

Mid Suffolk District Council



Eye Neighbourhood Development Plan

Submission Consultation Responses

In May 2019 Eye Town Council (the 'qualifying body') submitted their Neighbourhood Development Plan to Mid Suffolk District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Wednesday 22 May 2019 until Friday 5 July 2019. Twenty-three organisations / individuals submitted representations. These are listed below, and copies are attached.

Ref No.	Consultee
E-1	Suffolk County Council
E-2	Ingleton Wood (obo MSDC) THIS REP HAS BEEN WITHDRAWN
E-3	Mid Suffolk District Council (Planning Policy)
E-4	Environment Agency
E-5	Historic England
E-6	Natural England
E-7	Anglian Water
E-8	Highways England
E-9	UK Power Networks
E-10	National Grid
E-11	Ipswich & East Suffolk Clinical Commissioning Group
E-12	NHS Property Services Ltd
E-13	All Saints Schools Trust
E-14	Suffolk Preservation Society
E-15	AAH Planning Solutions
E-16	CPO Solutions (obo Warren Hill Farms)
E-17	Pegasus Planning (obo Amber REI)
E-18	Pegasus Planning (obo TW Baldwin)
E-19	TW Gaze (obo client)
E-20	490 th Bomb Group Eye Airfield Heritage Group
E-21	Bailey (Resident)
E-22	Hazlewood (Resident)
E-23	Smith (Resident)

(E-1) Suffolk County Council

Date: 5th June 2014
Enquiries to: Cameron Clow
Tel: 01473 260171
Email: cameron.clow@suffolk.gov.uk



Dear Robert Hobbs,

Submission version of the Eye Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the submission version of the Eye Neighbourhood Plan.

Suffolk County Council is supportive of the Town Council's vision for the area and welcomes the engagement undertaken by the Town Council and the attention paid to comments made by SCC in the previous consultation. In this letter we aim to make comments in relation to the Basic Conditions required of neighbourhood plans to proceed to referendum.

Early Years Education

It is noted that the plan recognises the potential need to include an early years setting independently of the new school site in paragraph 10.3, however in order to meet the Basic Conditions of having regard to national policy and guidance, and contributing to sustainable development, SCC's view is that this should be brought into policy. NPPF paragraph 92a states that planning policies and decisions should plan positively for the provision of community facilities. Accessible services "that reflect the current and future needs of communities' health, social and cultural wellbeing" is part of the definition of sustainable development in paragraph 8b of the NPPF.

In responding to the pre-submission draft of the plan SCC recommended that land be set aside in a residential allocation for an early years setting. In further discussions with the Town Council it was suggested that the Chicken Factory and Rettery site, allocated in Policy Eye 9, would be a good candidate. The site is centrally located and well connected and the vision for the area seeks to improve that connectivity.

SCC recommends that an additional requirement is added to Policy Eye 9 for 915.2m² to be reserved on the site for an early years setting.

Policy Eye 14: Sports and Leisure Provision at Hartismere High School

In principle the County Council can support this provision at the high school and wish to work with the school and town council as this progresses to ensure that any necessary expansion to capacity at this school can also be delivered.

1

Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX
www.suffolk.gov.uk

Flooding

SCC is the Lead Local Flood Authority in Suffolk. It is welcome that the Town Council has taken on recommendations in our previous response, however some modifications are required to meet the basic conditions

It is noted that Policy Eye 9 and in paragraph 7.3 reference the sequential test for assessing flood risk within a site. SCC interprets that this is intended to affect the layout of the site to avoid areas of highest flood risk within the site boundary. In principle the county council agree, however this is not the correct application of the sequential test. The sequential test is an assessment to determine if a particular site is a suitable location for development baring in mind flood risk, rather than an assessment to determine the detailed flood risks of a particular site. However, if parts of site are within areas of flood risks then the layout of sites should reflect this and the policy should direct the site layout.

In order to meet the Basic Conditions it is recommended that the text in Policy Eye 9 stating “*a flood risk assessment applying the sequential test should be undertaken*” is deleted and replaced with the text “*a flood risk assessment should be undertaken, taking account of flooding from all sources, to identify the effects of the development on flood risk elsewhere and identify the most appropriate measures to address flood risks. Site layouts should take into account and where possible avoid areas at risk of flooding with a site.*”

General Comments

Policy Eye 34

In the pre consultation draft of the neighbourhood plan SCC stated that this policy (at the time titled Policy Eye 33) was problematic. SCC considers the second sentence inappropriate and made the following comments on the pre submission plan:

“The second sentence of this policy is not appropriate as CIL expenditure is determined by the regulation 123 list at Mid Suffolk District Council. SCC will also make applications to Mid Suffolk District Council for CIL funding in line with its responsibilities. This will include expenditure within Eye, such as expanding school facilities, however there may also be expenditure from CIL which serve a wider, strategic purpose, meaning that it is not spent in Eye directly. Examples of this from the regulation 123 list are the provision of waste infrastructure or strategic flood measures.

As such it is recommended that the second sentence of this policy is deleted.”

In response Eye Town Council stated that they do not agree with the above comments and consider that the policy does recognise that strategic infrastructure needs. SCC do not agree and believe the current wording potentially attempts to preclude the spending of CIL from development in Eye outside of the neighbourhood plan area. This may be needed to address cumulative impacts across the district. It is difficult to attribute proportions of cumulative impacts directly to specific developments. If this were possible other types of developer obligations could be used, such as a section 106 agreement. It would be SCCs preference to have the second sentence of this policy removed in order to prevent limiting potential funding for strategic infrastructure and mitigating cumulative impacts.

Infrastructure Plan

SCC appreciate the comprehensive view the Eye Neighbourhood Plan has taken regarding infrastructure. It is understood that the infrastructure plan (Supporting Document 9) is in draft form, however it is referred to in policy Eye 34. To match with policies and information within the plan the completed version of the infrastructure plan should contain the following:

- Section C – school facilities, needs to be completed. SCC has discussed school infrastructure with the town council and the plan already includes information in paragraphs 6.6 – 6.10 and table five.
- Early years needs should be included in the infrastructure plan, which is acknowledged in paragraph 10.3.
- The movement section should include improvements and additions to the Public Rights of Way network. This may be included in “Cycleways and Footpaths”, however it would be helpful if this was made clear.
- Library facility improvements will be paid for by CIL as stated in the Mid Suffolk Regulation 123 List.

While it is beneficial for the supporting documents to identify sources of funding for specific pieces of infrastructure, it should be noted that the new Community Infrastructure Levy Regulations 2019, which come into force in September 2019, may make changes to how infrastructure is funded.

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. If there is anything I have raised you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Cameron Clow
Planning Officer
Growth, Highways and Infrastructure

(E-2) Ingleton Wood (obo Mid Suffolk District Council)

UPDATE 17 July 2019

The representation submitted by Ingleton Wood (obo Mid Suffolk District Council) was formally withdrawn on 17 July 2019.

The Independent Examiner and Eye Town Council have been notified of this fact.

(E-3) Mid Suffolk District Council (Planning Policy)

Our Ref: Eye Neighbourhood Plan Reg 16 Consultation
Your Ref:

Date: Friday 5th July 2019

Sent by E-mail

Dear Eye NDP Examiner

- 1. Consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)**
- 2. Eye Neighbourhood Development Plan 2018 – 2036**

In December 2018, Mid Suffolk District Council submitted a formal representation on the Regulation 14 Pre-submission draft version of the Eye Neighbourhood Plan. We made a number of suggestions as to how we thought this emerging Plan could be improved and are pleased to see that much of what was said has been taken in account. The District Council also acknowledges the helpful and constructive meeting that took place between it, Mr Andy Robinson (on behalf of Eye Town Council) and colleagues from Suffolk County Council when we worked through our respective comments on the pre-submission draft Plan.

Babergh and Mid Suffolk District Councils (B&MSDC) have recently published a working draft Regulation 18 Preferred Options version of the Joint Local Plan (JLP) which will soon be made available for public consultation. Whilst we appreciate that this has arrived too late to be of major influence in the preparation of the Eye Neighbourhood Plan we feel that there remain some aspects of the submitted Plan that warrant further comment. We also refer to our emerging Infrastructure Delivery Plan which forms a key part of the JLP evidence base.

Page 58: Schools, para 6.6 AND Page 91, para 10.3

This paragraph is mostly in line with the evidence gathered within the emerging B&MSDC Infrastructure Delivery Plan (IDP), which also refers to St Peter and St Paul Primary School expanding to 315 places, with a master plan to expand to 420.

The paragraph mentions that this expansion would require the new pre-school provision to be made elsewhere. The new pre-school provision is also referenced later on in the document on Page 91, para 10.3. On this point we would recommend that the Neighbourhood Plan group considers the potential to allocate land of 0.1ha on the Chicken Factory area (Policy Eye 9 – Redevelopment of the Chicken Factory, which is also a Joint Local Plan proposed site allocation (LA020 - Allocation: Land north of Magdalen Street, Eye).

In relation to the secondary school, this is also consistent with the evidence gathered for the emerging IDP which refers to Hartismere High School expanding to 1,200 places, and post-16 education expanding to 175 places.

Cont./



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Endeavour House, 8 Russell Road, Ipswich IP1 2BX
Telephone: (0300) 1234 000
www.babergh.gov.uk www.midsuffolk.gov.uk

Page 62: Sport Provision, Policy Eye 14

This policy is consistent with the evidence gathered for the emerging IDP, where the IDP refers to additional leisure provision in Eye by expanding sports and recreation facilities available for community use at Hartismere High School, as a desirable project.

Page 91: Para 10.2 AND Policy Eye 34 – Infrastructure

The terms of this policy is unacceptable to the District Council. We would expect development proposals to be determined in line with the Infrastructure policy of the emerging Joint Local Plan Policy SP08 – Infrastructure Provision, which states that the required infrastructure will be provided through a combination of Community Infrastructure Levy (CIL), Planning Obligations, Developer Contributions and where appropriate funding assistance from the Councils / other provider organisations. Please see link below to this draft JLP policy SP08 (on page 55):

<https://www.midsuffolk.gov.uk/assets/Strategic-Planning/JLP-Reg18-2019/Council-v1-BMSDC-Joint-Local-Plan-Preferred-Options-Reg-18.pdf>

Babergh and Mid Suffolk District Councils have also adopted an approach towards expenditure of CIL:

<https://www.midsuffolk.gov.uk/assets/CIL-and-S106-Documents/CIL-SPENDING/FINAL-CIL-Expenditure-Framework-Babergh-and-Mid-Suffolk-Final-amended-March-2019.pdf>

This approach is different to the Neighbourhood Plan Policy Eye 34 – Infrastructure, in that going forward priority to CIL expenditure will be given to infrastructure projects contained in the Councils' IDP.

The Eye Town Infrastructure Requirements (Supporting Document 9) makes reference to the Mid Suffolk IDP of 2014 which is being replaced by our emerging IDP.

We would therefore recommend that Policy Eye 34 – Infrastructure be deleted in favour of a policy worded as follows:

“All development in Eye will be expected to contribute to infrastructure requirements needed for development. The required infrastructure will be provided through a combination of Community Infrastructure Levy (CIL), Planning Obligations, Developer Contributions and where appropriate funding assistance from the Council / other provider organisations.”

Section 4: Housing Proposals

The draft Joint Local Plan identifies a minimum neighbourhood plan housing requirement of 541 homes between 2018 and 2036. We note the site allocations proposed in the neighbourhood plan and would seek full evidence that all of the sites being promoted are suitable, available and deliverable as defined by national planning policy and guidance.

A separate response will also be sent on our behalf by Ingleton Wood LLP.



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Yours faithfully

Robert Hobbs
Corporate Manager - Strategic Planning
Babergh & Mid Suffolk District Councils – Working Together



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(E-4) Environment Agency



Mr Thea Lane
Babergh District Council
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2019/124128/01-L01
Your ref: Eye NP Reg 16 Consultation
Date: 03 July 2019

Dear Mr Lane

CONSULTATION UNDER REGULATION 16 - NEIGHBOURHOOD PLANNING (GENERAL) REGS 2012 (AS AMENDED)

Thank you for your consultation dated 21 May 2019. We have inspected the Regulation 16 Eye Neighbourhood Plan, as submitted, and have highlighted key environmental constraints, as detailed below, which should be considered during the development of the Eye Neighbourhood Plan.

Our principle aims are to protect and improve the environment, and to promote sustainable development, we:

- Act to reduce climate change and its consequences.
- Protect and improve water, land and air.
- Work with people and communities to create better places.
- Work with businesses and other organisations to use resources wisely.

You may find the following document useful. It explains our role in the planning process in more detail and describes how we work with others; it provides:

- An overview of our role in development and when you should contact us.
- Initial advice on how to manage the environment impact and opportunities of development.
- Signposting to further information which will help you with development.
- Links to the consents and permits you or developers may need from us.

Our role in development and how we can help:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf

Flood Risk

Policy 16 recognises that development within the settlement boundary should take into account fluvial flood risk and should not increase the risk of flood elsewhere. This could be developed to state that a site specific flood risk assessment will ensure that this is achieved.

We offer the same comments as in our previous response: We note the Plan includes a constraints plan highlighted the extent of flood zones in the parish. We consider the Plan would benefit further from a separate section detailing flood risk and prevention measures in policies in more detail. Whilst the majority of the parish and site allocation policies are located in Flood Zone 1, there are also significant areas of Zones 2 and 3 within the parish boundary. The River Dove, designated a 'main river' flows through the centre of the parish and we maintain assets on the river.

