

Mid Suffolk District Council



Fressingfield Neighbourhood Development Plan

Submission Consultation Responses

In July 2019 Fressingfield Parish 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 Monday 5 August until Friday 27 September 2019.

In total, 13 organisations submitted representations. They are listed below and copies of their representations are attached.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Natural England
(3)	Historic England
(4)	Environment Agency
(5)	National Grid
(6)	Suffolk Preservation Society
(7)	SAFE (Supporters Against Fressingfield Expansion)
(8)	Castro (Resident)
(9)	Maydon (Resident)
(10)	Wolfe (Resident)
(11)	C E Davidson Ltd
(12)	NWA Planning Ltd
(13)	Gladman Developments Ltd

(1) Suffolk County Council

Date: 27th September 2019
Enquiries to: Cameron Clow
Tel: 01473 260171
Email: cameron.clow@suffolk.gov.uk



Dear Robert Hobbs,

Submission Version of the Fressingfield Neighbourhood Plan

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

The county council is supportive of the Parish Council's vision for the Parish, however in reviewing the plan and consultation statement it became apparent that the County Council's response to the regulation 14 consultation was not received by the parish council. This is unfortunate, however the response of the parish and district councils when this was raised has been positive, which is very much appreciated.

There are two particular issues where the county council disagrees with recommendations made by Mid Suffolk District Council, which have since been incorporated into the plan; flood risk and drainage and highway safety. These comments have been made in discussion with the district and parish councils.

This response will focus on the Basic Conditions the plan must satisfy in order to proceed to referendum. These are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State;
- b) the plan contributes to the achievement of sustainable development;
- c) the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority
- d) the neighbourhood plan does not breach, or is compatible with EU obligations

Where an amendment has been suggested in, deleted text will be shown in ~~strikethrough~~ and added text will be shown in *italics*.

Flooding

Flooding and water management was one of the key policy areas that SCC made recommendations at the regulation 14 consultation stage. The plan shows awareness of the flooding issues around the Anglian Water foul water sewer system which can become overwhelmed during high rainfall events. The county council supports Objective 9 of the plan to prevent the increase of and reduce existing risk of flooding.

As background, SCC's reg. 14 response also provided some information on the local water environment and ground conditions in Fressingfield which can be read in appendix 1. It is noted that the district council made recommendations to amend the wording of policy FRES 11, which have been incorporated into the neighbourhood plan. While it is recognised that these recommendations were well intentioned, as the Lead Local Flood Authority SCC has some concerns around the effectiveness and clarity of this policy and does not consider the policy to meet the Basic Conditions.

The first sentence of this policy states that development should include rainwater capture and grey water recycling. While this is supported in principle these are not flood mitigation measures or drainage solutions, they are resource sustainability solutions and so not suitable to include in this policy. Removing this requirement from policy FRES 11 would not be of detriment to the plan, as these requirements are also in policy FRES 12, and place the focus of this policy on flooding and drainage issues, improving clarity.

The first sentence also states development should "reduce flow discharge from the site by 10%". While SCC support policy to require development to mitigate its own impacts and that development reducing existing flood risk is appropriate in Fressingfield, but this element of the policy is not sufficiently clear and does not have evidence to support the specific 10% figure. To clarify the policy, it should require that development achieve a runoff rate lower than the existing greenfield rate. The 10% figure should be removed as site specific evidence (such as a Flood Risk Assessment) will determine the most appropriate drainage measures and the ability of a site to reduce existing flood risk.

The second sentence of the policy does not meet Basic Condition of having consideration for national policy. NPPF paragraph 165 states "Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate." The policy instead uses the term "unviable". There is a difference between the terms "inappropriate" and "unviable". Unviable indicates financial reasons, whereas inappropriate means the circumstances of the site do not lend to the use of SUDS (for example a site could be contaminated). The county council's concern is that the whole principle of surface water management through SUDS would be set against viability. This would not address the clear need for development to incorporate SUDS as required by national policy. It is recommended this sentence is deleted.

The third sentence of the policy is supported however could be more concise, stating simply that "development shall not be supported in areas of significant flood risk".

For these reasons the county council recommends that the first paragraph of policy FRES 11 is replaced with the suggested text below.

All new development (including minor development) is required to use appropriate sustainable drainage systems to mitigate its own flooding and drainage impacts, avoid increase of flooding elsewhere and seek to achieve lower than greenfield runoff rates. No development will be supported in areas of significant flood risk.

As with the regulation 14 response, flood maps accompany this letter. These maps indicate areas of flood risk and locations of specific flood events. Policy FRES 11 also identifies areas of particular concern to the local community. For completeness Laxfield road should be added to this list as the SCC flood maps highlight a cluster of flood events along this street. It is recommended the SCC flood maps are included as part of the plan evidence base.

Transport

Policy FRES 10

Part k of the policy refer to “sufficient” parking without defining what sufficient means. Mid Suffolk District Council have adopted the Suffolk Guidance for Parking (updated 2015)¹. In order to improve the clarity of this policy reference should be made to the guidance within policy or explanatory text.

Policy FRES 15

The redrafted version of this policy is not supported as it does not meet the Basic Conditions. The regulation 14 consultation draft of the plan supported proposals which included safe and attractive pedestrian access and proposals which would improve walking and cycling levels in the neighbourhood plan area which the county council supported.

The inclusion of the phrase “unless it can be demonstrated to be impractical” in the submission version of the plan does meet the Basic Conditions of having regard to national planning policy or contributing to the achievement of sustainable development. NPPF paragraph 110 states that “development should... give first priority to pedestrian and cycle movements both within the scheme and neighbouring areas.” And paragraph 91 states that “planning policies and decision should aim to achieve health, inclusive and safe places which... enable and support healthy lifestyles...”

As currently worded the policy could allow for development that does have a pedestrian and cycle access to the existing village, which is not compatible with the national policy stated above. Where there are no walking or cycling routes available means residents in new communities will not have the opportunity to use these modes of travel and benefit from the positives to health and wellbeing they can provide. By necessity they will likely use private cars, which is less sustainable. This is also counter to emerging district policies in the Babergh and Mid Suffolk Joint Local Plan which states development should create “walkable neighbourhoods”.

To meet the basic conditions amendments to the policy are recommended below.

All new developments shall take opportunities to provide safe and attractive pedestrian and cycle links that connect to existing networks appropriate to the scale and location of the development and seek to improve levels of walking and cycling in the Neighbourhood Plan area. ~~unless it can be demonstrated to be impractical~~

The second paragraph of the policy also does not have consideration to national policy as it appears to set a more strict test for regarding highway network function and safety. Paragraph 109 of the NPPF states that development should only be refused on highway ground of the impacts or residual cumulative impacts are “severe”. This policy sets a standard of no increase to traffic flows, which is not possible. Development, particularly in a rural setting where car ownership tends to be high, will lead to an increase in traffic, however this in itself is not a reason to refuse a planning application. It is appropriate that the policy requires development to mitigate it’s impact as much as possible relative to the scale of the development. It is recommended that the policy is amended to state:

All new developments shall take opportunities to provide safe and attractive pedestrian and cycle links that connect to existing networks appropriate to the scale and location of the development and seek to improve levels of walking and cycling in the Neighbourhood Plan area.

Health and Wellbeing

Joint Suffolk Health and Wellbeing Strategy

¹ <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/>

NPPF paragraph 92 states that planning policies should “take into account and support the delivery of local strategies to improve health, social, and cultural wellbeing for all sections of the community”. SCC, as part of the Suffolk Health and Wellbeing Board has recently refreshed the Joint Suffolk Health and Wellbeing Strategy which encourages a “health in all policies approach”, to incorporate health considerations into decision making across a variety of areas.

Planning is able to affect health and wellbeing and it is welcome that the Neighbourhood Plan mentions health throughout.

SCC would encourage that the plan makes reference to the Joint Suffolk Health and Wellbeing Strategy and recognises the potential links between the this and the plan.

The strategy is currently in the process of being refreshed and updated, however an overview of current priorities can be found here <https://www.healthysuffolk.org.uk/uploads/Joint-Health-and-Wellbeing-Strategy-for-2016-2019.pdf>

Specialist Accommodation for Older People

SCC supports the policy FRES 2, which states that development should provide housing for older people. The Suffolk Joint Strategic Needs Assessment (JSNA) Healthy Aging Needs Assessment published in July 2018 highlighted that the proportion of the population over 65 will significantly increase over the next 20 years², as such a greater level of accommodation for older people will be required. The State of Suffolk 2019 report³ contains estimates of specialist accommodation will be required across the county.

The types of housing for older people included in policy FRES 2 are all appropriate, however SCC are also keen to encourage extra care housing. Living in specialist accommodation has been shown to benefit the health and wellbeing of older people, however this is particularly the case for Extra Care facilities, which provide communal facilities, onsite care and support. It is therefore recommended that Policy FRES 2 supports the provision of Extra Care accommodation.

Public Rights of Way

It is noted that “rural footpaths” are highlighted as important to the community in paragraph 6.7. It is likely that these footpaths will be part of the Public Rights of Way (PRoW) network. PRoW are public routes which perform a number of functions, including:

- enabling access to the countryside, which has benefits for health and wellbeing;
- providing links between rural communities; and
- acting as wildlife corridors.

NPPF paragraph 98 states that planning policies should “protect and enhance the public rights of way network”.

Presently the Mid Suffolk planning policies do not do this in a general sense, however SCC will be working with the district council to ensure this is rectified in the Babergh Mid Suffolk Joint Local Plan. In the meantime, the Neighbourhood Plan could include policy to achieve this. It is recommended that the following wording is inserted into the plan, either as it’s own policy or as a part of another policy.

“Where Public Rights of Way should be protected and where possible enhanced, with new routes or connections.”

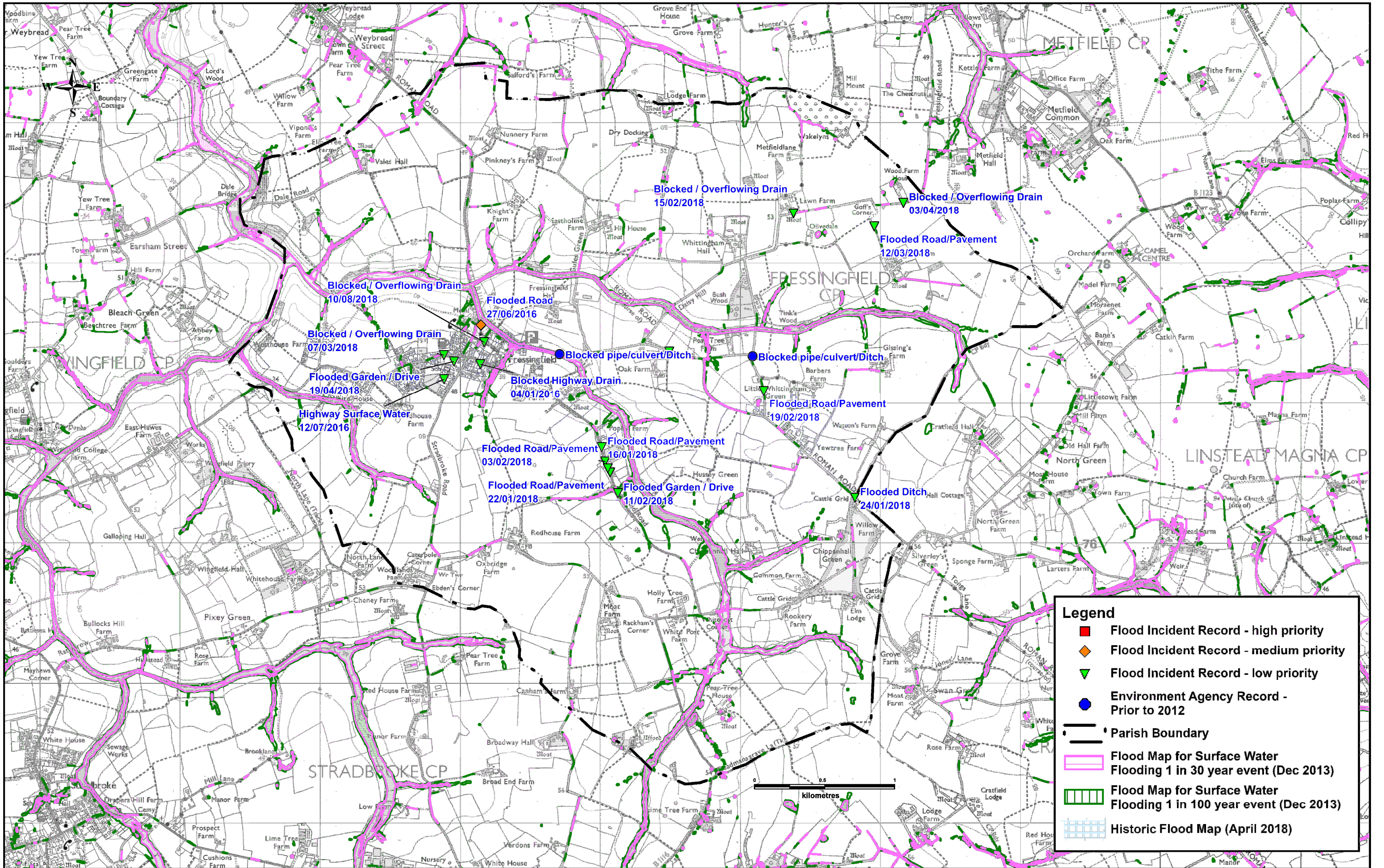
² <https://www.healthysuffolk.org.uk/jsna/reports/health-needs-assessments>

³ <https://www.healthysuffolk.org.uk/jsna/state-of-suffolk-report/sos19-where-we-live>

If there is anything I have raised you would like to discuss, please use my contact information at the top of this letter.

