

Mid Suffolk District Council

Haughley Neighbourhood Development Plan

Submission Consultation Responses



In December 2018 Haughley 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 21 January until Wednesday 6 March 2019.

In total, 12 organisations submitted representations. These 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)	Highways England
(6)	Anglian Water
(7)	National Grid
(8)	Wetherden Parish Council
(9)	Pegasus Planning (obo Amber REI Ltd)
(10)	Catesby Estates plc c/o Strutt & Parker
(11)	Richard Brown Planning Ltd (obo Christchurch Property Company Ltd)
(12)	Gladman Developments Ltd

(1) Suffolk County Council

Date: 6th March 2019
Enquiries to: Cameron Clow
Tel: 01473 260171
Email: Cameron.clow@suffolk.gov.uk



Mid Suffolk District Council
Endeavour House
8 Russel Road
Ipswich
IP1 2BX

Dear Robert Hobbs

Submission version of the Haughley Neighbourhood Plan

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

A number of the recommendations made by SCC in the regulation 14 consultation have been incorporated into the plan, which is welcome. However further work has taken place to understand the capabilities of expanding the primary school, which will have an impact on the plan. There are also issues regarding provision of early years within the plan, which were highlighted in the previous consultation stage. This letter details those issues and possible options.

SCC would like to be in a position where it can support the Neighbourhood Plan, however we considers that in advance of proposals to manage primary education requirements, the Plan does not meet the Basic Conditions required to proceed to referendum.

During the regulation 14 consultation SCC presented the pupil forecasts for Haughley Crawford's Primary School (see below) and stated that a study would be undertaken to investigate the possibility of expanding the school.

A feasibility study to assess how the school might expand to 140 places was undertaken (equating to 20 pupils per year group) and it was determined that it is not possible to expand the school. The current school is already below the space standards set out in Government guidance (Building Bulletin 103) and expanding the school would exacerbate this situation. This was also explained in the letter from the SCC to Mid Suffolk District Council on the 9th November 2018, when it placed a holding objection on the application for 65 dwellings on the land west of Fishponds Way (DC18/04/0477). This was reiterated in a letter sent by SCC to Mid Suffolk District Council, which stated it prefers that the Local Planning Authority to refuse the scheme as it would create an unsustainable primary school situation, necessitating transport of pupils out of the village to other schools.

As such, there is no current ability to meet primary education demand that would arise from the proposed development in the plan, other than transporting children to other villages. The level of housing growth proposed would not be sufficient to enable a new (i.e. additional) primary school or the relocation of the existing Crawford's CEVCP school to a different site.

There are a number of options that could be considered for the Plan, in no particular order:

- **Increasing planned housing growth** – Housing could be allocated to a level that enables relocation of the primary school and provision of an early years site. In order to provide contributions from development for a new school and early years facilities, there would need to be a significant amount of additional development and identification of a funding source for the cost of relocating the existing school places which does not include the cost of relocating the existing school places which would have to be borne by the taxpayer. SCC does not currently have identified funding to enable this to take place. There would also be other significant infrastructure requirements for growth of this size and given the objectives of the plan it seems unlikely that growth of this scale would be desirable.
- **No growth beyond already permitted sites** – Currently, the only permitted site of the allocations in Haughley is Land at Green Road (policy HAU3 and DC/17/04113/OUT). It is expected that seven pupils would result from this development, bringing the pupil role to 99 in 2022, resulting in one surplus place (For school place planning purposes SCC use 95% as the schools capacity). With no growth beyond this site the plan would not cause any more capacity issues. However, on balance further growth might be able to provide other benefits to Haughley (such as providing homes for local people), so restricting growth in this way may not be appropriate.
- **Allocating land for further housing growth with a specified dwelling mix which would create less demand for pupil places** – certain sizes of dwellings, or dwellings aimed at certain demographics, could lower the overall education demand. This includes homes for older people (such as sheltered housing, extra care housing, or care homes), or dwellings with one bedroom. It is noted that Policy HAU2 sets preference for small dwellings and bungalows, however there is not sufficient detail in this policy or evidence to identify a specific housing mix. It may also not be possible to specify a housing mix which produces only one primary school pupil (the remaining capacity in 2022 following construction of Land at Green Road).
- **Introducing site phasing into the plan** – site phasing would specify when allocated sites can come forward, effectively staggering delivery of houses to match the availability of school and early years places arises, over a longer period of time. This would have the effect of making sites undeliverable until such time as capacity is available at the school. Other neighbourhood plans have attempted to include site phasing. One example is Debenham, however when examined the inspector recommended removal of the phasing, as it is preferred that the market decide when sites come forward. However due to the education infrastructure limitations and the limited scope to overcome these through the preferred scale of growth there may be a case for this approach in Haughley.

The National Planning Policy Framework (NPPF) states in paragraph 94 that “It is important that a sufficient choice of school places is available to meet the needs of new and existing communities”. Should development go forward as currently drafted in the plan there would not be the option for children to attend their most local school. Pupils would be required to travel outside of the village to access education, which is not “limiting the need for travel” (NPPF paragraph 103).

As currently drafted SCC finds that the plan does not meet the Basic Conditions of having regard to national policies and contributing to the achievement of sustainable development.

There is also challenge meeting the demand for early years need which arises from the plan. The current early years provision is in the village hall, which is shared with other uses, so is not ideal. The level of growth proposed in the plan would not enable the provision of a new independent setting, so SCC will consider CIL bids for enhancing the existing setting.

However, SCC is willing to work with the community, Neighbourhood Plan group, and Local Planning Authority in order to proactively plan for sustainable development in Haughley. If there is anything in my letter you wish to discuss, please use the contact details at the top of this letter.

Yours sincerely,

Cameron Clow
Planning Officer
Growth, Highways and Infrastructure

Date: 24 January 2019
Our ref: 270982



Paul Bryant
Mid Suffolk District Council
communityplanning@baberghmidsuffolk.gov.uk

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

BY EMAIL ONLY

T 0300 060 3900

Dear Mr Bryant

Haughley Neighbourhood Plan - Publication of draft plan consultation (Reg 16)

Thank you for your consultation on the above dated 18 January 2019

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

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

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

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

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

Yours sincerely

Alice Watson
Consultations Team

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

Natural environment information sources

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

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

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

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

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

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

Natural environment issues to consider

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

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

Landscape

¹ <http://magic.defra.gov.uk/>

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

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

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

⁵ <http://magic.defra.gov.uk/>

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

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

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

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

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

Wildlife habitats

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

Priority and protected species

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

Best and Most Versatile Agricultural Land

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

Improving your natural environment

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

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

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

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>

- 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



EAST OF ENGLAND OFFICE

Mr Paul Bryant
Babergh & Mid Suffolk District Councils
Corks Lane
Hadleigh
Ipswich
IP7 6SJ

Direct Dial: [REDACTED]

Our ref: PL00427382

1 March 2019

Dear Mr Bryant

Ref: Haughley Neighbourhood Plan Regulation 16 Consultation

Thank you for your correspondence dated 18 January 2019 inviting Historic England to comment on the Regulation 16 Submission version of the Haughley Neighbourhood Plan.

We welcome the production of this neighbourhood plan, and are pleased to note that the historic environment of the parish is referred to throughout, including a strong policy emphasis on protecting and enhancing Haughley's heritage assets. We welcome the principle underpinning policy HAU10, but suggest the policy should be reworded slightly to align it with the relative weight given to different levels of harm to heritage assets in paragraphs 195 and 196 of the National Planning Policy Framework (2019), as well as the wording of s72 the Planning (Listed Buildings and Conservation Areas) Act 1990 with regard to conservation areas. We suggest the the following wording:

"All proposals for new development [...] will be expected to demonstrate that they have explored the potential to better reveal the significance of the historic environment, and that the proposals will preserve or, where possible, enhance the positive attributes of the Heritage Assets potentially affected.

Development that will harm a Heritage Asset either directly, or through development in its setting, will not be supported unless that harm is clearly and convincingly justified by public benefits".

We do not wish to make any further detailed comments at this time, but congratulate those involved in the production of this plan. For further information, we would refer you to our previous advice submitted at Regulation 14 stage, and for any further information to our detailed guidance 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



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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

CC:

(4) Environment Agency



Mr Paul Bryant
Suffolk County Council
Property
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2019/123762/01-L01

Your ref: Reg 16

Date: 06 March 2019

Dear Mr Bryant

Thank you for your letter relating to the Haughley 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/LI_T_2745_c8ed3d.pdf

Groundwater Contamination

The Neighbourhood plan section 11.28 discusses the Neighbourhood need for future expansion of the St Mary's church burial grounds. We wish to advise that due to the

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

Cont/d..

groundwater conditions of Haughley this would require planning permission and the application will need to be accompanied by a tier 1 assessment, and possibly require a tier 2 assessment. This is to ensure that the cemetery does not pollute groundwater in the area. More information relating to cemeteries and groundwater can be found [Here](#). The Neighbourhood plan should include the minimum groundwater conditions in CND3 regarding extensions to burial sites.

We also wish to refer back to our previous response to the regulation 14 consultation period. Our comments relating to Flood risk, potentially contaminating development and Natural Capital all remain relevant and applicable to this 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 may come forward. We reserve the right to change our position in relation to any such application.

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

We trust this advice is helpful.

Yours sincerely

Miss Natalie Kermath
Planning Advisor

Direct dial [REDACTED]
Direct e-mail natalie.kermath@environment-agency.gov.uk



Our ref: Haughley P
Your ref:

Paul Bryant
Neighbourhood Planning Officer
Babergh & Mid Suffok District Council
Via email

Mark Norman
Operations - East
Woodlands
Manton Lane
Bedford MK41 7LW

Direct Line: XXXXXXXXXXXXX

11 February 2019

Dear Sir,

neighbourhood plan consultation

Thank you for your consultation. Your plan promotes sustainable transport, and this is welcomed, it also fits with the wider policy of Babergh and Mid Suffolk local plan as such impacts on the Strategic Road Network A14 in this case are taken account in their evidence base. Therefore, we have no comment to make on the plan.

Yours faithfully

Mark Norman
Assistant Asset Manager
Operations (East)
Email: mark.norman@highwaysengland.co.uk

Response Form

Haughley [Parish] Neighbourhood Development Plan 2016 - 2036

Section One: Respondents Details

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

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

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

Section Two: Your representation(s)

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

Paragraph No.		Policy No.	HAU1
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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:

Anglian Water is supportive of Policy HAU1 as it states that planning permission will only be granted if it can be demonstrated that there is, or will be sufficient capacity both within the foul sewerage network and water supply network for the proposed development.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

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

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

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

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

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

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	✓
The final 'making' (adoption) of the Haughley NDP by Mid Suffolk District Council	✓

Signed: Stewart Patience

Dated: 28th February 2019

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.	HAU3
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

We previously sought the inclusion of additional text to include reference to assessing potential impacts on Anglian Water's existing infrastructure.

Further text has been added to Policy HAU3 in response to these comments and is supported.

(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.

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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 Haughley NDP by Mid Suffolk District Council	✓

Signed: Stewart Patience

Dated: 28th February 2019

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.	HAU4
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

We previously sought the inclusion of additional text to include reference to assessing potential impacts on Anglian Water's existing infrastructure.

Further text has been added to Policy HAU4 in response to these comments and is supported.

(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.

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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 Haughley NDP by Mid Suffolk District Council	✓

Signed: Stewart Patience	Dated: 28th February 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.		Policy No.	HAU5
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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:

In our previous comments we had highlighted that this proposed residential allocation is in close proximity to a water recycling centre in Anglian Water's ownership which is located to the west of the allocation site and this is a potential constraint to the development of this site.

Nuisance may be caused by noise, lighting and traffic movements but its most prevalent source will be odours, unavoidably generated by the treatment of sewerage.

Our concern is to prevent encroachment of occupied land and buildings which could give rise to future amenity loss and impose additional constraints on the operation of our assets. Planning permission should only be granted where it has been demonstrated that the proposed development would not be adversely affected by the normal operation of our operational assets.

We had asked that further consideration to be given to this issue by the Parish Council prior to submission of the plan. The Consultation Statement states that the previous comments are noted although no specific actions are proposed.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

It is suggested that Policy HAU5 should be amended to include the following wording:

'Demonstrate that residents are not adversely affected from a risk of amenity impacts particularly odour from the existing water recycling centre and that the continuous operation of the WRC is not prejudiced.'

(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 Haughley NDP by Mid Suffolk District Council	✓

Signed: Stewart Patience	Dated: 28th February 2019
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Haughley NP Consultation
c/o Mr Paul Bryant
Spatial Planning Policy Team
Babergh and Mid Suffolk DC
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Lucy Bartley
Consultant Town Planner

Tel: 01926 439116
n.grid@woodplc.com

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

07 February 2019

Dear Sir / Madam

**Haughley 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 owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

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 our assets.

Assets in your area

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

- **FM05 - Yelverton to Stowmarket**

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



Gas Distribution – Low / Medium Pressure

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

Electricity distribution

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

Key resources / contacts

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

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
Gables House
Kenilworth Road
Leamington Spa
Warwickshire
CV32 6JX

Spencer Jefferies
Development Liaison Officer, National Grid

box.landandacquisitions@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
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




(8) Wetherden Parish Council

Response Form

Haughley [Parish] Neighbourhood Development Plan 2016 - 2036

Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	Chris Harcourt
Job Title (if applicable):	Chair Wetherden Parish Council
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 Support with modifications Oppose Have Comments

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

Having read through the document I believe Haughley PC are proposing a controlled development of available land in and around the village, that will enhance the village. Obviously a major concern will be being able to accommodate the anticipated increase in numbers of school age children. It will be important to ensure village children stay in the village for school, if you can't the village will be come just another satellite village.

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

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 ..

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 Haughley NDP by Mid Suffolk District Council	

Signed: Chris Harcourt	Dated: 28th February 2019
-------------------------------	---

(9) Pegasus Group (obo Amber REI Ltd)

Response Form

Haughley [Parish] Neighbourhood Development Plan 2016 - 2036

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

Part A: Respondent	
Title / Name:	Shaun McCarthy
Job Title (if applicable):	Technical Director
Organisation / Company (if applicable):	Amber REI Ltd
Address:	C/O Agent
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	David Onions, Pegasus Group
Address:	5 The Priors Old London Road Canwell Sutton Coldfield Birmingham
Postcode:	B75 5SH
Tel No:	0121 308 9570
E-mail:	david.onions@pegasusgroup.co.uk

Section Two: Your representation(s)

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

Paragraph No.	-	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:

Please see accompanying representation which follows the format of the NDP as drafted.

What improvements or modifications would you suggest?

Please see accompanying representation which follows the format of the NDP as drafted.

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 ...

At present, it is considered that the NDP does not meet the basic conditions necessary for the NDP to be found sound.

Given the significance of the commercial area of Haughley Park in the context of the remainder of the Parish, but also in the context of a nationally important Listed Building, Amber REI Ltd consider that it is appropriate to hold hearing sessions as part of the examination of the NDP. These sessions would be beneficial in order to ensure the most appropriate and beneficial future of the site for all is secured which, at present, the NDP fails to do. Amber REI Ltd would wish to participate in these sessions.

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

The publication of the recommendations of the Examiner	✓
The final 'making' (adoption) of the Haughley NDP by Mid Suffolk District Council	✓

Signed: David Onions (Pegasus Group)

Dated: 04/03/19

HAUGHLEY NEIGHBOURHOOD PLAN

SUBMISSION (REGULATION 16)

CONSULTATION

21 JANUARY – 6 MARCH 2019

REPRESENTATIONS ON BEHALF OF AMBER REI HOLDINGS LTD

Pegasus Group

5 The Priory | London Road | Canwell | Sutton Coldfield | West Midlands | B75 5SH

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Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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APPENDIX 1: SITE LOCATION PLAN

APPENDIX 2: CONDITION APPRAISAL REPORT

1. INTRODUCTION

- 1.1 This representation is made by Pegasus Group, on behalf of Amber REI Ltd, to respond to the Haughley Neighbourhood Development Plan submission (Regulation 16 of The Neighbourhood Planning [General] Regulations, 2012) version (hereafter referred to as 'the NDP'). This representation is made in relation to the commercial area of Haughley Park (see Site Location Plan at **Appendix 1**).
- 1.2 Haughley Park is identified in the emerging Neighbourhood Plan through Policy HAU6 which concerns '*Sites for Commercial and Industrial Development*'. Amber REI Holdings Ltd own the existing factory at Haughley Park. This is currently non-operational but was previously used as an intensive poultry processing factory. When fully operational the site had a significant workforce and attracted large numbers of HGVs, both of which used local roads. The remaining factory is unattractive and has a detrimental impact upon the setting of the adjacent Haughley Park and Attached Garden Walls, which is collectively Grade I listed (list ID 1181268).
- 1.3 This representation is framed in the context of the basic conditions relevant to the preparation of a Neighbourhood Plan as required by Paragraph 8(1)(a)(2) of Schedule 4B of the Town and Country Planning Act 1990 (inserted by the Localism Act 2011):
- Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - The 'making' of the neighbourhood plan contributes to the achievement of sustainable development;
 - The 'making' of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - The 'making' of a neighbourhood plan does not breach, and is otherwise compatible with EU obligations; and

- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

1.4 This representation concludes that the NDP fails to meet the basic conditions in a number of respects and is therefore not sound. This represents sets out how the NDP should be amended in order to be found sound.

1.5 Given the significance of the commercial area of Haughley Park in the context of the remainder of the Parish, but also in the context of a nationally important Listed Building, Amber REI Ltd consider that it is appropriate to hold hearing sessions as part of the examination of the NDP. Amber REI Ltd would wish to participate in these sessions, in order to ensure the most appropriate and beneficial future of the site for all is secured.

2. THE NEIGHBOURHOOD DEVELOPMENT PLAN

Section 6

- 2.1 Section 6 of the NDP summarises the historical growth of the village of Haughley along with Haughley New Street, along with other areas of the Neighbourhood Plan area. Specifically, paragraph 6.5 identifies that there are 63 listed buildings within the wider Parish of Haughley, whilst paragraph 6.7 briefly alludes to Haughley Park, a Grade I listed manor house of 1620 set in gardens, park and woodland, although it is not mentioned explicitly by name.
- 2.2 Haughley Park and the Church of St Mary the Virgin, Duke Street, Haughley represent the only Grade I listed buildings within the Neighbourhood Plan area and are therefore of significant importance. Grade I listed buildings consist of buildings of exceptional interest and represent only 2.5% of the listed building stock within England.
- 2.3 The significance of the asset of Haughley Park and in particular the adverse impact that the current poultry factory and any potential lawful re-use has on its setting must be a consideration in the Neighbourhood Plan context. This should be recognised within the supporting text.

Section 7

- 2.4 Section 7 lists a number of existing facilities and employment opportunities within the Parish, with paragraph 7.4 referring to Haughley Park, stating that there is an events business, an agricultural contractor and one farm at the site. This description omits the existing poultry factory at the site which, whilst currently vacant, its lawful use in planning terms remains. It could be restarted as a factory processing poultry or as any other general industrial use (Use Class B2) without any need for planning permission. Recognition of the existence of the poultry processing factory must be included within paragraph 7.4.

Section 9

- 2.5 Section 9 concerns the planning policy context within which the NDP is set, including the National Planning Policy Framework (NPPF). Paragraph 9.1 of the NDP confirms that, as the NDP was submitted to the local planning authority prior to

24th January 2019, the provisions of the 2012 revision (rather than the February 2019 revision) NPPF apply.

- 2.6 In paragraphs 9.3 – 9.9 the Neighbourhood Plan summarises key elements of the NPPF. However, the supporting text fails to identify that the re-use of previously developed land is one of the twelve core principles underpinning both plan making and decision taking. The fact that there is a substantial previously developed site at Haughley Park which falls within the Neighbourhood Plan area is a factor which should be recognised in the National Planning Policy Framework section. At present, the NDP fails to have regard to national policies and advice contained in guidance issued by the Secretary of State in this regard.

