

Babergh District Council

**Edwardstone  
Neighbourhood Plan  
Review 2021 – 2037**

**Independent Examiner's Report**

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21 August 2024

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## Summary

I have been appointed by Babergh District Council to carry out the independent examination of the Edwardstone Neighbourhood Plan.

The Plan area consists of a rural Parish with the four hamlets of Mill Green, Priory Green, Round Maple and Sherbourne Street and other small clusters of houses. The Parish lies between Hadleigh and Sudbury. With a population of around 375, the Parish has a Grade I listed Church, a public house and a Parish Hall as well as valued areas of open space.

The Consultation Statement states that a key driver for the Plan was to give residents a voice in the sustainable development of the Parish, by developing a Plan that is inclusive, innovative and bespoke to the needs of the Parish. In addition, the Parish Council was keen to produce a document that would enable them to provide informed and consistent responses to consultations on planning applications within the Parish. There is little doubt in my mind that has been achieved.

The Plan is exceptionally well presented and well articulated. There is a clear and good link between the vision, the objectives that support it and the 11 policies. Sustainable development is at the heart of the Plan. It is supported by an exemplary Basic Conditions Statement and Consultation Statement which made my task all the easier.

It has been necessary to recommend some modifications. In the main these are intended to ensure the Plan is clear and precise and provides a practical framework for decision-making as required by national policy and guidance. These do not significantly or substantially alter the overall nature of the Plan.

Subject to those modifications, I have concluded that the Plan does meet the basic conditions and all the other requirements I am obliged to examine. I am therefore pleased to recommend to Babergh District Council that the Edwardstone Neighbourhood Development Plan can go forward to a referendum.

In considering whether the referendum area should be extended beyond the Neighbourhood Plan area I see no reason to alter or extend this area for the purpose of holding a referendum.

Ann Skippers MRTPI  
Ann Skippers Planning  
21 August 2024



## 1.0 Introduction

This is the report of the independent examiner into the Edwardstone Neighbourhood Development Plan (the Plan).

The Localism Act 2011 provides a welcome opportunity for communities to shape the future of the places where they live and work and to deliver the sustainable development they need. One way of achieving this is through the production of a neighbourhood plan.

I have been appointed by Babergh District Council (BDC) with the agreement of Edwardstone Parish Council to undertake this independent examination.

I am independent of the qualifying body and the local authority. I have no interest in any land that may be affected by the Plan. I am a chartered town planner with over thirty years experience in planning and have worked in the public, private and academic sectors and am an experienced examiner of neighbourhood plans. I therefore have the appropriate qualifications and experience to carry out this independent examination.

## 2.0 The role of the independent examiner and the examination process

### *Role of the Examiner*

The examiner must assess whether a neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

The basic conditions<sup>1</sup> are:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan
- The making of the neighbourhood plan contributes to the achievement of sustainable development
- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area
- The making of the neighbourhood plan does not breach, and is otherwise compatible with, retained European Union (EU) obligations<sup>2</sup>

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<sup>1</sup> Set out in paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and paragraph 11(2) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended)

<sup>2</sup> Substituted by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018/1232 which came into force on 31 December 2020

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

Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) set out two additional basic conditions to those set out in primary legislation and referred to in the paragraph above. Only one is applicable to neighbourhood plans and was brought into effect on 28 December 2018.<sup>3</sup> It states that:

- The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

The examiner is also required to check<sup>4</sup> whether the neighbourhood plan:

- Has been prepared and submitted for examination by a qualifying body
- Has been prepared for an area that has been properly designated for such plan preparation
- Meets the requirements to i) specify the period to which it has effect; ii) not include provision about excluded development; and iii) not relate to more than one neighbourhood area and that
- Its policies relate to the development and use of land for a designated neighbourhood area.

I must also consider whether the draft neighbourhood plan is compatible with Convention rights.<sup>5</sup>

The examiner must then make one of the following recommendations:

- The neighbourhood plan can proceed to a referendum on the basis it meets all the necessary legal requirements
- The neighbourhood plan can proceed to a referendum subject to modifications or
- The neighbourhood plan should not proceed to a referendum on the basis it does not meet the necessary legal requirements.

If the plan can proceed to a referendum with or without modifications, the examiner must also consider whether the referendum area should be extended beyond the neighbourhood plan area to which it relates.

If the plan goes forward to referendum and more than 50% of those voting vote in favour of the plan then it is made by the relevant local authority, in this case BDC. The

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<sup>3</sup> Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018

<sup>4</sup> Set out in sections 38A and 38B of the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act and paragraph 11(2) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended)

<sup>5</sup> The combined effect of the Town and Country Planning Act Schedule 4B para 8(6) and para 10 (3)(b) and the Human Rights Act 1998

plan then becomes part of the 'development plan' for the area and a statutory consideration in guiding future development and in the determination of planning applications within the plan area.

### ***Examination Process***

It is useful to bear in mind that the examiner's role is limited to testing whether or not the submitted neighbourhood plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and paragraph 11 of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended).<sup>6</sup>

Planning Practice Guidance (PPG) confirms that the examiner is not testing the soundness of a neighbourhood plan or examining other material considerations.<sup>7</sup>

In addition, PPG is clear that neighbourhood plans are not obliged to include policies on all types of development.<sup>8</sup> Often representations, as in this case, suggest amendments to policies or additional policies or different approaches. Where I find that policies do meet the basic conditions, it is not necessary for me to consider if further amendments or additions are required.

PPG<sup>9</sup> explains that it is expected that the examination will not include a public hearing. Rather the examiner should reach a view by considering written representations. Where an examiner considers it necessary to ensure adequate examination of an issue or to ensure a person has a fair chance to put a case, then a hearing must be held.<sup>10</sup>

After consideration of all the documentation and the representations made, I decided that it was not necessary to hold a hearing.

