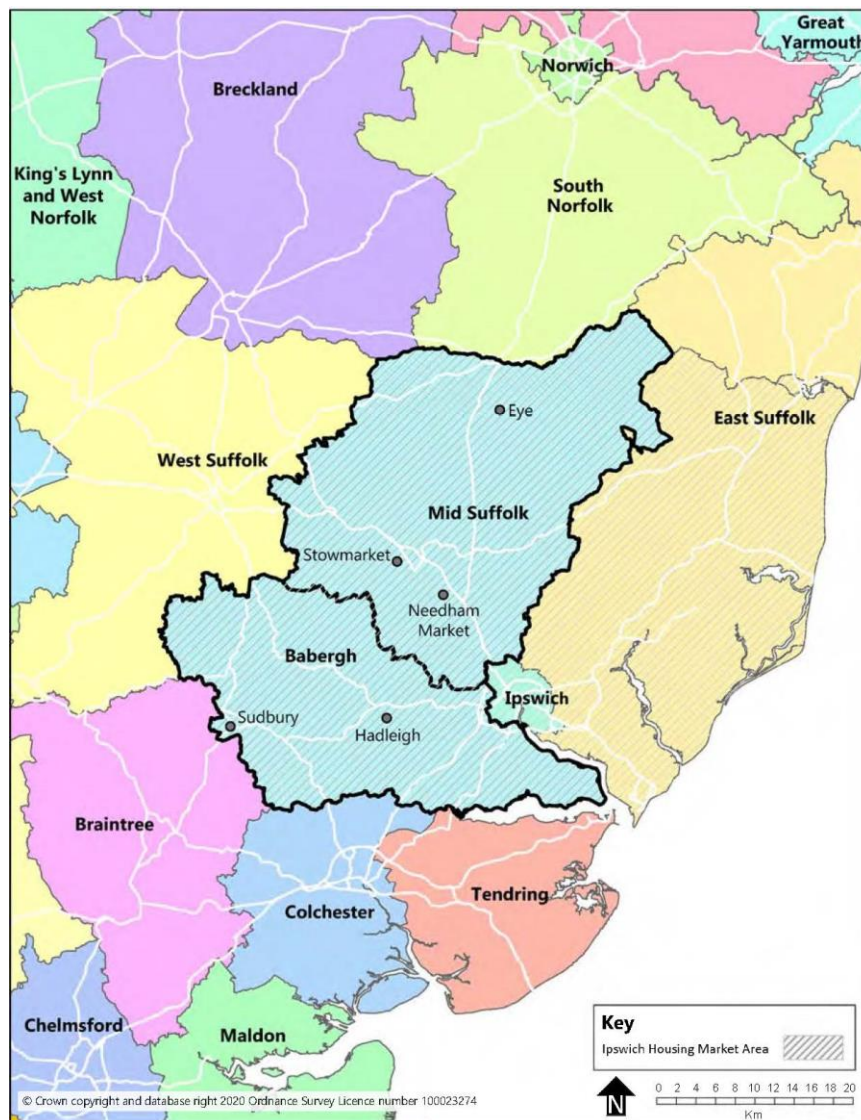


**Babergh and Mid Suffolk Joint Local Plan
Statement of Common Ground
Between
Babergh and Mid Suffolk District Councils
and
Suffolk County Council**

March 2021

1. Areas covered by the Statement of Common Ground

The Statement of Common Ground relates to the area covered by the local planning authorities of Babergh District Council and Mid Suffolk District Council.



2. Signatories to this Statement of Common Ground

The signatories to this Statement of Common Ground are:

- Babergh District Council,
- Mid Suffolk District Council, and
- Suffolk County Council.

3. Purpose and Scope of Statement of Common Ground

Local planning authorities have a statutory duty to co-operate with specified bodies in relation to strategic planning matters. Suffolk County Council is a prescribed body subject to the duty to co-operate as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 and are required to be involved in the plan-making process.

Responses were made by Suffolk County Council (SCC) to the consultation on the Babergh and Mid Suffolk Joint Local Plan Preferred Options document (July 2019) dated 30th September 2019. The comments made were taken into account in the preparation of the Babergh and Mid Suffolk Joint Local Plan Pre-Submission (Regulation 19) Document (November 2020), and Babergh and Mid Suffolk District Councils sought to address the concerns raised as detailed in the interim Statement of Common Ground (October 2020) (Core Document Library reference ES02).

There has been extensive ongoing engagement between Babergh and Mid Suffolk District Councils and Suffolk County Council throughout the preparation of the Joint Local Plan (JLP). This statement sets out a position to confirm that Babergh and Mid Suffolk District Councils are continuing to work collaboratively with Suffolk County Council and have agreed a way forward to the consideration of the responses made to the Regulation 19 consultation.

Please note: this Statement of Common Ground excludes transport matters, which are dealt with under the Statement of Common Ground (SoCG) with SCC and Highways England, and promotion of land in the County Council's ownership.

4. Matters raised

The nature of SCC's response to the JLP Pre-Submission (Regulation 19) Document (November 2020) are summarised below.

