



Babergh District Council

Little Waldingfield Neighbourhood Development Plan

Submission Consultation Responses [Updated on 4 December 2020]

On the 25 September 2020, Little Waldingfield 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 Wednesday 14 October until Friday 27 November 2020.

Nine organisations / individuals submitted written representations. They are listed below and copies of their representation are attached.

Now also included by mutual agreement is a late representation from Historic England.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Natural England
(3)	Anglian Water
(4)	Highways England
(5)	National Grid (via Avison Young)
(6)	Suffolk Wildlife Trust
(7)	Water Management Alliance
(8)	Mr Sheppard (Resident)
(9)	AF Machinery Ltd
(10)	Historic England * <i>Late Representation</i> *

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(1) SUFFOLK COUNTY COUNCIL

Date: 25 November 2020
Enquiries to: Georgia Teague
Tel: [REDACTED]
Email: [REDACTED]



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

Dear Mr Hobbs,

Submission version of the Little Waldingfield Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Submission version of the Little Waldingfield 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 Regulation 14 consultation, SCC recommended that there should be considerations for adaptable housing, in order to meet the demand for smaller properties for older residents, as highlighted by the AECOM Housing Needs Survey.

The AECOM survey and paragraph 6.13 highlight the desire to downsize, and the “demand for slightly smaller medium homes (2-3 bedroom homes), which may increase significantly in the Neighbourhood Area due to a growing older population” as stated in paragraph 6.18 of the Little Waldingfield Neighbourhood Plan, which indicates that there is in fact a need for such properties

In order to meet the needs of an aging population the plan should support housing build to the M4(2) standard referenced in Footnote 46 of the NPPF which states “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...”.

It is accepted that Neighbourhood plans cannot *require* dwellings built to these standards, however they can support them.

Homes that are built to M4(2) standards can be adapted to be more accessible for elderly people who are more frail, and those living with disabilities and mobility issues, and therefore are suitable to meet the needs of the occupants through their lifetime.

Therefore, the following statement should be added into either Policy LWD5 Measurements for New Housing Developments, or Policy LWD6 Housing Needs to meet basic condition a) and b).

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

Transport

At pre-submission consultation stage, SCC suggested that the plan ought to include support for some elements of on-street parking provisions. In the Consultation Statement, the parish have responded stating: “It is not considered that the nature of development that could take place in the village should allow for on-street parking given the current narrow roads.”

However, SCC believe that our previous statement has been misinterpreted – we are not suggesting that on-street parking should be incorporated into existing and established roads, which are narrow. SCC is requesting that on-street parking provisions ought to be included in new developments, as inconsiderate street parking from non-residents, or households with multiple vehicles, can cause danger and obstructions to road users and pedestrians. Having well designed and integrated on-street parking can help to reduce inconsiderate parking, which can restrict access for emergency services and refuse collections, and parking on pavements that hinder pedestrian access and safety.

In order to meet part a) of the Basic Conditions (to be in conformity with paragraph 91 of the NPPF, by creating healthy, inclusive and safe places for all), the Little Waldingfield Neighbourhood Plan should be amended to follow the direction regarding on-street parking as stated in the Suffolk Guidance for Parking 2019¹.

¹ <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf>

Therefore, it is recommended that part g of Policy LWD15 Design Considerations is amended to state:

“ g) Produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that all vehicle parking is provided in accordance with adopted guidance and designed to be integrated into the development without creating an environment dominated by vehicles, *as well as a proportion of parking provided on-street within all new development, but is well designed, located and integrated into the scheme to avoid obstruction to all highway users or impeding visibility*, and seek always to ensure satisfactory permeability through new housing areas, connecting any new development into the heart of the existing settlement;”

I hope that these comments are helpful. 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

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(2) NATURAL ENGLAND

Date: 27 November 2020
Our ref: 330731
Your ref: Little Waldingfield NP Reg 16 Consultation



communityplanning@babberghmidsuffolk.gov.uk

FAO Paul Bryant
BY EMAIL ONLY

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

T 0300 060 3900

Dear Mr Bryant

Consultation under Reg 16 of Neighbourhood Planning (General) Regulations 2012 (as amended): Submission draft Little Waldingfield Neighbourhood Development Plan 2018 - 2036

Thank you for your consultation on the above dated 13 October 2020 .

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 comments on this draft neighbourhood plan further to those we have already provided in our correspondence of 22/2/17 ref 208348, and 22/7/20 ref 318472.

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

Yours sincerely,

Patrick Robinson
Norfolk and Suffolk Area Team

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(3) ANGLIAN WATER

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

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

Section Two: Your representation(s)

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

Paragraph No.		Policy No.	LWD1
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

Reference is made to development being permitted in the designated countryside where it is essential for the operation of agriculture, horticulture, forestry, outdoor recreation and other exceptional uses including utilities infrastructure.

Anglian Water's existing infrastructure is often located in the countryside at a distance from built up areas.

We had previously asked that the infrastructure provided by Anglian Water for our customers is an exceptional use for the purposes of this policy as set out in our previous representations on the Neighbourhood Plan. Therefore, we are supportive of the wording in the final paragraph of this policy.

However, we note that uses considered to be acceptable in the countryside appear to have a demonstrate a local need to be located in the countryside. Anglian Water's existing infrastructure is often located in the countryside at a distance from built up areas.

Therefore, we don't consider it is appropriate for Anglian Water to have to demonstrate a need for essential infrastructure for our customers to be located in the countryside. As such this requirement should be removed from the wording of the policy.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

It is therefore proposed that Policy LWD1 be amended as follows:

'Proposals for new development located outside the Settlement Boundary will only be permitted which complies with Policy LWD4 or which is essential for the operation of existing businesses, agriculture, horticulture, forestry, outdoor recreation or utilities infrastructure, ~~where: i) it can be satisfactorily demonstrated that there is an identified local need for the proposal; and ii) it cannot be satisfactorily located within the Settlement Boundary.'~~

(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 Little Waldingfield NDP by Babergh District Council	x

Signed: Stewart Patience

Dated: 19th November 2020

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.	LWD 16
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support **Support with modifications** Oppose Have Comments

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

We note that Policy LWD 16 has been amended to include reference to water re-use measures in response to comments from Suffolk County Council and a number of residents who responded to the previous consultation.