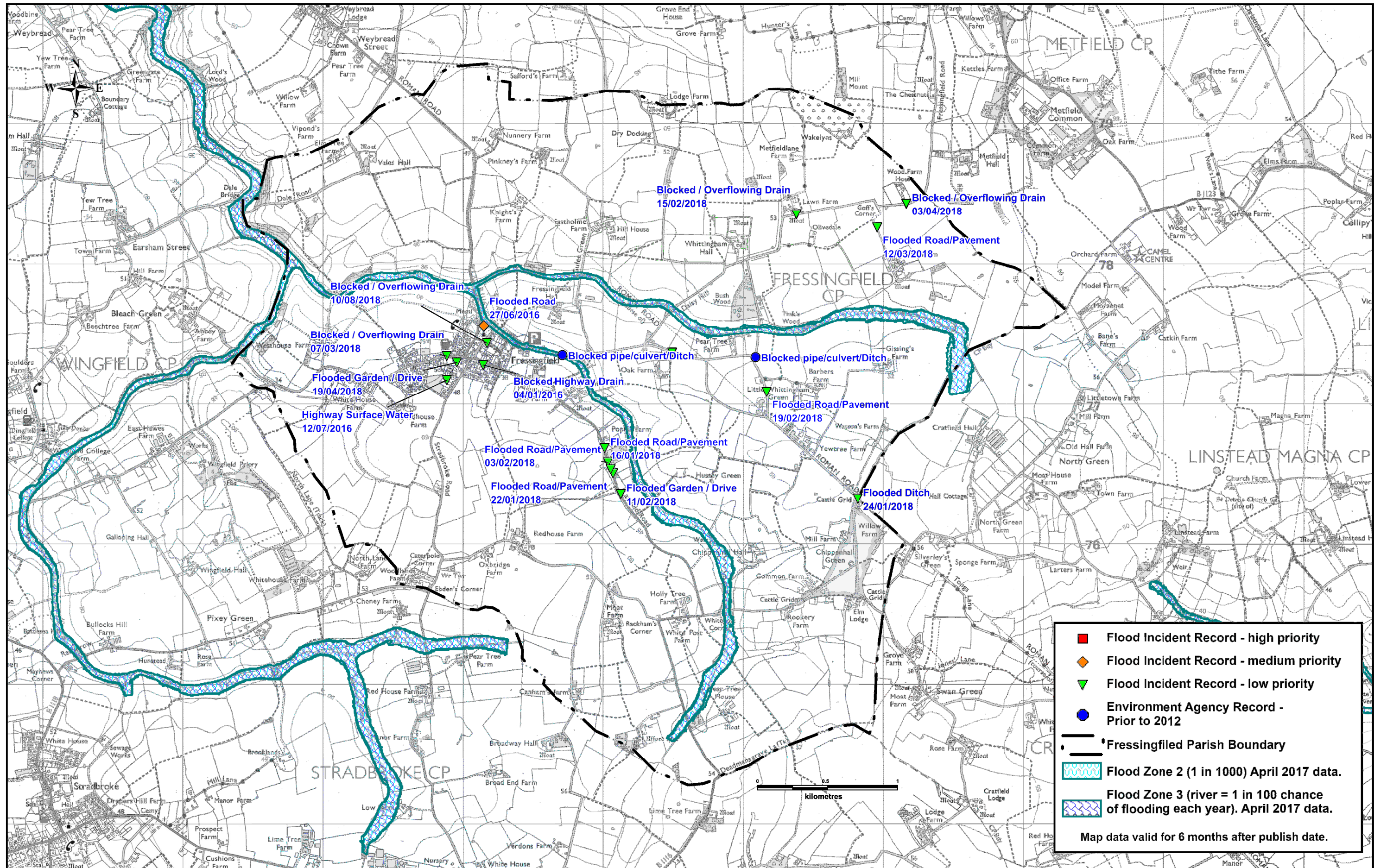
Yours sincerely,

Cameron Clow
Planning Officer
Growth, Highways, and Infrastructure



Legend

- Flood Incident Record - high priority
- ◆ Flood Incident Record - medium priority
- ▼ Flood Incident Record - low priority
- Environment Agency Record - Prior to 2012
- Parish Boundary
- Flood Map for Surface Water Flooding 1 in 30 year event (Dec 2013)
- Flood Map for Surface Water Flooding 1 in 100 year event (Dec 2013)
- Historic Flood Map (April 2018)



- Flood Incident Record - high priority
- ◆ Flood Incident Record - medium priority
- ▼ Flood Incident Record - low priority
- Environment Agency Record - Prior to 2012
- Fressingfield Parish Boundary
- Flood Zone 2 (1 in 1000) April 2017 data.
- Flood Zone 3 (river = 1 in 100 chance of flooding each year). April 2017 data.

Map data valid for 6 months after publish date.

River and Sea Flood Risk for - Fressingfield Parish.

* Please note this map should not be used to assess flood risk for individual properties, it should only be viewed at a local area scale to give an approximate flood extent. For example small flood defences may not have been incorporated into these flood maps which can influence flood risk.

Map data valid for 6 months after publish date.

Appendix 1: Suffolk County Council Regulation 14 Consultation Response

Date: 17/05/2019
Enquiries to: Cameron Clow
Tel: 01473 260171
Email: cameron.clow@suffolk.gov.uk



Dear Fressingfield Parish Council,

Pre-Submission Version of the Fressingfield Neighbourhood Plan

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

SCC is not a plan making authority, except for minerals and waste. However, it is a fundamental part of the planning system being responsible for matters including:

- Archaeology
- Education
- Fire and Rescue
- Flooding
- Health and Wellbeing
- Libraries
- Minerals and Waste
- Natural Environment
- Public Rights of Way
- Transport

This response, as with all those comments which SCC makes on emerging planning policies and allocations, will focus on matters relating to those services.

Suffolk County Council is supportive of the Parish Council's vision for the Parish. In this letter we aim to highlight potential issues and opportunities in the plan and are happy to discuss anything that is raised.

Archaeology

When providing historical background of the parish it would be helpful if the plan could include a background of archaeological records, as this can provide greater understanding to developers about what may be present. Information about archaeological remains in Suffolk can be found at www.heritage.suffolk.gov.uk, which is searchable by parish. SCC would suggest the following text is included in the plan to provide this background information:

"Suffolk County Council maintains the Historic Environment Record (HER), which comprises a database of information on recorded archaeological sites (see www.heritage.suffolk.gov.uk). There are currently 110 entries for Fressingfield, ranging in

date from the Neolithic to the Post-Medieval periods. Many of these are medieval, but, distinctively, a Roman road runs NW-SE through the parish, associated with at least one concentration of Roman finds, and there are finds of varied dates recorded across the south facing valley slope of the tributary of the Waveney, which is topographically favourable for early occupation.”

Objective 7

This objective, which seeks to protect the natural and historic environment of the parish is supported, however this could be taken further. NPPF paragraph 185 states that plans should take into account the desirability to “sustain and enhance the significance of heritage assets”. Following this the objective could be amended to “protect *and enhance* natural and historic assets of Fressingfield”

Historic Environment, paragraph 6.28

In addition to the information regarding non-designated heritage assets which are buildings it would be helpful if there was also some background as to how archaeological assets would be approached. SCC recommends including the following text:

“Development that affects or has potential to affect non-designated archaeological heritage assets (which may be unknown) would be managed through the National Planning Policy Framework and local policy, there should be early consultation of the Historic Environment Record, held by the Suffolk County Council Archaeological Service and assessment of the potential of the area at an appropriate stage in the design of new developments, in order that the requirements of the NPPF and Local Plan policies are met. The Archaeological Service can advise on the level and appropriate stages of assessment”.

The parish council could mention archaeological non designated heritage assets in policy FRES 8, however this is not strictly necessary as this will be covered through the Mid Suffolk Core Strategy and saved policies, and SCC will seek Babergh and Mid Suffolk District Councils to address this through their Joint Local Plan

Appendix C and Appendix 3 of the Character Appraisal

For clarity, this section should be relabelled to “*Non Designated Heritage Assets (buildings)*”

Education

Early years

The sites allocated in the plan would be expected to generate approximately six full time equivalent early years places. Fressingfield ward currently has a surplus of early years places, therefore current early years settings in the area will be able to accommodate the allocations.

Primary

Fressingfield CEVCP has a total capacity of 140 places and a 95% capacity of 133 places. SCC use the 95% figure for planning school places in order to ensure there are places for children coming from minor developments, or joining the school mid-way through the year. The most recent primary school forecasts show the school should have surplus places by 2022/23, and this is still the case when development permitted since the forecast was produced are taken into account. It is currently expected that the school can accommodate the growth proposed in the neighbourhood plan.

There is a planning application outside the parish for 110 dwellings at Weybread, former Crown Chicken Site, The street (DC/17/06326/OUT). If this is granted permission it would take the school over capacity. At present the school takes approximately 33% of its pupils from out of catchment. It is expected that children within the catchment would take priority over out of catchment children in admissions to reception as pupils numbers increase. As such the Neighbourhood plan does not need to address primary school capacity.

Secondary

The catchment secondary school is Stradbroke High School. It is expected there will be available capacity to accommodate the growth in the neighbourhood plan.

Fire and Rescue

Suffolk Fire & Rescue Service has considered the plan and are of the opinion that, given the level of growth proposed, we do not envisage additional service provision will need to be made in order to mitigate the impact. However, this will be reconsidered if service conditions change. As always, SFRS would encourage the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but if incorporated into the design/build stage it is extremely cost effective and efficient. SFRS will not have any objection with regard access, as long as access is in accordance with building regulation guidance. We will of course wish to have included adequate water supplies for firefighting, specific information as to the number and location can be obtained from our water officer via the normal consultation process.

Flooding

SCC is the Lead Local Flood Authority in Suffolk. The plan shows an awareness of the surface water flooding issues, focussing on the issues with the Anglian Water foul water system which can become overwhelmed with surface water during high rainfall events. While this is an important element to consider, the plan should also outline the other conditions in Fressingfield that contribute to flooding.

There are a significant number of mapped and unmapped watercourse that flow through the parish. As noted in the plan, a number of dwellings are predicted and known to flood. The parish has varied soil geology meaning that the permeability of the soil is poor in some places. Most surface water flows to into a watercourse through open channels or the existing public surface water sewer. Accompanying this response are maps showing fluvial (from rivers) and pluvial (from surface water) flood risk and events. It is recommended these are included in the plans evidence base.