Sequential Approach

The sequential approach should be applied within specific sites in order to direct development to the areas of lowest flood risk. If it is not possible to locate all of the development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. If the whole site is at high risk (Flood Zone 3), a site-specific Flood Risk Assessment (FRA) should assess the flood characteristics across the site and direct development towards those areas where the risk is lowest.

Please note that the view expressed in this letter by the Environment Agency is a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application.

Please contact me on the details below should you have any questions or would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan.

We trust that this advice is useful.

Yours sincerely

Miss Natalie Kermath
Planning Advisor

Environment Agency
Cobham Road, Ipswich, Suffolk, IP3 9JD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

(E-5) Historic England



Paul Bryant
Neighbourhood Planning Officer
Babergh and Mid-Suffolk Council
By Email Only

Direct Dial: [REDACTED]

Our ref: PL00205494

3 July 2019

Dear Mr Bryant

Ref: Eye Neighbourhood Plan Regulation 16 Consultation

Thank you for your correspondence dated 21 May 2019 inviting Historic England to comment on the Regulation 16 Submission version of the Eye Neighbourhood Plan.

We welcome the production of this neighbourhood plan, but do not wish to provide detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NP, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

(E-6) Natural England

Date: 23 May 2019
Our ref: 283235

Thea Lane
Mid Suffolk District Council
communityplanning@baberghmidsuffolk.gov.uk



BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Ms Lane

Eye Neighbourhood Development Plan 2018 – 2036

Thank you for your consultation on the above dated 21 May 2019

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Alice Watson
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the [Magic](#) website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁵ website and also from the [LandIS website](#)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

⁹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

(E-7) ANGLIAN WATER

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr Stewart Patience
Job Title (if applicable):	Spatial Planning Manager
Organisation / Company (if applicable):	Anglian Water Services Ltd
Address:	Thorpe Wood House, Thorpe Wood, Peterborough
Postcode:	PE3 6WT
Tel No:	██████████
E-mail:	████████████████████

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	Eye 1
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

We note that it is proposed to allocate sites for residential development which are including sites currently with the benefit of planning permission.

Anglian Water has no objection to the principle of residential development on the sites identified in the Neighbourhood Plan.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	✓
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	✓

Signed: Stewart Patience	Dated: 5th July 2019
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(E-8) Highways England



Our ref: Eye NP
Your ref:
Babergh District Council
Endeavour House
8 Russel Road
Ipswich
IP1 2BX

Mark Norman
Operations - East
Woodlands
Manton Lane
Bedford MK41 7LW
Direct Line: [REDACTED]

14 June 2019

Dear Sir,

Eye Neighbourhood Plan consultation

Thank you for your consultation.

We welcome the fact that the promotion of sustainable development, provision of facilities and services and sustainable transport is promoted in your plan despite the challenges thrown up by the rural nature of your village.

The proposed level of development is modest and somewhat remote from the strategic road network. The traffic impact of the proposed development is covered in Babergh, Mid Suffolk and the surrounding districts local plans and therefore should be within the scope of their evidence bases and, if necessary, any adverse impacts suitably addressed

Yours faithfully

Mark Norman
Assistant Asset Manager
Operations (East)

(E-9) UK Power Networks

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr Gary Sims
Job Title (if applicable):	Distribution Planning Technician
Organisation / Company (if applicable):	UK Power Networks Ltd
Address:	Barton Road Bury St Edmunds Suffolk
Postcode:	IP32 7BG
Tel No:	[REDACTED]
E-mail:	[REDACTED]

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	8 (1)(a)(2)	Policy No.	Eye NP Reg 16
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support

Support with modifications

Oppose

Have Comments



Please give details of your reasons for support / opposition, or make other comments here:

Dear Sir,

Further to Notice of Eye Neighbourhood Development plan Work sent to us, please note the following guidance on UK Power Networks overhead lines.

High voltage overhead cables exists on the site development area that you are intending to commence work on and may present a serious risk to life if approached or contacted. It is important that all proposed works should comply with the requirements of Health & Safety Executive Document GS6 "Avoidance of danger from overhead electric lines".

For your information Health & Safety Documents are available from Her Majesty's Stationery Office and local offices of the HSE.

It may be necessary for the above to be diverted to enable your works to proceed. Also please note:

The proposed development is in close proximity to our substation known to us as Eye Primary substation and I have the following observations to make.

Our engineering guidelines state that the distance between a dwelling of two or more storeys with living or bedroom windows overlooking a distribution substation should be a minimum of ten metres if the transformer is outdoor, seven metres if the transformer has a GRP surround or one metre if the transformer is enclosed in a brick building. It is a recognised fact that transformers emit a low level hum which can cause annoyance to nearby properties. This noise is mainly airborne in origin and is more noticeable during the summer months when people tend to spend more time in their gardens and sleep with open windows.

A problem can also occur when footings of buildings are too close to substation structures. Vibration from the transformer can be transmitted through the ground and into the walls of adjacent buildings. This, as I am sure you can imagine, is very annoying.

In practice there is little that can be done to alleviate these problems after the event. We therefore offer advice as follows:

1. The distance between buildings and substations should be greater than seven metres or as far as is practically possible.
2. Care should be taken to ensure that footings of new buildings are kept separated from substation structures.
3. Buildings should be designed so that rooms of high occupancy, i.e. bedrooms and living rooms, do not overlook or have windows opening out over the substation.

If noise attenuation methods are found to be necessary we would expect to recover our costs from the developer.

Other points to note:

4. UK Power Networks require 24 hour vehicular access to their substations. Consideration for this should be taken during the design stage of the development.
5. The development may have a detrimental impact on our rights of access to and from the substation. If in doubt please seek advice from our Operational Property and Consents team at Barton Road, Bury St Edmunds, Suffolk, IP32 7BG.
6. No building materials should be left in a position where they might compromise the security of the substation or could be used as climbing aids to get over the substation surround.

There are underground cables on the site associated with the substation and these run in close proximity to the proposed development. Prior to commencement of work accurate records should be obtained from our Plan Provision Department at UK Power Networks, Fore Hamlet, Ipswich, IP3 8AA.

7. All works should be undertaken with due regard to Health & Safety Guidance notes HS(G)47 Avoiding Danger from Underground services. This document is available from local HSE offices.

Should any diversion works be necessary as a result of the development then enquiries should be made to our Customer Connections department. The address is UK Power Networks, Metropolitan house, Darkes Lane, Potters Bar, Herts, EN6 1AG.

Regards

Gary Sims
Distribution Planning Technician UK Power Networks
Barton Road Bury St Edmunds Suffolk
IP32 7BG

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	<input type="checkbox"/>

Signed: G Sims

Dated: 23/05/2019

(E-10) National Grid



Eye NP Consultation
c/o Mr Paul Bryant
Spatial Planning Policy Team
Babergh & Mid Suffolk District Council
Endeavour House
8 Russell Rd
Ipswich
IP1 2BX

Lucy Bartley
Consultant Town Planner

Tel: xxxxxxxxxxxx
n.grid@woodplc.com

Sent by email to:
communityplanning@baberghmidsuffolk.gov.uk

28 June 2019

Dear Sir / Madam

Eye Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGDDL). Since May 2018, NGDDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

Assets in your area

National Grid has identified the following high-pressure gas transmission pipeline as falling within the Neighbourhood area boundary:

Nicholls House
Homer Close
Leamington Spa
Warwickshire CV34 6TT
United Kingdom
Tel +44 (0) 1926 439 000
woodplc.com

Wood Environment
& Infrastructure Solutions UK Limited
Registered office:
Booths Park, Chelford Road, Knutsford,
Cheshire WA16 8QZ
Registered in England.
No. 2190074



- **FM05 - Yelverton to Stowmarket**

From the consultation information provided, the above gas transmission pipeline does not interact with any of the proposed development sites.

Gas Distribution – Low / Medium Pressure

Whilst there are no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network, please contact plantprotection@cadentgas.com

Electricity distribution

Information regarding the distribution network can be found at: www.energynetworks.org.uk

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition, the following publications are available from the National Grid website or by contacting us at the address overleaf:

- A sense of place – design guidelines for development near high voltage overhead lines: A sense of place design guidelines for development near high voltage overhead lines: <https://www.nationalgrid.com/sites/default/files/documents/Sense%20of%20Place%20-%20National%20Grid%20Guidance.pdf>
- Guidelines when working near NGG assets: <https://www.nationalgridgas.com/land-and-assets/working-near-our-assets>
- Guidelines when working near NGETT assets: <https://www.nationalgridet.com/network-and-assets/working-near-our-assets>

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown overleaf to your consultation database:

Lucy Bartley

Consultant Town Planner

n.grid@woodplc.com

Wood E&I Solutions UK Ltd
Nicholls House
Homer Close
Leamington Spa
Warwickshire
CV34 6TT

Spencer Jefferies

Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
Warwickshire
CV34 6DA

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

[via email]

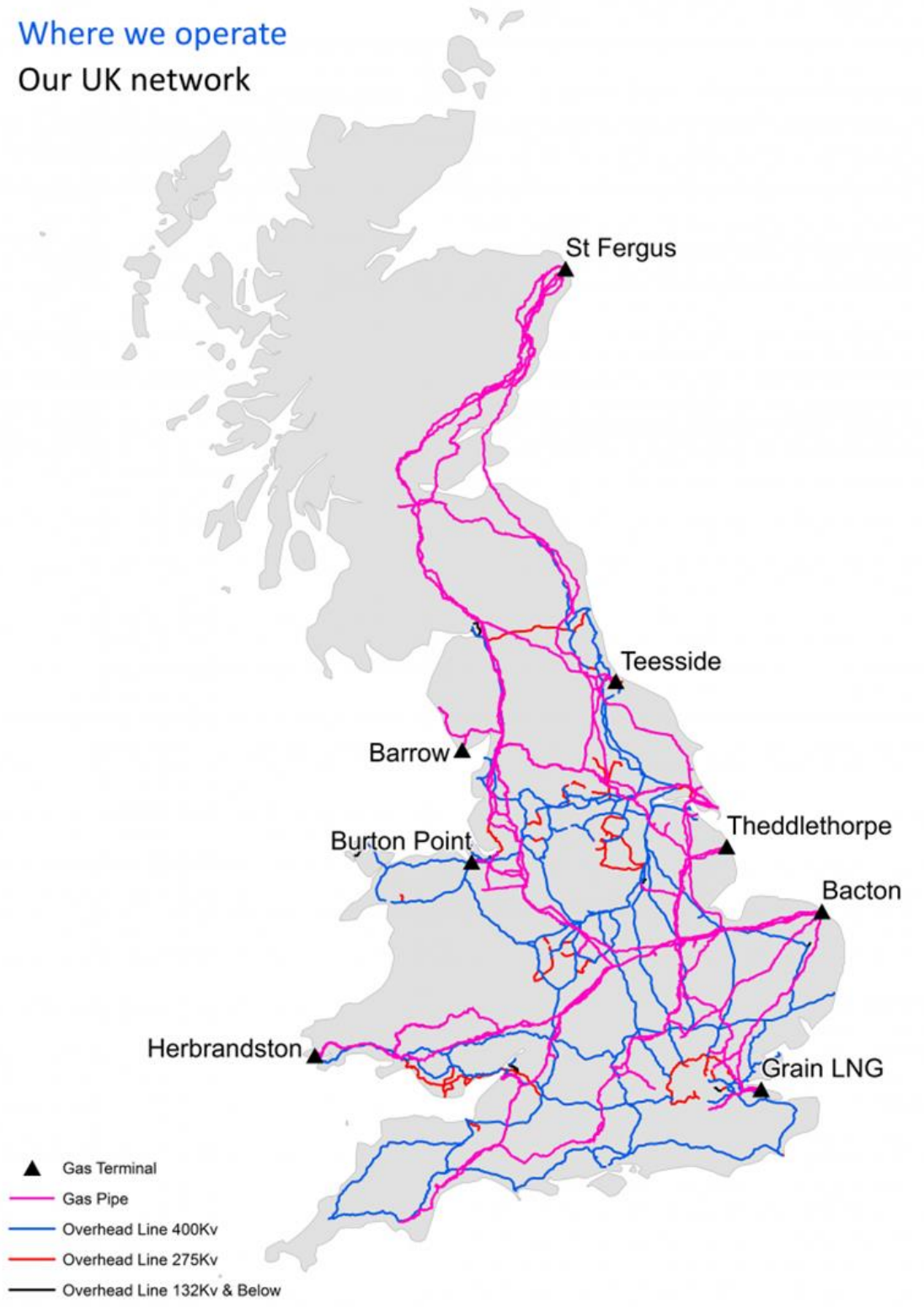
Lucy Bartley

Consultant Town Planner

cc. Spencer Jefferies, National Grid

APPENDIX 1: NATIONAL GRID'S UK NETWORK

Where we operate
Our UK network



(E-11) Ipswich & East Suffolk Clinical Commissioning Group

Response Form Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Chris Crisell
Job Title (if applicable):	Estates Planning & Support Project Manager
Organisation / Company (if applicable):	Ipswich & East Suffolk CCG
Address:	Ipswich & East Suffolk CCG & West Suffolk CCG Endeavour House, 8 Russell Road, Ipswich
Postcode:	IP1 2BX
Tel No:	[REDACTED]
E-mail:	[REDACTED]

Section Two: Your representation(s)

To which part of the document does your representation relate? *(You may wish to complete a separate form for each separate representation)*

Paragraph No.	General Comments	Policy No.	N/A
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support

Support with modifications

Oppose

Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

The Clinical Commissioning Group is encouraged to see that comments made previously have been taken into consideration when developing this Neighbourhood Plan. The comments made around Hartismere Health and Care makes mention of the strategy currently under development. There is a strategy at looking to better utilise the area in (figure 3) and the CCG is very hopeful that it will be able to announce more details quite soon.