Section 10

- 2.7 The NDP undertakes a SWOT analysis based upon evidence gathered during local consultation. A clear omission from this analysis is the strength emanating from the availability of a previously developed site at Haughley Park which can limit the need for use of greenfield sites elsewhere within the Neighbourhood Plan area. Furthermore, the Opportunities Section fails to reference the opportunity to be found at Haughley Park, where a previously developed site can be redeveloped to significantly enhance the setting of a Grade I listed heritage asset.
- 2.8 It is also notable that the SWOT analysis has identified both an ageing population and falling school roll as being threats to the ongoing success of the community. Both these threats can be addressed through providing additional housing suitable for families which will support both the local school and other facilities within the Neighbourhood Plan area. However, at the same time there is also a concern in the SWOT analysis over the size of new houses. Generally larger houses tend to be occupied by families with children which would be the type of incoming population needed to address the threats of the ageing population and falling school role. If a key objective of the NDP is to maintain shops and facilities in Haughley and in particular maintain the school roll, then the concerns over the size of new homes will need to diminish. The NDP should reconcile this issue.

3. POLICIES AND PROPOSALS

3.1 Section 11 of the Neighbourhood Plan sets out policies and proposals for Haughley Parish. At paragraph 11.4 the Neighbourhood Plan states: *“away from the centre of the village, limited opportunities for small scale development exist at Haughley Green and Haughley New Street”*. Amber strongly objects to this phrasing as, again, the NDP fails to recognise the substantial previously developed site at Haughley Park. Its redevelopment has particular benefits in removing what is a non-conforming and unattractive factory building, significantly enhancing the setting of the Grade I listed heritage asset and re-using previously developed land. These represent very significant benefits. As a consequence, the NDP must identify the former poultry factory at Haughley Park as one of its key potential new opportunity areas.

3.2 Again, within 11.6 paragraph the Plan refers to the need to protect *‘the environment and landscape value that provides the setting of the village’* outside of settlement boundaries. In such areas, the Neighbourhood Plan states development will not be permitted except in *‘exceptional circumstances’*. It is submitted that this phrasing should be reconsidered, as *‘exceptional circumstances’* is a high-test set out within the NPPF in respect of the Green Belt, rather than homes in the countryside. Furthermore, this is not general conformity with the adopted Mid-Suffolk Core Strategy, which states the following in respect of development beyond the settlement boundary:

“The rest of Mid Suffolk, including settlements not listed above, will be designated as countryside and countryside villages and development will be restricted to particular types of development to support the rural economy, meet affordable housing, community needs and provide renewable energy”.

3.3 A number of types of development are therefore clearly permissible beyond settlement boundaries, in more instances than *‘exceptional circumstances’*.

3.4 Similarly, recent case law has considered the issue of landscape value and what it means for a landscape to be valued. *Stroud DC vs. SSCLG [2015] EWHC 488 (Admin)* is clear that, whilst valued landscapes do not need to have a formal designation, *‘valued’* means something more than just *‘popular’*. Landscape is only *‘valued’* if it has physical attributes which take it out of the ordinary. The Landscape

Institutes' Guidelines for Landscape and Visual Impact Assessment ('the GLVIA') identifies various factors that may be relevant in the assessment of landscape value, including:

- Condition/Quality,
- Scenic Quality,
- Rarity and Representativeness,
- Conservation Interests,
- Recreation Value,
- Perceptual Aspects; and
- Cultural Associations.

3.5 The NDP implies that all landscape beyond the settlement boundary is '*valued*'. Firstly, this is not justified or evidenced against the above criteria and, secondly, if all landscape beyond the settlement boundary demonstrated the same certain qualities, it would not be '*valued*', as those qualities would instead be the inherent '*norm*' or baseline.

3.6 Certainly, the existing factory at Haughley Park cannot be considered to be contributing to the value of any landscape, as it is currently unattractive and is a state of disrepair.

3.7 As such, paragraph 11.6 requires amendment as it fails to have regard to national policy and guidance or the local development plan in respect of development beyond the settlement boundary.

3.8 Furthermore, references should be made in this paragraph to the particular merits of development at the factory premises at Haughley Park and how this can deliver real planning benefits both to the site and to the wider Parish, despite it being located beyond any defined settlement boundary.

3.9 Objective 1 sets out that new housing development in the parish should be provided in a suitable range of tenures, types and sizes so that local people of all ages can continue to live in a suitable home and local needs are met.

- 3.10 Paragraph 11.9 of the NDP identifies that the Plan will deliver a 'maximum' of up to 150 new homes to 2036. It is contented that it is inappropriate to define this figure as a 'maximum', as housing figures contained within Local Development Plans should always be considered as 'minimum' figures.
- 3.11 Irrespective of this, this figure is not robustly justified. The NDP states that this figure is based on *'the role of visual, environmental and capacity views'* and *'subject to all the evidence and community infrastructure'*, making reference to a housing needs survey questionnaire produced in May 2016. There is no empirical or professional evidence produced in respect of landscape, environment, infrastructure capacity or indeed housing need in order to justify this requirement. Amber REI accordingly object to this figure, as it has not been derived in accordance with planning policy or guidance.
- 3.12 The Government has recently introduced a standard method for calculating housing need through national planning guidance, based on the 2014 sub-national household projections. When it progresses, the emerging Joint Local Plan will be required to revisit its housing requirement to accord with the standard methodology. The standard methodology indicates a potential housing need figure of 573 dwellings per annum for Mid Suffolk District (2014-based data), some 121 in excess of their current OAN figure. As such, when the JLP is adopted, the NDP will become out of date in respect of housing need and its relevant policies will be superseded. It is therefore recommended that, whilst the NDP is being examined under the provisions of the 2012 NPPF, it should base its housing figure on the housing requirement for Mid Suffolk District as prescribed by the standard methodology, in order to remain up-to-date in the longer term.
- 3.13 Paragraph 11.11 refers to new housing development meeting the needs of the village for the period to 2036 and will take place on sites that specifically allocated in the Neighbourhood Plan or within settlement boundaries. The Plan recognises that *"within existing settlement boundaries, the opportunities for the construction of new homes is limited"* and *"it is likely that there will be new opportunities that will come forward through the redevelopment of sites"*. Nevertheless, the NDP should be strengthened to reflect the redevelopment opportunity at Haughley Park to deliver new homes in conjunction with the significant benefits identified in removing existing factory buildings. The Plan should be amended to reflect this consideration.

- 3.14 The NDP fails to recognise that development within the wider Neighbourhood Plan area can have benefits in supporting existing facilities within Haughley Village. Whilst this may involve additional car journeys, these journeys are likely to be limited in their length and duration. Government guidance in Manual for Streets (2007) notes that walkable neighbourhoods are characterised by having a range of facilities within 800 metres walking distance, but adds that this is not an upper limit.
- 3.15 The NDP should be redrafted to recognise the wider benefits of development within the Parish which can help support existing facilities within Haughley Village and overall reduce the distances needed to travel. In particular paragraph 11.12 should be revised to take on board these considerations.
- 3.16 Policy HAU1 sets out Haughley’s spatial strategy. It states that, outside settlement boundaries, only development for agriculture and other uses which need to be located in the countryside or supported by other policies in the Plan will be supported. Either a specific policy should be introduced into the Neighbourhood Plan supporting residential development at the former factory at Haughley Park for housing as an allocation in the Neighbourhood Plan, or a policy should be introduced which supported the redevelopment of brownfield sites beyond settlement boundaries.
- 3.17 Paragraphs 11.19 and 11.20 recognise that the site east of King George V playing field has planning permission for 98 dwellings. Consequently, the housing allocation set out in the Policy HAU3 already has planning permission and the site itself does not represent a new housing site. The fact that it already has an outline planning permission means that it would be taken into account in the overall plan making process of the District as a windfall site.
- 3.18 Policy HAU6 identifies sites for commercial and industrial development. It states commercial and industrial development will be supported on the brownfield sites of the previous commercial areas of Haughley Park, with acceptable Use Classes “*B1 and Bs* [sic]”.
- 3.19 Amber objects to this Policy, as it fails to recognise the economic circumstances associated with the redevelopment of the former poultry factory, nor the sensitivity of its location adjacent to a Grade I listed building. The existing factory buildings at Haughley Park and all its associated infrastructure will require considerable

investment in order to make the land suitable for any form of redevelopment (either industrial or residential). Indeed, an industrial development provides much more limited economic returns to the extent that such a proposal will be unviable at this site (see chapter 4 of this representation). This is reinforced by the fact that there are other alternative employment sites coming forward on greenfield sites within the immediate vicinity of Haughley Park, including development of land at Lawn Farm, Warren Lane, Woolpit (planning application reference: DC/18/01279). This application provides for circa 7,100 sqm of employment development on greenfield land located to the west of Haughley Park. This will clearly meet a long-term need for employment development in the area, further rendering the development of Haughley Park for employment uses unviable. It also provides the potential for expansion to allow for new businesses to move onto the site in the longer-term. It is a greenfield site which does not require any demolition or remediation to allow for new development. This is not the case for the former poultry factory at Haughley Park where considerable investment would be required to allow the land to be redeveloped for industrial purposes (further consideration in respect of the cost of redeveloping the site is given in chapter 4 of this representation). The fact that there are alternative employment sites available on a greenfield site close to Haughley Park further undermines the prospect of an employment development at the site.

- 3.20 Furthermore, redevelopment of the site for commercial/industrial development will only perpetuate the harm caused to the existing Grade I listed building both by the presence of utilitarian industrial buildings located immediately adjacent to it, with little in the way of separation or screening, but also due to the impact of HGV traffic.
- 3.21 These circumstances dictate that the site of the former factory at Haughley Park is not suitable for commercial or industrial development. Allocating it for such purposes will only result in the continued harm to the listed Hall and wider environment.
- 3.22 In addition, the NPPF makes clear in paragraph 22 that:

"planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospective of a site being used for that purpose...where there is no reasonable prospect of a site being used for employment use, applications for alternative uses of

land should be treated on their merits having regard to market signals and a relative need for different land uses to support sustainable local communities”.

- 3.23 As has been made clear within this representation, the identification of the former poultry site at Haughley Park for industrial development is unlikely to result in a viable redevelopment of the site for employment purposes and, even if it did, then the harm that would result from such a use would continue to have implications for the surrounding uses and in particular the heritage asset. This again points to the need for a specific new policy proposing residential development at the former poultry factory at Haughley Park.
- 3.24 In view of the above it is submitted that Haughley Park is deleted from Policy HAU6. In addition, a new policy specifically for the former poultry factory at Haughley Park should be included within the Neighbourhood Plan. This should allocate the site as suitable for up to 150 dwellings. The Policy could include associated environmental improvements in and around the site and delivery of additional recreation facilities, landscaping and green space aimed at improving the setting and ambience of the Grade I listed building. The Policy could identify that redevelopment of Haughley Park should be considered in advance of the development of greenfield land adjacent to Haughley Village. This will follow a consistent approach with the NPPF in encouraging the reuse of previously developed land as well as prioritising the significant heritage benefits associated with the Haughley Park redevelopment.
- 3.25 Policy HAU7 sets out that proposals for non-employment uses on sites and premises used and/or designated on the Proposals Maps for employment purposes will only be permitted under specific circumstances. However, the first point then goes on to state: *‘It will not result in a loss of employment provision in the Neighbourhood Plan area’*. This is clearly a direct contradiction to the intention of the policy, as all non-employment uses on employment sites will inherently result in the loss of employment provision in the neighbourhood plan area. As such, no alternative use of employment sites will ever be considered acceptable, irrespective of any merits of such development. This first point is, therefore, not only unreasonable but renders the rest of the policy irrelevant and unworkable.
- 3.26 Aside from the above, many of the criteria set out in Policy HAU7 would be applicable to the poultry factory at Haughley Park. In particular it is clear that

existing use has overriding environmental problems which would be perpetuated through any alternative employment site, particularly on the setting of the Grade I listed building.

- 3.27 Policy HAU9 refers to development affecting Haughley's built heritage assets. As stated previously, Haughley Park represents one of only two Grade I listed buildings within the Neighbourhood Plan area. Policy HAU9 should again refer to Haughley Park and the benefits that could accrue from a redevelopment of the poultry factory site for housing purposes. This could also reflect some of the benefits identified in the masterplan accompanying these representations.

4. FORMER POULTRY PROCESSING PLANT, HAUGHLEY PARK

- 4.1 Amber REI Ltd has recently submitted a planning application (reference: DC/18/03592) to Mid-Suffolk District Council for the development of the Former Poultry Processing Plant, Haughley Park, for 149 dwellings and associated infrastructure, including public open space, playing fields, village greens, green corridors, community orchard, landscaping and surface water attenuation.
- 4.2 This application was heard at the Council's Development Control Committee A on 13th February 2019, where the Committee resolved to refuse planning permission. The single ground of refusal provided relates to the perception that location of the site beyond any defined settlement boundary would result in any residential development being unsustainable in its nature. The ground of refusal acknowledges public benefit of the development, although considers that this benefit does not outweigh the perceived harm identified.
- 4.3 Nevertheless, in respect of Haughley Park and its relationship with the emerging NDP, Paragraph 3.12 of the Case Officer's Report confirms that Mid-Suffolk Council agree *'...that a replacement factory use would be unlikely and not viable. The nature of the buildings would not allow for adaptation and so new commercial buildings would be needed. The removal of the buildings and contamination issues also mean that the cost of redevelopment is likely to be significant and may not allow other commercial uses to be viable on this site'*.
- 4.4 Similarly, Paragraph 7.1 of the Case Officer's Report to committee addresses the issue of heritage, stating: *'It is believed that the factory site helped finance the restoration of the Hall, but today does distract from it. The removal of the buildings would improve the setting and it would be hoped that reserved matters for the proposed housing would not create a new distraction and result in equal detriment'*.
- 4.5 This is supported by a Condition Appraisal Report, produced by Harris Lamb on behalf of Amber in February 2016, which is included at **Appendix 2** to this representation. The report includes an anticipated breakdown of costs expected should the existing premises be refurbished and brought back into use for employment purposes. The report demonstrates that the cost of such works would sum to **£2,625,504**. This renders the reuse of the site for employment purposes unviable.

- 4.6 As set out in chapter 3 of this representation, this is further exacerbated by the fact that other employment development is coming forward on greenfield sites within the area (land at Lawn Farm) meeting a long-term need for employment development in the area. It also provides the potential for expansion to allow for new businesses to move onto the site in the longer-term. It is a greenfield site which does not require any demolition or remediation to allow for new development.
- 4.7 Whilst there would significant cost in clearing and remediating the site for any form of redevelopment, the margins associated with residential development are more generous, rendering this type of development viable.

5. CONCLUSIONS

5.1 The Neighbourhood Plan provides a useful framework in planning for future development within the Haughley Parish Neighbourhood Plan area. However, it fails in a number of respects to meet the basic conditions required by Paragraph 8(1)(a)(2) of Schedule 4B of the Town and Country Planning Act 1990 in order for neighbourhood development plans to be found sound, namely:

- Housing requirement within the NDP is defined as a '*maximum*'. This is not in regard to nation planning policy or guidance.
- Housing requirement is not justified or in general conformity with the local development plan for the area.
- The NDP affords protection to land outside of settlement boundaries over and above that which is prescribed in both local and national planning policy. As such, this NDP fails to have regard to national policy and guidance and is not in general conformity with the local development plan for the area.
- NDP fails to set out a positive strategy for the conservation and preservation of the historic environment and heritage assets within Haughley. This is not in regard to national planning policy or guidance.
- The NDP also fails to recognise and positively consider the future of the most significant brownfield opportunity within the Plan area; the Haughley Park poultry factory, which results in a plan that does not contribute towards achieving sustainable development.

5.2 The NDP should be positively prepared and identify specifically the benefits associated with the redevelopment of the poultry factory site. It should provide a specific policy aimed at facilitating residential development of the brownfield land and supporting the associated heritage benefits that result. Policy HAU6 should be amended to delete reference to the previous commercial area of Haughley Park. The supporting text to the Plan should be amended as suggested to reflect the particular considerations associated with the former poultry factory and its potential to deliver significant planning gains.

5.3 It has also been demonstrated through this representation that the reuse of the existing factory site for employment purposes is not viable, due to the significant


redevelopment and remediation costs, coupled with the supply of other employment development on greenfield sites within the area.

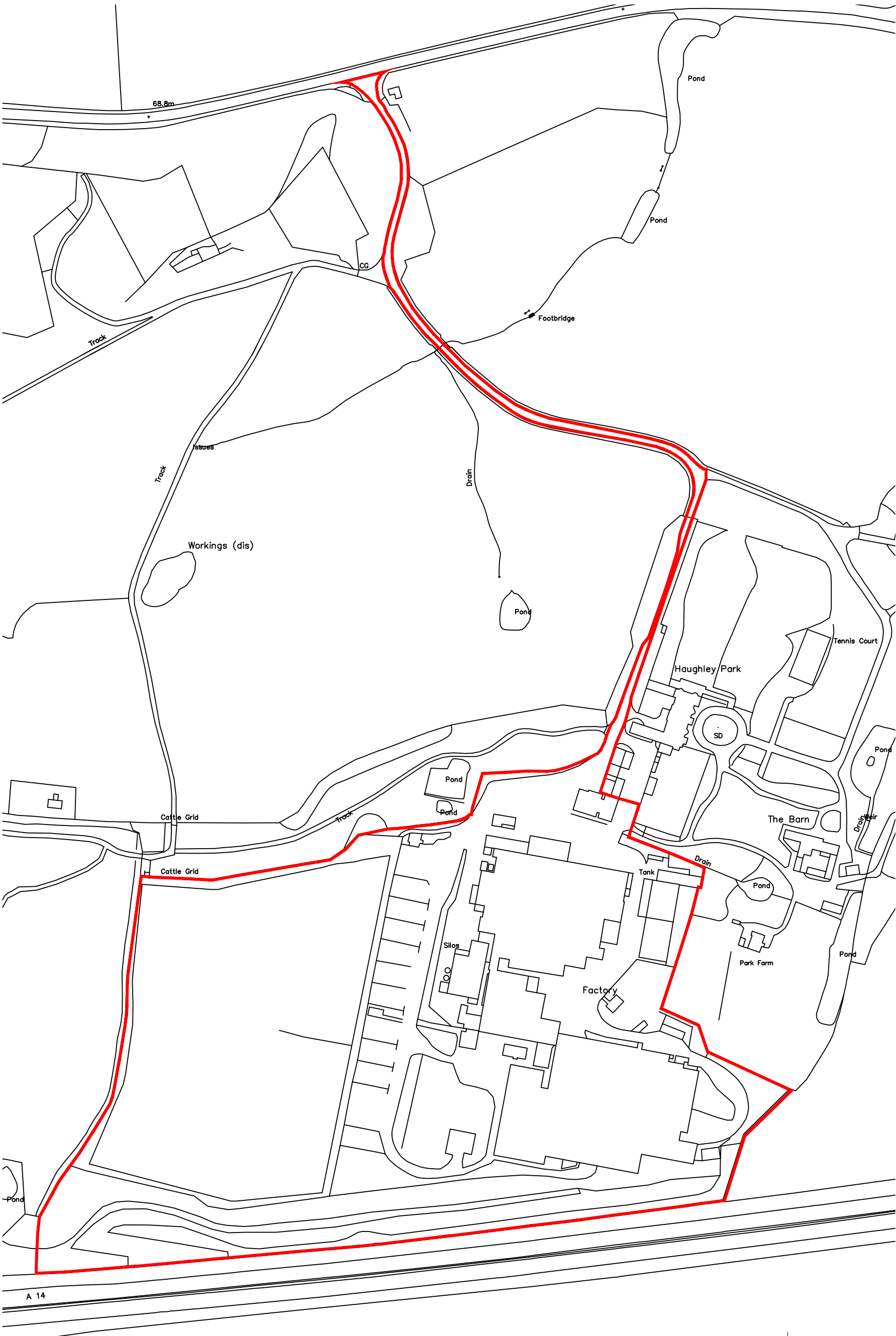
- 5.4 Pegasus Group on behalf of Amber REI Holdings Ltd welcome the opportunity to comment on the Neighbourhood Plan and trust that its representations will be considered accordingly.