In 2018, the Neighbourhood Planning Independent Examiner Referral Service (NPIERS) published guidance to service users and examiners. Amongst other matters, the guidance indicates that the qualifying body will normally be given an opportunity to comment upon any representations made by other parties at the Regulation 16 consultation stage should they wish to do so. There is no obligation for a qualifying body to make any comments; it is only if they wish to do so. The Parish Council made comments on the Regulation 16 stage representations and I have taken these into account.

I am very grateful to everyone for ensuring that the examination has run so smoothly and in particular Paul Bryant at BDC.

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<sup>6</sup> Paragraph 11(3) of Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended) and PPG para 055 ref id 41-055-20180222,

<sup>7</sup> PPG para 055 ref id 41-055-20180222

<sup>8</sup> Ibid para 040 ref id 41-040-20160211

<sup>9</sup> Ibid para 056 ref id 41-056-20180222

<sup>10</sup> Ibid

I made an unaccompanied site visit to familiarise myself with the Plan area on 9 August 2024.

### ***Modifications and how to read this report***

Where modifications are recommended they appear in a bullet point list of **bold text**. Where I have suggested specific changes to the wording of the policies or new wording these appear in ***bold italics*** in the bullet point list of recommendations. Modifications will always appear in a bullet point list.

As a result of some modifications consequential amendments may be required. These can include changing policy numbering, section headings, amending the contents page, renumbering paragraphs or pages, ensuring that supporting appendices and other documents align with the final version of the Plan and so on.

I regard these issues as primarily matters of final presentation and do not specifically refer to all such modifications, but have an expectation that a common sense approach will be taken and any such necessary editing will be carried out and the Plan's presentation made consistent.

## **3.0 Neighbourhood plan preparation**

A Consultation Statement has been submitted. It meets the requirements of Regulation 15(2) of the Neighbourhood Planning (General) Regulations 2012.

Work began on the Plan in 2021. A Steering Group consisting of both residents and Parish Councillors was set up.

A short questionnaire aimed at identifying key issues was delivered to every household in early 2022. Steering Group members went door to door. A data profile was also developed to help inform policy development. A Design Code was commissioned.

The Steering Group developed a series of policy ideas which were shared with the community via a drop-in exhibition at the Parish Hall in September 2022 over two days. This event was publicised through a leaflet drop to every household. 71 people attended the event.

There is a dedicated Plan page on the Parish Council's website which is regularly updated. Details of all consultation events were published in the Box River News as well as posters and flyers. Updates were given at every Parish Council meeting.

Pre-submission (Regulation 14) consultation took place between 30 October – 11 December 2023. The draft Plan was available online and in two locations within the Parish. A drop-in event was held mid way in the consultation period.

I consider that the consultation and engagement carried out is satisfactory.

Submission (Regulation 16) consultation was carried out between 29 April – 14 June 2024.

The Regulation 16 stage resulted in 14 representations. I have considered all of the representations and taken them into account in preparing my report.

I note that a representation from the Defence Infrastructure Organisation explains that development can form a physical obstruction to the safe operation of aircraft and the creation of environments attractive to large and flocking bird species can pose a hazard to aviation safety in identified safeguarding zones. As a result the Ministry of Defence should be consulted on certain applications within the safeguarding zones. This is primarily a matter for development management at BDC level.

## **4.0 Compliance with matters other than the basic conditions**

### ***Qualifying body***

Edwardstone Parish Council is the qualifying body able to lead preparation of a neighbourhood plan. This requirement is satisfactorily met.

### ***Plan area***

The Plan area is coterminous with the administrative boundary for the Parish. BDC approved the designation of the area on 30 March 2021. The Plan relates to this area and does not relate to more than one neighbourhood area and therefore complies with these requirements. The Plan area is shown on page 4 of the Plan.

### ***Plan period***

The Plan period is 2021 – 2037. This is clearly stated in the Plan itself. The requirement is therefore satisfactorily met.

### ***Excluded development***

The Plan does not include policies that relate to any of the categories of excluded development and therefore meets this requirement. This is also helpfully confirmed in the Basic Conditions Statement.

### ***Development and use of land***

Policies in neighbourhood plans must relate to the development and use of land. Sometimes neighbourhood plans contain aspirational policies or projects that signal the community's priorities for the future of their local area, but are not related to the



development and use of land. If I consider a policy or proposal to fall within this category, I will recommend it be clearly differentiated. This is because wider community aspirations than those relating to development and use of land can be included in a neighbourhood plan, but actions dealing with non-land use matters should be clearly identifiable.<sup>11</sup>

In this case, a number of Community Projects are referred to in Section 6 of Plan. They are clearly distinguishable from the planning policies and accompanied by a good explanation. I therefore consider this approach to be acceptable for this Plan.

## 5.0 The basic conditions

### *Regard to national policy and advice*

The Government revised the National Planning Policy Framework (NPPF) on 19 December 2023 and updated it on 20 December 2023. This revised NPPF replaces the previous NPPFs published in March 2012, revised in July 2018, updated in February 2019, revised in July 2021 and updated in September 2023.

The NPPF is the main document that sets out the Government's planning policies for England and how these are expected to be applied.

In particular it explains that the application of the presumption in favour of sustainable development will mean that neighbourhood plans should support the delivery of strategic policies in local plans or spatial development strategies and should shape and direct development that is outside of these strategic policies.<sup>12</sup>

Non-strategic policies are more detailed policies for specific areas, neighbourhoods or types of development.<sup>13</sup> They can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment as well as set out other development management policies.<sup>14</sup>

The NPPF also makes it clear that neighbourhood plans gives communities the power to develop a shared vision for their area.<sup>15</sup> However, neighbourhood plans should not promote less development than that set out in strategic policies or undermine those strategic policies.<sup>16</sup>

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<sup>11</sup> PPG para 004 ref id 41-004-20190509

<sup>12</sup> NPPF para 13

<sup>13</sup> Ibid para 28

<sup>14</sup> Ibid

<sup>15</sup> Ibid para 29

<sup>16</sup> Ibid

The NPPF states that all policies should be underpinned by relevant and up to date evidence; evidence should be adequate and proportionate, focused tightly on supporting and justifying policies and take into account relevant market signals.<sup>17</sup>

Policies should be clearly written and unambiguous so that it is evident how a decision maker should react to development proposals. They should serve a clear purpose and avoid unnecessary duplication of policies that apply to a particular area including those in the NPPF.<sup>18</sup>

On 6 March 2014, the Government published a suite of planning guidance referred to as Planning Practice Guidance (PPG). This is an online resource available at [www.gov.uk/government/collections/planning-practice-guidance](http://www.gov.uk/government/collections/planning-practice-guidance) which is regularly updated. The planning guidance contains a wealth of information relating to neighbourhood planning. I have also had regard to PPG in preparing this report.