The Neighbourhood Plan focuses on healthy lifestyles and designing developments where health is a crucial factor and this is to be commended. A major part of health and care is around the support of prevention, this needs to be the forefront of any development going forward and designing green spaces and sports facilities encourages healthy lifestyles. It is understood that the NP is looking to encourage younger families into the area but it must also be recognised that there is a significant elderly presence in Eye and the services available to them needs to reflect this.

The mention of an early year's centre possibly being able to co-locate with a community facility/health facility is an interesting one but something that has not been part of any strategy discussions. The CCG welcomes the proposal to co-locate public sector facilities as it very much part of a wider strategy that NHS England and the CCG totally supports.

The CCG would like to reiterate that Eye Health Centre is at capacity and any further development will result in it becoming over capacity. Part of the health strategy for the area is to mitigate this increase but the CCG will be requesting developer contributions from the developments in this plan to make sure that the infrastructure recommended is created.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues.

If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible .

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	X

Signed:

Dated: 10/06/2019

(E12) NHS Property Services

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Miss Evelyn Jones
Job Title (if applicable):	Town Planner
Organisation / Company (if applicable):	NHS Property Services
Address:	NHSPS Town Planning Team – 2 nd Floor 99 Gresham Street London
Postcode:	EC2V 7NG
Tel No:	
E-mail:	evelyn.jones@property.nhs.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Policy Wording & 4.19 – 14.20	Policy No.	Policy Eye 4
---------------	-------------------------------	------------	--------------

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:
NHSPS supports the principle of the sites allocation for residential and/or care home uses
NHSPS welcomes and supports the changes made to paragraphs 4.19 and 4.20 following our previous representations.
NHSPS can only support the proposed Policy Wordings with the suggested alterations (as below)

What improvements or modifications would you suggest?

As drafted, the policy wording does not reflect the supporting text in distinguishing surplus land, and does not allow flexibility for how the site may come forward in the future.

NHSPS therefore proposes the following amendments (as tracked changes) to the policy wording on Page 37, to ensure the policy is sound and legally compliant:

POLICY EYE 4 - LAND AT EYE HEALTH CENTRE AND HARTISMERE HEALTH AND CARE
Health commissioners are currently developing a strategy for the future delivery of health services in this area. As part of this strategy part of the site 'Land at Eye Health Centre/Hartismere Health and Care (0.74 hectares)' may become available for redevelopment during the plan period is proposed for housing. Approximately 0.4 hectares is proposed for market housing providing about 14 dwellings at 35 dwellings per hectare and the remaining 0.34 hectares is proposed for sheltered housing at 85 units per hectare providing about 29 units Any part of the site that is declared as surplus to the operational healthcare requirements of the NHS by health commissioners, is considered suitable and available for residential use (housing and/or care home uses).

Electric Vehicle Charging should be provided in accord with Policy Eye 30.

Before Planning Permission is granted:

- a) site investigations will be required to determine ground water contamination risk;
- b) archaeological investigations will be required.

NHSPS will only be able to support the proposed policy wording with the amendments as shown above.

Should a specific dwelling capacity figure be required to support the allocation we would suggest an assumption of 26 units (35dph) or a larger number of care home units.

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

NHSPS will be happy to agree amendments to the policy wording through written representation.

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	X

Signed:	Dated: [5 July 2019]
----------------	-----------------------------



3rd July 2019

Eye Neighbourhood Development Plan 2018 - 2036

REGULATION 16 RESPONSE FROM ALL SAINTS SCHOOLS TRUST

This letter is a formal response to the Regulation 16 consultation on behalf of the All Saints School Trust and St Peter and St Paul Church of England Primary School, Eye.

Policy Eye 20 – Local Green Spaces

We **oppose** the designation of “primary school playing field” as local green space. The reasons we oppose this are:

- School playing fields are private land without public access
- It is possible part of this land may be needed to expand the capacity of the school
- There is already adequate protection of school playing fields as consent is required from the Secretary of State for Education for any disposal or change of use of a site (please see <https://www.gov.uk/government/publications/protection-of-school-playing-fields-and-public-land-advice>)

We request that all subsequent references to the school’s playing field as a green space should also be removed:

Page No	Reference
71	Policy Eye 20
72	Site 6
73	Map
99	Policy map (G6)
101	Map (G6)

Policy Eye 13 – Land for Primary School, West of Hartismere School

Eye Town Council resolved on 20th March 2019, to remove mention of a new, relocated or alternative primary school from the neighbourhood plan. The Councillors resolved to change Policy Eye 13 to: Land for Education Site, West of Hartismere School and **not** Land for Primary School, West of Hartismere School. We understand that this change was accidentally missed and that Eye Town Council acknowledge



that this was a mistake that will be corrected, and the Policy reworded to ensure compliance with the Town Council resolution. We note that references to this policy appear on many pages of the Plan and to avoid any further confusion, we are listing below the instances where the policy is mentioned and that need to be updated.

Page No	Wording requiring amendment
7	List of Policies
8	Figure 10
27	Policy Assessment matrix
49	Point 5.2 second line: "a possible new Primary School" should to reworded as "a site for educational purposes". Point 5.3 (d) – needs to be reworded, ie Policy Eye 13 which proposes a site for Education, West of Hartismere High School.
58	Point 6.8 This paragraph should be reworded with mention of "an alternative, reserve, Primary School site to provide the option of a new school (either to replace or in addition to the current school)" – should be reworded stating that the site is reserved as a site for education.
59	Point 6.9 the costs as written are no longer relevant and should be removed.
60	Point 6.11 With the removal of mention of a replacement/additional primary school, this paragraph is no longer relevant and should be removed.
60	Figure 10 – needs to be retitled "Land for Education Site, West of Hartismere High School"
60	Policy Eye 13 – needs to be rewritten to reflect the Town Council's resolution to include the site as an education site and not a primary school.
95	Table 6 – Infrastructure & Delivery Table Eye 13 will need to be rewritten in view of the resolution of Eye Town Council regarding this policy.
99	Policy Plan – Key PE13 will need to be updated to remove primary school and update to read Land for Education Site, West of Hartismere High School.

James Hargrave
Chairman of Trustees
All Saints Schools Trust

Melanie Barrow
Chief Executive Officer
All Saints Schools Trust

(E-14) Suffolk Preservation Society



Little Hall Market Place
Lavenham Suffolk CO10 9QZ
Telephone (01787) 247179
email sps@suffolksociety.org
www.suffolksociety.org

26 June 2019

townclerk@eyesuffolk.org

Town Clerk,
Eye Town Council
C/O Volunteer Centre
20 Broad St
Eye IP23 7AF.

Dear Ms Alcock

Re: Eye Neighbourhood Plan, Submission Draft Consultation

I am writing further to our letter dated 18 December which made detailed representations on the earlier draft of the emerging Eye Neighbourhood Plan. Having reviewed the latest iteration, on behalf of the SPS, I would like to make the following observations:

Firstly, the design guidance prepared by AECOM is welcome and provides detailed analysis of the character of the historic town and highlights the importance of high quality urban design in the delivery of successful development. However, in order for this guidance to be fully effective it is recommended that this document and its recommendation are referred to in Policy EYE16 at point c.

We welcome the deletion of the proposal for housing close to the grade I church on the primary school site.

We remain disappointed that our earlier comments relating to heritage, and especially non designated heritage assets, have not been taken on board and would reiterate the points set out in our previous letter.

Finally, we remain concerned by the range of landscape designations and the lack of a map that clearly shows them within the NP. We also note that the Policy Map does not include Visually Important Spaces referred to within the plan and the Glossary does not include definitions of all the terms used including Special Landscape Area and Visually Important Open Space. Of greater significance is the designation, Special Landscape Area, which is taken from the MSDC Local Plan 1998. However, this term is no longer in use and is not NPPF compliant. As I am sure you are aware, the Framework refers only to Valued Landscapes and it would be prudent that the appropriate terminology is adopted in your NP rather than using an obsolete term from a Local Plan that is out of date.

We trust that you will find these comments helpful.

Yours sincerely,

Fiona Cairns
BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC
Director

Cc Heritage Team

(E-15) AAH Planning Solutions



5th July 2019

Neighbourhood Planning,
c/o Mr. Paul Bryant,
Spatial Planning Policy Team
Mid Suffolk Council,
Endeavour House,
8 Russell Road,
Ipswich,
IP1 2BX

2 Bar Lane
York
YO1 6JU
+44 (0)1904 629258

27 Old Gloucester Street
London
WC1N 3AX
+44 (0)207 419 5113

info@aahplanning.com
www.aahplanning.com

Dear Sir or Madam,

Re: Regulation 16 Consultation on Eye Neighbourhood Plan

I refer to the above document and the consultation upon its contents. Please accept this letter as our response to the Regulation 16 consultation.

The Eye Neighbourhood Plan is accompanied by Basic Conditions Statement, Consultation Statement, HRA Statement and SEA Statement.

Generally, with regard to Plan Making including Neighbourhood Plans the NPPF states at paragraph 18 that: *'Policies to address non-strategic matters should be included in local plans that contain both strategic and non- strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies.'*

Paragraph 28 of the NPPF states that: *'Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.'*

Paragraph 29 of the NPPF states that: *'Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.'* Footnote 16 clarifies with regard to this paragraph that *'Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.'*

Paragraph 37 of the NPPF 2019 states that: *'Neighbourhood plans must meet certain 'basic conditions' and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum.'* Footnote 21 to this paragraph defines other legal requirements as those *'set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).'*

Paragraph 8 Schedule 4B to the Town and Country Planning Act 1990 (as amended) sub paragraph 2 provides for the Basic Conditions to which a Neighbourhood Plan are to be tested against which can be summarised as:

- Is the Plan appropriate having 'regard to' national policies and advice contained in guidance issued by the Secretary of State?
- Does the Plan contribute to the achievement of sustainable development?
- Is the Plan in general conformity with the strategic policies contained in the development plan for the Mid Suffolk District Council area?
- The plan should not breach, and should otherwise be compatible with, EU obligations

The Basic Conditions Statement submitted with the Eye Neighbourhood Plan details how Eye Parish Council consider they have met the above tests; however, we have the following comments to make to the contrary:

We consider that there are fundamentally issues with the overall housing strategy and site selection process with at least three of the sites, proposed to be allocated under Policy Eye 1 a (ii), (iii)) and (vi), are not realistic or even achievable in their current form. There are also a number of policies within the Neighbourhood Plan that simply do not comply with the principles of the sustainable development and run contrary to the NPPF to such an extent that as currently drafted the Neighbourhood Plan cannot meet the first two basic conditions.

Housing Strategy

Policy Eye 1 of the submission Neighbourhood Plan provides for 579 dwellings between 2018 and 2036 with 519 dwellings proposed via the allocations, a reserve site of 174 dwellings and windfall allowance of 60 dwellings on sites of ten or less dwellings. Paragraph 4.12 (a) confirms that the District Council are unable to provide any guidance on the housing requirement and the strategy for the distribution of housing based on the premise that the adopted plan is out of date and the emerging Joint Plan is not at an advanced enough stage to be given weight. Paragraph 4.13 confirms that the site allocations in this Plan are not based on a target number of homes.

It is difficult to comprehend how the Neighbourhood Plan can be brought forward without an up-to date housing requirement for the District and an up-to date housing distribution strategy to take account of.

Policy Eye 1 provides for a windfall allowance of 60 dwellings on sites of less than 10 dwellings. The Neighbourhood Plan based on evidence shows continued supply at this rate would equate to 120 dwellings but then assumes 50% of this rate with no justification.

Allocations

Policies Eye 1 and Eye 3-7 cumulatively allocate housing sites for up to 579 dwellings between 2018 and 2036. We have the following comments to make on the proposed sites:

- **Policy Eye 1 a (ii) Eye Health Centre and Hartismere Health and Care – around 43 homes** - The development of this allocation is reliant upon the NHS deciding to rationalise and/or relocate. Paragraph 4.19 confirms that the NHS are looking at a strategy for the area to deliver health care in the area and that this may result in there being a surplus on this site to be brought forward for development. There is no evidence that the site is available or even that there is a realistic prospect of there being a surplus land to come forward for an alternative use.
- **Policy Eye 1 a (iii) Chicken Factory, Yaxley Road – around 78 homes**- The development of this allocation is reliant upon the relocation of the existing factory and there is no evidence that there is a realistic prospect of this taking place. The Neighbourhood Plan and supporting assessments also confirm that the site cannot viably deliver any affordable housing. Again there is no evidence that the site is available

or even that there is a realistic prospect of there been a surplus land to come forward for an alternative use.

- **Policy Eye 1 a (vi) Victoria Mill Allotments – around 72 homes** – This allocation is also designated as a Local Green Space and is reliant upon the relocation of the Allotments with no strategy in place. There is no evidence that either of these are a realistic prospect of this happening.