Anglian Water as water undertaker for the parish is supportive of including reference to water re-use measures but considers the text should be amended somewhat to be clear what measures are being referred to in this context and how it relates to the requirements outlined in Policy LWD 17.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

It is therefore proposed that Policy LWD 16 be amended as follows:

'Proposals that include measures that ~~firstly~~, minimise **potable** water consumption, **such as water reuse and recycling systems including those identified in Policy LWD 17 and grey water recycling**, and maximise water use efficiency will be supported.'

(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 Little Waldingfield NDP by Babergh District Council	X

Signed: Stewart Patience

Dated: 19th November 2020

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.	9.6	Policy No.	LWD 17
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

In our previous comments we had asked that Policy LWD17 makes clear that the use of Sustainable Drainage Systems is the preferred method of surface water drainage.

We had also suggested that there is a need to distinguish between water re-use measures that can be integrated with SuDS and grey water recycling where used water is treated within homes.

We note that changes have made to address Anglian Water's previous comments relating to this policy.

Anglian Water is generally supportive of changes made to Policy LWD 17 but notes that reference to grey water recycling has been omitted from the policy. We have therefore suggested changes to Policy LWD16 to ensure that grey water recycling is included within the Neighbourhood Plan.

In addition, we also suggested a changes to the wording of Policy LWD 17 and related supporting text make it clear that SuDs are expected to be incorporate within all new developments wherever possible and that great water recycling is distinct from other water re-use measures.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

It is therefore proposed that Policy LWD 17 be amended as follows:

'Proposals should, ~~as appropriate~~ include the use of above-ground open Sustainable Drainage Systems (SuDS).'

Similarly, it is proposed that paragraph 9.6 be amended as follows:

'New development will be required, ~~where appropriate~~, to make provision for the attenuation and recycling of surface water and rainwater in through Sustainable Drainage Systems (SuDS) that might include on-site rainwater and stormwater harvesting ~~and greywater recycling~~, and the management of run-off and water management in order to reduce the potential for making the situation worse.'

(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 Little Waldingfield NDP by Babergh District Council	X

Signed: Stewart Patience

Dated: 19th November 2020

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(4) HIGHWAYS ENGLAND

E from: Planning EE <PlanningEE@highwaysengland.co.uk>

Rec'd: 14 October 2020

Subject: Consultation under Reg' 16 Little Waldingfield NDP Consultation Response

Dear Sir/Madam

Thank you for your consultation on the above Neighbourhood Development Plan.

We have reviewed the details and information provided. Due to the area covered by the Neighbourhood Development Plan being remote from the Strategic Road Network (SRN), there is unlikely to be any adverse effect upon the SRN.

Consequently, we offer **No Comment**.

Kind Regards

JARROD GOY

Spatial Planning

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

Web: <http://www.highways.gov.uk>

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Our Ref: MV/ 15B901605

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

23 November 2020

avisonyoung.co.uk

Babergh Mid Suffolk Council
communityplanning@baberghmidsuffolk.gov.uk
via email only

Dear Sir / Madam
**Little Waldingfield Neighbourhood Plan Regulation 16 Consultation
October – November 2020
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:

plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team
Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

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(6) SUFFOLK WILDLIFE TRUST

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 Jacob Devenney
Job Title (if applicable):	Planning and Biodiversity Adviser
Organisation / Company (if applicable):	Suffolk Wildlife Trust
Address:	Brooke House Ashbocking Ipswich
Postcode:	IP6 9JY
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.	7/10 - 7.11	Policy No.	LWD 11
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

We are pleased to see that the Little Waldingfield Neighbourhood Plan recognises the importance of biodiversity and proposes measures to protect and enhance it. As stated within the National Planning Policy Framework (2019), development should seek to provide biodiversity net gain, so it is encouraging that this is recognised within the Parish. However, we believe that the plan can be expanded to further safeguard species and habitats from fragmentation caused by development.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Policy LWD 11 makes brief mention of restoring and repairing fragmented biodiversity networks does not give examples as to what this could entail. The policy should be expanded to enable establishing of ecological networks, both on a small scale and larger, landscape scale ecological networks. The importance of hedgerows, including those that link to the nearby SSSI woodlands, is recognised within the biodiversity section of the Neighbourhood Plan and these represent key features through which to develop a robust network for biodiversity. Other important features to consider include the networks of ponds, as well as streams. In accordance with the NPPF, ecological networks should be established to ensure that they are more resilient to current and future pressures. Therefore, protecting and enhancing all these features should be within this policy, to ensure the restoration and repair of fragmented biodiversity networks.

All future development proposals should apply the mitigation hierarchy to help deliver biodiversity net gain and reduce, as far as possible, negative effects on biodiversity. The mitigation hierarchy requires that in the first instance impacts are avoided, if they cannot be avoided then they should be mitigated for and only as a last resort should impacts be compensated. Enhancement and delivery of biodiversity net gain i.e. an approach that leaves biodiversity in a better state than before should be part of all development proposals, in line with the Government's emerging Environment Act predicted to receive Royal Assent in 2021. This should therefore be referenced within Policy LWD 11's objectives to ensure that future development will not have a negative effect on the area's biodiversity and will deliver a biodiversity net gain.

(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>Please be as brief and concise as possible ..</i>
<i>(Continue on separate sheet if necessary)</i>

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 Little Waldingfield NDP by Babergh District Council	<input checked="" type="checkbox"/>

Signed: Jacob Devenney	Dated: 23/11/2020
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(7) WATER MANAGEMENT ALLIANCE

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

Rec'd: 19 October 2020

Subject: Re: Consultation: Reg 16 Little Waldingfield NP (Babergh) – Our ref: 20_03256_P

Our Ref: 20_03256_P

Good Morning,

Thank you for consulting us on this, however the Parish of Little Waldingfield is located outside of any of our Internal Drainage Districts and Watershed Catchment areas, therefore the Board have no comments to make.

