “Ipswich Northern Route” should be a priority or the “key economic driver of the county”. Building more roads will create more car dependency and therefore more traffic, more pollution and more carbon emissions. Rural single carriageway roads through the centre of villages like Hintlesham which will feed this new northern bypass, will be choked by ever more traffic, triggering demands for more roads and more houses to provide the money for them, which in turn will drive more traffic and car dependency. There is no end to this vicious cycle that planners and successive governments seem to want to encourage. The long standing rural charm of the two districts, and the quality of life of its citizens and the natural environment including will be destroyed by the incessant demand for ever more roads and houses.

For the same reasons we disagree with the objective of “supporting the development of proposals for a Sudbury Western Relief Road.”

The county council spent £375,000 on a report in 2002 which concluded that the Western Relief Road was not the best solution to Sudbury’s congestion problems. It recommended investment in public transport, cycling and walking and a PR campaign to show people that the authorities gave priority to walking, cycling and public transport in the town rather than cars. The 2016 “outline business case” also commissioned by Suffolk County Council does not provide any data on traffic by which people can make a judgement. It simply predicts using an unexplained model. This is not a basis by which to make a policy.

See “vision and objectives” section for further details below.

## Key Social Issues

### A Growing Population

The population is expected to continue to grow over the period 2014 to 2036. The official 2014 Sub-National Population Projections identify an increase of around 8,000 people in Babergh and around 13,000 people in Mid Suffolk. This represents increases of 9% and 13% respectively, compared to the forecast national average increase of 14% over that period.

### An aging demographic

The Districts have similar demography with fewer than average younger people and a higher and rising proportion in older age groups. Both districts have a below average population 0-44 and above average 45+ when compared to all of England. In addition, a significant percentage of the population are aged 65 years or older (21% in Babergh and 20% in Mid Suffolk which is above the national average of 18%, significantly in the case of Babergh <sup>15</sup>). Babergh and Mid Suffolk also have a relatively long life expectancy at about 81 years for males and about 84 years for females <sup>16</sup>. As life expectancy increases across the country, there will be different demands on services and facilities, in particular housing and medical care.

### Open Space

Whilst there is extensive countryside previous assessments for Babergh and Mid Suffolk have identified a deficiency in accessible formal provision, this includes - Neighbourhood Equipped Areas for Play (NEAP) and Local Equipped Areas for Play (LEAP), outdoor sports provision and allotments. Publicly accessible woodland in Mid Suffolk are at the bottom of the league table for Suffolk and below the national average for % of population with access to a 2Ha wood within 500mtrs National average 21.1% Babergh 6.8% Mid Suffolk 4.6%

For % of population with access to a 20Ha woodland within 4 km National average 72.8% Babergh 32.5% and Mid Suffolk 45.2% Given the research clearly showing the health and mental wellbeing gained by spending time among trees, we propose a policy that;

### Access and Isolation

In Babergh 69% of the population and in Mid Suffolk 75% of the population live in a rural location. For the rural population without the personal use of a car, access to basic services such as shops, medical facilities and leisure activities is a growing problem as bus services are progressively withdrawn. For older and retired people, this can lead to a growing sense of isolation, especially if no extended family live locally.

### Education

Educational attainment at GCSE level is in line with Suffolk and national averages. However many pupils access 6th Form education outside of the Districts including at Ipswich or Bury St Edmunds.

### Housing Need and Affordability

House prices on average are around 9 times above the average earnings of residents and rural parts of the Districts are unaffordable for many, whether seeking to buy or rent. Social housing provision has decreased through ‘right to buy.’

### **Income Deprivation**

Although deprivation levels are low compared with national levels, pockets of deprivation exist in rural areas, as well as in the main towns. Across Suffolk 28% of those identified as income deprived live in rural areas.<sup>17</sup>

### **Low Crime Levels**

Babergh and Mid Suffolk benefit from low levels of crime and levels of unemployment have been decreasing recently, continuing below national averages.