We are of the opinion that these sites will not come forward for development in the short to medium term if at all.

Site Assessments

We have concerns over how the sites have been considered and the consistency within the overall assessment of the sites and those that have been discounted.

The Site Assessment document does not provide specific evidence from landowners to establish that the sites are available for development. We do not consider that there is sufficient evidence on suitability, availability and deliverability of the sites at the scale that they are proposed to be allocated for. We do not consider that the Neighbourhood Plan provides sufficient evidence to establish that the proposed allocations are:

- available i.e. that the site owner is willing for their site to come forward at the proposed scale of development.
- suitable i.e. – that constraints information has been considered and tested, e.g. flooding, archaeology, and that a detailed assessment of the infrastructure needed to support development and access it
- deliverable – i.e. that the site is viable for development.

We do not consider that the Neighbourhood Plan has consistently considered all the reasonable alternative sites or the appropriate considerations for development being deemed suitable. Site 1a land to the north of Maple Way, for example, is discounted on the basis of ‘the site is within a Special Landscape Area and access via Maple Way and Bellands Way is very poor.’ However, the site assessment concludes that the site is suitable for development and Policy Eye 17 Special Landscape Areas allows for development that does not adversely affect the area and effects can be mitigated against.

We therefore consider the overall site assessments have not been carried out in accordance with the requirements of the NPPF.

Policies

Policy Eye 15 *Development outside of the Settlement Boundary* provides for development outside of the development limits to resisted unless it is of the development types listed this directly conflicts with paragraphs 77 and 78 of NPPF 2019 as well as the presumption itself. It also perpetuates the theme of protection of the open countryside for its own sake and its limitations are contrary to the balanced approach of the NPPF 2019. The NPPF has never and still does not provide for a restrictive approach to development outside settlements in this manner. It does not protect the countryside for its own sake or prescribe the types of development that might be acceptable. The policy as worded opposes the balancing exercise and precludes otherwise sustainable development by default and thereby defeats the presumption in its favour.

Policy Eye 20 Local Green Spaces designates Victoria Allotments as a Local Green Space which the policy seeks to protect and only permits the development of in ‘very special circumstances including if their value can be replaced in another location.’ The preamble to the policy at paragraph 7.13 explains the reason for the designation stating that: *‘They have been assessed around particular values:*

a.important for biodiversity;

b.important for landscape and views to retain character of town;

c.important for linking green spaces together to meet human and wildlife needs; and

d.important for access and recreation values – health and wellbeing as well as sustainable movement.'

Yet Policy Eye 1 and Eye 7 allocate the site for 72 homes. It is difficult to comprehend within the same Plan why such a conflict arises. It makes no sense to designate an allotment as a local green space and also allocate it to be development for 72 homes.

Conclusion

We consider that there are fundamentally issues with the housing strategy and site allocation selection process with at least three of the sites proposed to be allocated under Policy Eye 1 a (ii), (iii) and (vi)) not realistic or even achievable in their current form. Policies Eye 15 and 20 do not comply with the requirements of the NPPF or indeed the presumption in favour of sustainable development.

In the context of the above commentary we do not consider that Eye Neighbourhood Plan meets the basic conditions and we urge the Council and/or the Independent Examiner to reconsider the compliance with the NPPF and therefore the basic conditions test of the Eye Neighbourhood Plan.

If you need any further information or wish to discuss matters further, then please don't hesitate to contact me at this office.

Yours Sincerely,

Joe O'Sullivan
BA HONS PGDIP URP MRTPI
Associate Planner

(E-16) CPO Solutions (obo Warren Hill Farms)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Richard John Heldreich
Job Title (if applicable):	Chartered Surveyor
Organisation / Company (if applicable):	CPO Solutions
Address:	The Old Rectory Badingham Suffolk
Postcode:	IP13 8LA
Tel No:	██████████
E-mail:	richard.heldreich@cposolutions.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Mr Andrew West
Address:	Warren Hill Farms Warren Hills Oakley Eye
Postcode:	██████████
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Policy No.
	Eye 1, 12, 15 and 20

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

I consider that there are fundamental issues with the housing strategy and site allocation selection process with at least three of the sites proposed to be allocated under Policy Eye 1 a (ii), (iii) and (vi) are neither realistic nor even achievable in their current form.

The Site Assessment document does not provide sufficient specific evidence from landowners to establish that the sites are available for development. We do not consider that there is adequate evidence on suitability, availability and deliverability of the sites at the scale that they are proposed.

I also have concerns over how the sites have been considered and the consistency within the overall assessment of the sites and those that have been discounted. Site 1a land to the north of Maple Way, for example, is discounted on the basis of 'the site is within a Special Landscape Area and access via Maple Way and Bellands Way is very poor.' However, the site assessment concludes that the site is suitable for development and Policy Eye 17 Special Landscape Areas allows for development that does not adversely affect the area and effects can be mitigated against.

It is difficult to comprehend how the Neighbourhood Plan can be brought forward without an up-to date housing requirement for the District and an up-to date housing distribution strategy to take account of.

Policy Eye 15 does not comply with the requirements of the NPPF particular paragraphs 77 and 78 of or indeed the presumption in favour of sustainable development. Policy Eye 20 designates Victoria Mill Allotments as a Local Green Space and protects it from development whilst also allocating the allotments for the development of 72 homes.

Policy Eye 12 – Crematorium; has been arbitrarily proposed and identified with scant evidence of either the need or appropriateness of location for such a facility. There seems to have been no assessment made of the impact of developing such a facility in the proposed location. The simplistic assumption that this facility is appropriately sited because it is next to the existing cemetery is flawed.

In summary I do not consider that Eye Neighbourhood Plan meets the basic conditions and I urge the Council and/or the Independent Examiner to reconsider the compliance with the NPPF and therefore the basic conditions test of the Eye Neighbourhood Plan.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

A holistic review of the proposed residential sites included within the plan in order to obtain a sound basis for selection. Additionally, there is a fundamental need to examine the need, siting and issues from the operation of a crematorium on the site identified.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

It is apparent that there are a significant number of clear policy contradictions which require examination.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	X

Signed: [R Heldreich]	Dated: 5/7/2019
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Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	See below.	Policy No.	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

Please see accompanying report for Representations relevant to Sections 4, 5, and 8 of the NDP and Supporting Document 19.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please see accompanying report.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...
<i>Please be as brief and concise as possible ..</i>
<i>(Continue on separate sheet if necessary)</i>

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	Yes
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	Yes

Signed: [Luke Thorpe]	Dated: 03.07.19
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**EYE NEIGHBOURHOOD PLAN 2018-2036
DRAFT SUBMISSION (REGULATION 16)
CONSULTATION**

**REPRESENTATIONS ON BEHALF OF
AMBER REI HOLDINGS LTD.**

**POULTRY PROCESSING FACTORY
MAGDALEN STREET
EYE
MID SUFFOLK
IP23 7AJ**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Prepared by: Luke Thorpe

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1. INTRODUCTION

- 1.1 These representations are made by Pegasus Group on behalf of Amber REI Holdings Limited in response to the Eye Neighbourhood Plan ("NDP") Regulation 16 Draft Submission Consultation. These representations are made primarily in relation to the Poultry Processing Factory ("Chicken Factory") off Magdalen Street, Eye, which is owned by Amber REI.
- 1.2 We are pleased to have the opportunity to make a representation on this site in respect of the NDP and acknowledge the proactive approach assumed by the Eye Steering Group up to this point. We recognise the important part they are continuing to play in delivering and realising the vision of the Eye Community using the Neighbourhood Development Plan Process.
- 1.3 These representations consider the basic conditions relevant to the preparation of a Neighbourhood Development Plan, as defined by Paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). This requires Neighbourhood Plans to:
- Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - The making of the neighbourhood plan contributes to the achievement of sustainable development;
 - The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - The making of a neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
 - Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.
- 1.4 These representations are relevant to specific details within Section 4 (Housing Proposals), Section 5 (The Rettery and Chicken Factory Area) and Section 8 (Movement); as well as the contents of Supporting Document 19 ('Neighbourhood Masterplanning and Design Guidelines').

-
- 1.5 The representations focus on the wording of policies and explanatory text relevant to the allocation of the Chicken Factory. Modifications are also proposed to improve clarity and effectiveness of technical policies related to movement (Section 8).

2. THE NATIONAL PLANNING POLICY FRAMEWORK 2019

2.1 The National Planning Policy Framework (NPPF) 2019 sets out the Governments planning policies for England and how these should be applied in Local and Neighbourhood Plan preparation and decision-making. The NPPF constitutes a material consideration.

2.2 NPPF Paragraph 29 outlines the purpose and standing of Neighbourhood Planning within the planning policy hierarchy:

"Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies."

2.3 With regard to preparing Neighbourhood Plans and the basic conditions outlined above, NPPF paragraph 37 states that *"Neighbourhood plans must meet certain 'basic conditions' and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum."*

2.4 With regard to delivering sufficient levels of housing, NPPF Paragraph 66 states that *"Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority"*.

3. NEIGHBOURHOOD DEVELOPMENT PLAN

- 3.1 This section outlines the key considerations relevant to the site and recommended amendments to the Eye Neighbourhood Development Plan (“NDP”). The NDP once made will form a part of the Local Development Plan Framework and will be an important element of decision making in the Eye Neighbourhood Area.

Section 4 (Housing Proposals)

- 3.2 In Policy Eye 1.a.iii, the NDP allocates the Chicken Factory 78 homes. Paragraph 4.22 of Section 4 identifies the site as being allocated for 79 market homes. Without undertaking the necessary detailed assessments associated with the submission of a planning application, it is not possible to be so prescriptive in terms of the exact capacity of the site. As a development plan, it would be more appropriate to recommend a capacity of around 80 dwellings.

Section 5 (The Rettery and Chicken Factory Area)

- 3.3 We welcome some of the changes incorporated into the Chicken Factory Allocation on the back of the Regulation 14 Consultation Representations. The below paragraphs outline where alterations to the Submission Draft are required to improve the effectiveness and clarity of the NDP.
- 3.4 Paragraph 5.7 notes the desirability for the allocation to incorporate the “former station buildings” within the development. Further clarity should be given to what the SCC Design Guidance is, particularly as the NDP contains its own Design Guidance Document, Supporting Document 19 (‘Neighbourhood Masterplanning and Design Guidelines’).
- 3.5 The Station Buildings are identified in Supporting Document 19. The Station Buildings are in a generally poor condition and there is doubt as to whether they could be feasibly and viably retained. To note, the buildings are situated outside of the Conservation Area and therefore have no statutory protection. As the ability and appropriateness of retaining the buildings is in doubt, the reference in Paragraph 5.7 is not justified. At this stage, it is recommended that this portion of the paragraph is removed.
- 3.6 Paragraph 5.11 states that *“there will be additional traffic generated by the location of a new food outlet in the Town Centre. Before planning permission is granted a traffic management plan will be required”*. This statement does not appear to be supported by any objective evidence and is therefore unsubstantiated. Given the

scale of the proposed development, a Transport Assessment and Travel Plan are likely to be required during the application / decision stages. These will ensure that the proposed development is suitable and compatible with the local highway network's capacity. A Transport Assessment will make the most appropriate recommendations and mitigation measures relevant to the development and surrounding context. It is therefore recommended that Paragraph 5.11 is removed from the explanatory text.

- 3.7 In Policy Eye 9 (Redevelopment of the Chicken Factory), four technical criteria have been imposed requiring an Archaeological Evaluation, a Traffic Management Plan, Site Investigation Report to determine ground water contamination and a Flood Risk Assessment and Sequential Test, prior to planning permission being granted. These requirements are too prescriptive and rigid, they are also unsubstantiated and are therefore not justified. In order to better align with local and national policies and planning processes, it is recommended that this section of the policy is amended to state that: Development is expected to provide assessments that identify the potential impacts from the allocation (with respect of archaeology, transportation, contamination and flood risk), any necessary mitigation measures identified should be secured in any successful scheme. This approach will ensure that the planning system can continue to operate effectively, with the most suitable assessments and mitigation measures being provided for each technical area.

Section 8 (Movement)

- 3.8 Policy Eye 32 (Traffic Management) requests that "*a Traffic Management Plan should be prepared to identify the most appropriate measures including traffic calming, 20 MPH areas, one way streets and lorry routing to ameliorate the growth in traffic and ensure the Town Centre is a pedestrian friendly place to shop*". We recognise that traffic issues are a significant concern for local residents and businesses and, that these concerns should be reflected in the NDP. However, as discussed in Paragraph 3.6 above, the NDP is not supported by an objective assessment of the transportation situation in Eye. This policy requirement therefore has no evidential basis that would substantiate and justify the need for the suggested highways improvements. In the absence of evidence to substantiate this requirement, the policy is not justified.
- 3.9 The policy's supporting text proposes that a traffic management plan (TMP) is prepared as soon as possible to address the policy aims. It is not clear who is responsible for preparing the proposed TMP, nor when it will be prepared. The lack

of a Transport Management Plan should not be used to frustrate development coming forward. To note, we would object to this policy putting the responsibility of producing the TMP on prospective developers, land owners or others with an interest in land. If a suitable public body (e.g. the District Council, County Council or the NDP Steering Group) cannot assume responsibility for producing the Traffic Management Plan, this policy should be omitted from the NDP or amended as per Paragraph 3.10 below.