Policy FRES 11

Due to the flood risk within the village and the arrangement of the watercourse and foul water system SCC recommends that neighbourhood plan policy not only seeks to prevent exacerbation of flood risk but require betterment of the situation from development. This will help to reduce the flood risk within Fressingfield and elsewhere. The suggested amendment below to policy FRES 11 requires runoff rates to be reduced to lower than greenfield rates, effectively slowing the rate at which water reaches water courses and reducing flood risk. Deleted text is in ~~strike through~~ and added text is in *italics*.

All new development should take advantage of modern ~~sustainable drainage methods~~ *Sustainable Drainage Systems* including rainwater capture and grey water recycling to prevent flooding or drainage issues. ~~New development should not exacerbate existing identified flooding issues or cause new areas to flood or cause pollution.~~ and seek to achieve lower than greenfield runoff rates.

References to specific drainage methods have been removed as these will be depend on the circumstances of a specific site. Additionally, grey water recycling is not a SUDs measure, but a resource sustainability measure and so not appropriately placed in this policy.

Health and Wellbeing

Joint Suffolk Health and Wellbeing Strategy

NPPF paragraph 92 states that planning policies should “take into account and support the delivery of local strategies to improve health, social, and cultural wellbeing for all sections of the community”. SCC, as part of the Suffolk Health and Wellbeing Board has recently refreshed the Joint Suffolk Health and Wellbeing Strategy which encourages a “health in all policies approach”, to incorporate health considerations into decision making across a variety of areas.

Planning is able to affect health and wellbeing and it is welcome that the Neighbourhood Plan mentions health throughout.

SCC would encourage that the plan makes reference to the Joint Suffolk Health and Wellbeing Strategy and recognises the potential links between the this and the plan.

The strategy is currently in the process of being refreshed and updated, however an overview of current priorities can be found here <https://www.healthysuffolk.org.uk/uploads/Joint-Health-and-Wellbeing-Strategy-for-2016-2019.pdf>.

Specialist Accommodation for Older People

SCC supports the policy FRES 2, which states that development should provide housing for older people. The Suffolk Joint Strategic Needs Assessment (JSNA) Healthy Aging Needs Assessment published in July 2018 highlighted that the proportion of the population over 65 will significantly increase over the next 20 years⁴, as such a greater level of accommodation for older people will be required. The State of Suffolk 2019 report⁵ contains estimates of specialist accommodation will be required across the county.

The types of housing for older people included in policy FRES 2 are all appropriate, however SCC are also keen to encourage extra care housing. Living in specialist accommodation has been shown to benefit the health and wellbeing of older people, however this is particularly the case for Extra Care facilities, which provide communal facilities, onsite care and support. It is therefore recommended that Policy FRES 2 supports the provision of Extra Care accommodation.

Minerals and Waste

SCC is the minerals and waste planning authority in Suffolk, which means the county council is responsible for determining planning applications and making planning policy for minerals and waste development. The current relevant policy documents are the Minerals Core Strategy and the Waste Core Strategy. The Suffolk Minerals and Waste Local Plan (SMWLP) is also a material consideration and is expected to supersede both of these documents later in 2019. The SMWLP is currently in submission draft and awaiting examination in public.

Minerals

The main minerals resource in Suffolk is sand and gravel. Policy 5 of the Minerals Core Strategy and Policy MP10 of safeguard potential mineral resources from being made permanently inaccessible by development. This is done through the minerals consultation area, which identifies the location of potential sand and gravel resources.

A significant proportion of Fressingfield parish is within the minerals safeguarding area, however due to the scale of the development and the proximity to other residential areas the sites do not trigger safeguarding policies. It is considered that the plan does not cause any minerals safeguarding issues

Waste

Policies WDM1 in the Waste Core Strategy and WP18 if the SMWLP safeguard existing and proposed waste facilities from being prejudiced by other development. There were no waste facilities identified within the parish, as such there is not expected to be any waste safeguarding issues

⁴ <https://www.healthysuffolk.org.uk/jsna/reports/health-needs-assessments>

⁵ <https://www.healthysuffolk.org.uk/jsna/state-of-suffolk-report/sos19-where-we-live>

Natural Environment

Greenest County.

As a member of the Creating the Greenest County partnership, the county council encourages participation in the initiative wherever possible. The key themes of the partnership are:

- Climate mitigation
- Climate adaptation
- Protecting and enhancing the natural environment.

These themes are incorporated into the policy and objectives of the plan, which is welcome. More information about Creating the Greenest County can be found on the partnership website: <http://www.greensuffolk.org/about>.

Biodiversity

Requirements in Policy FRES 10 to avoid detrimental impact on wildlife are supported, however the policy could go further. Paragraph 170d states that planning policies should minimise loss to biodiversity and provide biodiversity net gains. Net gains could be incorporated into policy FRES 10 by supporting development which:

- Retains existing ecological networks and features
- Design landscaping to encourage wildlife and to connect and enhance wider ecological networks.
- Ensure divisions between gardens allow for the movement of species (such as hedgehogs, between gardens and green spaces.

Below is suggested wording to enhance the policy

“Development proposals that incorporate into their design features which provide gains to biodiversity will be supported. Landscaping and planting should encourage wildlife, connect to and enhance wider ecological networks, and include nectar rich planting for a variety of pollinating insects. Divisions between gardens, such as walls and fences, should still enable movement of species, such as hedgehogs, between gardens and green spaces. Existing ecological networks should be retained”

Public Rights of Way

It is noted that “rural footpaths” are highlighted as important to the community in paragraph 6.7. It is likely that these footpaths will be part of the Public Rights of Way (PRoW) network. PRoW are public routes which perform a number of functions, including:

- enabling access to the countryside, which has benefits for health and wellbeing;
- providing links between rural communities; and
- acting as wildlife corridors.

NPPF paragraph 98 states that planning policies should “protect and enhance the public rights of way network”.

Presently the Mid Suffolk planning policies do not do this in a general sense, however SCC will be working with the district council to ensure this is rectified in the Babergh Mid Suffolk Joint Local Plan. In the meantime, the Neighbourhood Plan could include policy to achieve this. It is recommended that the following wording is inserted into the plan, either as it's own policy or as a part of another policy.

“Where Public Rights of Way should be protected and where possible enhanced, with new routes or connections.”

Transport

Policy FRES 10

Parts i and j of the policy refer to “sufficient” parking without defining what sufficient means. Mid Suffolk District Council have adopted the Suffolk Guidance for Parking (updated 2015)⁶ by the county council. The guidance covers parking for cars, electric vehicles, and bicycles, and it also covers a variety of development types, not just residential.

To ensure the plan has clearly defined and effective parking standards it is recommended part j of the policy is amended, but also moved to the section of the policy stating “New development should...”. The placement of parts i and j in the policy means they only apply to residential development, while parking standards should apply to all appropriate development. Below is some suggested replacement text.

“provide parking in line with the recommendations in Suffolk Guidance for Parking (updated 2015) or successor documents.”

It is recommended that reference to parking is removed from part I of the policy to avoid repetition.

Policy FRES 15

SCC supports policy requirements to improve pedestrian and cycling facilities.

Community Action Project: Speed Limits

The desire to limit vehicle speeds in the village is noted. SCC have speed limit policy criteria. A summary of the criteria is presented below.

Unless in exceptional circumstances, locations will not be considered for 20mph schemes where any of the following apply:

1. they are on A or B class roads;
2. they have existing mean speeds above 30 mph;
3. there is no significant community support as assessed by the local County Councillor.

Locations will then only be considered for 20 mph limits or zones if two out of three of the following criteria are met:

1. current mean speeds are at or below 24 mph;
2. there is a depth of residential development and evidence of pedestrian and cyclist movements within the area;
3. there is a record of injury accidents (based on police accident data) within the area within the last five years.

The following link contains information on speed limit policies and how the parish council might initiate the process of assessing the need for a speed limit.

<https://www.suffolk.gov.uk/roads-and-transport/traffic-management-and-road-safety/speed-limits/>

Community Action: Traffic Calming

⁶ <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/>

SCC is supportive of the principle of traffic calming in Fressingfield, however there is currently no specific project or funding identified. If a funding source can be identified SCC would be willing to work with the Parish Council to identify and establish appropriate measures.

Community Action Project: Lack of Footpaths

As noted in the plan, the lack of pedestrian facilities within the village is an issue the county council is aware of. The main challenge in addressing this issue is the lack of land available to put footways in place. In principle SCC supports policies improvements to the safety and accessibility of pedestrians in the plan that seek to enable this.

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. Some of these issues may be addressed by the SCC's Neighbourhood Planning Guidance, which contains information relating to County Council service areas and links to other potentially helpful resources.

The guidance can be accessed here: [Suffolk County Council Neighbourhood Planning Guidance](#).

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

(2) Natural England

Date: 9 August 2019
Our ref: 290917



Babergh Council

BY EMAIL ONLY

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

T 0300 060 3900

Dear Sir

Fressingfield Neighbourhood Plan – Reg 16 consultation

Thank you for your consultation on the above dated 2 August 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 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 faithfully
Dawn Kinrade
Consultations Team

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

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)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](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/)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://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

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 171. 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.

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>

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).

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/>

(3) Historic England



Historic England

By e-mail to:
Community Planning Team
Babergh and Mid Suffolk Council

Our ref: PL00570229
Your ref:
Date: 18/09/2019
Direct Dial: xxxx
Mobile: xxxx

Dear Community Planning Team,

Ref: Fressingfield Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of the Fressingfield 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



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Mid Suffolk District Council
Spatial Planning Policy Team
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2019/124398/01-L01

Date: 27 September 2019

Dear Sir/Madam

FRESSINGFIELD NHP REG 16 CONSULTATION

Thank you for your letter relating to the Fressingfield Neighbourhood Plan. We have assessed the draft Neighbourhood Plan as submitted and our letter contains our response and information in relation to environmental issues that should be considered during the development of the Neighbourhood Plan.

Our principal 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 two documents useful. They explain our role in in the planning process in more detail and describe how we work with others; they provide:

- An overview of our role in development and when you should contact us.
- Initial advice on how to manage the environmental 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://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf

Flood Risk

Fressingfield lays partly in flood zone 3, the high probability flood risk zone. Flood risk has been considered within the Neighbourhood plan in section 6. We support section 6.49 with regards to sequentially siting proposed development into less vulnerable areas. This could be enhanced to state that all proposed development applications in flood zones 2 or 3 should be accompanied with a Flood Risk Assessment and should not increase flood risk elsewhere.

In regards to section 6.47 we can confirm that our flood data for our flood maps comes from flood models rather than reports from residents of flooding. We do appreciate and accept information relating to local flooding in area and we use this information towards our history of flooding reports. Reporting localised fluvial flooding should be reported us ourselves and reports of surface water flooding should be reported to the Lead Local Flood Authority, which in this case is Suffolk County Council.

You should be using our up to date flood maps which can be found [here](#). These can also be found within the Strategic Flood Risk Assessment (SFRA), however the SFRA for Midsuffolk council is currently out of date. There are clear separate maps for fluvial flooding and surface water flooding and these remain two separate constraints when reviewing proposed developments for planning. This should be reflected in the Neighbourhood plan.

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 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.

Yours faithfully

Miss Natalie Kermath
Planning Advisor

Direct dial XXXXX

Direct e-mail natalie.kermath@environment-agency.gov.uk

Fressingfield NP Consultation
c/o Mr Paul Bryant
Spatial Planning Policy Team
Babergh & Mid Suffolk DC
Endevaour House
8 Russell Road
Ipswich
IP1 2BX

Lucy Bartley
Consultant Town Planner

Tel: [REDACTED]
n.grid@woodplc.com

Sent by email to:
communityplanning@baberghmid.suffolk.gov.uk

10 September 2019

Dear Sir / Madam

Fressingfield 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 (NGGDL). Since May 2018, NGGDL 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.

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has **no record** of such apparatus within the Neighbourhood Plan area.



