

Babergh District Council



Boxford Neighbourhood Development Plan

Submission Consultation Responses

In January 2022, Boxford Parish Council (the 'qualifying body') submitted their Neighbourhood Development Plan to Babergh District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

The consultation period ran from Monday 7 March until 4:00pm on Friday 29 April 2022.

A total of 17 organisations / individuals submitted written representations before the consultation deadline. They are listed below, and copies of their representation are attached.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Babergh District Council
(3)	Natural England
(4)	Suffolk Wildlife Trust
(5)	Historic England
(6)	Defence Infrastructure Organisation, obo the MOD
(7)	Water Management Alliance
(8)	Marine Management Organisation
(9)	Catesby Estates Ltd
(10)	Boyer Planning (obo Vistry Group)
(11)	Resident - Bishop
(12)	Resident - Carpenter
(13)	Resident - Gold
(14)	Resident - Gray
(15)	Resident - Gregg
(16)	Resident - Vosvenieks
(17)	Resident - Green

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(1) SUFFOLK COUNTY COUNCIL

Date: 21 April 2022
Enquiries to: Georgia Teague
Tel: [REDACTED]
Email: [REDACTED]
neighbourhoodplanning@suffolk.gov.uk



Babergh District Council
Endeavour House,
8 Russell Road,
Ipswich
IP1 2BX

Dear Mr Hobbs & Mr Bryant,

Submission Consultation version of the Boxford Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Boxford Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- 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) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) 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)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Where amendments to the plan are suggested added text will be in italics and deleted text will be in strikethrough.

Health and Wellbeing

During the Reg14 consultation, SCC welcomed the reference to M4(2) and M4(3) in the supporting text and recommended that Policy BOX2 should state specific support for homes that are built to these standards, which are adaptable and accessible in order to meet the needs of a range of tenants over a lifetime.

SCC notes that there is an emphasis placed on bungalows as the accommodation for an ageing population, however there are more options available to meet the needs of an increasingly frail

population and/or those with restricted mobility. As the neighbourhood plan states that 26.6% of the residents are aged 65 or older (which is above the Suffolk average), this is a significant need to meet the needs of ageing population.

The consultation statement from the parish in response has referred to the Ministerial Statement.

Whilst SCC acknowledges that the Ministerial Statement 2015 referenced in the Consultation Statement states that neighbourhood plans should not set additional technical standards; SCC was not proposing that the plan should impose a requirement for M4(2). SCC recommended that the plan set out a positive position towards proposals which contain homes built to those standards, in the same way that the neighbourhood plan supports bungalows in Policy BOX2. This will help the plan meet the needs of a wider range of groups including older and vulnerable people, reflecting paragraph 61 of the NPPF.

Following guidance from footnote 46 in the NPPF "Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties."

As such, the following text is recommended to be included in Policy BOX 2 Housing Mix, to reiterate what is raised paragraph 7.32 of the plan:

"Support will be given for smaller 2 and 3 bedroomed homes that are adaptable and accessible (meaning built to optional M4(2) and M4(3) standards), in order to meet the needs of the aging population, without excluding the needs of the younger buyers and families."

We have no further comments to make at this stage. We wish to remain updated on the progress of this plan.

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

Yours sincerely,

Georgia Teague
Planning Officer
Growth, Highways, and Infrastructure

(2) BABERGH DISTRICT COUNCIL

Our ref: Boxford NP R16
Date: 29 April 2022

FAO: Janet Cheesley (Independent Examiner)
Fwd to: Boxford NP Steering Group / Andrea Long

Dear Janet,

- 1. Boxford Neighbourhood Plan: Reg 16 Submission Draft consultation**
- 2. Comments / observations from Babergh District Council**

This letter has been sent for and on behalf of Robert Hobbs (Corporate Manager for Strategic Planning).

The Council welcomes the changes made to the Boxford Neighbourhood Plan (the 'Plan') in response to our Regulation 14 comments. In implementing these and other changes, some minor editing matters persist which relate to matters of cross-referencing etc. We therefore feel obliged to record those noted by us so that they can be corrected. We also make observations only in relation to policies BOX2 and BOX3. Taken as a whole, none of these detract from what comes across as a well thought through Plan.

Section 3: National and Local Context

- We note the updated text (e.g. paragraph 3.5) which helpfully explains the current situation regarding our emerging Joint Local Plan.

Section 7: Housing

- In Table 2, the approval date for DC/20/04286 should read 12.01.21 (not 21.01.21).
- Paragraph 7.35 should refer to 'Annex 2 of the NPPF (2021)'.
- We welcome clarification on the approach to tenure mix (BOX 2 and supporting text). In our Regulation 14 response we included a note of caution around the 'Rent to Buy' product which, for now, still presents some delivery challenges, in that it can be difficult to find a Registered Provider offering security of tenure to the satisfaction of the Housing Authority. However, this should not detract from the policies aims.

Cont./



Babergh and Mid District Councils
Endeavour House, 8 Russell Road, Ipswich IP1 2BX
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www.babergh.gov.uk www.midsuffolk.gov.uk

- Policies BOX 2 and BOX 3 both refer to the Council's Lettings Policy. To avoid any local misunderstanding we feel it appropriate to point out that, in line with the Council's policy and in the context of Policy BOX 2 (i.e., affordable housing secured on market-led schemes via planning obligations), this will be interpreted as meaning a local connection to the District and, in the context of Policy BOX 3, which specifically refers to Rural Exception Site housing, it will be interpreted as meaning a local connection in the first instance to the parish of Boxford.

Most affordable housing is to meet the needs of the whole district. Rural exception sites are to meet an exceptional local need, and so are allocated accordingly.

Section 8: Transport Strategy for Boxford

- We note that Maps 8 and 9 have been swapped around to improve sequencing. The cross-references to these within Policy BOX 4 have also been updated but those in paragraphs 8.9 and 8.11 have been overlooked.
- Paragraph 8.23 should refer to 'Policies BOX1 and BOX1A.'
- To avoid confusion with Policy BOX 6, we suggest that the 'Transport Strategy Projects' on page 56 are not shown in a blue shaded / bordered text box.

Chapter 9: Built and Historic Environment

- In paragraph 9.13, we suggest this read 'stock bricks' (not stocks bricks).
- Policy BOX 7. We suggest that the first use of the word 'soft' is deleted from criterion k). [This approach would be consistent with, for example, the similarly re-worded criteria in the Redgrave Neighbourhood Plan]
- Policy BOX 10 could helpfully refer to 'Maps 11a and 11b' below.
- Para' 10.11 cross-refers to Policy BOX 9. We believe this should read 'Policy BOX 10'
- The Key to Map 13 and the main Policies Map (Appendix E) still refer to 'Protected Landscape Views'. Policy BOX 12 calls these 'Important Public Scenic Views'. To be consistent we ask that the Key to Map 13 etc. also use the latter description.

Chapter 12: Community Infrastructure

- Amend the cross-reference at the end of paragraph 12.11 to refer to policy BOX 15.

We trust that our comments are helpful.

Yours sincerely

Paul Bryant
 Neighbourhood Planning Officer
 Babergh & Mid Suffolk District Councils
 T: 01449 724771 / 07860 829547
 E: communityplanning@baberghmidsuffolk.gov.uk

(3) NATURAL ENGLAND

Date: 14 March 2022
Our ref: 385568
Your ref: Boxford Neighbourhood Plan



Dear Mr Bryant
Babergh & Mid Suffolk District Councils
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

Reg' 16 Neighbourhood Planning (General) Regulations 2012 (as amended) - The Boxford Neighbourhood Plan 2018 - 2037

Thank you for your consultation on the above dated 03 March 2022

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 faithfully

Joanne Widgery
Consultations Team

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

Natural environment information sources

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

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

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

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

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

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

Natural environment issues to consider

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

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

¹ <http://magic.defra.gov.uk/>

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

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

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

⁵ <http://magic.defra.gov.uk/>

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

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

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

Landscape

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

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

Wildlife habitats

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

Priority and protected species

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

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

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

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

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

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

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

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

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

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

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

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



(4) SUFFOLK WILDLIFE TRUST

Suffolk Wildlife Trust

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IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org



communityplanning@baberghmidsuffolk.gov.uk

By email only

29th April 2022

Dear Mr Paul Bryant,

RE: Boxford DRAFT Neighbourhood Plan

Thank you for sending us details of the Boxford DRAFT Neighbourhood Plan, please see our comments below:

We are pleased to see that the Boxford Neighbourhood Plan recognises the importance of biodiversity and proposes measures to protect and enhance it within Policy BOX 13: Protection and Enhancement of natural features. Paragraph 10.17 demonstrates the high importance local residents place on the rural landscape of the parish. Considering how the rural landscape of the parish depends on the protection of wildlife habitats such as hedgerows and grasslands, we recommend strengthening protection for species and habitats in the parish within the plan text and policies.

Firstly, the plan text mentions Primrose Wood, part of The Goodlands County Wildlife Site (CWS), which is designated due to its mosaic of habitats including wet woodland and species-rich fen meadow, which are of county level importance. The River Box Meadows CWS also lies within the parish of Boxford and is identified on the Natural England Priority Habitat Inventory as Coastal and Floodplain Grazing Marsh, with a range of plant and bird species identified on site within the CWS citation, including snipe and ragged robin. We recommend adding these two key wildlife sites to the plan text as well as including the protection of County Wildlife Sites within Policy BOX 13.

Furthermore, these two CWSs form part of a wildlife corridor which stretches along the River Box linking areas of local green spaces, such as Stone St Pasture and Primrose Wood. This wildlife corridor is a key feature of the parish, contributing to the rural character of the parish as well as being an important ecological asset. This wildlife corridor along the River Box should be given more focus within the plan text and Policy Box 13, in order to highlight its importance within the parish as well as target future Biodiversity Net Gain to enhancing and buffering habitats within this wildlife corridor.

In order to strengthen protection for key habitats and species within the parishes, reference to biodiversity net gain, safeguarding protected species and Priority Species as listed within The Natural Environment and Rural Communities (NERC) Act 2006 from future development, should be mentioned in Policy BOX 13: Protection and Enhancement of natural features. We also recommend naming the key Priority Species for the parish to ensure strengthened protection, as well as targeting biodiversity net gain in the parish towards these key species. For example, barn owl, water vole, European eel and

brown trout have been recorded in the parish associated with the River Box and biodiversity net gain could be targeted to help conserve key species such as these within the parish.

The new Environment Act 2021 requires development proposals to achieve a 10% net gain in biodiversity; whilst not yet required in law, this level is already being implemented as good practice across the country. Therefore, we recommend that the Boxford Neighbourhood Plan should require a minimum of 10% biodiversity net gain. The Wildlife Trusts, as well as other organisations, are advocating for 20% biodiversity net gain where this is possible and setting an aspiration for achieving a higher percentage of net gain could help to ensure that wildlife and the rural character of the parish are conserved for future generations. Suffolk County Council's recent commitment to 'deliver twice the biodiversity net gain required'¹, suggests that is reasonable to include this aspiration within the Boxford Neighbourhood Plan.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Ellen Shailes
Ecology and Planning Adviser

¹ <https://www.suffolk.gov.uk/council-and-democracy/council-news/show/councils-commitment-to-further-enhancing-suffolks-natural-environment>

(5) HISTORIC ENGLAND



Historic England

Mr Paul Bryant
Babergh & Mid Suffolk District Councils
Endeavor House
8 Russell Road
Ipswich
Suffolk
IP7 6SJ

Direct Dial: [REDACTED]

Our ref: PL00471299

25 April 2022

Dear Mr Bryant

Ref: **Boxford Neighbourhood Plan Regulation 16 Consultation**

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on <mailto:eastplanningpolicy@historicengland.org.uk> if and when the Neighbourhood Plan is made by the 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 plan, 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

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HistoricEngland.org.uk



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(6) DEFENCE INFRASTRUCTURE ORGANISATION obo MOD



Ministry
of Defence

Boxford NP Consultation
c/o Planning Policy Team
Babergh and Mid Suffolk District Councils
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Ipswich, IP1 2BX

Defence
Infrastructure
Organisation

Safeguarding Department
Statutory & Offshore
Defence Infrastructure Organisation
St Georges House
DIO Head Office
DMS Whittington
Lichfield
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WS14 9PY

Tel: [REDACTED]

E-mail: DIO-safeguarding-statutory@mod.gov.uk
www.mod.uk/DIO

25TH April 2022

Your Ref: Babergh District Council- Boxford Neighbourhood Plan Regulation 16

DIO Ref: 10054622

Dear Sir/Madam

It is understood that Babergh District Council are undertaking a consultation regarding their Boxford Neighbourhood Plan under Regulation 16. This document will guide the future development of the parish.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) accordance with the provisions of that Direction.

Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

Having reviewed the supporting documentation in respect of Boxford Neighbourhood Plan under Regulation 16, the MOD have an area of interest in RAF Wattisham.

The Civil Parish authority area of Boxford encompasses areas within the Statutory Aerodrome Height and Birdstrike Safeguarding Zones surrounding the aerodrome. RAF Wattisham lies approximately 11.7km North-East of the Civil Parish authority area of Boxford.

The Aerodrome Height safeguarding zone serves to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre. This airspace needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely.

Additionally, within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, such as green and/or brown roofs/roof gardens on flat roof buildings, as well as the creation of new waterbodies. Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, and associated bioretention swales, tree pits and mini wetlands provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.

In addition, where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. An example of this type of development is the installation of wind turbine generators. The Government's online Planning Practice Guidance contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more. The MOD has, in principle, no objection to any renewable energy development though some infrastructure enabling renewable energy production, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace surrounding military aerodromes, or impede the operation of safeguarded defence technical installations. In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations potentially resulting in detriment to aviation safety and operational capability.

In summary, the MOD would wish to be consulted within the Boxford Neighbourhood Plan of any potential development within the statutory technical safeguarding zones that surround RAF Wattisham which consists of structures or buildings exceeding statutory safeguarding technical criteria, or any development which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

C Waldron

Chris Waldron
DIO Assistant Safeguarding Manager

(7) WATER MANAGEMENT ALLIANCE

E from: Planning Department <Planning@wlma.org.uk>

Rec'd: 3 March 2022

Subject: Re: Consultation on Reg 16 Boxford N'hood Plan (Babergh DC)

Your Ref: Boxford NP Reg 16 Consultation

Good Afternoon,

Thank you for your consultation on the Boxford Neighbourhood Plan 2018-2037. Having screened the plan, the site in question lies outside the Internal Drainage District of the East Suffolk Internal Drainage Board as well as the Board's wider watershed catchment, therefore the Board has no comments to make.

Kind Regards,
Charlie



Charlie Howe (Bsc)

Sustainable Development Officer

Water Management Alliance

m: 07909 098143 e: Charlie.howe@wma.org.uk

Registered office: Kettlewell House, Austin Fields Industrial Estate, King's Lynn, Norfolk, PE30 1PH

t: 01553 819600 | e: info@wlma.org.uk | www.wlma.org.uk

WMA members: [Broads Drainage Board](#), [East Suffolk Drainage Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [South Holland Drainage Board](#), [Waveney, Lower Yare and Lothingland IDB](#) in association with [Pevensey and Cuckmere Water Level Management Board](#).

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(8) MARINE MANAGEMENT ORGANISATION

E from: Lucinda Robinson, Marine Management Organisation
Rec'd: 28 April 2022
Subject: Consultation on Reg 16 Boxford N'hood Plan (Babergh DC)

Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Marine Management Organisation Functions

The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

Marine Planning and Local Plan development

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the [Coastal Concordat](#). This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.

Under Section 58(3) of [Marine and Coastal Access Act \(MCAA\) 2009](#) all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK [Marine Policy Statement](#). This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service: soundness self-assessment checklist](#). We have also produced a [guidance note](#) aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our [gov.uk page](#).

See [this map on our website to locate](#) the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our [Explore Marine Plans](#) online digital service.

The adoption of the [North East](#), [North West](#), [South East](#), and [South West Marine Plans](#) in 2021 follows the adoption of the [East Marine Plans](#) in 2014 and the [South Marine Plans](#) in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.

Marine Licensing and consultation requests below MHWS

Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a [marine licence](#) in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. We have produced a [guidance note](#) (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: marine.consents@marinemanagement.org.uk.

Consultation requests for development above MHWS

If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:

- The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the [Planning and Compulsory Purchase Act 2004](#). Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.
- It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.
- If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.

Minerals and Waste Local Plans and Local Aggregate Assessments

If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:

- The [Marine Policy Statement \(MPS\)](#), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry.
- The [National Planning Policy Framework \(NPPF\)](#), which sets out policies for national (England) construction mineral supply.
- [The minerals planning practice guidance](#) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- [The national and regional guidelines for aggregates provision in England 2005-2020](#) predict likely aggregate demand over this period, including marine supply.

The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies

(delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response, please email us at consultations@marinemanagement.org.uk or telephone us on 0208 0265 325.

Lucinda Robinson, MSc (She/Her) | Marine Planner | Marine Management Organisation

+ [Nobel House | 17 Smith Square | London | SW1P 3JR]

8 lucinda.robinson@marinemanagement.org.uk | ([02087200083] | [07464522334])

Do you want to tell us what you think of the Marine Plans? Then we'd appreciate your views through our voluntary [North East](#), [North West](#), [East](#), [South](#), [South East](#) or [South West](#) monitoring survey.

To receive marine planning updates and our newsletter enter your details [here](#).

Our MMO Values: Together we are **Accountable**, **Innovative**, **Engaging** and **Inclusive**

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(9) CATESBY ESTATES plc

For Office use only:

Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	Mr Edward Barrett
Job Title (if applicable):	Associate Director, Planning
Organisation / Company (if applicable):	Catesby Estates plc
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E-mail:	edb@catesbyestates.co.uk

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

Section Two: Your representation(s)

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

Paragraph No.	7.5	Policy No.	BOX 1, BOX 1A
---------------	-----	------------	---------------

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

Support		Oppose	<input checked="" type="checkbox"/>
Support with modifications		Have Comments	

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

We write in response to the Reg 16 consultation on the Boxford Neighbourhood Development Plan.

Context

In January 2020 Catesby Estates submitted an outline planning application to Babergh District Council for the development of up to 64 dwellings and the provision of land for a community building on land east of Sand Hill, Boxford (application reference [DC/20/00330](#)) (Location Plan enclosed).

Outline planning permission was granted for the development on 11 December 2020 but was subsequently quashed on 26 March 2021 following a High Court challenge brought by Boxford Parish Council. The application was returned to Babergh planning committee meeting on 19 May 2021 (recommended for approval) but was deferred for further consideration of offsite highway matters and at the time of writing remains to be redetermined.

We have submitted representations to each stage of the Boxford Neighbourhood Plan. Whilst we are supportive of the Neighbourhood Planning process, we have serious concerns regarding the Reg 16 Boxford Neighbourhood Plan; principally its failure to appropriately identify and meet the housing needs of the village and its overly restrictive approach to future growth and development - contrary to the approach set out in the NPPF. As set out below it fails several of the Basic Conditions.

Housing Requirement

The housing requirement figure (13 dwellings) adopted by the Reg 16 Neighbourhood Plan is stated (at para 7.5) as being taken from the emerging Babergh and Mid Suffolk Joint Local Plan. This is not a justified approach reflecting that the Joint Local Plan Policy (SP04) identifying housing requirements for the Neighbourhood Plan areas has been deleted following examination.

The modifications to the Joint Local Plan have significant implications for the Boxford Neighbourhood Plan and include:

- Deletion of *Policy SP04 - Housing Spatial Distribution* (this policy identified minimum housing requirements for the designated Neighbourhood Plan Areas, including the figure of 13 homes for Boxford).

- Deletion of the *LS01 and LA* housing allocation policies (including the allocation for 5 dwellings at Calais Street, Boxford which is incorporated into the Neighbourhood Plan).
- Retention of the settlement boundaries in the current (as opposed to proposed) policies map.
- Significant modification to *Policy SP03* to make clear that outside defined settlement boundaries development will be permitted in circumstances specified in the NPPF¹;
- Requirement for the preparation of a “Part 2” Joint Local Plan which will distribute housing growth in accordance with the Settlement Hierarchy and identify new allocations to meet the remaining housing requirement to 2037 in accordance with that hierarchy.

In essence the Joint Local Plan will become a “Part 1” Local Plan, to be followed by the preparation and adoption of a “Part 2” Local Plan. The “Part 2” plan will amongst other matters include consequent housing requirement figures for Neighbourhood Plan areas.

Put simply, there is now no minimum housing requirement for the Boxford Neighbourhood Plan to meet. It is too early to say what the housing requirement will be, or whether Part 2 of the Joint Local Plan will amend the settlement boundary or allocate sites for housing in Boxford.

Chronologically the Neighbourhood Plan Steering Group will have been aware of the modifications to the Joint Local Plan prior to publishing the Reg 16 Neighbourhood Plan. Considering this significant change in circumstance, publication of the Reg 16 Neighbourhood Plan should have been paused to reconsider the housing requirement figure and its origin.

In light of the modifications to the Joint Local Plan, the Neighbourhood Plan Steering Group do not know what the current housing need for Boxford is. They have taken no steps to enquire of the Council or instruct external advice on what that up-to-date housing need figure would be.

In the absence of guidance from the Joint Local Plan, we consider that the enclosed Local Housing Needs Assessment (Lichfields December 2019) commissioned by Catesby Estates and the Boxford Housing Need Assessment (Aecom September 2020) represent the most up to date assessments of local housing need for the Boxford Neighbourhood Plan. Critically both assessments identify a housing need significantly higher than that proposed in the Reg 16 Boxford Neighbourhood Plan.

The Boxford Housing Need Assessment (Aecom September 2020) prepared in support of the Neighbourhood Plan confirms the need for 28 affordable properties in Boxford over the Neighbourhood Plan period. National Planning Practice Guidance is clear that evidence of this nature should be taken into consideration when determining a Neighbourhood Plan’s development requirements (paragraph: 101 reference ID: 41-101-20190509).

The Neighbourhood Plan’s proposed approach to housing delivery in Boxford (a sustainable Core Village) will not deliver any affordable housing. This approach is at clear odds with Objective 1 set out in the Vision Chapter (05) of the Neighbourhood Plan which aims: “*To provide for housing growth of all tenures and sizes to meet the needs of the current and future generations*”. It is also at odds with paragraph 1.10 of the Site Options Assessment Report (Aecom August 2021) which states:

¹ The Councils suggested amendments to Policy SP03 following discussion at the Matter 4 Preliminary Hearing Session held on 21 July 2021 included the following wording “*Outside of the defined boundaries, in-isolated-locations development will only be permitted in exceptional circumstances specified in national policy*”

“The Neighbourhood Plan group is proposing to exceed the Local Plan requirement and is also keen to explore ways to take steps towards meeting the demand for Affordable Housing identified in its Housing Needs Assessment which is approximately 28 homes” (own emphasis)

Contrary to the above statement, the Reg 16 Neighbourhood Plan will not meet the demand for affordable housing identified in the Boxford Housing Needs Assessment (Aecom September 2020). The consequence of the Neighbourhood Plan’s approach to housing will be an ever-increasing need for affordable housing, worsening housing affordability and an out migration leading to the decline of the settlement and its services and facilities over time. The proposed approach does not represent a sustainable development strategy. It fails Basic Condition (d) (achievement of sustainable development).

In addition to the Boxford Housing Needs Assessment (Aecom September 2020), Catesby Estates commissioned an assessment of local housing need for Boxford and its functional cluster in support of the outline planning application for the land east of Sand Hill. The Lichfields assessment was undertaken in the context of the adopted Babergh Core Strategy (2014) which represents the adopted strategic guidance for the Boxford Neighbourhood Plan. The assessment follows the same methodology accepted by the Secretary of State in the Long Melford appeal decision (reference: APP/D3505/W/18/3214377). The conclusions of the Lichfields assessment were also endorsed by Babergh Council in the approval of the outline application for 64 dwellings on land east of Sand Hill, Boxford (application reference DC/20/00330) in December 2020. NB neither consideration of the Lichfields assessment or the issue of local housing need were cited as reasons for the quashing of the outline planning permission.

The enclosed assessment undertaken by Lichfields demonstrates that just within the Boxford part cluster, the housing need to 2031 is a minimum of 90 dwellings. As the Core Village at the centre of a functional cluster, at the very least Boxford should be meeting most (if not all) of the needs arising within the hinterland villages and countryside which do not overlap into other clusters (i.e. Edwardstone and Groton).

In summary the Regulation 16 Boxford Neighbourhood Plan does not identify an up-to-date housing figure or have regard to the most up-to-date evidence. It fails Basic Condition (a) (regard to national policies and advice contained in the Secretary of State guidance).

Development Outside Settlement Boundaries

Outside the settlement boundaries, NP Policy BOX1 only permits development where it is for affordable housing, the conversion of an existing building, agriculture, horticulture, forestry or outdoor recreation.

This approach is not in accordance with the NPPF which is very clear that development can take place in the countryside. NPPF Paragraph 85 states:

“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist” (own emphasis).

Furthermore, it is an established principle that a constraint policy (such as a settlement boundary) should not be imposed until the level of housing need within the plan period has been confirmed (as is the case in Boxford). The approach in Policy BOX1 fails Basic Condition (a) i.e.

it plainly has not had regard to national planning policy and it would not be appropriate to make a plan with this kind of constraint policy, in advance of identifying the local housing need for the Neighbourhood Plan area. Modifications to the policy are required to ensure it has regard to the approach set out in the NPPF.

Policy BOX 1A: Housing Allocation for 7 dwellings and new car park at Stone Street

Policy BOX 1A seeks to allocate land east of Stone Street for 7 dwellings and a new car park. The site lies within the designated conservation area, forming part of a largely open strip of land between the village and Stone Street hamlet. Policy BOX 1A requires development proposals to provide a detailed heritage statement *“which addresses the issues of historic connections between the core of the village and the countryside and how this has been eroded”*. Furthermore, any application is expected to *“include full details of how the development would safeguard the setting of the Conservation Area.”*

In the absence of any assessment of the potential impact of the allocation on the conservation area, we disagree with the Strategic Environmental Assessment (SEA’s) conclusion that no significant effects are anticipated on the historic environment. In the absence of a Heritage Assessment there is insufficient evidence to demonstrate that this allocation can be suitably delivered in a way which contributes towards achieving sustainable development and that any impacts on the historic environment can be suitably mitigated. In this regard the Reg 16 Neighbourhood Plan fails Basic Condition (a) (regard to national policies and advice contained in the Secretary of State guidance). A Heritage Assessment should be prepared to consider the impact of the allocation on the conservation area.