- 3.10 Transport Assessments, Traffic Management / Travel Plans will be required and provided where necessary within an individual planning application submission; it would be unreasonable and inappropriate to require a developer or land owner to prepare a TMP for the wider settlement, particularly with no evidence to support this requirement. Individual Transport Assessments can identify the necessary and appropriate traffic management measures needed to mitigate the impact of development.

4. SUPPORTING DOCUMENT 19 – NEIGHBOURHOOD MASTERPLANNING AND DESIGN GUIDELINES

- 4.1 This section focuses on the contents and implications of Supporting Document 19 ('Neighbourhood Masterplanning and Design Guidelines') (the "Guidance"). The Guidance was produced in April 2019 by AECOM, it was not consulted upon during the Regulation 14 Pre-Submission Draft Neighbourhood Plan Consultation. The document provides general design guidance relevant to the context and character of Eye, as well as site specific masterplanning guidance.
- 4.2 The Guidance is not referred to in any specific policy in the NDP, but is instead separate to other policies under Paragraph 7.5 (headed Design Guidance) under Section 7 (Safeguarding and Development Control). The Paragraph states that the Guidance "*should be referred to when detailed proposals for development/planning applications are prepared*". The explanatory nature of the paragraph is supported as it allows an appropriate degree of flexibility to balance a variety of considerations and constraints during the design process. We do, however, have some concerns about the site specific content in the Guidance.
- 4.3 To note, pages 56 and 63 of the Guidance note that the Chicken Factory site will have 78 dwellings, page 60 states 79 dwellings. In line with Paragraph 3.2 above, these figures should be amended to state "around 80 dwellings" for clarity and an appropriate degree of flexibility.
- 4.4 The inclusion of site specific design guidance in Section 3.4 of the Guidance is generally supported, however aspects of the guidance are considered to be too prescriptive and rigid. To note, we are supportive of the inclusion of the proposed overspill / visitor parking to the west of the site and the general location of the proposed retail unit. This is consistent with the planning permission granted for a new car park (ref. 1891/16) and also reflects the most appropriate location for a retail unit on site.
- 4.5 Paragraph 3.4.2 (Site Layout) notes that flats are to be housed in 2 to 3 storey buildings and the location of flats is shown in the Concept Masterplan and Key (pages 64-65). The proposed location and requirement of flats in the Guidance is considered to be too prescriptive and fails to take account of other considerations, such as local housing need and mix. The location of 3 storey buildings as shown on the Concept Masterplan is supported due to their ability to add variety to building heights, which corresponds with the existing settlement's built form. It is therefore

recommended that reference to flats is removed and replaced by reference for potential building heights.

- 4.6 The Concept Masterplan identifies locations for new greenspace within and adjacent to the site. The provision of greenspace to the west is supported, however the greenspace to the east of the site should be removed from the Concept Masterplan as it risks compromising the ability for the development (residential and retail) to be appropriately designed and delivered. At this stage the concept masterplan should identify the key developable areas and a general road layout, it should however remove specific details such as open space and the retail unit's parking location.
- 4.7 Paragraph 3.4.2 also notes that there is an opportunity to retention the former railway station brick tower. As noted in Paragraph 3.5 above, there is uncertainty surrounding the feasible and viable retention of the former station building due to its condition and the ability to deliver development and pedestrian / vehicle connections through the site. The Guidance should reflect this by noting that its retention should be dependent on the feasibility and viability of delivering necessary restoration work, the wider development and other NDP / Design Guidance proposals, such as the provision of a link to the public car park.
- 4.8 As discussed above, it is considered that certain elements of Section 3.4 and Paragraph 3.4.2 of Supporting Document 19 are too prescriptive and unrealistic. It is proposed that the design guidance specific to the Development of the Chicken Factory should be amended to allow more flexibility and the balancing of various considerations, constraints and evidences during the design process. Without introducing this flexibility, there is a risk that bring development coming forwards could be hindered.

5. CONCLUSION

- 5.1 The Eye Neighbourhood Development Plan is giving the Eye community the ability to develop a collaborative vision for the settlement. This process has the potential to achieve consensus in the delivery of sustainable development. We support the NDPs overall approach to this.
- 5.2 Changes made to the NDP following the Regulation 14 Consultation are acknowledged and appreciated, particularly with regard to the provision of carparking to the west of the existing factory buildings. These representations submitted to the Regulation 16 Consultation outline key amendments that will improve the deliverability, effectiveness and clarity of the NDP and specific policies.
- 5.3 The further changes recommended in Sections 3 and 4 above, are required to ensure that the NDP is effective in practice, compatible with local and national planning policies and capable of delivering sustainable development. It is considered that in implementing the recommended amendments, the NDP and specific policies will better meet the 'basic conditions' as set out in Paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended), and so it will be more capable of delivering sustainable development in accordance with NPPF 2018 paragraph 29, 37 and 66 of the Nation Planning Policy Framework 2018.
- 5.4 Considering the above, it is respectfully requested that our comments are considered and implemented into the Submission Version of the Eye Neighbourhood Development Plan.

(E-18) Pegasus Group (obo Mr T W Baldwin)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr TW Baldwin
Job Title (if applicable):	n/a
Organisation / Company (if applicable):	c/o agent
Address:	c/o agent
Postcode:	
Tel No:	c/o agent
E-mail:	c/o agent

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Pegasus Group
Address:	Robert Barber 4 Pioneer House Vision Park Chivers Way Histon
Postcode:	CB24 9NL
Tel No:	01223 202100
E-mail:	robert.barber@pegasusgroup.co.uk

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	4.12-4.13	Policy No.	Eye 1
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

- 1.1 The draft Plan and the AECOM Housing Needs Assessment identifies that to meet the housing needs of Eye 164 dwellings are required over the Plan period to 2036. This figure does not form the strategic housing requirement for the town as set by a district-wide Local Plan. Indeed, at paragraph 4.13 the draft Plan states that the site allocations are “not based on a target number homes but are intended to meet specific housing needs and/or other objectives”.
- 1.2 The emerging Joint Local Plan (JLP) will play a critical role in shaping and determining the level of growth that the Eye Neighbourhood Plan will be required to deliver in the period 2018-2036. The Preferred Options JLP (June 2019) reports a housing need figure of 10,008 dwellings for Mid-Suffolk over the plan period 2018-2036 (Policy SP01). This needs figure is calculated using the Government’s standard methodology for calculating housing need. The JLP also sets out a new Settlement Hierarchy for the district and in doing so classifies Eye in the “Mid Suffolk Market Town and Urban Areas” category. This is the second highest settlement classification (out of five categories) only to the ‘Mid-Suffolk Ipswich Fringe’.
- 1.3 To assist the Neighbourhood Planning process and housing delivery the JLP provides designated Neighbourhood Plan Areas with a minimum housing requirement to be delivered by a Neighbourhood Plan. At present, the JLP assigns 541 dwellings for delivery via the Eye Neighbourhood Plan. This process accords with the provision of paragraph 66 of the National Planning Policy Framework (NPPF) which requires the local planning authority to provide Neighbourhood Plan Areas with a housing need figure, even if this is an indicative figure.
- 1.4 Whilst it is acknowledged that the spatial strategy and housing figures assigned to settlement in the JLP are still to be confirmed and agreed through the Local Plan examination process, they do offer an indication of the potential minimum level of growth to be assigned to the highly sustainable settlement of Eye over the plan period. Accordingly, in order to significantly boost the supply of homes it is of critical importance that the Neighbourhood Plan acknowledges that the strategic minimum housing need requirements will be set by JLP and the town’s important position in the Mid-Suffolk Settlement Hierarchy.
- 1.5 At present the proposed site allocations in the Neighbourhood Plan are contended to be capable of delivering 519 dwellings, this figure is then topped up by a windfall allowance of

60 dwellings, thus giving a total figure of 579 dwellings. The 579 dwelling figure is not presented as a minimum number or requirement as per the JLP and paragraph 60 of the NPPF. As set out in our representations to Neighbourhood Plan Policies 4, 5, 6 and 7 my client has significant concerns regarding the deliverability of some of the proposed site allocations which need to come forward in order to deliver the housing needs target.

- 1.6 In its current form the Neighbourhood Plan does not meet Basic Condition A (having regard to national policies and advice contained in guidance by the Secretary of State) and Basic Condition E (general conformity with the strategic policies contained in the development plan) for preparing a Neighbourhood Plan. Paragraph 4.13 of the Plan concedes that the site allocations proposed through the Plan are not based on meeting a target number of homes. The Neighbourhood Plan also fails to acknowledge and build upon the emerging housing needs figures indicated in the Preferred Options JLP and does not state housing targets as a minimum.
- 1.7 The above stated concerns regarding the Plans minimum housing target and my client's concern regarding the deliverability of some of the proposed allocation indicate that there is a significant risk that the Neighbourhood Plan will fail to deliver the housing growth the town and the wider district needs, as such, the Plan will fail to significantly boost the supply of new homes in accordance with paragraph 59 of the NPPF.

What improvements or modifications would you suggest?

Paragraphs 4.13 should be deleted from the Plan. Paragraph 4.12a should be updated to state that Eye and in turn the Neighbourhood Plan has an important role to play in delivering the district's housing growth owing to the town's inherent sustainability as a location for new housing and position in the Settlement Hierarchy.

Policy Eye 1 should be updated to state the housing need figure for the town identified by the emerging JLP and all housing targets or site capacity figures in the Plan should be expressed as a minimum.

Concerns regarding the deliverability and evidence base underpinning proposed allocations is set out on other submitted forms.

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	<input checked="" type="checkbox"/>

Signed: Robert Barber	Dated: 4.7.19
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Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	4.14 and 4.15	Policy No.	Policy Eye 2
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

- 1.1 The affordable housing requirement in the adopted Mid-Suffolk Core Strategy is 35%, indeed, the Preferred Options Joint Local Plan (JLP) seeks to carry forward the 35% requirement for all developments of ten dwellings of more or those which exceed 0.5ha in area. Planning Practice Guidance makes it clear that strategic policies should set the requirement for affordable housing (Ref: Paragraph: 005 Reference ID: 41-005-20190509).
- 1.2 When read together Policy Eye 2: Form of Affordable Housing Provision, its associated supporting text (paragraph 4.14) and the affordable housing requirements/needs identified in site allocation policies (4, 5, 6 and 7) present a confusing and ultimately concerning picture in terms of affordable housing delivery.
- 1.3 Paragraph 4.14 states that the Neighbourhood Plan seeks to deliver 90 new affordable homes over the plan period. This 90-dwelling provision is accounted for by taking into account the committed 56 affordable dwellings at the Land South Eye Airfield allocation (subject of an outline planning approval) and by totalling the prescriptive requirements set out other site allocation policies all of which vary in percentage provision terms. It is also noted two of the proposed site allocations are not required to deliver affordable housing.
- 1.4 In simple terms based on the 579 dwelling figure stated in Policy Eye 1 the Neighbourhood Plan should be aiming to deliver 203 affordable dwellings (e.g. 35% of 579). It is acknowledged that the 203 target may not be met in full as the Land South of Eye Airfield allocation (Policy Eye 3) provided 20% affordable home due to scheme viability, however, it is clear from this simple calculation that the Neighbourhood Plan is not consistent with the prevailing strategic policies and is not aiming to deliver the affordable housing the town or wider district needs.
- 1.5 Paragraph 4.15 of the Neighbourhood Plan sets out percentage requirements for house types and sizes in new developments. These requirements are very prescriptive and are borne out of the Eye Housing Needs Assessment which does not appear to have assessed the viability implications of setting such an inflexible mix requirement. In addition, the percentage requirements do not distinguish between affordable and market housing needs or allow for any flexibility in meeting requirements at the planning application stage, as such, they are unlikely to be an effective in informing development proposals.
- 1.6 In light of the above it clear that the Neighbourhood Plan does not meet Basic Condition A (having regard to national policies and advice contained in guidance by the Secretary of State) and Basic Condition E (general conformity with the strategic policies contained in the development plan) for preparing a Neighbourhood Plan.

What improvements or modifications would you suggest?

The title of Policy Eye 2 should be amended to “Affordable Housing Provision”.

Policy Eye 2 should then be amended to state “*Subject to scheme viability considerations, site allocations will be required to provide affordable housing levels in accordance with the adopted strategic planning policies.*”

The reference to appropriate clustering of affordable provision within a scheme should be retained, but the maximum group should be 15-20 dwellings to allow for more flexibility at the design stage. Paragraphs 4.14 and 4.15 should be deleted.

