

# **Thorndon Neighbourhood Plan 2018 - 2036**

**Report by Independent Examiner to Mid Suffolk  
District Council**

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## Summary and Conclusion

1. The Thorndon Neighbourhood Plan has a clear Vision supported by objectives.
2. The emerging Joint Local Plan identifies the minimum housing requirement for the Thorndon Neighbourhood Plan area as being 55 dwellings. Policy THN 2 provides for around 100 new dwellings, including 55 that already have planning permission and allocations of five sites for approximately 39 dwellings. As residential development on Land West of Hall Road allocated in Policy THN 4 has been subsequently substantially completed, I have recommended the deletion of Policy THN 4 and modification to Policy THN 2 to reflect this.
3. I have recommended the deletion of Policy THN 10 as neighbourhood plans should not be used to apply the national technical space standards.
4. I have recommended the deletion of Policy THN 15. I have no details of the criteria used to select these proposed Buildings of Local Significance, and such criteria are required under national planning guidance.
5. I have recommended modification to some of the other policies in the Plan. In particular, I have recommended that the Kerrison Set Aside Land is deleted from Policy THN 13. Unfortunately it does not meet the criteria for designation as a Local Green Space as it is an extensive tract of land.
6. My reasons with regard to all suggested modifications are set out in detail below. None of these significantly or substantially alters the intention or nature of the Plan.
7. **Whilst I have set out my reasoning under individual policies, my overall conclusion is that, subject to my recommendations, the Plan meets the Basic Conditions. It is appropriate to make the Plan. Subject to my recommendations being accepted, I consider that the Thorndon Neighbourhood Plan will provide a strong practical framework against which decisions on development can be made. I am pleased to recommend that the Thorndon Neighbourhood Plan, as modified by my recommendations, should proceed to Referendum.**

## Introduction

8. On 27 October 2017 Mid Suffolk District Council (MSDC) approved that the Thorndon Parish Neighbourhood Area be designated in accordance with the Neighbourhood Planning (General) Regulations 2012. The Area covers the whole of the parish of Thorndon.
9. The qualifying body is Thorndon Parish Council. The Plan has been prepared by Thorndon Parish Council with the assistance of a working group of volunteers and supported by Places4People Planning Consultancy. The Plan covers the period 2018 to 2036.

10. I was appointed as an independent Examiner for the Thorndon Neighbourhood Plan 2018 to 2036 in July 2020. I confirm that I am independent from the Parish Council and MSDC. I have no interest in any of the land affected by the Plan and I have appropriate experience to undertake this examination. As part of my examination, I have visited the Plan area.

## Legislative Background

11. As an independent Examiner, I am required to determine, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether:
- the policies in the Plan relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
  - the Plan meets the requirements of Section 38B of the 2004 PCPA where the plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area; and
  - that the Plan has been prepared for an area that has been designated under the Localism Act 2011 and has been developed and submitted for examination by a qualifying body.
12. I am obliged to determine whether the Plan complies with the Basic Conditions. The Basic Conditions are:
- 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; and
  - the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations and human rights requirements.
13. *The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018* came into force on 28 December 2018. They state:
- Amendment to the Neighbourhood Planning (General) Regulations 2012.*
- 3.—(1) The Neighbourhood Planning (General) Regulations 2012(5) are amended as follows.*

(2) In Schedule 2 (Habitats), for paragraph 1 substitute:

*“Neighbourhood development plans*

*1. In relation to the examination of neighbourhood development plans the following basic condition is prescribed for the purpose of paragraph 8(2)(g) of Schedule 4B to the 1990 Act(6)—*

*The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(7).”*

14. Since 28 December 2018, a neighbourhood plan is required to be examined against this extra Basic Condition. I will make further reference to this matter under EU Obligations.
15. Subject to the modifications I have recommended in this report, I am content that these requirements have been satisfied.

## **EU Obligations, Strategic Environmental Assessment (SEA) and Habitat Regulation Assessment (HRA)**

16. Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) (EA Regulations) set out various legal requirements and stages in the production of a Strategic Environmental Assessment (SEA).
17. The *Thorndon Parish Council Neighbourhood Development Plan SEA Screening Opinion* was prepared by Land Use Consultants in March 2020. It concludes that the Plan *does not have the potential to have significant environmental effects and that SEA is not therefore required*. The statutory consultees concurred with this conclusion. Based on this Screening Report and consultee responses MSDC prepared a *Strategic Environmental Assessment (SEA) Screening Determination* in May 2020. It states: *In the light of the SEA Screening Report for consultation prepared by Land Use Consultants and the responses to this from the statutory bodies it is determined that the Thorndon Neighbourhood Plan **does not require a Strategic Environmental Assessment in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004.***
18. Based on the screening determination and consultee responses, I consider that it was not necessary for the Plan to require a full SEA Assessment. The SEA screening accords with the provisions of the European Directive 2001/42/EC.
19. As regards HRA, the *Thorndon Neighbourhood Plan 2018-2036: Regulation 14 Draft Habitats Regulations Assessment (HRA): Screening Report* was prepared by Place Services in March 2020. It concludes: *Subject to Natural England’s review, this HRA Screening Report concludes that the Regulation 14 draft Thorndon Neighbourhood Plan is not predicted to have any Likely Significant Effect on any Habitats site, either alone or in combination with*

*other plans and projects. The content of the Thorndon Neighbourhood Plan has therefore been **screened out** for any further assessment and Mid Suffolk DC can demonstrate its compliance with the UK Habitats Regulations 2017.*