- Early Years Strategy

A review of the Early Year Strategy will provide further evidential details which will feed into the next iteration of the Infrastructure Delivery Plan (IDP).

- Allocation of Land for Primary School

SCC have raised a request for further land allocations to enable additional education provision. This land is identified in the IDP, however SCC request it is referenced directly in the JLP through site allocations policies in Bacton, Bentley, Hintlesham, and Laxfield. SCC also request a change to the policy wording of site allocation LA078 – Land South of Stowmarket Road, Stowupland, to include reference to pre-school provision that is separate from school provision.

- Archaeology

SCC consider that to be consistent with paragraph 185 of the National Planning Policy Framework, it is necessary to add additional wording to site allocation policies in Bramford, Eye, Shotley and Sproughton as shown in Appendix 2.

- Flood Risk

SCC consider the policy wording for policy LP29 – Flood risk and vulnerability requires further wording, as shown in Appendix 3, to be clear that mitigation is provided against existing and potential flood risks throughout the life of the development. In the explanatory text, SCC consider it would be helpful to add reference to surface water management plans or other studies where they have taken place.

SCC also consider that the site allocation LA042 – Land at Tye Farm, Great Cornard should take into account that it falls within the Sudbury and Great Cornard Surface Water Management Plan's (SWMP) Critical Drainage Areas and that additional text is added to the policy including that a Flood Risk Assessment (FRA) should be carried out.

SCC also consider a number of site allocations should include a requirement for a Flood Risk Assessment to be effective and have suggested some different wording as shown in Appendix 4 along with the list of sites.

- Disposal of Education Land

SCC considers that wording related to the disposal of school land in policy LP34 is unnecessary as there is already a robust legislative process for the disposal and redevelopment of surplus school facilities.

5. Funding of projects and delivery

The funding mechanisms referred to in the Infrastructure Delivery Plan (Appendix 1 below) use cost multipliers which are provided by the infrastructure providers, such as SCC in terms of education, libraries and waste, and the health providers for health provision. Most cost multipliers are reviewed annually to take account of inflation and other legislative or government practice or local Guidance / advice. Therefore, it is important to acknowledge that the cost estimations based on cost multiplier may change over time and because when projects are finally designed and costed out, unforeseen cost may present themselves.

Infrastructure projects particularly those which are outside of the Districts' geographical boundaries but where growth within our Districts contribute to the need for this infrastructure require effective collaboration between all the parties concerned. This may involve infrastructure providers and local Parishes but will also involve working with other local authorities. In order to deliver these projects both Districts would be seeking to resolve how the infrastructure can be jointly funded and delivered to timescales which are agreed. The information on these cross-boundary infrastructure projects provide estimates based on the use of current cost multipliers for our own Districts only. These figures cannot be relied on for total project costs or as guarantees that these monies will be forthcoming at these levels as Community Infrastructure Levy (CIL) expenditure (over £10,000) are decisions made by each Districts' Cabinet subject to thorough assessment against the criteria in the CIL Expenditure Framework.

The Infrastructure Delivery Plan sets out infrastructure priorities for each District and has been worked on collaboratively with infrastructure providers to establish the type, nature, estimated cost (using cost multipliers) of infrastructure projects. It will be important, with each infrastructure project, (particularly cross boundary projects) to fully scope and establish the opportunities for other funding sources and mechanisms to address any funding gaps. This will involve effective collaborative work between all the relevant organisations / parties to ensure that the infrastructure is delivered effectively and in a timely manner.

It is also important to note that to access CIL funds for infrastructure projects within Babergh and Mid Suffolk, the infrastructure must be contained within the Councils' Infrastructure Funding Statements (Infrastructure List). CIL bids are determined under the Councils' Expenditure Framework. This requires the submission of Bids in a prescribed format which would then be validated screened (for availability of other funding) before being prioritised (against agreed criteria). The CIL bids will be included in a CIL Expenditure Programme (undertaken at least twice a year) and determined by the relevant Council Cabinet. The agreed prioritisation criteria are set out in the CIL Expenditure Framework (April 2020). Affordability of the infrastructure, and whether there is a need (i.e. critical, essential, or desirable as contained within the Infrastructure Delivery Plan and where appropriate included within other strategies of the Councils), are key components of the CIL expenditure scheme.

Outcomes

It is agreed that all parties will continue to work collaboratively on matters identified in this Statement of Common Ground as the Joint Local Plan progresses to Examination.



Additionally, the parties will also continue to work collaboratively on:


- **Funding mechanisms of Household Waste Recycling Centres (HWRCs) for Stowmarket, Sudbury and Ipswich (Portman's Walk), as the cost of each new facility is approximately in the region of £3-5m (costs variation will be affected by for example decontamination, land value, topography, drainage). It is understood that other SCC funds would be assigned to accompany any potential CIL bid (derived from cost multipliers) such as SCC Capital Budget / Capital asset from existing facilities / SCC borrowing.**
- **Further analysis at Plan review stage for the position on secondary school provision.**

6. Process for reviewing the Statement of Common Ground

This Statement of Common Ground consists of a final position prior to Submission of the Joint Local Plan for Examination, and all parties will continue to work collaboratively.