APPENDIX 1

SITE LOCATION PLAN

KEY

 Site boundary



Rev	Description	Date	Drawn	Chk'd
B	Red line amendment	28.06.18	IW	RWB
A	Red line amendment	23.05.18	IW	RWB

HAUGHLEY PARK, STOWMARKET

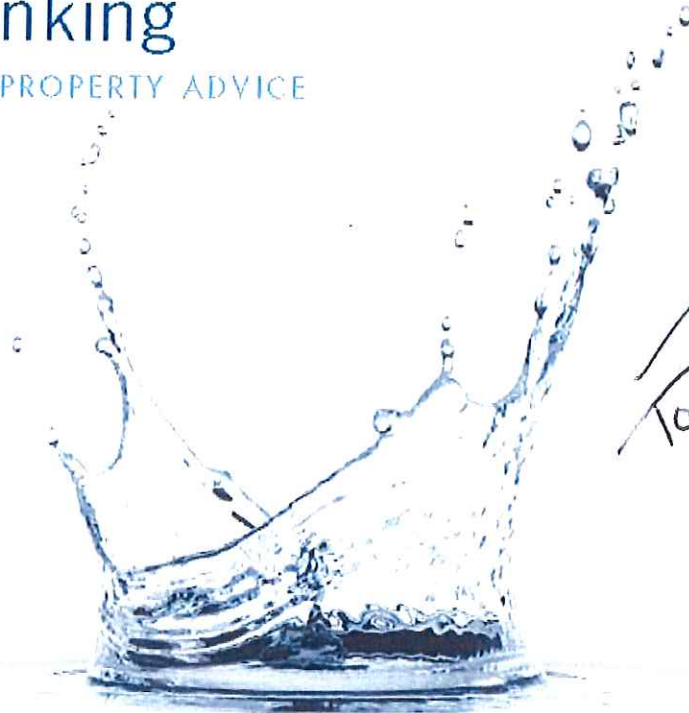
SITE LOCATION PLAN

APPENDIX 2

CONDITION APPRAISAL

REPORT

clearthinking
COMMERCIAL PROPERTY ADVICE



Condition Appraisal Report

Of Premises known as:
Former Haughley Park, Stowmarket, Suffolk, IP14 3JZ

On Behalf Of:
Amber Real Estate Investments

Prepared By:
Gareth Booker BSc (Hons)
Harris Lamb | Grosvenor House | 75-76 Francis Road | Edgbaston | Birmingham B16 8SP
Telephone: 0121 455 9455 Facsimile: 0121 455 6595 E-mail: gareth.booker@harrislamb.com

Job Ref: BC2728 Date: February 2016

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- 1.0 INTRODUCTION**
- 2.0 PROPERTY DESCRIPTION**
- 3.0 GENERAL BUILDING CONDITION**
- 4.0 STATUTORY MATTERS**
- 5.0 LEGAL CONSIDERATIONS**
- 6.0 RECOMMENDATIONS AND CONCLUSIONS**

APPENDICES

- I SITE PLAN**
- II BUDGET ESTIMATION**

1.0 INTRODUCTION

- 1.1 We have been instructed by Amber Real Estate Investments to prepare a Condition Appraisal Report of Former Haughley Park, Stowmarket, Suffolk, IP14 3JZ.
- 1.2 This report has been prepared with regard to Harris Lamb's Terms and Conditions. The survey and preparation of this report has been prepared by Gareth Booker BSc (Hons) for Harris Lamb Limited. The survey was undertaken during February 2016, at which time the weather was dry and overcast.
- 1.3 Our view of the external elevations was limited from those views afforded from ground level and access vantage points; as such we were limited to undertake a detailed inspection of the roof coverings.
- 1.4 Access to the buildings was available and the areas to the front of the site were inspected with the rear of the site still part of the operational business and not included in this report. The main access gate was also not inspected due to the current occupation and use. The first floor within the warehouse was also restricted for the inspection as the access points had been removed/damaged and we were advised on site not to access due to health and safety reasons. As these areas have not been inspected fully, assumptions have been made based on the overall condition of the buildings.
- 1.5 In accordance with your instructions we have not organised an environmental assessment of the premises or arranged for a mechanical and electrical consultant to provide advice on the services installations and therefore our comments are limited to a surveyor's visual inspection.
- 1.6 The majority of the internal areas of the building were accessible at the time of our inspection. Internal areas of the premises are fitted out for the purposes of the occupier's use of the premises however minimal areas were obscured from view.
- 1.7 This report should be seen as a summary report assessing the current condition of the premises. We would recommend that any future

purchaser/occupier of the premises should undertake all further investigations as necessary and also if contained within this report. Following this we anticipate that a further review of the premises will be required taking account of the specific requirements of the incoming occupier or purchaser.

- 1.8 For the purposes of this report the front elevation is deemed as the elevation when facing with your back to the main gate house entrance and all references to the right and left should be read that the reader is facing the front elevation.

2.0 PROPERTY DESCRIPTION

- 2.1 The site known as former Haughley Park, is located adjacent to a Grade one listed Jacobean house situated on the privately owned land of Haughley parks Estate. The site is located in Suffolk approximately 9 mile of Bury St Edmonds. Access to the site is provided directly off the A14.
- 2.2 Former Haughley Park comprises of various buildings that have been constructed for the purpose of food production and are generally inter-linked across the site. For the purposes of this report a site plan is included within the appendices of this report depicting the buildings.
- 2.3 The properties are of varying construction and have been grouped and summarised as noted below:

Office Area

- 2.4 The offices are located to the right hand side of the site. The building comprises of a two storey office area. The building is formed of load bearing masonry and beam and block concrete floors. Internal areas comprise of compartmented office space and welfare facilities within the two storey area forming the majority of the areas.

Main Warehouse Building

- 2.5 Elevations to the buildings are a combination of finishes formed of stretcher bond facing brickwork with factory coated corrugated panels. The roof

generally comprises of an inverted pitched frame covered with assumed mineral felt coverings and no roof lights present.

- 2.6 The warehouse building; ground floor internally comprises open and cellular working spaces; coated floor finishes of concrete floor slabs and a combination of compartmented partitioned areas which have been fitted with cold store cladding panels to both the walls and ceilings. Additionally, to the warehouse there are additional first demise floor which appears to be used as office space, plant areas and changing facilities within the warehouse areas. From ground floor inspections we have made the following assumptions; the area consists of floor finished in isolated areas, paint finished walls and a suspended ceiling finish to isolated sections.
- 2.7 The rear elevation comprises of dock levelling platforms for loading and unloading of goods and processing areas.

3.0 GENERAL BUILDING CONDITION

- 3.1 We found no evidence to suggest that the structure or foundations to the premises were defective for the purposes of the buildings.
- 3.2 With the exception of minor cracking and localised concrete slab/ disrepair we found no evidence to suggest the structure or foundations of the building were in disrepair. In addition, we noted a number of impact damaged/vandalised areas of brick and block work, again we do not suggest that the structure or foundations to the premises were in any way defective and would see reinstatement of these areas to be acceptable.

Roof and Rainwater Goods

- 3.3 There were a number of stains to the ceiling within all buildings, indicating that the roof covering is leaking in areas. Our inspection of the roof covering was limited to the vantage points afforded at the site; therefore, we cannot confirm the extent of the leaking. We anticipate that the condition of the roof covering would need remedial works and any future occupier should

undertake a full roof inspection in order that appropriate repair works could be assessed.

- 3.4 Areas of the rainwater goods which we were able to view are in poor condition suffering from leaks to multiple joints. We anticipate that the remainder of the rainwater goods are in an equally poor condition and anticipate that the replacement/repair of the majority of the existing gutters and rainwater down pipes will be required. We further noted numerous soiling present especially around the outlet heads of the storm water pipes to the inverted roof details.

Elevations

- 3.5 All glazing panels to the windows along the external elevations are soiled with isolated impact damage. We anticipate that the replacement of the damaged glazing panels would need to be undertaken by any future occupier of the premises.
- 3.6 The decorations to external elements including joinery and timber fascia panels are in poor condition. This not only detracts from the aesthetical appearance of the premises but will also leave the timber elements susceptible to water damage and progressive rot. We anticipate that the redecoration of these elements would need to be undertaken by any future occupier of the premises.
- 3.7 The windows to the premises are generally in poor condition with a number of defects being noted including, opening mechanisms having worn/failed, areas of de-bonded / perished seals along the junction of the frames and remainder of the elevations. We would anticipate that the complete overhaul/replacement of the existing window units to the premises will need to be undertaken by any future occupier of the premises.

Internal Areas

- 3.8 Internal areas of the premises have been extensively fitted out to suit the occupiers' operations. We anticipate that the excessive refurbishment of the areas would be required by any future occupier of the premises.

- 3.9 Doors and door furniture within the premises are suffering from considerable vandalism, wear and tear and are generally dated. We anticipate that any future occupier of the premises will need to replace, overhaul the existing door units.
- 3.10 Internal decorations are worn and vandalised. We anticipate that the redecoration and remedial repairs of the internal elements would be required throughout the areas by any future occupier of the premises.

Services

- 3.11 Generally the electrical supply to the premises appeared non-functional. We were unable to view current test certificates for the installations and anticipate that these would be required by any future occupier of the premises.
- 3.12 We were unable to confirm whether the water supply within the premises complies with modern requirements. We anticipate that confirmation that the water supply comprises of modern requirements would be required by any future occupier of the premises.
- 3.13 We were unable to view the below ground drainage to the premises; however, gulley channel drainage within the site area of the property was generally soiled. We would anticipate any future occupier would require remedial works to be undertaken prior to a CCTV drainage survey of the below ground drainage system to confirm its current condition and full operation.
- 3.14 The mechanical systems provided within the premises are non-functional/removed and vandalised. We anticipate that the replacement/overhaul of the mechanical system will be required by any future occupier of the premises.
- 3.15 The electrical installations within the premises are not operational/removed and vandalised. We anticipate that the overhaul/replacement of the electrical installations be required by any future occupier of the premises.

- 3.16 Extensive redundant mechanical and electrical installations remain within the premises. We anticipate that the removal of these will be required by any future occupier of the premises.

External Areas and Boundaries

- 3.17 Hardstanding to the front and rear elevations of the office block are generally overgrown with numerous self-setting weed growths.
- 3.18 Soft/hard landscape area of the demised area are generally overgrown with waste deposits noted that require removal.

4.0 STATUTORY MATTERS

Fire Precautions and Means of Escape

- 4.1 The current fire safety regulations specifically the regulatory reform (fire safety) 2005 imposes various obligations on both owner and occupiers of properties to assess, manage and reduce the risk of fire together with providing adequate means of escape. We have not undertaken a fire risk assessment and in the event that the premises are sold we anticipate that a review and adaptation of the existing fire safety measures will be required.
- 4.2 We noted the fire alarm and emergency lighting throughout the office/warehouse was vandalised/non-functional and would require replacement by future occupiers of the property.

Deleterious Materials

- 4.3 We recommend that if a current copy of the asbestos register for the premises is not available; we recommend that an asbestos survey is commissioned prior to the proposed works of the premises.
- 4.4 Whilst we did note textured coatings in the structure. Or the use of any other material which may be considered deleterious the building is of an age and type where such construction materials which are classed as deleterious may

be present in some form. These materials will only be able to be identified via obtrusive investigations with the exception of the services which have been dealt with previously within the report we do not anticipate they will affect your proposed use of the premises.

Disabled Access and Facility

- 4.5 We have not undertaken a full disability discrimination audit of the premises and in the event of acquiring the premises we would recommend that further assessment of this requirement is made in order to ensure that suitable measures have been taken in respect of accessibility to the premises.

Health and Safety

- 4.6 Various legislation including Workplace Health and Safety Welfare Regulation 1992 and the Health and Safety at Work Act 1974 places responsibilities on employers and building owners to ensure workplaces under their control comply with provisions within these acts and regulations. We would assume the owner/occupier would be aware of such legislation and would undertake the required steps to satisfy such regulations.

Energy Performance Certificate

- 4.7 There is an obligation upon the vendor to provide an EPC (Energy Performance Certificate) for the premises as part of the sale documents. This will identify the energy performance rating for the premises on an alphabetical scale and identify recommendations and potential improvements that need to be undertaken. In the event of undertaking repair / refurbishment works it may be necessary to comply with improvement standards for energy performance and building regulation requirements. An EPC will also be necessary in the event of re-letting the premises.

5.0 LEGAL CONSIDERATIONS

- 5.1 There are a number of legal issues which we anticipate will be reviewed by any future purchaser/occupier of the premises. In summary these include:

- The full title of the property and the full extent of the site will need to be established.
- Any wayleaves and easements, including those pertaining to the utility/services owned will need to be established.
- Any outstanding conditions relating to statutory consents pertaining to the premises will need to be identified.
- Site contamination that may be present from past site use.

6.0 RECOMMENDATIONS AND CONCLUSIONS

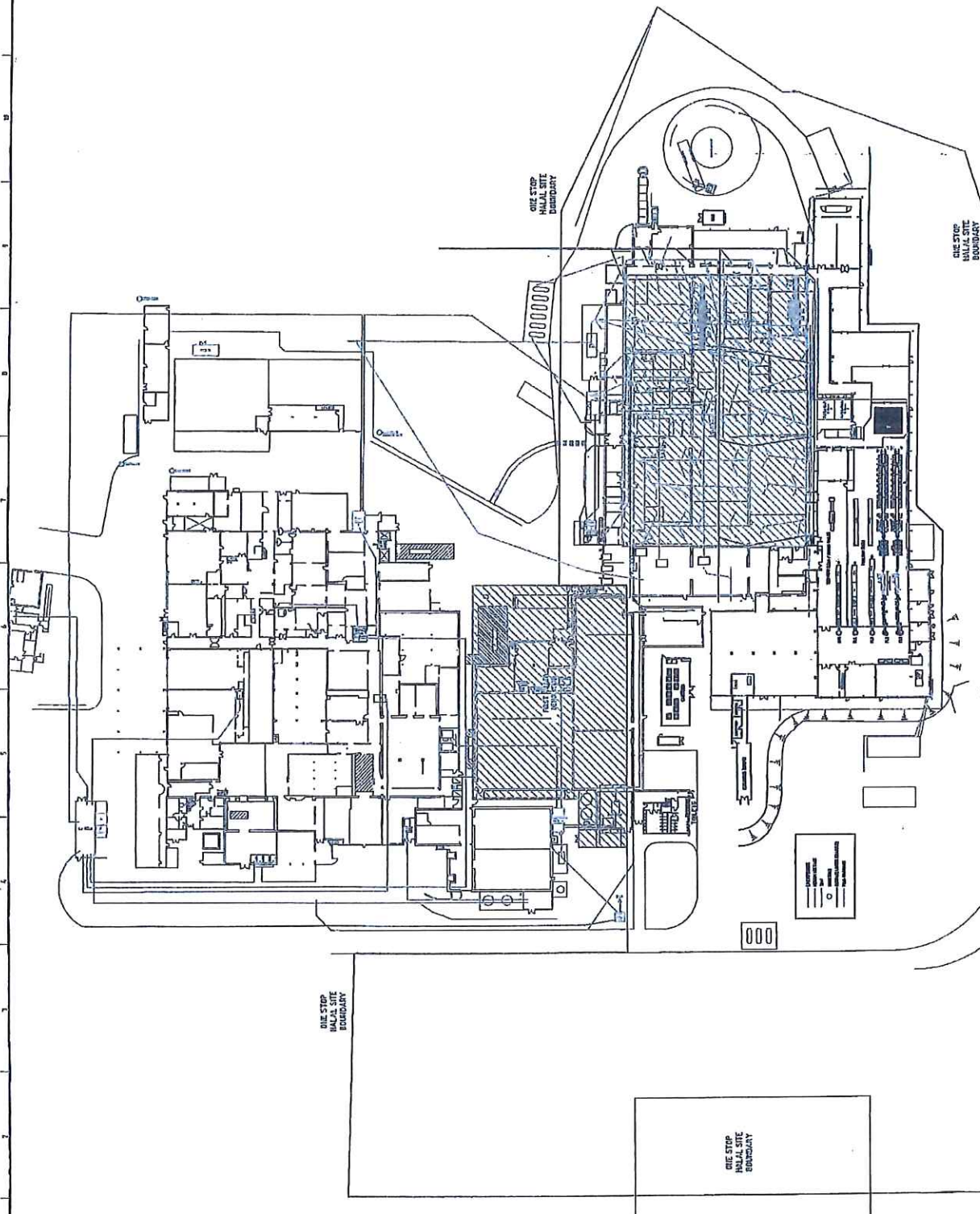
- 6.1 The premises have been unoccupied for some time and will require extensive repairs to the external and, internal finishes/service installations before they are fit for future occupation and operational use.
- 6.2 The properties have been extensively damaged/vandalised with significant reinstatement required to the properties to put into a tenatable state of repair.
- 6.3 Budget costs relating to the required works identified within this report contained with the appendices. These should be read for guidance purposes only and are subject to the confirmation of an agreed scope of works, completion of a detailed specification and competitive tendering process.