Kind Regards,

Jessica Nobbs

Senior Sustainable Development Officer

e: planning@wlma.org.uk



Water Management Alliance

Kettlewell House, Austin Fields Industrial Estate, King's Lynn, Norfolk, [PE30 1PH](https://www.gov.uk/postcodes/pe30), UK

t: +44 (0)1553 819600 | f: +44 (0)1553 819639 | e: info@wlma.org.uk | www.wlma.org.uk

Membership: [Broads Drainage Board](#), [East Suffolk Drainage Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [South Holland Drainage Board](#) and [Waveney, Lower Yare and Lothingland IDB](#).

In association with [Pevensy and Cuckmere Water Level Management Board](#), [Upper Medway IDB](#) and [Lower Medway IDB](#).

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(8) MR SHEPPARD

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 Sheppard
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.	5.8	Policy No.	LWD 1 - Spatial Strategy
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

I believe All housing planning applications should be treated the same, so I strongly disagree with a policy that permits affordable housing outside the LW Settlement Boundary. I see no valid reason for differing treatment for house planning applications to be enshrined within the LWNP planning policy, at least not without an explicit and informed mandate from the residents of Little Waldingfield as to why this should be so.

I carefully considered the Neighbourhood Plan Response to this point before writing this comment, concluding that it simply did not address the primary issue, namely permitting affordable housing outside the LW Settlement Boundary whilst opposing all other housing applications.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

The Policy LWD1 reference to Policy LWD4 should be removed, so that only the following proposals for development outside the Settlement Boundary would be supported by the NP:

'That which is essential for the operation of existing businesses, agriculture, horticulture, forestry, outdoor recreation, or utilities infrastructure'.

(Continue on separate sheet if necessary)

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

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.	6.11	Policy No.	LWD 4 - Affordable Housing on Rural Exception Sites
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

I believe All housing planning applications should be treated the same, so strongly disagree with a policy to permit just affordable housing outside of the LW Settlement Boundary.

I am not against exception sites for affordable housing, but believe that all such sites should either be within the LW Settlement Boundary or equal treatment should be given to market housing applications in regard to their location within the parish.

From villager comments on the draft NP, I note that many other respondents are also against this NP policy proposal.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Policy LWD 4 should be amended such that it applies only to Rural Exception Sites designated Within the LW Settlement Boundary.

(Continue on separate sheet if necessary)

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

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.	8.7 / 8.8	Policy No.	LWD 14 - Holbrook Park Special Character Area
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

Based upon the comments previously made by SRL Technical Services Ltd, I believe that much greater weight should be given to the needs of business, which at the end of the day provide livelihoods for us all.

In my view it is quite likely that the Hall itself would not be around today had it not been bought, managed and cared for by SRL some 50 years ago; they should therefore be congratulated rather than punished, by having to comply with artificial and unnecessary constraints.

SRL is a successful business, but like all businesses, are subject to ever changing external pressures and events. The LWNP should not encumber what they may do in the future by placing restrictions that future development must enhance the parkland setting - its not a park.

It should also be noted that the buildings within the grounds of the Hall are virtually invisible from either road, with only the top floor and the chimneys of the hall itself visible on the skyline. On top of this, I am not aware of any nuisance caused by SRL's business, believing them to be good neighbours, so their continuation should be encouraged rather than discouraged.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

The special character area should simply encompass the Hall (which sadly has been messed around during its time as a care home with four sets of non-compatible window frames / finishes) and the private dwellings within the grounds of the 'park'.

The SRL site should be explicitly removed from this policy, so that this currently successful business is not encumbered by artificial LWNP 'parkland' constraints, which otherwise are very likely to inhibit their response to ongoing competition or future regulatory change, to the detriment of their business.

(Continue on separate sheet if necessary)

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

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.	There is no specific paragraph that references garden plots	Policy No.	LWD 15 - Design Considerations
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

I previously commented that "Little Waldingfield has some very large gardens which could, with care, be split, in order to provide for new single or small scale development".

The reply to my comment advised that "The Plan does not mandate against suitable proposals"; however, it clearly does, because paragraph 3 of the policy states that proposals will be supported where they "Do not involve the loss of gardens". Self evidently, proposals that do involve the loss of gardens (or parts thereof) will not be supported.

I am not in favour of wholesale conversion of gardens, but believe that sensible proposals which are sensitive to their garden setting and comply with all other LWNP policy considerations should be supported. Elderly villagers may be unable to look after large gardens and may need to release cash to pay for care needs; parcelling off parts of a garden for a new dwelling would make their lives easier and also provide an ability for more people to live within the village.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Paragraph c of this policy should be reworded as follows:

Proposals will be supported where they:

Do not involve the loss of important open, green or landscaped areas, which make a significant contribution to the character and appearance of that part of the Village.

(Continue on separate sheet if necessary)

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

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

Support Support with modifications Oppose Have Comments

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

I previously commented that objective 1 of this section should be extended to read as follows:

Have a positive effect on the environment, by promoting actions that contribute to mitigating the climate crisis, reduce the carbon footprint and reduce water consumption.

Unfortunately the NP response was that “this is not considered necessary, as reducing water consumption is part of mitigating the Climate Crisis”.

Strictly speaking, and for many parts of the world such as the UK, I do not believe that reducing water consumption will have a meaningful impact on the Climate Crisis, though clearly this will not be the case in hotter climates where, for example, fresh water is obtained via hugely energy consuming desalination plants.

Water is a precious and scarce resource that should be managed better in order to avoid future water shortages, particularly in areas with low rainfall, such as Suffolk.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

The first objective of this section of the NP should be amended as follows:

- b. Have a positive effect on the environment, by promoting actions that contribute to mitigating the Climate Crisis, achieving Net Zero greenhouse gas emissions, reducing our carbon footprint and reducing our water consumption.

(Continue on separate sheet if necessary)

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

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.	LWD 19 - Protecting existing services etc
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

I previously commented as follows:

Please correct the typo after sub section b of LWD19 'Of the needs of the needs ' should be amended to read something like 'of the current and likely future needs

The NP response agreed and indicated that the fourth paragraph would be revised, but this revision seems to have been missed.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

A revised paragraph in line with the NP response to my comments should be incorporated, as per the following:

Amend Policy LWD 19 fourth paragraph as follows:

Any replacement provision should take account of the current and projected future needs of the village and the current standards of open space and sports facility provision adopted by the local planning authority.