20. Natural England concurred with this view. MSDC prepared a *Habitats Regulations Screening Determination* in May 2020. There are two Habitats site which lie within 13 km of Thorndon parish. As the Plan area is not within the Zone of Influence for any of these Habitats Sites, neither are screened in for assessment for any likely significant effect resulting from this draft Plan. The determination concludes: *In the light of the Screening Report prepared by Place Services and the responses from the statutory bodies it is determined that the Thorndon Neighbourhood Plan **does not require** further assessment under the Habitats Regulations 2017.*
21. Based on the screening determination and consultee response, I consider that the Plan does not require a full HRA under Articles 6 or 7 of the Habitats Directive. I am satisfied that the Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(7).
22. A Neighbourhood Plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. I am satisfied that the Plan is compatible with EU obligations and does not breach the European Convention on Human Rights obligations.

## **Policy Background**

23. The *National Planning Policy Framework* (NPPF) (2019) sets out the Government's planning policies for England and how these are expected to be applied. The *Planning Practice Guidance* (2014) (PPG) provides Government guidance on planning policy.
24. At the heart of the NPPF is the presumption in favour of sustainable development. Paragraph 8 sets out the three overarching objectives which are interdependent and need to be pursued in mutually supportive ways. The three overarching objectives are:
  - a) *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
  - b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

25. Thorndon Parish is within the local authority area of Mid Suffolk District Council (MSDC). The development plan for the Thorndon Neighbourhood Plan Area comprises the saved policies in the Mid Suffolk Local Plan (1998); The Mid Suffolk Local Plan First Alteration: Affordable Housing (2006); The Mid Suffolk Core Strategy Development Plan Document (2008); and The Mid Suffolk Core Strategy Focused Review (2012).
26. The strategic policies in the development plan include policies regarding housing provision and the conservation and enhancement of the natural and historic environment.
27. MSDC with Babergh District Council published a new Joint Local Plan Preferred Options Consultation Document in July 2019. This covers the period to 2036. This has been followed by recent consultation on the BMSDC Sustainability Scoping Report (March 2020).

## **The Neighbourhood Plan Preparation**

28. I am required under The Localism Act 2011 to check the consultation process that has led to the production of the Plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.
29. The initial consultation process started in 2016 with a community survey to ascertain local views on the future development of the village. There were regular updates at Parish Council meetings. A community event was held in May 2019 regarding the emerging plan.
30. The Consultation period on the pre-submission draft of the Plan ran from 15 February 2020 to 30 March 2020. A drop in session was publicised via a postcard invitation delivered to each household. The Plan was made available on the Parish Council's website. Paper copies were available from the Community Shop and the TPlus Church Café.
31. I am satisfied that the pre-submission consultation and publicity has met the requirements of Regulation 14 in The Neighbourhood Planning (General) Regulations 2012. It is clear that the qualifying body went to considerable lengths to ensure that local residents were able to engage in the production of the Plan. I congratulate them on their efforts.
32. MSDC publicised the submission Plan for comment during the publicity period between 22 June 2020 and 14 August 2020 in line with Regulation 16 in The Neighbourhood Planning (General) Regulations 2012. A total of nine



responses were received. I am satisfied that all these responses can be assessed without the need for a public hearing.

33. Some responses suggest additions and amendments to policies. My remit is to determine whether the Plan meets the Basic Conditions and other legal requirements. Where I find that policies do meet the Basic Conditions, it is not necessary for me to consider if further suggested additions or amendments are required. Whilst I have not made reference to all the responses in my report, I have taken them into consideration. I gave the Parish Council the opportunity to comment on the Regulation 16 representations. I have taken their comments into consideration. Their comments have been placed on the MSDC web site.

## **The Thorndon Neighbourhood Plan**

34. I have been provided with a detailed evidence base, particularly in the background Village Data supporting document. This has provided a useful and easily accessible source of background information.
35. A clear vision for the Parish has been established with regard to striving to celebrate heritage whilst keeping the village as a thriving rural community. Objectives support the delivery of the vision.
36. Paragraph 16 in the NPPF requires plans to be prepared positively, in a way that is aspirational but deliverable; and serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. In addition, paragraph 16 in the NPPF requires plans to contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.
37. PPG states: *A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.* (Paragraph: 041 Reference ID: 41-041-20140306).
38. Policies in a neighbourhood plan can only be for the development and use of land. I do refer to clarity and precision with regard to some recommendations to modifications to the Plan. Where I do so, I have in mind the need for clear and unambiguous policies, thus ensuring that the Plan has regard to national policy in this respect.
39. It is not for me to re-write the Plan. Where I have found editing errors, I have identified them as minor editing matters and highlighted these as such. These have no bearing on whether the Plan meets the Basic Conditions.

40. For ease of reference, I have used the same policy titles as those in the Plan. I have briefly explained national policy and summarised main strategic policies where relevant to each neighbourhood plan policy. I have tried not to repeat myself. Where I have not specifically referred to other relevant strategic policy, I have considered all strategic policy in my examination of the Plan.