## **Key Economic Issues**

### **Economic base**

The economic sectors that achieve growth in Babergh and Mid Suffolk are tourism; creative industries; food production, construction and related services; hospitality/ leisure. Babergh is near the level of the county with regard to business formation rates, however Mid Suffolk currently lags with the lowest rates in Suffolk.<sup>18</sup>

### **Employment**

The employment rate of the working age population (between 16 and 64 years ) fluctuates around the England average for Babergh and higher for Mid Suffolk. In 2015, the employment rates in the Districts were 73.7% and 79.7% respectively, compared to an England average of 73.9%.<sup>19</sup> The Districts economy is however based on low average wages, and productivity continues to be below UK levels. (Joint Strategic Plan)

Actual unemployment rate for Suffolk is 4.2% (June 2017 – Suffolk Observatory) -v- 4.3% national (ONS)

### **Projected growth**

Research in 2016 suggests that Babergh is due to see a 14% increase in jobs and Mid Suffolk to see a 13% increase from 2011 – 2031, which represents a slow down when compared with past trends. The overall growth in jobs is expected to be driven by growth in the Professional and Business Services.<sup>20</sup>

### **Need for land**

The largest employment land needs requirement in both Babergh and Mid Suffolk will be for general office (B1a), Science Park and Small Business Units (B1b), and Distribution (B8).<sup>21</sup>

### **Town centres**

Conventional retailing is under pressure from on-line trading, although vacancy rates in town centres in Babergh & Mid Suffolk are below the national average. However, it is acknowledged that there is a need to enhance the town centres and support the hospitality and entertainment sectors, including the night-time economy.

### **Energy production, distribution and use**

Mid Suffolk has significant renewable energy production with wind turbines at Eye as well as a power station burning chicken litter. Municipal waste is burned to produce electricity at Blakenham. Both Districts have installed photo-voltaic panels on much of their housing stock, in addition to some private house-holders and businesses. Progress is being restricted in places by insufficient local grid capacity. Applications for large scale solar farms have so far been rejected. Recent data on the carbon footprint of the districts is not available, but the need for a low carbon economy will be an increasing priority.

## **Key Environmental Issues**

The dominant issue for the rest of the 21<sup>st</sup> Century will be climate change, both adapting to continuing change and contributing to mitigating its eventual extent. This will necessitate balancing the growing population with protecting and strengthening the environment.

### **Environmental assets**

The Districts have a rich environment, with a number of protected areas such as Sites of Special Scientific Interest (SSSI) sites, Ramsar sites (wetland of international importance), Special Landscape and Protection Areas (SPAs and

SLAs), County Wildlife Sites (CWS) and Area of Outstanding Natural Beauty (AONBs). This richness is a major contribution to the Districts being very attractive places to live and work, under-pinning the local economy.

### **Biodiversity**

An unprecedented extinction event is underway, and climate change will put biodiversity under growing pressure, so habitat enhancement as well as protection will be essential. Significant areas of priority habitat / species have been recorded. Some priority habitat / species identified is in adverse condition.

### **Water**

Water is a key environmental issue to be addressed in terms of demand reduction, supply, river quality and flooding. Along river courses there are areas at risk of flooding. Areas with risk of coastal erosion have been identified in the south of the Babergh District. The Districts need to improve water quality in a number of identified areas and provision of water infrastructure is essential to ensure infrastructure capacity is available for any new development. Adequate foul water processing will be needed.

In an area of relatively low rainfall, housing and industry should maximise the use of rainwater systems to minimise the use of groundwater.

### **Air**

Climate change mitigation will be achieved primarily through reducing CO2 emissions from homes, transport, business, electricity generation and agriculture. Air quality is also a key issue that needs to be considered. One area in Sudbury is identified as an Air Quality Management Area.

### **Geology**

There are areas within both districts that are identified as having geological importance (Regionally Important Geological and Geomorphological Sites and County Geodiversity Sites<sup>22</sup>).

