

Boxford Neighbourhood Plan – REG16 Consultation

Comments by Boxford Neighbourhood Plan Steering Group (BNPSG) on REG16 representations – 12th May 2022

Serial	Respondent	Boxford Neighbourhood Plan Steering Group comment
1	Suffolk County Council	<ul style="list-style-type: none"> No objection to what SCC are seeking to achieve or for it to be included, however it is our understanding that references to M4(2) and M4(3) in policy are often removed by Examiners referencing the Ministerial Statement.
2	Babergh District Council	<ul style="list-style-type: none"> Comments on housing chapter – no objections to the plan being amended to reflect these points Comments on Transport chapter – no objections to the plan being amended to reflect these points Comments on Built and Historic Environment Chapter – no objections to the plan being amended to reflect these points Community Infrastructure – no objections to the Plan being amended to reflect these points
3	Natural England	Noted
4	Suffolk Wildlife Trust	<ul style="list-style-type: none"> No objections to the plan being amended to reflect these points
5	Historic England	Noted
6	Defence Infrastructure Organisation on behalf of MOD	Noted
7	Water Management Alliance	Noted
8	Marine Management Organisation	Noted.
9	Catesby Estates	<ul style="list-style-type: none"> Babergh and Mid Suffolk published a Neighbourhood Planning Briefing Note on 16th December 2021, which was sent to all Neighbourhood Planning Groups. (See attached) The note advises that Neighbourhood Planning Groups should continue to produce Neighbourhood Plans in accordance with the indicative number (in the BMSJLP 2020) In addition the briefing note advises as follows:

		<p>“ However, it is understood that some groups may feel they wish to plan for an alternative number, and will need to consider the merits of doing so in each case. If a Neighbourhood Plan is made with a lower number than is subsequently identified in the Part 2 Joint Local Plan, the Councils will need to make allocation(s) to meet the Part 2 identified number”</p> <ul style="list-style-type: none"> • Paragraph 67 of the NPPF advises that where it is not possible to provide a requirement for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. The attached Neighbourhood Planning Briefing Note produced by Babergh Mid Suffolk fulfils that requirement. • The BNPSG had received and considered the implications of the briefing note before submitting the BNP to Babergh on 31st January 2022. • It is noted that Babergh DC have noted in their Regulation 16 comments that the Neighbourhood Plan contains updated text which explains the position with the Local Plan at the time of writing. • It is also noted that Babergh DC have not indicated that the approach to housing figures taken by the Neighbourhood Plan is problematic. • Paragraphs 7.5 to 7.11 of the Neighbourhood Plan explain the housing position. • In addition to identified housing requirement, Policy BOX3 of the Neighbourhood Plan allows for small scale affordable housing schemes which meet identified local needs, on sites outside of but immediately adjacent to the settlement boundary subject to criteria.
10	Boyer Planning on behalf of Vistry Group	<ul style="list-style-type: none"> • The Site Options Assessment and the Strategic Environmental Assessment have been produced by independent consultants AECOM . • It is noted that Babergh DC have noted in their Regulation 16 comments that the Neighbourhood Plan contains updated text which explains the position with the Local Plan at the time of writing. • It is also noted that Babergh DC have not indicated that the approach to housing figures taken by the Neighbourhood Plan is problematic. • Paragraphs 7.5 to 7.11 of the Neighbourhood Plan explain the housing position. • In addition to identified housing requirement, Policy BOX3 of the Neighbourhood Plan allows for small scale affordable housing schemes which meet identified local

		needs on sites outside of but immediately adjacent to the settlement boundary subject to criteria.
11	Resident – Bishop	<ul style="list-style-type: none"> • Support for the village car park is welcomed • The issue of traffic and parking on Swan Street is one of the most often raised issues through the evolution of the Neighbourhood Plan process and the Neighbourhood Plan has acknowledged these concerns and sought to address them insofar as its scope allows. • The issues were also taken into account by an Inspector in 2018 when dismissing an application for new housing for 24 dwellings north of Swan Street (paragraph 8.7 of the Neighbourhood Plan refers) and they are also reflected in the Boxford Travel Survey July 2021 in Appendix A of the Neighbourhood Plan. • The specific issue of double yellow lines in Swan Street lies outside of the remit of Neighbourhood Plan policy and is a reference in text only to an initiative that could be taken forward outside of the Neighbourhood Plan • It is also recognised that the introduction of such a measure could only follow. the provision of the village car park.
12	Resident: Carpenter	<ul style="list-style-type: none"> • Support welcomed.
13	Resident: Gold	<ul style="list-style-type: none"> • Support noted. • The issue of traffic and parking on Swan Street is one of the most often raised issues through the evolution of the Neighbourhood Plan process and the Neighbourhood Plan has acknowledged these concerns and sought to address them insofar as its scope allows. • The issues were also taken into account by an Inspector in 2018 when dismissing an application for new housing for 24 dwellings north of Swan Street (paragraph 8.7 of the Neighbourhood Plan refers) and they are also reflected in the Boxford Travel Survey July 2021 in Appendix A of the Neighbourhood Plan. • The specific references in paragraph 8.20 are to a scheme that could be taken forward outside of the Neighbourhood Plan, however It is also recognised that the introduction of such a measure could only follow. the provision of the village car park.
14	Resident: Gray	<ul style="list-style-type: none"> • Comments noted. It is common practice for settlement boundaries to include proposed allocations. See Wilby and Redgrave Neighbourhood Plans.
15	Resident: Gregg	<ul style="list-style-type: none"> • Support welcomed
16	Resident: Vosvenieks	<ul style="list-style-type: none"> • The issue of traffic and parking on Swan Street is one of the most often raised issues through the evolution of