APPENDIX 1

SITE PLAN


 2 SISTERS
 2 Sisters Food Group Ltd
 Haughley Park
 Stowmarket
 Suffolk
 IP14 3JZ

SCALE	NO SCALE	TITLE	ONE STOP HALAL EXISTING SITE SERVICES
DATE		DRAWING NUMBER	OSH003
DRAWN	AMGH/P.TEL	PROJECT	HAUGHLEY PARK
CHECK		REV	A
APPR.		REV	OF
		NO	OF
		SIZE	A1
		SHEET	1
		OF	1



- EXISTING WALLS
- EXISTING DOORS
- EXISTING WINDOWS
- EXISTING ROOF
- EXISTING FLOORS

UNLESS OTHERWISE SPECIFIED—DIMENSIONS IN MM

APPENDIX 2

BUDGET ESTIMATION

Former 2 Sisters Food Group Premises, Haughley Park, Stowmarket, Suffolk, IP14 3JZ

Item	Description	Quantity	Rate	£ - p	
INTERNALS					
1.00	Stores and water Supply Room				
1.01	soiled lining panels and frame to ceiling allow for cleaning all finishes	80	£ 5.00	£	400.00
1.02	Clean and replace none functional light fittings	16	£ 35.00	£	560.00
1.03	Test fixed wiring to electrical cables , fire alarm and sounders	1	£ 500.00	£	500.00
1.04	Prepare and decorated blocked paint walls	216	£ 9.00	£	1,944.00
1.05	Impact damaged panel wall replace damaged sections	12	£ 100.00	£	1,200.00
1.06	Overhaul existing roller shutter door and leave in operational order	1	£ 600.00	£	600.00
1.07	Soiled concrete floor finishes . Allow for cleaning associated concrete floor finishes.	80	£ 5.00	£	400.00
1.08	Clean and chorinate water supply pipe work currently no in use ready for opertalon	1	£ 5,000.00	£	5,000.00
1.09	Paint floor screed to previuosly painted areas and make good to delaminated areas	40	£ 10.00	£	400.00
2.00	Engineering				
2.01	Prepare and decorate previously painted plaster ceiling.	39	£ 9.00	£	351.00
2.02	Prepare and decorate previously painted walls.	55	£ 9.00	£	495.00
2.03	Clean soiled floor finishes throughout.	39	£ 5.00	£	195.00
2.04	Realign misaligned door and timber partition to sliding door of engineering area.	1	£ 150.00	£	150.00
2.05	Test electrics and associated mechanical and leave in working order.	1	£ 2,487.00	£	2,487.00
2.06	Soiled and impact damaged low level partition finishes between engineering garage and engineer workshop. (Size of area	20	£ 28.00	£	560.00
2.07	Previously painted timber panelling to inverted roof generally soiled and requires decoration.	240	£ 9.00	£	2,160.00
2.08	Impact damaged partitions to sub-dividing walls in engineering area.	1	£ 480.00	£	480.00

2.09	Damaged insulation to associated mechanical supply pipes. Allow for making good damaged insulation.	3	£	25.00	£	75.00
2.10	Impact damaged fire door to engineering bay. Allow for replacing door and decoration of frame.	1	£	543.00	£	543.00
2.11	Impact damaged finishes to sectional doors. Replace impact damaged sections to engineering bay roller shutter door.	1	£	900.00	£	900.00
2.12	Ease and adjust 2 No. roller shutter doors and leave in working order.	2	£	600.00	£	1,200.00
2.13	Soiled concrete floor finishes in engineering bay. Allow for cleaning associated concrete floor finishes.	240	£	5.00	£	1,200.00
2.14	Redundant light fittings within engineering bay. Allow for replacing and making sure electrics in full working order.	1	£	1,270.00	£	1,240.00
2.15	Soiled glazing to light fittings in engineering bay. Allow for cleaning associated internal glazing and frames.	2	£	7.00	£	14.00
2.16	Soiled and marked decorated internal doors in engineering bay. Allow for decoration of doors.	2	£	150.00	£	300.00
3.00	First Floor Engineering Office					
3.01	Previously painted timber panels to lining of roof require decoration to office area.	39	£	9.00	£	351.00
3.02	Prepare and decorate previously painted walls.	84	£	9.00	£	757.00
3.03	Painted internal windows and doors require decoration to office area.	5	£	408.00	£	408.00
3.04	Painted skirtings and door frames require decoration. Allow for decoration.	44	£	9.00	£	396.00
3.05	Impact damaged plaster finishes to wall. Allow for replacing impact damaged finishes.	1	£	73.00	£	73.00
3.06	Soiled and trafficked vinyl floor finishes. Allow for cleaning vinyl floor coverings.	39	£	7.00	£	273.00
3.07	Soiled light diffusers and none functional lights. Overhaul lighting	1	£	1,200.00	£	1,200.00
3.08	Perform electrical inspection and test of fixed wiring and perform remedial repairs to give satisfactory certification	1	£	850.00	£	850.00
3.09	Test smoke and fire alarm system and replace missing smoke head	1	£	650.00	£	650.00

4.00	First Floor Engineering Changing Area					
4.01	Previously painted timber panels to lining of roof require decoration to area.	24	£	9.00	£	216.00
4.02	Prepare and decorate previously painted walls.	44	£	9.00	£	396.00
4.03	Painted internal doors require decoration to area and replacing of door furniture were necessary .	2	£	200.00	£	400.00
4.04	Painted door frames require decoration. Allow for decoration.	20	£	9.00	£	180.00
4.05	Impact damaged plaster finishes to wall. Allow for replacing impact damaged finishes.	1	£	73.00	£	73.00
4.06	Soiled and trafficked vinyl floor finishes. Allow for replacing vinyl floor coverings.	24	£	35.00	£	840.00
4.07	Soiled light diffusers and none functional lights . Overhaul lighting	1	£	450.00	£	450.00
4.08	Perform electrical inspection and test of fixed wiring and perform remedial repairs to give satisfactory certification	1	£	850.00	£	850.00
4.09	Test smoke and fire alarm system and replace missing smoke head	1	£	650.00	£	650.00
	replace electric shower to cubicle	1	£	300.00	£	300.00
4.10	Clean shower unit, align upstands and leave drainage free flowing	1	£	130.00	£	130.00
5.00	Engineering Meeting Room					
5.01	Previously painted timber panels to roof detail are not decorated.	12	£	9.00	£	108.00
5.02	Impact damaged plaster walls.	2	£	73.00	£	146.00
5.03	Previously painted walls. Allow for decoration.	31	£	9.00	£	279.00
5.04	Soiled and trafficked floor finishes to meeting room.	31	£	21.00	£	651.00
5.05	Previously painted joinery to door frames and doors. Allow for decoration.	20	£	9.00	£	180.00
5.06	Smoke and fire alarm system not operational test, repair and commission.	1	£	650.00	£	650.00
6.00	Engineering First Floor Stores					
6.01	Wallpaper coverings to walls generally soiled to stores area.	40	£	9.00	£	360.00
6.02	Previously painted timber ceilings to engineer stores not decorated.	23	£	9.00	£	207.00
6.03	Impact damaged wall finishes in engineer stores.	1	£	73.00	£	73.00
6.04	Soiled vinyl floor finishes. Allow for replacement	23	£	35.00	£	805.00

6.05	Smoke and fire alarm system not operational test, repair and commission.	1	£	650.00	£	650.00
7.00	Ingredients Stores					
7.01	Soiled food processing panels with noted impact damage present throughout.	458	£	100.00	£	45,800.00
7.02	Soiled food processing panels to ceiling deep clean and leave ready for operation	864	£	8.00	£	6,912.00
7.03	floor finishes soiled and damaged replace floor coverings	864	£	45.00	£	38,880.00
7.04	Soiled PVC flap curtains and associated doors	1	£	150.00	£	150.00
7.05	Light fittings not in operation. Water evident in isolated diffusers. Replace fittings	1	£	21,600.00	£	21,600.00
7.06	Drainage channels generally soiled with missing covers present.	1	£	5,795.00	£	5,795.00
7.07	Damaged internal doors replace	1	£	750.00	£	750.00
7.08	Decorate previously painted brick work and joinery	1	£	450.00	£	450.00
7.09	Soiled food processing panels with noted impact damage present to additional cellular areas .	160	£	100.00	£	16,000.00
7.10	Floor finishes soiled and damaged to additional cellular areas replace floor coverings	400	£	45.00	£	18,000.00
7.11	Lights not operational in additional cellular areas	1	£	2,500.00	£	2,500.00
7.12	Smoke and fire alarm system not operational test, repair and commission.	1	£	650.00	£	650.00
8.00	Killzone					
8.00	Soiled food processing panels to ceiling deep clean and leave ready for operation	736	£	8.00	£	5,888.00
8.01	Soiled food processing panels with noted impact damage present throughout.	253	£	100.00	£	25,300.00
8.02	Floor finishes soiled and damaged replace floor coverings	736	£	45.00	£	33,120.00
8.03	Soiled associated doors with impacted damage	1	£	750.00	£	750.00
8.04	Light fittings not in operation. Water evident in isolated diffusers. Replace fittings	1	£	18,400.00	£	18,400.00
8.05	Drainage channels generally soiled deep clean drainage ready for operational use	1	£	5,795.00	£	5,795.00

8.06	Ceiling mounted extraction and fabric filtration generally soiled and not operational for use	1	£	7,500.00	£	7,500.00
8.07	Smoke and fire alarm system not operational test, repair and commission.	1	£	650.00	£	650.00
8.08	Decorate previously painted brick work and joinery	1	£	850.00	£	850.00
9.00	Live Birds Load / AMC Areas					
9.01	Soiled food processing panels to ceiling deep clean and leave ready for operation	735	£	8.00	£	5,880.00
9.02	Soiled food processing panels with noted impact damage present throughout.	158	£	100.00	£	15,800.00
9.03	Floor finishes soiled and damaged replace floor coverings	735	£	45.00	£	33,075.00
9.04	Soiled associated doors with impact damage	1	£	750.00	£	750.00
9.05	Light fittings not in operation. Replace fittings and wires	1	£	18,375.00	£	18,375.00
9.06	Drainage channels generally soiled deep clean drainage ready for operational use	1	£	5,795.00	£	5,795.00
9.07	Decorate previously painted joinery	1	£	1,550.00	£	1,550.00
9.08	Smoke and fire alarm system not operational test, repair and commission.	1	£	650.00	£	650.00
9.09	Decorate previously painted brick work and joinery	1	£	850.00	£	850.00
10.00	Canteen Area					
10.01	Repair and decorate internal wall to canteen areas	140	£	10.00	£	1,400.00
10.02	Repairs /decorations to windows and doors	1	£	850.00	£	850.00
10.03	Replace damaged ceiling tiles and deep clean	126	£	7.00	£	882.00
10.04	Replace damaged perimeter heating system	1	£	4,000.00	£	4,000.00
10.05	Replace damaged plaster ceilings to catering area	1	£	350.00	£	350.00
10.06	Floor finishes soiled and damaged replace floor coverings	126	£	45.00	£	5,670.00
10.07	Smoke and fire alarm system not operational test, repair and commission.	1	£	650.00	£	650.00
10.08	Light fittings not in operation. . Test and repair/replace fittings as required	1	£	3,150.00	£	3,150.00

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10.09	Mechanical extraction and air conditioning not operational. Perform remedial repairs to associated systems and leave in working order	1	£	3,500.00	£	3,500.00
10.10	Replace damaged /missing worktops, base units and sink/ appliances to food preparation areas	1	£	9,500.00	£	9,500.00
10.11	deep clean, chorinate water supplies and drainage to canteen are and leaving in operational condition	1	£	1,500.00	£	1,500.00
10.12	Repair , test and certificate electrical supplies and fittings in canteen areas	1	£	3,500.00	£	3,500.00
10.13	make good damaged floor screed and replace reinforcement	1	£	250.00	£	250.00
11.00	Ready Meals					
11.01	Soiled food processing panels to ceiling deep clean and leave ready for operation	864	£	8.00	£	6,912.00
11.02	Soiled food processing panels with noted impact damage present throughout.	346	£	100.00	£	34,600.00
11.03	floor finishes soiled and damaged replace floor coverings	864	£	45.00	£	38,880.00
11.04	Soiled/damaged associated doors deep clean doors	1	£	750.00	£	750.00
11.05	Light fittings not in operation. Water evident in isolated diffusers. Replace fittings	1	£	21,600.00	£	21,600.00
11.06	Drainage channels generally soiled with missing covers present.	1	£	5,795.00	£	5,795.00
11.07	Damaged internal doors replace	1	£	750.00	£	750.00
11.08	Decorate previously painted brick work and joinery	1	£	450.00	£	450.00
11.09	Soiled food processing panels with noted impact damage present to additional cellular areas .	160	£	100.00	£	16,000.00
11.10	Floor finishes soiled and damaged to additional cellular areas replace floor coverings	400	£	45.00	£	18,000.00
11.11	Lights not operational in additional cellular areas	1	£	10,000.00	£	10,000.00
11.12	Smoke and fire alarm system not operational test, repair and commission.	1	£	650.00	£	650.00
12.00	Meat Processing					
12.01	Soiled food processing panels to ceiling deep clean and leave ready for operation	871	£	8.00	£	6,968.00

12.02	Reinstate cold store panels to ceiling area with missing panels	300	£	100.00	£	30,000.00
12.03	Soiled food processing panels with noted impact damage and minor corrosion present throughout.	225	£	100.00	£	22,500.00
12.04	Floor finishes soiled and damaged replace floor coverings	871	£	45.00	£	39,195.00
12.05	Soiled/damaged associated doors deep clean doors and replace cold store doors	1	£	1,500.00	£	1,500.00
12.06	Light fittings not in operation. Water evident in isolated diffusers. Replace fittings and replace wiring and leave in working order	1	£	27,875.00	£	27,875.00
12.07	Drainage channels generally soiled with missing covers present.	1	£	5,795.00	£	5,795.00
12.08	Damaged concrete floor slab. Break out and repair concrete section including reinforcement and dowels to existing slab	1	£	3,000.00	£	3,000.00
12.09	Soiled/damaged associated doors deep clean doors and replace cold store doors	1	£	1,500.00	£	1,500.00
12.10	Decorate previously painted finishes including brick work and joinery	1	£	2,800.00	£	2,800.00
12.11	Smoke and fire alarm system not operational test, repair and commission.	1	£	650.00	£	650.00
13.00	Kiev/Ing					
13.01	Soiled food processing panels to ceiling deep clean and leave ready for operation	1215	£	8.00	£	9,720.00
13.02	Soiled food processing panels with noted impact damage and minor corrosion present	279	£	100.00	£	27,900.00
13.03	Floor finishes soiled and damaged replace floor coverings	1215	£	45.00	£	54,675.00
13.04	Soiled/damaged associated doors deep clean doors	1	£	750.00	£	750.00
13.05	Light fittings not in operation. Water evident in isolated diffusers. Replace fittings and replace wiring and leave in working order	1	£	30,375.00	£	30,375.00
13.06	Drainage channels generally soiled allow for cleaning and leaving in working order for operational use	1	£	5,795.00	£	5,795.00
13.07	Soiled/damaged associated doors deep clean doors and replace cold store doors	1	£	1,500.00	£	1,500.00
13.08	Decorate previously painted finishes including brick work and joinery	1	£	3,500.00	£	3,500.00

13.09	Smoke and fire alarm system not operational test, repair and commission.	1	£	650.00	£	650.00
14.00	Ground floor Circulation Area					
14.01	Ceiling finishes no decorated and damaged through allow to repair and decorate as required	300	£	15.00	£	4,500.00
14.02	Soiled food processing panels with noted impact damage and minor corrosion present	120	£	100.00	£	12,000.00
14.03	Floor finishes soiled and damaged deep clean and perform concrete repairs required	300	£	15.00	£	4,500.00
14.04	Soiled/damaged associated doors deep clean doors and decorate /replace as required	1	£	3,500.00	£	3,500.00
14.05	Light fittings not in operation. Water evident in isolated diffusers. Replace fittings and replace wiring and leave in working order	1	£	7,500.00	£	7,500.00
14.06	Decorate previously painted finishes including brick work and joinery	1	£	3,500.00	£	3,500.00
14.07	Smoke and fire alarm system not operational test, repair and commission.	1	£	650.00	£	650.00
15.00	First Floor Warehouse Areas					
15.01	Ceiling finishes no decorated and damaged through allow to repair and decorate as required	842	£	15.00	£	12,631.00
15.02	wall finishes no decorated and damaged through allow to repair and decorate as required	210	£	7.00	£	1,473.00
15.03	Floor finishes soiled and damaged deep clean and perform repairs required	842	£	25.00	£	21,050.00
15.04	Soiled/damaged associated doors deep clean doors and decorate /replace as required	1	£	3,500.00	£	3,500.00
15.05	Light fittings not in operation. Water evident in isolated diffusers. Replace fittings and replace wiring and leave in working order	1	£	21,050.00	£	21,050.00
15.06	Smoke and fire alarm system not operational test, repair and commission.	1	£	650.00	£	650.00
16.00	Mechanical and Electrical					

16.01	Missing , damaged and corroded duct work for mechanical installations in food preparation areas. Allow for remedial repairs and cleaning of ducts ready for operational use	1	£	200,000.00	£	200,000.00
16.02	Non operational plant for food preparation areas. Perform remedial repairs to system and leave in working order	1	£	150,000.00	£	150,000.00
16.03	test and commission all fixed wiring including sockets, distribution boards and perform remedial repairs to provide satisfactory electrical installation certificates	1	£	150,000.00	£	150,000.00

EXTERNALS

17.00 Roof

17.01	Clean out all gutters and internal down pipes perform remedial repairs to water ingress of associated roofs areas including sealing around perished surface penetrations, replacing flues and treating corrosion to metal flues	3563	£	75.00	£	267,225.00
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18.00 First Elevation When Entering The Site

18.01	Heavily soiled brickwork identified. Allow for cleaning down of soiled brickwork with moss and algae growth to the walls.	105	£	735.00	£	735.00
18.02	Heavily soiled UPVC pipework and rainwater goods identified to the brickwork. Allow for cleaning down of heavily soiled pipework.	25	£	100.00	£	100.00
18.03	Moss and vegetation growth to the full length of the brickwork wall section. Allow for removal.	30	£	120.00	£	120.00
18.04	Allow for cleaning down and removal of vegetation to guttering.	30	£	120.00	£	120.00
18.05	Allow for remedial repair work to 2 No. gutter sections. Allow for replacing section of gutter which has become damaged.	1	£	150.00	£	150.00

19.00 Short Reveal of Brickwork

19.01	Cleaning down of heavily soiled brickwork.	28	£	196.00	£	196.00
19.02	Clean down heavily soiled fascia board.	1	£	250.00	£	250.00

19.03	Allow for repairing remedial work to vent unit as there was evidence of impact damage.	1	£	80.00	£	80.00
20.00	Rear Elevation Beneath Canopy					
20.01	Heavily soiled brickwork identified with areas of efflorescence. Allow for cleaning and allow for 35 sq m of cleaning down of brickwork.	35	£	4.50	£	157.50
20.02	Allow for repairing to damaged and blown brickwork faces identified. Allow for replacing and repairing brickwork. Allow for 6 sq m.	6	£	25.00	£	150.00
20.03	Corrosion identified to the steelwork around the door frame. Allow for cleaning down and decorating previously decorated steelwork.	10	£	35.00	£	350.00
20.04	Allow for cleaning down of soiled entrance door.	6.6	£	4.50	£	29.70
20.05	Allow for cleaning down of soiled cladding and louvre grills.	50	£	4.50	£	225.00
20.06	Rotting timber fascia and soffit boards identified. Allow for replacing.	30	£	40.00	£	1,200.00
20.07	Impact damage to 2 No. doors. Allow for providing remedial repair work and ease and adjusting doors back into place.	2	£	103.70	£	207.40
20.08	Impact damage to profile cladding to the underside of the canopy. Allow for replacing the impact damaged cladding,	6	£	80.00	£	480.00
20.09	Allow for replacing trim to impact damaged cladding.	1.8	£	35.00	£	63.00
20.10	Allow for replacing reveal to impact damage cladding which has become damaged.	3	£	35.00	£	105.00
20.11	Heavily soiled and solar degraded cladding. Allow for cleaning down.	14	£	4.50	£	63.00
20.12	Allow for cleaning down of 2 No. roller shutter doors which have become soiled.	26	£	4.50	£	117.00
21.00	Canopy				£	-
21.01	Allow for cleaning down of heavily soiled lights.	6	£	7.00	£	42.00
21.02	Corrosion identified to the impact bollards fixings. Allow for replacing fixings which have become corroded or are loose.	48	£	3.50	£	168.00

21.03	Allow for repairing remedial work to impact damaged barrier to the steelworks.	5	£	78.78	£	393.90
21.04	Allow for cleaning down of soiled guttering to the canopy.	30	£	7.94	£	238.20
21.05	Allow for cleaning down of soiled UPVC cladding to the canopy area.	15	£	4.50	£	67.50
21.06	Allow for cleaning down of rainwater downpipe.	6	£	4.50	£	27.00
22.00	Rear Elevation (Not Under Canopy)					
22.01	Allow for replacing of rotten window cill.	1	£	75.00	£	75.00
22.02	Allow for cleaning down of UPVC soiled windows and window cills.	2	£	5.00	£	10.00
22.03	Allow for cleaning down of heavily soiled UPVC double entrance door.	1	£	16.00	£	16.00
22.04	Perform splice repair work to damaged timber window frame work and cills and allow for decorating.	9	£	75.00	£	675.00
22.05	Allow for cleaning down of profile cladding section.	40	£	4.50	£	180.00
22.06	Allow for cleaning down and decorating external lining panel which has become heavily soiled.	7	£	9.00	£	63.00
22.07	Allow for replacing damaged door to fire escape stairwell.	1	£	350.00	£	350.00
22.08	Air conditioning extractor vent unit noted to the rear elevation.	1	£	5,000.00	£	5,000.00
22.09	Alarm system noted to elevation.	1	£	50.00	£	50.00
22.10	Allow for removal of vegetation to the perimeter wall.	1	£	32.00	£	32.00
22.11	started to degrade and flake. Allow for removal of friable material, carrying out splice repair work to damaged areas and redecorating 30 lm.	30	£	49.00	£	1,470.00
22.12	Corrosion identified to the framework around the roller shutter door. Allow for cleaning down and removal of friable material, corrosion and redecorating.	12	£	9.00	£	108.00
22.13	Corrosion identified to the roller shutter door. Allow for removal and redecorating.	1	£	65.00	£	65.00
22.14	Allow for decorating reveal to the roller shutter door.	1	£	47.00	£	47.00
22.15	Allow to perform remedial repair works to the crack identified to the right hand side of the roller shutter door.	1	£	25.00	£	25.00