### **Heritage Assets**

Babergh and Mid Suffolk are rich in heritage assets<sup>23</sup>. In Babergh there are 29 designated conservation areas (36% of all 79 villages and towns) and 2985 listed buildings, 34 scheduled monuments and 5 registered parks and gardens which represent about 20% of the estimated 13,700 designated Heritage Assets in Suffolk. In Mid Suffolk there are 34 designated conservation areas, 3419 listed buildings, 18 buildings at risk, 36 scheduled monuments and 2 registered parks and gardens; which represents more than a quarter of all Heritage Assets in Suffolk (Historic England May 2016, Heritage Counts, April 2014).

### **Landscape**

There is a significant extent of quality landscape including European and nationally designated areas within both districts. Babergh in particular is part of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Dedham Vale and Stour Valley Area of Outstanding Natural Beauty.

### **Material Assets**

Both districts have a high volume of Grade 3 and 2 Agricultural Land and limited available previously developed land. Recycling performance is currently lower than the County average in both districts. River valleys include considerable current and exhausted sand and gravel deposits, but careful choice of extraction sites is vital to avoid harm to ecology and landscape.

The instigation of a brownfield site register should help address availability of previously developed land.

With such a rich but sensitive natural and built environment the pressure of new development will need to be carefully managed.

## Vision and objectives

Q1 There needs to be a clear vision for each district and this needs to be in context of the wider county of Suffolk especially in relation to Suffolk's aspiration to be "the Greenest County".

**A proposed vision for Mid Suffolk and Babergh districts is:**

- Over the lifetime of the plan Mid Suffolk will continue to be a sought after place to live sustainably where housing developments will be designed to a high quality and be low carbon in both build and use.
- Residents will all have access to revitalised green spaces and to community facilities either locally or via well connected public transport. Excellent health services, education, training and leisure amenities will be available regardless of age or ability - enhancing the well-being of all.
- Mid Suffolk's low carbon economy will improve equality and contribute to enhancing the natural and historic environment. With superfast broadband, residents will be able to work sustainably from home or in businesses located in well-serviced areas.
- Climate change will be mitigated through more sustainable travel, living and working.
- Residents will be proud to live in a green, innovative and caring district.

Q2 – the stated objectives reflect planning policy outcomes rather than quality outcomes for residents.

Q3 - Specific objectives should include:

### **Resilient Low Carbon Infrastructure**

- To enable provision of the necessary infrastructure to support residents, businesses, communities, the environment and individuals.
- To prioritise investment in low carbon strategic services and infrastructure, improving connectivity and service provision.
- To minimise use of energy and water – homes, businesses and construction processes
- To ensure investment in transport is focussed on sustainable transport, such as bus and rail services, cycling and walking.
- Support the strengthening of Ipswich and the surrounding area as the key economic driver of the County.

### **Active Communities Taking Control**

- To support communities to deliver plans and projects at the district and neighbourhood levels, specifically providing opportunities to for the District Councils supporting communities on the development on neighbourhood plans.
- To support active and healthy lives, backed by quality health services
- To work with the communities of Sudbury and Stowmarket in the development of a vision and strategy for both towns.
- We do not support the development of proposals for a Sudbury Western Relief Road project.
- We do not support the 'Ipswich Northern Route' project.

Q4 – priority to enhance landscape and heritage – this is what residents and visitors enjoy about living here and businesses like to see. every development should enhance Mid Suffolk District's environment and heritage.

## Duty to Cooperate

The framework of the JLP is to cherry pick the NPPF and to ignore not only the letter of that document but also its spirit of a bottom up process based on local involvement at the community level.

It is not clear to see where the authority is derived from to ignore the NPPF as a whole document. Many important sections within the JLP commence with a reference to paragraph 156 of the NPPF and this leap frogs over the need to; '*reflect the vision and aspirations of local communities*' (para 150), '*be consistent with the principles and policies set out in this Framework*' (para 151), '*Early and meaningful engagement and collaborations with neighbourhoods*'

(para 155). By starting at 156 the need to engage and involve local communities is not fully addressed. The present process of consultation is not a substitute for proper engagement.