7. Signatories

<p>Signed on behalf of Babergh District Council</p>  <p>Name: Tom Barker Position: Assistant Director, Sustainable Communities</p>	<p>Date: 26/3/21</p>
<p>Signed on behalf of Mid Suffolk District Council</p>  <p>Name: Tom Barker Position: Assistant Director, Sustainable Communities</p>	<p>Date: 26/3/21</p>

Signed on behalf of Suffolk County Council  Name: James Cutting Position: Head of Planning	Date: 26 March 2021
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APPENDIX 1 – Education Provision and Data from Infrastructure Delivery Plan (September 2020)

SCC have requested a change to the policy wording of site allocation LA078 – Land South of Stowmarket Road, Stowupland, to include reference to pre-school provision that is separate from school provision as shown below:

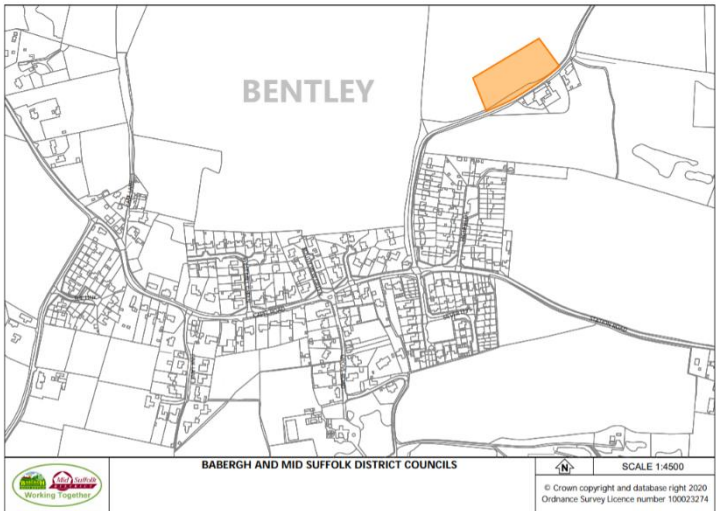
The development shall be expected to comply with the following:...

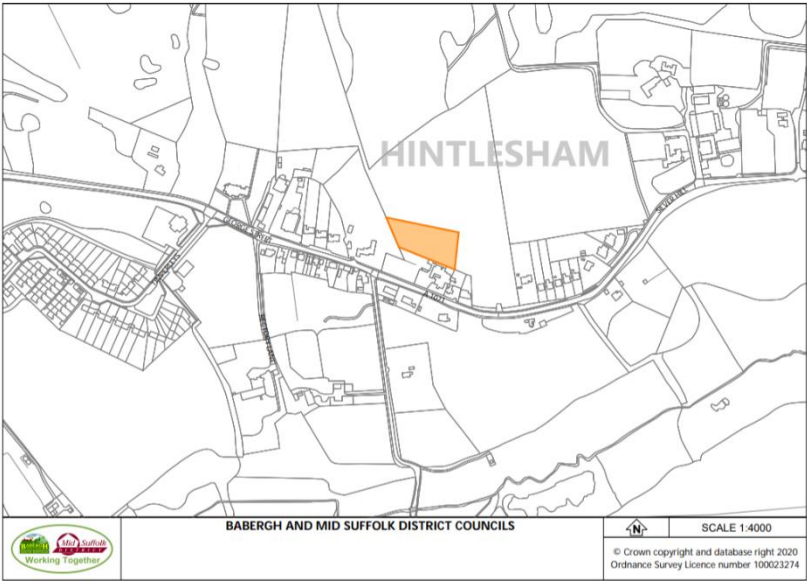
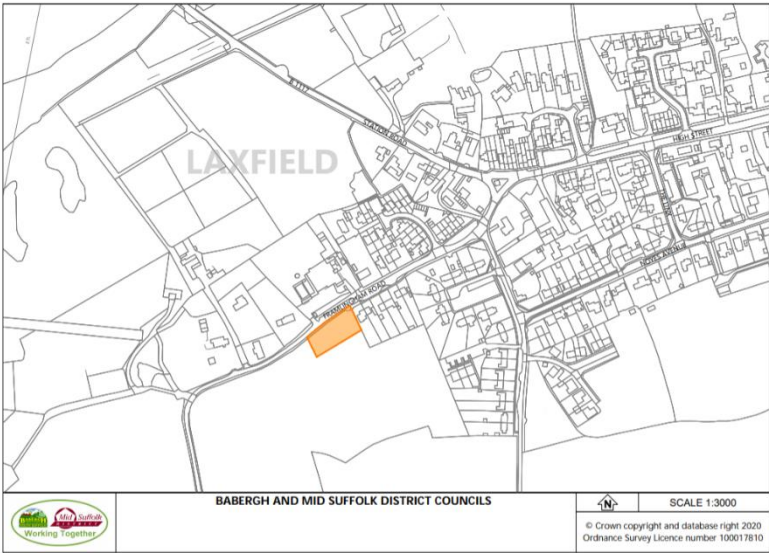
X. A free, serviced site of 0.12ha should be reserved for a pre-school setting;