22.16	Allow for replacing sealant strip to roller shutter door.	1	£	45.00	£	45.00
22.17	escape staircase. Allow for treating areas around the joints.	27	£	35.00	£	945.00
22.18	Allow for splice remedial repair work to the wooden fronted section.	1	£	225.00	£	225.00
22.19	Allow for removal of friable material and decorating.	9	£	9.00	£	81.00
22.20	Allow for replacing of rotten threshold.	3	£	75.00	£	225.00
22.21						
	Corrosion identified to pipework leading into the unit. Allow for removal of corrosive material and preparing remedial repair work.	3	£	9.00	£	27.00
22.22						
	Damage to the finish of the concrete frame identified. Allow for removal of material and redecorating. Include remedial repair work to cracking identified.	2	£	59.00	£	118.00
23.00	Mechanical Water Store					
23.01	Heavily degraded and rotten wooden entrance façade. Allow for removal and replacement.	1	£	500.00	£	500.00
23.02						
	Heavily soiled damp and rotten fascia board identified.	6	£	40.00	£	240.00
23.03	Leaking roof identified. Allow for further investigation required and carrying out remedial works to the affected area as the leak is dripping onto cabling which runs the front of the fascia. The leak is associated with there being no rainwater goods such as guttering to the sloped roof section as shown in photo.	1	£	164.00	£	164.00
23.04						
	Allow for cleaning down of the timber grill to the brickwork above the fuel / water store.	1	£	518.00	£	518.00
23.05	Allow for the removal of friable material and decorating.	12	£	9.00	£	108.00
23.06	Allow for decorating pipework which has become corrosive.	12	£	9.00	£	108.00
24.00	Left Hand Side Elevation - Area Below Water Store					

24.01	Allow for replacing the timber entrance door.	1	£	177.00	£	177.00
24.02	Allow for cleaning down of the soiled profile cladding.	10	£	4.50	£	45.00
24.03	Allow for replacing impact damaged cladding.	3	£	80.00	£	240.00
24.04	Allow for replacing missing fixings to the cladding section.	10	£	3.50	£	35.00
24.05	Allow for ease and adjusting entrance door so that it now works sufficiently.	1	£	103.70	£	103.70
24.06	Allow for cleaning down of the metal profile roof which has become soiled.	18	£	4.50	£	81.00
24.07	Allow for cleaning down of painted steelwork protection.	9	£	9.00	£	81.00
24.08	Allow for removal of friable material and decorating.	3	£	9.00	£	27.00
24.09	Allow for replacing overflow pipe to the brickwork to the right hand side of the corrugated store. The affected area has heavily soiled and stains to the brickwork.					
	Allow for reinserting of rainwater pipework.	2	£	21.00	£	42.00
24.10	Allow for cleaning down of heavily soiled and damp brickwork.	2	£	4.50	£	9.00
24.11	Allow for decorating the previously decorated timber section of the engineer's access area.	10	£	9.00	£	90.00
24.12	Allow for replacing the damaged door and framework.	1	£	260.00	£	260.00
24.13	Allow for cleaning down of soiled compressed gas box.	5	£	4.50	£	22.50
24.14	friable material to the impact barriers around the entrance door and decorating.	9.5	£	13.50	£	128.25
24.15	Allow for cleaning down of heavily soiled and solar degraded profile cladding.	84	£	4.50	£	378.00
24.16	Allow for replacing impact damaged cladding.	4	£	80.00	£	320.00
24.17	Allow for replacing missing fixing.	6	£	3.50	£	21.00
24.18	Allow for cleaning down of fast action door which has become heavily soiled.	5.6	£	4.50	£	25.20
24.19	Allow for replacing impact damaged trim to the roller shutter door.	6	£	35.00	£	210.00
24.20	Allow for decorating previously decorated steel entrance door section.	6	£	9.00	£	54.00
24.21	Allow for replacement of lock protection to the roller shutter doors which have become heavily corroded.	2	£	80.00	£	160.00

24.22	Allow for removal of moss growth and minor vegetation to the front of the elevation.	15	£	4.50	£	67.50
25.00	Left Hand Elevation to the Cold Store					
25.01	Allow for cleaning down of the profiled and non-profiled cladding.	90	£	4.50	£	405.00
25.02	Allow for cleaning down of steelwork and bracing.	16	£	4.50	£	72.00
25.03	Allow for replacing Impact damaged barrier	1	£	78.78	£	78.78
25.04	Allow for decorating the corrosive supports to the impact damage barriers.	4	£	9.00	£	36.00
25.05	Allow for repair work to the trim where there is evidence of impact damage.	3	£	35.00	£	105.00
25.06	Allow for repair work to gutter joints as there is visual evidence of water penetration.	4	£	35.00	£	140.00
25.07	Allow for cleaning down of the lining panels identified behind the sub-station. The panels have become heavily soiled.	15	£	4.50	£	67.50
25.08	Allow for providing remedial repair work to the corrosive metal sections of the roller shutter door.	12	£	35.00	£	420.00
25.09	Allow for cleaning down of the green cladding area which has become heavily soiled.	34	£	4.50	£	153.00
25.10	Replace missing section of rainwater downpipe.	3	£	20.00	£	60.00
25.11	Clean out blocked gutter.	1	£	13.00	£	13.00
25.12	Allow for repairing sections to the profile large vent to the front of the unit section.	1	£	1,000.00	£	1,000.00
25.13	Allow for cleaning down of soiled fascia detail.	7	£	4.50	£	31.50
25.14	Allow for redecorating localised areas on which the factory applied finish has started to come away and corrosion has been identified in two locations.	1	£	75.00	£	75.00
25.15	Allow for cleaning down of the heavily soiled brickwork to the reveal of the section.	10.5	£	4.50	£	47.25
25.16	Allow for remedial repair work to gutter.	2	£	35.00	£	70.00
25.17	Allow for replacing roller shutter door which appears to have been removed with timber boarding replaced.	1	£	2,250.00	£	2,250.00

25.18	Allow for replacing heavily corroded metal support to the roller shutter door bay loading area.	1	£	50.00	£	50.00
25.19	Allow for cleaning down of the soiled and solar degraded roller shutter door.	6	£	4.50	£	27.00
25.20	Allow for replacing 1 No. vision panel to the roller shutter door and cleaning down of 1 No. vision panel.	1	£	91.00	£	91.00
25.21	Allow for replacing 1 No. of the roller shutter door laths which has become damaged and dislodged.	1	£	400.00	£	400.00
25.22	Allow for replacing the sealant strip of the base of the roller shutter door.	1	£	45.00	£	45.00
25.23	Allow for removal of corrosion to the steelwork to the roller shutter door in isolated location.	10	£	35.00	£	350.00
25.24	Allow for replacing corroded fixings to roller shutter door.	7	£	5.00	£	35.00
25.25	Allow for removal of vegetation to the perimeter of the brickwork where noted.	8.4	£	4.50	£	37.80
25.26	Allow for decorating corroded pipework.	2.5	£	35.00	£	87.50
25.27	material to metal impact barrier.	2.5	£	35.00	£	87.50
25.28	Allow for replacing corroded flue section.	1	£	350.00	£	350.00
25.29	Allow for cleaning down of the UPVC door and metal entrance area.	9	£	4.50	£	40.50
25.30	Allow for replacing pipework which has become damaged.	1	£	100.00	£	100.00
25.31	Allow for cleaning down of the wooden apex section on the short reveal removing degraded paint finish and decorating.	1	£	250.00	£	250.00
25.32	Allow for removal of heavily degraded timber fascia boards and allow for replacing.	8	£	40.00	£	320.00
25.33	Allow for decorating previously decorated pipework which has started to become friable.	10	£	12.00	£	120.00
25.34	Allow for cleaning down of the external cladding.	36	£	4.50	£	162.00
26.00	Corrugated Lean-To on the Side					
26.01	Noted corner impact damage to cladding. Allow for replacing damaged area to the corner trim reveal.	2.7	£	80.00	£	216.00
26.02	Allow for cleaning down of the soiled cladding.	27.6	£	4.50	£	124.20

26.03	Allow for cleaning down of the small profiled roof section to the canopy.	6	£	4.50	£	27.00
26.04	Allow for replacing of damaged profile cladding due to service hole.	1	£	60.00	£	60.00
26.05	Allow for replacing trim detail above the entrance to the canopy area for metal trim detail.	1.5	£	35.00	£	52.50
26.06	Repair impact damage to profile sheet.	3	£	80.00	£	240.00
26.07	Repair damaged sliding entrance door.	1	£	103.00	£	103.00
26.08	Replace damaged profile cladding.	4	£	80.00	£	320.00
26.09	Allow for cleaning down of soiled cladding and trim detail.	30	£	4.50	£	135.00
26.10	Clean down soiled guttering with evidence of vegetation.	14	£	13.00	£	182.00
26.11	Allow for replacing rainwater downpipe which is missing.	1	£	105.00	£	105.00
26.12	Allow for removal of vegetation to the perimeter.	30	£	4.50	£	135.00
26.13	Allow for repair work to damaged profile cladding.	3	£	80.00	£	240.00
26.14	Allow for replacing damaged fire escape door.	1	£	350.00	£	350.00
27.00	Left Hand Side Reveal - Blue Section of the Corrugated Steel Shed					
27.01	Allow for cleaning down of the cladding, (89	£	4.50	£	400.50
27.02	Allow for cleaning down of gutter.	9	£	13.00	£	117.00
27.03	Allow for cleaning down of heavily soiled impact barrier.	14	£	4.50	£	63.00
27.04	Allow for replacing profile sheet which has started to corrode.	2.5	£	80.00	£	200.00
27.05	section with a fire escape door.	3.75	£	4.50	£	16.88
27.06	Allow for replacing damaged lining panel.	1	£	80.00	£	80.00
27.07	Allow for replacing missing fixings to profile cladding.	8	£	5.00	£	40.00
27.08	Clean down of cladding section.	5	£	4.50	£	22.50
27.09	Corroded roller shutter door reveal. Allow for performing remedial work.	9	£	35.00	£	315.00
27.10	Corroded steel work to roller shutter door. Allow for providing remedial repair work.	8	£	35.00	£	280.00
27.11	Timber entrance section to roller shutter door where previous roller shutter door had been removed. Allow for removal and replacing with a roller shutter door.	1	£	2,250.00	£	2,250.00

27.12	Allow for replacing impact barrier strip to roller shutter door which has become damaged.	1	£	150.00	£	150.00
28.00	Short Reveal					
28.01	Allow for replacing impact damaged trim to the base of the profiled sheeting.	6	£	35.00	£	210.00
28.02	Allow for replacing isolated areas of impact damage to profile cladding.	8	£	80.00	£	640.00
28.03	Heavily soiled section to what appears to be a previously installed roller shutter door. Allow for cleaning down of the area which has become heavily soiled.	17	£	4.50	£	76.50
28.04	Allow for cleaning down the heavily soiled trim reveal.	7	£	4.50	£	31.50
28.05	Allow for replacing of the soffit trim which has become damaged suspected due to impact.	5	£	35.00	£	175.00
28.06	Allow for replacing damage to the metal cladding trim.	2	£	35.00	£	70.00
28.07	Allow for cleaning down of the soiled brickwork below the profile cladding.	20	£	4.50	£	90.00
28.08	Removal of foam filler to the profile cladding section.	13	£	2.50	£	32.50
28.09	Allow for cleaning down of 2 No. small roller shutter doors which have become soiled and solar degraded.	14	£	4.50	£	63.00
28.10	Replace soffit to roller shutter doors which has become impact damage.	3	£	80.00	£	240.00
29.00	Left Hand Side - Cardboard Storage					
29.01	Allow for cleaning down of the soiled sections of profile cladding.	240	£	4.50	£	1,080.00
29.02	Allow for cleaning down of insulation to pipework which has become heavily soiled.	20	£	4.50	£	90.00
29.03	2 No. air conditioning units identified. Allow for fixing as one appears to be broken off the wall and servicing to ensure they are in full working condition.	2	£	3,902.24	£	7,804.48

29.04	Allow for decorating the timber windows and performing remedial repair work to affected areas.	21	£	75.00	£	1,575.00
29.05	Timber door finishes are starting to delaminate and the bottom of it has started to rot. Allow for replacing double entrance 'No Entry' door to First Aid Room.	1	£	354.00	£	354.00
29.06	Allow for removal and replacing of canopy over small stock entrance door.	4	£	200.00	£	800.00
29.07	Allow for removal of expansion foam around the entrance door to the profile sheet.	2	£	4.00	£	8.00
29.08	Allow for replacing missing pipework to the short reveal.	1	£	100.00	£	100.00
29.09	Allow for cleaning down of heavily soiled low level brickwork.	12	£	4.50	£	54.00
29.10	Delamination to corrugated profile cladding to the cardboard store identified.	30	£	12.00	£	360.00
29.11	Allow for decorating the cladding section.	1	£	450.00	£	450.00
30.00	Right Hand Side Elevation - Brick Built Building					
30.01	Allow for cleaning down of the soiled brickwork.	1	£	75.00	£	75.00
30.02	Allow for cleaning down of the soiled profile cladding and profiled lining sheets.	35	£	4.50	£	157.50
30.03	Repair work to damaged fascia trim.	1	£	35.00	£	35.00
30.04	Delamination to the small profiled lean-to roof section. Allow for removal of the roof covering and replacing.	1	£	212.00	£	212.00
30.05	Allow for ease and adjusting entrance door.	1	£	106.00	£	106.00
30.06	Allow for decorating previously decorated entrance door and framework.	1	£	150.00	£	150.00
30.07	Allow for cleaning down of windows.	20	£	2.50	£	50.00
30.08	Allow for decorating the timber wooden frame and carrying out splice repair work where required.	55	£	27.00	£	1,485.00
30.09	Allow for removal of moss growth and vegetation to the perimeter wall.	11	£	4.50	£	49.50
30.10	Allow for cleaning out gutters.	7	£	13.00	£	91.00
30.11	Allow for repair work to gutter joint.	1	£	35.00	£	35.00
30.12	previously decorated door. Allow for ease and adjust it.	1	£	250.00	£	250.00

30.13	Clean down corrugated metal cladding to plant room. (6.2 x 3.9 Height = 5 metres)	25	£	4.50	£	112.50
30.14	Allow for reinstating damaged doors and replacing of ironmongery.	1	£	177.00	£	177.00
30.15	Clean down entrance door into killing section which has become heavily soiled.	1	£	7.00	£	7.00
30.16	Clean down brickwork to high level and low level.	77	£	4.50	£	346.50
30.17	Clean down of the door. (3.3 x 3.5)	1	£	2.50	£	2.50
30.18	Decorate steelwork which has become corroded.	3.3	£	35.00	£	115.50
30.19	Allow for decorating steel framework identified.	14	£	9.00	£	126.00
30.20	Vegetation identified to the roof. Allow for cleaning down of the roof.	1	£	50.00	£	50.00
30.21	Corrugated lean-to identified to the right hand side of the brickwork. Allow for cleaning down of the profile cladding which has become soiled.	1	£	25.00	£	25.00
30.22	Replace missing cladding panels to the canopy lean-to which has been removed due to service ducts.	1	£	80.00	£	80.00
30.23	Allow for cleaning down of soiled rainwater downpipe.	7	£	4.50	£	31.50
30.24	Allow for cleaning down of rainwater gutter.	10	£	13.00	£	130.00
30.25	Allow for replacing damage to corrugated cladding in one panel section.	3	£	80.00	£	240.00
30.26	Cut edge corrosion identified to the base of the cladding. Allow for removal of affected areas and treating the cut edges.	13	£	35.00	£	455.00
30.27	Corrosion identified to the impact barriers. Allow for performing remedial repair work.	6	£	35.00	£	210.00
30.28	Impact damage to the end of the impact barrier. Allow for replacing small section. Circa 600 mm	1	£	76.00	£	76.00
30.29	Paintwork to steels has started to delaminate. Allow for removal of friable material and decorating with an appropriate measure.	50	£	9.00	£	450.00

30.30	Spalling brickwork noted to the base of the wall painted white. Allow for performing remedial works to affected brickwork and replacing where appropriate.	2.5	£	480.00	£	1,200.00
30.31	Corrosion to the metal deck underneath the lean too. Allow for removal of material and carrying out localised repair work and decorating.	50	£	27.00	£	1,350.00
30.32	Allow for reinserting misaligned rainwater downpipe.	1	£	16.00	£	16.00
31.00	Small Canopy to the Short Reveal of the Large Canopy					
31.01	Allow for cleaning down of profile cladding.	1	£	75.00	£	75.00
31.02	Replace damaged areas of cladding.	4	£	60.00	£	240.00
31.03	Allow for replacing of entrance door.	2	£	177.00	£	354.00
31.04	Allow for cleaning down of brickwork.	8	£	4.50	£	36.00
31.05	Allow for decorating the previously decorated steels where evidence of corrosion is identified.	7	£	9.00	£	63.00
31.06	Allow for replacing external fire door exit with double doors.	1	£	350.00	£	350.00
31.07	Allow for repair work to the gutter in 1 No. location.	1	£	35.00	£	35.00
31.08	Allow for cleaning down of the profile roof and removal of friable material and re-coating.	28	£	35.00	£	980.00
31.09	Allow for cleaning down of steps to the flat roof area which have become heavily soiled.	10	£	4.50	£	45.00
31.10	Replace timber lean-to shed which has become degraded.	1	£	1,500.00	£	1,500.00
31.11	Remove vegetation along the perimeter of the wall.	35	£	4.50	£	157.50
31.12	Allow for ease and adjusting the entrance doors.	1	£	103.00	£	103.00
31.13	Allow for cleaning down of the entrance door which has become soiled.	1	£	7.00	£	7.00
31.14	door which has become damaged with evidence of corrosion with the sealant strip	1	£	1,500.00	£	1,500.00
31.15	Replace high voltage cupboard doors which have become rotten and degraded.	1	£	360.00	£	360.00
31.16	Clean down and decorate vent units with evidence of corrosion.	1	£	27.00	£	27.00
31.17	Repair trim detail identified which as become evidence of impact damage.	0.5	£	35.00	£	17.50

31.18	Allow for cleaning down of canopy detail over the 2 No. roller shutter doors which have become heavily soiled with evidence of moss growth.	30	£	4.50	£	135.00
31.19	Allow for decorating previously decorated fire door entry point into cold store which has become degraded over time.	1	£	150.00	£	150.00
31.20	Allow for treating corrosion to the hinged joint.	3	£	15.00	£	45.00
31.21	Decorate hand rail barrier to entrance door.	1	£	18.00	£	18.00
31.22	Repair impact damaged frame work around roller shutter doors.	1	£	150.00	£	150.00
31.23	Clean down roller shutter doors.	13	£	2.50	£	32.50
31.24	strip to the roller shutter doors which has become degraded and severely soiled over	1	£	45.00	£	45.00
31.25	Decorate previously decorated metal dock levellers to the roller shutter doors.	2	£	135.00	£	270.00
31.26	Allow for performing remedial work to stepped crack work identified to the brickwork wall.	2	£	25.00	£	50.00
31.27	Allow for reinserting 2 No. misaligned damaged bricks.	2	£	25.00	£	50.00
31.28	Allow for cleaning down of heavily soiled brickwork with evidence of efflorescence and staining to the brickwork.	7	£	4.50	£	31.50
31.29	Clean down side cladding to the main cooler area opposite the car park.	1	£	35.00	£	35.00
31.30	Allow for cleaning out of heavily soiled gutters.	10	£	13.00	£	130.00
31.31	Allow for performing remedial repair work to stepped cracks identified into the brickwork.	9	£	25.00	£	225.00
31.32	Allow for reinstating damaged brickwork No bricks.	25	£	5.66	£	141.50
31.33	Allow for decorating the profile cladding in areas where it has started to delaminate.	20	£	9.00	£	180.00
31.34	Allow for cleaning down of low level brickwork which has become saturated due to the rain.	10	£	4.50	£	45.00
31.35	Allow for cleaning down of UPVC pipework identified.	7	£	2.50	£	17.50
31.36	Allow for replacing of damaged rainwater goods section.	2	£	35.00	£	70.00
31.37	Allow for replacing damaged timber entrance door into electric cupboard.	1	£	177.00	£	177.00