PPG indicates that a policy should be clear and unambiguous<sup>19</sup> to enable a decision maker to apply it consistently and with confidence when determining planning applications. The guidance advises that policies should be concise, precise and supported by appropriate evidence, reflecting and responding to both the planning context and the characteristics of the area.<sup>20</sup>

PPG states there is no 'tick box' list of evidence required, but proportionate, robust evidence should support the choices made and the approach taken.<sup>21</sup> It continues that the evidence should be drawn upon to explain succinctly the intention and rationale of the policies.<sup>22</sup>

Whilst this has formed part of my own assessment, the Basic Conditions Statement sets out how the Plan's policies correspond to the NPPF.

### ***Contribute to the achievement of sustainable development***

A qualifying body must demonstrate how the making of a neighbourhood plan would contribute to the achievement of sustainable development.

The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development.<sup>23</sup> This means that the planning system has three overarching and interdependent objectives which should be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives.<sup>24</sup>

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<sup>17</sup> NPPF para 31

<sup>18</sup> Ibid para 16

<sup>19</sup> PPG para 041 ref id 41-041-20140306

<sup>20</sup> Ibid

<sup>21</sup> Ibid para 040 ref id 41-040-20160211

<sup>22</sup> Ibid

<sup>23</sup> NPPF para 7

<sup>24</sup> Ibid para 8

The three overarching objectives are:<sup>25</sup>

- a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

The NPPF confirms that planning policies should play an active role in guiding development towards sustainable solutions, but should take local circumstances into account to reflect the character, needs and opportunities of each area.<sup>26</sup>

Whilst this has formed part of my own assessment, the Basic Conditions Statement sets out how each Plan objective and policy helps to achieve each of the objectives of sustainable development as outlined in the NPPF.

### ***General conformity with the strategic policies in the development plan***

The development plan consists of the Babergh and Mid Suffolk Joint Local Plan Part 1 (JLP) which was adopted by BDC on 21 November 2023 and some saved policies from the Babergh Local Plan Alteration No. 2 (LP) adopted in June 2006 and the Core Strategy (CS) adopted in February 2014. None of the saved policies are relevant to this examination. The Suffolk Minerals and Waste Local Plan 2020 also forms part of the development plan as well as other made neighbourhood plans.

The Basic Conditions Statement assesses the saved policies of LP and CS as well as the emerging policies of the JLP. Since the submission of the Review Plan this situation has of course changed with the adoption of the JLP Part 1. Consultation has been held as noted earlier to allow comments to be made.

### ***Retained European Union Obligations***

A neighbourhood plan must be compatible with retained European Union (EU) obligations. A number of retained EU obligations may be of relevance for these purposes including those obligations in respect of Strategic Environmental Assessment,

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<sup>25</sup> NPPF para 8

<sup>26</sup> Ibid para 9

Environmental Impact Assessment, Habitats, Wild Birds, Waste, Air Quality and Water matters.

With reference to Strategic Environmental Assessment (SEA) requirements, PPG<sup>27</sup> confirms that it is the responsibility of the local planning authority, in this case BDC, to ensure that all the regulations appropriate to the nature and scope of the draft neighbourhood plan have been met. It states that it is BDC who must decide whether the draft plan is compatible with relevant retained EU obligations when it takes the decision on whether the plan should proceed to referendum and when it takes the decision on whether or not to make the plan.

### ***Strategic Environmental Assessment and Habitats Regulations Assessment***

The provisions of the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations') concerning the assessment of the effects of certain plans and programmes on the environment are relevant. The purpose of the SEA Regulations, which transposed into domestic law Directive 2001/42/EC ('SEA Directive'), are to provide a high level of protection of the environment by incorporating environmental considerations into the process of preparing plans and programmes.

The provisions of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'), which transposed into domestic law Directive 92/43/EEC (the 'Habitats Directive'), are also of relevance to this examination.

Regulation 63 of the Habitats Regulations requires a Habitats Regulations Assessment (HRA) to be undertaken to determine whether a plan is likely to have a significant effect on a European site, either alone or in combination with other plans or projects. The HRA assessment determines whether the Plan is likely to have significant effects on a European site considering the potential effects both of the Plan itself and in combination with other plans or projects. Where the potential for likely significant effects cannot be excluded, an appropriate assessment of the implications of the Plan for that European Site, in view of the Site's conservation objectives, must be carried out.

A Screening Determination dated February 2024 has been prepared by BDC. This in turn refers to a SEA Screening Opinion Final Report prepared by Land Use Consultants which concluded that the Plan was unlikely to have significant environmental effects.

Consultation with the statutory bodies was undertaken. Responses from Historic England and Natural England concurred; no response was received from the Environment Agency.

I have treated the Screening Opinion Report and the Screening Determination to be the statement of reasons that the PPG advises must be prepared and submitted with the

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<sup>27</sup> PPG para 031 ref id 11-031-20150209

neighbourhood plan proposal and made available to the independent examiner where it is determined that the plan is unlikely to have significant environmental effects.<sup>28</sup>

Taking account of the characteristics of the Plan, the information put forward and the characteristics of the areas most likely to be affected, I consider that retained EU obligations in respect of SEA have been satisfied.

Turning now to HRA, a Habitats Regulations Screening Determination dated February 2024 has been prepared by BDC. This in turn refers to a HRA Screening Report of November 2023 prepared by Land Use Consultants.

The Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar sites are located some 18km from the Plan area and have been identified for inclusion in the HRA.

The Screening Report concludes that no likely significant effects are predicted, either alone or in combination with other plans and projects. Natural England concurred with the findings of the Screening Report.

The Screening Determination concludes that Appropriate Assessment (AA) is not required.

On 28 December 2018, the basic condition prescribed in Regulation 32 and Schedule 2 (Habitats) of the Neighbourhood Planning (General) Regulations 2012 (as amended) was substituted by a new basic condition brought into force by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 which provides that the making of the plan does not breach the requirements of Chapter 8 of Part 6 of the Habitats Regulations.

Given the distance from, the nature and characteristics of the European sites and the nature and contents of the Plan, I agree with the conclusion of the Screening Determination and consider that the prescribed basic condition relating to the Conservation of Habitats and Species Regulations 2017 is complied with.

### ***Conclusion on retained EU obligations***

PPG establishes that the ultimate responsibility for determining whether a plan meets retained EU obligations lies with the local planning authority.<sup>29</sup> BDC does not raise any concerns in this regard.

### ***European Convention on Human Rights (ECHR)***

The Basic Conditions Statement contains a statement in relation to human rights and equalities. Having regard to the Basic Conditions Statement, there is nothing in the Plan that leads me to conclude there is any breach or incompatibility with Convention rights.

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<sup>28</sup> PPG para 028 ref id 11-028-20150209

<sup>29</sup> Ibid para 031 ref id 11-031-20150209

## 6.0 Detailed comments on the Plan and its policies

In this section I consider the Plan and its policies against the basic conditions. Where modifications are recommended they appear in **bold text**. As a reminder, where I suggest specific changes to the wording of the policies or new wording these appear in **bold italics**.

The Plan is presented to an exceptionally high standard and contains 11 policies. There is a helpful contents page at the start of the Plan.

### 1. Introduction

This is a helpful introduction to the Plan that sets out basic information about the Plan and how it has evolved. This is a very clear and well-written section that offers a good explanation of the work carried out and the next stages. There is a very helpful and clear figure which shows the different stages. Some natural updating will be needed as the Plan progresses towards the next stages.

### 2. Edwardstone Parish

This is an informative section about the history and present attributes of the Parish.

### 3. National and local context

This section usefully explains the policy context for the Plan.

A representation from BDC suggests some minor changes to the wording in this section. The Parish Council has helpfully accepted these changes which I also consider help with clarity and bring the Plan up to date. I have included the changes put forward by BDC here for completeness.

- **Delete the sentence that reads “The Plan period for the Core Strategy runs to 2031” in paragraph 3.5 on page 21 of the Plan**
- **Update Figure 14 on page 22**
- **Delete the sub headings “Adopted Local Planning Policy” and “Emerging Local Planning Policy” on pages 22 and 23 respectively**
- **Amend paragraph 3.6 on page 22 to read:**

**“The part of Edwardstone known as Mill Green was identified as a ‘Hinterland village’ in the settlement hierarchy of the 2014 Core Strategy under Policy CS2. The Core Strategy approach to development *was* that most new development (including employment, housing, and retail, etc.) in Babergh *would* be directed sequentially to the towns / urban areas, and then to the Core Villages followed**

by the Hinterland Villages. In all cases the scale and location of development *would* depend upon the local housing need, the role of settlements as employment providers and retail/service centres, 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 as expressed in parish / community / neighbourhood plans.”

- Replace Figure 15 on page 23 with the 2006 Babergh Local Plan settlement boundary map and amend the accompanying text to read: “Figure 15: Edwardstone Inset Map from *2006 Babergh Local Plan* (Orange line denotes settlement boundary; green denotes listed buildings)”
- Change the reference to “red” shading in the text for Figure 16 on page 24 to “*light orange*”
- Add a key to Figure 17 on page 25 that reads “(Purple line denotes proposed settlement boundary and green denotes listed buildings)”

#### ***4. How the Plan was prepared***

This section describes the various stages of plan making and signposts to the Consultation Statement for more detailed information.

#### ***5. Vision and Objectives***

The vision for the area is:

“In 2037, Edwardstone will still be a small, secluded, peaceful and safe place with protected open spaces, big skies, open views, and valued community facilities.

New development will respect and enhance the existing rural character and agricultural heritage of the distinct hamlets and surrounding countryside, protect, and encourage biodiversity and be environmentally sustainable in the context of the climate emergency.”

The vision is underpinned by four objectives across the four topic areas of housing, environment, landscape and access and community.

Both the vision and the objectives are clearly articulated and relate to the development and use of land and put sustainable development at the heart of the Plan.

## **6. Neighbourhood Plan Policies**

The introduction to this section of the Plan explains the structure of the Plan and also refers to four community projects identified as part of the neighbourhood planning process. It is clear that progress has been made on all four projects.

## **7. Housing**

An update to the information in paragraph 7.5 is needed.

The NPPF states that to help support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land comes 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.<sup>30</sup> It continues that the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.<sup>31</sup>

Within this context, it is clear that size, type and tenure of housing needed for different groups in the community should be assessed and reflected in policy.<sup>32</sup> These groups include affordable housing, families with children, older people and those with disabilities.<sup>33</sup>

In rural areas, the NPPF explains that policies should be responsive to local circumstances and support housing developments that reflect local needs.<sup>34</sup>

The JLP explains that in Babergh District, the JLP will seek to deliver some 7,904 net dwellings (JLP Policy SP01). It encourages a mix of tenure, size and type depending on needs.

JLP Policy SP03 sets out an expectation that housing will come forward through extant permissions, allocations in neighbourhood plans, windfall development and through allocations in the JLP Part 2. Settlement boundaries will also be reviewed as part of the work on the JLP Part 2.

There are two policies in this section.

**Policy EDW1: Location and scale of new housing development** is a long policy which firstly seeks to designate two settlement boundaries; one in Sherbourne Street and one at Mill Green.