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	x
The final ‘making’ (adoption) of the Eye NP by Mid Suffolk DC	x

Signed: Robert Barber	Dated: 4.7.19
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Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	4, 5, 6 and 7
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

1.1 As set out in my client's representations in respect of Policy Eye 1 we have significant concerns regarding the deliverability of some of the residential sites proposed for allocation in the Neighbourhood Plan. These concerns are based on our review of the published evidence base documents which support the Neighbourhood Plan. Table 1 sets out our observations regarding the proposed allocations at:

- Land north of Victoria Mills Allotments
- Victoria Mills Allotments
- Land at Eye Health Care and Hartismere Health and Care
- Paddock House, Church Street

Table 1

Site Details	Comments
<p>Land north of Victoria Mill Allotments - AECOM Ref: Site 3</p> <p>AECOM Site Capacity*: 38 dwellings</p> <p>Viability Assessment Capacity: 38 dwellings</p> <p>Proposed Allocation Capacity: 34</p>	<p>As noted in the AECOM Site Assessment document this site has no direct access to the highway network. Indeed, at present it is land-locked by the allotments, to the south, and agricultural fields to the north, east and west.</p> <p>Policy Eye 6 states that the site should deliver 19 market dwellings and 15 (44%) affordable dwellings. We note that the Housing Viability Assessment tested a scheme of 38 dwellings and found viability to be marginal at 35% affordable provision.</p> <p>Summary: At present, this is a highly constrained site as a site access cannot be achieved without other developments coming forward and facilitating a direct link to the highway network. Clarification is also required regarding site capacity and scheme viability.</p>

<p> dwellings (Policy Eye 6)</p>	<p>The site was assigned an amber rating in the AECOM Site Assessment document.</p>
<p>Victoria Mills Allotments - AECOM Ref: Site 4</p> <p>AECOM Site Capacity*: 39 dwellings</p> <p>Viability Assessment Capacity: 39 dwellings</p> <p>Proposed Allocation Capacity: 72 dwellings (Policy Eye 7)</p>	<p>Policy Eye 7 states that any development should provide 15 affordable dwellings, 12 market dwellings and 45 sheltered housing homes (total 72 dwellings). The Housing Viability Assessment and AECOM Site Assessment document states that this site has a capacity of 39 dwellings. The Housing Viability Assessment found scheme viability to be marginal at both 35% and 22.4% affordable housing.</p> <p>The only existing link from the site to the local highway network appears to be via a track off Castleton Way which serves the allotments. The AECOM Site Assessment states no constraints regarding site access, however, we consider that a safe and robust access could only be delivered via the approved development of 265 dwellings accessed from Castleton Way (Policy Eye 3).</p> <p>Without the provision of allotments elsewhere in the town this site will not come forward for delivery.</p> <p>Summary: At present, this is a highly constrained site as it has not been demonstrated that a site access can be achieved without other developments coming forward and facilitating a direct link to the highway network.</p> <p>Clarification is also required regarding site capacity and scheme viability.</p> <p>The site was assigned an amber rating in the AECOM Site Assessment document.</p>
<p>Land at Eye Health Care and Hartismere Health and Care - AECOM Ref: Site 11</p> <p>AECOM Site Capacity*: 55</p>	<p>The AECOM Site Assessment document states that the availability of this site is unknown and, as such, the site cannot be listed as an allocation in the Neighbourhood Plan. In light of these comments and the requirements of the NPPF regarding suitable and deliverable sites for housing we have significant concerns regarding the robustness of this proposed site allocation.</p>

<p>dwelling</p> <p>Viability Assessment Capacity: 23 dwelling</p> <p>Proposed Allocation Capacity: 43 dwelling (Policy Eye 4)</p>	<p>A significant proportion (the majority) of this site is brownfield land so that there is potential for any development to be subject to significant remediation and demolition costs. Policy Eye 4 requires 29 (67%) of the 43 proposed dwellings to be sheltered accommodation, as such, we have concerns regarding the ability to bring forward a viable development in line with the proposed mix requirements. Our concerns regarding viability would be equally applicable if some of the buildings on site were to be subject to conversion as stated in the AECOM Site Assessment document.</p> <p>We note the published Housing Viability Assessment found a scheme of 23 dwellings at this site to be unviable at 35% affordable housing provision and marginal/approaching viable at 22.4% affordable housing. The proposed allocation capacity (43 dwellings) and 67% sheltered accommodation was not tested in the viability assessment.</p> <p>Summary: This site is potentially unavailable according to the published evidence base documents. The mix of development set out in the Viability Assessment differs to that put forward for allocation in the Plan.</p> <p>The site was assigned a red rating in the AECOM Site Assessment document.</p>
<p>Paddock House, Church Street, Eye - AECOM Ref: Site 13</p> <p>AECOM Site Capacity*: 20 dwelling</p> <p>Viability Assessment Capacity: 17 dwelling</p> <p>Proposed Allocation Capacity: 12</p>	<p>Policy Eye 5 proposes to allocate the site for 12 dwellings of which 5 (41%) should be affordable dwellings. It is noted that the AECOM Site Assessment and SHELAA assessed the site as having a capacity of 20 dwellings.</p> <p>Page 25 of the Neighbourhood Plan Group's response to representations submitted at the pre-submission stage states that the District Council have ambitions to bring forward a high-density affordable housing scheme at the site.</p> <p>The Housing Viability Assessment assessed the site based on a yield of 23 dwellings and found the scheme to be viable providing 35% or 22.4% affordable housing. The scheme was not tested at 41% affordable housing.</p>

dwellings (Policy Eye 5)	<p>It is noted that that the AECOM Site Assessment documents states that the site is in a Conservation Area and located within close proximity to multiple listed buildings. Built heritage constraints are not referenced in the draft Policy.</p> <p>Summary: Clarification is required as to site capacity and the potential housing mix given the stated ambitions of the District Council.</p>
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*Source: Eye Town Neighbourhood Plan Site Assessment Final Report

- 1.2 The proposed allocations reviewed in Table 1 allocate 161 out of 519 dwellings put forward for allocation in the Plan (not including the 60 dwellings windfall allowance over the Plan period). This equates to approximately 31% of the total proposed dwellings. However, as explained in Table 1 and in the Plan’s evidence base there are significant doubts as to the whether the allocation at “Land Eye Health Care and Hartismere Health and Care” is deliverable. In addition, it is apparent from the published evidence base and our knowledge of the sites that deliverability of the Land north of Victoria Mill Allotments and Victoria Mills Allotments site is yet to be fully demonstrated.
- 1.3 Whilst we commend the Neighbourhood Plan in seeking to allocate suitable sites to deliver housing growth, based on the current evidence base there is a high potential for the above identified sites to not come forward or at the very least deliver dwellings at a rate different, or of a differing mix, to that set out in the policies of the Plan. Accordingly, the Neighbourhood Plan conflicts with Basic Condition A (having regard to national policies and advice contained in guidance by the Secretary of State) and Basic Condition E (general conformity with the strategic policies contained in the development plan) as it would fail to deliver strategic minimum housing need requirements set by the JLP and conflict with the objectives of the housing policies of the National Planning Policy Framework (NPPF). The NPPF also requires planning policy to be underpinned by relevant and robust evidence.

What improvements or modifications would you suggest?

These representations highlight concerns regarding four of the proposed site allocations which have a potential yield of 161 dwellings. Accordingly, the Neighbourhood Plan should be amended to promote the proposed reserve site allocation identified in Policy 8: Site South of Eye Airfield, Phase 2 to a full allocation. The Phase 2 site has a minimum yield of 174 dwellings (based on a density of 30 dph). Accordingly, there is clear synergy in the housing numbers for the Phase 2 site to play a vital role in housing delivery in the town should the delivery of proposed full allocations be delayed, which in our assessment is likely.

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	x
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	x

Signed: Robert Barber	Dated: 4.7.19
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Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	Policy Eye 8
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

- 1.1 My client supports the principle of Policy 8 which identifies the South of Airfield, Phase 2 site as a sustainable and suitable site for future residential development. However, as set explained in our representations to policies Eye 4, 5, 6 and 7 the Phase 2 site should be promoted to a full allocation in the Neighbourhood Plan owing to concerns regarding the deliverability of other proposed full site allocations and the need to plan for housing needs set out in the emerging Joint Local Plan. Indeed, the latter is required in order to significantly boost the supply of housing as set out in the National Planning Policy Framework (NPPF) and ensure the Neighbourhood Plan comes forward in support of the strategic Local Plan (NPPF, paragraph 13).
- 1.2 As demonstrated on the attached Capacity Plan, the Phase 2 site has a net developable area of 5.8ha and a site capacity of 203 at 35 dwellings per hectare and 174 at 30 dwellings per hectare. The total site area of the Phase 2 site is approximately 7.1ha. My client has previously secured outline planning permission for the Phase 1 Eye Airfield development (Policy Eye 3), as such, the technical work undertaken to date in and around this land confirms that a scheme can come forward at the site and that any on or off-site constraints can be appropriately addressed. Indeed, the land has been assigned reserve allocation status on this basis. A residential development at the Phase 2 site would provide a logical extension to the Phase 1 development and would link into the highway and utilities infrastructure delivered by the Phase 1 development.
- 1.3 If the Phase 2 site is not to be promoted to a full allocation my client seeks clarification in Policy 8 as to when the reserve site is able to come forward. At present, the Neighbourhood Plan does not make any provisions in planning policy which confirm the trigger/mechanism which releases the reserve site to come forward. It would be appropriate for the release of reserve site to be linked to any slippage in allocated sites coming forward as set out in

Table 4 (page 44) of the Plan or a fall in the district wide five-year housing land supply.

- 1.4 As currently drafted the policy requests that a landscaped area of public open space should be provided between the development and the Airfield Business Area. This area falls outside of the land identified for development on Figure 6, as such, this element of Policy 8 should be deleted. Notwithstanding this deletion, it is noted by my client that any development of the Phase 2 land is located adjacent to the extensive area of open space provision proposed through the Phase 1 development (Policy 3). Indeed, the Phase 1 development provided a significant overprovision of public open space.
- 1.5 Promoting the site to a full allocation and making the wording amendments to the policy (set out below) will ensure that the Neighbourhood Plan meets Basic Condition A (having regard to national policies and advice contained in guidance by the Secretary of State) and Basic Condition E (general conformity with the strategic policies contained in the development plan) as the Neighbourhood Plan will be proactively meeting housing growth needs set by the emerging Joint Local Plan.

What improvements or modifications would you suggest?

It is recommended Policy 8 is amended as follows. Proposed text is formatted bold and underline. Text to be deleted has been subject to strikethrough.

~~“POLICY EYE 8 – RESERVE SITE SOUTH OF EYE AIRFIELD, PHASE 2~~

~~Should further residential development be required before the end of the Plan period a reserve site of **Approximately 7.1 hectares of land (with a net developable area of 5.8ha)** is allocated **for residential development at the** South of Eye Airfield, **Phase 2 site**. ~~At 30 dwellings per hectare the site would provide about 174 dwellings.~~ **The site has a minimum site capacity of 174 dwellings if delivered at 30 dwellings per hectare. Development at 35 dwellings per hectare may be acceptable if it can be demonstrated such a density is appropriate through the planning application process.**~~

~~A landscaped public open space should be provided between the development and the Airfield Business Area.~~

Appropriate Archaeological Assessment, **as agreed with the County Archaeologist**, will be required prior to the granting of planning permission.

~~The proportion of affordable/sheltered housing and the house types required should be assessed based on an updated Housing Needs Assessment closer to the start of development~~ **come forward in accordance with the prevailing adopted strategic policies, unless viability testing indicates otherwise.**

~~Electric Vehicle Charging should be provided in accordance with Policy Eye 30.”~~

If the reserve site status is retained by the Inspector, the policy should be amended to include a clear trigger/mechanism to allow the Phase 2 land to come forward and read as follows:

“POLICY EYE 8 – RESERVE SITE SOUTH OF EYE AIRFIELD, PHASE 2

“Approximately 7.1 hectares of land (with a net developable area of 5.8ha) is a reserve allocation for residential development at the South of Eye Airfield, Phase 2 site. Should housing completions slip from the rate identified in Table 4 of this Plan this site will be released for development from its reserve status and should be treated as a full allocation in the determination of a planning application.

The site has a minimum site capacity of 174 dwellings if delivered at 30 dwellings per hectare. Development at 35 dwellings per hectare may be acceptable if it can be demonstrated such a density is appropriate through the planning application process. Appropriate Archaeological Assessment, as agreed with the County Archaeologist, will be required prior to the granting of planning permission.

The proportion of affordable/sheltered housing and the house types required should come forward in accordance with the prevailing adopted strategic policies, unless viability testing indicates otherwise.

Electric Vehicle Charging should be provided in accordance with Policy Eye 30.”