Electricity Distribution

The electricity distribution operator in Mid Suffolk and Babergh District Council is Energetics Electricity. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

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 below 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

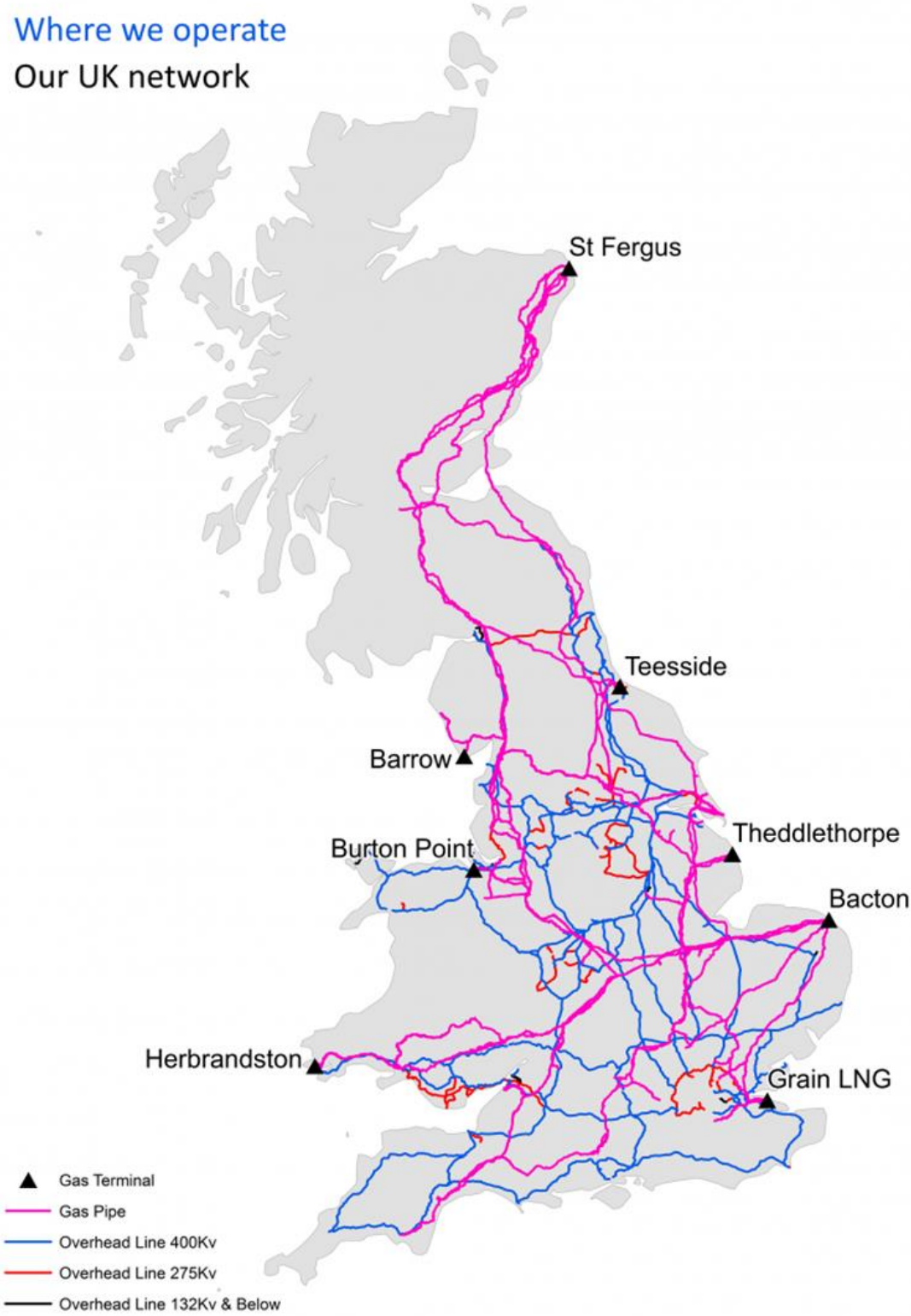
[via email]

Lucy Bartley
Consultant Town Planner

cc. Spencer Jefferies, National Grid

APPENDIX 1: NATIONAL GRID'S UK NETWORK

Where we operate
Our UK network



(6) Suffolk Preservation Society



Respecting the past, shaping the future

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

16 September 2019

communityplanning@baberghmidsuffolk.gov.uk

Dear Sir

Re: Fressingfield Neighbourhood Plan - Reg 16 Submission Consultation

I am writing on behalf of the Suffolk Preservation Society (SPS), the only countywide amenity society dedicated to protecting and promoting the special historic and landscape qualities of Suffolk. We also represent the Campaign for the Protection of Rural England in Suffolk and work closely with parish and town councils and other bodies who share our objectives. As Neighbourhood Plans offer the opportunity for protecting or improving the heritage and landscape character of an area, SPS are supportive of plans being drawn up in Suffolk, particularly where they are centred on historic settlements such as Fressingfield distinctive by rich architectural heritage and landscape quality. Having read the draft plan we would like to make the following observations.

In recent years the SPS has worked to support residents of Fressingfield in responding to the raft of speculative planning applications and we are delighted that the parish has responded positively by the production of this draft Neighbourhood Plan. We congratulate the Neighbourhood Plan team on the outstanding draft document and the thorough assessment work that has been undertaken in particular on landscape, design and heritage. The SPS strongly endorse the efforts to safeguard the special heritage and landscape qualities of Fressingfield. We are particularly impressed that you have identified and drafted a policy for the protection of Non Designated Heritage Assets. You are one of small minority of plans to date that has recognised the importance of this area of heritage management from the outset and we applaud you for your insight. We also consider that the identification of Local Green Spaces and the production of the Character Appraisal will help to guide and promote appropriately located and high quality design going forward. The Society fully supports the Fressingfield Neighbourhood Plan.

Yours sincerely,

Fiona Cairns MRTPI IHBC
Director

(7) SAFE – Supporters Against Fressingfield Expansion

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 John Castro
Job Title (if applicable):	Chairman
Organisation / Company (if applicable):	SAFE (Supporters Against Fressingfield Expansion)
Address	██
Postcode:	████████
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.	

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

Support yes Support with mods Oppose Have Comments

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

Please be as brief and concise as possible ..

SAFE is a group of Fressingfield residents involved in Planning Issues. Our full range of activities can be seen on our web site fressingfieldhousing.org
Our mandate originated from a scientifically sound petition within the village where our aims to prevent overdevelopment were supported by 94% of villagers.
SAFE supports the adoption of the Neighbourhood Plan and recognises that a great deal of work has gone into its production.
Individual members of SAFE will be making comment on the detail within the Plan, but the overall principles are supported by our Group.

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 ..

I do not consider a hearing to be 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 Fressingfield NP by Mid Suffolk DC	yes

Signed: John Castro- on behalf of SAFE	Dated: 15/08/19
---	------------------------

(8) Castro (Resident) 1 of 2

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

Part A: Respondent	
Title / Name:	Dr. and Mrs John Castro
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
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.
---------------	------------

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

Support X Support with modifications Oppose Have Comments X

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

Please be as brief and concise as possible ..

General Comment The NDP Working Group should be congratulated for all of the time and effort they have devoted to the production of this Plan. The result is a comprehensive and well thought through document.

The two public open forums were extremely well advertised and a wealth of material was on display and Group Members were on hand to answer questions. It is disappointing that so few villagers subsequently submitted written responses, but the lack of submissions in no way reflects the efforts by the Group to engage local people in the process.

We believe the key issues to be.

- * Failure to explain how a target figure of 60 houses was arrived at?
- * The introduction of a Section on Community Housing Trusts, not in the original submission, nor forming part of the public meetings.
- * The use of the wrong figures for Listed buildings/ assets in the Parish, thereby down playing their significance

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

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.	2.15	Policy No.	
---------------	------	------------	--

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

Support Support with modifications Oppose Have Comments x

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

Please be as brief and concise as possible ..

The statement on Listed Buildings is incorrect. Attached at appendix A is a schedule of the listed buildings/assets in Fressingfield - 58.(including two grade 1 and two grade 2*) Fressingfield has a very HIGH number of Listed Buildings, not low as stated in the document. The ratio of listed buildings to the total number of buildings in the Parish must be one, if not the highest in Mid Suffolk.

This should be corrected and brought to the attention of the Inspector. The emerging Local Plan and the NPPF place emphasis on protecting historic assets and " their setting". As there are so many Listed assets this should be a significant issue.

We did highlight this error in our response to the first round of consultation, but were merely referred to the source document.

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Correct the error

(Continue on separate sheet if necessary)

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.	3.5 and 5.2	Policy No.	
---------------	-------------	------------	--

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

Support Support with modifications Oppose Have Comments x

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

It is very clear that the document is not about preventing development, but is about setting the parameters within which development can take place. A key issue is the agreed level of new housing . Unfortunately from the document it is not possible to understand how a target of 60 new homes over the Plan Period is calculated. This is not helped by the figure in 3.5 being incorrect. For Mid Suffolk the correct figures are 1174 homes spread across 44 Hinterland villages during the Plan Period. (this would result in an average of 27 per village, but it is recognised that not all Hinterland Villages are equal) Subsequent correspondence with Andrea Long and discussion with Elizabeth Thomas (MSDC) have enabled us to understand how this arrived at. In the Draft Local Plan a minimum of 56 homes is recommended (51 already have Planning Approval). This figure can only move upward through the recommendations within NDP. The NDP has produced a target of 60, but there is no supporting evidence based on assessed housing need.

Whilst this is a target Andrea Long wrote to us on 7th August

" It is possible that if the traffic and flood issues in the village are not resolved during the Plan Period and that the District Council continues to refuse applications as a consequence, that this windfall allowance of 9 may not be achieved." This position is confirmed in the draft NDP.

The figure of 60 new homes is supported by the Parish Council and Local Authority and whilst there is no evidence to support the additional 4 homes over and above the Local Plan the target seems reasonable subject to the issues raised in Andrea Long's email.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Correct the figures

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.	4.1	Policy No.	
---------------	-----	------------	--

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

Support Support with modifications Oppose Have Comments x

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

Whilst this is a visionary statement aspirations should be deliverable. We do not think these are. There is no point in aiming for something that is not possible to achieve. How can a robust and sustainable infrastructure be achieved when sewage egress and flooding cannot be corrected by Anglian Water and New Street physically cannot have pavements.

(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.

For Office use only:

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.	4.8	Policy No.	
---------------	-----	------------	--

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

Support Support with modifications Oppose x Have Comments

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

Why is the Village Improvement Plan here? This section has been greatly expanded since the first draft. It is stated that the Improvement Plan is not a remit of the NDP. If this is the case it should therefore be in an appendix, if at all.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

This section to an Appendix

(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.

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.	5.15	Policy No.	
---------------	------	------------	--

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

Support Support with modifications Oppose Have Comments x

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

Not clear whether the comments made here were the majority of those attending the open sessions or a minority view.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Need more clarity on the status of comments made.

(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.

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.	5.27	Policy No.	Fres 2
---------------	------	------------	--------

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

Support Support with modifications Oppose Have Comments x

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

The NDP policy on 4 bedroom houses is unclear. Fres 2 does not identify any need whereas para 5.27 does.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Clarification on the policy

(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.

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.	5.28	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:

This section on Community Housing is completely new and its status is totally unclear. It was not within the original consultation document nor displayed at the public events. Whilst we accept that new issues will be incorporated in response to consultation this is rather a major one and is it, or is it not part of the NDP ? To include this within the document at this stage when it has not been widely consulted upon does not give it legitimacy. This lacks transparency and a failure in due process. We believe that as Community Housing Trusts have to operate within the legal Planning framework are therefore surprised that this was not included in the original NDP submission.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

This should not have been included as it feels very much that this has been "slipped under the wire" contrary to the principles of open governance.

(Continue on separate sheet if necessary)

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

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.	7.4	Policy No.	
---------------	-----	------------	--

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

Support Support with modifications Oppose Have Comments x

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

This para has been amended since the original to include the 55 people who work at CE Davidson. What it does not make clear is that the employees who live in the village have to travel from the centre of the village to the company HQ or the site where they are working. This adds to the traffic issues.
There are only 64 Whole Time Equivalent jobs physically in the centre of the village. Many of these require a higher degree- teacher, doctor, nurse etc.

(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 ...

We do not consider that a hearing should be held. Whilst we have been critical in a number of areas we feel that a very reasonable document has been produced and will vote in favour of its adoption when this comes to a referendum.