## **Spatial Strategy**

### **Policy THN 1 - Spatial Strategy**

41. Paragraph 78 in the NPPF seeks to ensure that planning policies identify opportunities for villages to grow and thrive. Paragraphs 83 and 84 support a prosperous rural economy.
42. Core Strategy Policy CS1 identifies a settlement hierarchy in Mid Suffolk District. Thorndon is classified as a Secondary Village as being a village unsuitable for growth but capable of taking appropriate residential infill and development for local needs only. In the emerging Joint Local Plan, Thorndon is identified as a Hinterland Village, where development will be permitted within the settlement boundary, subject to a list of criteria.
43. Policy THN 1 identifies a new settlement boundary for Thorndon, within which new development will be focussed. The five sites proposed for new residential development have been included within the settlement boundary and there are other small additions which primarily relate to areas of development. From my observations, I am satisfied that the new settlement boundary will allow for sustainable development in accordance with the strategic settlement hierarchy outlined in the Core Strategy.
44. Core Strategy Policy CS2 restricts development in the countryside to defined categories. Policy THN 1 lists some of these categories and includes development of other undefined exceptional uses. All must show local need. This is not a requirement for agricultural, business and community facilities in national policy. I see no robust evidence to justify restricting development in the countryside in this Parish to a greater degree than the restriction on development in the countryside in the rest of the District. Therefore, I recommend modification to Policy THN 1 to ensure regard to national policy and conformity with strategic policy. I have suggested revised wording to the policy and supporting text.
45. Subject to the above modifications, Policy THN 1 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. As such, modified Policy THN 1 meets the Basic Conditions.
46. **Recommendation: to meet the Basic Conditions, I recommend:**

#### **1) modification to Policy THN 1 to read as follows:**

#### **Policy THN 1 – Spatial Strategy**

**The Neighbourhood Plan area will accommodate development commensurate with Thorndon’s designation as a Secondary Village in the adopted Core Strategy and emerging designation as a Hinterland Village in the Joint Local Plan.**

**The focus for new development will be within the Settlement Boundary, as defined on the Policies Map.**

**Proposals for development located outside the Settlement Boundary will only be permitted where they accord with national and strategic policies.**

**2) modification to paragraph 5.4 by the deletion of the second sentence.**

## Housing

### Policy THN 2 - Housing Development

47. Emerging Policy SP04 in the Joint Local Plan sets out the housing spatial distribution for the district from 2018 to 2036. Table 4 identifies the minimum housing requirement for the Thorndon Neighbourhood Plan area as being 55 dwellings. This includes outstanding planning permissions granted as at 1 April 2018.
48. There is no legal requirement to test the Neighbourhood Plan against emerging policy, but as stated in PPG, *the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.*
49. Background evidence supporting Policy THN 2 explains that at 1 April 2018 there were 55 planning permissions for new dwellings. Therefore, in accordance with emerging policy, there is no need to allocate additional sites in the Plan to meet emerging minimal requirements. Nevertheless, the local community has supported the addition of a low rate of new housing to support the development of a few additional services and to ensure that existing services remain viable. As such, Policy THN 2 provides for around 100 new dwellings, including the 55 that already have planning permission and allocations of five further sites. Two of these sites have residential planning permissions granted in 2019. Policies THN 3 - THN 7 allocate these five sites for approximately 39 dwellings. The remainder of the dwellings are anticipated to be either on windfall or infill sites, dwellings demonstrating exceptional need to be located in the countryside and the conversion of redundant or disused agricultural barns in the countryside.

50. At my visit to the Parish, it was clear that events have overtaken the Plan preparation. I am referring to the dwellings that are being constructed on the site on Land West of Hall Road and appear to be near to completion. Therefore, in the interest of clarity, I am recommending that Policy THN 4 should be deleted. In the interest of clarity, I suggest that the first paragraph of Policy THN 2 refers to the completions on this site and that criterion ii no longer refers to this site.
51. Sustainable development allows for sustainable growth. As such, I am satisfied that this approach in the Plan to providing such a scale of new residential development in the Parish would contribute towards sustainable development. I have one reservation regarding residential development outside the settlement boundary.
52. The NPPF allows for a wider range of dwellings in the countryside beyond those listed in criterion iv Policy THN 2. In particular, paragraph 79 in NPPF allows for dwellings where the design is of exceptional quality. As referred to above, Core Strategy Policy CS2 restricts development in the countryside to defined categories. The residential categories are not as restrictive as those in Policy THN 2. I have no evidence to justify the restrictions outlined in criterion iv in Policy THN 2. Thus, to have regard to national policy and to be in general conformity with strategic policy, I have suggested revised wording for criterion iv.
53. Subject to the above modifications, Policy THN 2 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. As such, modified Policy THN 2 meets the Basic Conditions.
54. **Recommendation: to meet the Basic Conditions, I recommend**
- 1) modification to the first paragraph in Policy THN 2 to read as follows:**
- This Plan provides for around 100 additional dwellings to be developed in the Neighbourhood Plan area between 2018 and 2036. This includes the three dwellings constructed on Land to the West of Hall Road. The remaining additional growth will be met through:**
- 2) modification to criterion ii in Policy THN 2 to delete reference to the site on Land West of Hall Road.**
- 3) modification to criterion iv in Policy THN 2 to read as follows:**
- iv dwellings outside the settlement boundary in accordance with national and strategic policies.**

### **Housing Allocations**

55. At the heart of the NPPF is the presumption in favour of sustainable development. As mentioned under Policy THN 2, I am satisfied that the approach in the Plan to providing such a scale of new residential

development in the Parish would contribute towards sustainable development.

56. Core Strategy Focused review Policy FC 1.1 requires development proposals to demonstrate the principles of sustainable development. Proposals must conserve and enhance the local character.
57. In the context of contributing towards sustainable development, I have the following observations for each of the allocated sites.