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

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Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	x
The final ‘making’ (adoption) of the Eye NP by Mid Suffolk DC	x

Signed: Robert Barber

Dated: 4.7.19



KEY

 POLICY EYE 8 - PHASE 2 INDICATIVE RESIDENTIAL PARCELS

 POTENTIAL POINTS OF VEHICULAR ACCESS

PARCEL A - 2HA
60 DWELLINGS @ 30DPH
70 DWELLINGS @ 35DPH

PARCEL B - 2HA
60 DWELLINGS @ 30DPH
70 DWELLINGS @ 35DPH

PARCEL C - 1.8HA
54 DWELLINGS @ 30DPH
63 DWELLINGS @ 35DPH

TOTAL -
174 DWELLINGS @ 30DPH
203 DWELLINGS @ 35DPH

LAND SOUTH OF EYE AIRFIELD, PHASE 2 - CAPACITY PLAN



Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Para 4.37	Policy No.	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

- 1.1 In light of our concerns regarding availability of some of the proposed residential site allocations (see my client's representations to policies 4, 5, 6 and 7) it is strongly recommended that my client's land to the north and south of Castleton Way and west of Victoria Hill is allocated for residential development in the Neighbourhood Plan or as minimum be identified as 'Reserve Site' in planning policy. This additional land is identified on the Site Location Plan.
- 1.2 The additional land measures approximately 35.6 ha in area and was promoted for development through the Mid-Suffolk DC Strategic Housing and Economic Land Availability Assessment (SHELAA) (2017) and previous Neighbourhood Plan consultations. The development of this land for housing will provide a logical extension to the town following the completion of the South of Eye Airfield Phase 1 and Phase 2 developments. When taking into account the presence of HSE Safeguarding Zones the developable land to the north of the Castleton Way has an area of 8.3ha. The land to the south of Castleton Way has a developable area of 5.5ha.
- 1.3 The additional land promoted by our client has been divided into three separate land parcels (Sites 2, 5 and 6) in the AECOM Site Assessment document. Set out below are comments on the AECOM site assessment:

Table 1

Site and AECOM Assessment (Table 4.1)	Our Response
AECOM Site 2: This site forms part of the proposed 'Reserve Allocation' site and further agricultural land to the south and west.	The proposed allocation at Land south of Eye Airfield (Site 12) which currently benefits from outline planning permission will be delivered in line with the phasing identified at Table 4 of the Plan. The land within the Site 2 area, adjacent to the north/west boundary of Site 12, has been identified as 'Reserve Allocation' for 174 dwellings.
The site has been assigned an amber rating, in the AECOM	The presence of these two proposed allocations demonstrate that the remainder of land within the Site 2 area will not be

<p>document as it is seen as an isolated location for housing without the delivery of the approved development at Land south of Eye Airfield.</p> <p>The site assessment also identifies potential constraints presented by HSE consultation/safety zones.</p> <p>The site assessment concludes that the land to the south within the site, which falls outside of the HSE consultation zone, could be allocated for 360 dwellings.</p>	<p>isolated from the rest of the town, but instead form a logical and sustainable extension to the town.</p> <p>We support the conclusions of AECOM in that subject to positively addressing the HSE consultation zones, which is in our assessment is readily achievable, the site should be allocated for residential development.</p> <p>Summary: In our assessment of the evidence supporting the Neighbourhood Plan, the remainder Site 2, not included in the ‘Reserve Allocation’, is more deliverable and sustainable than other sites proposed for full allocation in the draft Plan.</p>
<p>AECOM Site 5 and 6: Table 3.3 states that Eye Town Council consider Sites 5 and 6 to be a single site; and comments that both sites, if developed, would be isolated.</p> <p>In addition, Table 3.3 also states that development of Site 6 would significantly reduce the gap between Eye and Yaxley.</p> <p>On the basis of the above comments both sites were not subject to further detailed assessment by AECOM in Table 4.1.</p>	<p>Site 5 is located adjacent to the boundary of Hartismere High School. These facilities by their very nature are at the heart of the local community. The development of Site 12 (subject of an outline planning approval - Policy Eye 3) for housing will introduce new built form north of Castleton Road and new highway infrastructure to enhance the wider connectivity of Sites 5 and 6.</p> <p>Figure 3.1 of the AECOM Site Assessment document identifies all sites that have been assessed in some form by AECOM and the Town Council. The site area mapped for Site 6 is incorrect and does not align with the site area promoted by our client via the SHELAA and the Neighbourhood Plan. Figure 3.1 shows Site 6 to be extending approximately 350 meters further west along Castleton Way. Indeed, the total area of the land incorrectly included within Site 6 measures approximately 12ha.</p> <p>When mapped correctly, it is apparent that Site 6 would not extend to the west, beyond the site boundary of Site 2 to the north of Castleton Road. Site 2 has attracted no criticism in respect of it extending towards Yaxley in a detrimental manner.</p> <p>The comment, in the AECOM document and at paragraph 4.37 of the Neighbourhood Plan, that the development of Site 6 would significantly reduce the gap between Eye and Yaxley is not justified and furthermore has been made on the basis of incorrect mapping.</p>

Summary: In light of the above, we contend that the assessment of Sites 5 and 6 is flawed and the sites have been unduly discounted from the selection process. The delivery of my client's land to the south of Castleton Way would not reduce the gap between Eye and Yaxley, beyond what is proposed through the allocation of land to the north of Castleton Way.

On the delivery of the Phase 1 and Phase 2 South of Eye Airfield sites the land at Sites 5 and 6 would not be isolated, indeed it would be adjacent to residential development (to the north of Castleton Way) and Hartismere School. In this regard Policy Eye 27 of the Plan is also noted which sets an aspiration to provide a footpath and cycleway around the western and southern boundary of my client's land, thus the accessibility of this land is set to be enhanced by the Neighbourhood Plan. This adds further logic to our argument that the land will not be an isolated location for new development.

Policy Eye 13 (which my client opposes in its current form) seeks to allocate Site 5 as land for a primary school, this aspiration further indicates that the land is not isolated from the rest of the town when taking into account the housing growth to the north of Castleton Way and the location of the existing High School. Policy 13 is not deliverable without the allocation of enabling residential development at the additional land to the north and south of Castleton Way.

1.4 Paragraph 31 of the National Planning Policy Framework (NPPF) requires all policies to be underpinned by relevant and up to date evidence. Table 1 demonstrates that, in respect of Sites 5 and 6, there have been several flaws in the Site Assessment process which has resulted in Sites 5 and 6 being wrongly discounted at an early stage of the assessment process without a thorough site assessment taking place. Indeed, this flawed assessment has informed the text at paragraph 4.37 of the Plan and its associated table.

1.5 Basic Condition A requires a Neighbourhood Plan to have regard to national planning policies and guidance. The NPPF and National Planning Policy Guidance (NPPG) place great emphasis on the importance of achieving sustainable development with paragraph 7 of the NPPF identifying that the purpose of the planning system is to contribute to the achievement of sustainable development. Indeed, achieving sustainable development is also Basic Condition D in preparing a Neighbourhood Plan.

1.6 The land to the north and south of Castleton Way is suitable, sustainable and deliverable in respect of residential development and would assist the Neighbourhood Plan in delivering housing growth in a manner which would meet objectives of sustainable development.

1.7 The decision not to allocate my client's land has not taken into account the benefits of delivering sustainable development in accordance with Paragraphs 7, 8 and 9 of the NPPF. In light of the above the Neighbourhood Plan conflicts with Basic Conditions A and D as it would not result in the most sustainable and deliverable land being allocated for new housing in Eye. This would be a clear conflict with the policies of the NPPF and the need to deliver sustainable development

What improvements or modifications would you suggest?

Given the concerns regarding the deliverability of some of the proposed allocations, the need to promote the current reserve allocation (Policy 8) to a full allocation and the above concerns regarding the site selection process; the additional land to the north and south of Castleton Way, either in full or in part, should be considered for full allocation or as a minimum given 'reserve allocation' status in the Eye Neighbourhood Plan.

Making the above described amendments to the Plan will ensure that the Neighbourhood Plan delivers the growth afforded to the town by the emerging Joint Local Plan and allows for flexibility in the strategy to manage the growth of the town should proposed allocations not come forward for development as set out in the draft Plan.

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

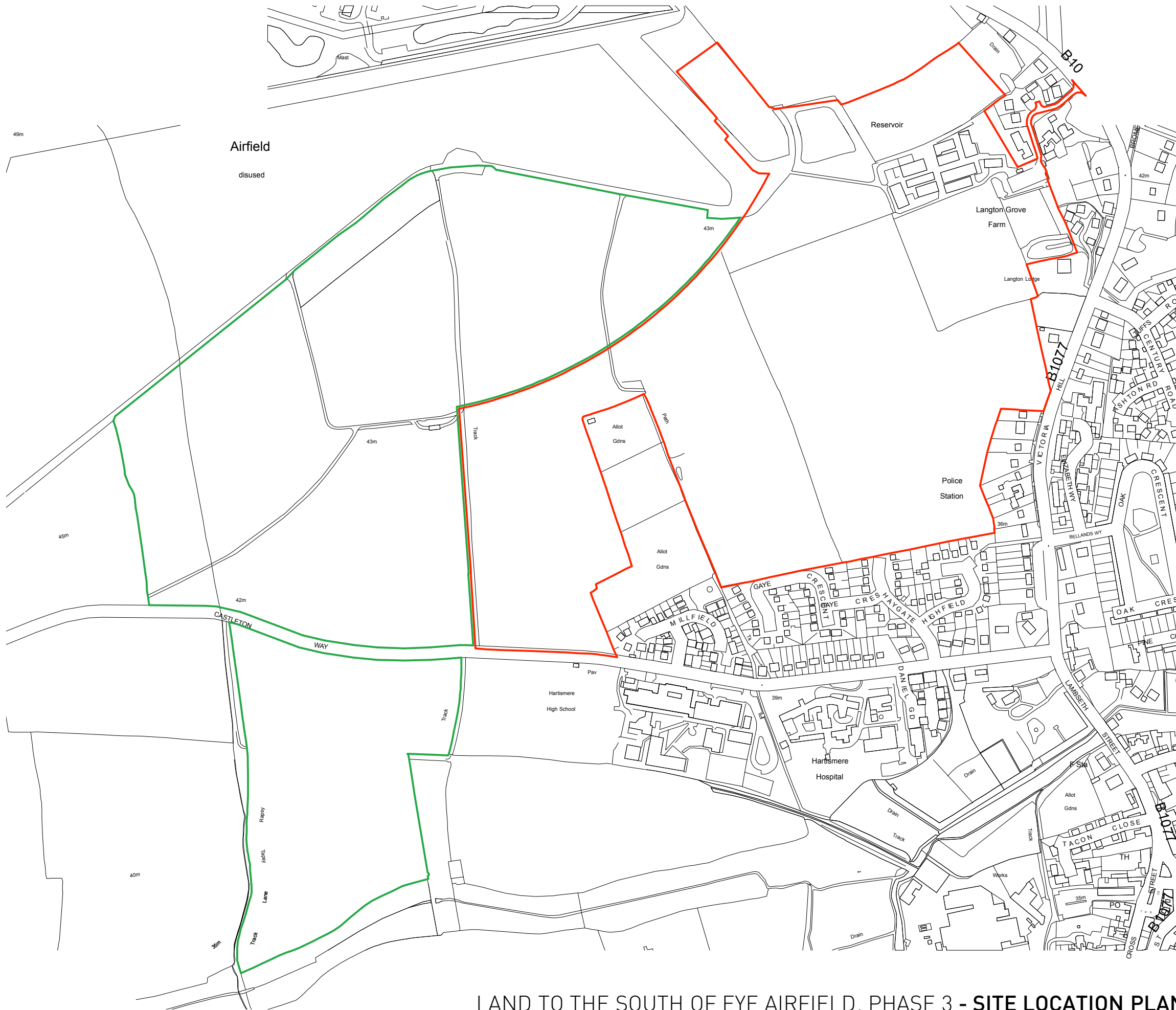
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Please indicate (tick) whether you wish to be notified of:

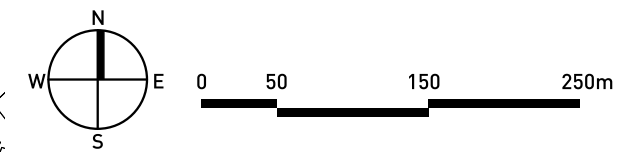
The publication of the recommendations of the Examiner	x
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	x

Signed: Robert Barber	Dated: 4.7.19
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- KEY**
- SITE LOCATION OF PHASES 1 & 2
 - SITE LOCATION OF PHASE 3
NET DEVELOPABLE AREA:
- 8.3HA NORTH OF CASTLETON WAY
- 5.5HA SOUTH OF CASTLETON WAY



LAND TO THE SOUTH OF EYE AIRFIELD, PHASE 3 - SITE LOCATION PLAN



Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	Eye 12
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

The land identified by Policy Eye 12 and Figure 9 is under the control of our client. As per our previous discussions with the Town Council our client supports the proposed allocation of this land for a crematorium.

What improvements or modifications would you suggest?

n/a

If you are including additional pages these should be clearly labelled and referenced.

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I consider that a hearing should be held because ...

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	x
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	x

Signed: Robert Barber

Dated: 4.7.19

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	6.11-6.12	Policy No.	Policy Eye 13
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

- 1.1 In principle, our client supports the need to ensure that the capacity of education infrastructure in the town increases to respond to and support housing growth. Given the proposed development at Land south of Eye Airfield, the location of the proposed 'reserve site for a primary school' adjacent to Hartismere High School is a logical location for any new primary school, should the need for a new facility arise.
- 1.2 Notwithstanding the above, the proposed 'reserve site for a primary school' falls within land currently under the control of my client which continues to be promoted for residential development through the Joint Local Plan and Neighbourhood Plan. Policy 13 conflicts with the ambitions of my client and the release of this land for a new primary school is not possible without some enabling residential development being allocated on adjacent land to the south and west.
- 1.3 Paragraph 16b of the National Planning Policy Framework requires Plans to be aspirational but deliverable. At present, without engagement with my client and the allocation of enabling development Policy 13 is undeliverable. Accordingly, Basic Condition A for preparing a Neighbourhood Plan (having regard to national policies and advice contained in guidance by the Secretary of State) is not met.

What improvements or modifications would you suggest?

Unless enabling residential development is allocated to the south and west of the 'reserve site for a primary school' it is recommended that Policy 13, Figure 10 and paragraphs 6.11-6.12 are deleted from the Plan.

If you are including additional pages these should be clearly labelled and referenced.