What improvements or modifications would you suggest?

Reference to the now deleted Joint Local Plan minimum neighbourhood plan area housing requirement should be removed. The Reg 16 Neighbourhood Plan must then be revised to identify an appropriate housing need figure based on up-to-date evidence.

The third paragraph of Policy BOX1 should be amended to read: *“Proposals for development located outside the Settlement Boundary will only be permitted where they are in accordance with national and district level policies”* With this modification, the policy will have regard to the NPPF’s objective of significantly boosting the supply of homes commensurate with the village’s status as a Core Village.

In addition, the settlement boundaries shown in the policies maps (based on the now deleted settlement boundaries shown in the Joint Local Plan) should be redrawn accordingly.

A Heritage Assessment should be prepared to consider the heritage impacts of the proposed allocation for 7 dwellings and a new car park on land at Stone Street.

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.

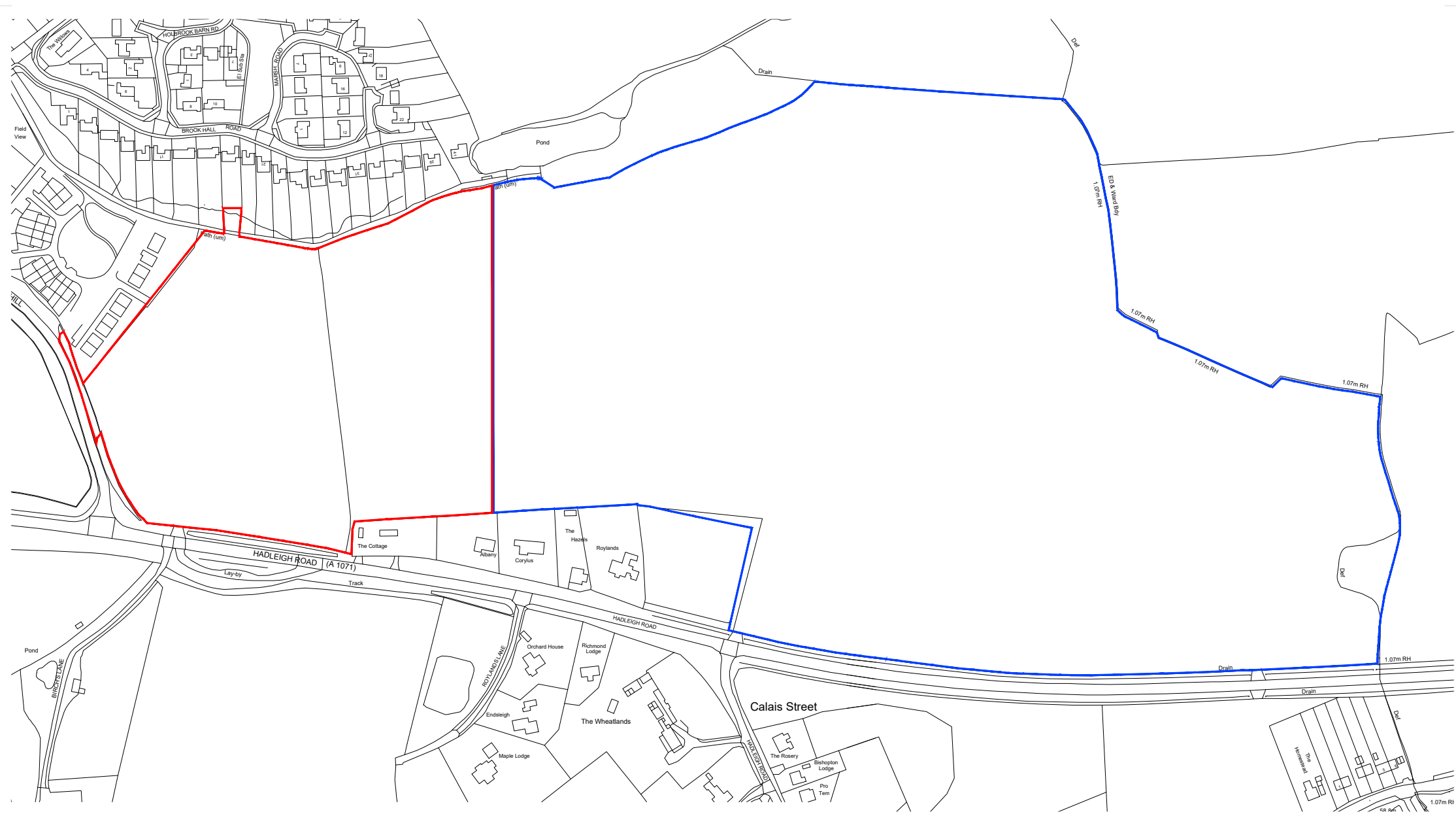
I consider that a hearing should be held because ...

A focussed examination hearing would enable a structured discussion of the issues raised in this representation to take place. Such a discussion is needed due to the critical issues raised in this submission.

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

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the Boxford NDP by Babergh District Council	<input checked="" type="checkbox"/>

Signed: 	Dated: 28/04/2022
--	--------------------------



- Legend**
- Site Boundary
 - Additional Land Within Ownership

0 25m 50m

Rev:	Date:	Description:	Initial:

Sand Hill, Boxford	
Drawing	
09 - Site Location Plan	
Scale: 1:1250 @ A1	Drawn: AKP
Date: 21/01/2020	Checked: AKP

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**Land to the east of Sand Hill,
Boxford**

**Local Housing Needs
Assessment**

Catesby Development Land Ltd

December 2019

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1.0 Introduction

- 1.1 This report has been prepared by Lichfields on behalf of Catesby Development Land Ltd in the context of an outline planning application for the erection of up to 64 no. dwellings at Land to the East of Sand Hill, Boxford, Suffolk. It sets out a local housing needs assessment for Boxford and the relevant area to respond to the Babergh Core Strategy requirement for proposals in Core Villages to address the issue of local housing need.
- 1.2 An ‘Affordable Housing Statement’ has been prepared on behalf of Catesby by Tetlow King; it reviews wider context around affordable housing need and current levels of affordable housing need and delivery across Babergh. Such analysis is therefore not repeated within this report, which focuses specifically on the overall quantum of local housing need in Boxford, and whether there is an overall shortfall which the proposed development can help to address.

Background

Babergh Core Strategy (2014)

- 1.3 The Babergh Core Strategy 2011-31 was adopted in February 2014 and covers the period 2011-31. Policy CS2 sets out the Settlement Pattern Policy:
- “The development strategy for Babergh is planned to a time horizon of 2031. Most new development (including employment, housing, retail, etc) in Babergh will be directed sequentially to the towns/urbans areas, and to the Core Villages and Hinterland Villages identified below. In all cases the scale and location of development will depend upon the local housing need, the role of settlement as employment providers and retail/service centres and the capacity of existing physical and social infrastructure to meet forecast demands and the provision of new/enhanced infrastructure, as well as having regard to environmental constraints and the views of local communities expressed in parish/community/neighbourhood plans.” (emphasis added)*
- 1.4 The district is divided into ‘Functional Clusters’ (“clusters”) which centre around a town/urban area or Core Village and incorporate the surrounding Hinterland Villages and Countryside (see Map 4 of Babergh Core Strategy). The settlements at the centre of the clusters provide a range of day to day services serving the need of their residents and those in the cluster and some Hinterland Villages and rural areas overlap into multiple clusters. The Core Strategy defines the functional clusters within Babergh and states that:
- “The ‘functional clusters’ are groups of villages which share common links between them. The larger villages (called Core Villages) provide services and facilities for their own residents and for those that live in smaller villages and rural settlements in a hinterland around them (often overlapping). The villages in catchment areas of these Core Villages we have called Hinterland Villages. The clusters have been identified through local responses to the Growth Review, rather than being identified by the Council. These clusters reflect the way that people may live in one part of the cluster but use other places within it for essential, low-order, everyday services and facilities (such as schools, convenience shops or primary healthcare). One of the most important benefits of the functional clusters approach is that it allows for inter-changeability in service provision, the location of new development (such as how or where rural affordable housing developments are provided and occupation rights shared, where new employment provision is made or recreational facilities provided for a general area).” (Core Strategy Executive Summary para 3)*

- 1.5 Policy CS2 defines the towns/urbans areas as Sudbury and Great Cornard, Hadleigh and Babergh Ipswich Fringe (edge of urban area). Boxford is defined as a Core Village; with regard to the Core Villages serving functional clusters, Policy CS2 states:

“Core Villages will act as a focus for development within their functional cluster and, where appropriate, site allocations to meet housing and employment needs will be made in the Site Allocations document.”

- 1.6 Policy CS3 of the Core Strategy sets out the strategy for growth and development. It states that overall provision will be made for 5,975 homes in Babergh between 2011-31. This is equivalent to an annual rate of 299 per annum, however CS3 states that this requirement will be 1,100 for the 2011-16 period and 4,875 for the 2017-31 period. This equates to annual rates of 220 and 325 dwellings per annum (dpa) in each of the periods respectively. In addition to existing commitments and windfalls, the Core Strategy makes provision for 2,500 dwellings in Sudbury and Great Cornard (850 dwellings), Hadleigh (250 dwellings), Ipswich fringe (350 dwellings) and 1,050 dwellings in Core and Hinterland Villages.

- 1.7 Policy CS11 set out the Council’s strategy for development for Core and Hinterland Villages, including matters to be addressed through development proposals. In the case of Core Villages, one of the criteria relates to local housing need:

“...iv) locally identified need – housing and employment, and specific local needs such as affordable housing...” (Policy CS11, Core Strategy)

Caselaw – East Bergholt Parish Council v Babergh District Council v Paul Bernard Aggett, Sarah Jane Aggett [2016] EWHC 3400 (Admin) December 2016

- 1.8 The case at East Bergholt concerned a proposed development for 10 single-storey dwellings for over-55s on a site in East Bergholt (a Core Village within Babergh). The District Council granted planning permission in March 2016, which East Bergholt Parish Council subsequently challenged. The Parish Council contended that the District Council had misapplied its own Core Strategy policies because evidence of local need had not been addressed, as required by Policy CS11. The District Council contended that ‘locally identified need’ constituted the needs of Babergh District (but not those of areas, such as Ipswich, outside the District boundary). The judgment confirms that in the context of Policy CS11, ‘local’ could not be interpreted to mean ‘district’:

*“...local housing need in Policy CS11 means housing need in the village and its cluster, and perhaps in areas immediately adjoining it” (para 23). (*emphasis added*)*

Supplementary Planning Documents (SPDs)

- 1.9 In 2014 the Council adopted the Rural Development and Core Strategy Policy CS11 Supplementary Planning Document (“the SPD”). In relation to the local need criteria set out in Policy CS11, the SPD states:

“Developers should therefore set out how the proposal meets these locally identified needs. This should include an analysis of the number and types of dwelling in the village, an assessment the need for housing in the village and the identification of any gaps in provision. Proposals should provide affordable housing in accordance with Policy CS19. Proposals should therefore be accompanied by a statement that analyses the local housing, employment and community needs of the village and how they have been taken into account in the proposal. It is anticipated that such statements should be prepared in consultation with the Council using evidence from a number of sources.” (SPD para 14)

- 1.10 Whilst the SPD anticipates that statements of local need should be prepared in consultation with the Council, there is no requirement for this within the Core Strategy.

Emerging policy

- 1.11 In July 2019 Babergh and Mid Suffolk Councils published a second Reg 18 iteration of a new Joint Local Plan (“the emerging plan”). The emerging plan (Policy SP01) states that in Babergh provision will be made for a minimum of 7,560 homes (420 per annum) over the 2018-36 plan period. Policy SP04 of the emerging plan sets out the spatial distribution which totals 9,343 homes, which is again stated as a minimum.
- 1.12 Unlike in the current Core Strategy, the emerging Local Plan does not include any criteria related to local housing need regarding proposals for residential development. Policy SP03 of the emerging Plan (part d) set out the criteria for development proposals in Hinterland and Hamlet villages, which include design, landscaping and cumulative impact, but there is no reference to local need.
- 1.13 The emerging Local Plan therefore acknowledges that there is an increase in housing need compared to the current level set out in the Core Strategy, referring to all housing need/supply figures as minimums. It also removes the requirement for development proposals in Hinterland villages to demonstrate they are responding to a proven local need. However, given the emerging plan is still at Reg 18 stage, it is considered that very little, if any, weight can be attached to its policies. In this context, Policy CS11 of the adopted Core Strategy remains the appropriate basis on which to assess the current planning application.

Boxford Neighbourhood Plan

- 1.14 Babergh Parish was designated a neighbourhood plan area in August 2018 and the Parish Council are currently in the early stages of preparing a neighbourhood plan. In December 2018 it undertook a local survey, the results of which were published in February 2019¹. It achieved a response rate of 33%. The survey did not seek to undertake any assessment of housing need, but instead sought views on aspects list housing, business opportunities and services.
- 1.15 It found that the most valued community assets were the GP Surgery² and village stores, as well as the village hall, and residents mostly regarded traffic and parking (particularly around the school) as some of the main issues in the village. Around 35% of residents thought the village needed more housing, with a preference for infill development or smaller sites. In terms of housing types, most wanted to see affordable/social rented (37%), as well as small family homes (25%), single-storey housing (15%) and sheltered housing (12%). As noted within the planning

¹ Available at <https://www.boxfordsuffolk.com/files/parishCouncil/NeighbourhoodPlanResults2019.pdf>

² The Mill Surgery (Church Street, CO10 5DU) is a branch of Hadleigh Health Centre which is located c.5 miles away. 6 of the 10 GPs at Hadleigh Health Centre also offer appointments at the Mill Surgery in Boxford.

statement³, the proposal seeks to provide 35% affordable housing (in line with the Council's policy) as well as bungalows and a large percentage of 2-3 bedroom homes (albeit this is an outline application, so the precise mix will be determined through a reserved matters application).

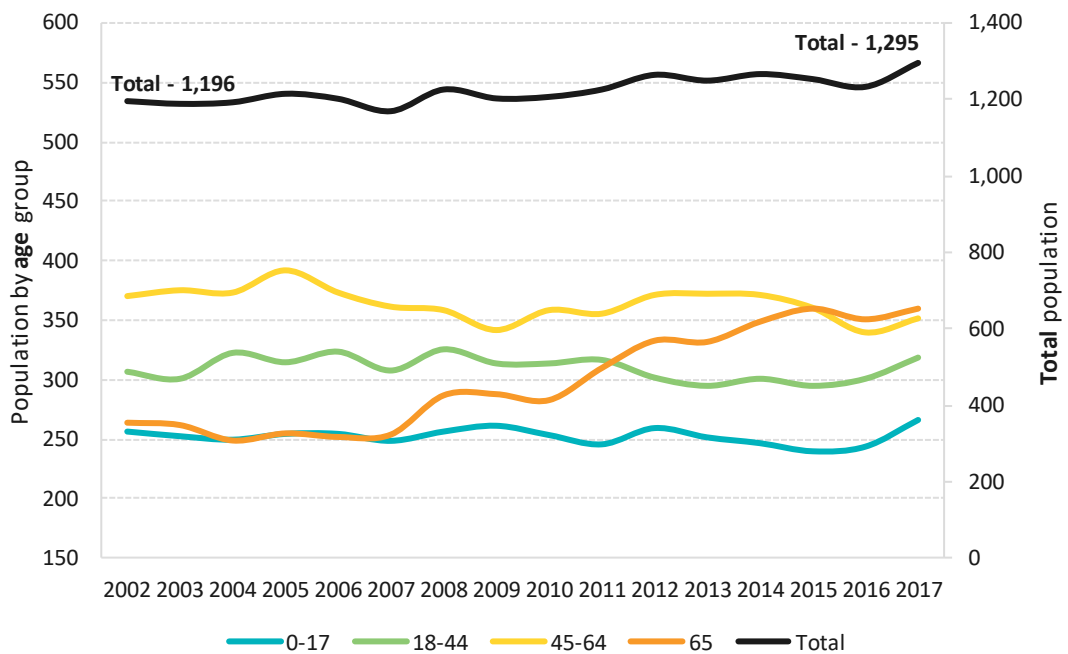
³ See https://planning.baberghmidsuffolk.gov.uk/online-applications/files/95D6B35CDFBF5664418A1859AF37F52C/pdf/DC_19_01873-PLANNING_STATEMENT-7202101.pdf para 5.48-9.

2.0 Context

Boxford village

- 2.1 Boxford itself is a Core Village, and benefits from convenience stores, a post office, pubs, a primary school, small scale employment, village hall, GP surgery, peak time bus services, recreation grounds and allotments⁴. As of 2017 the Parish’s population stands at 1,295; an 8% increase since 2001 when the population was 1,196, as shown in Figure 2.1. This rate of growth (8%) is the same as that seen across Babergh in the same period.
- 2.2 Like Babergh (and in line with national trends) Boxford has seen ageing of its population, with the number of people age 65+ the only group seeing any significant growth in the last 15 years. The village has broadly maintained the number of children and has seen a slight decline in the number of younger working age people, as shown in Figure 2.1.

Figure 2.1 Population by age and total change - Boxford 2002 to 2017

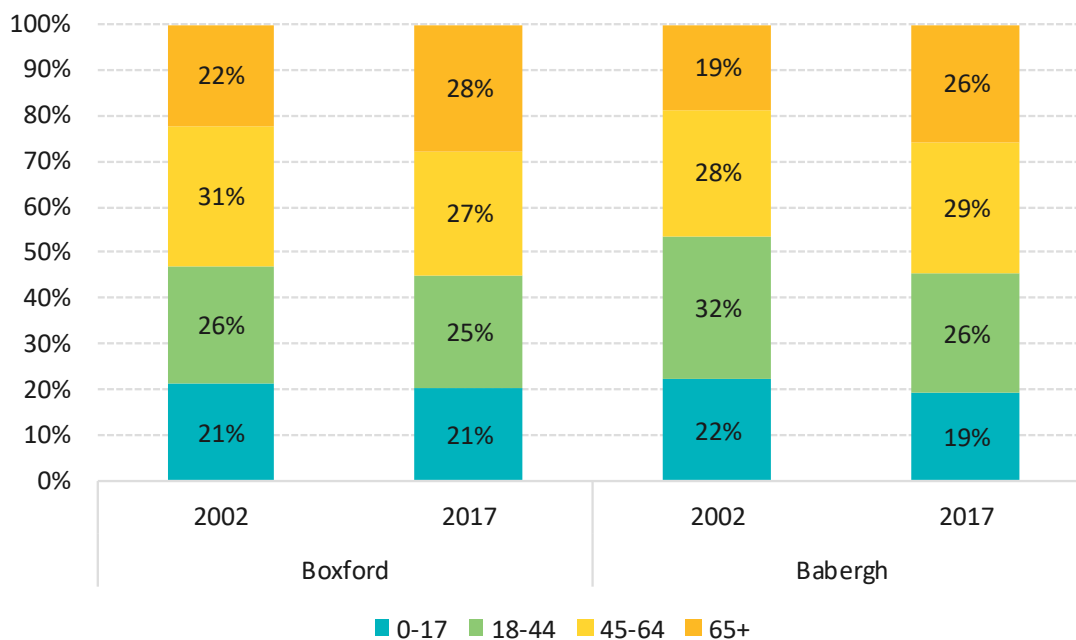


Source: Lichfields based on ONS Mid-Year Estimates

- 2.3 Figure 2.2 shows how the structure of the population of Boxford and Babergh have changed between 2002 and 2017, i.e. the proportion of people in each age group. In 2002, Babergh had a higher proportion of working age people (18-64) than Boxford, and a greater proportion in the young working age group (18-44). By 2017, both areas have seen ageing (with the number of over 65s increasing as a proportion of the total). The increase across Babergh has been greater (from 19% to 26%) but Boxford still has a higher proportion, at 28%. The main decline in Boxford has been in the working age group (specifically older working age people); the village has actually been able to roughly maintain the number of children.

⁴ Source: Babergh District Council Settlement Hierarchy Review Paper July 2019

Figure 2.2 Change in population age structure - Boxford and Babergh - 2002 and 2017



Source: ONS Mid-Year Estimates

2.4 Between 2001 and 2011 there was only a marginal increase in the number of dwellings in Boxford, from 537 in the 2001 Census to 540 in the 2011 Census. During this time the population remained at c.1,200. There has been a steady increase in the number of homes in the village since 2011, which has led to a recent boost in population growth. Alongside small scale development, the more significant developments in recent years in Boxford include:

- Development of 21 homes (market and affordable) at Goodlands;
- Development of 25 homes (a development by Suffolk Housing of 20 affordable rented and 5 market rent homes) at Land East of Boxford Court, Sand Hill (B/14/01259) which lies just north of Catesby’s site.

2.5 Sustaining the population – particularly the number of children – in and around Boxford in the future through new housing development will be of particular importance in supporting the village’s primary school. Boxford Primary School is currently just below capacity, with 193 students compared with 210 spaces⁵. It will be necessary to ensure that the number of children in the catchment area does not fall to unsustainable levels in the future to ensure the school can be sustained.

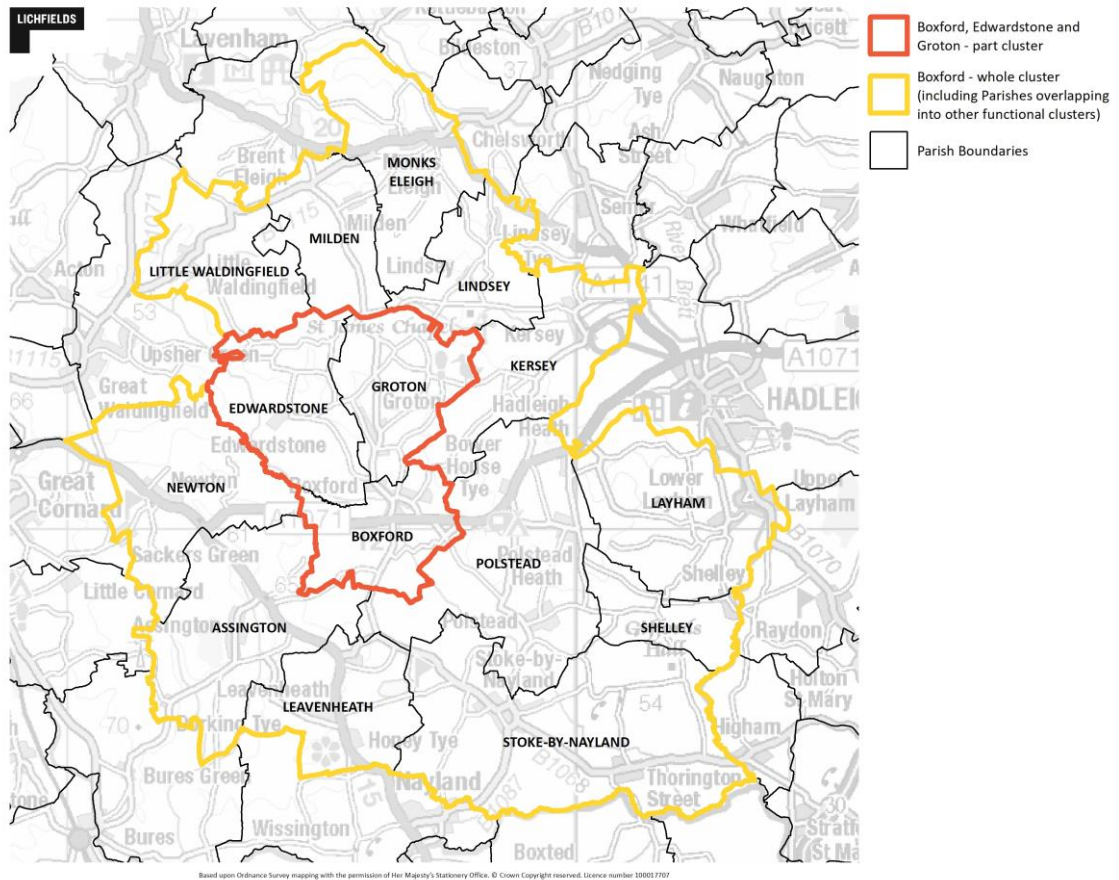
The Functional Cluster

2.6 The Boxford Functional Cluster (“the cluster”) covers the 14 Parishes⁶ plus Boxford itself. Of these 15 Parishes, three (Boxford, Edwardstone and Groton) fall solely within the Boxford cluster and do not overlap into other clusters, as shown in **red** in Figure 2.3. The other Parishes in the cluster overlap into other functional clusters, including Hadleigh, Bildeston, Lavenham, Sudbury and Great Cornard, and Nayland. The complete extent of Boxford’s cluster, including those Parishes which overlap into other clusters, is shown in **yellow** in Figure 2.3.

⁵ Source: Government website ‘Get information about schools’, accessed August 2019.

⁶ Assington, Edwardstone, Groton, Kersey, Layham, Leavenheath, Lindsey, Little Waldingfield, Milden, Monks Eleigh, Newton, Polstead, Shelley, Stoke-by-Nayland.

Figure 2.3 Boxford functional cluster



Source: Babergh Core Strategy 2014, Map 4

People and households

2.7 As of 2017 the population of the cluster is 7,611, representing 8.4% of Babergh’s population. Like the village, the Boxford cluster’s population is older than Babergh, with fewer people in the 0-17 and 18-44 age groups and more people in the 45-64 and 65+ groups, as shown in Table 2.1.