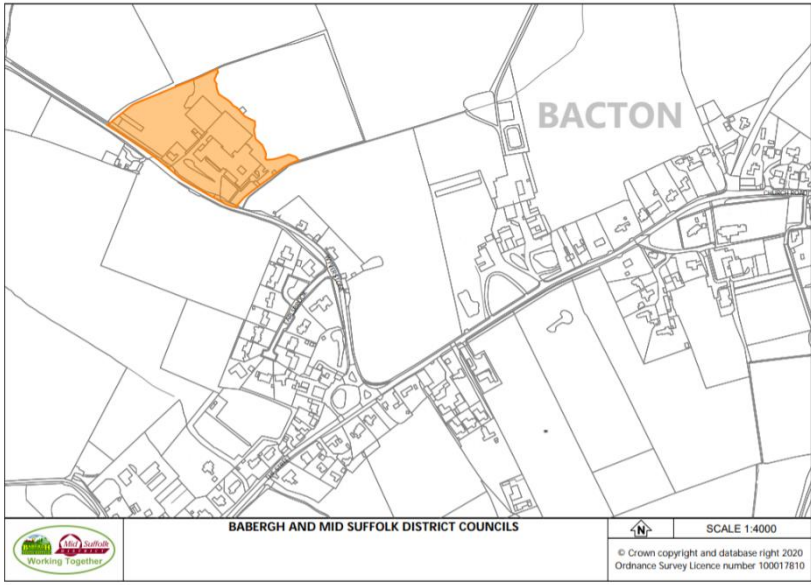
XI. If required at the time of a planning application a free, serviced site of 3ha should be reserved for a new primary school, which should incorporate the required pre-school in part X of this policy...

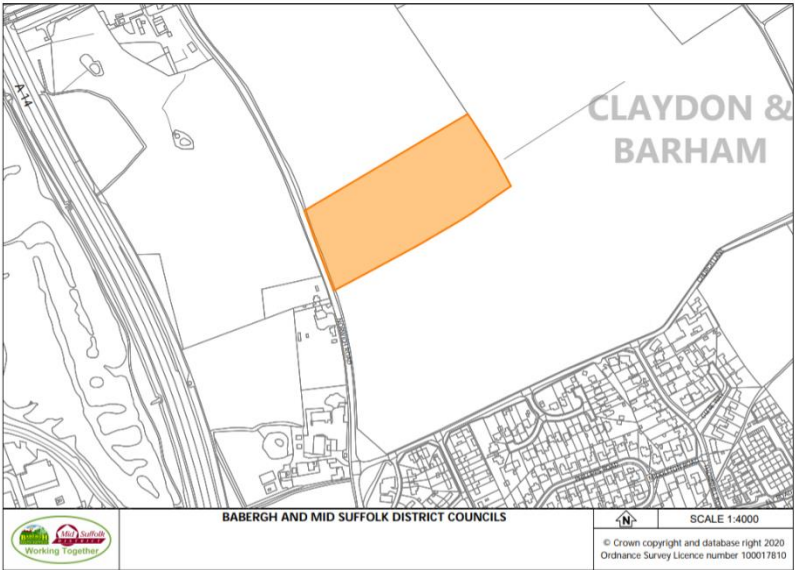
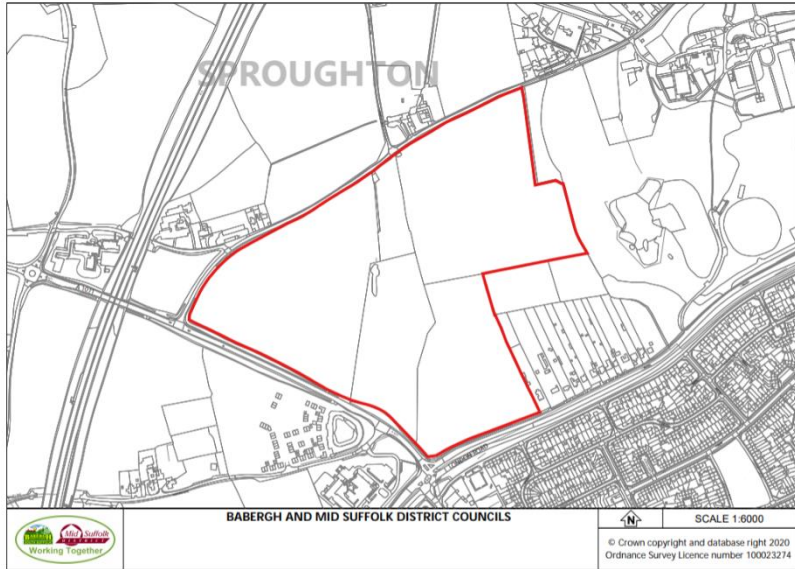
Land needed for expansions of existing schools and provision of new schools (primary and secondary schools)