31.38	Allow for replacing heavily stained rear fire escape door.	2	£	350.00	£	700.00
31.39	Allow for replacing 1 lm of missing roof fascia board.	1	£	40.00	£	40.00
31.40	Clean down heavily soiled brickwork behind the pipework.	1	£	750.00	£	750.00
31.41	Clean down rear gutters and remove vegetation.	10	£	13.00	£	130.00
31.42	Reinsert 1 No. missing rainwater downpipe.	2	£	21.00	£	42.00
31.43	Replace missing section of rainwater gutter.	2	£	63.61	£	127.22
31.44	Replace missing section of security barrier and redecorate the remaining security barrier.	10	£	166.00	£	1,660.00
31.45	Allow for cleaning down of soiled areas of cladding.	1	£	50.00	£	50.00
31.46	Allow for replacing 1 sq m of missing cladding due to services penetrating.	1	£	80.00	£	80.00
31.47	Allow for cleaning down of heavily soiled pipework.	70	£	7.50	£	525.00
31.48	Allow for cleaning down of 2 No. small canopy and store sheds.	2	£	25.00	£	50.00
31.49	Allow for replacing 2 No. impact damaged section of cladding.	2	£	80.00	£	160.00
31.50	which has become rotten and damaged.	1	£	260.00	£	260.00
31.51	Decorate previously decorated pipework.	10	£	9.00	£	90.00
31.52	Clean down soiled low level brickwork.	1	£	4.50	£	4.50
31.53	Replace broken fascia board.	4	£	40.00	£	160.00
32.00	Portacabin					
32.01	Allow for cleaning down of all the walls to the portacabin area which have become heavily soiled.	188	£	4.50	£	846.00
32.02	Allow for cleaning down of all the soiled powder coated windows.	1	£	152.00	£	152.00
32.03	Allow for replacing damaged sections of the timber portacabin walls. (Each panel is 2.7 x 2.4 = 6.7 sq m)	1	£	5,360.00	£	5,360.00
32.04	Allow for realigning rainwater downpipes.	2	£	60.00	£	120.00
32.05						
	Allow for reinstating damaged brickwork wall.	4	£	25.00	£	100.00
32.06	Allow for performing remedial repair work to the bottom of the portacabins as the trim has been removed / damaged.	7	£	60.00	£	420.00

32.07

The painted finish to the spiral staircase to the right hand side of the portacabin area has started to delaminate. Allow for decorating. 1 £ 450.00 £ 450.00

32.08 Allow for decorating the wooden timber laths to the base of the portacabins which have been previously decorated. (full width of the unit) 1 £ 810.00 £ 810.00

32.09 Allow for treating the rear fire escape which also holds the water tank to the rear of the portacabin area. 1 £ 750.00 £ 750.00

32.10 Allow for removal of friable material and decorating the wooden store. 1 £ 150.00 £ 150.00

32.11 Allow for replacing timber rear fire door which has become damaged. 1 £ 260.00 £ 260.00

32.12 Remove vegetation to the stepped access to the rear fire door. 1 £ 72.00 £ 72.00

33.00 Warehouse Store

33.01 Allow for cleaning down cladding to the front elevation. 1 £ 250.00 £ 250.00

33.02 Allow for replacing damaged entrance door. 3 £ 780.00 £ 2,340.00

33.03 Allow for cleaning down of roller shutter doors which have become soiled with areas of corrosion. 3 £ 150.00 £ 450.00

33.04 Allow for refixing trim detail to the reveal of the roller shutter doors. 1 £ 35.00 £ 35.00

33.05 Allow for treating corrosion to the impact damaged barriers to the right hand side reveal. 3 £ 35.00 £ 105.00

33.06 Allow for cleaning down of the heavily soiled cladding lining panels. 1 £ 250.00 £ 250.00

33.07

Allow for performing remedial works to the gutters as there is a missing rainwater downpipe identified. Allow for reinserting. 2 £ 100.00 £ 200.00

34.00 Front Elevations

34.01 Allow for cleaning down of heavily soiled area. 50 £ 4.50 £ 225.00

34.02 Replace damaged roller shutter door laths. 5 £ 400.00 £ 2,000.00

34.03 Repair minor concrete repair work to 3 No. localised locations. 3 £ 75.00 £ 225.00

34.04 Replace impact damaged cladding 1 £ 160.00 £ 160.00

34.05	Corrosion identified to the end steel connecting the canopy to the main structure. Allow for performing remedial work to the full length of the canopy.	50	£	35.00	£	1,750.00
34.06	Allow for replacing 4 No. damaged sheets.	4	£	80.00	£	320.00
34.07	Clean down rainwater pipe which has become heavily soiled.	2	£	13.00	£	26.00
34.08	Clean down gutter which has become soiled with evidence of vegetation growth.	50	£	13.00	£	650.00
34.09	Clean down Georgian wired framed windows which have become soiled.		£	50.00	£	50.00
34.10	Allow for decorating the timber framework and providing remedial repair work to damaged areas. 6 No. windows.	6	£	216.00	£	1,296.00
34.11	Allow for remedial repair work to damaged cladding trim.	7	£	45.00	£	315.00
34.12	Allow for performing remedial repair work to the metal reveal of the third roller shutter door.	1	£	60.00	£	60.00
35.00	Right Hand Side Elevation					
35.01	Allow for cleaning down of the profiled cladding.				£	350.00
35.02	Allow for cleaning down of the external light diffusers.	2	£	22.50	£	45.00
35.03	Allow for impact damage to side cladding. Replace damaged cladding sections.	10	£	80.00	£	800.00
35.04	Allow for replacing damaged trim detail to the base of the cladding.				£	100.00
36.00	Rear Elevation					
36.01	Allow for cleaning down of the gutter including removal of any vegetation which has been identified.	25	£	13.00	£	325.00
36.02	Allow for replacing of rainwater downpipe which has been removed.	1	£	100.00	£	100.00
36.03	Allow for cleaning down of the soiled rear elevation.				£	350.00
36.04	Replace rear fire door which has become damaged and degraded.	2	£	325.00	£	650.00
36.05	Repair impact damaged areas of profile cladding.	21	£	80.00	£	1,680.00

36.06	Allow for removal of vegetation to the perimeter rear line of the wall including all moss growth to hardstanding area.	50	£	4.50	£	225.00
36.07	Replace rear trim detail to the far brown clad section.	1	£	45.00	£	45.00
36.08	Clean down 2 No. rear windows.	2	£	14.00	£	28.00
36.09	Allow for removal of boarding.	1	£	250.00	£	250.00
36.10	Allow for decorating and carrying out repair work to the frame.	1	£	750.00	£	750.00
36.11	Allow for rainwater downpipe to be installed on the left hand side elevation.	1	£	100.00	£	100.00
36.12	Allow to perform remedial repair works to the concrete slab in 1 No. itemised location.	1	£	50.00	£	50.00
36.13	Corrosion identified to the profile sheeting on the corner of the left hand side and rear elevation due to the continuous rainwater leak. Allow for removal of the affected cladding panels and replacing with suitable to match.	4	£	80.00	£	320.00
					£	1,800,263.46

Total

£ 1,800,263.46

Cost of Remedial Works

Cost of Works				£1,800,263.46
Contractors Preliminaries @	5.0%	5.0%		£90,013.17
Contractors Overheads and Profits @	5.0%	5.0%		£90,013.17
Total				£1,980,289.80

Construction Fees

Professional fees @	10.0%	10.0%		£198,028.98
Principle designer in accordance with CDM regulations @	2.0%	2.0%		£39,605.80
Total				£237,634.78

VAT

VAT on Remedial Works	20.0%	20.0%		£360,052.69
VAT on Construction Fees	20.0%	20.0%		£47,526.96
Total VAT				£407,579.65

Total cost (Inc Vat)

£2,625,504.22

Response Form

Haughley [Parish] Neighbourhood Development Plan 2016 - 2036

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:	Catesby Estates plc c/o Strutt & Parker
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:	Strutt & Parker
Address:	66-68 Hills Road Cambridge
Postcode:	CB2 1LA
Tel No:	01223 459456
E-mail:	William.nichols@struttandparker.com

Section Two: Your representation(s)

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

Paragraph No.		Policy No.	HAU5
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

Please see attached cover letter by Strutt & Parker dated 5th March 2019.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please see attached cover letter by Strutt & Parker dated 5th March 2019.

(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 ...

A hearing is not considered 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	X
The final 'making' (adoption) of the Haughley NDP by Mid Suffolk District Council	X

Signed: William Nichols

Dated: 5th March 2019

Cambridge office

Strutt & Parker
66-68 Hills Road
Cambridge
CB2 1LA
Telephone 01223 459500

Cambridge@struttandparker.com
struttandparker.com



Haughley Neighbourhood Plan Consultation
C/o Mr Paul Bryant
Spatial Planning Policy Team
Babergh & Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Direct Dial: 01223 459456
Email: william.nichols@struttandparker.com

5th March 2019

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

Dear Sir or Madam

Re: Haughley Neighbourhood Plan (2016-2036), Land West of Fishponds Way, Haughley

I write on behalf of Catesby Estates plc and in relation to the Haughley Neighbourhood Plan Submission Plan consultation. Strutt & Parker is the planning agent instructed by Catesby Estates plc to submit representations on the Haughley Neighbourhood Plan consultation process, which runs from Monday 21 January to Wednesday 6 March 2019.

These comments following on from our previous comments on the Pre-Submission Plan for Haughley Parish, together with the Supporting Documents, which were submitted in July 2018 and are appended to this response for reference.

I have reviewed the latest Submission Plan including Supporting Documents, and Catesby Estates is pleased to have another opportunity to comment on the Neighbourhood Plan specifically in relation to the land West of Fishponds Way, which it is promoting for the development of up to 65 new homes. This letter is accompanied by a completed Response Form.

Catesby Estates has also previously submitted representations to the emerging Babergh and Mid-Suffolk Joint Local Plan strongly supporting the proposed approach of identifying broad locations for development and asking local communities, such as Haughley, to identify the sites to meet housing needs through the Neighbourhood Plan process. Babergh and Mid Suffolk District Councils had intended to consult upon its draft Joint Local Plan in February/March 2019, but this has been delayed slightly and will now be consulted upon after the local elections, which take place on 2nd May 2019.

The Government introduced neighbourhood planning as a means to encourage communities to take greater ownership of the issues affecting them and as the means to deliver to sustainable growth, which communities need. We commend the Parish Council and Neighbourhood Plan Group for the work they have done to date and the leadership shown, and consider this proactive approach has enabled the local community to determine where development should be located.

The Haughley Neighbourhood Plan Group has undertaken extensive consultative work to inform its Neighbourhood Plan, and it is entirely appropriate given the wider Government localism agenda, that all sites put forward through the Neighbourhood Plan consultation have been properly and fairly assessed by the Neighbourhood Plan Group and the local community as part of due process. This process has now concluded and AECOM's Site Assessment process has made a series of recommendations about the most suitable and appropriate development sites in the village. This approach is supported, as it is appropriate that the local community leads the discussion on which site



or sites should accommodate Haughley's growth. Catesby Estates therefore supports the process that has been undertaken and would like to reiterate its commitment to future engagement.

We note following our previous representations to the NP (enclosed) that the wording of Policy HAU5 and the associated site allocation area has not changed. Whilst we are broadly supportive of the principle of the policy and allocation, we consider that the policy wording needs to be more flexible/amended to reflect the potential to appropriately accommodate a higher quantum of development on the site. The extent of the allocation area should also be increased to reflect the indicative masterplan submitted as part of Catesby Estates outline planning application (ref DC/18/04773) (enclosed) which appropriately locates the proposed open space for the development on land outside the proposed Neighbourhood Plan allocation boundary.

In response to Policy HAU5, the land west of Fishponds Way does not have any significant site constraints, which would preclude the delivery of more housing on the site and additional open space. Policy HAU5 references the trees to the south-west, proximity to Flood Zone 1 and 2 and to the sewerage works to the north-west as the main site constraints. It also references the potential to deliver between 20-50 new homes and a housing density of no higher than 23 dwellings per hectare. The policy also requires development to include 35% affordable housing to address local need. None of these requirements would be adversely impacted by the changes that we put forward in our previous representations.

In this context, Catesby Estates has submitted an outline planning application (ref: DC/18/04773) for up to 65 dwellings on the allocated housing site (ref: SS0047 – west of Fishponds Way). However, the application site area includes the land to the north – between the sewerage works and rear boundaries of the existing dwellings along Fishponds Way. The ability to appropriately accommodate up to 65 homes reflects an indicative housing mix incorporating a greater proportion of smaller homes (44% of the homes are 1 and 2 bedroom properties, including 4 bungalows and 8 x 1 bed maisonettes) which was requested by local residents and Haughley Parish Council to respond to local housing need in Haughley.

The direct consequences of incorporating a greater proportion of smaller properties, is that more dwellings can be accommodated within the developable area without over developing the site. This approach was discussed in principle with Haughley Parish Council prior to the submission of the outline planning application.

In terms of density, the net developable area for the outline application is 2.01 hectares, which, based on a proposed development of 65 homes, equates to a net density of 32 dwellings per hectare (12.7 dwellings per hectare (dph) gross density) which would be in keeping with the existing densities of the village's peripheral estates to the north east of the site. Applying the upper Neighbourhood Plan figure of 50 homes would equate to a net density of 25 dwellings per hectare (10 dph gross), which we consider would represent an inefficient use of the site. More importantly, it would not be in accordance with Core Strategy Policy CS0, which states that new housing in such areas should achieve average densities of at least 30 dwellings per hectare.

Therefore, we believe these are significant benefits to Haughley for making policy HAU5 and the site allocation in the NP more flexible by increasing the quantum of development allocated to up to 65 homes. This would represent an opportunity to respond directly to local housing needs for local people and enable the provision of a large area of public open space which would be available to existing local residents. This would ensure consistency and reflect the existing proposal which is supported by the case officer and Haughley Parish Council.

It is also important to note that, during the statutory consultation stage of the planning application, the proposed development for up to 65 homes has not received any objections from the following consultees:

- Place Services Ecology;
- Suffolk Wildlife Trust;
- Suffolk Police;
- Environment Agency;
- Suffolk County Council Archaeological Service;

- Suffolk County Council Suffolk Fire and Rescue Service;
- Suffolk County Council, Flood and Water Management;
- Babergh and Mid-Suffolk Environmental Management (Air quality, Sustainability, Land Contamination);
- Babergh and Mid-Suffolk Heritage Team;
- Babergh and Mid-Suffolk Waste Services;

The case officer has recommended Catesby Estates planning application for approval and it will be presented to Planning Committee on 13th March 2019.

In summary, Catesby Estates plc is broadly supportive of the Submission Neighbourhood Plan for Haughley but recommends that Policy HAU5 be amended to allow a degree of flexibility on total numbers to enable the efficient use of land in particular light of the proposed delivery of a greater proportion of smaller units.

I trust that the above is self-explanatory, however if you would like to discuss the content of the letter and/or the enclosed representation form, please do not hesitate to contact me.

Yours sincerely

William Nichols
Senior Associate Director
Cambridge Planning
Strutt & Parker

Enc: Completed Haughley neighbourhood plan representation form
Pre Submission Representations to the Neighbourhood Plan (July 2018)

Cc: Ed Barret (Catesby Estates plc), Guy Jenkinson (Strutt & Parker), Rosemary Welburn

Cambridge office

Strutt & Parker
66-68 Hills Road
Cambridge
CB2 1LA
Telephone 01223 459500



Cambridge@struttandparker.com
struttandparker.com

Haughley Neighbourhood Plan Group
C/o Haughley Parish Council

Direct Dial: 01223 459456
Email: william.nichols@struttandparker.com

6th July 2018

Sent by email to: chrisadams638@btinternet.com and properofficer@haughley.org.uk

Dear Sir or Madam

Re: Haughley Neighbourhood Plan, Land West of Fishponds Way, Haughley

I write on behalf of Catesby Estates plc and in relation to the Haughley Neighbourhood Plan Pre-Submission Plan consultation exercise. Strutt & Parker is the planning agent instructed by Catesby Estates plc to submit representations on the Haughley Neighbourhood Plan consultation process, which runs from Friday 25th May 2018 to Saturday 7th July 2018.

I have reviewed the Pre-Submission Plan for Haughley Parish, together with the Supporting Documents, and Catesby is pleased to have the opportunity to comment on and support the Neighbourhood Plan in relation to Land West of Fishponds Way. This letter is accompanied by a neighbourhood plan representation form, and an illustrative draft masterplan. It should be noted that this masterplan is currently being amended to take account of recent feedback from the parish council, county and district ward councillors and the wider local community.

I would like to point out that the site has been referred to within the draft Neighbourhood Plan as 'Land South of Fishponds Way', which is incorrect. It is requested that for clarity and consistency the site should be referred to as 'Land West of Fishponds Way'.

Catesby Estates plc has been actively promoting land west of Fishponds Way, Haughley for a residential scheme and associated open space through the development plan process. We have sought to engage with the local community in order to gain a better understanding of the desires and wishes of local residents, businesses, and the community as a whole.

Catesby Estates plc has attended meetings of the Parish Council, attended Neighbourhood Plan meetings/events, and held its own community consultation exercise in advance of the preparation of a planning application. This consultation event, which ran from 1pm to 8pm on Friday 30th June 2018 was well attended by members of the local community. A wide variety of comments were received including the mix of housing, the importance of protecting the hedgerow along the frontage on to Fishponds Way, the provision of open space, the new footpath linkages, and the importance of a high quality design that fits into the village. We are now reviewing the comments and feedback received; this will then be used to inform the final scheme when it is submitted to Mid-Suffolk District Council later this year.

In addition, a pre-application enquiry and subsequent meeting with Mid-Suffolk District Council at which a representative from Suffolk County Council was in attendance. These meetings, together with local community engagement have enable Catesby Estates plc to gain a good understanding of the key local issues, and these are being taken into account as the design proposals are formulated.

Catesby Estates plc has previously submitted representations to the emerging Local Plan strongly supporting the proposed approach of the Local Plan, identifying broad locations for development and asking local communities,





such as Haughley, to identify the sites to meet housing needs through the Neighbourhood Plan process. The Government has introduced neighbourhood planning as a means to encourage communities to take greater ownership of the issues affecting them and as the means to deliver to sustainable growth, which communities need. We commend the Parish Council and Neighbourhood Plan Group for the work they have done to date and the leadership shown, and consider this proactive approach has enabled the local community to determine where development should be located.

The Haughley Neighbourhood Plan Group has undertaken extensive consultative work to inform its Neighbourhood Plan, and it is entirely appropriate given the wider Government localism agenda, that all sites put forward through the Neighbourhood Plan consultation have been properly and fairly assessed by the Neighbourhood Plan Group and the local community as part of due process. This process has now concluded and AECOM's Site Assessment process has made a series of recommendations about the most suitable development sites in the village. This approach is supported as it is appropriate that the local community leads the discussion on which site or sites should accommodate Haughley's growth. The implications of allowing a circumvention of the plan-led system are that it risks negating the entire neighbourhood plan process, alienating local people who have made a commitment to preparing a Neighbourhood Plan. Catesby Estates plc therefore supports the process that has been undertaken and would like to reiterate its commitment to continual engagement in this process.

Catesby Estates plc continues to support the Parish Council in its approach to determining the future of Haughley through the Neighbourhood Plan process and believes that the approach taken to identifying the sites for development has been underpinned by a comprehensive evidence base justifying the respective sites' proposed allocations. This approach ensures that the people of Haughley have a significant say on shaping their community over the coming years.