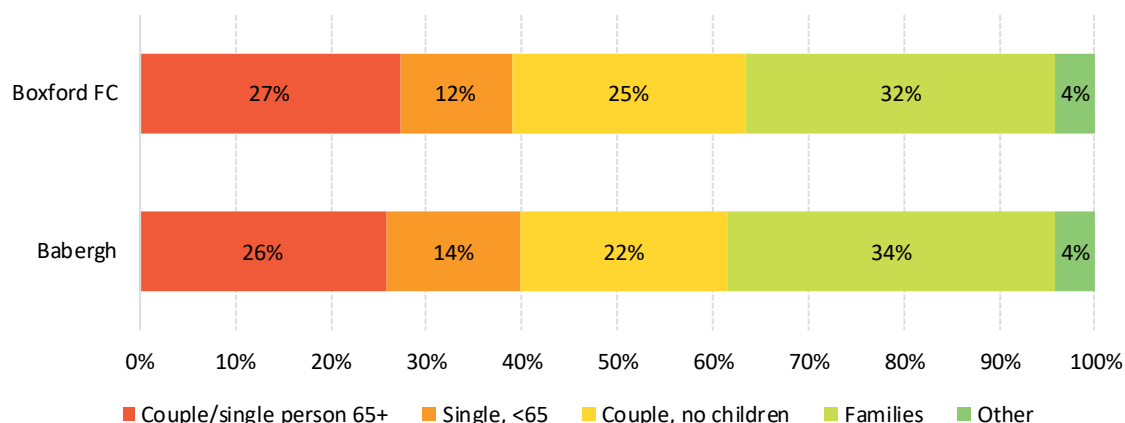
Table 2.1 Boxford Functional Cluster and Babergh Population, 2017

	Boxford cluster		Babergh	
	Population	As a % of total	Population	As a % of total
0-17	1,379	18%	17,580	19%
18-44	1,623	21%	23,645	26%
45-64	2,457	32%	26,288	29%
65+	2,152	28%	23,281	26%
Total	7,611	~	90,794	~

Source: Lichfields based on ONS Mid-Year Estimates

2.8 Reflecting its age structure, the cluster has a greater proportion of households who are over 65 and fewer families than Babergh, as shown in Figure 2.4. It has a higher proportion of couples with no children, reflecting its higher proportion of people in the 45-64 age group.

Figure 2.4 Household Composition, 2011



Source: Census 2011 LC4101EW

2.9 The cluster sees a higher rate of concealed families compared to the Babergh average, as shown in Table 2.2. Concealed families occur where more than one family lives in a household. This could be where adult children (e.g. a couple, alone or with children) are living in the family home (i.e. with parents) but can also occur where older generations live with adult children.

2.10 Whilst the number of concealed families in the cluster is low in absolute terms, this is partly because the number of families overall is low. However, the rate of concealment, particularly amongst younger households, is high. For example, 1 in 5 of families age 24 and under in the cluster is concealed, while across Babergh the rate is closer to 1 in 10. Whilst there may be varying reasons why families live within bigger households (e.g. for caring for others, being cared for, for cultural reasons, preference or waiting to move), in younger households, this is most likely to be because of the affordability of housing. The English Housing Survey⁷ found that 7% of all households in England (equivalent to 1.5m) contained at least one adult who wanted to move out but could not afford to do so, of which the vast majority (89%) were under 35.

Table 2.2 Concealed Families

	Babergh		Boxford cluster	
	Concealed	as a %	Concealed	as a %
All categories: Age of FRP*	233	0.9%	27	1.1%
Age 24 and under	54	10.4%	5	20.0%
Age 25 to 34	65	2.4%	6	4.4%
Age 35 to 49	31	0.4%	3	0.4%
Age 50 to 64	32	0.4%	4	0.5%
Age 65 and over	51	0.8%	9	1.3%

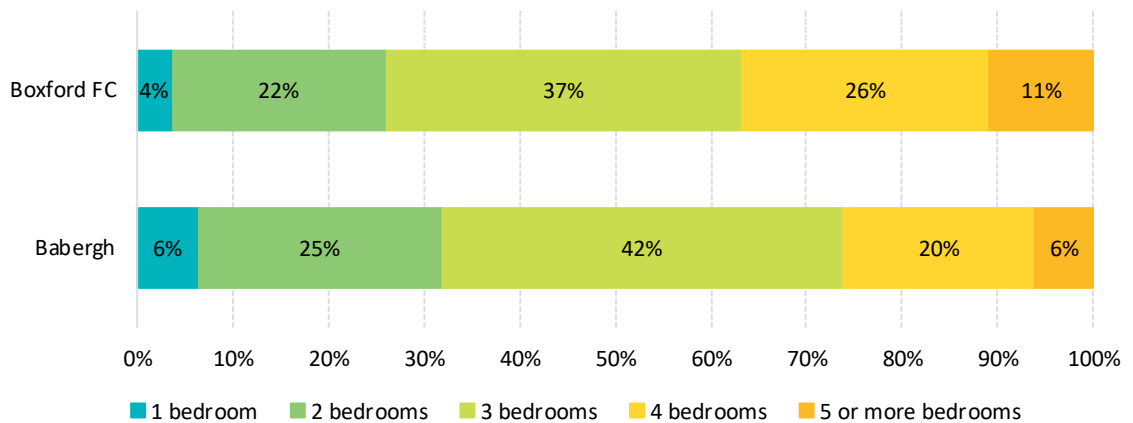
Source: Census 2011 LC1110EW. *FRP = Family Reference Person, or 'head' of family.

Housing

2.11 In 2011, the Census recorded 3,480 dwellings in the cluster. As expected of a rural area, the cluster has a higher proportion of larger dwellings than the district average, with over one-third of its dwellings having 4 or more bedrooms, as shown in Figure 2.5.

⁷ Source: English Housing Survey: Report on Future Home Owners, 2015/16

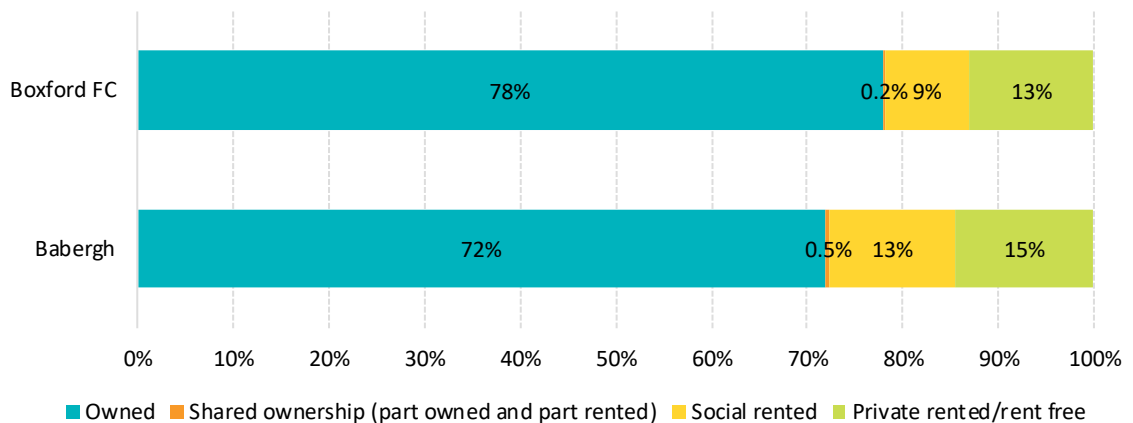
Figure 2.5 Number of bedrooms, 2011



Source: Census 2011 QS411EW

2.12 In 2011, 297 of the cluster’s 3,320 households were in affordable rented housing⁸, or 9%. This is lower than the district average of 13%. The number living in private rented housing is also relatively low compared to the district, with ownership being the dominant tenure in cluster, as shown in Figure 2.6.

Figure 2.6 Households by Tenure, 2011



Source: Census 2011 KS402EW

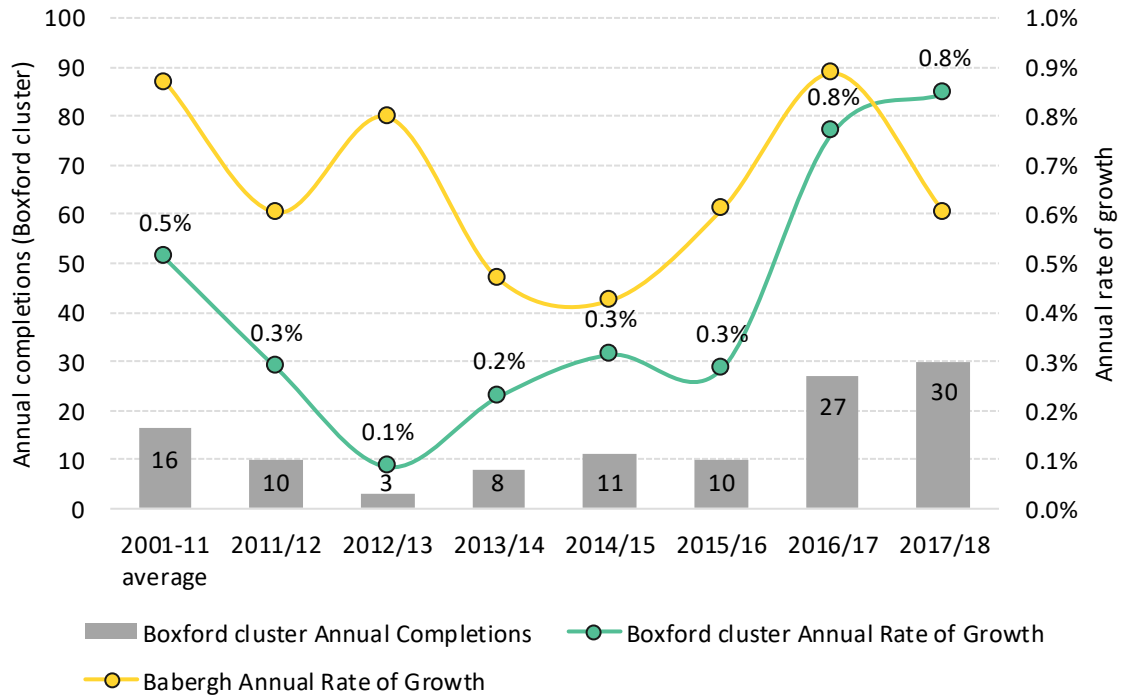
2.13 Between 2001 and 2011 the cluster saw average completions of 16 per annum, equivalent to growth of 0.5% per annum. This is lower than the average annual rate of growth across Babergh during the same period, of 0.9%, as shown in Figure 2.7. Given that according to the 2001 and 2011 Censuses, the number of dwellings in Boxford village itself increased only very marginally between 2001 and 2011, we can deduce that most development taking place in the cluster between 2001 and 2011 was taking place in the surrounding villages (or countryside).

⁸ The Census uses the term ‘social rented’ and defines this as including “accommodation that is rented from a council or local authority, or from a registered social landlord, housing association, housing co-operative or charitable trust”. Thus, the Census defines the ‘social rented’ tenure by the landlord of a household, rather than the level of rent paid (which, in policy terms, makes ‘social rented’ housing different to other forms of affordable rented housing). For simplicity, we refer to Census ‘social rented’ housing as ‘affordable rented’ housing in this report.

2.14

After 2011 the Boxford cluster continued to see a lower rate of growth than the Babergh average up until 2016/17 which is the only year in which the cluster has seen a faster rate of growth than the district, at 0.8%. We know that since 2011, some growth which the cluster has seen has taken place in Boxford itself, including development at Goodlands and development off Sand Hill.

Figure 2.7 Historic annual completions in the Boxford cluster and rate of growth in Boxford cluster/Babergh District



Source: Lichfields based on Babergh Annual Monitoring Report 2017/18

House prices

2.15

Across Boxford (Ward) entry-level (lower quartile) house prices in the year to December 2018 were £268,000; 25% above the district at £215,000. These relatively high house prices are a function of both Boxford’s stock (which is larger than the district average) and higher house prices across different types of housing. This is also likely to contributed to the relatively higher number of young concealed families, since young people looking to move into their own home within the local area might struggle to find affordable housing locally. Their options therefore are to move further afield (to cheaper locations, e.g. towns) or remain in the family home.

Figure 2.8 Lower Quartile House Prices 1995-2018 - Boxford (Ward) and Babergh



Source: ONS House Price Statistics for Small Areas

2.16 Table 2.3 shows the lower quartile price paid by type in Boxford compared to Babergh. Detached dwellings command the biggest premium in Boxford, being 35% above the district average. Terraced housing – the cheapest type - commands a slightly lower premium, of 31%, but still stands at almost £240,000. Semi-detached dwellings have the lowest premium, of 16%. The fact that even the cheapest dwellings in Boxford are some 31% above the district average is likely to exacerbate problems of local affordability, since lower income families are likely to need to look elsewhere for housing which is affordable.

Table 2.3 Lower quartile price by type - Babergh and Boxford (Ward)

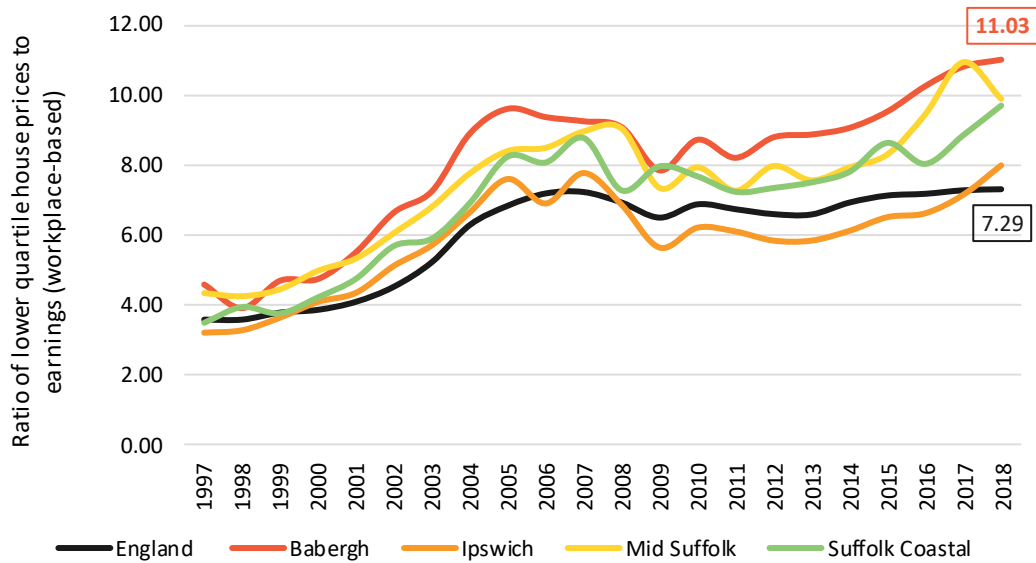
	Babergh	Boxford	Premium
Detached	£304,369	£411,000	35%
Semi	£219,999	£255,000	16%
Terraced	£183,306	£239,833	31%

Source: ONS HPSSA. *Note: To smooth prices an average is taken for prices paid in four periods: [1] the 12 months to March 2018, [2] the 12 months to June 2018, [3] the 12 months to September 2018 and [4] the 12 months to December 2018. There is insufficient data on sales of flats in Boxford to make a comparison.

Affordability

2.17 Affordability – the ratio of house prices to earnings – is a particularly acute issue in Babergh. Whilst house prices across the district are not notably high when compared to the national average, affordability is substantially worse, reflecting lower wages in the district. As shown in Figure 2.9, the ratio of lower quartile prices to lower quartile workplace-based earnings currently stands at 11.03 in Babergh; substantially higher than the national average of 7.3. In the last 20 years, affordability in Babergh has been worse than all other parts of the housing market area in almost every year.

Figure 2.9 Lower Quartile Affordability Ratio - England, Babergh and Ipswich Housing Market Area



Source: ONS

2.18 Recent data for housing affordability at a local level is not available, however ONS has published some experimental data which compares house prices by MSOA (for 2014) to weekly earnings (from 2011/12). The MSOA in which Boxford is contained (MSOA Babergh 009⁹) was the second least affordable part of Babergh district (out of 11 MSOAs) in 2014. The most expensive part of the district is the area just north of the Boxford cluster, i.e. the area broadly aligning with the Bildeston and Lavenham clusters. This aligns with the finding that prices in Boxford are significantly higher than the district average, and suggests that earnings are not sufficiently high to offset these prices. The combination of relatively low wages and relatively high prices creates an acute affordability issue locally.

Rents

2.19 Lower quartile monthly rents across the housing market area have increased in the last 5 years, as shown in Figure 2.10. In 2014 Babergh was the most expensive part of the HMA for rents, with lower quartile rents at £550 per month. In 2019 Babergh remained the most expensive part of the HMA with rents of £600 per month, albeit rents in Mid Suffolk were nearly as high (at £598). Babergh has not seen the rate of increase seen in some other areas (e.g. Ipswich), but rents have historically been high and remain high. Rents in Babergh are much higher than the national average, yet wages are lower¹⁰, suggesting (as with housing affordability) rental affordability is a particularly acute issue in the district.

2.20 Looking specifically at Boxford, a review of properties for rent as of August 2019 shows a total of 8 dwellings in the cluster¹¹ available for rent, with 2-beds ranging from £740 to £825 pcm and 3-beds starting from £1,150pcm. By comparison, 2-beds in Sudbury (one of the main towns in Babergh, which is cheaper than Boxford and located c.6 miles away) start at around £550pcm for flats and £650 pcm for houses, and 3-beds start at around £700-£800pcm. Rental

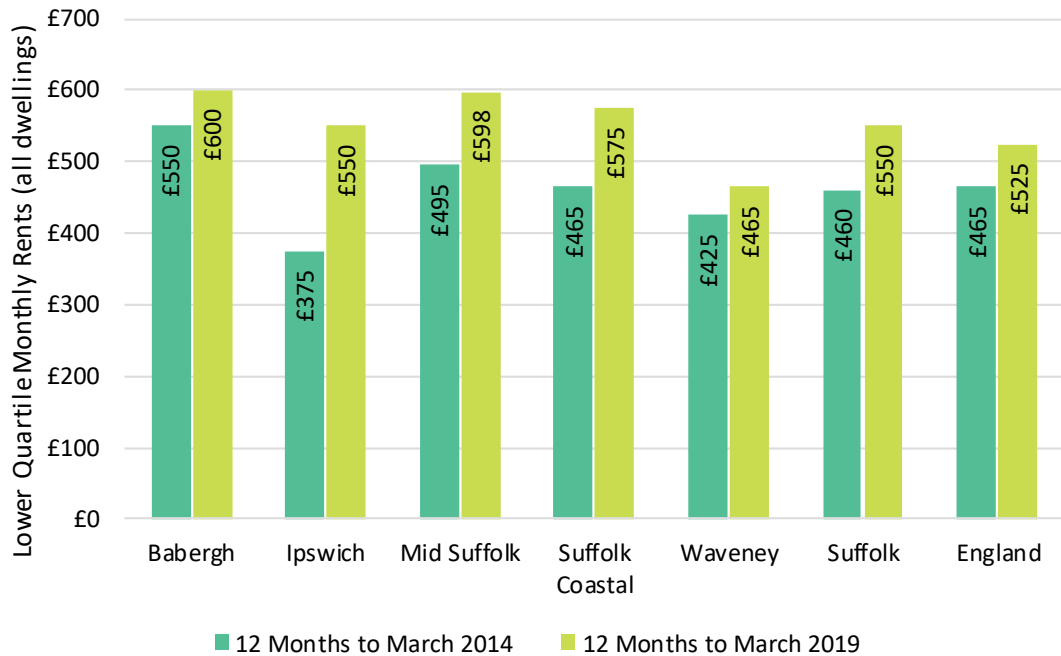
⁹ This MSOA covers Boxford, Edwardstone and Groton, along with most of the cluster to the south, including Assington, Leavenheath, Polstead, Stoke-by-Nayland, Nayland, Higham and Raydon.

¹⁰ According to ONS affordability data, lower quartile (workplace-based) earnings for England in 2018 were £21,275 compared to £19,493 for Babergh.

¹¹ We have reviewed dwellings for rent within a 3 mile radius of Boxford village, which broadly aligns with the cluster boundary.

affordability is likely to be an even more acute issue in Boxford and its cluster than Babergh as a whole.

Figure 2.10 Lower Quartile Monthly Rents (all dwellings) 2014 to 2019



Source: VOA Private Rental Market Statistics

Summary

- 2.21 Boxford is a well-served Core Village, serving a wider catchment area containing a further 14 smaller settlements. The village itself has seen little housing growth between 2001 and 2011 although there have been some developments in recent years which have helped keep population growth in line with the wider average. However, growth has not been equal across all age groups; while the number of under 65s has been broadly stable, the number of over 65s has increased in absolute and proportionate terms.
- 2.22 Across the cluster, housing development has been below the district rate of growth over the longer term (with the exception of 2017/18). As expected of a rural area, the cluster has a large proportion of large, owner-occupied stock and a relatively low amount of affordable housing (albeit this has improved with the recent development which included one scheme of 25 units of which 20 were affordable). Houses in Boxford command significant premiums when compared with similar types of housing across the district, with even the cheapest housing (terraced) commanding over a 30% premium compared to district averages, costing around £240,000. Affordability is an issue across Babergh more widely and even more so specifically within Boxford, and the same is true of rental affordability. The lack of affordable options available locally is likely to contribute to the relatively high level of concealed families (particularly young people) and result in some households having to move further afield to find affordable housing.

3.0 Functional Cluster Needs Assessment

- 3.1 In order to assess local housing needs associated with Boxford, it is necessary to define the relevant area. The judgment at East Bergholt has established that “*local housing need in Policy CS11 means housing need in the village and its cluster, and perhaps in areas immediately adjoining it*”, which reflects the role that core villages play in their functional clusters.
- 3.2 We know that a number of the Hinterland Villages contained within Boxford’s cluster overlap into other clusters. For these villages, the need arising might met in Boxford, but might be met equally met in other Core Villages which also serve those Hinterland Villages. By comparison, villages which fall solely within the Boxford cluster and do not overlap into other clusters (i.e. Boxford, Edwardstone and Groton) are likely to be best met within Boxford itself.
- 3.3 To assess the local housing needs associated with Boxford, we have therefore considered both the following geographies:
- 1 Boxford ‘part’ cluster – comprising the three Parishes which fall exclusively within the Boxford functional cluster (Boxford, Edwardstone and Groton). These are outlined in red in Figure 2.3 in Section 2.0 of this report. All housing needs arising within this part of the functional cluster fall solely within the Boxford cluster and thus it is reasonable to assume those needs will be met largely in Boxford. This indicates the absolute minimum level of need Boxford is likely to need to plan for; and
 - 2 Boxford ‘whole’ cluster – comprising all Parishes within the Boxford functional cluster, including those which overlap into other functional clusters. These are outlined in yellow in Figure 2.3 in Section 2.0 of this report. Needs arising here might be met in Boxford or one of the other adjacent clusters, but this gives an idea of the overall level of need that might be arising in the cluster.

Supply

- 3.4 In July 2019 Babergh District Council published for consultation its Housing Land Supply Position Statement 2019/20 to 2023/24 (and beyond). It seeks to provide an updated land supply position to that last published by the Council in 2018, and also takes into account the new definition of ‘deliverable’ set out in the 2019 NPPF. For the Boxford cluster (whole and part) the supply is as set out in Table 3.1. All supply within the cluster is expected to come forward in the 5 year period 2019/20-2023/24, with nothing coming forward in the subsequent period.

Table 3.1 Supply in Boxford Functional Cluster - 2019/20-2023/24

	Boxford - whole cluster	Boxford – part cluster
Sites with full planning permission	9	0
Sites under construction	10	0
Sites with outline planning permission	17	0
Sites with reserved matters consent	0	0
Small sites with planning permission (<10 units)	89	10
Total	125	10

Source: Babergh District Council. *Note: One site in Boxford (DC/18/04316/FUL) has been removed from the Council’s supply as this is erroneously referred to as delivering 1 dwelling (net) in the 5 year period. The Council’s housing trajectory [and a review of the application] shows that the net number of dwellings is 0 as the existing detached bungalow on site is to be demolished.

- 3.5 In total within Boxford itself there are expected to be 6 units coming forward (net) – all in the next 5 years. A total of 4 new dwellings are currently under construction at Cygnet Court (off

Swan Street), 1 new dwelling is under construction at Land adjacent to Old School House and 1 dwelling is yet to be started at The Pippins, Calais Street, as shown in Table 3.2. The other 2 sites in Boxford are expected to provide 1 dwelling each however both are following the demolition of existing dwellings, so will not provide any net additional dwellings.

Table 3.2 Summary of supply in Boxford for 2019/20 onwards

Address	Ref No.	Status	Dwellings (Gross)	Dwellings (Net)
Cygnets Court, Swan Street	B/15/01078/FUL	Under construction	4	4
The Pippins, Calais Street	B/17/01095/OUT	Not started	1	1
Land adjacent to the Old School House, School Hill	DC/17/04548/FUL	Under construction	1	1
The Bereley, Cox Hill	DC/18/03686/FUL	Not started	1	0
Boxwood Hall, Butcher's Lane	DC/18/04316/FUL	Under construction	1	0*
Total	~	~	8	6

Source: Babergh District Council. *Site appears as 1 net dwelling in the Council's trajectory but has been removed for the reasons set out above under Table 3.1.

- 3.6 As set out in the planning statement accompanying the application (prepared by Neame Sutton), the applicant was aware of a draft proposal on land immediately west of Sand Hill (i.e. opposite the proposed scheme) however when the planning statement was prepared no application had been submitted so this had not been considered in terms of cumulative impacts. A review of applications submitted as at August 2019 (when this report was being prepared) similarly showed no submitted applications on the site or elsewhere in Boxford, hence it has not been included in our assessment of supply.

Top-down needs assessment

- 3.7 In 2017 the Council published a Strategic Housing Market Assessment (SHMA) for the purposes of its emerging plan. The SHMA set out objectively assessed housing need (OAN) in line with the 2014 PPG and confirmed that the housing requirement in the Core Strategy was out of date. The SHMA found that OAN for Babergh was 355 dpa 2014-36 (approximately a 50 dpa increase in the overall rate of growth in the Core Strategy), and this OAN was subsequently used by the Council for calculating five year land supply. Insofar as it might be relevant to setting the minimum number of homes needed in the District, the SHMA OAN for Babergh has now been superseded due to the publication of the new NPPF in July 2018 (and associated PPG) which sets out a standard method by which minimum housing needs are calculated. The standard method now applies for the purposes of five year land supply (and decision taking) and will underpin the emerging plan (this is confirmed in the recent Reg 18 plan, published in July 2019). Therefore, the SHMA OAN is no longer the starting point for Babergh for the purposes of plan-making or decision-taking.