### **Policy THN 3 - Land at the Kerrison Centre**

58. The site at the Kerrison Centre has the benefit of outline planning permission with a requirement for the provision of seven affordable dwellings. Policy THN 3 seeks to ensure that the development is in keeping with the surrounding area, continues to protect existing protected trees and provides access to the adjacent Local Green Space. As such, Policy THN 3 contributes towards sustainable development, has regard to national policy and is in general conformity with strategic policy. Policy THN 3 meets the Basic Conditions.

### **Policy THN 4 - Land west of Hall Road**

59. This site has the benefit of planning permission for two no. two- storey five bedroom dwellings and a three bedroom bungalow. Policy THN 4 allocates the site for three dwellings. As mentioned under Policy THN 2, dwellings are being constructed on the site and appear to be near to completion. Therefore, in the interest of clarity, Policy THN 4 should be deleted.
60. The relevant sections of the supporting text in paragraphs 6.10 – 6.12 can be retained. It may be more appropriate to transfer them to the beginning of Section 6. Paragraphs 6.6 - 6.7 will also need to be modified accordingly. **I see these as minor editing matters.**
61. **Recommendation: to meet the Basic Conditions, I recommend the deletion of Policy THN 4.**

### **Policy THN 5 - Land at Brambledown south of Stoke Road**

### **Policy THN 6 - Land North of, and surrounding, 37 The Street**

### **Policy THN 7 - Land East of Fen View**

62. I have considered all three of these sites together as they raise the same issues.
63. AECOM has prepared a *Site Options and Assessment* for eight potential residential sites using a traffic light rating. The assessment has been prepared using recognised methodology.

*Policy THN 5 - Land at Brambledown south of Stoke Road*

64. This site scored a traffic light green in the *Site Options and Assessment*. Policy THN 5 allocates this site for up to four dwellings with at least two of them being small dwellings with a maximum of two bedrooms

*Policy THN 6 - Land North of, and surrounding, 37 The Street*

65. This site scored a traffic light green in the *Site Options and Assessment*. Policy THN 6 allocates this site for up to six dwellings with at least three of them being small dwellings with a maximum of two bedrooms.

*Policy THN 7 - Land East of Fen View*

66. This site was not subject to analysis in the *Site Options and Assessment* as together with a larger area it was considered as a potentially suitable residential site as part of a call for sites undertaken by MSDC.
67. Policy THN 7 allocates this site for up to six dwellings with at least three of them being small dwellings with a maximum of two bedrooms.
68. I note the proximity to the listed building, Post Mill Roundhouse. However, it is proposed to retain the existing hedgerow, which I consider would help to ensure that development can be designed to preserve the significance of this heritage asset.
69. Paragraph 6.20 refers to the 'Posthouse' Roundhouse. From the listings in Appendix 1, this should read 'Post Mill' Roundhouse. **I see this as a minor editing matter.**
70. The following comments are relevant to Policies THN 5, THN 6 and THN 7.
71. As a general principle, to ensure contribution towards sustainable development, any number of dwellings proposed on a site that does not already have the benefit of planning permission should not generally be restricted in a policy. Therefore, I recommend that the number of dwellings proposed is expressed as 'approximately'.
72. The results of the Community Survey in 2016 indicate a need for small houses in the Parish, which supports the approach to house size in Policies THN 5, THN 6 and THN 7. In addition, I note that The Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment update (January 2019) identified that the highest need across Mid Suffolk was for two-bedroomed homes (34% of the requirement).
73. Development is not permitted to commence until 2026. The reason given is the number of homes with an existing planning permission that have yet to be completed together with a need to ensure an organic rate of growth of the plan period. I have visited the Parish and seen for myself the character and appearance of the village.
74. It is usual for the market to dictate when sites should come forward for development. However, I recognise concerns that the pace of development

could overwhelm the community. On this basis, I am happy to accept that the phasing of development would contribute towards sustainable development. In doing so, I recommend an addition to these policies to allow for an earlier release should there be a strategic need for these additional dwellings. Not only would this contribute towards sustainable development, it would also ensure that should the emerging Joint Local Plan require these houses to satisfy further housing allocations for the Parish, alternative sites would not have to be found.

75. Subject to the above modifications, Policies THN 5, THN 6 and THN 7 have regard to national policy, contribute towards sustainable development and are in general conformity with strategic policy. Modified Policies THN 5, THN 6 and THN 7 meet the Basic Conditions.
76. **Recommendation: To meet the Basic Conditions, I recommend modification to Policies THN 5, THN 6 and THN 7 by the addition of ‘approximately’ prior to the number of dwellings. I recommend the following is added to the end of the last sentence of each of these policies: ‘unless there is a clear strategic need for additional dwellings before then’.**

#### **Policy THN 8 - Affordable Housing on Rural exception Sites**

77. Paragraph 77 in the NPPF states: *In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.*
78. Core Strategy Policy CS2 seeks to restrict development in the countryside other than in defined categories including affordable housing on exception sites.
79. Policy THN 8 supports affordable housing schemes on rural exception sites, with an emphasis on there being a local proven need and local connection criteria for the affordable housing. A small number of market houses can be included in exceptional circumstances.
80. Policy THN 8 has regard to national policy for the supply of homes, contributes towards sustainable development, particularly the social objective, and is in general conformity with strategic policy. Policy THN 8 meets the Basic Conditions.
81. Policy THN 8 refers to settlement ‘boundaries’ in the first sentence. There is only one settlement boundary and thus the policy should be revised accordingly. **I see this as a minor editing matter.**

### **Policy THN 9 - Housing Mix**

82. Paragraph 59 in the NPPF states that the needs of groups with specific housing requirements need to be addressed, to support the Government's objective of significantly boosting the supply of homes.
83. Core Strategy Policy CS9 seeks to ensure a mix of housing types, sizes and affordability to cater for different accommodation needs.
84. Policy THN 9 requires new housing developments of ten or more dwellings to provide at least 34% of two-bedroom homes. This percentage corresponds to the findings of The Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment update (January 2019), where it identified that the highest need across Mid Suffolk was for two-bedroomed homes (34% of the requirement). In Policy THN 9 exceptions to this requirement relate to tenure or latest housing needs.
85. Policy THN 9 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Policy THN 9 meets the Basic Conditions.