Q6 Add to the key planning issues

- Climate change impact of development including infrastructure across the county and the region.
- Ensuring consistent approach to environmental sustainability and mitigation for climate change

## Housing Requirement

This is now subject to renewed uncertainty as Government is consulting on a further change to the method of calculating the requirement.

Introduction cites the 'Building our Industrial Strategy' Green Paper, saying 'housing is a key factor driving economic growth'. This is a weak strategy; Investment in public transport infrastructure, and repair and maintenance of roads creates more jobs for the same amount of investment compared to constructing new roads (Apollo Alliance 2010).

A new local economic strategy is being presented to Mid Suffolk Cabinet in December 2017 and this will influence policy. The LEP strategy was updated in October 2017.

It is not clear how any current or future changes to Government policy will be taken into account. Latest Government consultation figures suggest an Objectively Assessed Need (OAN) of 12,606 which gives 573 a year, or 446 a year after completions, permissions etc.

*The table page 21 needs column headings to show that column 1 figures are for 3 years and column 4 figures for 19 years.*

HD1 – support that a contingency of reserve sites should be identified.

Q7 Challenge numbers as according to 2011 census 4019 people have a second home in mid Suffolk. So do we need 9,951 more houses? (cited in Guardian Data Blog

<https://www.theguardian.com/news/datablog/2012/oct/22/second-homes-england-wales-detailed> )

Q8 Identifying contingency reserve sites could result in speculation with a negative effect on land use, such as productive land not being cultivated. It is probably a good thing for the environment that land is left fallow, but then if species colonise it and it is subsequently developed there is no long term gain for the environment.

Q9 Councils should themselves build more, especially social housing as this is a major segment of need

Q10 Land supply levels should act as triggers for reserve sites provided they are regularly reported

Policies and powers are needed to ensure that reserve sites come forward if needed if they are in private ownership.

Sequential policy is needed to ensure allocated sites are developed before reserve sites

## Review of the Settlement Hierarchy

### General points

- The proposed bands are too wide, equating settlements of very significantly different size and character. *For example Core Villages – Thurston and Lavenham compared with Badwell Ash and Old Newton.*
- The settlement hierarchy factors (available online *at* <http://www.midsuffolk.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/BMSDC-Topic-Paper-Settlement-Hierarchy-Review.pdf>) should be weighted to reflect settlement population in addition. (See also RG2)
- There seems some confusion about parishes v settlements.

### Comment

We support the view that development needs to be accommodated in settlements where the need to travel can be reduced through good access to facilities. People will always want to travel so there should be much more emphasis on travel with low environmental impact, such as safe walking, cycling, and public transport.

The next paragraph says that the existing urban areas have services and facilities that support sustainable development, **however**, the impact on existing infrastructure could well make existing centres unsustainable, *for*

*example levels of traffic on existing Needham Market to Great Blakenham road make it highly unlikely that people will choose to make short journeys sustainably, such as cycling to Needham Market railway station to commute.* To maintain and enhance the sustainable access to existing services and facilities a proactive approach to develop infrastructure that supports genuinely sustainable travel is needed. New developments within 2-3 miles of towns and core villages areas need to be accompanied by measures to making safe walking and cycling connections so that there is no dependence on the motor car. This will also enhance health and wellbeing.

SET2 Support with reservations (see below)

Settlement population and some other factors (see Q11 below) need to be taken into account beyond SET2

Q11 The data used have too many errors. Presence of a GP surgery or school does not necessarily mean there are places. Without places it would go from 2 to 0. Libraries should be included and rated 2 as these are often essential for lower income residents. For cultural and leisure aspects maybe substantial elements such as cinema, theatre, arts centre, rugby ground, football ground, major event location could equal 2.

There should be a greater focus on overall sustainability.