Catesby Estates is in the process of preparing an outline planning application on Site SS0047 (land west of Fishponds Way). We are working with the neighbourhood plan group to ensure a scheme that can be supported by the local community. The early submission of a planning application will assist the neighbourhood plan group in being able to demonstrate clearly the deliverability of the allocations within its plan.

I trust that the above is self-explanatory, however if you would like to discuss the content of the letter and/or the enclosed representation form, please do not hesitate to contact me.

Yours sincerely

William Nichols
Senior Associate Director
Cambridge Planning
Strutt & Parker

Enc: Completed Haughley neighbourhood plan representation form
Illustrative Draft Masterplan

Cc: Ed Barret, Katie Yates, and David Morris (Catesby Estates plc), Guy Jenkinson (Strutt & Parker), Rosemary Welburn

Pre-Submission Consultation Response Form Haughley Parish Neighbourhood Plan

Welcome to the Haughley Parish Neighbourhood Plan Pre-Submission Consultation Response Form

BACKGROUND

This is the pre-submission version of the Haughley Parish Neighbourhood Plan. Haughley Parish Council, through its Working Party, has prepared the Plan on behalf of those that live and work within the Parish of Haughley. The Plan sets out a future vision for the Parish. The vision is supported by a set of planning policies and a series of Community Needs and Desires (CNDs)

YOUR INPUT

Please tell us whether you agree with these policies and CNDs by completing the consultation document. You can complete it on the internet at <https://www.surveymonkey.co.uk/r/hpnpp-scrf>, or if you prefer, go to www.haughley.org.uk where you will find a link to the Form. If you would like to comment on any of the policies and CNDs, please add these comments in the box under each policy or CND. Please answer all the questions. The full draft Plan is available on the internet (go to www.haughley.org.uk) or as a printed copy to read at The King's Arms, St. Mary's Church, Maxwell Charnley Room, Village Hall, Haughley Veterinary Centre, Mere View and Thompson Court.

COMPLETION DATE - 5.00pm Saturday, 7th July 2018

Please respond on-line. Alternatively, complete a hard copy document and deliver it to one of the Consultation Form boxes located in the venues noted above. So that we might in certain circumstances respond to your comments on the Plan, we need your name and address and preferably email address.

NAME:

ORGANISATION:

ADDRESS:

EMAIL ADDRESS:

DATA PROTECTION NOTICE: Information given on this form will be used to help prepare the Submission Draft Haughley Parish Neighbourhood Plan. Please be aware that your comments, including personal details, may be made publicly available.

Should you require assistance with completing this Form, please visit one of the Public Events or Drop-in Surgeries listed below.

Public Events:

Friday, 25 May 4pm - 7pm, Green Room, Village Hall

Saturday, 26 May 9:30am - 3:30pm, Village Hall

Saturday, 9 June 12pm - 4pm, Summer Fete, Playing Field

Drop-in Surgeries:

Saturday, 23 June 9am - 12pm, Maxwell Charnley Room

Saturday, 7 July 9am - 12pm, Maxwell Charnley Room

Thank you for your comments and for completing this form

[MSDC NOTE: The remainder of this Form was an interactive PDF file. Consequently, many of the comments on individual policies made by Strutt & Parker were part hidden or do not appear when this file is printed out. For transparency, we present below a faithful reproduction of all their comments on the Reg 14 version of the NP.]

NEW HOUSING & DEVELOPMENT POLICIES

HAU1 - Agree. Our client is supportive of this policy. In particular, by ensuring that proposals respect the scale, density, and character of the existing settlement, it is considered that future developments within the settlement boundary will be sustainable. Furthermore, it is important to develop sites within the settlement boundary which do not form part of the local character, especially when one considers the District Council's five-year housing land supply position.

HAU2 - Agree. Policy HAU2 sets out the neighbourhood plan area's approach to development within Haughley's settlement boundaries. The provisions of the policy will facilitate a high quality form of development and the approach is supported. The proposed scheme at land west of Fishponds way will be designed to ensure that it is in accordance with this policy.

HAU3 - No comment to make

HAU4 - No comment to make

HAU5 - Agree but with some amendments.

Policy HAU5 should be amended so that the site is referred to as land 'west of Fishponds Way' rather than land 'south of Fishponds Way. This is for clarity and to ensure consistency, and to avoid any unnecessary confusion.

Policy HAU5 proposes to allocate land west of Fishponds Way for development and states that the site 'has the potential to deliver between 25-50 new homes', acknowledging the minor constraints of the developed tree line, proximity to flood risk, and the sewerage works. The proposed allocation of the site is strongly supported on the basis that it represents the most appropriate location for development within Haughley.

The neighbourhood plan group's decision to include the site as a proposed housing allocation is underpinned by a careful undertaken evidence base and site assessment process, which was undertaken by independent consultants, AECOM. The AECOM Site Assessment Report concluded that land west of Fishponds Way was 'considered appropriate to be brought forward for development' on the basis that it is 'adjacent to the settlement boundary and thorough assessment' considers it to be 'the best fit continuing the natural progression of growth of the form and setting of this rural village'.

The AECOM site assessment report stated that land west of Fishponds Way was 'available and appropriate for development', and that the develop-able area should be reduced to allow for a buffer between the potential housing and the water treatment works, and also to remove the southern edge of the site within Flood Zones 2 and 3.

The policy approach is broadly supported and the proposed scheme is being carefully designed to take account of the key elements of the policy. The proposal will incorporate a mix of dwelling types and sizes. It will include 35% affordable housing. It will also include sufficient outdoor green space and a high standard of landscaping as well as good pedestrian linkages to enable residents to walk to all the facilities in the village centre.

It is considered that the policy should be slightly amended to allow for a greater degree of flexibility in relation to the precise housing range and the overall housing density. In initial consultation exercises there has been some feedback from respondents about enabling a mix

of housing that allows for younger couples/families to 'climb on to the housing ladder', and enables some older people currently living in the village to downsize to smaller properties. It is therefore recommended that a greater level of flexibility is inserted into this policy to enable an appropriate mix of dwellings to be determined by the neighbourhood plan group. This level of flexibility should also apply to the proposed density on site so that this can meet the requirements of the local community.

HAU6 - No comment to make

HAU7 - No comment to make

HAU8 - Agree. The inclusion of suitable infrastructure to enable high speed broadband to be connected is supported.

HISTORIC BUILT ENVIRONMENT

HAU9 - Agree. Policy HAU9 sets out the neighbourhood plan's approach to development affecting Haughley's Built Heritage Assets. This approach is supported and Catesby Estates plc's proposed scheme will ensure that all heritage assets within close proximity are not unacceptably impacted upon. Careful consideration has been given to the listed building immediately adjacent to the site, and to views towards the local parish church, The Assumption of the Blessed Virgin Mary.

HAU10 - No comment to make

HAU11 - Agree. Policy HAU11 sets out the neighbourhood plan's approach to development design and character - the policy approach is supported.

FACILITIES & SERVICES POLICIES & COMMUNITY NEEDS AND DESIRES

HAU12 - Agree.

The protection of local community facilities is supported. The proposed development at land west of Fishponds Way will include an area of open space, and new footpaths providing benefits both to future residents of the scheme as well as the wider local community.

HAU13 - No comment to make.

CND1 - No comment to make.

CND2 - No comment to make.

CND3 - No comment to make.

ENVIRONMENT POLICIES

HAU14 - Agree. Policy HAU14 sets out the approach to the protection of local green space - this approach is supported. Additionally, it should be noted that the proposed development of land west of Fishponds Way will incorporate a large area of public open space, together with new footpaths to be used both for new residents on the site, as well as the wider local community.

HAU15 - No comment to make.

HAU16 - Agree. Policy HAU16 sets out the neighbourhood plan's approach to paths and bridleways. The proposed development at land west of Fishponds Way provides a unique opportunity to significantly enhance public linkages between Haughley and Stowmarket by providing a new pedestrian crossing linked to a new footpath proposed to run parallel to Fishponds Way immediately behind the existing hedgerow, within the boundary of the allocation. Catesby Estates plc will also work with the parish council, neighbourhood plan group, Suffolk County Council and neighbouring landowners to facilitate the continuation of this footpath over the bridge/stream and linking it to the existing bridleway and footpath just south of the village.

TRAFFIC COMMUNITY NEEDS and DESIRES

CND4 - No comment to make.

CND5 - Agree. It is noted that there is a desire among the local community to investigate and actively pursue the upgrading of the footpath and provision of a footpath where none currently exists between Tothill and the Eve Balfour Way junction on Fishponds Way, making it suitable for all pedestrians, buggies, wheelchairs, horses, and cyclists. This aspiration is strongly supported and the proposed development at land west of Fishponds Way will incorporate and facilitates within the site boundary to add to these key connectivity enhancements.

CND6 - No comment to make.

CND7 - No comment to make

OVERALL, DO YOU AGREE WITH THE DRAFT NEIGHBOURHOOD PLAN?

Yes but with some amendments.














For clarity and to avoid unnecessary confusion, the site land 'South of Fishponds Way' should be referred to as land 'West of Fishponds Way'.

Notwithstanding the minor recommended amendments, Catesby Estates plc supports the neighbourhood plan group in its approach to determining the future of Haughley through the Neighbourhood Plan process and believes that the approach taken to identifying the sites for development has been underpinned by a comprehensive evidence base justifying the respective sites' proposed allocations. This approach ensures that the people of Haughley have a significant say on shaping their community over the coming years.

It is considered that Policy HAU5 should incorporate a degree of additional flexibility with regard to the number of dwellings and housing density. This will facilitate an appropriate mix of dwellings to be provided, enabling the highest possible quality scheme to be delivered.

[Ends]



- LEGEND**
-  Site boundary
 -  Existing vegetation: woodland, trees and hedgerows
 -  Proposed dwelling
 -  Proposed primary street
 -  Proposed secondary street
 -  Proposed private drive
 -  Proposed footpaths
 -  Proposed public open space
 -  Proposed detention basin
 -  Proposed trees
 -  Proposed hedgerows
 -  Proposed play area
 -  Proposed pumping station

LDĀ DESIGN

PROJECT TITLE
**LAND WEST OF FISHPONDS WAY,
 HAUGHLEY**

DRAWING TITLE
Illustrative Masterplan

ISSUED BY	Peterborough	T: 01733 310471
DATE	Jun 2018	DRAWN JB
SCALE@A3	2,000	CHECKED CMI
STATUS	Draft	APPROVED CMI

DWG. NO. 6411_102_Masterplan

No dimensions are to be scaled from this drawing.
 All dimensions are to be checked on site.
 Area measurements for indicative purposes only.

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Sources: Ordnance Survey

Response Form

Haughley [Parish] Neighbourhood Development Plan 2016 - 2036

Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	Richard Brown
Job Title (if applicable):	
Organisation / Company (if applicable):	Richard Brown Planning Limited
Address:	18 Redwood Burnham Buckinghamshire
Postcode:	SL1 8JN
Tel No:	01628 663638
E-mail:	richard@richardbrownplanning.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Christchurch Property Company Limited
Address:	International House 6 South Street Ipswich Suffolk
Postcode:	IP1 3NU
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.	11.7-11.9,11.12,11.16	Policy No.	HAU1
----------------------	-----------------------	-------------------	------

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

Support Support with modifications Oppose Have Comments

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

Please be as brief and concise as possible ..

Please see attached

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Please see attached

(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 ...

There are matters relating to the housing requirement, the soundness of the plan and further sites should be allocated. These merit consideration at a hearing

(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 Haughley NDP by Mid Suffolk District Council	✓

Signed: *Rbrown*

Dated: 06/03/19

TOWN AND COUNTRY PLANNING ACT 1990

**REPRESENTATIONS TO THE
HAUGHLEY NEIGHBOURHOOD PLAN 2016-2036
SUBMISSION PLAN**

**LAND NORTH OF FISHPONDS WAY,
HAUGHLEY, SUFFOLK**

**RICHARD BROWN MSc
RICHARD BROWN PLANNING LIMITED
18 REDWOOD
BURNHAM
BUCKINGHAMSHIRE
SL1 8JN**

6 MARCH 2019

Land North of Fishponds Way, Haughley, Suffolk

1. Mid Suffolk District Council

1.1 The statutory Development Plan includes the following documents:

- (i) The Mid Suffolk District Local Plan 1998 (MSDLP) which was saved in accordance with the Secretary of State's Direction dated 14 September 2007;
- (ii) The Mid Suffolk District Core Strategy 2008 (CS), as adopted in September 2008 covering the period until 2025; and
- (iii) The Core Strategy Focused Review 2012 (CSFR) as adopted on 20 December 2012 covering the period until 2027.

1.2 Mid Suffolk District Council are currently preparing a new Joint Local Plan with Babergh District Council which will replace the 2006 Local Plan and Core Strategy. The new joint Local Plan will guide development up to 2036. The Council consulted on the Regulation 18 version of the Plan Autumn 2017. The Regulation 19 Publication draft Local Plan is intended to be consulted upon in Spring 2019 , with submission expected for Summer 2019, examination late Summer 2019 and adoption Winter 2019/early 2020.

1.3 The Haughley Parish Neighbourhood Plan 2016-2036 Submission Plan was formally submitted to Mid Suffolk District Council on 21st December 2018. In accordance with Regulation 16 of The Neighbourhood Planning (General) Regulations 2012, the District Council will undertake formal consultation on the content of the Haughley NDP. This consultation will run from Monday 21st January 2019 to Wednesday 6th March. The Parish Council will then have an opportunity to respond to any of the representations before the Plan is submitted for examination The Plan will then be assessed by an Independent Examiner, who will decide whether the Plan meets the Basic Conditions or whether further modifications are required for it to do so. The Examiner will then decide if the Plan can proceed to the Referendum stage.

- 1.4 The Haughley NDP as confirmed at paragraph 9.1 of the NDP has been prepared using the National Planning Framework (2012) and whilst a more recent version has been published, under the transitional arrangement for plans submitted before 24th January 2019 would be examined against the 2012 Framework
- 1.5 The NPPF 2012 paragraph 2 : *“The National Planning Policy Framework must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.”*
- 1.6 Paragraph 184 of the NPPF 2012 confirms that;
- “Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.”*
- 1.7 Paragraph 9.2 of the Haughley NDP confirms that; *“It also has to be in general conformity with Babergh and Mid Suffolk District Councils’ Strategic Planning Policies, which are contained in the Mid Suffolk Core Strategy, the Core Strategy Focused Review, the Stowmarket Area Action Plan and the 1998 Local Plan. Within the Mid Suffolk Core Strategy, Haughley is designated as one of 10 key Service Centres. Under a new Joint Local Plan (JLP) that is being prepared, Haughley is categorised as a “Core Village””*
- 1.8 The Haughley NDP has used the emerging Joint Local Plan for the Housing requirement based on the SHMA housing requirement of 452dpa. However, As confirmed in the recent Woolpit Appeal Decision (APP/W3520/W/18/3194926) at paragraph 63;

“It is common ground that the Council’s strategic policy for housing numbers is more than five years old and has not been reviewed. Accordingly paragraph 73 of the NPPF 2018 indicates that the Council’s housing land supply is to be assessed against the standard method for calculating local housing need. The Council’s local housing need is 585 dwellings per annum (dpa) and a 20% buffer is to be applied. This amounts to 3,510 dwellings for the next five years, or 702 dpa.”

- 1.9 The Mid Suffolk District Council Housing Land Supply position Statement 2018/19 (January 2019) states at Table 2 in paragraph 2.23 that the Local Housing Need requirement is 590 dpa with a 20% buffer making a total requirement of 708dpa.

- 1.10 Haughley Parish Council have used these strategic policies to shape their NP but where the emerging Local Plan has a much higher objectively assessed need. It is therefore submitted that the Haughley NDP to be considered sound should allocate appropriate housing sites such as land north of Fishponds Way and set out a strategy for dealing with the increase in housing numbers.

2 Haughley, Suffolk

2.1 The settlement Hierarchy identified in the 2008 Core Strategy confirms:

- Ipswich fringe area
- Urban areas and market towns
- Core villages
- Hinterland villages
- Hamlets and countryside

2.2 Haughley is categorised as a “Core Village”, meaning that it has a high level of services and facilities that are judged to be of importance in relation to sustainability and vitality of the local community.

2.3 The facilities and shops within the village include:

- General store
- Post Office
- Vets
- Public house
- Village Hall, Pavilion & Community
- Meeting Rooms
- Church
- Primary School
- Pre-school

2.4 With Haughley being categorised as a “Core Village” within the hierarchy identified in the Core Strategy it, therefore, follows that sites need to be allocated in and around the village. The village is considered to be a sustainable location for housing growth.

3 Sustainable development

3.1 The National Planning Policy Framework (2012) to which the Haughley NDP is being examined against, states at paragraph 14:

“At the heart of NPPF is a presumption in favour of sustainable development which should be seen as golden thread running through both plan making and decision taking. For plan making this means that local planning authorities should positively seek opportunities to meet the development needs of their area; local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change, unless: any adverse impact of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole....”

3.2 Sustainable development is, however, demonstrated where a proposal presents a net gain across the three dimensions of sustainable development, namely:

- An economic role
- A social role
- An environmental role

3.3 The Framework does not set out any cap or ceiling on new housing development. The Framework emphasises that the Social role of sustainable development is:

“Supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations”

The Economic objective

3.4 The provision of circa 120 new homes will lead to the provision of a substantial number of jobs during the construction phase of development.

When occupied, occupiers will generate further direct and indirect employment through the purchase of goods and services. The new population will contribute to the vibrancy and vitality of Haughley and help the settlement retain existing and potentially sustaining new services and facilities. There will also be benefit resulting from the housing which will house population who will work in the new employment provision in the Local Plan thus helping support the economic strategy of the Plan.

The Social Role

- 3.5 This site is well related to the settlement of Haughley and provides a high level of accessibility to jobs and services within the Settlement. The location provides choice, particularly for small households seeking to purchase a home in the village. The constraining of housing choice in the settlement will have caused social inequality as house prices inevitably rise, existing stock is extended and opportunities for starter home and downsizing opportunities will have led to an unbalanced village demographic. The introduction of housing choice, including affordable housing will assist redress any imbalance.
- 3.6 The scale of the land promotion is such that it will appeal to small and medium house builders as advocated by the Government's 2017 Housing and Planning White Paper.
- 3.7 It is considered that substantial weight should be given to the supply of market housing and affordable housing. This proposal will contribute towards meeting this need and it is confirmed that there are no viability factors will reduce the quantum of affordable housing the site can provide as no abnormal development costs are anticipated.
- 3.8 The proposals seek to open up the site to public access, by creating new footpaths, green infrastructure, biodiversity gains and recreation areas. This would accord with the aims of the Framework to provide significant community and environmental benefits as detailed elsewhere in the submissions. This is social gain and can assist creation of healthy communities and accords with the Chapter 8 of the Framework specifically paragraphs 69 and 73.

The Environmental Role

- 3.9 The lower end of the site has significant potential to complement a residential development by accommodating open space; SuDs features and biodiversity enhancements. The loss of greenfield land is considered to have limited weight against the allocation of the site in the Neighbourhood Plan process moving forward. The site provides little amenity value, and has been used for agriculture for many years. A net biodiversity gain is achievable.
- 3.10 It is submitted that Haughley constitutes a sustainable location in the context of the Mid Suffolk administrative area, a fact reflected in the classification of the settlement in the settlement hierarchy. Given the scale of the settlement, its existing services and facilities, and its access by bus and cycling to rail connections at Stowmarket, which offers services to destinations such as Norwich, Cambridge, London, Ipswich and Peterborough -it is therefore a location capable of accommodating appropriate growth.