### **Policy THN 10 - Measures for New Housing Development**

86. PPG, (at Paragraph: 001 Reference ID: 56-001-20150327), makes it clear through a link to a Written Ministerial Statement of 25 March 2015 that it is not appropriate to refer to any additional local technical standards or requirements relating to the construction or performance of new dwellings in neighbourhood plans and it clearly states that neighbourhood plans should not be used to apply the national technical standards.
87. Policy THN 10 requires all new dwellings to achieve internal space in accordance with Nationally Described Space Standards. This is contrary to the national planning guidance referred to above and thus should be deleted.
88. The second paragraph in Policy THN 10 is also in Policy THN 18. In the interest of clarity, it is not necessary to repeat the same policy requirement in the Plan.
89. For the above reasons, I recommend the deletion of Policy THN 10
90. **Recommendation: To meet the Basic Conditions, I recommend the deletion of Policy THN 10.**

## **Natural Environment**

### **Policy THN 11 - Area of Local Landscape Sensitivity**

91. The NPPF, in Paragraph 170 requires the planning system to contribute to and enhance the natural and local environment; including protecting and enhancing valued landscapes.



92. Core Strategy Policy CS5 seeks to protect and conserve landscape quality, taking into account the natural environment and the historic dimension of the landscape as a whole.
93. Policy THN 11 identifies an Area of Local Landscape Sensitivity following an assessment in The Special Landscape Area Assessment (April 2020). The area is an extension of the existing Special Landscape Area, which is not proposed to be carried forward into the Joint Local Plan. The new boundary includes all set aside land and the extent of the distinguishable river valley within the Parish. The Assessment provides robust justification for this approach.
94. Policy THN 11 has regard to national policy where it seeks to protect valued landscapes, contributes towards sustainable development, particularly the environmental objective and is in general conformity with strategic policy. Policy THN 11 meets the Basic Conditions.

### **Policy THN 12 - Dark Skies**

95. Paragraph 180 in the NPPF seeks to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.
96. Core Strategy Policy CS4 refers to the need for development to avoid causing light pollution wherever possible.
97. Policy THN 12 seeks to minimise light pollution in this rural parish to avoid a detrimental impact on the rural character of the village. In doing so, it seeks to ensure highway safety and the safety of residents.
98. Policy THN 12 has regard to national policy, contributes towards sustainable development, particularly the environmental objective and is in general conformity with strategic policy. Policy THN 12 meets the Basic Conditions.

### **Policy THN 13 - Local Green Spaces**

99. The NPPF in paragraphs 99 - 101 states: *the designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.*

*The Local Green Space designation should only be used where the green space is:*

- a) *in reasonably close proximity to the community it serves;*

*b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*

*c) local in character and is not an extensive tract of land.*

*Policies for managing development within a Local Green Space should be consistent with those for Green Belts.*

100. The background evidence in the *Thorndon Neighbourhood Plan Local Green Space Assessment* (January 2020) is a helpful evidence base for the designation of the proposed Local Green Spaces (LGS). I have visited the Parish and seen the proposed LGS. My comments on each site are set out below. They meet the criteria for designation unless I have specifically mentioned otherwise.
101. 1 Kerrison Playing Field. This site is demonstrably special to the local community, particularly for its recreational value. It is on the edge of the village close to the community it serves. It is local in character and not an extensive tract of land.
102. 2 Fen View Play Area and Open Space. This site includes a children's play area and open space. This site is demonstrably special to the local community, particularly for its recreational value. It is on the edge of the village close to the community it serves. It is local in character and not an extensive tract of land.
103. 3 Kerrison Set Aside Land. This site is demonstrably special to the local community, particularly for its recreational value. Indeed, it was being well used as an informal recreation area at the time of my visit. I am satisfied that it is in reasonably close proximity to the community it serves and is local in character. However, whilst it is contained to a considerable extent by hedgerows, it is an extensive tract of land. Therefore, it does not meet the criteria for designation as a LGS and thus should be deleted from Policy THN 13 and from the Policies Maps.
104. 4 All Saints' Churchyard. The churchyard clearly meets the criteria for designation as a LGS. It is demonstrably special to the local community, particularly for its tranquillity. It is at the heart of the village, is local in character and not an extensive tract of land.
105. 5 The Bowling Green. This site is demonstrably special to the local community, particularly for its recreational value. It is situated within the village close to the community it serves. It is local in character and not an extensive tract of land.
106. Subject to the deletion of the Kerrison Set Aside Land from designation as a LGS, Policy THN 13 has regard to national policy, contributes towards sustainable development, particularly the environmental objective and is in general conformity with strategic policy. Modified Policy THN 13 meets the Basic Conditions