(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 Fressingfield NP by Mid Suffolk DC	yes

Signed:	Dated: 17 August 2019
----------------	------------------------------

British Listed Buildings (/)

History in Structure

[HOME \(/\)](#) / [ENGLAND \(/ENGLAND\)](#) / [SUFFOLK \(/ENGLAND/SUFFOLK\)](#) / [FRESSINGFIELD](#)



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There is still time to book your 2019
beach holiday!
(<https://britishbeaches.uk/beach-cottages?ak=bc0>)

Listed Buildings in Fressingfield, Mid Suffolk, Suffolk



1. II [Baptist Chapel \(/101032934-baptist-chapel-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
2. II [Barbers Farmhouse \(/101032931-barbers-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
3. II [Barn 25 Metres North of Metfieldlane Farmhouse \(/101182027-barn-25-metres-north-of-metfieldlane-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
4. II [Barn 30 Metres North East of Ufford Hall \(/101352179-barn-30-metres-north-east-of-ufford-hall-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
5. II [Barn 40 Metres West of Hill House \(/101032959-barn-40-metres-west-of-hill-house-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
6. II [Barn 60 Metres East of Whittingham Hall \(/101284832-barn-60-metres-east-of-whittingham-hall-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
7. II* [Barn Approximately 50 Metres West South West of Church Farm Stable \(/101245363-barn-approximately-50-metres-west-south-west-of-church-farm-stable-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
8. II [Bridge Cottage \(/101181998-bridge-cottage-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
9. II [Chippenhall Hall \(/101032928-chippenhall-hall-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
10. II [Church House \(/101032966-church-house-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
11. I [Church of St Peter and St Paul \(/101181830-church-of-st-peter-and-st-paul-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
12. II [Elm Tree Farmhouse \(/101181870-elm-tree-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
13. II [Farriers \(/101032965-farriers-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
14. II* [Fressingfield Hall \(/101352192-fressingfield-hall-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
15. II [Fressingfield Lodge \(/101032957-fressingfield-lodge-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
16. II [Fressingfield War Memorial Cross \(/101453718-fressingfield-war-memorial-cross-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21

17. II [Glissings Farmhouse \(/101284783-glissings-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
18. II [Hemm-Dinn and Adjoining Cottage Occupied by Mr Gibson \(/101181855-hemm-dinn-and-adjoining-cottage-occupied-by-mr-gibson-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
19. II [Hill House \(/101032958-hill-house-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
20. II [Ivydene \(/101032932-ivydene-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
21. II [K6 Telephone Kiosk Near the Guildhall \(/101240803-k6-telephone-kiosk-near-the-guildhall-fressingfield\)](#) 
Fressingfield, Mid Suffolk, Suffolk, IP21
22. II [Knights Farmhouse \(/101032938-knights-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
23. II [Knoll House \(/101352193-knoll-house-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
24. II [Ladymeade \(/101284707-ladymeade-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
25. II [Manor Farmhouse \(/101032960-manor-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
26. II [Metfieldlane Farmhouse \(/101352182-metfieldlane-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
27. II [Mill Green House \(/101352194-mill-green-house-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
28. II [Moat Farmhouse \(/101032961-moat-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
29. II [Mount Pleasant \(/101032936-mount-pleasant-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
30. II [Oldcott \(/101352176-oldcott-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
31. II [Oxbridge Farmhouse \(/101032962-oxbridge-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
32. II [Pear Tree House \(/101032929-pear-tree-house-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
33. II [Pinkney's Farmhouse \(/101032963-pinkneys-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
34. II [Priory House \(/101182048-priory-house-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
35. II [Prospect House \(/101032937-prospect-house-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
36. II [Providence House \(/101181849-providence-house-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
37. II [Richmond House \(/101181802-richmond-house-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
38. II [Rookery Farmhouse \(/101284835-rookery-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
39. I [Stable 80 Metres North of Church Farmhouse \(/101181804-stable-80-metres-north-of-church-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
40. II [Street Farmhouse \(/101284734-street-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
41. II* [The Fox and Goose \(/101032967-the-fox-and-goose-fressingfield\)](#) 
Fressingfield, Mid Suffolk, Suffolk, IP21
42. II [The Lodge \(/101032933-the-lodge-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
43. II [The Old Jolly Farmers \(/101284838-the-old-jolly-farmers-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
44. II [The Vicarage \(/101352181-the-vicarage-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21
45. II* [Tithe Farmhouse \(/101032927-tithe-farmhouse-fressingfield\)](#)
Fressingfield, Mid Suffolk, Suffolk, IP21

46. II Tomb of Archbishop Sancroft (/101352155-tomb-of-archbishop-sancroft-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21

47. II Two Cottages 300 Metres South East of Tithe Farmhouse (/101352177-two-cottages-300-metres-south-east-of-tithe-farmhouse-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21

48. II* Ufford Hall (/101032930-ufford-hall-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21

49. II Vales Hall (/101352156-vales-hall-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21

50. II Vine Cottage (/101032969-vine-cottage-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21

51. II Wakelyns Farmhouse (/101032935-wakelyns-farmhouse-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21

52. II Watsons Farmhouse (/101284754-watsons-farmhouse-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21

53. II Whitehouse Farmhouse (/101182044-whitehouse-farmhouse-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21

54. II Whitepost Farmhouse (/101352178-whitepost-farmhouse-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21

55. II Whittingham Hall (/101032964-whittingham-hall-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21

56. II Willow Farmhouse (/101032968-willow-farmhouse-fressingfield)

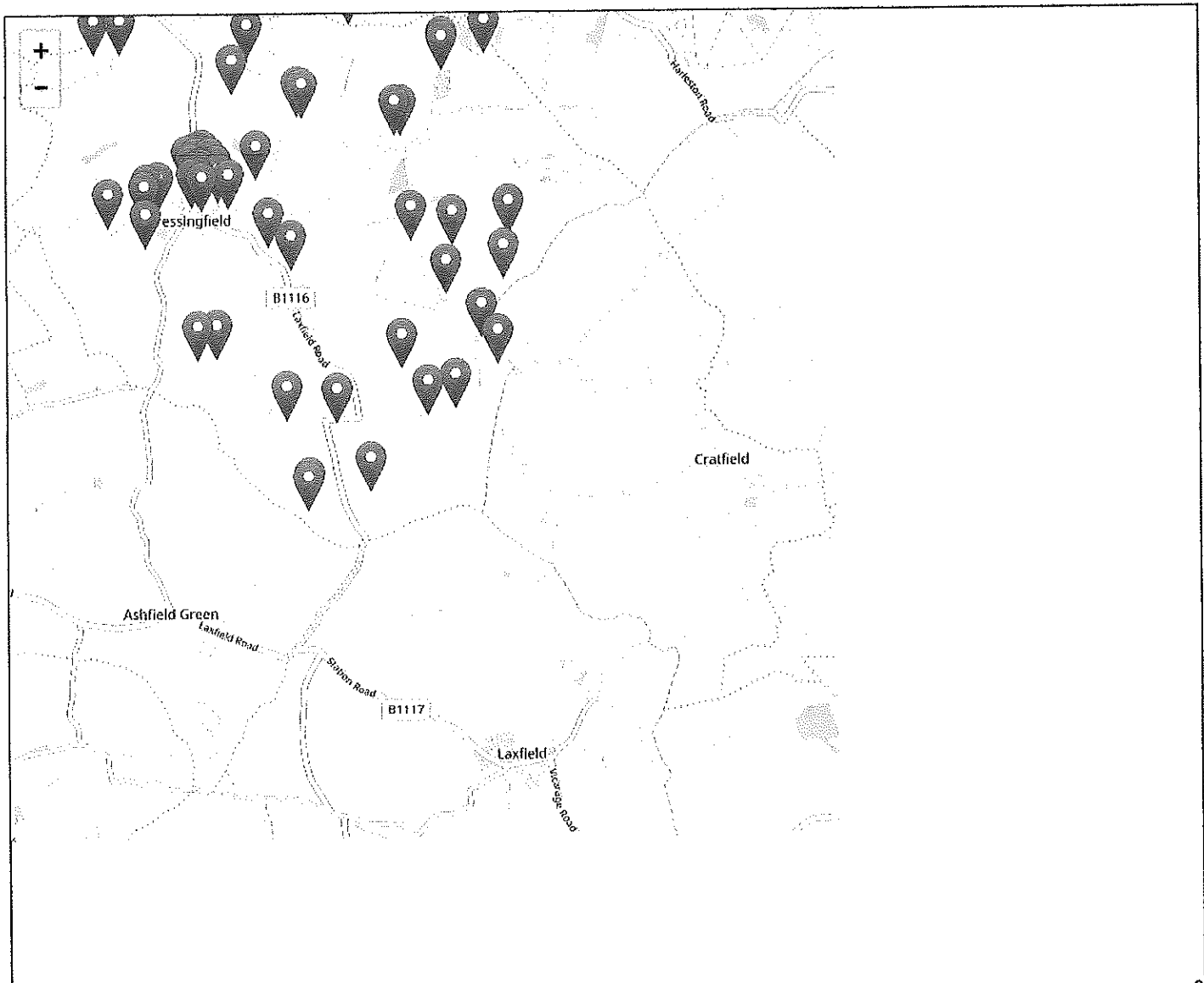
Fressingfield, Mid Suffolk, Suffolk, IP21

57. II Willow House (/101181991-willow-house-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21

58. II Yewtree Farmhouse (/101352180-yewtree-farmhouse-fressingfield)

Fressingfield, Mid Suffolk, Suffolk, IP21



(8) Castro (Resident) 2 of 2

RECEIVED BY E-MAIL

From: Dr / Mrs Castro
To: Paul Bryant (BMSDC)
cc: Cllr Lavinia Hadingham
Sent: Thur 26 Sept 2019 (15:25)
Attach: Rural Exception Sites.docx

Dear Mr. Bryant,

We know that consultation on the Fressingfield draft NDP closes tomorrow and we have already submitted our personal comments. We therefore apologise for this "supplemental " submission.

We believe that the very important issue of Rural Exception Sites should be addressed both within the emerging Local Plan and Neighbourhood Plans. It is unfortunate that this has come to the fore rather late in the Fressingfield Plan process, but we hope that some mechanism can be found to incorporate proposals for establishing local guidelines. Unusually LPAs seem to have been given a great deal of local discretion in this matter!

Boundaries need to be agreed and set within which an RES can operate. We have looked at what has been put in place elsewhere and not to set any parameters would, we believe, be foolish, especially as dwellings built on designated RES are **outside** the target totals agreed within a NDP and a RES enjoys much greater "Planning Freedom" than conventional sites.

We attach our proposals for amendments to the NDP. [\[See below\]](#)

Yours sincerely,

Dr. & Mrs. J.E. Castro

* * * * *

Fressingfield NDP - Rural Exception Sites. (RES)

Transparency is important when considering the implications of rural exception sites for housing requirement figures. RES are primarily to provide affordable housing, and market housing to be included only if viability is an issue. All dwellings introduced through a RES into an area would be *in addition* to the housing numbers determined by the Council and the neighbourhood plan.

Such sites are a vital means of securing sustainability for rural villages as they guarantee affordable housing for local residents in perpetuity thus anchoring the economic and social benefits that long term residents bring. Conversely, such development should not overload infrastructure, while the market housing option included to make such affordable housing viable, should not distort housing need and open a loophole for unsuitable development.