Weighting looks like a good idea providing it also takes into account how long it takes to get to a centre with higher order services and the impact on infrastructure e.g. getting into Ipswich by car or bus from the outskirts is slower than catching a train there from Needham and Stowmarket and then requires parking spaces for those people. Weighting should differentiate towns and villages with safe access to good public transport as there is a significant difference between the villages with only daytime buses and dangerous roads and towns and villages with buses that included evenings and Sundays or are within safe walking/cycling distance of a train station. *For example Woolpit is limiting for people due to A14 junction but Bures St Mary is very accessible for those who do not drive.*

Q12 The proposed hierarchy should be listed separately for each District. Narrower bands taking more criteria into consideration as discussed above. The hierarchy should then be weighted by population and households.

## Spatial Distribution

Each of the proposed distribution options is the same for ‘hamlets and countryside’, 5%, or 22 houses per year of the 452. With approximately 28 of these settlements this would average out at around one house per year for these settlements. This is probably the level of growth residents would be comfortable with. Interestingly, with there being nearly twice as many hinterland villages, about 50, in the distributions where these take 10%, or even 15% of the growth, this would again equate to about one house per year per settlement. The implication of this is that the distinction between hinterland village and hamlet and countryside may not be helpful. Indeed in option MHD4 new settlement focussed if 50 hinterland and 28 hamlet and countryside settlements each take 5% of the growth, there is proportionally more growth in the hamlets and countryside.

The transport corridor focussed option 3 puts a high load on core villages, about 7 houses a year on average, and also Eye, Needham and Stowmarket, with 158 houses per year spread between them.

There is a difficulty with option 3 as there is no actual identification of the ‘transport corridor communities’, and it would only work if there is an integrated public transport network – ie buses which connect with trains and trains that enable people to get to market towns for work/school etc – which we don’t currently get.

The definition of ‘transport corridors’ should include A140 and the rail service to Diss, which should be improved with loops and 2 halts reinstated at Finningham and Mellis.

Q13/14 + MHD 1-4 The options need reconsideration in light of comments above.

Q15 We are opposed to a new settlement

MHD3 We support this option taking into account the above comments.

## Housing Types & Affordable Housing

There is a need for control over the proportions of different sized market homes *for example requiring some 2-bed homes in every development of 10+.*

The increased households in private rented accommodation is probably not by choice. There must be a clear target for homes available for social rent.

## Joint Local Plan – Consultation Draft – Green Group Response

For genuine affordability, low energy use within housing needs considering including affording to be able to live in the home in terms of low energy use and therefore low bills.

Specialist accommodation - There is a stated need for sheltered, extra sheltered and extra care units, but it is hard to see how this fits with MSDC recent decommissioning of sheltered housing.

Policy is needed to ensure low energy needs and CO2 emissions

HM2 and HM3 are supported not HM1

Q16 Yes NDSS minimum space standards apart from self-build. However this policy should improve on minimum standards to ensure buildings are suitable for lifetime homes.

Q17 Self build is supported and will need greater assistance to become more popular. Suitable small areas should be allocated within larger sites, and community land trusts promoted to retain such sites in this unique tenure, adding to diversity. Policy should encourage innovation and excellence. Matching of single sites as proposed should also continue.

Q18. On strategic sites, 5% of new homes should be starter homes.

Q19 More property should be built to the Lifetime Homes standard. The Council should set higher eco-standards ensuring all properties optimise renewable energy, water-saving initiatives, solar gain and sustainable living measures such as storage for bicycles.

Q20 Sheltered housing for particular needs, such as dementia, physical disability, Autism. Projections of need for these groups should be applied.

Q21 Housing Associations should be encouraged to include property at market rents as well as affordable.

Q22 Keep 35% although expect there will be pressure downwards on this if meeting 22% when expectation is we need 17.5%. Smaller sites are more able to argue viability so may need lower % to avoid affordable housing being distributed disproportionately in larger developments and in larger settlements, removing choice, and narrowing social mix in more rural areas.

