

## Little Waldingfield Neighbourhood Plan

Parish Council's response to comments received at Regulation 16 Consultation stage

Body	Parish Council response
1) Suffolk County Council	<p><u>Health and Wellbeing</u></p> <p>The Government introduced national technical standards for housing in 2015. A Written Ministerial Statement (2015) explains that neighbourhood plans should not set out any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. We believe that the requirement for new dwellings to be built to optional M4(2) standards falls into these standards.</p> <p><u>Highways and Transport</u></p> <p>A major concern in the village is the narrowness of the public highways, as noted in the Plan. As such, it is not considered that any additional allowance for on-street parking should be made on the existing highways. The Plan does not make provision for the scale of development that the County Council suggest could provide on-street parking within the development.</p>
2) Natural England	Nothing further to add
3) Anglian Water	<p><u>Policy LWD 1</u></p> <p>The form and content of this Policy was drafted to be consistent with recently examined Plans across Mid Suffolk and Babergh in order to maintain a level of consistency for practitioners using the Plans. We feel that the proposed amendment does not help the local community understand what is allowed within or outside the Settlement Boundary and consider that the Policy, as submitted and incorporated into Made Plans does not require amendment.</p> <p><u>Policy LWD 16</u></p> <p>It is considered that the suggested amendment, with a cross-reference to Policy LWD 17, would not provide clarity in the Plan and is overly prescriptive.</p> <p><u>Policy LWD 17</u></p> <p>The wording of this policy reflects that requested by the County Council, the lead local flood authority, and is consistent with policies in recently examined neighbourhood plans across Babergh and Mid Suffolk. The deletion of the words "as appropriate" would mean that the policy would have to apply to all development, even if it didn't involve drainage.</p> <p>The proposed amendments to Paragraph 9.6 are not appropriate for the same reasons.</p>
4) Highways England	Nothing further to add
5) National Grid	Nothing further to add
6) Suffolk Wildlife Trust	<p>Suffolk Wildlife Trust did not respond to the Regulation 14 consultation despite being consulted.</p> <p><u>Policy LWD 11</u></p> <p>The policy seeks to provide a level of consistency across the District. We are aware that a similarly worded policy is included in examined neighbourhood plans across Babergh and Mid Suffolk, including at Drinkstone and Thorndon. Such changes as those</p>

	<p>suggested by SWT are not considered necessary in order for the policy to meet the Basic Conditions.</p> <p>Reference to a future Environment Act is not appropriate given that circumstances and timescales in Parliament frequently change, particularly in these difficult times.</p>
7) Water Management Alliance	<p>The Water Management Alliance did not respond to the Regulation 14 consultation despite being consulted.</p> <p>Nothing further to add.</p>
8) Mr Sheppard	<p><u>Policy LWD1</u> The policy of allowing affordable housing to be built outside the settlement boundary in exceptional circumstances is in accordance with paragraph 77 of the NPPF.</p> <p><u>Policy LWD 4</u> The policy of allowing affordable housing to be built outside the settlement boundary in exceptional circumstances is in accordance with paragraph 77 of the NPPF.</p> <p><u>Policy LWD 14</u> The policy does not prohibit SRL Technical Services, or any other development proposal, of being permitted where the proposal has regard to the special characteristics of the area.</p> <p><u>Policy LWD15</u> Nothing further to add.</p> <p><u>Paragraph 9</u> Nothing further to add.</p> <p><u>Policy LWD19</u> The typo is noted but it is suggested that, for the sake of consistency with other neighbourhood plans that have been adopted across Babergh and Mid Suffolk, the sentence should read: "Any replacement provision should take account of the needs <del>of the needs</del> of the village and the current standards of open space and sports facility provision adopted by the local planning authority."</p> <p><u>Appendix 3</u> The double counting of this development is noted. It is suggested that the Appendix is amended to delete the reference to DC/17/03214/FUL in the first part of the table and reduce the total in that part to 4. There would also need to be consequential amendments to the text elsewhere in the Plan. It is noted that the October 2020 Strategic Housing and Employment Land Availability Assessment still refers to this permission given the April 2018 base date of the Joint Local Plan.</p>
AF Machinery	<p><u>Policy LWD1</u> The Pre-Submission Joint Local Plan (November 2020) identifies a Settlement Boundary for Little Waldingfield which reflects that contained in the Neighbourhood Plan. The Neighbourhood Plan is therefore consistent with an emerging Local Plan that is at an advanced stage in its preparation. The Settlement Boundary also reflects that in the adopted Local Plan and, given the Hamlet status of the village in the emerging</p>

	<p>Settlement Hierarchy, there is no need to amend the Settlement Boundary to potentially allow further development.</p> <p><u>Section 6 – Housing</u> As noted in our response above, the Neighbourhood Plan is in general conformity with the most recently published Joint Local Plan document, particularly in relation to the Settlement Boundary. Planning application DC/20/04728 does not address the issues identified in the SHELAA as demonstrated by the objections to the application from Suffolk County Council Highways, Historic England, the District Council’s Heritage Officer and the Suffolk Preservation Society.</p> <p><u>Policy LWD2</u> The Preferred Options Joint Local Plan requirement has now been superseded by the content of the Pre-Submission Joint Local Plan (November 2020) which, in Table 04, sets out a minimum requirement for Little Waldingfield of 4 dwellings. This requirement has already been met through planning permissions granted since 1 April 2018 (the base date of the Joint Local Plan). The Neighbourhood Plan (paragraph 6.1) refers to paragraph 65 of the NPPF which states that strategic policies should: “set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.” The Neighbourhood Plan is in conformity with the most recently published Joint Local Plan document and Babergh District Council has not objected to the figure in Policy LWD2.</p> <p>There is no need for the Neighbourhood Plan to refer to the “emerging new proposed methodology for calculating housing need”. Should this methodology be formally introduced by the Government, the figures will apply at local planning authority level and will not specify the requirement at Neighbourhood Area.</p> <p><u>Policy LWD9</u> The area of land in question is not allocated for development in the Pre-Submission Joint Local Plan (November 2020). A separate assessment of whether, in the opinion of the Qualifying Body, sites in the village meet the NPPF Criteria has been published and it is for the Examiner to determine whether the land in question satisfies those criteria.</p>
Historic England	<p><u>Local Heritage Assets comment</u> This is a matter for the Examiner to determine.</p> <p><u>Policy LWD12</u> The wording of the Policy reflects that in other neighbourhood plans across Babergh and Mid Suffolk that have recently been examined. It has been included here for consistency of policy application and the approach has not previously been objected to by Historic England.</p> <p><u>Policy LWD13</u> Our comments on LWD12 also apply here.</p> <p><u>Policy LWD14</u> Inclusion of the references to the Character Assessment and the word “preserve” would be supported but not the inclusion of the buildings in Holbrook Hall Park as non-designated heritage assets.</p>