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<sup>30</sup> NPPF para 60

<sup>31</sup> Ibid

<sup>32</sup> Ibid para 63

<sup>33</sup> Ibid

<sup>34</sup> Ibid para 82



Both boundaries are based on those carried forward from the 2006 Babergh Local Plan and the revisions put forward in an early version of the JLP, but have been updated to reflect recent completions and dwellings under construction.

JLP Policy SP03 essentially carries forward the settlement boundaries from previous development plan documents.

Both boundaries are clearly shown on pages 38 and 39 of the Plan respectively. It would be helpful to refer to these two Figures in the policy itself for completeness and clarity. From my site visit, I consider the boundaries have been drawn logically.

I note there is a representation asking for the Mill Green settlement boundary to be reviewed and further land included within it. There is no compulsion for the Plan to provide for housing or other development given the settlement's status in the District's settlement hierarchy and the current housing provision across the District. Whilst there are always different ways to designate settlement boundaries, I found that they have been drawn logically for the locality and consistently. I also note BDC has not objected to the delineation put forward in the Plan.

The policy supports new housing within the two settlement boundaries subject to various criteria aimed at ensuring the character and appearance of the new development is not at odds with the settlement.

Outside the settlement boundaries, Policy EDW1 only supports development in line with the NPPF or as a rural exception site. Specific reference is made to paragraph 84 in the NPPF which outlines a number of circumstances where dwellings in the countryside may be acceptable. In order to future proof the Plan, given the likelihood of a new NPPF later this year, a modification is made to this part of the policy to help to ensure its robustness and to fully recognise the different types of development supported by the NPPF. The modification also takes account of the need to be in general conformity with JLP Policy SP03.

JLP Policy SP03 explicitly states that outside the settlement boundaries, development is only permitted where a site is allocated for development, it is in accordance with a made neighbourhood plan, it is in accordance with JLP policies or it is in accordance with the NPPF. The non-strategic JLP policies referred to include windfall infill development where there is a cluster of at least 10 well-related dwellings, residential annexes, replacement dwellings and conversions.

There is therefore some crossover between the NPPF and JLP Policy SP03 and so the modification is devised to address this.

Reference is then made to the gaps between the hamlets in the Parish. I saw at my site visit the important contribution these gaps make to the character and appearance of the locality.

Conversions and extensions are specifically referred to in the next parts of the policy.

With regard to conversions, I note that JLP Policy SP03 refers to non-strategic JLP Policy LP04. In turn JLP Policy LP04 sets out a number of criteria for conversions. Coupled with this, there are various permitted development rights for the change of use of agricultural and outlying buildings into residential.

I therefore propose to amend the wording of this paragraph in Policy EDW1 to reflect the various issues.

The second policy in this section is **Policy EDW2: Housing Mix and Affordable Housing**.

The Plan explains that the existing housing stock in the Parish is predominately detached or semi-detached. Properties also tend to be larger with about three quarters of the stock having three or four bedrooms. There is significant under-occupancy and some evidence of the need for smaller units.

As a result, the first part of Policy EDW2 supports housing which provides a better balance. It particularly supports smaller units aimed at first time buyers and downsizers as well as encouraging adaptable and accessible homes.

The second part of the policy refers to affordable housing and supports rural exception sites outside, but immediately adjacent to the settlement boundaries. This is dependent on local housing need being established and subject to various criteria.

The NPPF offers support to rural exception sites that provide affordable housing to meet identified local needs and indicate that some market housing on these sites may help to facilitate this.<sup>35</sup>

Non-strategic JLP Policy LP07 offers support for such sites if they are well connected to an existing settlement and are proportionate in size to it. JLP Policy LP07 recognises that some market housing up to 35% may support the delivery of such sites.

I note that non-strategic JLP Policy LP07 requires sites to be well connected to the existing settlement rather than only immediately adjacent to a settlement boundary. Whilst there is no requirement to be in general conformity with this non-strategic policy, the Parish Council have helpfully accepted the suggested amendments put forward by BDC's Strategic Housing Team which encompass both scenarios. In the interests of clarity, a modification is duly recommended.

The second issue is the cross-reference in this part of the policy to Policy EDW1 which I consider could be confusing given much of Policy EDW1 will not apply. A modification is made to remove the reference but retain the relevant considerations which are not covered elsewhere by Policy EDW2 for example.

Lastly, BDC's Strategic Housing Team suggest an amendment to criterion d) which has been accepted by the Parish Council. I agree that this would be clearer and a

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<sup>35</sup> NPPF para 82

modification is therefore recommended.

This policy is a local and detailed interpretation of JLP Policies SP01 and SP02 which sets out the expectations for affordable housing. I note that the JLP indicates that neighbourhood plans can set out an approach to help influence the mix of housing tenure, size and type specific to the local area as long as it is in general conformity with JLP Policies SP01 and SP02.<sup>36</sup>

The footnote to Policy EDW2 seems to have split across two pages; a modification is recommended as the word seems unnecessary.

With these modifications, I consider **Policies EDW1 and EDW2** will meet the basic conditions by having regard to the NPPF, being in general conformity with, and adding a layer of local detail, to JLP Policies SP01, SP02 and SP03 and will help to achieve sustainable development.

- **Update “...September 2022...” in paragraph 7.5 on page 36 of the Plan to “...December 2022...”**
- **Add the words “as shown on Figures 22 and 23 of the Plan” after “...Sherbourne Street...” in the second paragraph of Policy EDW1**
- **Amend the third paragraph of Policy EDW1 to read:**

**“Development outside *the* defined settlement boundaries will only be supported where:**

- ***it is in accordance with JLP Policy SP03 or***
- ***it is a rural exception site for affordable housing or***
- ***where the development would re-use redundant or disused buildings and enhance its immediate setting or***
- ***where the development would involve the subdivision of an existing residential building or the design is of exceptional quality.***

***All new development should comply with other policies in this neighbourhood plan.”***

- **Amend paragraph five of Policy EDW1 on conversions to read:**

***“Where planning permission is required, proposals for the conversion of rural buildings to residential dwellings are supported provided that the development:***

***i) would re-use redundant or disused buildings and enhance its immediate setting;***

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<sup>36</sup> JLP para 07.10, page 27

ii) is of an appropriate scale and setting for the area including any extensions or ancillary buildings such as garages;  
iii) has safe and suitable access;  
iv) provides an acceptable level of amenity for new occupiers and has an acceptable impact on the living conditions of existing nearby residents; and  
v) achieves a high standard of design appropriate to its context.”