Drawing on the approaches from elsewhere and the NPPF itself, we suggest the following amendments to the NDP to ensure its objectives are met sustainably:

- RES must be (mirroring the NPPF requirements including for Entry Level Exception sites)
 - *‘adjacent to existing settlements and proportionate in size to them’, ‘not exceed 5% of the area of the existing settlement’.*
 - *‘not compromise the protection given to areas or assets of particular importance’ including ‘irreplaceable habitats; designated and undesignated heritage assets and areas at risk of flooding or coastal change.’*
- allocation of housing to employees of developers on RES should not lead to indirect subsidy of low wages
- the reuse of agricultural buildings and brownfield sites should be prioritised for RES
- RES must meet proven need and have strong community support (Cornwall’s Local Plan), both evidenced to explicit, robust standards
- standards for infrastructure required should be based on up to date robust evidence
- space, design and amenity standards should be specified
- monitoring arrangements should be in place to ensure the ongoing prioritisation for existing residents
- The important settlement patterns of ancient settlements (which include gaps in settlement) as well as important views and landscapes should not be lost due to RES
- RES must be properly integrated with the village, *‘in terms of the relationship with the built form of the settlement and landscape setting and the quality of pedestrian accessibility to the facilities in the village (mirroring South Norfolk’s Local Plan)*

Dr & Mrs J.E. Castro

26 September 2019

(9) Maydon (Resident)

RECEIVED BY E-MAIL

From: Abi Maydon
To: Paul Bryant (BMSDC)
Sent: Mon 16 Sept 2019 (12:55)

Dear Paul,

May I make a comment for the examiner please in relation to Fressingfield's NPD?

I think the document as a whole is very good and it has taken considerable work to produce.

However paragraph 2.15 is incorrect. Fressingfield does not have few listed buildings, of 23 in number it has 58 listed buildings!

With best wishes,

Abi Maydon

[Ends]

(10) Wolfe (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:	David Wolfe
Job Title (if applicable):	
Organisation / Company (if applicable):	Wakelyns Agroforestry
Address:	Wakelyns, Metfield Lane, Fressingfield
Postcode:	IP21 5SD
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.	7.3	Policy No.	FRES13
---------------	-----	------------	--------

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 am supporting paragraph 7.3 and policy FRES13 (the form won't let me tick the boxes above).

My brother ██████████ and I are the sons and executors of Martin Wolfe who (██████████
████████████████████) owned and lived at Wakelyns, Metfield Lane, Fressingfield.

Over 25 years, they lived at Wakelyns and ran it as an experimental organic rotation agroforestry farm attracting many visitors and national and international attention and acclaim among the scientific, agricultural and wider social communities. The produce was sold locally and they employed many local people over the years.

We do not yet know how we are going to take that forward, but it is likely to involve continuation of their organic agroforestry farming system (possibly including elements of scientific research), potentially alongside a diversification and development of other sympathetic and sustainable farming and other business and social activities on the land and in the buildings.

With that in mind, we are strongly supportive of the general thrust of what is set out in paragraph 7.3 and the relevant part (the last two paragraphs) of policy FRES13.

However, as regards 7.3, we consider that the following sentence puts the position too narrowly:

“Other influences that may have future impacts include factors such as genetic modification, technological advances, a shift to vegetarianism, disease and climate change.”

In particular, in our case (and others in due course we believe), the impetus for change is the wider national and international shift towards more sustainable farming and food systems including with close links to local communities.

We would ask that the sentence above be tweaked to include that.

We also do not understand the reference in the sentence to “disease”.

As for FRES13, we would ask that the penultimate sentence also refer to the use and re-use of agricultural land, and not just buildings; and that the list of things which must be protected (i.e. the proviso in that paragraph, and “the criteria” mentioned in the following paragraph) is expanded to include landscapes, wildlife, hedges and trees.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

As above.

(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	YES
The final ‘making’ (adoption) of the Fressingfield NP by Mid Suffolk DC	YES

Signed: D Wolfe

Dated: 25 September 2019

(11) C. E. Davidson Limited

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

Part A: Respondent	
Title / Name:	Nathan Davidson
Job Title (if applicable):	Director
Organisation / Company (if applicable):	C. E. Davidson Limited
Address:	South View New Street Fressingfield Eye Suffolk
Postcode:	IP21 5PJ
Tel No:	01379 388077
E-mail:	nathan@cedavidson.co.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.	ALL	Policy No.	
---------------	-----	------------	--

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 provided a substantial response to the previous consultation exercise in May 2019. Almost all of these comments are still applicable as no significant changes have been made to the plan (not even factual inaccuracies we pointed out).

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

See comments on previous consultation

(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 Fressingfield NP by Mid Suffolk DC	

Signed:	Dated: 27th September 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.	7.4	Policy No.	
---------------	-----	------------	--

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:

C. E. Davidson Ltd does own houses in Fressingfield but none of these are used to house employees. It is unclear on where this assertion has come from...

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Correction of above this paragraph. As always, we are happy to discuss our involvement in the village with anyone from the NDP Steering Group as many of them appear unaware of the businesses within Fressingfield.

(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 ...

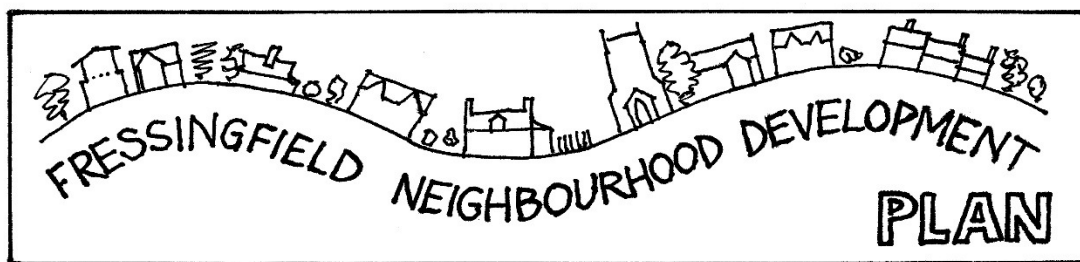
Please be as brief and concise as possible ..

(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 Fressingfield NP by Mid Suffolk DC	

Signed:	Dated: 27th September 2019
----------------	--



Pre-Submission (REG14) Consultation Response Form
Fressingfield Neighbourhood Development Plan (FNDP)

29th March 2019 – 17th May 2019

Please use this form to submit comments about the pre-submission draft Plan. We would prefer receiving responses using the form, which is available to download from the web site. If this is not possible then please complete this paper copy. Further copies are available on request.

Please submit your completed form in one of the following ways:

- 1) Email as an attachment to fressingfieldnplan@gmail.com
- 2) Hand deliver as a paper copy to any of the following drop off locations:

- The Village Stores,
- The Swan Inn ,
- Church of St Peter and Paul Church
- Sancroft Hall
- Sports and Social Club
- The Fox and Goose,
- The Medical Centre (view the plan only; no drop off)

The documents being consulted on may be viewed at these locations, or at the following:

<https://fressingfieldpc.org/neighbourhood-plan/>

This public consultation starts on **29th March 2019** and will run for **7 weeks ending at midnight on 17th May 2019**. Responses received after the closing date/time may not be considered.

Please expand the boxes as necessary or attach additional sheets. Clearly mark any additional sheets with your Name, details and the part of the document the representation relates to.

You don't have to answer every comment box but the more you tell us the more we can ensure the Plan represents local views. please let us know about the things that are important to you

NAME	Nathan Davidson
ADDRESS	South View New Street Fressingfield Eye Suffolk IP21 5PJ

ORGANISATION / CLIENT YOU'RE REPRESENTING (Where applicable)	C. E. Davidson Limited	
EMAIL (optional)	nathan@cedavidson.co.uk	
CONSULTATION RESPONSE <i>Please continue on a separate sheet if the box isn't big enough</i>		
I am generally in favour of the Plan	DISAGREE	
I would like to see changes to the Plan	AGREE	
General comments on the Plan		
<p>The document claims that it is “not a mechanism for stopping development” (1.3) but this is clearly what the plan is aiming to do. Limiting development over the next 17 years to an arbitrary 60 houses will make meeting the other objectives in this document next to impossible.</p> <p>The village school is already at risk of losing a teacher due to a lack of pupils and restricting housing is going to do nothing to encourage families into the village and ensure the survival of our primary school.</p> <p>The plan identifies that Fressingfield has an older population than the Mid Suffolk average and a higher average house price but does not seem to consider either of these issues a problem worth addressing. Instead a suite of policies have been proposed which will only exacerbate these fundamental challenges to the future of the village.</p>		
Do you have any comments on Chapters 1 – 3?		YES
<p>These sections appear to have been written by people with an, at best, academic knowledge of the village of Fressingfield. There are a number of factual inaccuracies and the whole tone seems designed to make Fressingfield sound like a remote hamlet with no need for any further housing.</p> <p>The plan assumes throughout that Fressingfield will be reclassified as a hinterland village but it is unclear on what basis this assumption can be made.</p> <p>Reviewing the Babergh and Mid Suffolk Settlement Hierarchy Review from August 2017, Fressingfield scored 22points (with 18+ being required to classify as a Core Village). Whilst I accept 3 erroneous points given for the butcher, baker and presumably candlestick maker, and 2 for the school bus, Fressingfield is clearly within 5km of various employment centres. Ignoring the substantial employment within the village itself (Doctor's Surgery, Primary School, Tiddlywinks, C. E. Davidson Limited etc.) there are a number of significant employers within 5km of the village - Crown Chicken at Weybread, BQP at Stradbroke, Skinners at Stradbroke, Rattlerow Pigs... Presumably, if information has been accurately provided to MSDC, this will result in a number of additional points being awarded resulting in no overall change in status.</p> <p>Specific comments:</p> <p>1.7 - The Housing Working Group mentioned was specifically formed to oppose development in the village. In fact, “self-nominated” members of the community who were seen as pro development</p>		

All information collected and processed by the Parish Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended). Please note: All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information provided will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit the Parish Council Website or speak to the Clerk.

were removed from the group on the basis of conflict of interest. It is no surprise to find that a document which states its origins in this working group is so anti-development.

2.2 – The B1116 is a Roman Road but not when it passes through Fressingfield. The Roman Road passed to the north east of the village and joins the Weybread Straight to Heveningham Long Lane (via Silverley’s Green)

2.13 – What about nursery facilities for c. 80 children at Tiddlywinks?!

2.14 – Why is the modern development particularly evident on the western approach into the village? There are houses from the 20th & 21st century visible on all approaches to the village... Coming from the west two of the first houses you reach are a 17th century thatched cottage and Mount Pleasant (the oldest house in Fressingfield)...

2.22 – It is surprising that 2.5% of the population have mains gas given there is no gas main connected to Fressingfield...

2.25 – This whole paragraph appears to have been written to make Fressingfield appear more remote than it actually is. The A140 is only 10 miles away and to get to the A12 at Yoxford (which is referenced) you drive along the A1120, only 7.3 miles away at Dennington (and not mentioned). Both of these are major routes through the region and Fressingfield is within striking distance of both.

Do you agree with the Vision and Objectives of the Plan (Chapter 4)?

YES

Whilst I can broadly agree with the vision & objectives of the plan there is little within the plan to suggest that these will ever be achieved.

Do you have any general comments on the Housing and Community Policies (Chapter 5)?

YES

This section appears to back solve to a desired outcome. In spite of the evidence to the contrary it is concluded that no further development is required in Fressingfield. A few specific points:

5.1 - What is the logic behind only 60 new dwellings until 2036? It appears the Steering Group have resigned themselves to accepting the 51 houses which already have planning but have set an arbitrary limit to effectively ban any further sizeable developments.

5.6 – How do you know that repairing the pump has not fixed the issue? There has been no flooding since the repair was carried out and Anglia Water maintain their position that there is capacity for further development in the system. If the responsible authority take this view on what basis can a group of parishioners state, as a matter of fact, that they are wrong?

5.8 – The plan included clearly shows 7 sites were put forward in the “Call for Sites”. Of these 7 only 2 have planning permission, 3 were those recently refused and 2 have never actually come forward for planning.

5.11 – The language used in this paragraph is inflammatory at best... Either way, it is true that some members of the community have voiced their opinion. It is also true that a significant number of villagers are not willing to risk being abused at public meetings and so have remained silent. It is hard to see how 144 respondents out of (presumably) a possible c. 1,000 can be used as evidence that residents have “taken those opportunities on board”.

5.17 – Two of these “windfall” sites have already been built! This is a relief as the plan now evidently allows for another 11 houses to obtain planning in the next 17 years – much better than the 9 that the Steering Group apparently planned on.