Q23. Affordable housing should be high priority; CIL (or specific grants or funding from County and District council tax) should provide infrastructure.

Q24. There should be no priority for key workers. They may have more options than the 'just managing' families.

Q25+ RE2 - The size of development should be appropriate for the size of the settlement. Where required, for reasons of viability, there could be 25% max market housing where 'affordable' rentals are provided, and maximum 50% to fund 'Social rents.'

## Rural growth and development

The approach outlined merely extrapolates the current trends, and should instead anticipate the likely changing determinants over the next 20 years.

All options should be considered in relation to truly sustainable development which includes being able to live without total reliance on owning a car. The more flexible approach is RG2 and HG2 although option RG2 risks too much unsustainable development. The phrase 'would not consolidate settlements' needs explanation. A policy is needed to deliver advanced structural landscaping on allocations and to ensure the care of allocated sites awaiting development, particularly for biodiversity.

Q26 – RG2 but with limits on size of development.

Q27 – Need to consider numbers of housing in relation to size of settlement and set a limit for rural areas.

Q28 – There is some ambiguity between HG2 and RG2

## Accommodation Needs of Gypsies and Travellers

## Joint Local Plan – Consultation Draft – Green Group Response

Regular caravan counts are needed to assess need

Support GT1 not GT2

Support TS1

Support EGT1 but The Forge travellers' site (Combs Lane, Great Finborough) should be retained as part of specialist provision and action is needed to increase Gypsy and Traveller use

Q29 – Unauthorised encampments should be considered as they arise, and tolerated for a limited period or moved on case by case basis. Not support “negotiated stopping places”

## Economic Needs

There are so many under-occupied employment sites currently – and policy is needed to encourage new business growth on existing sites. Unemployment rate 4.3% so only rising population that is fuelling business growth.

Support ECON1 until specific needs become apparent.

Q33 Yes

Q34 & Q35 Existing employment uses should be protected, and change permitted where justified on a case by case basis.

Q36 Non-B class areas should not be specifically identified; rather there should be a policy setting out the sort of area where they might be acceptable, and consider each application on its own merits.

Q37 Yes for appropriate support businesses (eg childcare) but would depend on the class B use. For instance, childcare next to office development is appropriate but not next to heavy manufacturing or warehousing with few employees it is not. Protection of town centre retail should be paramount.

Q38 No as plenty already allocated

Q39 Yes by Council developing small business units and requiring 35% small units on large employment allocations.

Q40 don't need more at present

Q41 Council could provide sites with services already installed, and serviced business centres.

## Town Centres and Retail

Q41 A more creative approach is needed to helping people start up their own business. Small businesses in villages are vital to their sustainability.

Q42 The frontage of the redundant council office in Needham should be included in the Principal Shopping Area.

Q43 Consider **non-town** sites that may be good for commercial leisure use such as Thurston or Elmswell. This would improve access to the public..

OC1 Support

TC1 Support

PS1 Support

RIA2 Support

Q45 Not entirely see Q42

Q47 - With increasing use of online shopping, out of town centres should be restricted and town centres supported to increase use by those with access needs and to revitalise town centres to make attractive places to live.

Q49 Even 400 sqm may be too high a threshold

## Biodiversity

See strengthened Environmental Issues section above, especially unprecedented extinction event.

The strategic priority is to **protect and enhance**, especially in creating corridors and linkage between and outside areas with designations.

Evidence should include the tree cover survey of Suffolk, and regular monitoring.

Policy is needed to ensure tree planting on an increasing scale, for landscape, climate change and health reasons, as well as strengthening biodiversity.

10/11/2017

Q51 Support Option BIO 2 - must always protect **and** enhance.

## Climate Change

### Some general comments on the Strategic Priority:

The National Planning Policy Framework insists on a “presumption in favour of sustainable development” but leaves it to councils to refine their interpretation of sustainable development.