(Continue on separate sheet if necessary)

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

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.	Appendix Three	Policy No.	Housing Permissions in LW
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

This new appendix is a welcome addition to the NP, but unfortunately the Priory Farm application for conversion of a farm building into a private residence has been double counted, by being included within both sections, as follows:

Permissions not completed as at 1 April 2018 as identified in the Babergh Draft Strategic Housing and Economic Land Availability Assessment - July 2019

- Reference DC/17/03214/FUL

Net new dwellings granted planning consent between 1 April 2018 and 1 January 2020

- Reference DC/18/03306/FUL

Checking the BMS Planning Search identifies the application reference DC/18/03306, which then references the earlier planning application reference DC/17/03214. These two applications are linked and in fact are one and the same - only one new dwelling is being created.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Either the earlier application should be removed from the appendix, or notes should be added to both rows to show that they are linked applications, and one of the Totals should be reduced by one.

(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 Little Waldingfield NDP by Babergh District Council	X

Signed: [Mr] Sheppard

Dated: 27th October 2020

[PLEASE NOTE: THIS PAGE IS INTENTIONALLY BLANK]

(9) AF MACHINERY LTD

E from: AF Machinery Ltd
Rec'd: 26 November 2020
Subject: Church Field, Little Waldingfield
Attach: Turley _ Implications of Proposed Changes to the Standard Method.pdf
Ufm28_Formal_Acknowledgment[2].pdf

Dear Sir

I wish to argue at appeal on the basis that:

- The existing settlement boundaries are outdated and carry limited weight.
- The emerging Local Plan has considered the site suitable for development (see SHELAA dated October 2020 at site ref. SS0874). The latest draft does not include the site allocation but this carries limited weight as an emerging document and the site clearly meets the 'sustainable development' test under the NPPF.

Representations to be made to the Neighbourhood Plan include:

Paragraph 3.3 acknowledges that the District Council are currently preparing a new Joint Local Plan, however the NP has been prepared based on the existing adopted Local Plan. This is justified due to the fact that the NP *"is likely to be completed before the Joint Local Plan is adopted, regard has been had to the adopted Local Plan in preparing the Neighbourhood Plan while not seeking to contradict the emerging strategic policies of the Joint Local Plan"* (para. 3.6).

Policy LWD1 (Spatial Strategy)

The NP uses the existing Local Plan settlement boundary in order to form the basis for their housing policies. Appeal case precedent has established that Babergh DC's current housing policies are outdated and therefore the settlement boundary policies carry limited weight. The emerging Joint Local Plan contains an altered settlement boundary. The NP justifies proceeding with its current timeframe on the basis that it *"is likely to be adopted before the Joint Local Plan is adopted"*.

The Joint Local Plan is due to be adopted in Winter 2021 (see Babergh DC's Local Development Scheme) and the NP is due to be adopted after the Village Referendum in May 2021, assuming this is voted in favour. It is illogical to adopt a NP having invested significant time and resources which contains housing policies based on an outdated Local Plan, knowing that within a few months the new Joint Local Plan will be adopted which will directly undermine the settlement boundary and housing policies contained within the NP document.

Section 6 – Housing

Paragraph 6.4 – The NP acknowledges that the 2019 'Preferred Options' Joint Local Plan included the Land to the east of The Street within the settlement boundary, however then continues to state their objection. It is blatantly obvious that the NP preparation is being rushed in order to try and undermine any potential site allocations within the emerging Joint Local Plan. This is being done at the expense of ensuring its overall compliance with the emerging Joint Local Plan and will only weaken its weight as a planning consideration in the long-term. This is not in the interests of the local residents and is not an efficient use of resources.

The District Council's SHELAA Assessment (October 2020) concluded that the Land to the East of the Street (site SS0874) is 'potentially suitable' for development, however the following constraints were identified: Highways; Heritage; TPOs; and Open Space. These issues have all been addressed within a recent planning application (ref. DC/20/04728) and therefore the site can be deemed suitable for development.

Policy LWD2 (Housing Development)

Paragraph 6.3 notes that the District Council's Preferred Options document proposed a minimum of 16 new homes. However, Policy LWD2 only makes provision for 10 new dwellings. There is no planning or evidence based justification for this lower figure, only reference to a residents survey.

This will not carry significant weight in future planning decisions as it is not supported by any robust evidence. Clearly, if local residents surveys were the sole source to determine how many new houses were built within their own villages, there would be an even greater housing shortfall than is currently being faced across the District.

In addition, there is no reference to the emerging new proposed methodology for calculating housing need. This will result in Babergh's housing requirement increasing to 789 homes per year*, more than double their existing requirement and just under double the figure if the current method had been used by the Council. The NP is not facing the realities surrounding the drastic and significant housing shortfall in the District and has produced a weak housing figure that simply represents the sentiment of local residents, which is generally inclined towards less development.

*Turley evidence assessment (see attached)

Local Authority	Outcome of proposed method	Outcome of current method	Existing housing requirement	Peak delivery since 2001
Babergh	789	416	325	579

Policy LWD9 (Local Green Spaces); Policy LWD10 (Important Views); and Policy LWD19 (Open Space)

The Land to the east of The Street clearly does not meet the NPPF definition requirements of Local Green Space. Allocating the specific area of land that is the subject of a potential site allocation and current planning application is a transparent attempt to undermine the granting of planning permission. Using the important designation of Local Green Space as a blunt tool to restrict development simply undermines the NP's credibility as a planning document.

The fact that the Local Green Space designation only applies to the current application site, in between the footpath and The Street, when there are numerous other areas within the village centre that better meet the definition, only serves to support the assertion that it is incorrectly being used as a tool to restrict development.

In its current form, the policies are therefore unsound and would therefore be subject to challenge by way of judicial review.

Kind regards

Jenn Tortice
Farm Secretary
AF Machinery Ltd

Implications of proposed changes to the standard method of assessing housing need

August 2020



Turley

The Government is proposing a new standard method for assessing local housing need, to replace the current method that has been in place since 2018. The proposals¹ are subject to consultation until 1 October 2020.