Scenario 1: Babergh District Council Standard Method figure

- 3.8 The Council's Reg 18 Local Plan set out the standard method figure which will underpin the new plan – 420 dpa over the period 2018-36 (7,560 dwellings in total). For the purposes of this assessment, we have considered how much housing this equates to over the period 2019 to 2031 as this aligns with the base date in the Council's most recent housing trajectory¹² and the end

¹² The Council's most recent annual monitoring report which sets out completion by functional cluster shows completions in 2017/18. Whilst the recent housing trajectory shows completions by Parish for 2018/19, this is only on sites still under construction, not all sites in the district. Therefore the total for completions on sites under construction for Babergh as a whole

date of the adopted Core Strategy period. There is nothing to suggest that historically or in recent years Boxford has seen an unusually high levels of housing growth (in fact over the long term growth rates have consistently been lower than the district average) hence there is no need to account for this in the assessment.

- 3.9 Applying the proportional share to the district's annual requirement of 420 dpa, to the end of the Core Strategy period yields 387 dwellings for the whole cluster to 2031 and 100 in the part cluster, as shown in Table 3.3.

Table 3.3 Top-down Scenario 1: Babergh Standard Method (420 dpa)

	Boxford – whole cluster	Boxford – part cluster
2017 Population	7,611	1,963
Share of district's population	8.4%	2.2%
Share of 420 (dpa)	35	9
Over 11 years (2019 to 2031 – current CS period)	387	100

Source: Lichfields based on ONS Mid-Year Estimates, Babergh District Council. May not sum due to rounding. 2017 Population data is the most recent data available at a sub-district level as of August 2019.

Scenario 2: Alternative standard method figure

- 3.10 The Council's standard method figure assumes that the 40% cap applies to the overall Core Strategy requirement for the 2011-31 period (i.e. 300 per annum). However, the requirement is stepped, with a lower requirement for the 2011-17 period and a higher requirement (325 dpa) for the 2017-31 period. The PPG guidance on the standard method is not clear about which figure the cap should be measured against when strategic policies contain a stepped requirement. If – where policies contains stepped trajectories – the average annual requirement for the current period applies (i.e. in the case of Babergh, the annual requirement is treated as 325 dpa, not 300 dpa), then this will yield a higher standard method figure of 429 per annum (because the cap is higher), as shown in Table 3.3

Table 3.4 Standard method – Alternative calculation using up-to-date data and higher Core Strategy requirement

	Figure
Household growth	2019 – 39,946 2029 – 42,878 2019-2029 = 293.2
Affordability ratio	Median, workplace-based (2018) – 11.39
Uplift	46.2%
Figure	428.6 per annum
Cap	40% above whichever is higher of household projections (293.2) or Core Strategy requirement (325) = 325 + 40% = 455
Figure	As 428.6 does not exceed 455, figure is 428.6 (429) per annum

Source: MHCLG 2014-based household projections, ONS Affordability data, PPG

- 3.11 Applying this standard method figure and the population shares of the cluster would suggest a slightly higher level of need; 395 in the whole cluster and 102 in the part cluster as shown in Table 3.5.

does not sum to the total reported completions in the district for 2018/19 and cannot be used to calculate completions in the cluster for 2018/19.

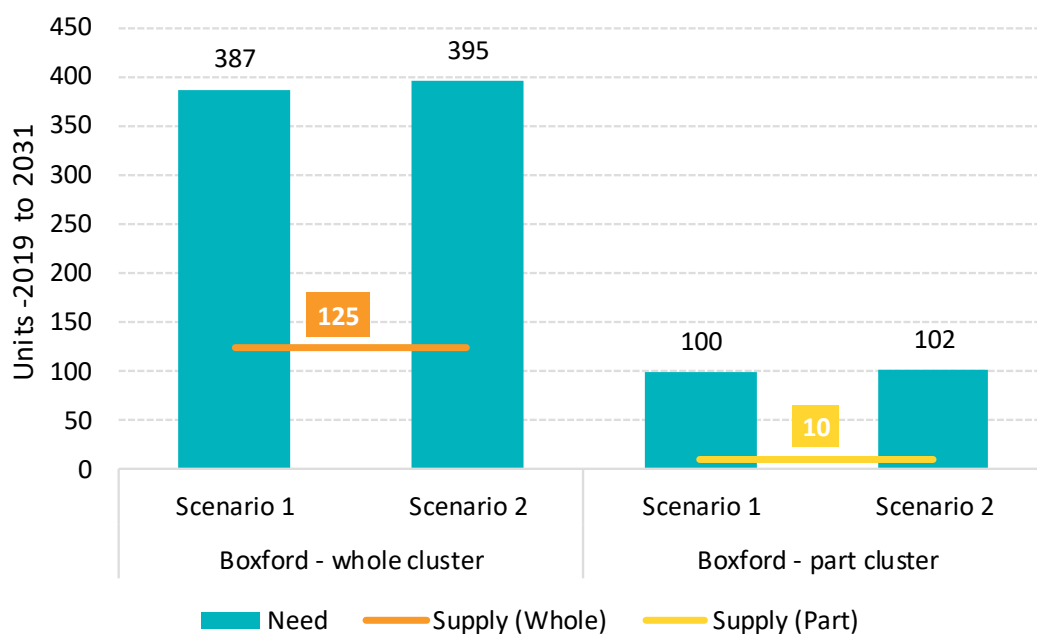
Table 3.5 Top down Scenario 2: Babergh Standard Method alternative

	Boxford – whole cluster	Boxford – part cluster
2017 Population	7,611	1,963
Share of district’s population	8.4%	2.2%
Share of 429 (dpa)	36	9
Over 11 years (to 2031 – current CS period)	395	102

Source: Lichfields based on ONS Mid-Year Estimates, Babergh District Council. May not sum due to rounding. Based on standard method figure of 428.6218

3.12 A summary of how the top-down scenarios for Boxford’s cluster compare with supply to 2031 is shown in Figure 3.1. Across the **whole cluster**, the shortfall ranges from around **260 to 270 dwellings** to 2031, and in the **part cluster** (Boxford, Edwardstone and Groton) the shortfall is **c.90 dwellings**.

Figure 3.1 Summary of need and supply 2019 to 2031 - Top-down scenarios - Boxford cluster



Source: Lichfields analysis

Bottom-up

3.13 A bottom-up assessment starts with the local population – in this case the current (2017) population of the cluster - and applies various assumptions around births, deaths, migration and household formation to assess growth in the future. We have modelled change to 2031 to align with the end date of the adopted Core Strategy and have used the industry standard ‘PopGroup’ toolkit.

3.14 For consistency with the approach at the district level, an affordability uplift is applied to these scenarios in line with the standard method. This is because the district-wide standard method figure is derived from household projections plus an uplift and the district-wide need is the sum of need across all the areas within it. It would be inconsistent to – at a sub-district level – to assess need only with regard to demographic change (i.e. population and household growth) whilst applying an affordability uplift in the district-wide figure.

- 3.15 As set out above, there is currently some uncertainty what the standard method figure (and uplift) for Babergh is because the PPG is not wholly clear on how the cap is applied in circumstances where strategic policies set out a stepped trajectory. For the purposes of this assessment, we apply both uplifts.

Scenario A: Local growth (share of district migration)

- 3.16 The amount of migration seen across the district is a function of migration to/from the settlements within it. Therefore, is it reasonable (indeed necessary) to assess housing needs across the various clusters, taking into account migration. Because the sub-national population projections (SNPP) do not provide a breakdown of migration below district level, the amount of migration to the cluster is based on the assumption that it accommodates migration in proportion with its size.
- 3.17 To 2031 this scenario is expected to generate population growth of 345 across the whole cluster, of which all is a result of net migration. This is expected to generate a need for 242 dwellings, or 339-354 once a market signals uplift is applied, as shown in Table 3.6. This is evidently well in excess of the supply expected to come forward, which totals 125 units. Across the part cluster the need is expected to be 87, rising to 122-128 with a market signals uplift. Again, this is well in excess of the supply – of 10 units.

Scenario B: District Rate of Growth

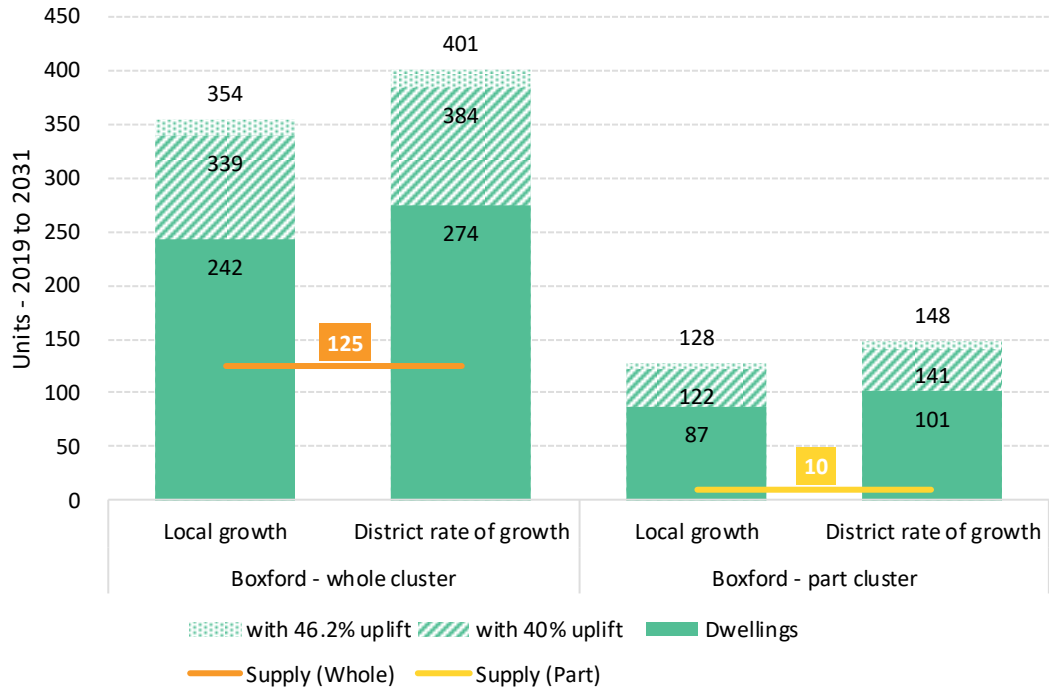
- 3.18 An alternative way of apportioning projected growth at the district level is to assume that the population of settlements within Babergh grow at the same rate as the population of Babergh as a whole. The 2016-based SNPP expects Babergh's population to grow by around 0.4%-0.5% per annum over the next 20 years. Assuming the Boxford cluster grows at the same rate annually, the need would be 274 to 2031, rising to around 400 with a market signals uplift. Across the part cluster, the need would be 101 dwellings, rising to c.140-150 once a market signals uplift applied.
- 3.19 A summary of the outcomes associated with Scenarios A and B is shown in Table 3.6 and Figure 3.2.

Table 3.6 Summary of demographic and housing outcomes for Boxford cluster – 2019* to 2031 - Bottom-up Scenarios

	Scenario A: Local growth (share of district migration)		Scenario A: District Rate of Growth	
	Boxford – whole cluster	Boxford – part cluster	Boxford – whole cluster	Boxford – part cluster
Population change	345	75	423	109
of which natural change	-530	-111	-524	-109
of which net migration	875	186	947	218
Dwellings	242	87	274	101
with 40% uplift	339	122	384	141
with 46.2% uplift	354	128	401	148
Supply	125	10	125	10

Source: Lichfields using POPGROUP. *The latest population estimates for Boxford are dated mid-2017 however for consistency with the Council's supply (which has a base date of 2019) we have presented the outcomes associated with the 2019-31 period.

Figure 3.2 Summary of need and supply 2019 to 2031 – Bottom-up scenarios



Source: Lichfields analysis

4.0 Summary

- 4.1 This report has been prepared by Lichfields on behalf of Catesby Development Land Ltd in the context of an outline planning application for up to 64 no. dwellings at Land to the East of Sand Hill, Boxford, Suffolk.

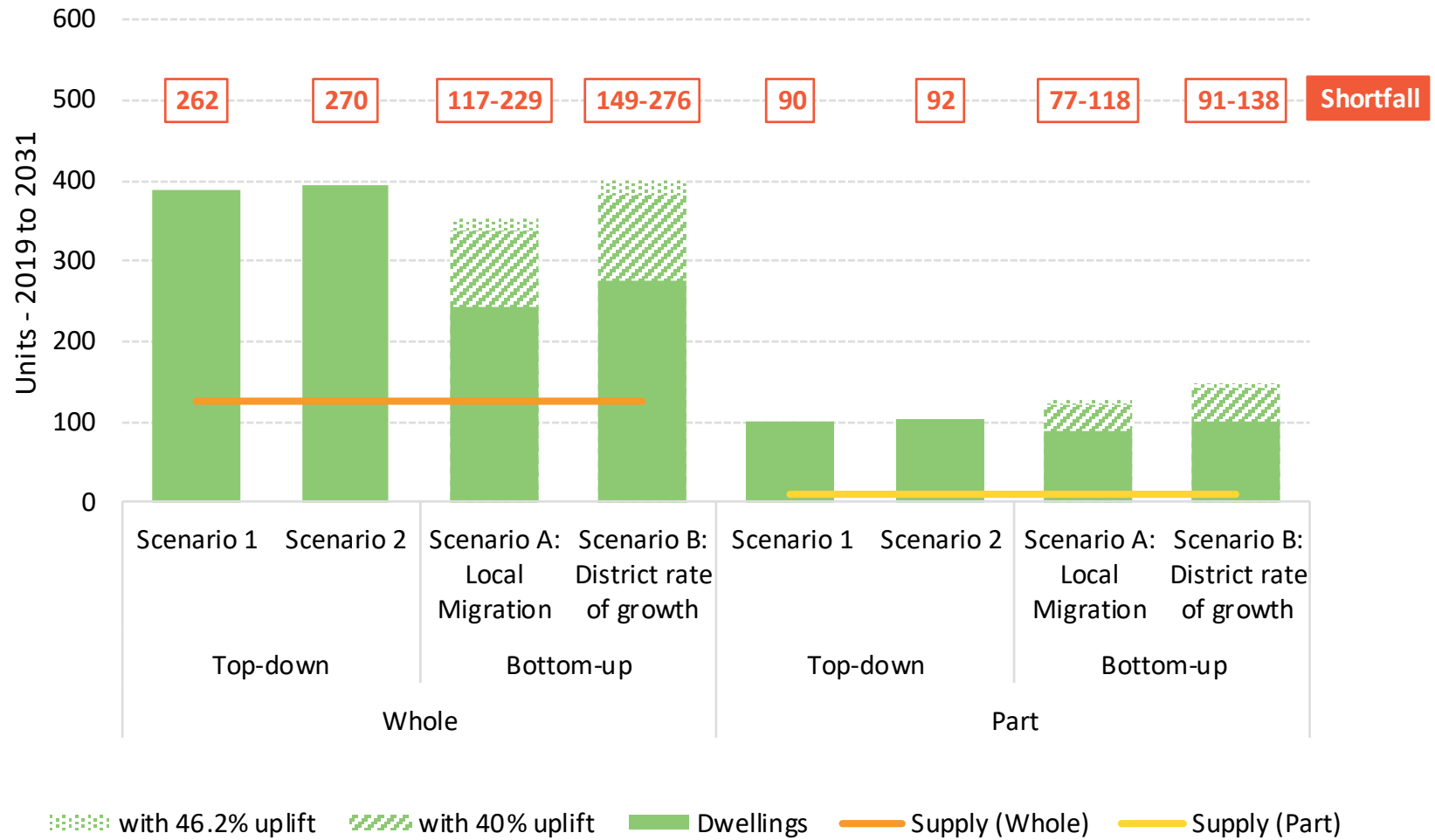
Policy and guidance

- 4.2 The Babergh Core Strategy makes clear that “*in all cases the scale and location of development will depend upon the local housing need*” and that “*Core Villages will act as a focus for development within their functional cluster.*” One of the criteria in the Core Strategy policy on Core Village requires it to be demonstrated that proposals are meeting “*... locally identified need – housing and employment, and specific local needs such as affordable housing*”.
- 4.3 Fortunately, in the case of Babergh, it has been established within the courts what is defined by ‘locally identified need’ in the context of Core Villages; “*...local housing need in Policy CS11 means housing need in the village and its cluster, and perhaps in areas immediately adjoining it*”. We have therefore assessed needs for Boxford (a Core Village) with regard to this definition.

Boxford

- 4.4 Boxford is a Core Village in Babergh providing a good range of day-to-day services (including shops and a school) and serving a surrounding area which encompasses 14 smaller villages and the countryside. As expected of a rural area, the cluster has a large proportion of large, owner-occupied stock and a relatively low amount of affordable housing. Houses in Boxford command significant premiums when compared with similar types of housing across the district, with housing and rental affordability acute problems across Babergh as whole and in Boxford itself. The relatively low levels of housing development over the last 15-20 years in the cluster are likely to have contributed to this (in addition to the high rate of concealment amongst young families in the local area).
- 4.5 Figure 4.1 summarises the outcomes in terms of need, supply and overall shortfall across all scenarios in the cluster. Just **within the part cluster, the shortfall is likely to be at least 90 dwellings to 2031, but could be up to c.140 dwellings**. As the Core Village at the centre of a functional cluster, at the very least Boxford should be meeting most (if not all) of the needs arising within the hinterland villages and countryside which do not overlap in to other clusters (i.e. Boxford, Edwardstone and Groton).
- 4.6 However, caselaw has established that in the case of Core Villages ‘local’ needs are those arising in the village and its cluster (and perhaps the areas immediately adjoining). Looking at the whole of the Boxford cluster, the shortfall is even greater. At an absolute minimum c.120-150 dwellings are needed solely to meet demographic needs arising in the cluster, albeit this fails to factor in an uplift for market signals and would not be consistent with the district-wide assessment of need. Accounting for such an uplift would imply **a shortfall of c.230-280 dwellings to 2031 on a ‘bottom-up’ basis in the whole cluster and c.260-c.270 on a ‘top-down’ basis across the whole cluster**.
- 4.7 There is therefore evidence of a shortfall in housing provision in the remaining Core Strategy period in the Boxford cluster (whether looking at the part or whole cluster), thus fulfilling the requirement in CS11 that proposals demonstrate evidence of local need. The proposed scheme (which will deliver up to 64 new homes) would help to meet some of this identified shortfall in housing within the Boxford cluster.

Figure 4.1 Summary of need, supply and shortfall in Boxford Functional Cluster (Whole and Part) - 2019 to 2031



Source: Lichfields analysis

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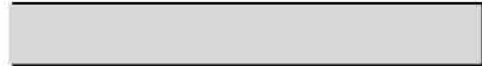
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(10) BOYER PLANNING (obo VISTRY GROUP)



Section One: Respondents Details

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

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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.	Box 1; Box 2; Box 3
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support		Oppose	<input checked="" type="checkbox"/>
Support with modifications		Have Comments	

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

Policies BOX 1, BOX 2, and BOX 3 do not meet basic conditions a) or d) for the reasons set out and explained in the accompanying statement.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please see the accompanying statement.

(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 ..

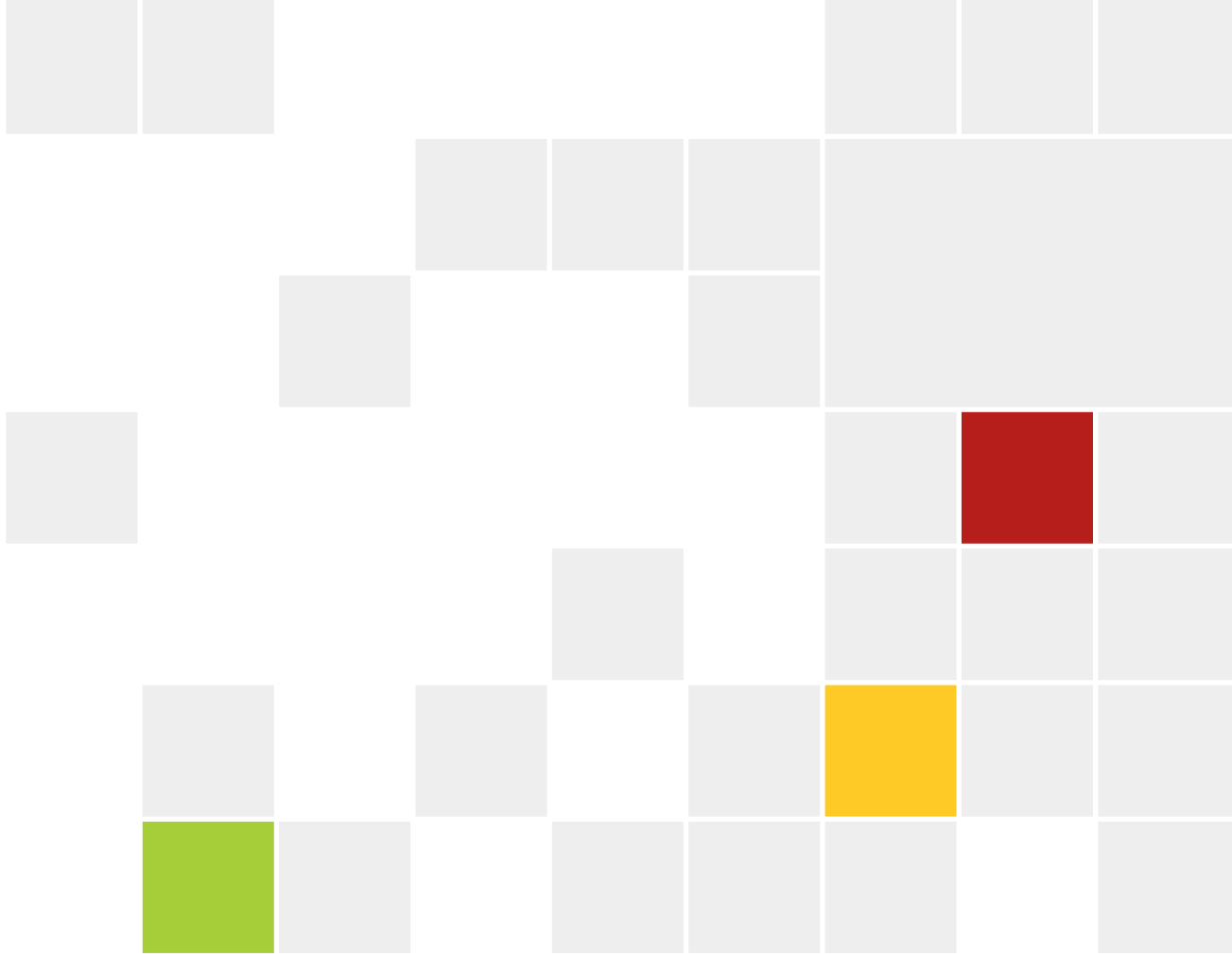
(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	Y
The final 'making' (adoption) of the Boxford NDP by Babergh District Council	Y

Signed: L Hindle

Dated: 29.04.2022



Land North of Butcher's Land, Boxford

Representations to Boxford Neighbourhood Plan (2021-2037)
Submission Version (January 2022)



Boyer

Report Control

Project:	Land North of Butcher's Lane, Boxford
Client:	Vistry Homes Ltd
Reference:	20.6026
File Origin:	2022
Primary Author	Libby Hindle
Checked By:	

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
V1	29.04.2022	Final	Libby Hindle

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APPENDIX

Appendix One – Vision Document

Appendix Two – Local Housing Need

1. INTRODUCTION

- 1.1 These representations are submitted by Boyer on behalf of Vistry Group (trading as Vistry Homes Limited) in response to consultation on the Boxford Neighbourhood Plan (2021-2037) (BNP) Submission version (January 2022) consultation under Regulation 16 of the Neighbourhood Planning Regulations.
- 1.2 These representations make specific reference to land north of Butcher's Lane, Boxford ('the Site'), as illustrated in the Vision Document at Appendix One.
- 1.3 Vistry Group (formerly Linden Homes, Bovis Homes and Galliford Try Partnerships), have been promoting the Site for a number of years through the Babergh and Mid Suffolk Draft Joint Local Plan ('the Draft JLP'), and were active participants in the examination hearing sessions that took place in 2021. Vistry Group will continue to engage with the progression of the Draft JLP.
- 1.4 Vistry Group support the production of the BNP, as it positively enables the local community to guide the development and growth of their local area.
- 1.5 As set out within National Planning Practice Guidance (NPPG), Neighbourhood Plan policies should be clear and unambiguous. National policy and guidance requires that Neighbourhood Plans are in general conformity with the adopted Local Plan in their area. The existing Babergh Local Plan is out of date and the Draft JLP is not expected to be adopted until 2023, following further fundamental review and examination. Therefore, the preparation of the BNP should be in general conformity with the Draft JLP. The BNP will need to be flexible and robust to ensure that it can satisfy the Neighbourhood Planning regulations and the Basic Condition tests.
- 1.6 Once made, the BNP will form part of the Development Plan and therefore the document will be fundamental in shaping the future of Boxford. The Neighbourhood Plan should support the delivery of strategic policies contained in the emerging JLP, and should guide and direct development that is outside of these strategic policies.
- 1.7 From our review, the majority of the principles of the BNP appear to be sound, and the context of the policies and objectives appear to be locally based. In principle, the BNP would largely fulfil its role effectively as the 'local' element of the 'Development Plan'. However, there are a lack of sites allocated for development within the BNP and there is concern with the housing strategy which largely relies upon requirements being met through individual and small groups of dwellings. There is also concern over the reliability of the AECOM Site Options and Assessment Report (August 2021), upon which site allocations have been made. For the reasons set out within these representations, the BNP should consider the inclusion of a larger site for allocation to ensure that substantial community benefits can also be delivered from future development in the village rather than becoming susceptible to a range of small speculative developments that are limited in their ability to deliver public benefits.