We suggest BMSDC define sustainable development as “Development that supports the transition to a zero carbon economy.” The need for policies to address climate change, both mitigation and adaptation, should run like a green thread throughout Local Plan policies. For buildings, policy should require minimum standards to be exceeded as the structures will typically be in use for the next 60 years at least. This should include building orientation and design and site layout. Enhanced energy efficiency and CO2 standards should be proposed. The necessary level of improvement will require councils to be freed of Government direction against energy efficiency requirements exceeding former Level 4. Until this is allowed policy should be flexibly aimed at the highest standards permitted.

The evidence base should include estimates of the carbon footprint of each District, as previously reported:

National Indicator 185 (NI 185) “Percentage carbon dioxide reduction from Local Authority operations”

<https://www.gov.uk/guidance/sharing-information-on-greenhouse-gas-emissions-from-local-authority-own-estate-and-operations-previously-ni-185>

National Indicator 186 (NI 186) “Per capita carbon emissions in local authority area”

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/623015/2005\\_to\\_2015\\_UK\\_local\\_and\\_regional\\_CO2\\_emissions\\_statistical\\_release.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623015/2005_to_2015_UK_local_and_regional_CO2_emissions_statistical_release.pdf)

FR1 Support

RE2 Support

Q52- renewable energy should be at the heart of development – especially solar PV on new housing. We suggest that BMSDC should define impacts of renewable technologies as follows “BMSDC seeks to prevent unacceptable adverse impacts of renewable energy projects to designated wildlife sites (e.g. SSSI’s, National Nature Reserves), species afforded legal protection, Scheduled Ancient Monuments and Grade I and II\* listed buildings”.

Biodiversity should be a major factor in determining approval for renewable projects. Solar farms should comply with BRE/RSPB recommended standards for biodiversity

<http://www.bre.co.uk/filelibrary/nsc/Documents%20Library/NSC%20Publications/National-Solar-Centre---Biodiversity-Guidance-for-Solar-Developments--2014-.pdf>

and weight be given to whether they would improve biodiversity or reduce it. Given that most intensively farmed land is heavily sprayed, solar farms built on this land would improve biodiversity with the right ecological management plan.

This policy closely supports the two council's preferred Biodiversity option BIO 2 – whereby new areas of biodiversity are created rather than just retaining existing ones.

Q53 Support but include rainwater and grey water usage and aim for 110 litres a day which is already a standard adopted by the well-regarded London Plan.

Q54 Sustainable construction must be integral to policy – we should be going far, far further than proposed to mitigate climate change, contributing to achievement of a 1.5°C maximum increase in global temperatures. Specifics:

**Travel** new developments within 2-3 miles of village hubs or urban areas need to contribute to making safe walking and cycling connections to that there is no dependence on the motor car.

### Renewable Energy and Sustainable Construction

The councils should require energy efficiency standards for new build should meet level 4 of the former Code for Sustainable Homes (a 19% improvement on 2013 building regs).

Explanation: In a bid to cut “red tape” the Government has removed the ability for councils to require zero carbon homes. However, the above requirement is still allowed under national legislation and the Government has so far failed to ban it, even though it has said it will. Given rising domestic and business heating costs, the need to cut

carbon emissions and mitigate climate crisis, it would be a mistake for local authorities like Babergh and Mid Suffolk to fail to use this opportunity to push for better insulation for new homes. Not only does it reduce carbon emissions but it will make energy bills more affordable for hundreds of Suffolk families. In practice it will either mean developers have to better insulate homes or install renewable technologies such as solar PV panels, solar water heaters, wood burning stoves or heat pumps.

### **Carbon offset requirements**

Babergh and Mid Suffolk should include a requirement in the local plan for 15% offset of total CO2 emissions (including unregulated energy) using Low and/or Zero Carbon Technologies. This is still allowable even though the Government has scrapped its Zero Carbon research unit.