107. Paragraph 7.9 refers to telecommunications equipment being allowed in LGS. It should be made clear that this is only equipment of the scale allowed under permitted development rights. Larger equipment may need prior approval or planning permission in the usual way. **I see this as a minor editing matter.**
108. **Recommendation: to meet the Basic Conditions, I recommend the deletion of the Kerrison Set Aside Land from LGS designation in Policy THN 13 and on the Policies Maps.**

#### **Policy THN 14 - Biodiversity**

109. The NPPF, in Paragraph 170 requires the planning system to contribute to and enhance the natural and local environment. This includes protecting and enhancing valued landscapes and minimising impacts on biodiversity and providing net gains in biodiversity where possible. One of the principles to protect and enhance biodiversity in Paragraph 175 states: *if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.*
110. Core Strategy Policy CS5 requires all development to maintain and enhance the environment and retain local distinctiveness.
111. Policy THN 14 seeks to protect natural features and supports a net gain in biodiversity. It recognises the need for mitigation where losses or harm are unavoidable.
112. The first sentence in Policy THN 14 refers to avoiding the loss of or substantial harm to natural features except in exceptional circumstances. These circumstances are not defined, making interpretation of the policy difficult.
113. The first sentence in Policy THN 14 refers to important trees. Apart from mention of trees subject to a Tree Preservation Order, I have no evidence before me to identify important trees in the Parish.
114. Policy THN 14 states that where losses or harm are unavoidable, the benefits of the development must clearly outweigh any impacts. In Paragraph 175 b) in the NPPF, this test is only relevant for development on land within or outside a Site of Special Scientific Interest. I have no evidence before me to indicate why this test should be relevant for all losses or harm to biodiversity features in the Parish.
115. Policy THN 14 refers to onsite mitigation as part of the design concept and layout of a development scheme. However, in a number of instances it may be preferable for there to be off site mitigation and therefore a requirement for onsite mitigation cannot always be justified.

116. If I were to recommend modification to Policy THN 14 with regard to loss of biodiversity and mitigation, it would merely be a repetition of national policy and would add no local policy detail. Therefore, I recommend deletion of the first section of the policy, apart from protection of a 10 metre buffer to the River Dove, which has been recommended by the Environment Agency.
117. Subject to the above modification, Policy THN 14 has regard to national policy, contributes towards sustainable development, particularly the environment objective and is in general conformity with strategic policy. Modified Policy THN 14 meets the Basic Conditions.
118. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy THN 14 to read as follows:**

**Policy THN 14 – Biodiversity**

**Development within 10 metres of the River Dove will not be supported.**

**Where new access is created, or an existing access is widened through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity.**

**Development proposals will be supported where they provide a net gain in biodiversity through, for example,**

- a) the creation of new natural habitats including ponds;**
- b) the planting of additional trees and hedgerows (reflecting the character of Thorndon’s traditional hedgerows), and;**
- c) restoring and repairing fragmented biodiversity networks.**

## **Built Environment and Design**

### **Policy THN 15 - Buildings of Local Significance**

119. PPG states:

*There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.*

*Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers. This includes information on the criteria used to select non-designated heritage assets and information about the location of existing assets.*

(Extract part of Paragraph: 040 Reference ID: 18a-040-20190723 dated 23 July 2019).

120. Policy THN 15 identifies buildings of local significance to be treated as non-designated heritage assets. Their importance to the local community is described in Appendix 2 to the Plan. However, I have no details on the criteria used to select these buildings, which is required under national planning guidance. Thus, without such information, I recommend deletion of Policy THN 15.
121. Usually there is supporting evidence compiled using criteria for selection such as that advised by Historic England in *the Historic England Advice Note 7: Local Heritage Listing*. I did seek clarification as to whether there were any public documents explaining the criteria for selection and it appears that there are none. All is not lost. Paragraph 8.2 refers to pursuing registration of the identified buildings with MSDC. This can continue. Paragraphs 8.1 – 8.3 and Appendix 2 can remain in the Plan.
122. **Recommendation: to meet the Basic Conditions, I recommend the deletion of Policy THN 15.**

### **Policy THN 16 - Heritage Assets**

123. The NPPF advises at paragraph 193 that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This paragraph is in Section 16 of the NPPF which differentiates between consideration of potential substantial harm, total loss, or less than substantial harm, to the significance of heritage assets.
124. Core Strategy Policy CS5 seeks to ensure that all development maintains and enhances the environment, including the historic environment, and retains the local distinctiveness of the area. Core Strategy Focused review Policy FC1.1 seeks to ensure that proposals for development conserve and enhance the local character of different parts of the district. These policies are relevant to the following Policies THN 16 – THN 18.
125. Policy THN 16 seeks to ensure the conservation and enhancement of the village's heritage assets. This policy appears to have been copied from elsewhere. There is no conservation area in the Parish. Therefore, reference to the conservation area in criteria a. and b. should be deleted.
126. As the NPPF makes a distinction between designated and non-designated heritage assets and as I have recommended the deletion of Policy THN 15 with regard to non-designated heritage assets, the Policy should make it clear that it only refers to designated heritage assets.
127. Criterion d. refers to design being in line with the AECOM Design Guidelines for Thorndon. Guidelines are not policy. Therefore, 'regard' should be had to the Guidelines. In the interest of clarity, these design guidelines should be given their full title.