1.8 When considered against the necessary Basic Conditions as required by Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011), it is our view that, as currently drafted, the BNP is not in conformity with National Planning Policy and would not contribute to the achievement of sustainable development, and a such would fail to meet the necessary Basic Conditions. The Basic Conditions relevant to the making of a neighbourhood plan are:

- Condition 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;
- Condition d: the making of the neighbourhood plan contributes to the achievement of sustainable development;
- Condition e: 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);
- Condition f: the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
- Condition g: prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for neighbourhood plan.

1.9 The BNP has been reviewed in both its own context and in relation to the Site. Section 2 of these representations provide details of the Site and its ability to be developed for a high quality landscape and heritage led development offering significant community benefits. Section 3 considers the relevant supporting documents to the BNP and Section 4 provides our response to the Submission BNP document. Summary and conclusions are drawn in Section 5.

2. LAND NORTH OF BUTCHER'S LANE, BOXFORD

Introduction

- 2.1 Vistry Group are actively promoting the land north of Butcher's Lane, Boxford for the delivery of a high-quality, landscape-led residential development.
- 2.2 The Site is located towards the north eastern edge of Boxford, and is well related to the built up area of the village, adjoining the defined settlement boundary to the west and forming part of the Conservation Area. The Site is situated between existing residential development on Butcher's Lane and the recreation ground to the north. The Site comprises a single field extending to approximately 12.9 hectares (7 acres), which is overgrown and unintegrated with its surroundings. The Site is privately owned and not currently accessible to the community.
- 2.3 We believe that the Site presents an opportunity to integrate an attractive and sustainable landscape-led new neighbourhood within the existing community of Boxford. Inspired by the landscape and heritage context, physical characteristics of the Site, and its relationship with the village, the proposals seek to deliver new housing around a network of publicly accessible green open spaces to provide homes, infrastructure and recreation routes for the community.
- 2.4 A Vision Document setting out the considerations that have informed the evolution of a Concept Masterplan has been prepared by Boyer (included at Appendix One). The document illustrates the opportunity for a considerate, context responsive development within Boxford. The Vision Document demonstrates how the design principles of the Concept Masterplan have been informed by input from technical consultants including landscape, heritage and transport, to provide a realistic and sustainable vision.
- 2.5 The Site comprises greenfield land and there are no known constraints that would preclude its development. The Vision Document demonstrates how the Site can be developed taking a landscape and context led approach that is considerate of the impact upon the wider countryside, the Boxford Conservation Area and nearby heritage assets, including St Mary's Church (Grade I Listed Building) to the south-west.
- 2.6 The Site presents an excellent opportunity to create a well-designed, attractive and sustainable development with a capacity of approximately 50-55 homes that are well-connected to the existing settlement and would contribute to the identified local development needs of Boxford.

Planning Policy Background

- 2.7 Babergh District Council is working together with Mid Suffolk District Council on the preparation of a Joint Local Plan (JLP). The Babergh and Mid Suffolk JLP was formally submitted for Examination on 31st March 2021. The Examination Hearing Sessions were split into Stage 1 and Stage 2. The Stage 1 Hearings commenced on 21st June 2021.
- 2.8 The Examination was paused following the hearing into Matter 4 (Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process) however due to the Inspectors having concerns over the spatial distribution and site selection process. In a letter dated 18th November 2021, the Councils detailed their thoughts on the scope of additional work that needs to be undertaken in relation to Matter 4 and Matter 2 – Gypsy and Traveller, and Travelling Showpeople Provision and Boat Dwellers.
- 2.9 The Inspectors issued their response to the Councils in a letter dated 9th December 2021, advising that a more fundamental review is likely required in respect of the settlement hierarchy, spatial distribution of housing and the housing site selection process. It was advised that the settlement hierarchy review should consider all tiers of settlement and that housing allocations in all tiers of settlement should be reassessed.
- 2.10 In order to address the concerns, the Inspector's recommend a Part 1 Local Plan to be followed by a Part 2 Local Plan as soon as possible. It is anticipated that the work required for the Part 2 Local Plan could be undertaken outside the "live" Local Plan Examination.
- 2.11 An exploratory post-hearing meeting was held between the Inspector's and the Council on 16th December 2021 to further discuss these matters. It was agreed to move forward with the Inspectors suggested approach, which will require the Council to remove policy on spatial strategies and all allocations to create the Part 1 Local Plan, on the basis that the plan can still be found sound given the level of already committed development. This will require the Part 2 Plan to set out allocations for later years of the plan period.
- 2.12 Boxford was identified as a Core Village within the Draft JLP and therefore recognised as a focus for new housing. However, despite this no sites were proposed for allocation in the main Boxford village within the Draft JLP (just one site for 5 dwellings is proposed within the Boxford Stone Street Hamlet). This suggests that any additional new housing in Boxford will rely solely on existing commitments (8 dwellings).
- 2.13 On behalf of Vistry Group, Boyer submitted representations to the Draft JLP Pre-Submission (Regulation 19) consultation in December 2020, followed up by Hearing Statements to the Draft JLP Examination, and participated at the Examination hearing sessions, to explain how the Draft JLP is not consistent with the aims of the NPPF. The current Draft JLP approach creates the potential for the community to be rendered vulnerable to speculative development, with no involvement as to what is developed in their village. As has been recognised by the Local Plan Inspectors, the Draft JLP approach is unsound.
- 2.14 The Draft JLP should seek to rectify the position presented by the limited housing growth that has been attributed to Boxford. Whilst the progression of the JLP has stalled, the BNP

should acknowledge the comments and concerns raised by the Local Plan Inspectors to ensure that an appropriate and consistent approach is taken, and to avoid becoming swiftly out of date when the JLP is then adopted. The Neighbourhood Plan should include the allocation of suitable land to deliver an appropriate quantum and form of development for the village, such as that presented by land north of Butcher's Lane. This would afford the community greater control over development that comes forward in their village, and ensure that they are not left open to speculative developments, particularly as there is evidence of local housing need, as set out at Appendix Two of this Report.

Vision

2.15 Vistry Group' vision for land north of Butcher's Lane is as follows:

"To deliver an attractive and sustainable new neighbourhood that the existing and future residents of Boxford will be proud of and in which people will aspire to live. The new development will be complemented with a network of attractive green spaces that will be accessible to the existing and new communities, framed by high quality new homes."

2.16 The Vision Document included at Appendix One, shows initial proposals for how the Site could be brought forward for development in a sensitive and sustainable manner. Further details regarding the Site are set out below.

Land Ownership and Deliverability

2.17 The Site is solely in Vistry Group's control. This significantly de-risks the deliverability of the Site as there are no third parties involved in promotion.

Highways and Access

2.18 A primary point of access into the Site is proposed from Butcher's Lane. This will enable safe access for all modes of transport.

2.19 A network of routes and streets will be integrated within the proposals to promote a permeable and legible development.

2.20 Opportunities will be optimised to provide pedestrian and cycle links to integrate the development within the village and the existing public footpath running along the western boundary of the Site. A circular trail will also be incorporated into the proposals with a combination of more formal footpaths, softer no-dig routes along green corridors and board walks / decks. This will formalise pedestrian desire routes and provide a significant community benefit. Safe crossings will also be provided.

Flooding and Drainage

2.21 The Site lies within Flood Zone 1 (low probability) and there is no surface water flooding on site. Drainage and points of discharge for surface water drainage would be agreed as part of the detailed design stage with the LLFA.

- 2.22 Development of the Site would incorporate sustainable drainage measures in the form of basins or swales.

Landscape

- 2.23 A landscape-led approach has been taken to developing the Concept Masterplan and has been informed by an initial landscape and visual assessment of the land.
- 2.24 Development of the Site would retain and strengthen existing landscape assets around the Site boundary and new green links would also be provided. The proposals would include a hierarchy of open spaces alongside retained assets including: a village green at the centre and entrance of the Site to open up views along Butcher's Lane; green corridors to catch the vista to the Church and to incorporate sustainable drainage measures; and a community orchard.
- 2.25 New footpath links would also be created, providing new connections from the existing settlement to the existing Public Rights of Way to the east and west of the Site. This will improve accessibility to the local footpath network for existing and future residents, provide new public open space for the community and provide a formalised walking route through to the playing fields and allotments.

Heritage

- 2.26 The Site forms the northern extent of the Boxford Conservation Area. There are no listed buildings on the Site itself but a number of Grade II Listed Buildings within proximity, including Sunny Bank which lies 6m east of the Site. St. Mary's Church, located to the south west, is a Grade I Listed Building.
- 2.27 The Concept Masterplan has been informed by specialist heritage advice and has been designed to ensure no detrimental harm is caused to the setting of the Conservation Area and nearby Listed Buildings, and ensures the protection of key views to and from St Mary's Church. To the north of the Site, a 'lost' orchard will be restored to frame the vista towards St Mary's Church.

Community Benefits

- 2.28 Development of approximately 50-55 dwellings at the Site has the potential to provide a range of benefits to the local community, including:
- 35% affordable housing, equating to between 17 and 19 affordable homes for rent or affordable ownership;
 - A mix of housing to meet local needs, in type and size;
 - All homes, including affordable housing, to be built to a very high quality, to reflect local design and to incorporate energy efficiency measures;
 - The 'opening up' of private land for community benefit with new public open spaces and walking routes for local residents to enjoy, including:
 - A new village pond to the south of the Site;

- A 'lost orchard' restored to the south of the Site as well as a proposed orchard to the north, framing the vista towards St Mary's Church;
- Formalised walking route to access allotments to the north;
- New public access to the recreation ground, play area and tennis courts to the north;
- New pedestrian and cycle access to the public footpath along the western boundary of the Site.
- Habitat and wildlife corridors, tree and hedge planting, providing biodiversity enhancement opportunities;
- Provision of financial contributions to community infrastructure.

Proposed Mechanism for Delivery

Site Promotion

- 2.29 Vistry Group welcome the Parish Council's consideration of the potential to bring the Site forward for residential development as part of the BNP.
- 2.30 This approach will allow for full consideration of the delivery of infrastructure and housing, in line with the needs of the local community.

Engagement

- 2.31 Vistry Group wish to proactively engage and work cooperatively with the Parish Council to support the emerging BNP and to involve the community in proposals for the Site. As per previous requests, we continue to welcome a meeting to discuss the initial proposals for land north of Butcher's Lane.
- 2.32 Vistry Group is committed to keeping the Parish Council up to date with the proposals as they develop and hope that this can be undertaken collaboratively with the Parish Council and wider community. As proposals evolve, engagement will also take place with key stakeholders, and the local community to obtain feedback to inform proposals for the Site.

3. SUPPORTING DOCUMENTS TO THE PRE-SUBMISSION BOXFORD NEIGHBOURHOOD PLAN

Boxford Neighbourhood Plan Site Options and Assessment Final Report (AECOM, August 2021)

- 3.1 AECOM published an appraisal of sites intended to aid the BNP Group in its site selection process in August 2021.
- 3.2 A 'traffic light' rating system is used in the report as an indicator of the suitability of a site for allocation. A 'red' rating indicates that the site is not appropriate for allocation, whilst 'amber' indicates that the site may be suitable in principle for full or part allocation subject to the resolution of identified issues or constraints. A 'green' rating identifies that a site is suitable.
- 3.3 Twelve sites were assessed in the report. No sites achieved a green rating. Three sites achieved an amber rating and the remaining eight sites were given a red rating. The eight 'red rated' sites were deemed unsuitable for allocation in the BNP either due to site constraints or the fact they have already received planning permission.
- 3.4 Land north of Butcher's Lane was included for assessment within the AECOM report. The Site was identified under its BMSDC Strategic Housing and Economic Land Availability Assessment (SHELAA) (October 2020) reference 'SS1128 Land west of Butcher's Lane, Boxford'.
- 3.5 The site conclusion at Table 4-1 on the AECOM report states:

"The site is not suitable for allocation in the Neighbourhood Plan.

SHELAA conclusions can be applied. There are also issues with telegraph wires and poles crossing the site and visual impact as the site sits on higher ground than the surrounding area. Furthermore, the site is proposed as a designated green space in the BMSDCJLP Pre-Submission (November 2020)."

- 3.6 There are a number of concerns with the conclusions being drawn from the AECOM report, which are discussed in turn below.

1. SHELAA Conclusions can be applied

- 3.7 It is concerning that AECOM are relying on the SHELAA conclusions. The Site was discounted in the SHELAA (Appendix E) for the following reason:

"No possibility of creating suitable access to the site. Development of the site would result in a loss of designated open space, which is either not surplus to requirements or could not be replaced locally."

- 3.8 There is no evidence that BMSDC undertook a full and proper assessment of the Site, and as a result land north of Butcher's Lane was discounted for incorrect reasons; the site does have a suitable access opportunity and the site does not comprise designated open space when applying the definitions within the Draft JLP.
- 3.9 Vistry Group have undertaken technical and environmental assessments of the Site to fully understand the Site's constraints and opportunities. These assessments have shown this to be a sustainable and deliverable Site. This includes technical highways advice, which has demonstrated that a suitable access to the Site can be achieved from Butcher's Lane.
- 3.10 Furthermore, BMSDC do not appear to have published any evidence base documents that justifies the proposed designation of the Site as open space. The land is in private ownership and does not currently have any formal public benefit. As such it is not appropriate for the Site to be designated as open space and Vistry Group is seeking to remove this designation from the Draft JLP. It is anticipated that the proposed designation may have been made in error, due to the proximity to the recreation ground and allotments to the north, and informal, unpermitted use by pedestrians. These concerns were raised through the examination of the Draft JLP, and were heeded by the Local Plan Inspectors, contributing to their decision that further assessment work is required to be undertaken.

2. Telegraph wires and poles

- 3.11 This is a known constraint that can be addressed as part of the detailed design process.

3. Visual impact

- 3.12 The SHELAA conclusions raise concern with the potential visual impact of the Site given that is higher ground than the surrounding area. This can be mitigated through a well thought-out and carefully planned development that fully considers and responds appropriately to the landscape and visual impact. How this has been considered in initial work undertaken by Vistry Group is demonstrated through the accompanying Vision Document (Appendix One). Further detailed assessments will continue to inform the emerging proposals, but it is evident from the work undertaken to date that a well-considered approach that is considerate and sensitive to any landscape and visual impacts, as well as other constraints, can be achieved.

4. Draft JLP green space designation

- 3.13 As stated above, the Draft JLP identification of the Site as proposed 'designated open space' is inaccurate. The Site does not fall within any of the four definitions of designated open space set out at Paragraph 16.03 of the supporting text to Draft JLP Policy LP30. This is most notably because the land is within private ownership, in agricultural use and is not open to the public. An appropriate strategy was not taken by BMSDC to designate the Site as open space, and there are errors in the methodology which mean the approach taken by the Councils is not justified and is unsound. On behalf of Vistry Group, Boyer is seeking for the open space designation error to be rectified through the JLP Examination process and as already noted above, these concerns were recognised by the Local Plan Inspectors.

- 3.14 With the above in mind, it is clear that AECOM have not made a full and proper assessment of the Site informed by publicly available evidence. They have relied upon the BMSDC SHELAA conclusions which are inaccurate, rather than undertaking their own full independent and objective assessment. From the conclusions they have drawn, AECOM do not appear to have read or taken into consideration the representations submitted by Vistry Group to the Regulation 19 Draft JLP consultation, which were in the public domain when the AECOM report was published in August 2021. It is also concerning that the BNP Group have not taken into account the specific concerns raised by the Inspectors at the JLP examination. Given that the same evidence base that has been discredited through the Local Plan examination was used to inform the BNP, further review should also be undertaken to inform the BNP.
- 3.15 It is also noted within the AECOM report that the proposed land use for the Site is recorded as 'unknown'. It is concerning that AECOM did not have this information and reiterates that AECOM were not fully aware of the evidence publicly available that has been submitted to date regarding the Site, and could not therefore, have undertaken a full and informed assessment of the Site.
- 3.16 The discounting of the Site on the basis of the AECOM report findings is not a robust approach and the Site is evidently less constrained than other sites that have been identified as potentially suitable for full or part development. Without undertaking a thorough and objective assessment of sites for allocation, the draft BNP cannot contribute effectively to sustainable development and does not therefore meet basic condition d.

Boxford Housing Needs Assessment Draft (AECOM, September 2020)

- 3.17 AECOM published a Draft Housing Needs Assessment (HNA) for Boxford in September 2020. The HNA was focussed on answering three research questions on the following topics:
- RQ1: Tenure and Affordability and the Need for Affordable Housing
 - RQ2: Type and Size
 - RQ3: Specialist Housing for Older People
- 3.18 In brief, the findings of the report state that Boxford lags behind Babergh and England in terms of provision of smaller dwellings with two or less bedrooms, with conversely higher proportions of larger properties with three or more bedrooms.
- 3.19 The report finds that approximately 28 new affordable homes are required over the plan period and recognises that this overall figure exceeds the housing need of 13 dwellings set out within the Draft JLP. It is stated that it is therefore unlikely that the BNP will be able to accommodate in full the identified affordable housing requirement.
- 3.20 In relation to specialist housing for older people, a range of 40-60 dwellings are required, which the report suggests should be treated as an upper, more aspirational target to be provided if other constraints allow. It is acknowledged that in practice much of this need may be met without the mainstream housing stock through adaptations and care provided in the

home and that Sudbury and Hadleigh may be more appropriate locations for specialist accommodation to accommodate the need arising from the Neighbourhood Plan area. Nonetheless, it is stated that a heavier emphasis should be placed on delivering bungalows.

- 3.21 Overall, the report recommends that a broad mix of housing is provided to include all sizes of dwellings with a focus on smaller dwellings and in particular affordable smaller homes.
- 3.22 Whilst the AECOM report is beneficial in researching focussed topic areas relating to affordable housing need, tenure type and size and specialist housing need, it does not appear to consider the overall local housing need in Boxford. On behalf of Vistry Group, Boyer undertook a review of local housing need in Boxford in January 2021. The full review is attached at Appendix Two. The review draws upon the Local Housing Need Assessment undertaken by Lichfields (December 2019) to support the application for up to 64 dwellings at Land East of Sand Hill (ref: DC/20/00330).
- 3.23 As set out in detail within Appendix Two, depending upon the local geography analysed and the basis of the calculation, the local housing need for Boxford is estimated to be a minimum of 79 dwellings and potentially 276 dwellings.
- 3.24 It is concluded that an appropriate local housing need target would be around the 115 dwellings shown by a local growth scenario. It is therefore evident that there is a current local housing need within Boxford and that new housing should be brought forward to meet this identified need.
- 3.25 It is clear that there is an identified housing need beyond that identified in the Draft JLP and this should be accounted for within the BNP. A larger development could successfully accommodate the housing need, with provision included for smaller affordable units and bungalows as identified in the AECOM report. The inclusion of Land north of Butcher's Lane as an allocation within the BNP provides an opportunity for a high quality development of a range of housing types and sizes with community benefits and it would provide the Neighbourhood Plan group with the control to help shape future development within the village, rather than being subject to speculative developments.
- 3.26 Furthermore, it is noted at Paragraph 234 of the AECOM report that it is recommended that the conclusions of the report should be discussed with Babergh District Council. It is not clear from the BNP whether these discussions have taken place other than one reference to affordable housing split at Paragraph 7.36 of the BNP.

Boxford Design Guidelines and Codes Final Report (AECOM, March 2021)

- 3.27 The production of the Boxford Design Guidelines and Codes Report (AECOM, March 2021) is welcomed in line with NPPF Paragraph 127 which states that *"Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers."*

- 3.28 In line with the NPPF (paragraph 128) it is important that the design guidelines do not become restrictive and allow a suitable degree of variety where justified.

Strategic Environmental Assessment (SEA) for the Boxford Neighbourhood Plan (AECOM, January 2022)

- 3.29 The Strategic Environmental Assessment (SEA) considers the likely effects of the emerging BNP, and alternatives, and is undertaken with a view to avoiding and mitigating negative effects and maximising positive effects. The Environmental Report must identify, describe and evaluate the likely significant effects of implementing the plan, and reasonable alternatives.
- 3.30 The report is firstly required to consider what has plan-making / SEA involved up to this point? The SEA notes that the BNP must be in general conformity with the strategic policies of the local development framework for Babergh and makes reference to the emerging Babergh and Mid Suffolk JLP. Whilst it recognises that the JLP is still being progressed, it is considered that the SEA underplays the level of further work and amendment that the Local Plan Inspectors have requested be undertaken in relation to the spatial distribution and site selection process to enable the JLP to be found sound.
- 3.31 This is significant given that to establish 'reasonable alternatives' for the Plan the SEA has relied on the same evidence provided through the Babergh and Mid Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA) (October 2020). As noted previously, the draft JLP site selection process has been discredited through the Local Plan examination, with the Inspectors acknowledging that there were clear errors in the assessment of sites, and this has resulted in a need for the JLP to undertake fundamental review of site selection and distribution. The site assessments used in the SEA can not therefore be relied upon.

4. BOXFORD NEIGHBOURHOOD PLAN SUBMISSION DRAFT

Vision and Objectives

- 4.1 The Vision and Objectives echo the principles set out within national planning policy though the NPPF and are largely supported.

Chapter 7 – Housing

- 4.2 National planning guidance states that “*Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale.*” (NPPG Paragraph 103 Reference ID: 41-103-20190509).
- 4.3 We are pleased to see acknowledgement within the BNP Submission Version (paragraph 7.5) that following the outcome of the BMSJLP hearings in December 2021, the ‘minimum housing requirement for NP Areas’ as set out in Table 04 of the submitted BMSJLP (November 2020) is to be treated as providing ‘indicative’ figures for Neighbourhood Plan areas.
- 4.4 This aligns with NPPF Paragraph 67, however, it is also right to recognised that, at this stage, the figures within the Draft JLP should not be relied upon. As has been acknowledged through the Local Plan Examination hearings in 2021 the housing requirement figures, site selection and distribution proposed through the draft JLP can not be found sound at this stage, and the Inspectors have requested that further fundamental analysis be undertaken. The Inspectors have also proposed that Spatial Plan policy SP04 (Housing Spatial Distribution) be deleted. As such, no weight can be given to the housing requirement figures for Neighbourhood Plan Areas set out in the Draft JLP, and it should be acknowledged that the further work being undertaken by BMSDC in progressing the JLP may lead to an alternative approach to distribution of housing.
- 4.5 Coupled with the proven local housing need in Boxford (see Paragraphs 3.22 to 3.24 above), the Neighbourhood Plan Group should look to take a proactive approach in identifying where there may be opportunities to exceed the requirements in the Draft JLP, such as through the allocation of the land north of Butcher's Lane, in order to meet the government's objective of significantly boosting the supply of homes (NPPF, paragraph 59).
- 4.6 Furthermore, in addition to acknowledging that the housing requirement figures from the Draft JLP are ‘indicative’, to further accord with the NPPF it should also be made clear that the overall housing need is based upon a minimum figure.
- 4.7 Table 2 of the BNP (Page 30) identifies the housing permissions that have been granted since 1st April 2018, suggesting (paragraph 7.10) that it can be demonstrated that the planned Local Housing Requirement for Boxford up to 2037 as identified in the Draft JLP has

already been met. This assumes that all these permissions will be implemented. It is optimistic to rely on all homes being delivered through outstanding planning permissions.

- 4.8 Other than 4 dwellings on the former nursery at Calais Street all the permissions relate to development of one new dwelling. As such, it is not considered that any infrastructure or wider community benefits will be generated and development of this nature adds additional strain on existing facilities, services and the highway network without providing any mitigation.
- 4.9 Boxford is identified as a Core Village, due to the range of services and facilities available. Core Villages are clearly recognised as sustainable locations for accommodating new development, and act as a focus for development in Babergh district.
- 4.10 The notion (at Paragraph 7.11) that the BNP is only considering “the potential for further specific small-scale growth within the parish either where it would contribute towards a specific identified housing need that is not being met by recent developments or where it would provide another specific community benefit identified in this plan” does not accord with the presumption in favour of sustainable development, which the NPPF states for plan-making means “promoting “a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects” (NPPF paragraph 11).
- 4.11 It is not therefore considered that the BNP meets basic conditions a) or d).

Policy BOX1 – Housing Strategy for Boxford

- 4.12 Policy BOX1 sets out the Housing Strategy which includes one allocation for 7 dwellings (and a village car park) on land at Stone Street. The BNP therefore exceeds the Boxford housing requirement by 7 dwellings. Whilst this is supported and the development will provide a much needed village car park, the housing strategy otherwise relies on speculative development of individual dwellings or small groups of houses within the settlement boundary being brought forward largely on an ‘ad hoc’ basis. As noted in previous representations, we do not consider this will enable the flexibility for Objective 1 to be met. Policy BOX1 should provide flexibility for housing on suitable sites outside the currently defined settlement boundary, that relate well to the existing settlement, where it is demonstrated that there is a proven local need. National planning guidance states that housing supply policies in the Neighbourhood Plans should take account of the latest and up-to-date evidence of housing need (NPPG paragraph 040 Reference ID: 41-040-20160211).
- 4.13 Despite discussion in the supporting text, there is no provision within policy BOX 1 (Housing Strategy for Boxford) that would enable new development to come forward to meet an identified level of housing need, other than affordable housing need, should the identified local housing need position change over the course of the plan period. This approach fails to accord with the Government’s objective of “significantly boosting the supply of homes”. It

should be noted that Paragraph 60 of the NPPF clearly states that “it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay” (NPPF, paragraph 60). The policy wording of BOX 1 should therefore be amended to provide a clear allowance for additional housing to be provided should local need be identified in any up-to-date local housing needs survey.