This document – produced in collaboration with the Land Promoters and Developers Federation (LPDF) – confirms the level of housing need implied by the new method for every local authority in England, grouped by region and listed in alphabetical order². This is compared to the outcome of the current method³, the peak level of housing delivery achieved in any year since 2001⁴ and existing housing requirements where applicable⁵. These metrics are colour coded to show, at a glance, whether the outcome of the proposed standard method is **higher** or **lower**.

Regions

¹ Ministry of Housing, Communities and Local Government (August 2020) *Changes to the current planning system: consultation on changes to planning policy and regulations*

² Correct as of August 2020, but subject to change as new datasets are released

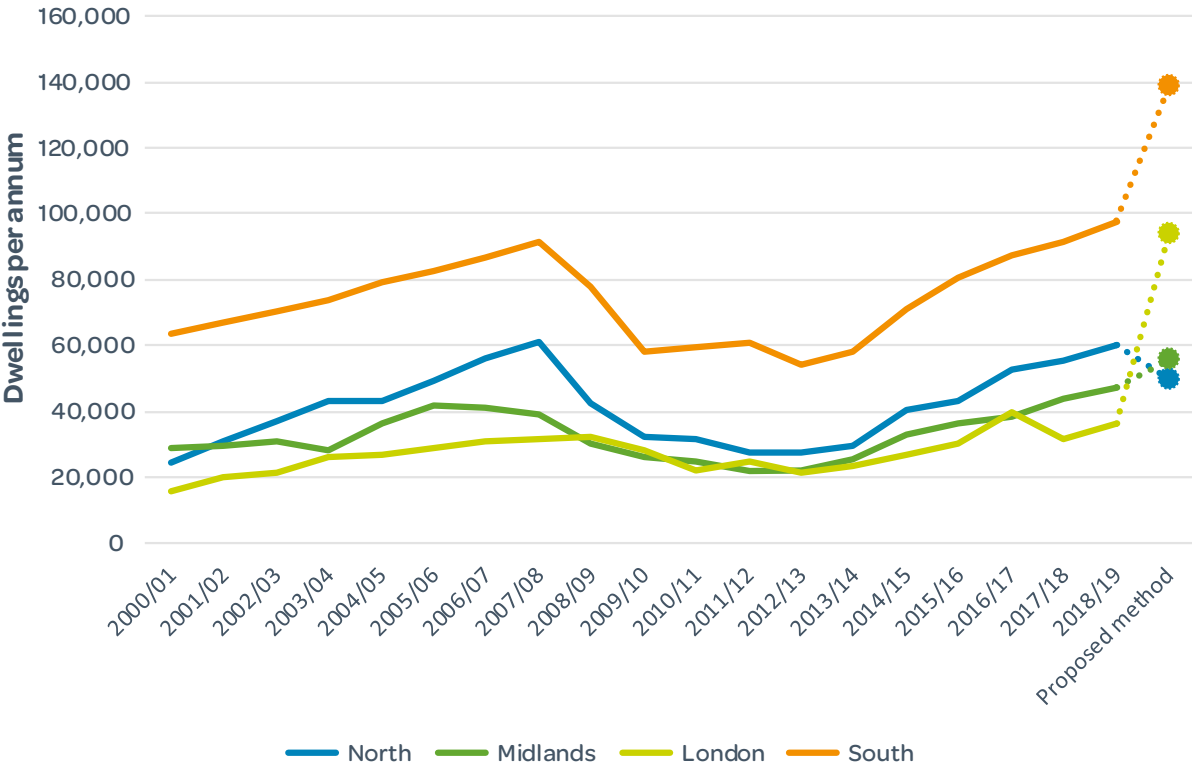
³ As of August 2020

⁴ Based on MHCLG data

⁵ Initially collated by MHCLG in September 2017, and since updated by Turley to reflect subsequently adopted requirements



A boost to past delivery, except in the north...



⁶ 11% have no adopted housing requirement according to MHCLG, and the residual 21% receive a figure lower than their existing requirement

North East

Local Authority	Outcome of proposed method	Outcome of current method	Existing housing requirement	Peak delivery since 2001
Darlington	253	165	482	625
Durham	1,140	1,266	-	1,528
Gateshead	494	445	425	943
Hartlepool	246	180	410	528
Middlesbrough	354	256	410	678
Newcastle upon Tyne	774	1,036	950	2,767
North Tyneside	884	803	790	965
Northumberland	1,172	651	-	1,802
Redcar and Cleveland	392	89	234	525
South Tyneside	435	341	168	450
Stockton-on-Tees	445	472	677	1,236
Sunderland	697	558	745	907

North West

Local Authority	Outcome of proposed method	Outcome of current method	Existing housing requirement	Peak delivery since 2001
Allerdale	320	106	304	480
Barrow-in-Furness	159	0	119	122
Blackburn with Darwen	346	154	625	639
Blackpool	303	121	280	368
Bolton	708	776	694	1,305
Burnley	224	62	194	335
Bury	673	601	-	940
Carlisle	286	193	565	678
Cheshire East	1,774	1,068	1,800	2,935
Cheshire West and Chester	1,659	584	1,100	2,546
Chorley	771	569	417	723
Copeland	154	11	277	242
Eden	133	95	242	660
Fylde	488	272	415	490
Halton	386	246	552	859
Hyndburn	165	56	213	196
Knowsley	415	261	450	840
Lancaster	417	410	700	628
Liverpool	1,154	1,558	-	3,485
Manchester	1,645	2,613	3,333	5,472
Oldham	805	693	289	529
Pendle	213	146	298	314
Preston	385	250	507	905
Ribble Valley	298	143	280	1,197
Rochdale	990	503	460	833
Rossendale	271	190	247	334
Salford	1,326	1,344	-	3,208
Sefton	695	623	640	606
South Lakeland	410	198	400	556
South Ribble	238	191	417	665
St. Helens	456	434	570	775
Stockport	1,098	1,079	495	738
Tameside	763	651	-	869
Trafford	1,239	1,369	578	953
Warrington	711	855	-	1,791
West Lancashire	277	193	324	543
Wigan	996	905	1,000	1,931
Wirral	898	779	-	1,052
Wyre	383	296	460	532