5.22 – Why has data been quoted from 3 different sources and then compared? Surely one source can be found to ensure consistency in approach... Either way, how can it be acceptable for Fressingfield to have an average house price £100k higher than the rest of Suffolk. The Steering Group can surely see that this one fact alone is evidence that there is a dire shortage of housing in Fressingfield. To not allow further development will only make this issue worse and condemn Fressingfield to housing wealthy retirees from other parts of the country rather than providing an opportunity for the next generation of villagers to own their own homes in the place they were raised.

Do you agree with Policy FRES1 – Housing Provision

NO

This policy is nothing short of a total ban on further development and would ultimately lead to the stagnation of a village which has successfully grown and adapted for generations.

Do you agree with Policy FRES2 – Housing Mix

YES

Nothing wrong with this policy but it is unclear on why it is needed. If FRES1 is enforced then there will be no new development within the village to provide a mix of housing.

It would be good to see “self build” housing being encouraged as this is likely to be the only viable route into the local property market for a number of local people.

Do you agree with Policy FRES 3 – Infrastructure

YES

Again, nothing wrong with this policy but it is largely irrelevant given the FRES1. How do the Steering Group expect the infrastructure to improve in Fressingfield if you will not let the village grow..?

This principle applies across the whole sphere of “Infrastructure” but to provide two specific examples of the lack of logic on display here:

1. The local school is currently so low on numbers they are planning to lose a teacher next year. In what way does restricting development in the village help the school?
2. The NHS have historically directed support towards practices serving larger numbers of

patients (>3000). If Fressingfield's population remains static but ages (putting more pressure on the practice) how do you expect services to improve? It would seem the most likely outcome would be for the whole practice to be moved to one of the nearby towns.	
Do you agree with Policy FRES4 - Community Facilities	NO
I don't disagree with the principles of this policy but the reality is that if FRES1 is implemented then the pub and shop will struggle to survive the plan period. It seems overly harsh to require the owners to advertise for 12 months before allowing them to mitigate their losses by redeveloping their sites.	
Do you agree with Policy FRES5 – Fressingfield Hub	YES / NO
No real opinion but it is unclear on how this will be paid for... If grant funding can be obtained then this seems a sensible proposal but why any public funds would be directed to a stagnating village is unclear.	
Do you have any general comments on Chapter 6 – The Natural, Historic and Built Environment	No
Do you agree with Policy FRES6 - Landscape Character and Village Gateways/Entrances	NO
<p>The views selected seem to have been specifically chosen to eliminate specific sites.</p> <p>The view from the west is mostly of new build houses on Chapel Close – what is the point of protecting this?</p> <p>The view from Stradbroke Road is of the Laurels (new build) and the Sports & Social Club. Perhaps the Steering Group are protecting the view of the field but presumably anyone entering Fressingfield from any direction will have seen thousands of acres of fields before arriving!</p> <p>I can understand protecting the view of the church from Harleston Hill but given the orientation of the road it is unclear how this view could be obscured.</p> <p>If the village boundary moves through development (as it has done numerous times over the centuries) the views from all directions will still be of fields leading into a settlement.</p>	
Do you agree with Policy FRES7 - Local Green Spaces	YES / NO
It is a relief to see that Post Mill Lane was not included in the final list of Local Green Spaces. The comments included in the appraisal for this parcel of land show a clear desire to manipulate this plan to restrict future development of the site based on erroneous comment from a Councillor at the planning meeting.	

All information collected and processed by the Parish Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended). Please note: All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information provided will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit the Parish Council Website or speak to the Clerk.

Do you agree with Policy FRES8 – Non Designated Heritage Assets?	YES / NO
<p>It is nice to see that the efforts of C. E. Davidson Limited in renovating the Old Post Office have been appreciated – if only there had been a neighbourhood plan in place to tell us what to do!</p> <p>Why has the pill box on Abbey Hill not been included?</p>	
Do you agree with Policy FRES9 – Fressingfield Vernacular ?	NO
<p>This appears to be a list of items the Steering Group members like with only passing reference to the actual architectural heritage of the village.</p> <p>Flint walling is not a common feature in Fressingfield - there are only two flint houses in the main village of Fressingfield and the wall photographed is a Persimmon Homes construction from the 90s... Whilst flint walling is lovely it is more associated with North Norfolk than Suffolk.</p> <p>Wall paneling and pargetting are very rare in Fressingfield. The latter is particularly associated with Essex / South Suffolk rather than North Suffolk. The house photographed is a new build and whilst it is nice it seems a stretch to call it Fressingfield Vernacular.</p> <p>Brick arches are fine but the photograph clearly shows that the original house had straight lintels with the later addition being arched.</p> <p>Decorative barge boards are unusual... just because there are some in Fressingfield doesn't make it any more the vernacular than simple barge boards.</p> <p>There is no mention of feather edge boarding, painted render or timber frames all of which are traditional building styles typical of Fressingfield and the area.</p>	
Do you agree with Policy FRES10 - Design ?	YES
<p>Unclear why this is necessary though – all of the 208 houses applied for would have met this criteria.</p>	
Do you agree with Policy FRES11 - Localised Flooding ?	NO
<p>I don't disagree with the policy but don't see why it is needed. Anglia Water, the Environment Agency and Suffolk County Council already have responsibility for ensuring these issues are dealt with as part of the planning process, why is it necessary to duplicate their efforts.</p> <p>There is no rationale for a local perspective either. Water flows downhill wherever you are...</p> <p>There seems to be an assumption that Anglia Water fixing their pumping station has not solved the problem but it is not clear what evidence this is based on.</p> <p>The flooding on Stradbroke Road / School Lane is a completely separate issue to the flooding on Low Road. The pipe here blocks for want of a basket to catch debris so not exactly a relevant issue for new development.</p>	
Do you agree with Policy FRES12 - Climate Change, Energy Efficiency, Low Carbon Technology and Renewable Energy	YES / NO
<p>No comment</p>	

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Do you have any general comments on Chapter 7 – Economic Development & Transport ?	YES
<p>This section gives the impression that there is limited employment in and around Fressingfield and even implies that existing employers “will simply cease to be viable”. At no point are the larger employers in and around the village mentioned and the whole section shows a distinct lack of understanding of the underlying economy of the village.</p> <p>C. E. Davidson Limited is registered in Fressingfield and employs 55 people with approximately 50 subcontractors provided with work at any one time, Tiddlywinks nursery employs c. 20 people, a number of employers of c. 10 people not to mention the significant employment available within 5km mentioned in my comment on Chapters 1-3.</p> <p>Employers fed back “concerns over a lack of housing to accommodate the labour force” as part of the consultation and this is a view that we would echo. Our workforce has historically been drawn from Fressingfield and the surrounding area but our employees are simply being priced out of Fressingfield.</p> <p>(For the avoidance of doubt, the average wage of a C. E. Davidson Limited employee is above the national, county and district average so it would not be unreasonable to expect our employees to be able to afford to live in the village where they are employed.)</p> <p>As an aside, 2/3 of the village in employment, 1/3 self employed and 1/3 retired adds up to more than 1 (7.5).</p>	
Do you agree with Policy FRES13 – Existing and New Business?	NO
<p>This policy seems to have been written with no real understanding of the type of business that exists in and around Fressingfield.</p> <p>The term “appropriate scale” is vague and provides no comfort that buildings of the scale required to expand our business (and others like us) would be supported.</p>	
Do you agree with Policy FRES14 – Enhancement and Redevelopment Opportunities?	YES / NO
<p>It is unclear where these brownfield sites are.</p>	
Do you agree with Policy FRES15 – Transport and Highway Safety?	YES / NO
<p>No real opinion. I don’t agree with the premise of the policy but in itself it is ok. Ultimately Suffolk Highways are responsible for monitoring the impact of development on highway safety and it would seem more appropriate to leave them to it.</p>	

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Do you have any comments on the Character Appraisal?	YES
See above comments for Post Mill Lane.	

All information collected and processed by the Parish Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended). Please note: All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information provided will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit the Parish Council Website or speak to the Clerk.

(12) NWA Planning



Response Form

Fressingfield Neighbourhood Development Plan 2018 - 2036

The Neighbourhood Planning (General) Regulations 2012 - Regulation 16 (as amended)

Fressingfield Parish Council have prepared a Neighbourhood Development Plan which sets out a vision for the parish and policies which will be used to determine planning applications locally.

The draft Fressingfield Neighbourhood Plan and supporting documents are available to view on the District Council website at: www.midsuffolk.gov.uk/FressingfieldNP

Printed copies of the Plan and other required submission documents may also be inspected during normal opening hours at the following locations:

- The Village Stores, New Street, Fressingfield, IP21 5PG
- Sancroft Hall, Back Road, Fressingfield IP21 5PN
- The Medical Centre, New Street, IP21 5PJ

How to submit your comments

All comments must be received by 4:00pm on Friday 27 September 2019

- Please complete Section One in full so that your representation can be taken into account at the Neighbourhood Plan Examination stage.
- Please complete Section Two, identifying which paragraph or policy your comments relate to. You may comment on the content of more than one paragraph or policy but please be clear by making the appropriate cross references. (Use separate forms if necessary)
- E-mail your completed response form to: communityplanning@baberghmidsuffolk.gov.uk, or
- Post your completed response form to: 'Fressingfield NP Consultation', c/o Mr Paul Bryant, Spatial Planning Policy Team, Babergh & Mid Suffolk District Council, Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

Please note: It will not be possible to accept late representations.

All comments received will be forwarded on to the appointed Examiner. You should not assume that there will be a further opportunity to introduce new information, although the Examiner may seek clarity on matters identified for examination.

All information collected and processed by the District Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended). Please note: All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information provided will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our website or call customer services on (0300) 123 4000 and ask to speak to the Information Governance Officer.

For Office use only:

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:	Neil Ward
Job Title (if applicable):	
Organisation / Company (if applicable):	NWA Planning
Address:	Globe House 4 St Georges Street Ipswich
Postcode:	IP13LH
Tel No:	01473213523
E-mail:	neil.ward@nwaplanning.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	F.G.Brown & Sons
Address:	c/o Agent
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.	FRES1/Map 5.1
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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:

The plan provides for insufficient housing land to meet the needs of the village over the plan period and to make positive contribution to sustainability and community needs.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Additional land should be allocated for housing development off John Shepherd Road (27 dwellings approx.) and fronting Stradbroke Road (9 dwellings) as part of a mixed use scheme which also makes provision for improved village retail and medical facilities. Land should be allocated for these purposes in accordance with the attached plans.

(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.

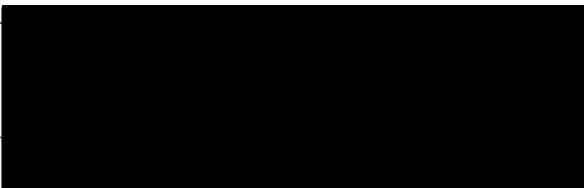
I consider that a hearing should be held because ...