- 4.14 It should also be acknowledged that there are significant benefits to development on larger sites. In addition to Policy BOX 1A, Land north of Butcher's Lane should be included as a site specific allocation to meet a proven current local housing need. The Site is well related to the existing settlement and the development of the Site would bring considerable community benefit with the provision of new footpath links and open space, on land that is currently in private ownership, connecting development to the south with the playing fields and allotments to the north. Such community benefits are only feasible through the development of a larger site, whereas numerous 'ad hoc', smaller developments would not be able to bring the same benefits to the village. A larger site also provides the opportunity to offer a range of dwelling types to meet the differing needs of the community.
- 4.15 It is notable that Boxford has been allocated less development than other Core Villages. It is our view that where there are suitable sites available, the BNP should be planning for additional growth through formal site allocations. It is important for the Neighbourhood Plan to facilitate the provision of new housing to meet local housing needs and contribute to housing delivery both in the Neighbourhood Area and the wider district, to accord with the Government's objectives of the NPPF and to satisfy the requirements of the Draft JLP.
- 4.16 It is apparent from the BNP Site Options and Assessment Final Report (AECOM, August 2021) that the majority of sites considered were small scale and there is an absence of larger sites that have been previously promoted for development within Boxford. As set out within Section 3 of this representations submission, when a proper assessment of the Site at land north of Butcher's Lane is made, there are limited constraints to its development and none that can't be mitigated. Therefore, this Site should be included within the housing strategy as an ideal solution to meeting evidenced local housing need.
- 4.17 For the reasons set out above, it is considered that Policy BOX1 does not meet basic conditions a) or d).

Policy BOX 2 - Housing Mix

- 4.18 Policy BOX 2 states that the mix of new housing will be provided in accordance with the AECOM Housing Needs Assessment (October 2020). As noted in previous representations, it cannot be relied upon that this report will remain up to date for the Neighbourhood Plan period. We are pleased to see that the recommended amendment to the wording of BOX 2 has been included to clearly reference that housing need should be provided in accordance with the October 2020 Housing Needs Assessment, or any more up to date evidence.

Policy BOX 3 – Rural Exception Sites

- 4.19 Draft Policy BOX 3 and the strategy to support affordable housing provision through rural exception sites is noted. Given the identified affordable housing need of 28 dwellings over the plan period (AECOM Housing Needs Assessment Report), rural exception sites should not be relied upon as the sole affordable housing provision and the BNP should go further in ensuring that adequate affordable housing is provided. The most appropriate strategy for this will be through the allocation of a larger site. This approach also enables new affordable housing to be provided in a manner that better assists integration with the community, by blending different house types in a tenure blind development, rather than an isolated pocket of affordable houses. It is not therefore considered that approach presented through policy BOX 3 would enable Objective 1, or the social sustainability objective of the NPPF, to be met. It is therefore considered that Policy BOX 3 does not meet basic conditions a) or d).

5. SUMMARY AND CONCLUSIONS

- 5.1 These representations are submitted by Vistry Group in response to consultation on the BNP Submission Version Consultation (January 2022) under Regulation 16 of the Neighbourhood Planning Regulations.
- 5.2 As has been explained through these representations, having undertaken a detailed review of the consultation document, whilst Vistry Group are supportive of the Neighbourhood Plan, it is considered that the current draft CNP requires amendments to ensure it is in conformity to national planning policy and guidance. As it is currently drafted the BNP does not contribute to the achievement of sustainable development and therefore fails to meet the Basic Conditions 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).
- 5.3 The 'indicative' housing requirement for Boxford, as identified through the Draft JLP, is for just 13 dwellings across the plan period and the BNP makes just one allocation for 7 dwellings. As has been acknowledged through the Local Plan Examination hearings in 2021 the housing requirement figures, site selection and distribution identified through the Draft JLP could not be found sound and require fundamental review. As such, although they are noted as 'indicative', the housing requirement figures for Neighbourhood Plan Areas set out in the Draft JLP can not be relied upon, and it should be acknowledged that the further work being undertaken by BMSDC in progressing the JLP may lead to an alternative approach to distribution of housing.
- 5.4 As provided through these and previous representations, there is evidence of current local housing need within Boxford beyond that identified in the Draft JLP and this should be reflected in the emerging BNP to ensure that the BNP aligns with the presumption in favour of sustainable development by promoting "a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects" (NPPF paragraph 11). It is therefore evident that the BNP does not meet basic conditions a) or d). The allocation of land north of Butcher's Lane, Boxford for residential development of 50-55 dwellings would meet this identified need. The Site presents an available, suitable and sustainable opportunity to provide a mix of housing types including smaller and affordable units in accordance with need.
- 5.5 Development of the Site will provide community benefits and will create new footpath and cycle links, community orchard and open space, on a Site which would otherwise remain in private ownership with no public access. The Site will successfully connect existing residential development to the south with the allotments, recreation ground and play facilities to the north.
- 5.6 Land north of Butcher's Lane has been wrongly assessed in the Site Options and Assessment Report (AECOM, August 2021), that has been prepared to support and inform preparation of the BNP. As such, the Site has been discounted for future development for

unjustified reasons. As a thorough and objective assessment of sites has not been undertaken, the approach to future development cannot be said to contribute to sustainable development. It is considered that a further assessment of the Site should be undertaken, to take into consideration the information presented in these representations. The Vision Document at Appendix One emphasises how the Site is a suitable location for development that can be delivered in a sustainable manner. The scale of the proposed scheme means that it could provide a wealth of benefits to the local community, which other smaller scale developments would not be able to provide. It would therefore help to secure the investment and community infrastructure, as well as providing affordable homes locally, which will support the vitality of Boxford and connected nearby rural settlements.

- 5.7 Amendments and further refinement, in line with the suggestions and recommendations provided through these and earlier representations, should be made in order to ensure that the BNP satisfactorily meets the required Basic Conditions.
- 5.8 Vistry Group remain keen to work cooperatively with the Parish Council and District Council in relation to the emerging proposals for Land north of Butcher's Lane and are willing to provide further details to demonstrate the deliverability of the site.

APPENDIX ONE – VISION DOCUMENT

LAND NORTH OF BUTCHER'S LANE **BOXFORD**

VISION FOR A CONTEXT RESPONSIVE DEVELOPMENT

December 2020



Vistry Group



Linden
HOMES

Vistry
Partnerships

NEW ORTH

PREFACE



SITE
BOXFORD

Formed in January 2020, Vistry Group is a 5-star housebuilder, bringing together the award-winning, established developers - Bovis Homes, Linden Homes and Galliford Try Partnerships.

With a heritage that can be traced back to 1885, we are modern, forward-thinking and focused on delivering high quality new homes and sustainable developments that support a healthy and active lifestyle for our customers. Our vision is to be proud of every home we build and to ensure they are built by people who care.

The land north of Butcher's Lane presents an exciting opportunity to create a residential development around a network of green spaces that will integrate the new and existing communities. This will be a place which will provide much needed high quality family homes and affordable housing in a landscape led setting where people would want to live; a new neighbourhood which will contribute to wider infrastructure and community needs, provide publicly accessible open space, circular health trails, a community orchard, integrate with existing public footpaths, provide biodiversity corridors, green lanes, tree planting and much needed local homes for local needs.

Vistry Homes
Date: December 2020
Prepared by Boyer
Project code: 20.2032
Written by NB
Checked by AB

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www.vistrygroup.co.uk



1.0 THE OPPORTUNITY

Vistry Group is pleased to present this Vision Document to support a high quality landscape led development to the north east of Boxford ('the site'). We believe this site presents an excellent opportunity to create a well-designed, sustainable new neighbourhood for Boxford which will help deliver new homes and infrastructure with the added potential to create new public open spaces and recreation routes for Boxford.

The site historically formed part of the existing village and back gardens of plots. Today it is privately owned and not accessible to the community. It forms part of the Conservation Area, yet lies overgrown and un-integrated with its context. In this Vision Document we set out our concept proposals for this site which have been informed by our initial technical assessments. The concept proposals are underpinned by landscape and context led principles that will guide its design and development and most importantly help to re-integrate the site with its surrounding through a high quality context responsive proposal.

The document seeks to demonstrate that the site is both suitable and capable of delivering a well-designed new neighbourhood, providing a range of much needed homes for the local community in a highly sustainable location. Vistry Group will deliver high quality homes in a landscape led setting designed in close consideration to the wider countryside and setting of the existing village

We would encourage the Council to consider the characteristics of the site and the evidence supporting the development. In doing this, it is clear that the site is available, suitable and deliverable to help meet the housing needs of both Boxford and the District as a whole.





2.0 WIDER CONTEXT

The site is located on the north east edge of Boxford between existing residential development on Butcher's Lane and the recreation ground to the north. The village lies within the administrative boundary of Babergh District in the County of Suffolk.

Boxford is an English village and civil parish, situated approximately 600 metres north of the A1071 which runs between Newton and Chantry in Suffolk. Boxford lies in the south-west of Suffolk, approximately 8km west of Hadleigh and 9.6km east of the market town of Sudbury. Sudbury Train Station is served by a rail service operated by Greater Anglia. The site is bound by Butcher's Lane to the east that links to the village centre in Broad Street to the southwest and further north to the adjoining village of Horner's Green.

Boxford is situated in the valley of the River Box, which flows south-eastwards from its rising near the Waldingfields to eventually join the River Stour just below Thorington Street in the parish of Stoke by Nayland. The plan below shows the location of the site within the wider regional context, with a particular focus on links to major conurbations for employment purposes.



Sudbury Station



Boxford Primary School



St. Mary's church, Boxford



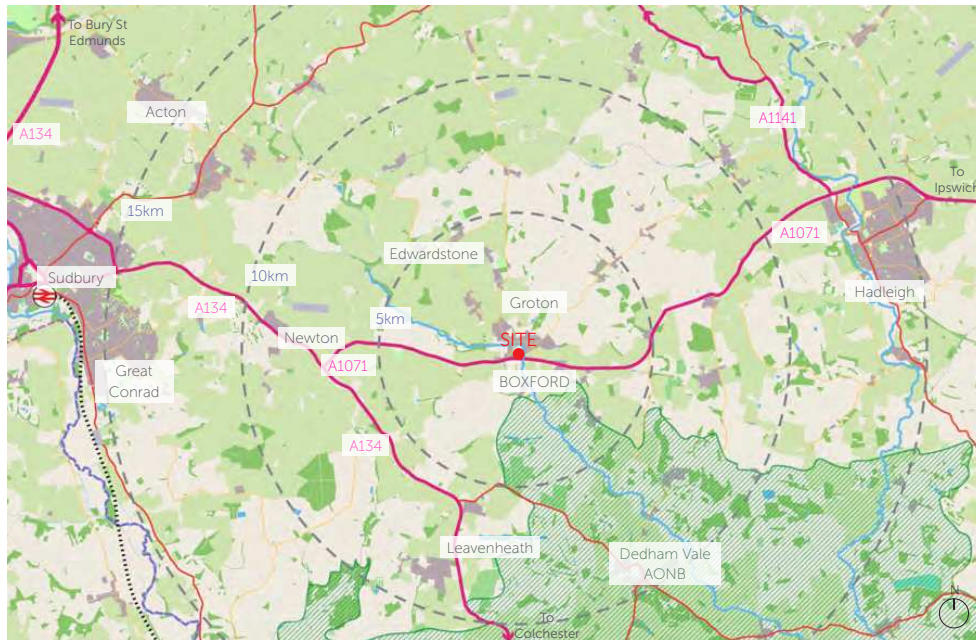
Village Hall



Local shops



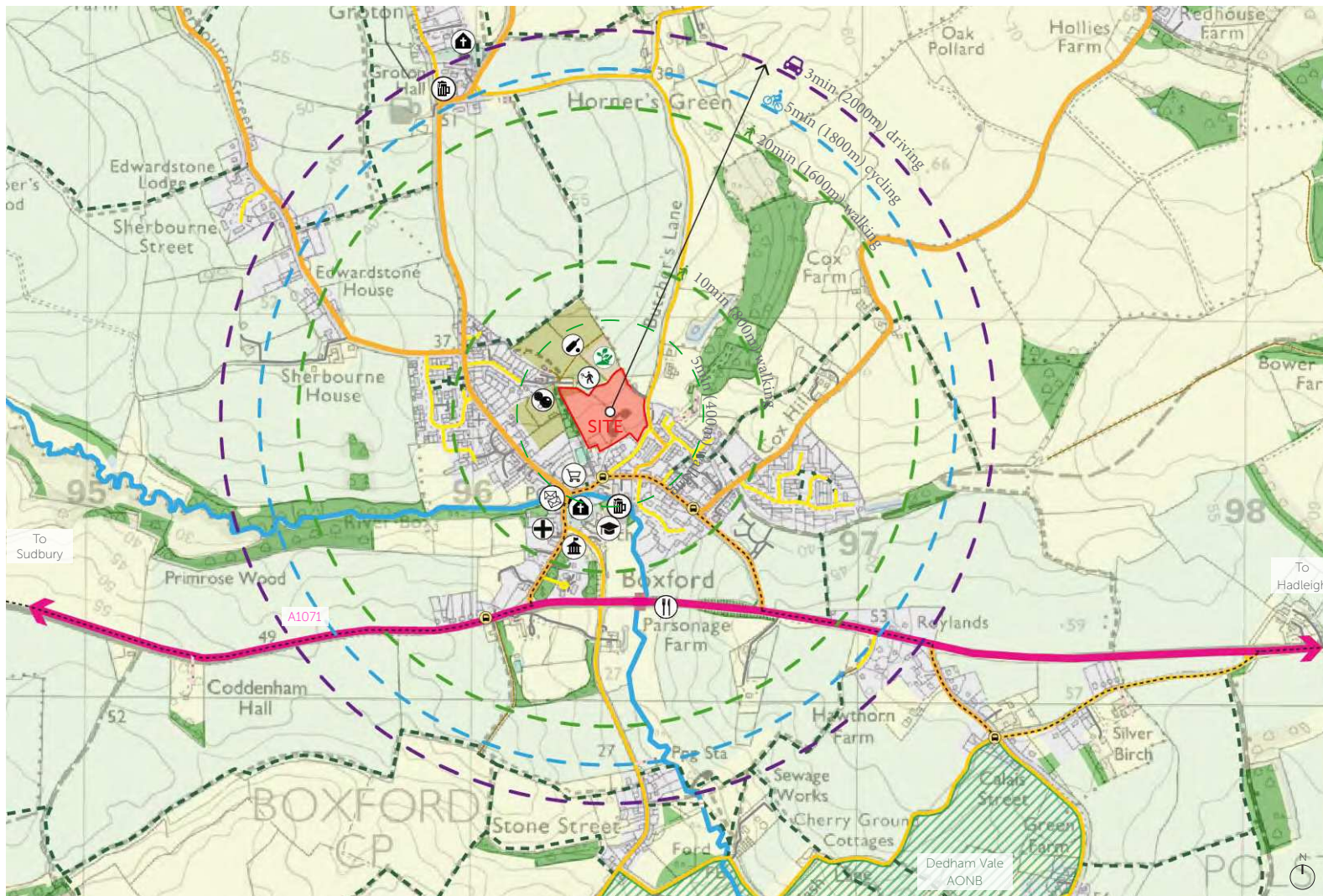
Local bus service connecting to Sudbury, Hadleigh and Ipswich



Site Location in the wider regional context



3.0 CONNECTIVITY



The plan sets out the public transport connections, education, healthcare, employment, retail and leisure facilities close to the site, demonstrating the connectivity of the site and its potential to support a new sustainable residential neighbourhood.

Key

- Site area
- Primary road
- Secondary road
- PRoW - Footpath
- Bus route
- Bus Stop
- 10min/20min walking distance
- 5 min cycling distance
- 3 min drive catchment
- School
- Shopping/Retail
- Village Hall
- Church
- Restaurants/Pubs
- Post office
- Pharmacy
- Playing fields
- Bowling greens
- Tennis courts
- Allotments

Accessibility Plan



4.0 SITE APPRAISAL

The site is currently comprised of a single agricultural field which is accessed from the south east corner on Butcher's Lane, near the junction with Ash Street. It lies on a south east facing slope on the northern side of the River Box and to the west of a small tributary stream which runs in a southerly direction to the east of Butcher's Lane. The site's highest point at the north west corner is at approximately 38m AOD falling to 28m AOD in the south east. The north east boundary is delineated by hedgerow & trees beyond which is Lynfield, a private property.

Mature hedgerow and trees follow the northern boundary, beyond which lies open ground within the Boxford Playing Fields. A car park play area, tennis courts and allotments are located to the north of the site. The eastern boundary follows Butcher's Lane and is delineated by an area of thick hedgerow and trees on the roadside banks. The south western corner is marked by post and rail fencing. The southern boundary abuts the rear gardens of properties along Butcher's Lane, including a number of Grade II listed buildings.

Along the western boundary, public footpath [W-147 008/X] provides pedestrian access from Butcher's Lane to the Boxford District Bowling Green (adjacent to the site) and the Playing Fields. The lane is sunken with a hedgerow with some mature trees forming the boundary with the site. An area of dense mature trees and the public footpath separates the site from the rear gardens of listed buildings along Swan Street. To the north western corner of the site is a suburban expansion of the village. The urban area of Boxford extends roughly to the north west along Swan Street, south along School Hill and east along Ellis Street/Cox Hill.



Site location plan



Ash Street to the south of Butcher's Lane



Butcher's Lane looking north east



Sunny Bank, Butcher's Lane, Grade II Listed



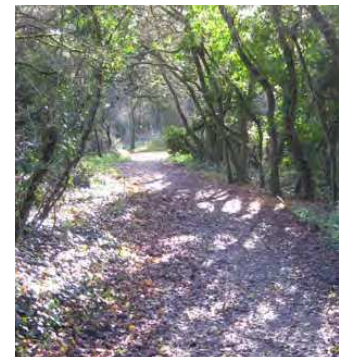
Lynfield, north of site



Boxford allotments



Boxford playing fields/playground



Sunken public footpath



5.0 LANDSCAPE CONTEXT



Landscape characteristics plan

Boxford lies to the north west of the Dedham Vale Area of Outstanding Natural Beauty (AONB). The Special Landscape Area washes over some of the village in relation to Box Valley and is effectively an extension of the AONB to the south east. The site lies approximately 440m east of Primrose Wood County Wildlife Site (CWS), although not visually or physically connected to the CWS. In the wider context, the site is part of the Rolling Valley Farmlands Landscape Character Type. In the immediate context, it forms the northern extent of the Boxford Conservation Area.

Due to the sloping nature, there are open views from higher ground in the northern part of the site across the Box Valley to the south. Although the views are predominantly wooded, with trees along the A1071 Boxford Lane forming the skyline, rooftops of houses within the village are visible along with some areas of open arable farmland. In these views the modern built development at Ash Street and Fen Street are visible, as well properties on the southern side of Butcher's Lane. Views towards the listed buildings that back onto the south western corner of the site are restricted by strong garden vegetation, however there is a clear vista to the Grade I listed church from the north of the site. Views to the east of the site is framed by the individual residential property - Lynfield. Views to the west are screened by a hedgerow with individual mature trees which line the public footpath on the western boundary. Views to the north are contained by strong vegetation to the car park, play area, tennis court and the allotments. Views of the site from the wider landscape are restricted with screened vegetation along the site boundary.



View looking north west towards the site from Ash Street/Butcher's Lane Junction



View looking south from top of site



View looking south east towards the site from the playing fields



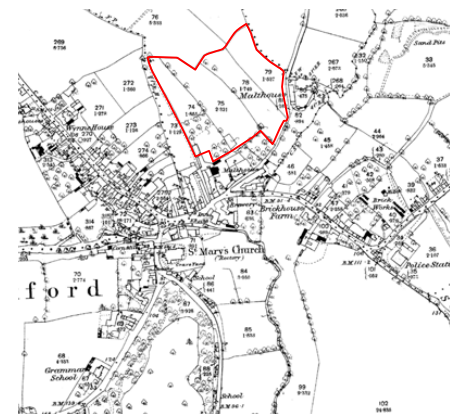
6.0 HERITAGE CONTEXT



Heritage characteristics plan

The site is within the northern part of the Boxford Conservation Area. In origin, Boxford is a linear village set around the ford of the River Box. The village lies mainly along the arc of the former A1071, crossing the river to the market place, near the Church of St Mary's, as well as along Swan Street. The historic built form is generally located close to the edge of the road(s) and comprises a mixture of timber framed and brick buildings. The village also has large areas of more modern development to the north and east including development within the conservation area. The historic map of 1886 provides an indication that the site formed parts of linear fields stretching back from Butcher's Lane. The plot boundaries were quite prominent, but have since been removed. The 1926 map also provides indication that an existing orchard may have existed to the south western corner of the site.

There are no listed buildings on the site itself. The Grade II listed Sunny Bank lies approximately 6m east of the site, across Butcher's Lane, but is mostly well-screened from the site. Also, along Butcher's Lane, approximately 40m south of the site are the Grade II listed 4 and 6 Butcher's Lane, the Maltings and Kemball House, which have some intervisibility with the site. There is also a glimpse through the passageway of Kemball House to the site from Butcher's Lane. There are a number of listed buildings along Broad Street to the south and Swan Street to the west of the site, views from these listed buildings are partially screened by outbuildings, walls and landscaping in their rear plots but some glimpsed views to the site are possible.



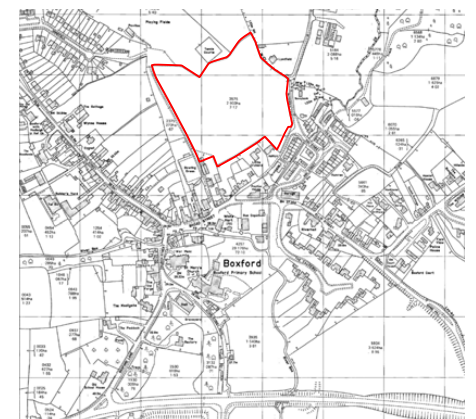
1886 Historic map



1926 Historic map

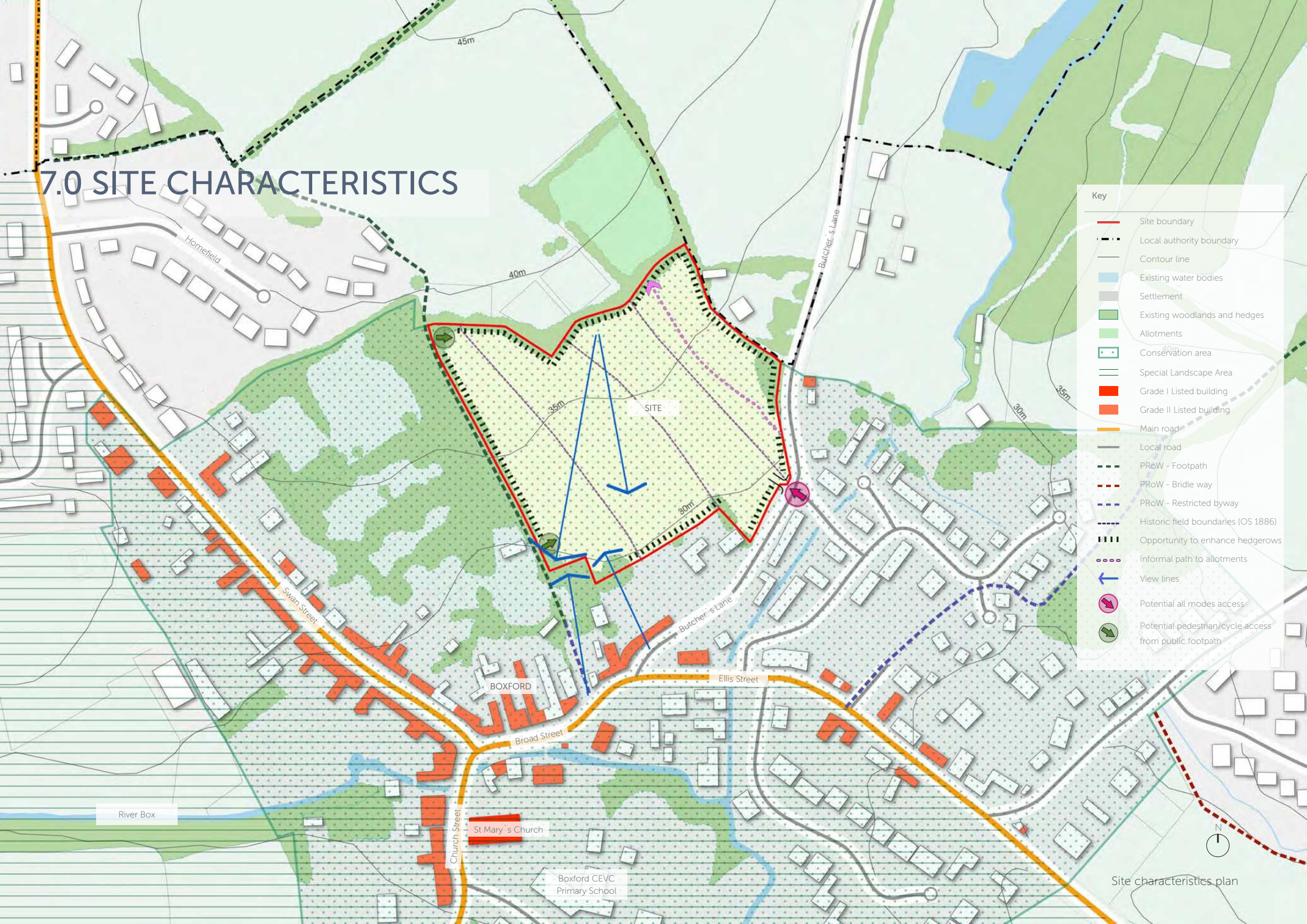


1971 Historic map



1986 Historic map

7.0 SITE CHARACTERISTICS



Key	
	Site boundary
	Local authority boundary
	Contour line
	Existing water bodies
	Settlement
	Existing woodlands and hedges
	Allotments
	Conservation area
	Special Landscape Area
	Grade I Listed building
	Grade II Listed building
	Main road
	Local road
	PRoW - Footpath
	PRoW - Bridle way
	PRoW - Restricted byway
	Historic field boundaries (OS 1886)
	Opportunity to enhance hedgerows
	Informal path to allotments
	View lines
	Potential all modes access
	Potential pedestrian/cycle access from public footpath

Site characteristics plan



River Box

45m

40m

35m

30m

30m

35m

BOXFORD

St Mary's Church

Boxford CEVC Primary School

Homefield

Swan Street

Church Street

Broad Street

Ellis Street

Butcher's Lane

Butcher's Lane

SITE



8.0 UNDERSTANDING SPATIAL VERNACULAR TO INFORM PROPOSALS

With the understanding of the setting and unique characteristics which surround the site at the northern edge of Boxford, existing spatial layout patterns of the village have been analysed to create and evolve a context response design response.