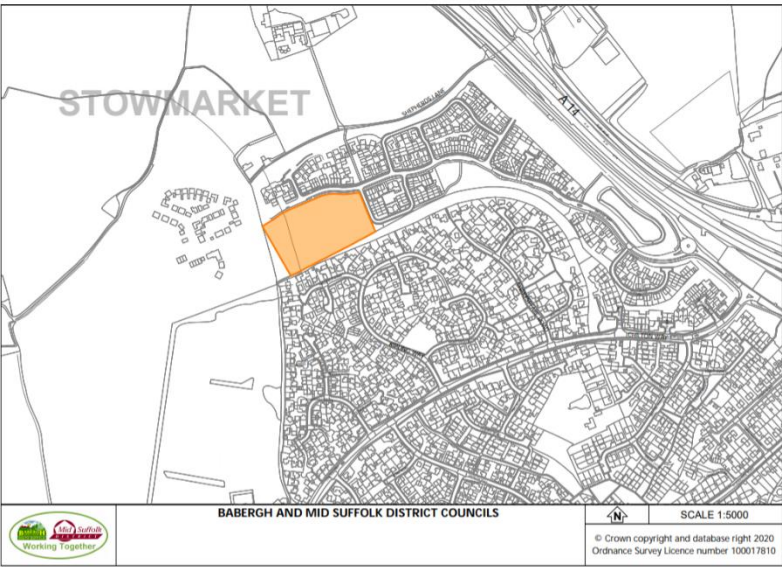
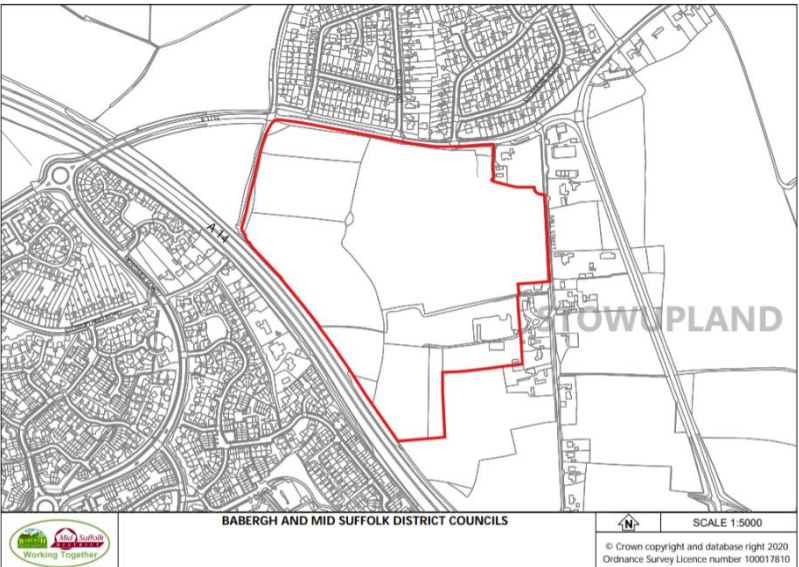
School	Land allocation in ha	Reason for allocation	Estimated timeline for school expansion	Expansion necessary in relation to planned growth	Land Assembly/Evidence of land ownership agreement for use
Land allocations for Primary school expansions					
Bentley – Primary School	1 ha	<p>The County Council does not intend to expand Bentley Primary School beyond 70 places. Expansion beyond 70 places would be challenging, expensive and is not forecast to be necessary for delivery of the Local Plan.</p> <p>However, the school is currently some way distant from its playing fields. Additional land for playing fields on the other side of Church Road would significantly improve the operation of the school and remove the need for pupils to travel to playing fields almost 1km / 0.6 mile away.</p> <p>It would also enable a qualitative/safeguarding improvement as the</p>	Short term (up to 5 years)	In order to meet the requirements of paragraphs 91, 92 and 94 of the NPPF, the Local Plan should allocate land for new playing fields north of Church Road.	The County Council will, in due course, seek to purchase the land from the landowner at Education land use value.