		<p>the Neighbourhood Plan process and the Neighbourhood Plan has acknowledged these concerns and sought to address them insofar as its scope allows.</p> <ul style="list-style-type: none"> • The issues were also taken into account by an Inspector in 2018 when dismissing an application for new housing for 24 dwellings north of Swan Street (paragraph 8.7 of the Neighbourhood Plan refers) and they are also reflected in the Boxford Travel Survey July 2021 in Appendix A of the Neighbourhood Plan. • The specific references in paragraph 8.20 are to a scheme that could be taken forward outside of the Neighbourhood Plan, however It is also recognised that the introduction of such a measure could only follow. the provision of the village car park.
17	Resident - Green	<ul style="list-style-type: none"> • The issue of traffic and parking on Swan Street is one of the most often raised issues through the evolution of the Neighbourhood Plan process and the Neighbourhood Plan has acknowledged these concerns and sought to address them insofar as its scope allows. • The issues were also taken into account by an Inspector in 2018 when dismissing an application for new housing for 24 dwellings north of Swan Street (paragraph 8.7 of the Neighbourhood Plan refers) and they are also reflected in the Boxford Travel Survey July 2021 in Appendix A of the Neighbourhood Plan. • The specific references in paragraph 8.20 are to a scheme that could be taken forward outside of the Neighbourhood Plan, however It is also recognised that the introduction of such a measure could only follow. the provision of the village car park.

Babergh and Mid Suffolk District Councils – Neighbourhood Planning Briefing Note

Babergh and Mid Suffolk District Councils recognise that the pause in the Examination of the Babergh and Mid Suffolk Joint Local Plan may be causing concern for some Neighbourhood Plan Groups. It is therefore appropriate that we clarify the current position and set out interim guidance.

Background

Babergh and Mid Suffolk District Councils submitted their Joint Local Plan on 31st March 2021 for independent Examination. Progress has been made on many matters but proceedings were then paused in October 2021 to allow the Councils to consider the scope of additional work that needed to be undertaken for the Joint Local Plan to continue progress through Examination.

The Councils wrote to the Planning Inspectors on 18th November 2021 ([Document G08](#)) identifying the additional work they considered was necessary to be undertaken. The Inspectors replied on 9th December 2021 ([Document G09](#)) with a proposed way forward, to which the Councils agreed to in principle in a letter dated 10th December 2021 ([Document G10](#)), noting further discussion to be had. On 16th December 2021, an Exploratory Meeting was held with the Planning Inspectors at which the Councils agreed that it is necessary to split the Joint Local Plan into two parts.

The Part 1 document will contain all strategic policies (less Policy SP04 – Housing Spatial Distribution) and all development management policies (less Policy LP30 – Designated Open Spaces). Current settlement boundaries and open space designations would be saved from existing adopted policy and carried forward into the Part 1 document.

The Part 2 document would contain Policy SP04 – Housing Spatial Distribution and Policy LP30 – Designated Open Spaces and would include identifying residential site allocations; updated settlement boundaries; updated Gypsy and Traveller, and Travelling Showpeople policy and any necessary allocations; and open space designations. The timetable for the Part 2 Joint Local Plan will be set out in an updated Local Development Scheme to be adopted by the Councils in the first part of 2022.

What does a two-part Joint Local Plan mean for Neighbourhood Plan Groups?

The move to a Part 2 Joint Local Plan means that the minimum housing requirement for Neighbourhood Plan Areas set out in the Joint Local Plan (November 2020), has a new meaning. These numbers are now indicative and will be updated as the Part 2 document moves forward.

At this time, we would advise that Neighbourhood Plan Groups continue to produce Neighbourhood Plans in accordance with this indicative number. However, it is understood that some groups may feel they wish to plan for an alternative number, and will need to consider the merits of doing so in each case.

If a Neighbourhood Plan is made with a lower number than is subsequently identified in the Part 2 Joint Local Plan, the Councils will need to make allocation(s) to meet the Part 2 identified number.

It is recommended that Neighbourhood Plans are continued to be progressed, which will enable local communities to have an up-to-date site-specific document with locally specific development management policies that are part of the adopted Development Plan.

If a Neighbourhood Plan Group wishes to discuss any of these matters further, please contact us at communityplanning@baberghmidsuffolk.gov.uk.

16th December 2021