### **Encouragement for Passive House and Home Quality Mark**

The fact that passive house standards have been barred as a requirement from local plans by central government should not stop Babergh and Mid Suffolk encouraging such standards. We urge the council to include the words “Where deemed feasible developments are actively encouraged to pursue accreditation with the Home Quality Mark or Passivhaus standard.”

Also the council should require any buildings constructed on Council land to be built to Passive House standards. A covenant should be imposed on any land sold by the council for development that it must be built to Passive House standard. There is already precedent for this in Kirklees Council, in West Yorkshire

When building its own council houses, the council should build them to Passivhaus standard

### **Commercial developments**

- Babergh and Mid Suffolk should require commercial developments to achieve a 40% improvement over the 2010 building regulations, as the London Plan currently does. The London Plan is considered best practice by planners concerned with sustainability. In practice this will mean combined heat and power units, PV panels, vastly improved insulation or a combination of all three.

- Applications for commercial (non-residential) developments should be required to meet the BREEAM “Excellent” standard which is currently considered achievable best practice.

### **General sustainability and ecological requirements**

- Developers should be required to comply with a sustainability check list, provided with their application, including: the Considerate Constructors Scheme, Cycle Storage standards, minimum daylighting standards, ecological mitigation and enhancement, environmental impact of materials, low energy external lighting, flood risk assessments and site waste management plans. This can be checked during construction with the help of Building Control Officers, to lighten the burden on planning officers. Richmond upon Thames council has used such checklists successfully for many years.

- The two councils ought to require Sustainable Urban Drainage Systems for all new developments over 5 dwellings

- Bird Bricks should be conditioned in all new dwellings.

Ecological requirements ought to include: tree/hedge planting, green roofs, native plant species, nectar producing plant species (for pollinating insects), avoiding peat compost, provision of bird bricks & bat boxes, provision of log piles and gaps in fences for hedgehog habitat.

## **Landscape, Heritage & Design**

Support Option L1 and combine L2 with it.

The 2015 Landscape Guidance seems to be a good document but is not being used at Development Management level and must be upheld in most circumstances, not just “wherever possible.” There is a need for consistency with the Open Space section. Opportunities should be taken to enhance Landscape, not merely protect.

Q60 Design must refer to embodied energy and resource efficiency, using orientation to achieve low demand and low annual carbon footprint .

The lessons of pilot exemplar projects such as Clayfields, Elmswell are not being applied. We should also look to other councils for examples of best practice policies.

HA1 Support

## Infrastructure

There must be a strategic approach, whereas the draft merely extrapolates the current one. Discussion shows little sign of anticipating the trend to a low carbon future. There are implications of electric, communal, driverless vehicles. Provision needs to meet health needs such as for exercise and open spaces. An infrastructure of green corridors is needed, comprising more than just the river courses.

Infrastructure should promote walking /cycling and easy access to services.

Energy infrastructure should be moving to local networks which will strength resilience

Q63-68 are poorly framed – see comments above

## Healthy Communities

Support OS2, NROS2 and POS2 and CF2

There is a need for Open Space policy to be consistent with Landscape policy.

Concern that a robust evidence base is not yet available

Tree cover for Mid Suffolk and Babergh should be monitored every five years (Ipswich Borough Council have carried out this work) and if percentage of tree cover decreases then landscaping conditions on all new development proposals will be expected help redress the shortfall. (*Woodland Trust – Space for people May 2017*)

Q70 Not sure that Mid Suffolk has a deprivation issue that needs specific provision here.

## Clusters / Boundaries / Land for Development

Q74 Support the approach of identifying clusters, but its implementation needs revision in practice and should be regularly revised.

Do new boundaries mean development may not be allowed if no infill sites are available? (especially in hamlets or hinterland villages)?

Q78 There is a need to map the proposed settlement boundaries, excluding parts of land bids not suitable for development. Sites previously refused permission during the lifetime of NPPF should not be included as potential allocations. A revised SHELAA is needed.

Q79 Where is the brownfield land register which is required by [\*The Town and Country Planning \(Brownfield Land Register\) Regulations 2017\*](#)