In producing this study, considerations outlined in the Boxford Conservation Area Appraisal have been incorporated. This study will act as a toolkit, inform design proposals and shape a high quality place that is informed by the local grain and uniqueness of Boxford in its original form and as the village has grown. The study shows an understanding of morphological growth of Boxford, assessment of layout and form along with spatial and landscape patterns that frame the buildings in the background or foreground. These principles will be used to inform how the masterplan evolves following engagement with local stakeholders.



The historic maps have shown that the village has a linear structure with Broad Street very much forming the central space of the village. The buildings on the north side are very urban, sitting tight on the back of pavement edge, whilst those on the south side are set back with front gardens both above and beyond the river flowing through the village.



Boxford Conservation Area, Conservation Area Appraisal



Image A

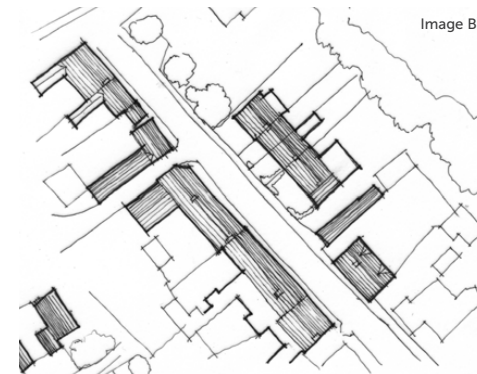


Image B

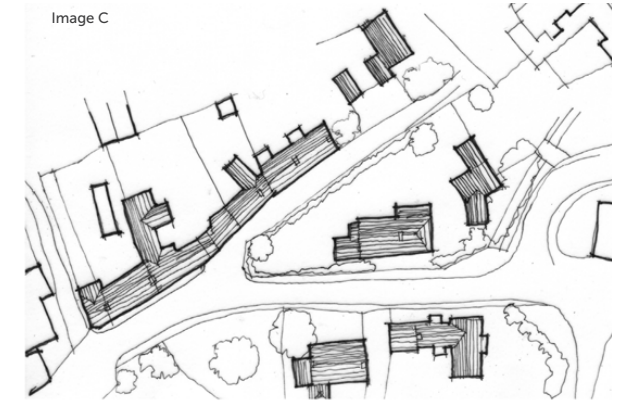


Image C



Variation in built form and enclosure as settlement evolved over the years at Boxford

At the west end of Broad Street, Swan Street heads off north-westwards gently uphill continuing the urban feel with its buildings, whereas Church Street heads southwards across the river, built up on the west side, but to the east opening out into the green space of the churchyard. Boxford's historic development has mostly been one plot deep along the roads and lanes that meet there. Over the years, a number of small estates have been built filling in areas which formed the backland of existing properties. The site presents a similar scenario without intruding into the historic fabric. The effectively radial system of roads is unique to Boxford and is augmented by a number of footpaths out into the countryside to the north and east. Images above show some layout patterns; **Image A** above shows an example of gable frontage, with garden fronting on the road side, with side entrance and parking. **Image B** above shows a variation in urban grain, with most dwellings built at the back of pavements and a terrace with short front gardens. Both images are from Swan Street. **Image C** shows a ribbon urban grain, with modest traditional structures built directly onto the lane and larger and properties built with setbacks from the street. (Broad Street and Butcher's Lane)



Image D



Traditional structures built directly on to the lane at the back of narrow pavement, overlooking a private green space in the core of the village (Butcher's Lane)

Image E



Dwellings built at the back of pavements and lane entrance extenuated with chamfered frontage (Swan Street)

Image F



Image G

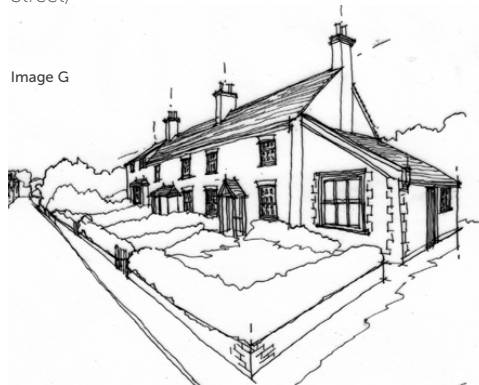


Image F (left) - Close relationship of gables on narrow lanes, minimal pavements and roadside gardens

Image G (above) - Example of terracing with garden fronting on the roadside, with side entrance and parking (Swan Street)

The key theme and inference gathered from the spatial vernacular study is 'variety' in streetscene and enclosure. Even with a nucleated structure, Boxford includes streets with high enclosure where plots are built on to edge of pavements, generally attached to each other with varying form and silhouette. In contrast the village also includes garden streets with lower degree of enclosure and plots set behind front gardens or overlooking green space with a pond. Form is more consistent and unifying here creating a cohesive street scene. It is this hybrid character that the proposals will seek to incorporate and shape further.





9.0 VISION

Vistry Group will deliver an attractive and sustainable new neighbourhood that the existing and future residents of Boxford will be proud of and in which people will aspire to live. The new development will be complemented with a network of green spaces that will be accessible to the existing and new communities, framed by high quality new homes. In order to deliver the vision, the proposed scheme will adhere to the following principles:

A balanced, vibrant neighbourhood

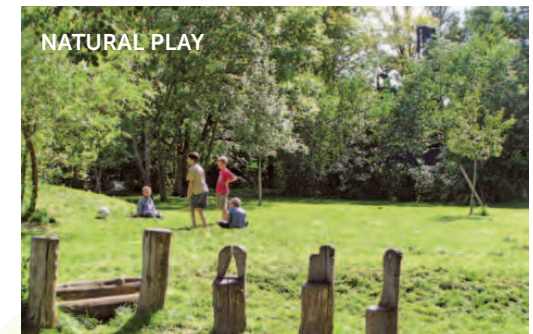
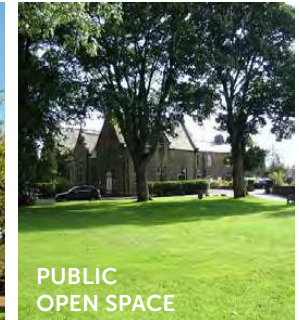
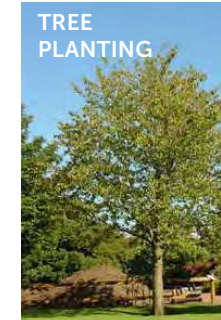
The new neighbourhood will create a thriving new neighbourhood on the edge of Boxford which will act as the northern entrance to the village and will include a variety of new homes to meet local needs, from those seeking to access the housing market, family and affordable homes along with housing options for the elderly.

A high-quality place

The new neighbourhood will provide a strong identity, but one which respects the local context and becomes an integral part of the village. It will incorporate well designed new homes which reflect local building styles and materials. Houses will be set within a green infrastructure network which will help to create an attractive place by retaining and enhancing existing landscaping and incorporating a variety of green spaces. These will provide opportunities for recreation and biodiversity enhancement as well as helping to create a transition to the wider countryside.

A sustainable accessible neighbourhood

The new neighbourhood would be located with good connectivity to Boxford village centre, nearby villages and Sudbury, making it accessible by a range of sustainable transport options. The proposal would provide opportunities for improvements to the existing public footpaths and a network of natural walking and cycling routes including circular health trails to appreciate nature and landscape and promote healthy and active living. A permeable and legible network of well designed streets will be incorporated within the scheme providing an attractive neighbourhood which connect to the wider footpath network and onto the nearby village centre. Existing pedestrian and cycle linkages within and outside the site can be enhanced to integrate the new community with the rest of the village and encourage residents and workers to access the site by means other than private vehicles.





10.0 DESIGN PRINCIPLES

A layering of the following evolving design principles have shaped the evolving concept masterplan.



PRINCIPLE 1 - A LANDSCAPE LED SETTING

The development would retain and strengthen the existing landscape assets around the site boundary. Green links would be also be created along the northern, north west and western boundary. The proposals would include a hierarchy of open spaces alongside the retained assets. This would include -

- **Entrance Pocket Green** - A pocket green at the entrance to open up views to Butcher's Lane with low height planting complementing the existing open character of the lane mirrored with open-ness of the listed building lawn. Proposed pond will act as a village pond and perform a multi-functional role as sustainable drainage measure, provide habitats for bio-diversity and bring the community together.
- **Green Corridors** - A wide green corridor provided to connect the northern high point and frame the vista towards St. Mary's church. The southern green corridor would incorporate sustainable drainage measures in the form of basins or swales.
- **Play and Community Orchards** - An area of community orchard would be located at the southern part restoring the lost orchard along with new natural play space and orchards to the north.

PRINCIPLE 2 - PERMEABLE NETWORK OF ROUTES

The **primary point of access to the site is proposed off Butcher's Lane** following technical highways assessment. This would enable a safe access to the site for all modes.

There would be opportunities to **provide pedestrian and cycle links to integrate the development** with the village and the **existing public footpath** running along the western boundary of the site. Similar soft modes link will also be provided to access the existing playing fields and tennis courts to the north. The existing pedestrian track from Butcher's Lane to allotments will be formalised to create a safe and accessible route for all.

A **network of streets will be integrated** within the proposals to promote a permeable and legible development. **Streets will be designed as places** and aimed to promote circulation on foot or by cycle. The design of streets **will vary in character** from tree lined green streets to more enclosed routes

A **circular trail** would be incorporated within the design proposals. This would vary in character and range from more formal footpaths along lanes to softer no-dig routes along the proposed green corridors and board walks or decks along the southern part of the site. Safe crossings will be provided across the development.

PRINCIPLE 3 - SPATIAL CHARACTER

The proposals have been informed by the analysis work carried out on the **spatial layout patterns of the local vernacular**. This has been incorporated and will create **variation in streetscene, enclosure and set back**. The variation will range from **tree lined green streets** where houses will be set back behind a front garden. In the centre of the site this careful disposition of plots will create a **vista corridor and frame views towards St. Mary's Church**. At other parts of the development, this variation will create interest and **surprise in the street experience**. Built form will be more unified along the green streets drawing the eye along the view frame.

The second variation will be in the form of **more enclosed streets** with variation in enclosure and paving texture. Plots will have **minimal setback from the street** and this will create pinchpoints and allow a different visual experience.

The **combination of pinchpoints and opened up views lined by trees or landscape in the foreground** will reflect the spatial form of the existing village and shape into a context responsive proposal integrating the proposed with the existing village.



11.0 CONCEPT MASTERPLAN



KEY

- 1** Access from Butcher's Lane and entrance green framed by village pond, acting as the northern entrance to the village
- 2** Key buildings framing routes, views and as vista stoppers establishing a legible framework
- 3** Lost orchard restored to the south along with proposed orchard to the north to frame vista towards St. Mary's Church
- 4** Attenuation basins as part of sustainable drainage designed towards bottom of the site creating a further setback of development edge from gardens of listed buildings
- 5** Formalised walking route to access existing allotments
- 6** Access to Boxford Playing Fields/Tennis Court
- 7** Pedestrian/cycle access from public footpath to the west of the site with additional vegetation along western boundary to reinforce green link
- 8** Enclosed streets creating higher degree of enclosure as per local spatial pattern
- 9** Garden streets and edges including plots with front gardens as per local spatial pattern

LAND USE	Hectares	Acres
Gross site area	2.86	7.07
Residential development area including roads	1.43	3.53
Open space provision	1.43	3.53
Average density (dph/dpa)	35-38.5 DpH	14-16 DpA
Estimated number of new homes	50-55	
Community Orchard	0.18	0.44
Amenity/natural green space	1.11	2.74
Parks & recreation	0.12	0.30
Play space (children & youth)	0.02	0.05
Overall open space required	0.288	0.71
Overall open space provided	1.43	3.53

WORKING WITH YOU

Boxford as a village offers the best of both worlds. With its sustainable location, excellent connectivity and unique setting, this is an ideal location to create a context responsive and beautiful development. Vistry Group has a track record of delivering similar places.

Policy SP04 of the Local Plan sets out the Council's approach to housing spatial distribution, and identifies 1,169 new homes in Babergh's fifteen Core Villages, but none of these are at Boxford. Boxford is a sustainable Core Village and is capable of accommodating sustainable growth.

The land north of Butcher's Lane was originally part of the settlement and comprised of back gardens to existing plots. Today it has an edge of settlement character, is in single private ownership under the control of Vistry and is available, viable and deliverable. The proposals provide the opportunity to open up the land for public use, create a landscape led and high quality development that will shape a sensitively designed entrance to the north east of Boxford, formalise walking routes to access recreation areas to the north and in addition provide publicly accessible open space on this site instead of loss. The proposals will make significant contributions to the existing community needs and infrastructure and create a context responsive beautiful setting to the north of this Suffolk village.

Vistry Group would welcome the opportunity to engage with stakeholders, Boxford Parish Council and the community of Boxford to collaborate and shape the emerging proposals for the site.



Development benefits

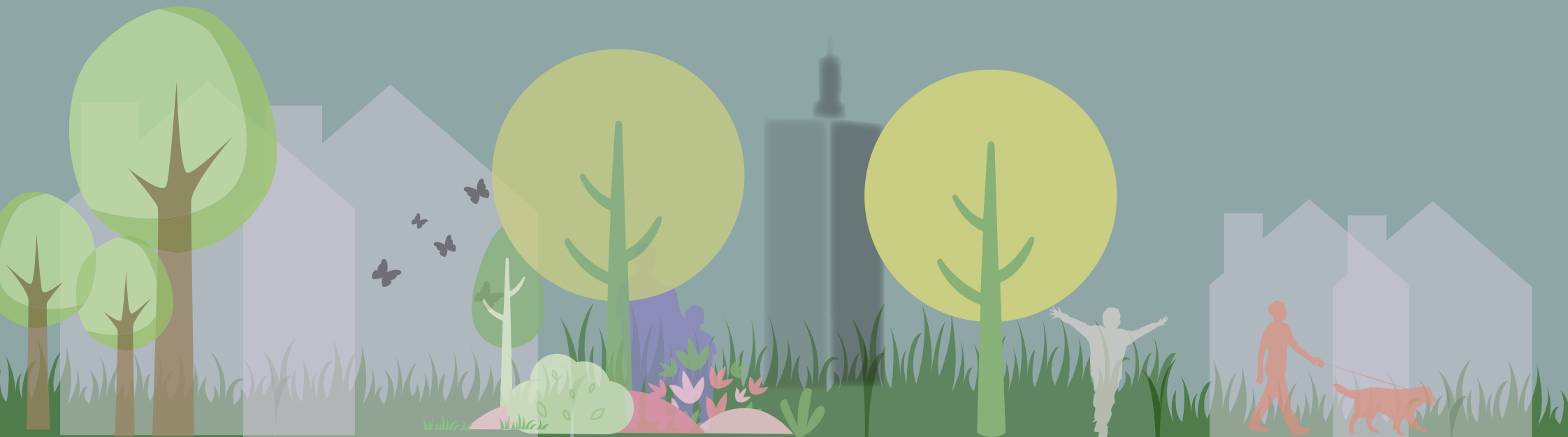


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APPENDIX TWO – LOCAL HOUSING NEED

Review of Local Housing Needs for Boxford

January 2021

Introduction

1. Boyer (Development Economics) on behalf of Vistry Group has prepared this brief review in connection with their land interest on the north east edge of Boxford at Butcher's Lane.
2. Vistry Group's vision for their site is to deliver an attractive and sustainable new neighbourhood that the existing and future residents of Boxford will be proud of and in which people will aspire to live. The new development will be complemented with a network of green spaces that will be accessible to the existing and new communities, framed by high quality new homes.
3. Vistry are promoting the site through the Local Plan process and at the end of 2020, Boyer submitted representations to the Babergh Mid Suffolk District Councils (BMSDC) Reg 19 (Pre-Submission) Joint Local Plan (JLP) consultation. Boxford is a 'Core Village' and therefore identified in the existing and emerging Local Plan as suitable for appropriate growth (the draft JLP proposes to allocate 28% of new housing to Babergh Core Villages). Despite this focus for housing, there is only one proposed allocation for Boxford in the draft JLP (5 dwellings in Boxford Calais Street away from the main village).
4. A Local Housing Need Assessment has previously been prepared in relation to a development proposed by Catesby Development Land Ltd for the erection of up to 64no. dwellings at land to the east of Sand Hill, Boxford¹. The assessment prepared by consultants Lichfields in December 2019 found inter alia that:
 - Boxford is a Core Village in Babergh providing a good range of day-to-day services (including shops and a school) and serving a surrounding area which encompasses 14 smaller villages and the countryside (Boxford's cluster).
 - In Boxford and the surrounds, the main housing stock provision is large, owner occupied homes and there is a relatively low amount of affordable housing.
 - Houses in Boxford command significant price premiums when compared with similar types of housing across the district; and there are acute house price and rental affordability problems across Babergh as whole and in Boxford itself.
 - Demographic data shows a high rate of concealment amongst young families in the local area (ie young families living within other households).
 - Boxford's cluster has had low levels of housing development over the last 15-20 years and this is likely to have contributed to affordability, household concealment and limited diversity of housing stock.

5. Based upon their research and analysis in 2019, Lichfields concluded:

'...caselaw has established that in the case of Core Villages 'local' needs are those arising in the village and its cluster (and perhaps the areas immediately adjoining). Looking at the whole of the Boxford cluster, the shortfall is even greater. At an absolute minimum c.120-150 dwellings are needed solely to meet demographic needs arising in the cluster, albeit this fails to

¹ Outline planning permission was recently (11/12/2020) granted for up to 64 dwellings on land to the east of Sand Hill, Boxford (DC/20/00330)

factor in an uplift for market signals and would not be consistent with the district-wide assessment of need. Accounting for such an uplift would imply a shortfall of c.230-280 dwellings to 2031 on a 'bottom-up' basis in the whole cluster and c.260-c.270 on a 'top-down' basis across the whole cluster.'

6. Boyer's review of local housing need examines the key inputs and analysis presented in the Local Housing Need Assessment prepared by Lichfields to assess whether the 2019 work and its overall conclusions remain valid.

Policy and Legal Background

7. Having reviewed the policy and legal background set out in the Local Housing Need Assessment prepared by Lichfields we consider there has been no material change in relevant policy or case law.
8. The Adopted Plan for Babergh remains the Babergh Core Strategy 2011-31, adopted in February 2014.
9. As mentioned above, the emerging JLP has reached the Reg 19 (Pre-Submission) consultation stage. The emerging JLP was at the Reg 18 stage when Lichfields prepared their Assessment and whilst it has advanced, the draft JLP still has limited weight.
10. We are not aware of any more recent caselaw in respect of local housing need and village clusters that revises the judgment in *East Bergholt Parish Council v Babergh District Council v Paul Bernard Aggett, Sarah Jane Aggett [2016] EWHC 3400 (Admin) December 2016*. This judgment established that "*local housing need in Policy CS11 means housing need in the village and its cluster, and perhaps in areas immediately adjoining it*". This reflects the role that core villages play in their functional clusters.

Characteristics of Boxford

11. Section 2 of the Lichfields Local Housing Need Assessment (2019) provides a comprehensive contextual review of Boxford village, describing its function; population and demographic characteristics; existing housing stock; and house prices, residential rents and affordability.
12. Boxford as a Core Village, benefits from convenience stores, a post office, pubs, a primary school, small scale employment, village hall, GP surgery, peak time bus services, recreation grounds and allotments².
13. As reported by Lichfields (2019), the 2017 estimated population of Boxford Parish was 1,295. The latest parish population estimate is 1,327³. The Parish population exhibits a higher proportion of persons aged 65 plus and lower proportion of persons aged 16-64 (economically active age banding) compared to the Suffolk and national averages.
14. In terms of housing stock and proportion of dwelling types, the latest (January 2021) information for the Parish from the Suffolk Observatory⁴ shows the following:

² Babergh District Council Settlement Hierarchy Review Paper July 2019

³ Data from the Suffolk Observatory -

<https://www.suffolkobservatory.info/population/report/view/62646f73d23e489098a5cdad7a116eed/E04009072/>

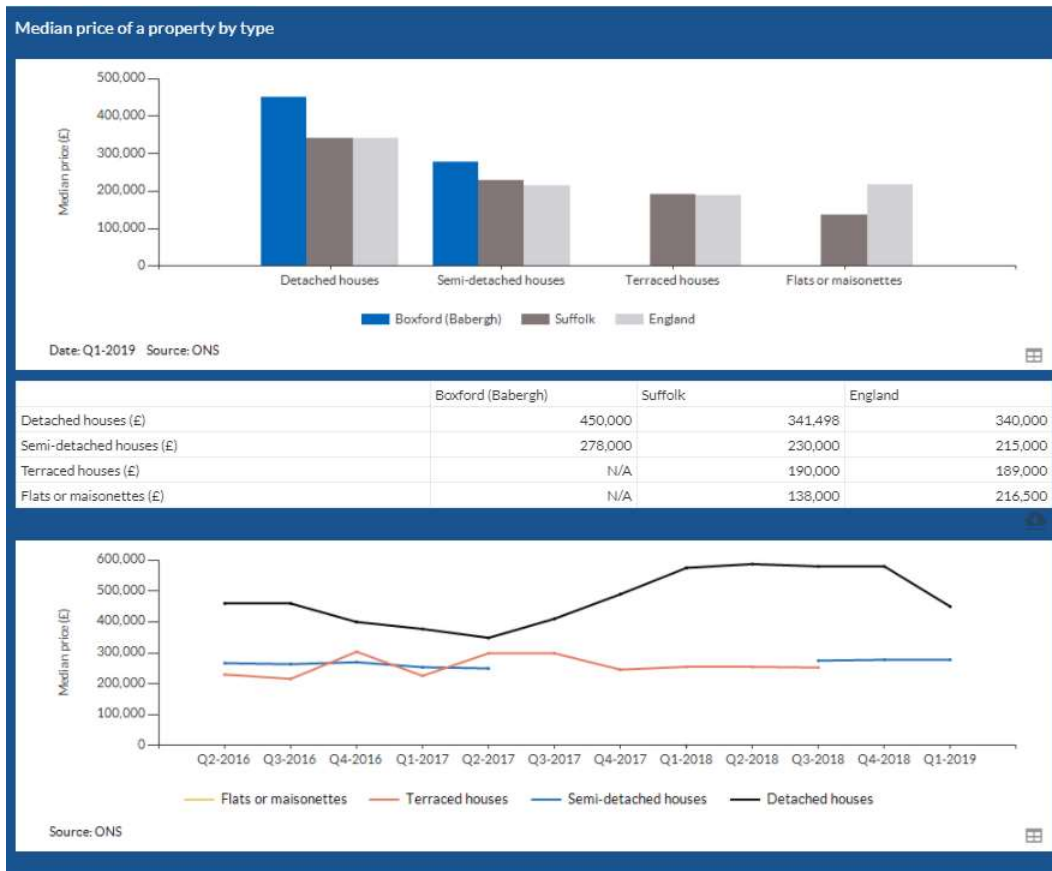
⁴ <https://www.suffolkobservatory.info/housing/report/view/314a500fc4714e6a84792a85840604f9/E05007078>

Dwellings by Type 2019	Boxford (Babergh)		Suffolk		England	
	Count	%	Count	%	Count	%
Bungalows	100	9.9	59,150	17.2	2,281,310	9.3
Flats/maisonettes	60	5.9	42,970	12.5	5,665,030	23.2
Terraced houses	200	19.8	82,150	23.9	6,427,560	26.3
Semi-detached houses	220	21.8	74,970	21.8	5,801,880	23.8
Detached houses	410	40.6	78,470	22.8	3,812,000	15.6

Data Source: 2019 Land Registry Data

Dwellings by Type	Boxford (Babergh)	Suffolk	England
Percentage of bungalows 2019	9.9	17.2	9.3
Percentage of flats/maisonettes 2019	5.9	12.5	23.2
Percentage of terraced houses 2019	19.8	23.9	26.3
Percentage of semi-detached houses 2019	21.8	21.8	23.8
Percentage of detached houses 2019	40.6	22.8	15.6

15. Lichfields highlighted in their 2019 assessment the issue of affordability of homes in Boxford and this is in part due to the stock of dwellings being heavily skewed by a very large proportion of detached homes. The figure below extracted from the Suffolk Observatory website (January 2021) shows the median price of a property by type in Boxford compared to Suffolk and England.