- Add the words “*or well connected and proportionate in size to*” after “...but immediately adjacent to...” in paragraph four of Policy EDW2
- Change criterion a) of Policy EDW2 to remove the reference to Policy EDW1 and replace this with a new criterion that reads:

**“a) The proposal will be sustainable in terms of location and *be of a scale and form commensurate with the scale and form of the existing built settlement and must conserve or enhance the character and appearance of the area taking account of the physical undeveloped separation between the distinct hamlets and be consistent with Policy EDW3 in respect of design.*”**

- Amend the first sentence of criterion d) of Policy EDW2 to read:”

**“d) The housing is offered in the first instance to people with a demonstrated local connection to *Edwardstone as set out in the Gateway to Homechoice (Choice Based Letting Scheme) Allocations Policy 2022 (or successor document).*’**

- Remove the stray footnote at the bottom of page 45

## **8. Environment**

The NPPF states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.<sup>37</sup> Being clear about design expectations is essential for achieving this.<sup>38</sup>

It continues that neighbourhood planning groups can play an important role in identifying the special qualities of an area and explaining how this should be reflected in development.<sup>39</sup> It refers to design guides and codes to help provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design.<sup>40</sup>

It continues that planning policies should ensure developments function well and add to the overall quality of the area, are visually attractive, are sympathetic to local character and history whilst not preventing change or innovation, establish or maintain a strong

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<sup>37</sup> NPPF para 131

<sup>38</sup> Ibid

<sup>39</sup> Ibid para 132

<sup>40</sup> Ibid para 133

sense of place, optimise site potential and create places that are safe, inclusive and accessible.<sup>41</sup>

JLP Policy SP10 in addressing climate change, seeks, amongst other things, to support sustainable design and construction.

Non-strategic JLP Policy LP23 refers to sustainable design and construction. Non-strategic JLP Policy LP24 refers to design and residential amenity.

**Policy EDW3: Design** is a long policy covering numerous and varied criteria. In essence, it seeks to deliver locally distinctive development of a high quality that protects, reflects and enhances local character taking account of the NPPF.

The policy is supported by a Design Codes and Guidance document prepared by AECOM and this is referenced in the policy.

The policy could be more robust in that rather than having regard to the guidelines, account should be taken of them. A modification is duly recommended.

Two further modifications are recommended to this policy. The first is a syntax correction and the second to future proof the policy.

The second policy in this section is **Policy EDW4: Pollution and Amenity**.

The NPPF indicates that policies should ensure new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.<sup>42</sup> In so doing, the NPPF refers to limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.<sup>43</sup> This policy seeks to ensure that these aims of the NPPF is realised.

In relation to residential amenity, the second part of the policy seeks to ensure that new development does not harm the amenity of adjacent users or cause new issues. There is a further consideration in that the NPPF is clear that new development should be integrated effectively with existing businesses and facilities and that these existing uses should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.<sup>44</sup> A modification is made to reflect this.

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<sup>41</sup> NPPF para 135

<sup>42</sup> Ibid para 191

<sup>43</sup> Ibid

<sup>44</sup> Ibid para 193

The next policy is **Policy EDW5: Energy Sustainability and Climate Change**. To help increase the use and supply of renewable and low carbon energy and heat, the NPPF states that plans should provide a positive strategy for energy from these sources.<sup>45</sup> Community-led initiatives taken forward through neighbourhood planning should be supported by local planning authorities, including for developments outside areas identified in local plans or other strategic policies.<sup>46</sup>

JLP Policy SP10 requires all development to mitigate and adapt to climate change including through the delivery of decentralised energy systems powered by renewable or low carbon source and associated infrastructure including community-led initiatives.

Non-strategic JLP Policy LP25 refers to energy sources, storage and distribution supporting proposals subject to their impact on various matters such as landscape, highway safety, amenity, heritage and so on.

Policy EDW5 supports renewable, decentralised and community energy schemes subject to seven criteria.

The next policy is **Policy EDW6: Protecting and Enhancing Biodiversity**.

The NPPF states that policies should contribute to and enhance the natural and local environment including through the protection of valued landscapes and sites of biodiversity value, recognising the intrinsic character and beauty of the countryside and, minimising impacts on, and providing net gains for, biodiversity.<sup>47</sup>

To protect and enhance biodiversity, the NPPF encourages plans to identify and map and safeguard local wildlife rich habitats and ecological networks, wildlife corridors and promote priority habitats as well as pursuing net gains for biodiversity.<sup>48</sup>

JLP Policy SP09 requires development to support and contribute to the conservation, enhancement and management of the natural and local environment and networks of green infrastructure including landscape, biodiversity, geodiversity and the historic environment and historic landscapes. Amongst other things, it also expects all development, through biodiversity net gain, to protect and enhance biodiversity ensuring measures are resilient to climate change.

Non-strategic JLP Policy LP16 refers to biodiversity and geodiversity including the loss of irreplaceable habitats and ancient woodland and biodiversity net gain. Non-strategic JLP Policy LP17 seeks to conserve and enhance landscape character including through the reinforcement of local distinctiveness and the identity of individual settlements, consideration of topographical impact and dark skies.

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<sup>45</sup> NPPF para 160

<sup>46</sup> Ibid para 161

<sup>47</sup> Ibid para 180

<sup>48</sup> Ibid para 185

The Plan area has two Sites of Special Scientific Interest (SSSI) and a number of other nature sites. The Parish Council has commissioned the Suffolk Wildlife Trust to prepare a report on biodiversity within the Parish.