Yorkshire and the Humber

Local Authority	Outcome of proposed method	Outcome of current method	Existing housing requirement	Peak delivery since 2001
Barnsley	1,013	866	1,134	1,328
Bradford	1,211	1,704	2,476	2,337
Calderdale	587	800	-	1,311
Craven	224	150	230	461
Doncaster	961	546	1,230	1,745
East Riding of Yorkshire	1,221	908	1,400	1,982
Hambleton	349	196	260	546
Harrogate	579	364	637	659
Kingston upon Hull, City of	724	397	620	1,341
Kirklees	1,107	1,666	1,730	2,681
Leeds	2,387	2,787	3,247	3,427
North East Lincolnshire	470	211	702	625
North Lincolnshire	415	396	754	1,267
Richmondshire	124	12	180	375
Rotherham	736	566	958	1,187
Ryedale	357	184	200	321
Scarborough	339	172	450	825
Selby	589	342	450	869
Sheffield	1,733	2,131	1,352	3,429
Wakefield	1,982	970	1,600	2,114
York	763	1,026	-	1,296

East Midlands

Local Authority	Outcome of proposed method	Outcome of current method	Existing housing requirement	Peak delivery since 2001
Amber Valley	663	381	-	654
Ashfield	813	481	-	647
Bassetlaw	564	288	350	551
Blaby	1,148	345	380	743
Bolsover	446	224	272	366
Boston	443	249	310	580
Broxtowe	490	368	362	336
Charnwood	1,636	1,105	820	1,070
Chesterfield	323	229	380	528
Corby	799	506	460	691
Daventry	970	348	389	854
Derby	624	881	647	1,231
Derbyshire Dales	343	230	334	411
East Lindsey	819	423	558	999
East Northamptonshire	821	457	420	692
Erewash	344	392	368	701
Gedling	534	458	426	405
Harborough	1,238	550	640	729
High Peak	420	263	350	550
Hinckley and Bosworth	889	452	450	769
Kettering	853	526	520	801
Leicester	1,119	1,734	1,280	1,954
Lincoln	294	297	555	603
Mansfield	554	275	-	509
Melton	205	201	245	302
Newark and Sherwood	764	494	454	762
North East Derbyshire	419	252	-	507
North Kesteven	585	455	555	982
North West Leicestershire	1,153	359	481	971
Northampton	811	1,288	1,048	1,775
Nottingham	897	1,149	1,009	1,456
Oadby and Wigston	216	167	148	175
Rushcliffe	1,054	604	774	763
Rutland	307	122	150	317
South Derbyshire	1,209	548	742	1,218
South Holland	580	418	467	828
South Kesteven	839	732	650	914
South Northamptonshire	864	503	351	961
Wellingborough	535	348	350	448
West Lindsey	363	334	555	811

West Midlands

Local Authority	Outcome of proposed method	Outcome of current method	Existing housing requirement	Peak delivery since 2001
Birmingham	3,056	3,577	2,555	4,187
Bromsgrove	694	379	368	695
Cannock Chase	575	276	241	625
Coventry	2,676	1,722	1,230	1,499
Dudley	880	636	806	901
East Staffordshire	582	430	613	792
Herefordshire, County of	1,166	846	825	788
Lichfield	423	321	478	740
Malvern Hills	929	329	235	577
Newcastle-under-Lyme	395	355	285	570
North Warwickshire	439	171	203	337
Nuneaton and Bedworth	662	429	703	726
Redditch	368	174	337	482
Rugby	705	525	620	1,475
Sandwell	1,141	1,488	1,074	1,332
Shropshire	2,129	1,177	1,375	1,910
Solihull	1,011	807	-	836
South Staffordshire	364	254	175	371
Stafford	829	400	500	1,010
Staffordshire Moorlands	255	185	300	444
Stoke-on-Trent	684	500	570	1,008
Stratford-on-Avon	1,675	603	730	1,408
Tamworth	305	149	177	558
Telford and Wrekin	941	510	864	1,356
Walsall	823	882	629	1,895
Warwick	910	627	932	1,060
Wolverhampton	844	750	671	796
Worcester	290	362	283	611
Wychavon	1,396	497	442	1,288
Wyre Forest	353	231	200	594

East of England

Local Authority	Outcome of proposed method	Outcome of current method	Existing housing requirement	Peak delivery since 2001
Babergh	789	416	325	579
Basildon	820	1,001	-	816
Bedford	1,153	1,305	970	1,359
Braintree	776	857	273	835
Breckland	1,070	661	612	1,155
Brentwood	393	453	-	407
Broadland	922	517	706	772
Broxbourne	465	594	-	911
Cambridge	745	658	700	1,298
Castle Point	386	354	-	451
Central Bedfordshire	2,752	2,386	718	2,103
Chelmsford	1,557	946	700	1,256
Colchester	1,612	1,078	843	1,244
Dacorum	922	1,023	430	745
East Cambridgeshire	554	597	575	746
East Hertfordshire	1,122	1,145	839	917
East Suffolk	1,660	866	839	1,318
Epping Forest	868	953	-	564
Fenland	844	538	550	923
Great Yarmouth	373	357	420	407
Harlow	442	473	-	676
Hertsmere	668	716	266	630
Huntingdonshire	1,019	976	804	1,040
Ipswich	552	459	489	1,467
King's Lynn and West Norfolk	540	538	660	1,538
Luton	713	595	425	873
Maldon	623	289	-	317
Mid Suffolk	754	535	430	882
North Hertfordshire	625	973	-	687
North Norfolk	730	552	400	694
Norwich	502	598	477	1,049
Peterborough	1,282	926	972	1,342
Rochford	586	360	250	459
South Cambridgeshire	773	1,085	975	1,341
South Norfolk	1,832	893	929	1,212
Southend-on-Sea	1,324	1,181	325	749
St Albans	997	893	-	660
Stevenage	322	444	380	690
Tendring	1,141	770	550	915
Three Rivers	588	624	180	338
Thurrock	1,483	1,147	925	1,080
Uttlesford	1,231	706	-	983
Watford	533	787	260	712
Welwyn Hatfield	667	875	-	1,218
West Suffolk	743	800	886	1,250