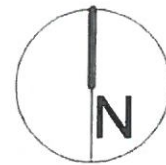
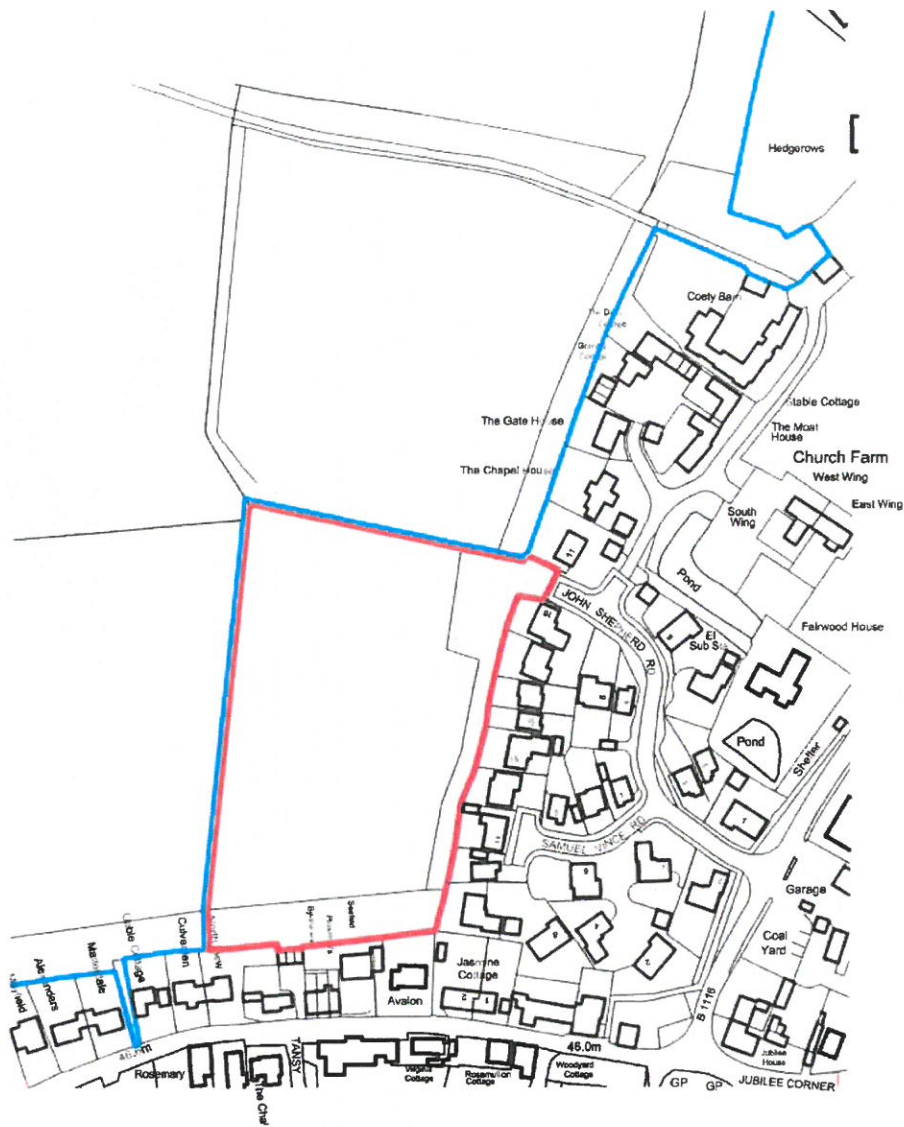
The future of the village should be considered in a forum which allows proper investigation of the basis for the Plan's proposals in the light of the Local Plan Policies when they have reached a sufficiently advanced stage to be given substantial weight. This does not apply at the present time and the Neighbourhood Plan must therefore be considered premature.

(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 Fressingfield NP by Mid Suffolk DC	<input checked="" type="checkbox"/>

Signed: 	Dated: 27.09.2019
--	--------------------------



0 100m
SCALE - 1:2500 @ A4

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LOCATION PLAN

Land at John Shepherd Road
Fressingfield

September 2019



Poole and Pattle Chartered Architects
5 Observation Court, 84 Princes Street, Ipswich, Suffolk. IP1 1RY
t: 01473 230580 w: pooleandpattle.co.uk

John Shepherd Road Fressingfield Indicative layout plan



0 50m

SCALE - 1:500 @ A1

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Proposed development Drawing 3382-10E





SCALE - 1:2500 @ A4

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LOCATION PLAN

Land at Stradbroke Road
 Fressingfield

September 2019



Poole and Pattle Chartered Architects
 5 Observation Court, 84 Princes Street, Ipswich, Suffolk. IP1 1RY
 t: 01473 230580 w: pooleandpattle.co.uk

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

Part A: Respondent	
Title / Name:	Neil Ward
Job Title (if applicable):	
Organisation / Company (if applicable):	NWA Planning
Address:	Globe House 4 St Georges Street Ipswich
Postcode:	IP13LH
Tel No:	01473213523
E-mail:	neil.ward@nwaplanning.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	F.G.Brown & Sons
Address:	c/o Agent
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.	FRES4
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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 Plan should be amended to make specific provision for re-location of the existing medical centre which is operating on a cramped site with no space for growth or improvement.

The Plan should also make provision for the provision of improved retail floorspace to meet the needs of the village.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Provision should be made in Stradbroke Road in accordance with the attached 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 ...

The issue of community needs and related benefits related to new medical centre and retail provisions should be given more detailed consideration.

(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 Fressingfield NP by Mid Suffolk DC	<input checked="" type="checkbox"/>

Signed: 	Dated: 27.09.2019
--	--------------------------



Proposed development

Indicative site plan

Stradbroke Road

Fressingfield

Drawing 3383-12B

0 50m
SCALE 1:1500 @ A1



Fressingfield NP Consultation, c/o Mr Paul Bryant
Spatial Planning Policy Team
Babergh & Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Gladman House, Alexandria Way
Congleton Business Park
Congleton, Cheshire
CW12 1LB

T: 01260 288800
F: 01260 288801

www.gladman.co.uk

By email only to: communityplanning@baberghmidsuffolk.gov.uk

23rd September 2019

Re: Fressingfield Neighbourhood Plan Submission (Reg 16) Consultation

Dear Sir/Madam,

This letter provides Gladman Developments Ltd (Gladman) representations in response to the draft version of the Fressingfield Neighbourhood Development Plan (FNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation and examination of numerous plans across the country, it is from this experience that these representations are prepared.

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in §8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the FNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.
- (d) The making of the order contributes to the achievement of sustainable development.
- (e) The making of the order 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).
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.
- (g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

Revised National Planning Policy Framework

On the 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy.

§214 of the revised Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24th January 2019. Clearly, submission of the FNP will occur after this date, and the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2018 and corrected in February 2019.

National Planning Policy Framework and Planning Practice Guidance

On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework (NPPF2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF2018 consultation. On 19th February 2019, MHCLG published a further revision to the NPPF (2019) and implements further changes to national policy.

The Revised Framework sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of neighbourhood plans within which locally-prepared plans for housing and other development can be produced. Crucially, the changes to national policy reaffirm the Government's commitment to ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 13 states that:

“The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”

Paragraph 14 further states that:

“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

- a. The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;**
- b. The neighbourhood plan contains policies and allocations to meet its identified housing requirement;**
- c. The local planning authority has at least a three-year supply of deliverable housing sites (against its five-year supply requirement, including the appropriate buffer as set out in paragraph 73); and**
- d. The local planning authority's housing delivery was at least 45% of that required over the previous three years.”**

The Revised Framework also sets out how neighbourhood planning provides local communities with the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing needs. Neighbourhood plans should not promote less development than set out in Local Plans and should not seek to undermine those strategic policies. Where the strategic policy making authority identifies a housing requirement for a neighbourhood area, the neighbourhood plan should seek to meet this figure in full as a minimum. Where it is not possible for a housing requirement figure to be provided i.e. where a neighbourhood plan has progressed following the adoption of a Local Plan, then the neighbourhood planning body should request an indicative figure to plan taking into account the latest evidence of housing need, population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

In order to proceed to referendum, the neighbourhood plan will need to be tested through independent examination in order to demonstrate that they are compliant with the basic conditions and other legal requirements before they can come into force. If the Examiner identifies that the neighbourhood plan does not meet the basic conditions as submitted, the plan may not be able to proceed to referendum.

Planning Practice Guidance

Following the publication of the NPPF2018, the Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018 with further updates being made in the intervening period. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans.

Although a draft neighbourhood plan must be in general conformity with the strategic policies of the adopted development plan, it is important for the neighbourhood plan to provide flexibility and give consideration to the reasoning and evidence informing the emerging Local Plan which will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against. For example, the neighbourhood planning body should take into consideration up-to-date housing needs evidence as this will be relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan¹. This should be undertaken through a positive and proactive approach working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan.

It is important the neighbourhood plan sets out a positive approach to development in their area by working in partnership with local planning authorities, landowners and developers to identify their housing need figure and identifying sufficient land to meet this requirement as a minimum. Furthermore, it is important that policies contained in

¹ PPG Reference ID: 41-009-20160211

the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities from coming forward. Indeed, the PPG emphasises that;

“A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlements will need to be supported by robust evidence of their appropriateness”²

Relationship to Local Plan

To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. That relevant to the preparation of the FNP is the Mid Suffolk Core Strategy (MSCS) which was adopted 2008 and sets out the strategic planning policy framework for the district until 2027. The Core Strategy Focussed Review was adopted 2012. The Core Strategy determined that Mid Suffolk would be required to deliver 8,525 dwellings between 2007 and 2027.

The Council is currently consulting, until 30th September, on the Joint Babergh and Mid Suffolk Local Plan (JBMSLP) 2014 to 2036 to which Gladman will submit detailed representations. This version supersedes that used to inform the current consultation version of the FNP and it is important that policies contained in the FNP allow for flexibility so that they are able to respond positively to changes in circumstance that may arise over the course of the plan period. This degree of flexibility is required to ensure that the FNP is capable of being effective over the duration of its plan period, so it is not ultimately superseded by the emerging Local Plan as s38(5) of the Planning and Compulsory Purchase Act 2004 states that:

“if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).”

Fressingfield Neighbourhood Development Plan

This section highlights the key issue that Gladman would like to raise with regards to the content of the FNP as currently proposed. It is considered the requirements of national policy and guidance are not always reflected in the plan. Gladman have sought to recommend a modification to ensure compliance with basic conditions.

Policy FRES1 – Housing Provision

This Policy allocates two sites for housing and identifies a settlement boundary for Fressingfield, stating that land outside of this defined area will be protected unless there is an identified local need. Gladman object to the use of settlement boundaries if these preclude otherwise sustainable development from coming forward. The Framework is clear that sustainable development should proceed. Use of settlement limits to arbitrarily restrict suitable development from

² Paragraph: 009 Reference ID: 67-009-20190722

coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a) and (d).

As currently drafted, this is considered to be an overly restrictive approach and provides no flexibility to reflect the circumstances upon which the FNP is being prepared. Greater flexibility is required in this policy and Gladman suggest that additional sites adjacent to the settlement boundary should be considered as appropriate. Gladman recommend that the above policy is modified so that it allows for a degree of flexibility. The following wording is put forward for consideration:

“When considering development proposals, the Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Neighbourhood Plan will be supported particularly where they provide:

New homes including market and affordable housing; or

Opportunities for new business facilities through new or expanded premises; or

Infrastructure to ensure the continued vitality and viability of the neighbourhood area.

Development adjacent to the existing settlement will be permitted provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.”

Indeed, this approach was taken in the examination of the Godmanchester Neighbourhood Plan. Paragraph 4.12 of the Examiner’s Report states:

“...Policy GMC1 should be modified to state that “Development ...shall be focused within or adjoining the settlement boundary as identified in the plan.” It should be made clear that any new development should be either infill or of a minor or moderate scale, so that the local distinctiveness of the settlement is not compromised. PM2 should be made to achieve this flexibility and ensure regard is had to the NPPF and the promotion of sustainable development. PM2 is also needed to ensure that the GNP will be in general conformity with the aims for new housing development in the Core Strategy and align with similar aims in the emerging Local Plan.”

Policy FRES2 – Housing size, type and tenure

Whilst Gladman note the housing types proposed through this policy to accommodate a range of groups, particularly the elderly and the young, it should be recognised that housing needs do change over time. We suggest wording is added to the policy to allow flexibility for changing needs to ensure the Plan is able to respond positively to changes in circumstance which may arise over the plan period. Gladman suggest adding the wording 'This should be evidenced through an up to date assessment' to this policy.

FRES6 – Protecting landscape character and natural assets and enhancing village gateways/entrances

This policy identifies 4 views which the plan makers consider are important for the setting and character of Fressingfield and goes onto state that it would not support development proposals adversely affecting them.

Identified views must be supported by evidence and ensure that they demonstrate a physical attribute elevating a view's importance beyond simply being a nice view of open countryside. The evidence base to support the policy does little to indicate why these views are important and why they should be protected, other than providing a view of the settlement and surrounding fields and woodland. It therefore lacks the proportionate and robust evidence required by the PPG.

Gladman consider that to be an important view that should be protected, it must have some form of additional quality that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support. Gladman therefore suggests this element of the policy is deleted as it does not provide clarity and support for a decision maker to apply the policy predictably and with confidence. It is therefore contrary to paragraph 16(d) of the Framework.

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the FNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic condition (a) in its conformity with national policy and guidance and is contrary to (d) the making of the order contributes to the achievement of sustainable development for the reasons set out above.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours faithfully,

Paul Emms
Gladman Developments Ltd.