4 Housing land Requirement

- 4.1 Paragraph 11.9 of the NDP identifies that the Plan will deliver a ‘maximum’ of up to 150 new homes to 2036. It is contented that it is inappropriate to define this figure as a ‘maximum’, as housing figures contained within Local Development Plans should always be considered as ‘minimum’ figures.
- 4.2 Furthermore, the NDP has based this housing figure on the evidence contained within the emerging Joint Local Plan (JLP) that Mid Suffolk District has a residual need for new housing between 2017 and 2036 of 5,820 new dwellings (total need of 9,951 dwellings at a rate of 452 dwellings per year). This is despite the NDP stating at paragraph 9.17 that it attributes ‘little weight’ to the emerging JLP.
- 4.3 The Government has recently introduced a standard method for calculating housing need through national planning guidance, based on the 2014 sub-national household projections. When it progresses, the emerging JLP will be required to revisit its housing requirement to accord with the standard methodology. The standard methodology indicates a potential housing need figure of 573 dwellings per annum for Mid Suffolk District (2014-based data), some 121 in excess of their current OAN figure. As such, when the JLP is adopted, the NDP will become out of date in respect of housing need and its relevant policies will be superseded. It is therefore recommended that, whilst the NDP is being examined under the provisions of the 2012 NPPF, it should base its housing figure on the housing requirement for Mid Suffolk District as prescribed by the standard methodology, in order to remain up-to-date in the longer term.

5 The Site

5.1 The site (Appendix 1) has been identified as a potential development site (SS0149) in the Babergh and Mid-Suffolk Joint Local Plan: Strategic Housing and Economic Land Availability Assessment (SHELAA) August 2017 and in the Haughley Neighbourhood Development Plan 2016-2036.

5.2 The site is identified in the SHELAA as having the potential to accommodate 120 dwellings which confirms the location is suitable for residential development – the SHELAA extract does however identify some limited constraints, which are considered and which do not preclude development of the site;

“Highways – regarding access, footpaths and infrastructure required

Landscape – small area within SLA

Heritage – impact on heritage assets

Flood – small area within Flood Zone 3

Townscape – impact if whole site developed”

5.3 As noted above from the SHELAA there has been identified constraints, which need to be considered in order to make the site acceptable in planning terms.

5.4 There are two potential access points with the public highway. The first is onto Fishponds Way and the second is via Ladyfield.

5.5 The Ladyfield point of access is an important one in terms of providing pedestrian and cycle accessibility and could also serve as an emergency access. The proposed access is via Fishponds Way. This is best achieved through the formation of a new three arm roundabout.

- 5.6 Landscape – the concerns are the impact on the Special Landscape Area, which is at the southern edge of the site. It is considered that with appropriate mitigation through the use of appropriate master planning that development of this site would be unlikely to have a detrimental impact on the Special Landscape Area (SLA)
- 5.7 Heritage – The AECOM Site Assessment Report that accompanies the Haughney NDP confirms that in terms of Heritage considerations that the site will “*have Limited or no impact or no requirement for mitigation*”.
- 5.8 In terms of physical constraints, the vast majority of the site is located outside the flood plain (Appendix 2). However, the woodland portion of the site to the south is located in Flood Zone 3, with a small portion to the north of this being located in Flood Zone 2. It is proposed that no built development would take place in Flood Zones 2 or 3.
- 5.9 Townscape - The site is subjected to relatively minor changes in levels, it is acknowledged that the land slopes down from the north to the south. It is considered that with the retention of existing vegetation around the site, and addition of new tree planting which would soften the built form and reflect the existing well-vegetated edge of the village, which would assist the development integrating with the existing landscape and built form.

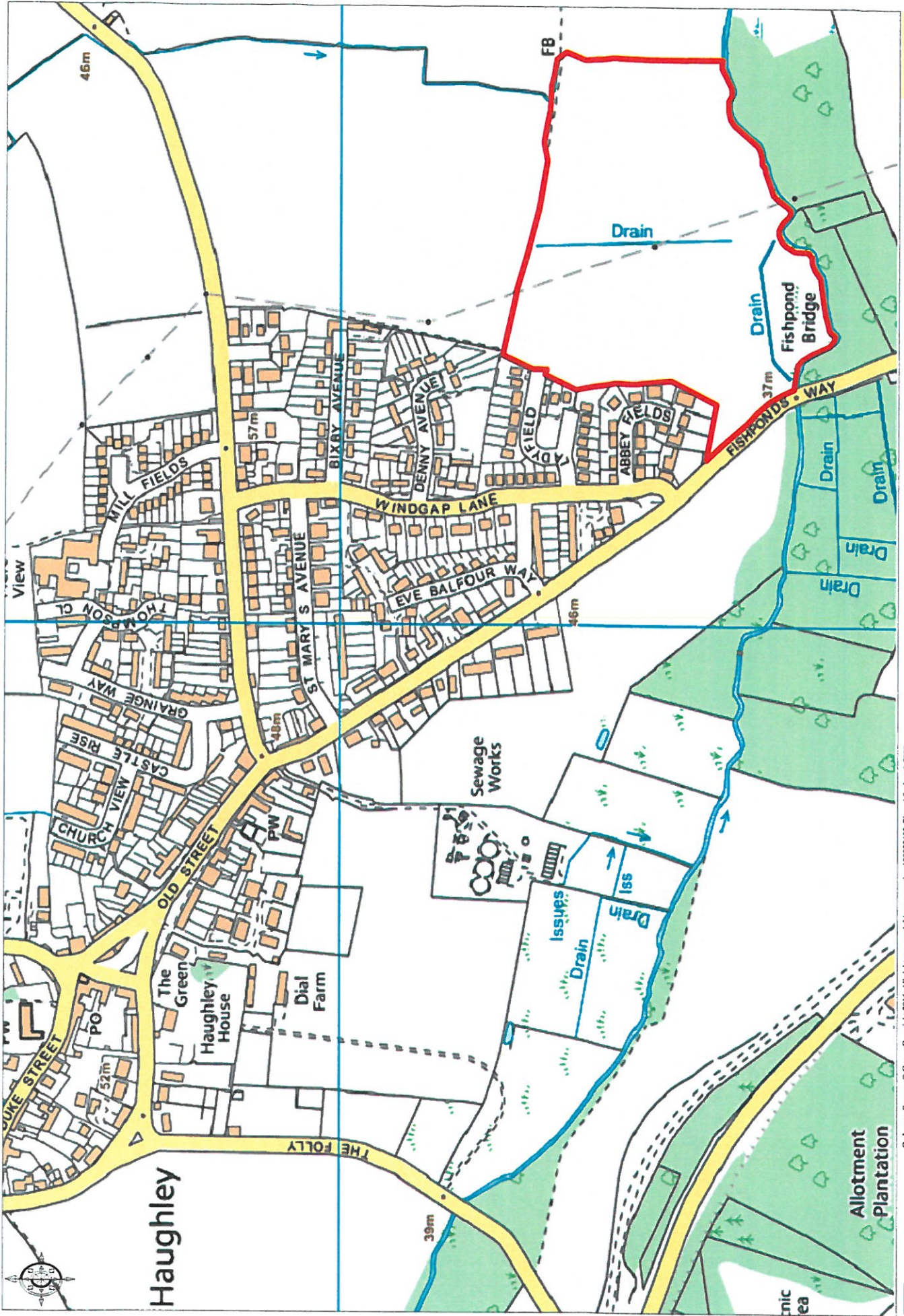
6 Summary

6.1 It is stated at paragraph 11.16 of the Haughley NDP that;

“if further development may be required in the future, site SS0149 should be re-assessed as to its suitability to meet any new housing development need”.

With the increase in the housing requirement locally and in the district, it is submitted that the site should be allocated.

6.2 The Government has recently introduced a standard method for calculating housing need through national planning guidance, based on the 2014 sub-national household projections. When it progresses, the emerging JLP will be required to revisit its housing requirement to accord with the standard methodology. The standard methodology indicates a potential housing need figure of 573 dwellings per annum for Mid Suffolk District (2014-based data), some 121 in excess of their current OAN figure. As such, when the JLP is adopted, the NDP will become out of date in respect of housing need and its relevant policies will be superseded.



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Flood map for planning

Your reference
H NDP

Location (easting/northing)
603358/261640

Created
28 Feb 2019 3:20

Your selected location is in flood zone 1, an area with a low probability of flooding.

This means:

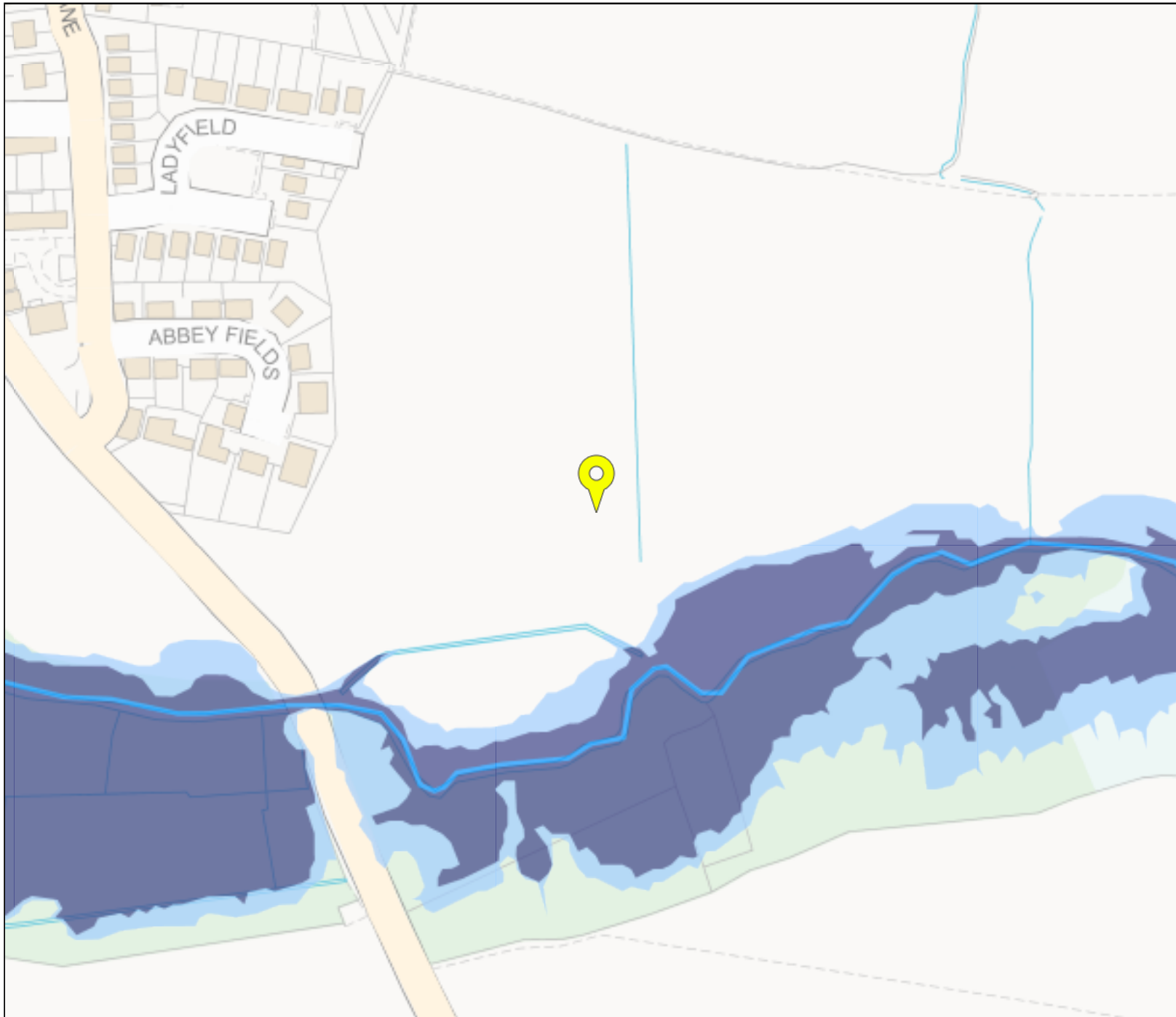
- you don't need to do a flood risk assessment if your development is smaller than 1 hectare and not affected by other sources of flooding
- you may need to do a flood risk assessment if your development is larger than 1 hectare or affected by other sources of flooding or in an area with critical drainage problems

Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

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Flood map for planning

Your reference

H NDP

Location (easting/northing)









603358/261640

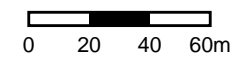
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1:2500

Created

28 Feb 2019 3:20

-  Selected point
-  Flood zone 3
-  Flood zone 3: areas benefitting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area



Haughley Neighbourhood Development Plan

Regulation 16 Consultation

Submission Version



March 2019

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1 INTRODUCTION

1.1 Context

1.1.1 Gladman Developments Ltd (hereafter referred to as "Gladman") specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs.

1.1.2 These representations provide Gladman's response to the current consultation on the submission version of the Haughley Neighbourhood Plan (HNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.

1.1.3 Through these representations, Gladman provides an analysis of the HNP and the policy decisions promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the HNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG¹.

1.1.4 These representations will focus on the following matters:

- Legal compliance;
- National Planning Policy and Guidance; and
- Neighbourhood plan policies

¹ Section ID: 41

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the HNP 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 neighbourhood plan;
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
- c) Having regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
- d) The making of the neighbourhood plan contributes to the achievement of sustainable development;
- e) The making of the neighbourhood plan is in general conformity with the strategic policies contained within the development plan for the area of the authority; and
- f) The making of the neighbourhood plan 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.

2.2 National Planning Policy Framework, & Planning Practice Guidance

National Planning Policy Framework

2.2.1 The new version of the NPPF was published on 24th July 2018, given the transitional arrangements set out at paragraph 214 of the Revised Framework it is on the basis of the previous NPPF (2012 version) that these representations have been drafted.

2.2.1 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it provides guidance on the requirement for the preparation of neighbourhood plans to be in general conformity with the strategic priorities for the wider area and defines the role which neighbourhood plans can play in delivering sustainable development.

2.2.2 At the heart of the Framework, is a "*presumption in favour of sustainable development*" which, as outlined in paragraph 11, should be seen as a golden thread running through both plan-making and decision taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet Objectively Assessed Needs (OAN) for housing, with sufficient flexibility to adapt to rapid change. This requirement is also applicable to neighbourhood plans.

2.2.3 Paragraph 16 of the Framework makes clear that the presumption in favour has implications for how communities engage in neighbourhood planning, stating that neighbourhoods should;

- "Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;
- Plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and
- Identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed. "

2.2.4 Furthermore, paragraph 17 sets out that neighbourhood plans should define a succinct and positive vision for the future of the area and that neighbourhood plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. In addition, neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

2.2.5 Further guidance for groups involved with the production of neighbourhood plans is specified at paragraph 184;

"Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not

promote less development than set out in the Local Plan or undermine its strategic policies.”

Planning Practice Guidance

2.2.6 It is clear from the requirements in the Framework that neighbourhood plan policies should be prepared in general conformity with the strategic requirements for the wider area, as confirmed in an adopted Development Plan. The requirements set out in the Framework are also supplemented by the Government’s suite of Planning Practice Guidance (PPG). In relation to the preparation of the HNP, the PPG on Neighbourhood Planning is of particular relevance.

2.2.7 The PPG also emphasises that;

“...blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence”

2.2.8 With further emphasis that;

“... All settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”²

² Paragraph: 044 Reference ID: 41-044-20160519 (Revised 19/05/2016).

3 DEVELOPMENT PLAN

3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.
- 3.1.2 The adopted development plan relevant to the preparation to the HNP area, and the development plan which the HNP will be tested against is the Mid Suffolk Core Strategy adopted in 2008 and the subsequent Core Strategy Focused Review which was undertaken and adopted by the Council in December 2012.

3.2 Emerging Development Plan

- 3.2.1 Mid Suffolk District Council are working with neighbouring authority Babergh District Council to produce a new Joint Local Plan, having consulted on the Regulation 18 document in 2017. The Parish Council should be mindful of this document as it emerges and draft the policies in the HNP as flexibly as possible to minimise any potential conflicts with the emerging Local Plan. This degree of flexibility is required to ensure that the HNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which 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).'

4 HAUGHLEY NEIGHBOURHOOD PLAN POLICIES

4.1 Context

4.1.1 These representations are made in response to the current consultation on the submission version of the HNP, under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This chapter of the representation highlights the key points that Gladman raise with regard to the content of the HNP as currently proposed.

4.2 Policy HAU1: Haughley's Spatial Strategy

4.2.1 Gladman does not consider the use of settlement boundaries to be appropriate as these will act to preclude appropriately sited and sustainable development opportunities from coming forward to assist in meeting the District's housing needs, in accordance with the presumption in favour of sustainable development. The policy in its current form is considered onerous and is more akin to previous national planning policy which sought to protect the countryside for its own sake. The Framework is clear that development which is sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development. The use of the above policy in its current form will likely stifle the ability of sustainable development opportunities from coming forward and would not accord with the positive approach to growth required by national policy.

4.2.2 Indeed, the PPG is clear that all settlements can play a role in delivering sustainable development, so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence³. Accordingly, Gladman recommend that a more flexible stance to development that is well related to Haughley is taken and the following wording is put forward for consideration:

"When considering development proposals, the Haughley 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 Haughley Neighbourhood Plan will be supported particularly where:

- 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.

³ PPG Paragraph: 001 Reference ID: 50-001-20160519

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

4.2.3 The above wording should be reflected in associated policies contained in the neighbourhood plan.

4.2.4 Furthermore, the supporting text to the policy confirms that the HNP seeks to deliver a ‘maximum’ 150 dwellings over the plan period. Gladman do not consider this approach to be consistent with the requirements of the Framework as it will essentially act to arbitrarily limit the settlements ability to accommodate further growth opportunities. Furthermore, we question how this figure has been derived and whether a housing target figure has been requested by the Local Planning Authority.

4.3 Policy HAU11: Development Design and Character

4.3.1 Whilst Gladman recognise the importance of high-quality design, planning policies and the documents that sit behind them should not be overly prescriptive and need flexibility in order for schemes to respond to site specifics and the character of the local area. There will not be a ‘one size fits all’ approach solution in relation to design and sites should be considered on a case by case basis with consideration given to various design principles. The policy should ensure that high quality and inclusive design is not compromised by aesthetic requirements alone and the policy should not require all of these principles to be adhered to where they are necessary to a development proposal or where they could stifle originality and innovation through unsubstantiated requirements to conform to certain development forms or styles.

4.3.2 Furthermore, we would question how practical it is for an applicant to demonstrate the ability and viability of the development taking place on vacant brownfield sites which would not be in their control and are unlikely to be available for development.

4.4 Policy HAU15: Protection of Rural Landscape

4.4.1 Gladman submit that development can often be delivered in areas without resulting to the loss of openness, landscape character or views considered to be important to the local community. In such circumstances development proposals can be appropriately designed to take into consideration the wider landscape features of the surrounding area.

4.4.2 Gladman raise concerns with regards to the above policy given its ‘protectionist’ stance and question how decision makers will apply this policy in a consistent manner through the development management process. Opinions on landscape are highly subjective, therefore without further clarity about how these views are considered special to the local community, this policy is likely to lead to inconsistencies in the decision-making process. Furthermore, the

exceptional circumstances test is not consistent with the requirements of national policy. The Framework only seeks to prevent development in areas of high national importance (e.g. Green Belt). There is nowhere in the Framework where the exceptional circumstances test relates to development in the open countryside. As such, this policy is inconsistent with the requirements of national policy and is therefore inconsistent with basic conditions (a) and (d).

- 4.4.3 It does not appear that this policy is supported by robust evidence. In this regard, for areas to be considered valued, means that a view would need to have some form of physical attribute that will allow a decision maker to come to the view as to whether these particular locations contain physical attributes that would 'take it out of the ordinary' rather than seeking to protect views of the open countryside for their own sake.

5 CONCLUSIONS

- 5.1.1 Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the HNP must be consistent with national planning policy and guidance. If the plan is found not to meet the Basic Conditions at Examination, then the plan will be unable to progress to referendum.
- 5.1.2 Gladman recommend that the Plan is modified so that it allows for additional flexibility and would not result in preventing sustainable growth opportunities from coming forward or the ability of residents from outside of the parish accessing affordable housing.