South East

Local Authority	Outcome of proposed method	Outcome of current method	Existing housing requirement	Peak delivery since 2001
Adur	326	248	177	236
Arun	2,063	1,240	-	905
Ashford	1,211	970	1,093	1,022
Aylesbury Vale	2,197	1,398	-	1,758
Basingstoke and Deane	684	884	850	1,296
Bracknell Forest	805	614	557	755
Brighton and Hove	1,520	924	660	1,060
Canterbury	1,125	1,120	800	1,215
Cherwell	1,305	756	1,142	1,489
Chichester	1,120	753	435	690
Chiltern	619	343	139	353
Crawley	598	476	340	655
Dartford	1,441	776	865	1,162
Dover	1,279	596	505	745
East Hampshire	932	623	492	1,112
Eastbourne	486	675	240	833
Eastleigh	885	694	-	1,162
Elmbridge	774	633	225	444
Epsom and Ewell	604	577	181	517
Fareham	403	514	147	598
Folkestone and Hythe	1,043	752	350	1,339
Gosport	309	238	170	748
Gravesham	405	655	363	464
Guildford	733	787	562	605
Hart	512	286	423	705
Hastings	453	451	200	432
Havant	963	504	315	649
Horsham	1,715	920	800	1,392
Isle of Wight	1,045	688	520	1,622
Lewes	800	483	345	484
Maidstone	1,569	1,186	883	1,286
Medway	1,176	1,662	-	997
Mid Sussex	1,305	1,114	964	1,000
Milton Keynes	1,417	1,806	1,767	2,337
Mole Valley	563	453	188	608
New Forest	782	1,004	561	845
Oxford	656	762	400	804
Portsmouth	730	855	584	1,328

Local Authority	Outcome of proposed method	Outcome of current method	Existing housing requirement	Peak delivery since 2001
Reading	700	649	689	1,086
Reigate and Banstead	1,091	1,139	460	753
Rother	1,173	736	335	455
Runnymede	361	531	-	754
Rushmoor	401	260	436	586
Sevenoaks	820	711	165	502
Slough	597	863	313	1,034
South Bucks	433	431	125	569
South Oxfordshire	723	608	547	1,361
Southampton	832	1,002	815	1,616
Spelthorne	489	606	166	417
Surrey Heath	408	328	191	391
Swale	1,483	1,038	776	906
Tandridge	533	646	125	417
Test Valley	813	550	588	1,004
Thanet	1,023	1,085	-	1,007
Tonbridge and Malling	1,440	843	425	1,166
Tunbridge Wells	893	678	300	695
Vale of White Horse	1,447	661	1,028	1,615
Waverley	835	679	590	519
Wealden	1,199	1,225	450	864
West Berkshire	692	513	525	1,052
West Oxfordshire	653	563	660	839
Winchester	1,025	692	625	810
Windsor and Maidenhead	914	754	-	654
Woking	348	431	292	508
Wokingham	1,635	789	662	1,509
Worthing	871	885	200	482
Wycombe	889	764	546	814

South West

Local Authority	Outcome of proposed method	Outcome of current method	Existing housing requirement	Peak delivery since 2001
Bath and North East Somerset	1,216	648	722	1,245
Bournemouth, Christchurch and Poole	1,731	2,655	1,723	2,261
Bristol, City of	2,490	2,368	1,530	2,879
Cheltenham	528	531	546	791
Cornwall	4,054	2,820	2,625	3,427
Cotswold	1,209	487	420	911
Dorset	2,075	1,793	1,463	2,182
East Devon	1,614	928	950	1,089
Exeter	694	625	600	802
Forest of Dean	608	370	310	439
Gloucester	578	658	718	968
Isles of Scilly	0	0	-	0
Mendip	1,064	599	420	679
Mid Devon	641	367	340	550
North Devon	650	336	431	693
North Somerset	1,708	1,365	1,049	1,717
Plymouth	823	645	950	1,465
Sedgemoor	824	746	644	730
Somerset West and Taunton	1,231	691	995	1,082
South Gloucestershire	2,544	1,412	1,350	1,630
South Hams	769	355	385	551
South Somerset	612	685	725	1,058
Stroud	786	635	456	573
Swindon	1,466	1,030	1,467	2,327
Teignbridge	1,532	758	620	842
Tewkesbury	1,037	564	495	945
Torbay	635	586	495	623
Torridge	417	420	431	668
West Devon	278	321	385	591
Wiltshire	2,917	2,006	2,100	2,841

London

Local Authority	Outcome of proposed method	Outcome of current method	Existing housing requirement	Peak delivery since 2001
Barking and Dagenham	1,657	2,210	1,190	906
Barnet	5,744	3,971	1,867	2,209
Bexley	1,797	1,773	335	810
Brent	2,695	2,647	1,100	1,741
Bromley	2,487	897	641	952
Camden	5,604	1,568	1,120	1,208
City of London	116	114	110	437
Croydon	2,205	3,442	1,010	2,835
Ealing	2,247	2,362	933	1,754
Enfield	2,213	3,257	733	1,279
Greenwich	4,289	3,265	2,595	2,380
Hackney	5,031	3,004	1,160	2,388
Hammersmith and Fulham	2,289	1,286	1,031	1,531
Haringey	2,786	2,723	820	1,488
Harrow	1,336	1,880	233	1,229
Havering	1,975	1,910	535	1,012
Hillingdon	2,026	2,705	425	1,467
Hounslow	1,338	1,151	822	1,992
Islington	2,218	2,309	1,264	2,329
Kensington and Chelsea	3,285	998	733	984
Kingston upon Thames	1,526	1,510	375	537
Lambeth	2,341	1,673	1,195	1,558
Lewisham	3,735	3,095	1,069	1,798
Merton	1,333	1,519	320	648
Newham	3,644	3,616	2,867	2,505
Redbridge	3,084	1,572	1,123	1,022
Richmond upon Thames	2,247	441	315	942
Southwark	3,547	2,854	1,630	3,208
Sutton	1,233	598	427	697
Tower Hamlets	6,121	4,585	3,659	4,827
Waltham Forest	2,574	2,375	760	1,033
Wandsworth	3,059	2,414	1,724	2,738
Westminster	5,750	1,495	1,068	2,220

For more information or to set up a meeting please contact one of the team.