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Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	x
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	x

Signed: Robert Barber	Dated: 4.7.19
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(E-19) T W Gaze (obo Church Farm)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr Edward Baskerville
Job Title (if applicable):	Chartered Surveyor
Organisation / Company (if applicable):	TWGaze
Address:	10 Market Hill Diss Norfolk
Postcode:	IP22 4WJ
Tel No:	01379651931
E-mail:	e.baskerville@twgaze.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Peter, Sylvia and Andrew West
Address:	Church Farm Brome Diss Norfolk
Postcode:	IP23 8AH
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Policy No.	Eye 1, 15 and 20
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

We consider that there are fundamental issues with the housing strategy and site allocation selection process with at least three of the sites proposed to be allocated under Policy Eye 1 a (ii), (iii) and (vi) are neither realistic nor achievable in their current form.

The Site Assessment document does not provide specific evidence from landowners to establish that the sites are available for development. We do not consider that there is sufficient evidence on suitability, availability and deliverability of the sites at the scale that they are proposed to be allocated for.

We also have concerns over how the sites have been considered and the consistency within the overall assessment of the sites and those that have been discounted. Site 1a land to the north of Maple Way, for example, is discounted on the basis of 'the site is within a Special Landscape Area and access via Maple Way and Bellands Way is very poor.' However, the site assessment concludes that the site is suitable for development and Policy Eye 17 Special Landscape Areas allows for development that does not adversely affect the area and effects can be mitigated against.

It is difficult to comprehend how the Neighbourhood Plan can be brought forward without an up-to date housing requirement for the District and an up-to date housing distribution strategy to take account of.

Policy Eye 15 does not comply with the requirements of the NPPF in particular paragraphs 77 and 78 or indeed the presumption in favour of sustainable development. Policy Eye 20 designates Victoria Hill Allotments as a Local Green Space and protects it from development whilst also allocating the allotments for the development of 72 homes.

In summary we do not consider that Eye Neighbourhood Plan meets the basic conditions and we urge the Council and/or the Independent Examiner to reconsider the compliance with the NPPF and therefore the basic conditions test of the Eye Neighbourhood Plan.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	

Signed: Edward Baskerville

Dated: 5th July 2019

(E-20) 490th Bomb Group Eye Airfield Heritage Group

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mrs Jacqueline Aling
Job Title (if applicable):	Administrator
Organisation / Company (if applicable):	490 th BG (H) Eye Airfield Heritage group
Address:	c/o 4 Langton Green Eye
Postcode:	IP23 7HL
Tel No:	
E-mail:	490thmemorial@gmail.com

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	Eye 1 - Housing
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support x Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

Limited housing at this point is a positive move I would like to comment that car parking spaces should be kept within reason as the area would support a cycle/foot path. The implementation of an area of grass around the path perhaps as a small recreation area suitable for very young children would be an asset. While I accept that the majority of residents of Eye are over 60 nevertheless unless we accommodate young residents to stay the town will surely diminish over time.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

- 1, Ensure all new builds have garage space.
- 2, Limited public parking perhaps for allocation or lease to local residents.
- 3, grass area between houses and parking perhaps following the 'village green' concept
- 4, small play area

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...
<i>No need</i> <i>(Continue on separate sheet if necessary)</i>

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	X

Signed:	Dated:[31.05.2019]
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(E-21) Bailey (Resident)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent, please complete Part's A & B

Part A: Respondent	
Title / Name:	Mrs S Bailey
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Eye
Postcode:	
Tel No:	
E-mail:	Redacted

Section Two: Your representation(s) consultation doc May 2019

Page.	Paragraph ref	1.15 and general comments
15		

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support **Support with modifications** Oppose Have Comments

GENERAL COMMENTS including statistics on P31

The airfield does provide a tremendous opportunity for small business expansion and housing but the size of the Housing development is highly controversial given Eye is a small Historic town with a population of under 3,000. In your proposal Eye is included into the same category as Stowmarket (20,000) or Hadleigh (8,000) These are large towns and shouldn't be compared to Eye.

Of great concern is what provision is being made for traffic flow from A140 at both junctions into Eye B 1117 and B 1077 – A140 already a dangerous and congested road. Any expansion will increase flow of traffic both domestic and commercial.

Restrictions should be imposed to prevent large trucks using the centre of the town as a short-cut and causing damage to fabric of the buildings.

Will provision be made for recycling facilities/bottle banks etc at the site of new housing. Current facilities in town car park overstretched and being abused by "Tippers"

Local talk has it that the architect who put forward the original proposal for Paddock house never even visited the site (There was local opposition against his original plans) but can we hope real thought, not just vision by architects/planners at desks has been made for the future of Eye

Your very long Development plan is comprehensive but it is too long/complicated and requires more clarity. For example You list number of houses per hectare but impossible to visualise if you aren't familiar with housing projects. It must be hoped that the Developers won't be cramming as many houses

as they can into small spaces; that landscaping/ green areas will be a priority

Section Two: Your representation – consultation doc May 2019

page No.	Vision statement P25	Paragraph No.	3.1
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Unrealistic to propose that Eye will become a walkable town. No one from the airfield is going to be walking into the heritage (current) town. The development will create a satellite town on the outskirts of Eye. For all the vision developers/planners may have this will generate two communities.

Section Two: Your representation – consultation doc May 2019

page No.	36 Hartismere hospital	Paragraph No.	4.19
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

There is no mention about where new medical centre will be located; nor if it will improve and offer comprehensive facilities (x ray/minor injury services) to alleviate pressure on local hospitals and increase in number of well qualified doctors and nurses.

The under use of the Hartismere “hospital” has long been a bone of contention given the tax payer funded its renovation since when it has been largely empty and good services (Back injury clinic) were driven away by increased costs imposed by MSCC

Section Two: Your representation – consultation doc May 2019

page No.37	Existing Chicken factory site	Paragraph No.	4.21
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

The number of homes proposed on this site (79) is far too many for the centre of the town. Although it is also proposed to provide parking this will be insufficient and traffic will also cause problems in the centre of the old part of town

Section Two: Your representation – consultation doc May 2019

page No.	57 – Crematorium	Paragraph No.	Site 7
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications **Oppose** Have Comments

The Statisticians have highlighted the lack of Crematorium in the region but building a crematorium so close to the town is a horrific idea. I really hope I am not alone in strongly opposing this proposal.

Section Two: Your representation – consultation doc May 2019

page No.	62	Paragraph No.	Sports facilities
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Of course there MUST be sports and recreational facilities created as part of the Airfield development and importantly Youth Centres and places for children and young people to enjoy activities both supervised and unsupervised. The current lack of facilities is shocking for a growing population.

Section Two: Your representation – consultation doc May 2019

General comments

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

There is no mention of how infrastructure will manage this new expansion. Given scant rainfall in this part of the country where does the water come from to cope with the demand of hundreds more people using/needng water – and how does demand manage the upkeep of green spaces the developers propose to create?

Who is paying for the increased need for medical facilities/schools and other Services (the tax payer- us, or the Developer)?

It's unrealistic to assume that people living outside the centre of EYE will shop in the Old town. Existing shops will be unable to manage an increase in demand. Is it intended to develop a shopping area on the airfield (there is no mention of this).

How does a post office in a newsagent manage the increase in demand?

Section One: Your Details

addendum
28 June 2019

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mrs. Sabina Bailey
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	<p><u>MSDC NOTE</u></p> <p>This representation was sent by post only on 1st July and appears to have been received on or before Fri 5 July 2019 (Paul Bryant - BMSEK)</p>
Postcode:	
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Pre submission draft document	Paddock House Policy No 6	Page number	39
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications ~~Oppose~~ Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

Your policy document states a mix of affordable housing and market housing. Your planners are cramming too many houses in what is the Heritage part of town and I understand there is talk of increasing the number of housing and removing the green space on the frontage of Church Street. I am not alone in opposing this part of the overall project. The Heritage (conservation) part of Eye should be preserved as Heritage and should be used sensitively and not used for a development of a mass of housing. A number of us have very strong opinions on this



(E-22) Hazlewood (Resident)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Dr Geoffrey & Mrs Diana Hazlewood
Job Title (if applicable):	Retired (both)
Organisation / Company (if applicable):	
Address:	Eye Suffolk
Postcode:	
Tel No:	██████████
E-mail:	████████████████████

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	The Entire Plan	Policy No.	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

We believe this is a well-considered and comprehensive blueprint that will guide the growth and development of the town of Eye over the period to 2036, based on what we know today. The underlying vision captures precisely what we think the town should aspire to in the future. The plan responds fully to the views expressed by residents during numerous meetings and consultations. It includes convincing evidence to support the conclusions reached. It acknowledges fully the need for the Town to grow and outlines how this can be achieved sympathetically, in a measured fashion, ensuring the provision of an appropriate mix of housing to meet all needs, while also developing services and facilities in parallel.

We particularly like the fact that the plan identifies and validates sustainable sites for new housing, and that the sites are sufficient to meet and very probably exceed all credible estimates of future needs. We also approve of the proposal to utilise Paddock House; it has stood empty for too long and is an eyesore.

We also support the idea of locating a new Food Retail outlet in the centre of Eye. There is no doubt that this will be needed as the Town grows. Re-purposing the site occupied by the Poultry Processing business is long overdue and will go some way to improving the appearance and feel of the Town centre.

What improvements or modifications would you suggest?

We have no suggestions for major improvements or modifications at this stage. It is likely that a plan made today will require some modifications and changes during the planning period to 2036, but as it stands we approve it as a very good blueprint for the immediate future. It seems likely that the question of traffic management may need to be revisited as the Town grows and the Airfield is further developed as a business park

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

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Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Having been fully consulted on the content of the Plan, we don't consider that a hearing is necessary.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	Yes
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	Yes

Signed: Geoffrey & Diana Hazlewood

Dated: June 5th 2019

(E-23) Smith (Resident)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mark Smith
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	Eye, Suffolk
Postcode:	████████
Tel No:	██████████████████
E-mail:	██████████████████████████████

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	4.26 – 4.29	Policy No.	6, 7 and 8
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications **Oppose** Have Comments

Please give details of your reasons for support / opposition, or make other comments here:

Oppose – (sorry - it doesn't seem possible to insert a tick in the boxes above)
Also note – the Policy Numbers seem to have changed between the Draft Submission that was available for consultation and the version later submitted to the District Council

I don't propose to justify the retention of allotments as an important asset for the Town. The positive arguments for health and well-being are well known and the Council acknowledges that a suitable alternative will need to be provided. I simply object to the inclusion of the policies following widespread opposition to the proposals.

Initial drop in sessions on the Neighbourhood Plan seem to indicate a positive response to the use of the allotments land for housing. See, for example, the data given in Supporting Document 4 (Page 8) where it is claimed that 56 people thought the site should be used, but 19 were against. This, however, is an assertion based on the anecdotal evidence of those present, since requests to view the data under the Freedom of Information Act have been refused on the grounds that written evidence has not been retained. There would therefore seem to be no way of verifying this evidence and it should not have been included in the supporting document.

After drop-in sessions were held, allotment holders were informed that we could discuss proposals to develop the allotment land, which had previously been denied in minuted Town Council meetings, at a meeting in the Town Hall in September 2018. Over 50 interested parties attended and it was made very clear that universal disapproval of the proposal to use the land for housing existed. Indeed, no one in the audience expressed any support at all and most wished to retain the allotments on the current site.

Nevertheless, proposals to develop were included in the Draft Plan.

Comments on the Draft Neighbourhood Plan were then requested as part of the Local Consultation that took place in October and November 2018 and these are included in Supporting Document 20. Those relevant to the potential use of the Victoria Mill Allotments are to be found on pages 26 – 33.

It should be noted that by far the majority of the comments are expressing opposition to the proposals. Those that express approval come largely from members of the Neighbourhood Plan Development Committee, perhaps not surprisingly. You will also note that of those comments expressing opposition, none have been accepted, whereas all those in favour have received enthusiastic endorsement. A verbal enquiry at a Town Council meeting (hopefully minuted!) revealed that acceptance or rejection of the comments was carried out by the chairman of the Neighbourhood Plan Development Committee alone and was not subject to discussion within the committee or with the Town Council, on whose behalf the Plan was being developed.

In my opinion, if a Neighbourhood Plan committee, after consultation, receives written comments, these in turn deserve to receive full acknowledgement and be subject to discussion by the committee, or preferably, by the full Council. A single chairperson, who has often voiced his own public opinion in support of the validity of a proposed policy, should not be the sole arbiter as to whether those comments are valid or not.

I seems to me that the way in which the comments in the Supporting Documents are presented has resulted from a profoundly undemocratic handling of those comments and as such, casts doubt on the good faith of the Council to review proposals in the light of opinions received.

I would therefore request that you re-examine the supporting documents and to verify from the Town Council that correct procedures have been followed in which due consideration of the views of the correspondents have been given.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Ideally, for the Town Council to acknowledge that sufficient opposition exists to Policies 6 and 7 as to merit their exclusion from the final Plan.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

...I believe that there are sufficient grounds to hold the Council to account for the way that the proposed issue of using the allotment land for housing has been handled. Initial meetings have been held in camera, resulting in little information reaching plot holders until after decisions have been taken and implemented. In addition, serious mistakes have been made in presentations to the Secretary of State and the National Allotment Society for approval to use Statutory Allotment land for housing. Now we have written opposition to the proposals being totally ignored.

I don't feel that the issue has been conducted in an open and democratic manner.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner	Yes
The final 'making' (adoption) of the Eye NP by Mid Suffolk DC	Yes

Signed: Mark Smith	Dated: 10/06/2019
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(Not possible to sign if completing the submission as a Word document!)