Policy EDW6 is a long policy which seeks to protect and enhance biodiversity through biodiversity net gain. It is clear in its intention and takes a pragmatic approach to development proposals seeking mitigation where appropriate.

The policy has regard to the NPPF's principles regarding harm to biodiversity.<sup>49</sup>

The last policy in this section is **Policy EDW7: Heritage Assets – Designated and Non-Designated**.

The NPPF is clear that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.<sup>50</sup> It continues<sup>51</sup> that great weight should be given to the assets' conservation when considering the impact of development on the significance of the asset.

In relation to non-designated heritage assets, the NPPF is clear that the effect of any development on its significance should be taken into account and that a balanced judgment will be needed having regard to the scale of any harm or loss and the significance of the heritage asset.<sup>52</sup>

Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes which have heritage significance, but do not meet the criteria for designated heritage assets. PPG advises there are various ways that such assets can be identified including through neighbourhood planning.<sup>53</sup>

However where assets are identified, PPG advises that it is important decisions to identify them are based on sound evidence.<sup>54</sup> There should be clear and up to date information accessible to the public which includes information on the criteria used to select assets and information about their location.<sup>55</sup>

JLP Policy SP09 expects development to contribute to the conservation, enhancement and management of the natural and local environment including the historic environment and historic landscape. Non-strategic JLP Policy LP19 sets out detail relating to the historic environment.

Policy EDW7 seeks to protect and enhance heritage assets and identifies one non-designated heritage asset; the Icehouse. Appendix B of the Plan contains details about

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<sup>49</sup> NPPF para 185

<sup>50</sup> Ibid para 195

<sup>51</sup> Ibid para 205

<sup>52</sup> Ibid para 209

<sup>53</sup> PPG para 040 ref id 18a-040-20190723

<sup>54</sup> Ibid

<sup>55</sup> Ibid

the asset and assesses it against Historic England advice. I consider it is appropriately designated.

With these modifications, I consider **Policies EDW3 – EDW7** will meet the basic conditions by having regard to national policy, adding a local layer of detail and being in general conformity with the JLP and Policies SP09 and SP10 in particular and helping to achieve sustainable development.

- **Change the first sentence of Policy EDW3 to read: “Proposals for new development *must* have regard *and take account of* the guidelines set out...”**
- **Delete the second “...architectural diversity of the...” in criterion b) of Policy EDW3**
- **Add the words “(or any successor document)” after the first reference to the Suffolk Guidance for Parking 2023 in criterion s) of Policy EDW3**
- **Amend the third paragraph of Policy EDW4 to read:**  
  
**“Proposals for all new development (including extensions, conversions and changes of use) should not adversely affect the amenity *or operation* of adjacent users, exacerbate existing or cause new pollution problems (air, noise, dust, vibration, and light) either from the use itself, its built form or that from traffic generated. *Where the operation of an existing business or community facility could have a significant adverse effect on new development in its vicinity, it is expected that the agent of change provides suitable mitigation measures.*”**

## **9. Landscape**

There is one policy in this section, **Policy EDW8: Landscape**.

The NPPF states that policies should contribute to and enhance the natural and local environment including through the protection of valued landscapes and sites of biodiversity value, recognising the intrinsic character and beauty of the countryside and, minimising impacts on, and providing net gains for, biodiversity.<sup>56</sup>

The policy seeks to ensure that landscape considerations, including gaps between the hamlets, are valued and taken into account.

The Plan explains that part of the Parish fell within the River Box Special Landscape Area (SLA), a designation originally identified in the 1980s and rolled forward since then, but not taken forward in the JLP. The area was identified because of its landscape sensitivity and scenic quality.

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<sup>56</sup> NPPF para 180



The policy identifies this area as an Area of Local Landscape Sensitivity (ALLS). This is shown on Figure 27 on page 65 of the Plan.

I saw at my visit that this area is distinguishable from surrounding land and the remainder of the Parish. The local importance of this landscape was evident. I consider that the area has been appropriately designated and justified in the supporting text. It should be noted that the policy does not prevent development per se, but rather seeks to ensure that the special qualities of the ALLS are conserved.

The last part of the policy refers to views of the Grade 1 listed Church of St Mary the Virgin and its setting. It seeks to ensure that new development does not adversely harm these views. I saw at my site visit that the Church is on elevated land and there are views from the Church across the surrounding countryside and views to the Church from various places; it is a landmark.

**Policy EDW8** meets the basic conditions by having regard to national policy, being in general conformity with the JLP and Policy SP09 and helping to achieve sustainable development. No modifications are recommended.

### ***10. Access and Community***

There are three policies in this section.

**Policy EDW9: Community Facilities** refers to both the protection of existing facilities and offers support for new or enhanced provision.

To support a prosperous rural economy, the NPPF expects planning policies to enable the retention and development of accessible local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.<sup>57</sup> It also states that policies should guard against the unnecessary loss of valued facilities and services as part of its drive to promote healthy and safe communities, particularly where this would reduce the community's ability to meet day to day needs.<sup>58</sup>

Non-strategic JLP Policy LP28 supports new accessible local services where they are well related to and meets the needs of the community and resists the loss of existing facilities.

The policy identifies five facilities; the Church, the Parish Hall, the Millennium Green, the Play Area and the Public House. It protects these facilities resisting their loss unless it can be satisfactorily demonstrated that the use is no longer viable or an equivalent or better facility is provided in a suitable location.

BDC point out that Policy EDW9 refers to a 12-month marketing period whereas non-strategic JLP Policy LP28 refers to six months and requests this is amended. Although

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<sup>57</sup> NPPF para 88

<sup>58</sup> Ibid para 97

that policy is non-strategic, it supports the strategic policies. My attention has also been drawn to other neighbourhood plan examinations where the period has been changed to be in line with JLP Policy LP28. Furthermore little explanation of why 12 months might be more appropriate in Edwardstone has been given. A modification is therefore recommended.

The second part of the policy supports in principle new facilities.

**Policy EDW10: Local Green Spaces** seeks to designate six areas of Local Green Space (LGS). They are shown on the Policies Map and more detailed information is contained in the Plan at Appendix C.