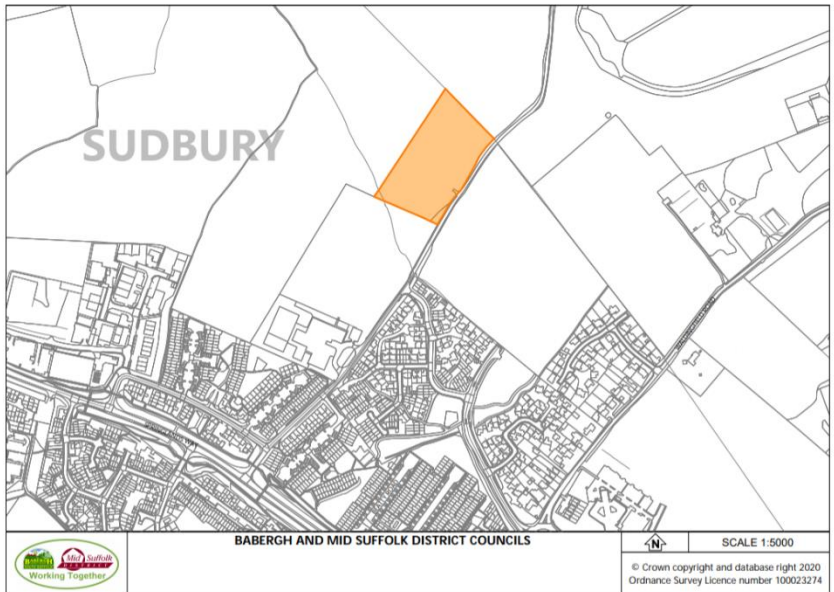
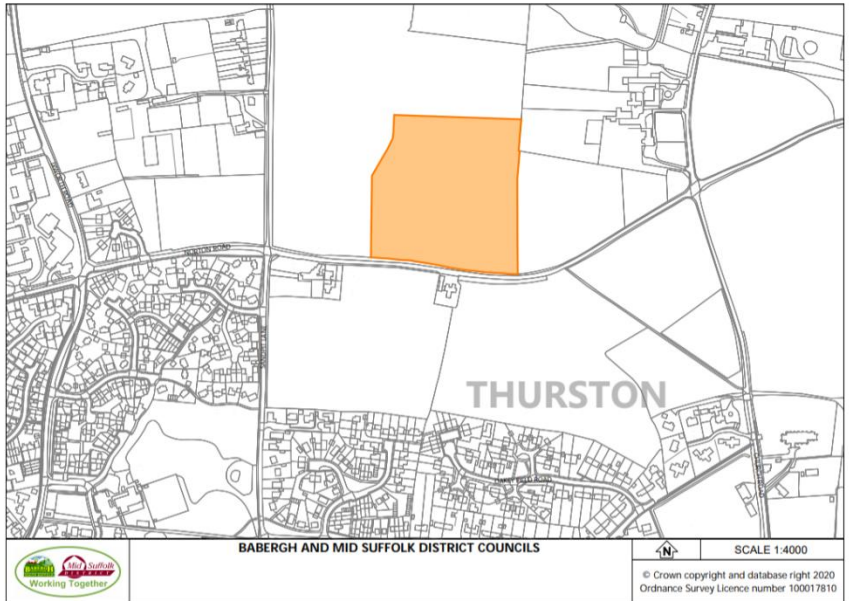
School	Land allocation in ha	Reason for allocation	Estimated timeline for school expansion	Expansion necessary in relation to planned growth	Land Assembly/Evidence of land ownership agreement for use
		school could utilise and supervise the field far more effectively.			
					
Eye -Primary School		It has been confirmed by SCC that St Peter and St Paul Church of England Primary School can expand from 210 to 315 places (Phase 1) within its own site, however for expansion to 420 places (Phase 2) additional land may be required.	Medium term (5 to 10 years)	JLP/NP allocations circa 500 dwellings and committed growth circa 300.	
Hintlesham – Hintlesham & Chattisham Primary School	0.18ha	To enable the school to meet external space standards and enable future remodelling/expansion of the primary school if needed, an area of land to the north of the existing site is needed to prevent land locking.	Medium term (5 to 10 years)	In order to meet the requirements of paragraphs 91, 92 and 94 of the NPPF.	The School provider will, in due course, seek to transfer land from the landowner.

School	Land allocation in ha	Reason for allocation	Estimated timeline for school expansion	Expansion necessary in relation to planned growth	Land Assembly/Evidence of land ownership agreement for use
					
Laxfield – All Saints Primary School	0.06 ha	Land allocation required to facilitate relocating the existing car park to provide for expansion to 140. Expansion of existing school would be constructed on existing car park.	Short term (up to 5 years)	Windfall growth through JLP boundary reviews, no JLP residential site allocations. Committed growth.	Land to be secured through the development of Land to the south of Framlingham Road, Laxfield.
					

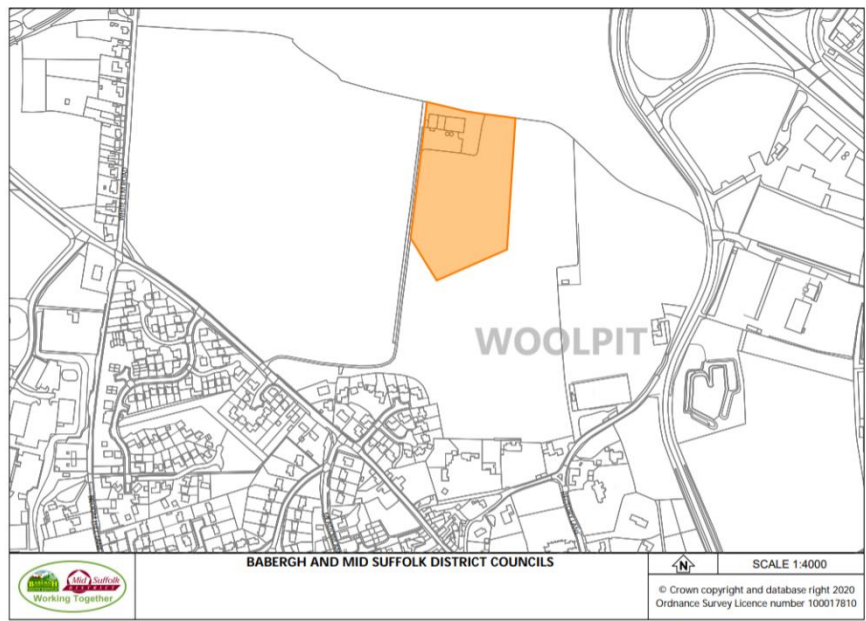
School	Land allocation in ha	Reason for allocation	Estimated timeline for school expansion	Expansion necessary in relation to planned growth	Land Assembly/Evidence of land ownership agreement for use
Land allocations for new Primary schools					
Bacton - New school (relocation) on Middle school land (DC/17/0379 9 / LA046 - 50 home plus new school) - relocation of current primary school.	1.7ha	Land allocation required to facilitate relocating the current primary school.	Short term (up to 5 years)	JLP allocations circa 110 dwellings and committed growth.	Existing use of the land already in education authority control, principle of education use already established.
					