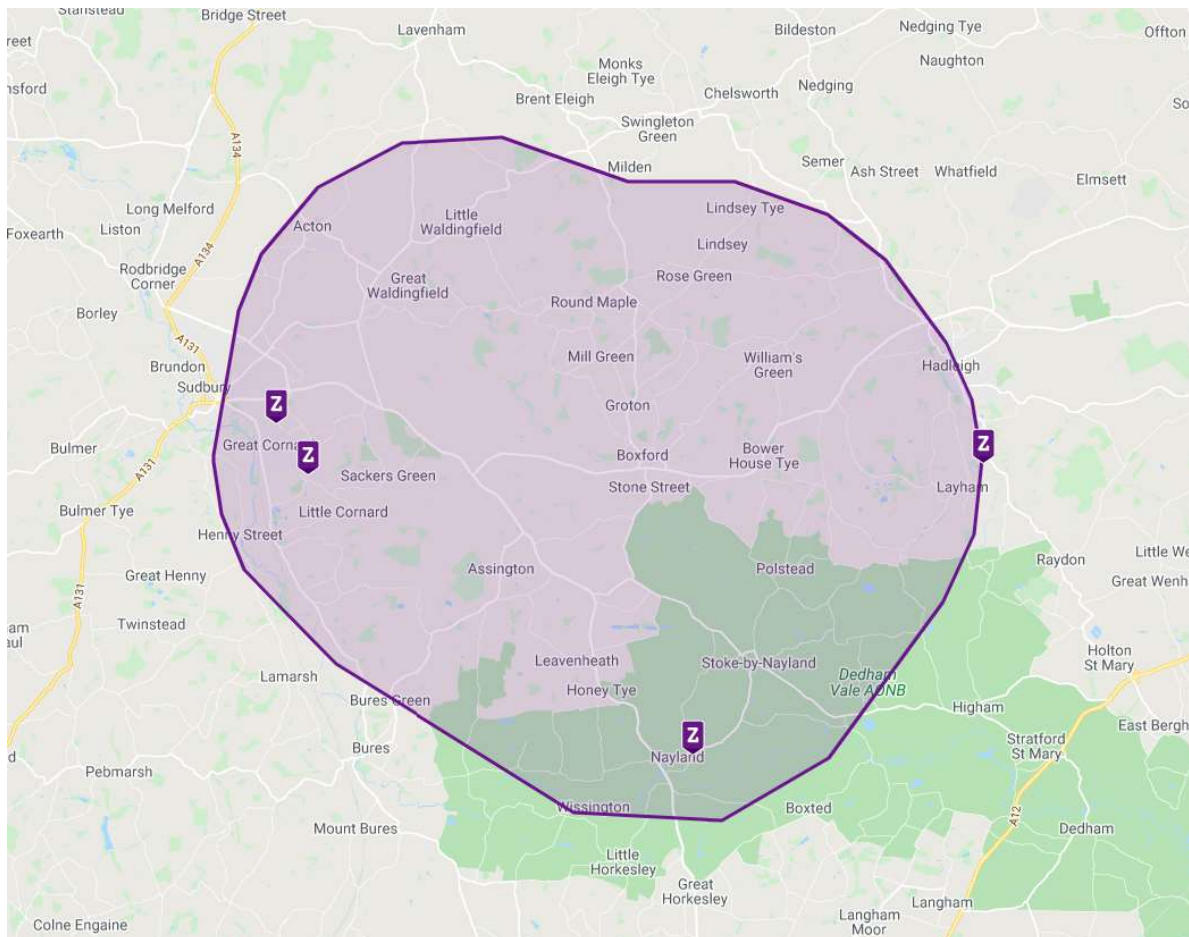


16. House prices in Boxford as reported in the 2019 Lichfields assessment remain significantly higher than median prices in Suffolk.

17. Lichfields considered the residential rental market in Boxford in their Local Housing Need Assessment (2019) and advised that:

'...a review of properties for rent as of August 2019 shows a total of 8 dwellings in the cluster available for rent, with 2-beds ranging from £740 to £825 pcm and 3- beds starting from £1,150pcm. By comparison, 2-beds in Sudbury (one of the main towns in Babergh, which is cheaper than Boxford and located c.6 miles away) start at around £550pcm for flats and £650 pcm for houses, and 3-beds start at around £700-£800pcm.'

18. Boyer re-ran the search for rental properties in Boxford (January 2021) and this identified 5 properties, none of which were in Boxford itself.



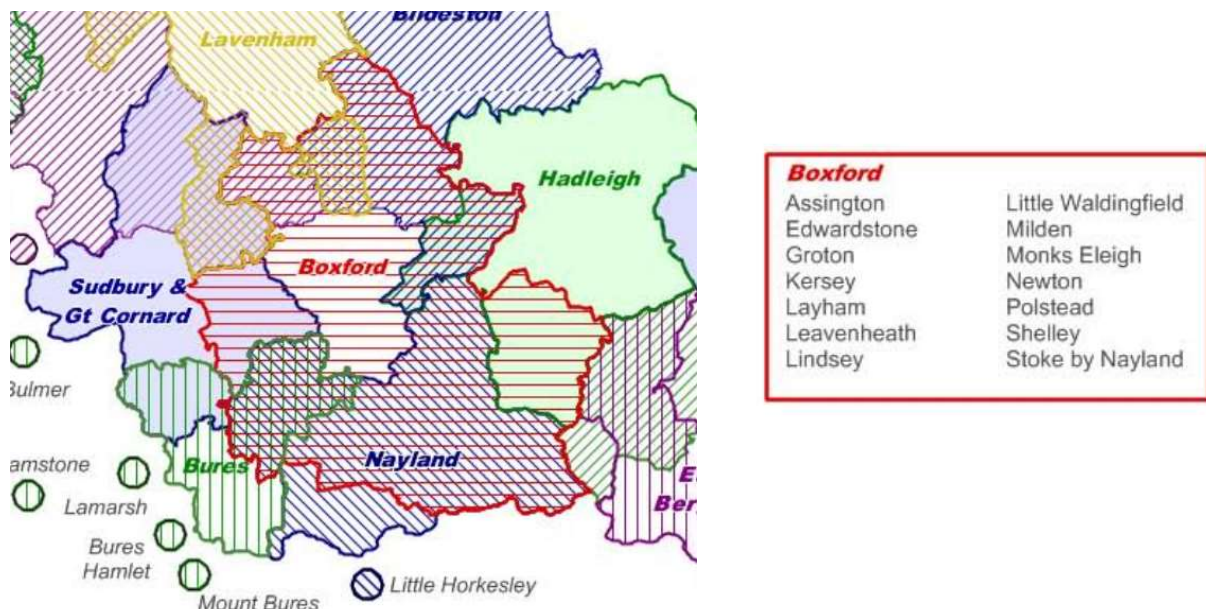
19. The latest Annual Monitoring Report for Babergh and Mid Suffolk published in October 2020 shows that for the Boxford functional cluster housing completions in 2019/2020 were 25 and this had fallen back from 32 in the previous year. The five year average for completions in the functional cluster is 25 units.

YEAR ON YEAR COMPLETIONS 1st April - 31st March	2015 - 2016	2016 - 2017	2017 - 2018	2018 - 2019	2019 - 2020
Functional cluster areas*					
Bildeston	5	10	2	23	5
Boxford	10	27	30	32	25
Bures	2	1	1	3	17
Capel St Mary	10	11	4	57	8
East Bergholt	8	11	9	48	10
Glemsford	7	26	35	11	17
Hadleigh	23	10	29	22	56
Holbrook	16	1	32	81	7
Ipswich	9	12	4	21	43
Lavenham	34	34	13	18	17
Long Melford	11	5	3	130	43
Nayland	2	3	6	5	20
Sudbury & Great Cornard	41	98	175	214	99

Table 6: Babergh completions by Functional Cluster

**Note: Total sum varies to the identified figure of net residential completions in Babergh as some Hinterland and rural villages appear in more than one Functional Cluster.*

20. It must however be recognised that the completion data provided by the Council potentially includes some double counting due to the overlapping of functional clusters. This is illustrated in the map⁵ below which is extracted from the adopted Core strategy.
21. The map below shows the significant extent of overlapping areas with Boxford's hinterland (outlined/shaded red) being 'shared' with an number of neighbouring functional clusters including Lavenham, Nayland, Bures, Sudbury & Gt Cornard.



⁵ [Map 5 - Functional Clusters in Babergh](#)

22. Therefore, whilst housing completions have been identified, not all are in the Core village. Lichfields Local Housing Need Assessment (2019) highlighted this point noting that some growth which the cluster has seen has taken place in Boxford itself, including development of 21 homes at Goodlands and 25 homes at land east of Boxford Court, Sand Hill. Four units were recently completed at Cygnet Court (off Land to the east of Sand Hill) and a single dwelling at The Bereley, Cox Hill. The outline planning permission for up to 64 dwellings at land to the east of Sand Hill was approved in December 2020.

23. In drawing together the analysis of Boxford's characteristics, the Lichfields (2019) Local Housing Need Assessment provided the following summary:

'Across the cluster, housing development has been below the district rate of growth over the longer term (with the exception of 2017/18). As expected of a rural area, the cluster has a large proportion of large, owner-occupied stock and a relatively low amount of affordable housing (albeit this has improved with the recent development which included one scheme of 25 units of which 20 were affordable). Houses in Boxford command significant premiums when compared with similar types of housing across the district, with even the cheapest housing (terraced) commanding over a 30% premium compared to district averages, costing around £240,000. Affordability is an issue across Babergh more widely and even more so specifically within Boxford, and the same is true of rental affordability. The lack of affordable options available locally is likely to contribute to the relatively high level of concealed families (particularly young people) and result in some households having to move further afield to find affordable housing.'

24. Our review has confirmed that these local issues still persist and these local factors have implications which need to be taken account of in establishing local housing needs in Boxford.

Local Housing Need Assessment

25. As highlighted earlier, parts of Boxford's cluster overlap into other clusters and for these villages, the need arising might met in Boxford, but might equally be met in other Core Villages, which also serve the overlapping hinterlands.

26. Recognising this, Lichfields 2019 assessment defined a smaller 'part' cluster for Boxford. This comprised areas and villages that fall solely within the Boxford cluster and do not overlap into other clusters (i.e. Boxford, Edwardstone and Groton), where their local needs are likely to be best met within Boxford itself. Lichfields define their 'whole' and 'part' cluster as:

'Boxford 'part' cluster – comprising the three Parishes which fall exclusively within the Boxford functional cluster (Boxford, Edwardstone and Groton). These are outlined in red in Figure 2.3 in Section 2.0 of this report. All housing needs arising within this part of the functional cluster fall solely within the Boxford cluster and thus it is reasonable to assume those needs will be met largely in Boxford. This indicates the absolute minimum level of need Boxford is likely to need to plan for;

Boxford 'whole' cluster – comprising all Parishes within the Boxford functional cluster, including those which overlap into other functional clusters. These are outlined in yellow in Figure 2.3 in Section 2.0 of this report. Needs arising here might be met in Boxford or one of the other adjacent clusters, but this gives an idea of the overall level of need that might be arising in the cluster.'

27. Having reviewed the geography of the defined part cluster, we agree with the analysis and logic taken forward by Lichfields in assessing the level of housing need across these two areas.

Supply – Housing Land

28. The housing land supply position and a summary of supply as at July 2019 for Boxford Cluster was set out in Tables 3.1 and 3.2 of the Lichfields (2019) assessment. These tables were based upon a Housing Land Supply Position Statement published by Babergh DC (July 2019). An update to the housing land supply was published by Babergh DC in October 2020. Boyer have reviewed the latest available supply data to check and update the local position for Boxford.

Supply Summary in Boxford – 2020 to 2025

	Boxford – part cluster 2020
Small sites with planning permission (<10 units)	13
Total	13

Sites in Supply from Council's Trajectory

Application Ref	Address	Status	Dwellings
DC/19/03791/FUL	Boxford - Land Adj The Pippins Calais Street Boxford CO10 5JA	under construction	1
DC/19/02781/OUT	Boxford - 30 Stone Street Boxford CO10 5NR	not started	1
DC/18/04967/OUT	Boxford - Green Lawns Bonsai Nursery Hadleigh Road Boxford CO10 5JH	not started	4
DC/19/04182/AGD Prior Approval (Agri)	Boxford - Farm Building At Siam Hall Siam Hall Lane Boxford Sudbury CO10 5LA	not started	1
DC/18/03944/FUL	Edwardstone - Land Adjacent Well House Round Maple Edwardstone CO10 5PR	not started	2
DC/19/01568/OUT	Edwardstone - Land East Of Mill Green Edwardstone Suffolk	not started	1
DC/19/03690/AGD Prior Approval (Agri)	Edwardstone - Quicks Barn Priory Green Edwardstone Sudbury Suffolk CO10 5PP	not started	1
DC/17/05843/OUT	Groton - Land At Mannings Farm Castlings Heath Groton Sudbury	not started	1
DC/18/05617/AGD Prior Approval (Agri)	Groton - Cider Barn Site To The West Of Castlings Heath Cottage Castlings Heath Groton, Sudbury CO10 5ES	not started	1

29. The 2019 work by Lichfields identified 10 dwellings in the pipeline for Boxford, our update has found 13 units, a modest increase of 3.

Needs Assessment Calculation

30. Using the above supply analysis we have reworked the local housing need for Boxford using the same methodology and calculations as the Lichfields 2019 Assessment.
31. There has been a marginal increase in the housing supply (3 units) and the latest housing need target for Babergh District has fallen slightly from 420 dwellings per annum (dpa) based on

2019, to 416⁶ dpa based on the 2020 Standard Methodology calculations. Taking account of these changes, the 'Top Down' or proportionate share of the district need based approach indicates the following local housing need.

	Boxford Whole Cluster	Boxford Part Cluster
Share of District's Population	8.4%	2.2%
Share of 416 dpa	34.94	9.15
Overall Need for Plan Period (to 2031)	350	92

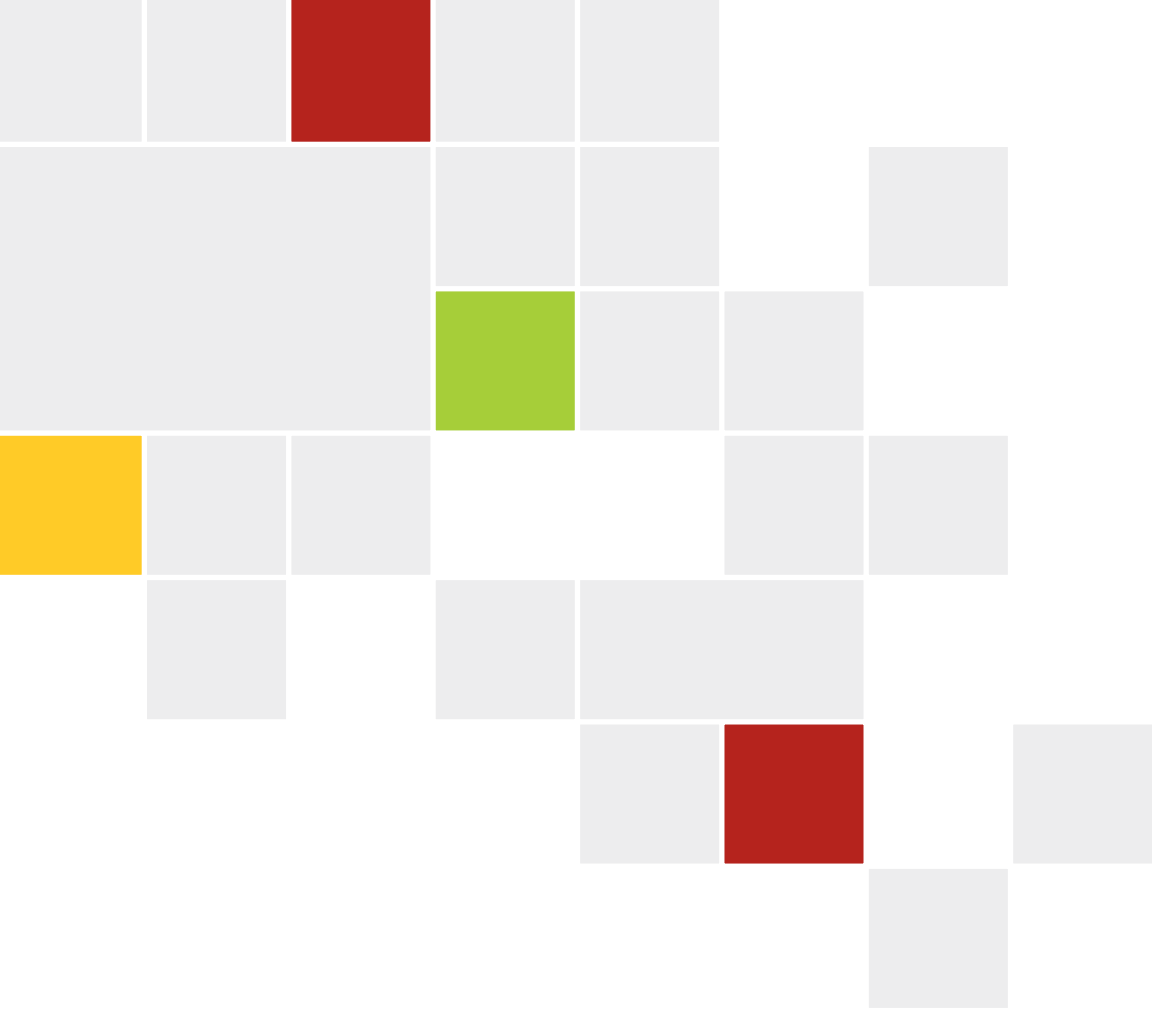
32. The Council's latest housing supply shows that Boxford (Part Cluster) has 13 units in the pipeline over the next five years, this confirmed supply reduces the need to 79 dwellings (Part Cluster).
33. For the Boxford Cluster as a whole, assuming the supply remains at 125 dwellings, the local need across the Whole Cluster is 225 dwellings.
34. Using local population characteristics as a starting point, and taking account of various assumptions around births, deaths, migration and household formation, provides an alternative demographic method of assessing the housing needs of a local area. Using this methodology, the local housing need for Boxford, updated from the 2019 Assessment prepared by Lichfields but taking the updated position on confirmed supply the local growth and district rate of growth, local need estimates are:

Local Growth: Boxford Whole Cluster	229 dwellings
District Growth: Boxford Whole Cluster	276 dwellings
Local Growth: Boxford Part Cluster	115 dwellings
District Growth: Boxford Part Cluster	135 dwellings

Local Housing Need Conclusion

35. Depending upon the local geography analysed and the basis of the calculation, the local housing need for Boxford is estimated to be a minimum of 79 dwellings and potentially 276 dwellings.
36. The geography focused upon Boxford and its immediate surroundings (Part Cluster) suggest an unmet local housing need of between 79 and 135 dwellings. On the basis that need calculated by the Standard Methodology is a minimum, an appropriate local housing need target would be in excess of this and would in our view be around the 115 dwellings shown by the local growth scenario.

⁶ <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-5YHLS-Report-05-10-20.pdf> - See paragraphs 2.2 to 2.6 of Babergh District Council Five-Year Housing Land Supply Position Statement 2020 Babergh District Council 5 th October, 2020



Boyer

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(11) RESIDENT – BISHOP

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 Bishop
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

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

Section Two: Your representation(s)

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

Paragraph No.	20	Policy No.	8
---------------	----	------------	---

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

Support		Oppose	
Support with modifications	X	Have Comments	X

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

I support the proposal of a village car park which would be particularly valuable during school pick up and drop off times. However, I vehemently oppose further double yellow lines in Swan Street. Having lived there for 20 years and experienced traffic speeds before the introduction of double yellow lines and after I have noticed the speed of vehicles has increased. I believe that parked cars help slow down traffic and in Swan Street this is a good thing. My wife and I have personally had several close shaves with vehicles as a pedestrian on the pavement. Cars mount the pavement and also travel far too fast. I have also noticed that since the introduction of the double yellow line passing places, the parked cars are either side of the passing places are constantly getting damaged when cars pull in to get out of the way of oncoming traffic.

I also vehemently oppose the introduction of a parking permit scheme. The last thing the residents of Swan Street need is less parking places. Also the necessary introduction of street furniture/signage would further obstruct the already narrow and difficult pavement for pedestrians.

Swan Street is firstly a residential road within a beautiful Suffolk village. In my opinion, we must try to keep it that way and not let it become too urbanised and lose its character for the sake of motorists who want to travel faster through the village.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

I would suggest a car park near the school and the removal of the double yellow lines in Swan Street which in my view has caused the traffic to travel much faster.

(Continue on separate sheet if necessary)

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

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

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

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

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

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	x
The final 'making' (adoption) of the Boxford NDP by Babergh District Council	x

Signed: [Mr] Bishop

Dated: 29.4.2022

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(12) RESIDENT - CARPENTER

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:	[Ms] Carpenter
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	████████████████████
Postcode:	██████████
Tel No:	██████████
E-mail:	████████████████████

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

Section Two: Your representation(s)

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

Paragraph No.	7.11	Policy No.	BOX1-3
---------------	------	------------	--------

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

Support	yes	Oppose	
Support with modifications		Have Comments	

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

I absolutely support this and the previous paragraph regarding new housing in Boxford, as well as all the other supporting factors for these statements. I live in Boxford and witness how our infrastructure is already at maximum, or beyond, capacity. I know the incredible diligence that has gone into the preparation of this plan, including surveying the opinions of village residents. I am also aware that some external surveys attached to planning applications have reported highly unrepresentative and inaccurate findings – especially regarding traffic. There is absolutely no need or capacity for anything other than the small scale new development as mentioned in the plan.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

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

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

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

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

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

I would only consider a hearing to be necessary if the plan was to be over-ridden by another body e.g. Babergh, who do not have the local knowledge of the village and were seeking to impose what was not wanted.

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	yes
The final 'making' (adoption) of the Boxford NDP by Babergh District Council	yes

Signed: [Ms] Carpenter


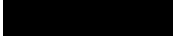

Dated: 28 April 2022

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(13) RESIDENT – GOLD

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) Gold
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

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

Section Two: Your representation(s)

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

Paragraph No.	8.20	Policy No.	
---------------	------	------------	--

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

Support		Oppose	
Support with modifications		Have Comments	yes

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

Please be as brief and concise as possible ..

Paragraph 8.18 correctly highlights the issue of visitors to the village for 'events' either at the village hall or the church. Paragraph 8.20 appears to override this by suggesting that parking in the new car park would be restricted to residents only - and that on street parking would be prohibited. I wonder therefore where the visitors mentioned in 8.18 would park in this scenario.

In general though this is a well thought and written plan overall.

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Please consider visitors as well as residents.

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 ..

Hearing not required, just consideration given, thanks.

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 Boxford NDP by Babergh District Council	Yes

Signed: [by email]	Dated: 18/4/22
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Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	Dr Michael Gray
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

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

Section Two: Your representation(s)

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

Paragraph No.	Chapter 7, Box 1	Policy No.	
---------------	------------------	------------	--

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

Support		Oppose	
Support with modifications	X	Have Comments	

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

All of my comments on the Pre-Submission draft, reproduced in the "Boxford Neighbourhood Plan Consultation Statement January 2022" still stand as no modifications in the current draft satisfactorily address those issues. In particular, the proposed development to provide seven houses and a village car park on land to the west of Stone Street Road outside the defined settlement boundary has been made worse. Regarding the fact that the development is outside the settlement boundary and does not satisfy any of the conditions set, the committee's response is simply to move the settlement boundary. If it is that easy, what is the point of it?

In addition, the current proposed development takes up a significantly greater portion of the field than that proposed in the draft. The field is a flood control wetland, which soaks up run-off water allowing it to enter the river at a controlled rate and prevent flooding. Any development of the land will increase run-off and the current plan covers around half the surface area.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Remove the current proposal to provide seven houses and a car park and investigate other, less damaging locations without dismissing them out of hand as appears to have happened by the fact that no document has been produced that discusses alternatives.

(Continue on separate sheet if necessary)

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

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

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

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

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

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Boxford NDP by Babergh District Council	

Signed: _____	Dated: 28/4/22
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(15) RESIDENT – GREGG

E from: Mr / Mrs Gregg
Rec'd: 4 Apr 2022
Subject: Submission Draft Boxford Neighbourhood Plan 2021 – 2037

Dear Mr Bryant,

Many thanks for the Public Notice correspondence on the Submission Draft Boxford Neighbourhood Plan 2021 – 2037, which gives those who live in the area the opportunity to comment on whether the “plan proposal” fulfils the conditions required by Paragraph 8(1)(a)(2) of Schedule 4B of the Planning Act 1990.

We have read the Submission Draft in detail, as we have the conditions required by the relevant sections of the Planning Act. We are in no doubt that the Submission Draft fulfils the basic conditions required. Furthermore, we were particularly impressed with the Submission’s clarity, detail, balanced judgements and informative and positive outlook, which, we would suggest, are directly in line with the Government’s requirements.

Yours faithfully,

[Ends]

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(16) RESIDENT - VOSVENIEKS

E from:

Rec'd: 29 April 2022

Subject: Submission Draft Boxford Neighbourhood Plan 2021-2037

Dear Community Planning Team

We were shocked to hear of the proposals outlined in your Submission Draft Boxford Neighbourhood Plan 2021-2037 regarding the introduction of parking permits on Swan Street as per the following excerpt, "only one permit per dwelling is normally allowed and the cost of the permit funds the administration of the scheme. This will not be popular with residents in the (mainly) listed properties ...". As a resident [...] with no off-road access to park, we would welcome restrictions on parking to residents only, especially as it is often impossible to park even close to our house; but not at our expense, nor to restrict such permits to one permit per household. Disregarding the rather odd, irrelevant note that there are mainly listed properties on Swan Street, I remind you that we are a rural community; it is disingenuous to believe that each household only has the parking requirements for one car.

On a slightly different note, I very much hope the draft Boxford neighbourhood plan contains restrictions on cars driving fast and on pavements down Swan Street. **There should be a speed limit of 20mph introduced throughout the whole of this village like there has been in Stoke by Nayland, especially as Boxford has twice the population of Stoke by Nayland and far more in need of such a restriction than Stoke.** I have teenagers who come out of our house to catch their buses in the morning and to be honest there is an accident waiting to happen on the pavements of Swan Street. My daughter narrowly missed being hit by a car driving at speed actually on the pavement outside our front door just a few weeks ago.

Kind regards,

[Ends]

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(17) RESIDENT – GREEN

E from:

Rec'd: 29 April 2022

Subject: Boxford Neighbourhood Plan

I am writing with views on the Swan Street parking element of the neighbourhood plan for Boxford - point 8.20 and 8.21. Firstly, I think a car park near the school is a great idea and have no objection to that. It'll be a real help for parents at pickup and drop-off time and for people visiting the village for long periods of time.

I do, however, object to the proposed plans for permit parking on Swan Street. As a resident, I can confirm that 'it will not be popular with the residents in the (mainly) listed properties'. But it appears that this is of no concern to the planners. The parking situation isn't ideal but we all manage. And to introduce yet more double yellow lines along with parking bays and multiple signs stating restrictions, will be a complete eyesore on a heritage street! There are ample yellow lines already. And how do you propose to control the parking restrictions? Visitors, parents and shoppers will still pull up on the street. We have several cottage industries on the road. This will discourage business. Do you intend to having wardens lurking round corners at all times to catch people. Is this an underhand way of increasing council revenue?

And what about the 4 night minimum residence in order to qualify for a parking permit? Again, how would this work? Will you put up cameras to record people's movements? Seems completely unworkable to me.

In short, I think the 'residents of Swan Street' should be left to do their own parking control, as we have done for years...

Yours sincerely

[Ends]