The NPPF explains that LGSs are green areas of particular importance to local communities.<sup>59</sup> The designation of LGSs should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.<sup>60</sup> It is only possible to designate LGSs when a plan is prepared or updated and LGSs should be capable of enduring beyond the end of the plan period.<sup>61</sup>

The NPPF sets out three criteria for green spaces.<sup>62</sup> These are that the green space should be in reasonably close proximity to the community it serves, be demonstrably special to the local community and hold a particular local significance and be local in character and not be an extensive tract of land. Further guidance about LGSs is given in PPG.

**Millennium Green** is located close to the public house and built up area of Mill Green. It is valued for its community and recreation uses. I saw at my visit that this is a self-contained area bounded by hedgerows. It is grassed with picnic tables which were being used at the time of my visit.

The **play area** lies adjacent to the Millennium Green and has recreational and community value. This fenced play area has a variety of equipment including a climbing wall.

The **War Memorial Green** is located at the junction of Mill Green and Sherbourne Street. It is valued for its historical significance and as an informal amenity area.

The **churchyard of the Church of St Mary the Virgin** is valued for its historical and communal significance. I found this to be a tranquil place with pleasant views.

The new **Community Orchard at Mill Green and open space adjacent** (counted as two LGS areas) is valued as a new community orchard with communal, amenity and biodiversity value. I saw these spaces were pleasant areas close to housing and with

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<sup>59</sup> NPPF para 105

<sup>60</sup> Ibid

<sup>61</sup> Ibid

<sup>62</sup> Ibid para 106

easy footpath access.

Based on the information in Appendix C and my site visit, in my view, all of the proposed LGSs meet the criteria in the NPPF satisfactorily. No representations have been made that lead me to a different conclusion.

The proposed LGSs are demonstrably important to the local community, are capable of enduring beyond the Plan period, meet the criteria in paragraph 106 of the NPPF and their designation is consistent with the local planning of sustainable development and investment in sufficient homes, jobs and other essential services given other policies in the development plan and this Plan.

Turning now to the wording of the policy, it designates the LGSs and states that development in the LGSs will be consistent with national policy for Green Belts. This has regard to the NPPF which is clear that policies for managing development within a Local Green Space should be consistent with those for Green Belts.<sup>63</sup>

The supporting text refers to Figure 28 and this should be Figure 29 and Appendix B which should be Appendix C.

The last policy in this section is **Policy EDW11: Accessibility**.

This policy promotes connectivity seeking to improve accessibility both from a perspective of promoting sustainable transport, but also in respect of health and wellbeing.

The NPPF is clear that planning policies should protect and enhance public rights of way (PROW) and access taking opportunities to provide better facilities for users.<sup>64</sup> The NPPF seeks to enable and support healthy lifestyles including through the protection and enhancement of PROW including through adding links to existing networks.<sup>65</sup>

Such networks can also help with providing opportunities and options for sustainable transport modes.<sup>66</sup>

Non-strategic Policy LP29 supports active travel and the protection and enhancement of PROW networks.

This policy sets out to achieve the ambitions of the NPPF.

With a modification to amend the marketing period in Policy EDW9 and a minor modification to correct two references within the supporting text, **Policies EDW9, EDW10 and EDW11** meet the basic conditions by having regard to national policy, being on general conformity with the JLP and helping to achieve sustainable development.

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<sup>63</sup> NPPF para 107

<sup>64</sup> Ibid para 104

<sup>65</sup> Ibid para 104

<sup>66</sup> Ibid paras 108, 110

- Change criterion i) of Policy EDW9 to read: “i) *a sustained marketing period, normally of six months*, in appropriate publications (online, in print, and through agencies) for the permitted and similar uses, using an appropriate agent taking account of the nature and type of the asset; and”
- Change the references to “Figure 28” and “Appendix B” in paragraph 10.7 on page 70 of the Plan to “Figure 29” and “Appendix C” respectively

## **12. Implementation and Monitoring**

This is a short section which explains about the Community Infrastructure Levy and the use of the Plan including the potential for monitoring. Monitoring of neighbourhood plans is not yet mandatory. However, I welcome this intention as good practice.

### **Appendices**

There are five appendices. Appendix A is Steering Group members. Appendix B contains details of the non-designated heritage asset, the Ice House. Appendix C contains details of the LGSs. Appendix D is a useful glossary. Appendix E is the Policies Map.

## **7.0 Conclusions and recommendations**

I am satisfied that the Edwardstone Neighbourhood Development Plan, subject to the modifications I have recommended, meets the basic conditions and the other statutory requirements outlined earlier in this report.

I am therefore pleased to recommend to Babergh District Council that, subject to the modifications proposed in this report, the Edwardstone Neighbourhood Development Plan can proceed to a referendum.

Following on from that, I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan area. I see no reason to alter or extend the Plan area for the purpose of holding a referendum and no representations have been made that would lead me to reach a different conclusion.

I therefore consider that the Edwardstone Neighbourhood Development Plan should proceed to a referendum based on the Edwardstone Neighbourhood Plan area as approved by Babergh District Council on 30 March 2021.

*Ann Skippers* MRTPI  
Ann Skippers Planning  
21 August 2024

## **Appendix 1 List of key documents specific to this examination**

Edwardstone Neighbourhood Plan 2021 – 2037 Submission Version March 2024

Basic Conditions Statement March 2024

Consultation Statement March 2024

Strategic Environmental Assessment Screening Opinion Final Report November 2023 (LUC)

Habitats Regulations Assessment Screening Report Final Report November 2023 (LUC)

Strategic Environmental Assessment and Habitats Regulation Assessment Screening Determination Notices February 2024 (BDC)

Data Profile March 2022

Design Codes and Guidance Final report update February 2024 (AECOM)

Green corridors and spaces assessment 2023 September 2023 (Wilder Ecology, SWT Trading Ltd)

Regulation 15 Checklist (BDC)

Babergh and Mid Suffolk Joint Local Plan Part 1 adopted 21 November 2023

**List ends**