Claydon & Barham - New primary school as part of planning application 1856/17 (Land North West of Church Lane, Barham)	3ha	Site of 3ha of land needed for new primary school on Land North West of Church Lane, Barham.	Short term (up to 5 years)	JLP allocations and committed growth.	Land to be secured as part of policy LA002 and through Section 106 agreement once planning permission granted.

School	Land allocation in ha	Reason for allocation	Estimated timeline for school expansion	Expansion necessary in relation to planned growth	Land Assembly/Evidence of land ownership agreement for use
					
Sproughton – Wolsey Grange Primary	3ha	Site of 3ha of land needed for new primary school on Wolsey Grange 2 - (land north of A1071). A site 3ha would future proof the new school to 630 places and would accommodate an Early Years setting for 60 places. A second site of 0.1ha is needed for a second Early Years setting of 60 places.	Short to medium term (up to 10 years)	JLP allocations circa 1000 dwellings and committed growth circa 700.	Land to be secured as part of policy LA013 and through Section 106 agreement as part of planning permission.
					
Stowmarket - New Chilton Leys Primary School	1.6ha	1.6ha allocation as part of Planning Permission 5007/16.	Short term (up to 5 years)	JLP allocations circa 700 dwellings and committed growth circa 900.	SCC – land secured through Section 106 agreement as part of planning permission.

School	Land allocation in ha	Reason for allocation	Estimated timeline for school expansion	Expansion necessary in relation to planned growth	Land Assembly/Evidence of land ownership agreement for use
					
Stowupland – Potential new primary school	3ha	Site of 3ha of land needed for a potential new primary school on land South of Stowmarket Road, Stowupland, Policy LA078. This allocation would provide for the new education provision needed for the area if the existing primary school (Freeman) is unable to expand.	Medium to long term (up to 10 years or more)	JLP allocations circa 400 dwellings and committed growth circa 400.	SCC as education authority would be looking to secure the land.
					
Sudbury - New Chilton Woods Primary School (includes new pre-school)	2.3ha	2.3ha allocation as part of Planning Permission B/15/01718, Chilton Woods Mixed Use Development Land North Of Woodhall Business Park, Sudbury	Medium term (up to 10 years)	JLP allocations circa 500 dwellings and committed growth circa 1150.	SCC – land secured through Section 106 agreement as part of planning permission.

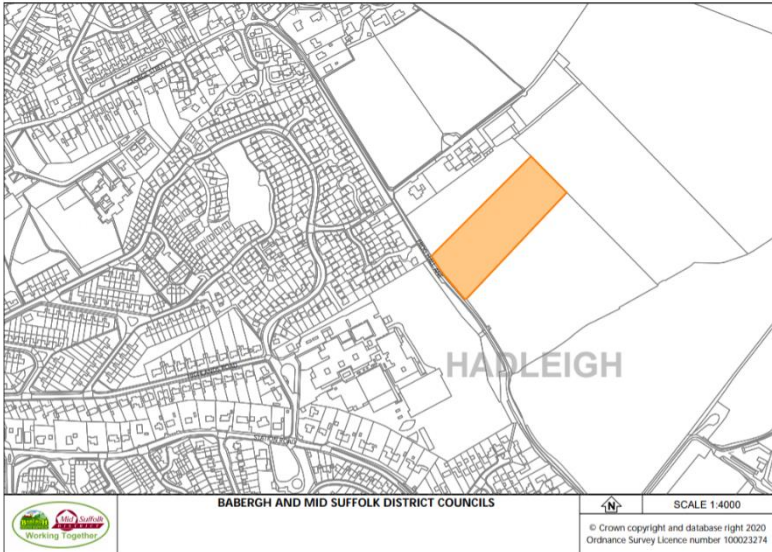
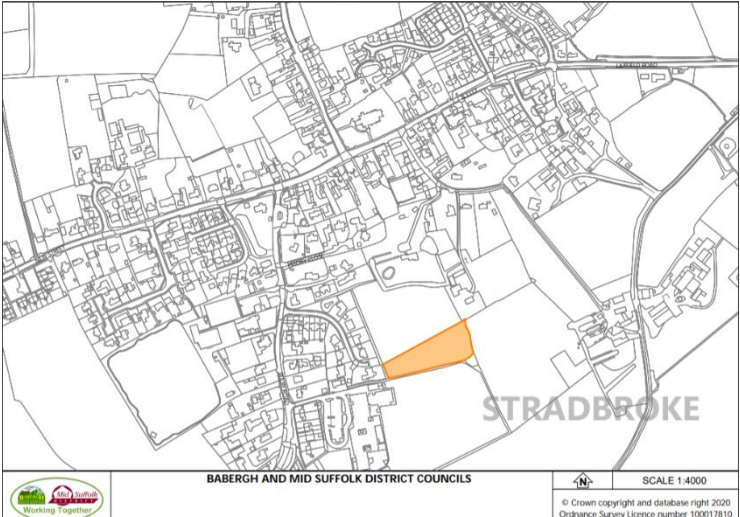
School	Land allocation in ha	Reason for allocation	Estimated timeline for school expansion	Expansion necessary in relation to planned growth	Land Assembly/Evidence of land ownership agreement for use
					