128. Criteria e. and f. are unnecessary as they are largely repeated in the two paragraphs below. To have regard to the NPPF and particularly in the interest of clarity, the penultimate paragraph should be strengthened to distinguish between substantial harm and less than substantial harm to the significance of the heritage assets. MSDC has suggested such an addition.
129. Subject to the modifications suggested above, Policy THN 16 has regard to national policy, contributes towards sustainable development, particularly the environmental objective and is in general conformity with strategic policy. Modified Policy THN 16 meets the Basic Conditions.
130. **Recommendation: To meet the Basic Conditions I recommend modification to Policy THN 16 to read as follows:**

**Policy THN 16 – Heritage Assets**

**To ensure the conservation and enhancement of the village’s designated heritage assets, proposals must:**

- a. preserve or enhance the significance of the designated heritage assets of the village, their setting and the wider built environment;**
- b. contribute to the village’s local distinctiveness, built form and scale of its heritage assets, as described in the AECOM Thorndon Design Guidelines (April 2019), through the use of appropriate design and materials; and**
- c. be of an appropriate scale, form, height, massing, alignment and detailed design which respects the area’s character, appearance and its setting, having regard to the AECOM Thorndon Design Guidelines (April 2019).**

**Proposals will not be supported where any harm, less than substantial or substantial harm, or total loss of significance of a designated heritage asset, caused as a result of the impact of a proposed scheme, is not outweighed by the public benefits that would be provided.**

**Where a planning proposal affects a designated heritage asset, it must be accompanied by a Heritage Statement identifying, as a minimum, the significance of the asset, and an assessment of the impact of the proposal on the designated heritage assets. The level of detail of the Heritage Statement should be proportionate to the importance of the asset, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting.**

**Policy THN 17 - Thorndon Special Character Area**

131. Paragraph 124 in the NPPF emphasises that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve.

132. Policy THN 17 identifies the area around the church, primary school and Manor Farm as a Special Character Area. I have visited the area and seen for myself how this area is an important focal point in the village. Policy THN 17 requires development proposals to give consideration to enhancing the distinct characteristics of this area.
133. Policy THN 17 has regard to national policy, contributes towards sustainable development, particularly the environmental objective and is in general conformity with strategic policy. Policy THN 17 meets the Basic Conditions.

### **Policy THN 18 - Design Considerations**

134. Paragraph 124 in the NPPF explains that *good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.*
135. Paragraph 125 in the NPPF states: *plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.*
136. Paragraph 127 in the NPPF lists criteria for design policies, including that *developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).*
137. Policy THN 18 seeks a high quality safe and sustainable environment. The details in this policy are primarily justified by the comprehensive AECOM Design Guidelines.
138. In the interest of clarity and precision, I have suggested revised wording for the first sentence and for criterion c. In addition, I have suggested revised wording for the second sentence to ensure that regard is had to the Design Guidelines and Checklist. In the Design Guidelines, paragraph 3.2.15 should be deleted as having previously mentioned, national guidance clearly indicates that it is not appropriate to refer to any additional local technical standards or requirements relating to the construction or performance of new dwellings in neighbourhood plans. In the interest of clarity, these design guidelines should be given their full title in Policy THN 18.
139. I have recommended the removal of the word 'important' from criteria c. and d.ii. as these areas are not clearly defined. In criterion d.i. I have deleted

reference to the Buildings of Local Significance to accord with my recommendations for Policy THN 15.

140. Criterion d.iii refers to important views. These are evaluated in the background evidence document *Appraisal of Views* (January 2020). I have visited these viewpoints and understand their importance to the local community. In the interest of clarity, the Important Views should be numbered on the Policies Map to correspond with the numbering in this supporting document. **I see this as a minor editing matter.**
141. Criterion e. should be deleted as it repeats criterion d.v. Criterion i. should replace 'where necessary' with 'unless inappropriate' to have regard to national policy for sustainable drainage systems.
142. Suffolk County Council has raised concern regarding the requirement for parking within the plot. I have seen for myself the current highway situation and understand the concerns of the local community with regard to the narrowness of much of the public highway. As such, I consider that the requirement in criterion g. has regard to national policy where within the context of promoting sustainable transport it seeks to ensure a safe, secure and attractive environment. As such, I see no need to alter criterion g. to meet the Basic Conditions.
143. The Development Design Checklist in Appendix 3 should delete reference to a conservation area. **I see this as a minor editing matter.**
144. Subject to the modifications I have suggested above, Policy THN 18 has regard to national policy, contributes towards sustainable development, particularly the environmental objective and is in general conformity with strategic policy. Modified Policy THN 18 meets the Basic Conditions.
145. **Recommendation: to meet the Basic Conditions, I recommend**
- 1) the deletion of paragraph 3.2.15 in the Thorndon Design Guidelines. (April 2019)**
  - 2) modification to Policy THN 18 to read as follows:**

#### **Policy THN 18 – Design Considerations**

**Proposals for new development must reflect the local character in the Neighbourhood Plan area and create and contribute to a high quality, safe and sustainable environment.**

**Planning applications should, as appropriate to the proposal, demonstrate how they have had regard to the Development Design Checklist in Appendix 3 of this Plan and to the AECOM Thorndon Design Guidelines (April 2019).**