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 [linkedin.com/company/turley](https://www.linkedin.com/company/turley)

Turley

Sustainable Communities



Mr P Branton
2 Market Place
Hadleigh
IP7 5DN
United Kingdom

Please ask for	: Jamie Martin-Edwards
Direct line	:
Your reference	: 5217: Proposed Residential De...
Our reference	: DC/20/04728
E-mail	: planninggreen@baberghmidsuffolk.gov.uk

23rd October 2020

Dear Sir/Madam

APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/20/04728

Proposal: Application for Outline Planning Permission (some matters to be reserved, access to be considered) - Residential development comprising of 14No dwellings (including 4No affordable), with associated access and parking facilities.

Location: Land To The East Of, The Street, Little Waldingfield, Suffolk

I can confirm that your application received 22nd October 2020 has been registered with a start date of 23rd October 2020. I also acknowledge receipt of £[REDACTED] in payment for your application.

We aim to determine your application by 22nd January 2021 if by this date we have not given you notice of our decision (and you have not extended the time period for determination) you may appeal to the Planning Inspectorate. For further information on appeals please visit:

<http://www.babergh.gov.uk/planning/development-management/planning-appeals/>

If we feel that your application is likely to be rejected, then we will contact you in advance giving you the opportunity to withdraw the application within the timescale agreed with the case officer.

You can track your application using our website and receive notifications, for guidance on how to do this please visit: <http://www.babergh.gov.uk/planning/development-management/application-search-and-comment/guide-to-public-access/>. If you have provided your email address to us most subsequent communications will be to your email address, this includes your decision

(which will also be available on our website). If you do have any questions or queries regarding your application please contact the case officer named at the top of this letter.

Most applications are determined under the Council's scheme of delegation; however it may be necessary to refer your application to the Planning Committee, to find out more about this process please visit: <http://www.babergh.gov.uk/planning/development-management/planning-committee/>. A site notice will be posted within the vicinity of your application site. This must remain in place for 21 days following the date of posting, but can be removed after this time.



Babergh and Mid Suffolk District Councils
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www.midsuffolk.gov.uk

Please note: your application may be affected by the Community Infrastructure Levy (CIL), for further information please visit: <http://www.babergh.gov.uk/planning/community-infrastructure-levy-and-section-106/community-infrastructure-levy-cil/>

Yours faithfully

Philip Isbell

Chief Planning Officer – Sustainable Communities

If by 22nd January 2021 you have not been given a decision in writing, you can appeal to the Secretary of State under Section 78/195 of the Town and Country Planning Act 1990 by notice served within 6 months of this date. An appeal of this kind is not possible if your application is has already been notified to the Secretary of State or is still within an extended determination period agreed with you. You must use a form which you can get online from www.gov.uk/government/organisations/planning-inspectorate, or write to The Planning Inspectorate, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN. Alternatively, go to www.planningportal.gov.uk where you can obtain more information about making an appeal and submit an appeal online through the Appeals Casework Portal.



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(10) HISTORIC ENGLAND (Late Rep)



Historic England

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

Direct Dial: [REDACTED]

Our ref: PL00069618

4 December 2020

Dear Mr Bryant

Ref: Little Waldingfield Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission Draft of the Little Waldingfield Neighbourhood Plan. We apologise for the additional time it has taken to respond to this consultation.

We welcome this neighbourhood plan, and particularly its emphasis on the protection of Little Waldingfield's historic environment in many policies, and the focus on local heritage. In general, we are pleased to note that many comments we made at Regulation 14 stage have been taken into account, but we have the following additional comments to make at this point:

We advised at Regulation 14 stage that paragraph 8.4 need not make reference to the Babergh District Council in the context of 'registering' of Local Heritage Assets, because the identification and inclusion of such in the neighbourhood plan would, once it is Made, mean this was unnecessary. We would recommend removing the last part of this paragraph, under the list of buildings identified.

LWD 12: The policy wording of Policy LWD 12 should be modified to avoid using the phrase 'Substantial Harm'. Substantial harm, in terms of the NPPF, is a specific phrase that refers to a specific policy test that is only engaged where there is harm to designated heritage assets. Although it might be arguable that the high level of harm it refers to (which has been established in case law, and set out in the Planning Practice Guidance) could be caused to a non-designated heritage asset, the use of the phrase is confusing and unnecessary because it refers to the specific test paragraph 195 of the NPPF that would not be engaged in this situation.

In addition, the wording of the policy suggests that any level of harm below total loss or demolition would not require a supporting heritage statement. We consider that if this policy is kept in the plan, then it should be reworded to avoid this confusion. We provide a suggested re-phrasing below:



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Proposals for any works that would cause harm to the significance building of local significance should be supported by an appropriate analysis of the significance of the asset to enable a balanced judgement to be made having regard to the scale of any harm or loss and the significance of the heritage asset.

LWD 13: with reference to the above, we also note that the last paragraph of Policy LWD 13 includes the same requirement for a justificatory statement, applied to all heritage assets, and therefore suggest that Policy LWD 12 is altered to be an 'identification' policy only, which sets out which buildings are heritage assets. Policy LWD13 should then provide the wording requiring a heritage assessment covering all heritage assets as appropriate.

LWD 14: we welcome the policy protecting Holbrook Park, but note that there should be a reference to evidence for the inclusion for this area. We have reviewed the Character Assessment Document from 2018, which includes reference to the Holbrook Hall Park, so this document should be referred to in support of this policy. We would also insert the word "preserve" before "enhance" in this wording of the policy. We also highlight that the character assessment document recommends that the buildings in Holbrook Hall Park are all worthy of including on the local list. If they are not already on the District Local List, we would recommend that these buildings are included in the provisions of policy LWD12.

We have no further comments to make. We would refer you also to any comments made at Regulation 14 stage, as well for general advice to our detailed guidance 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/>.

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

cc:



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