Thurston – New School in Thurston (includes pre-school of 30 places)	3ha	<p>Site of 3ha of land needed for the relocation and expansion of Thurston Church of England Primary Academy. The land for the primary school is being provided as part of a housing development at land north of Norton Road (5070/16)</p> <p>The new school will provide 420 places, which includes the relocation of the existing 210 place primary school. To be built for September 2021.</p>	Short term (up to 5 years)	JLP allocations circa 500 dwellings and committed growth circa 900.	SCC – land secured through Section 106 agreement as part of planning permission.
					

School	Land allocation in ha	Reason for allocation	Estimated timeline for school expansion	Expansion necessary in relation to planned growth	Land Assembly/Evidence of land ownership agreement for use
Woolpit - new primary to supply growth of Elmswell and Woolpit	3ha	Site of 3ha of land needed for new primary school on Land Off Bury Road The Street Woolpit (Policy LA095), under planning application DC/18/04247).	Short term (up to 5 years)	JLP allocations and committed growth.	SCC – land secured through Section106 agreement as part of planning permission.



Land allocations for Secondary school expansions

Hadleigh - Secondary School	1.2 ha	Site of 1.2ha of land needed for secondary school expansion from 840 to 1200, on land north east of Frog Hall Lane, Policy LA028. In accordance with new NPPF para 94 and DfE guidance of April 2019, need to protect the ability to expand.	Short to medium term (up to 10 years)	JLP allocations circa 550 dwellings, committed growth circa 100 dwellings, pending decision on 172 dwellings.	SCC as education authority will be looking to secure the land.
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School	Land allocation in ha	Reason for allocation	Estimated timeline for school expansion	Expansion necessary in relation to planned growth	Land Assembly/Evidence of land ownership agreement for use
					
Stradbroke - High School	0.5ha	0.5 hectares of the southern part of Land to the east of Farriers Close (policy LA083 and STRAD/16 of the Stradbroke Neighbourhood Plan)	Medium to long term (up to 10 years or more)	Allows for possible extension of the playing field (in accordance with the Neighbourhood Plan)	Policy LA083 and STRAD 16 of the Stradbroke Neighbourhood Plan. SCC as education authority will be looking to secure the land.
					

Appendix 2 – Suffolk County Council proposed changes to archaeology policies

Site Allocation LA006 in Bramford

Measures for managing impacts on archaeological remains are provided, including archaeological excavation

Site Allocation LA007 in Bramford

Measures for managing impacts on archaeological remains are provided, including preservation in situ of the known double ring ditch, and archaeological excavation

Site Allocation LA075 In Shotley

An archaeological assessment and measures for managing impacts on archaeological remains are provided.

Site Allocation LA099 in Eye

An archaeological assessment and measures for managing impacts on archaeological remains are provided

Site Allocation LA116 Sproughton

Measures for managing impacts on archaeological remains are provided, including archaeological excavation

Appendix 3 – Suffolk County Council proposed changes to flood risk policies

Policy LP29 Flood Risk and Vulnerability

3. Mitigation is provided against existing and potential flood risks throughout the life of the development (including fluvial, surface, coastal and sewer flooding) through application of a sequential approach to flood risk, the implementation of Sustainable Drainage Systems (SuDS), and avoiding or mitigating risks to ground or surface water quality

Appendix 4 – Site Specific Flood Risk Comments

Suffolk County Council state the following proposed change should be included in the list of site allocation policies below.

A flood risk assessment should be carried out to identify suitable mitigation and a deliverable strategy for the disposal of surface water. Where possible development should avoid proportions of the site with predicted or historic flooding.

LA001	LA031	LA081
LA002	LA032	LA085
LA006	LA036	LA086
LA007	LA037	LA087
LA008	LA040	LA089
LA009	LA045	LA095
LA010	LA056	LA096
LA013	LA064	LA097
LA016	LA065	LA104
LA020	LA075	LA118
LA028	LA076	