**In addition, proposals will also be supported where they:**



- a. recognise and address the key features, characteristics, landscape/building character, local distinctiveness and special qualities of the area and/or building and, where necessary, prepare a landscape character appraisal to demonstrate this;
- b. maintain or create the village's sense of place and/or local character avoiding, where possible, cul-de-sac developments which do not reflect the lane hierarchy and form of the settlement;
- c. do not involve the loss of gardens, and open, green or landscaped areas, which make a positive contribution to the character and appearance of that part of the village;
- d. taking mitigation measures into account, do not affect adversely:
  - i. any historic character, architectural or archaeological heritage assets of the site and its surroundings;
  - ii. landscape characteristics including trees and ancient hedgerows and other prominent topographical features as identified in the AECOM Thorndon Design Guidelines (April 2019);
  - iii. key features of identified important views into, out of, or within the village as identified on the Policies Map;
  - iv. sites, habitats, species and features of ecological interest;
  - v. the amenities of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated; and/or residential amenity;
- e. produce designs that respect the character, scale and density of the locality;
- f. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that all vehicle parking is provided within the plot and seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement;
- g. wherever possible ensure that development faces on to existing lanes, retaining the rural character and creates cross streets or new back streets in keeping with the settlement's hierarchy of routes;
- h. not result in water run-off that would add-to or create surface water flooding; and incorporate, unless inappropriate, the use of above ground open Sustainable Drainage Systems;
- i. where appropriate, make adequate provision for the covered storage of all wheelie bins and for cycle storage in accordance with adopted cycle parking standards.
- j. include suitable ducting capable of accepting fibre to enable superfast broadband;
- k. provide one electric vehicle charging point per new off-street parking place created; and
- l. protect and where possible enhance Public Rights of Way networks.

## Policy THN 19 - Sustainable Construction Practices

146. Paragraph 148 in the NPPF states: *the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.*
147. Core Strategy Policy CS3 seeks to reduce contributions to climate change.
148. As mentioned under Policy THN 10, national guidance clearly indicates that it is not appropriate to refer to any additional local technical standards or requirements relating to the construction or performance of new dwellings in neighbourhood plans. Therefore, Policy THN 19 can only apply to non - residential development. I suggest that Policy THN 19 is modified accordingly.
149. The accompanying text can explain that it is not appropriate to refer to any additional local technical standards or requirements relating to the construction or performance of new dwellings in neighbourhood plans. **I see this as a minor editing matter.**
150. Subject to the above modification, modified Policy THN 19 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Modified Policy THN 19 meets the Basic Conditions.
151. Criterion c. is a repetition of criterion a. and thus criterion c. should be deleted. **I see this as a minor editing matter.**
152. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy THN 19 by the addition of the following sentence at the beginning of the policy:**
- This policy only applies to non - residential development.**

## Services and Facilities

### Policy THN 20 - Protecting existing services and facilities.

153. Paragraph 92 in the NPPF states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should, amongst other matters, plan positively for the provision of community facilities and guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.
154. Core Strategy Policy CS6 seeks to ensure that new development provides or supports the delivery of appropriate and accessible infrastructure to meet the

justified needs of new development. Whilst not a policy specifically supporting the retention of existing facilities, the supporting text does refer to seeking to ensure the protection of existing facilities and services.

155. Policy THN 20 seeks to protect existing services and facilities and specifically identifies four worthy of protection. This has regard to national policy, contributes towards sustainable development, particularly the social role, and is in general conformity with strategic policy. Policy THN 20 meets the Basic Conditions.

## **Referendum and the Thorndon Neighbourhood Plan Area**

156. I am required to make one of the following recommendations:
- the Plan should proceed to Referendum, on the basis that it meets all legal requirements; or
  - the Plan as modified by my recommendations should proceed to Referendum; or
  - the Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.
157. **I am pleased to recommend that the Thorndon Neighbourhood Plan as modified by my recommendations should proceed to Referendum.**
158. I am required to consider whether or not the Referendum Area should extend beyond the Thorndon Neighbourhood Plan Area. I see no reason to alter or extend the Neighbourhood Plan Area for the purpose of holding a referendum.

## **Minor Modifications**

159. The Plan is a well-written document, which is easy to read. Where I have found errors, I have identified them above. It is not for me to re-write the Plan. If other minor amendments are required as a result of my proposed modifications, I see these as minor editing matters which can be dealt with as minor modifications to the Plan. In particular, paragraphs 1.5 and 1.6 will need updating. Paragraphs 1.15 and 1.16 need modification as there are five, rather than four themes in the Plan, yet only four of the themes include planning policies.

**Janet Cheesley**

**Date 21 September 2020**

## Appendix 1 Background Documents

The background documents include:

The National Planning Policy Framework (The Framework) (2019)  
The Planning and Compulsory Purchase Act 2004  
The Localism Act (2011)  
The Neighbourhood Planning (General) Regulations (2012)  
The Neighbourhood Planning (General) (Amendment) Regulations (2015)  
The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations (2016)  
The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations (2017)  
The Neighbourhood Planning Act (2017)  
The Planning Practice Guidance (2014)  
The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018  
The Saved Policies in the Mid Suffolk Local Plan (1998)  
The Mid Suffolk Local Plan First Alteration: Affordable Housing (2006)  
The Mid Suffolk Core Strategy Development Plan Document (2008)  
The Mid Suffolk Core Strategy Focused Review (2012)  
Babergh & Mid Suffolk Joint Local Plan: Preferred Options Consultation Document (July 2019)  
The Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment update (January 2019)  
Regulation 16 Representations  
All Supporting Documentation submitted with the Plan  
Thorndon Neighbourhood Development Plan Site Options and Assessment (April 2019)  
Babergh and Mid Suffolk Joint Local Plan: Strategic Housing and Economic Land Availability Assessment (SHELAA) Draft (August 2017)  
Thorndon Extract from MSDC Draft SHELAA (July 2019)  
MSDC Housing Allocations Policy (April 2019)  
Planning Application details Refs: DC/19/01310 and DC/19/03680  
Examination Correspondence (On the MSDC web site)