


Sproughton Neighbourhood Plan

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

Respondent	Parish Council response
1) Councillor Zac Norman	The support is appreciated.
2) Suffolk County Council	<p>Suffolk County Council commented at the Regulation 14 consultation stage.</p> <p><u>Policy SPTN16</u></p> <p>On-street parking resulting from the lack of on-plot provision is causing problems within the parish and is expressed through vehicles parking and obstructing the highway. Given the nature of the roads in the village, parking on the highway due to lack of on-plot provision will lead to the potential obstruction of emergency vehicles and creation of a hazard. Encouraging such an approach “within the site of any new developments” is only going to continue those problems within future developments and result in street designs that are car dominated, as can be witnessed at Vale View Road on the Wolsey Grange development as illustrated in the Google Maps aerial view below where cars are not using the parking bays provided. The suggested amendment by the County Council in this respect would be unlikely to overcome such design issues.</p>  <p>Source: Google Maps</p> <p>The Parish Council would support strengthening the policy to prioritise movements of pedestrians and cyclists as suggested.</p>

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	<p>The Parish Council are happy to amend the Policies Map key to indicate that the grey areas are site with planning consent for housing. In addition, the extent of the Inset Map for Wolsey Grange needs identifying on the main Policies Map.</p>
<p>3) Babergh District Council</p>	<p>Babergh District Council commented at the Regulation 14 consultation stage.</p> <p>Para 6.18: The Parish Council would support this suggested change, which it is believed can be made as a minor amendment following examination without impacting on the overall meaning and intent of the Plan.</p> <p>Maps 3 and 4: It is agreed that the maps should be referenced in the text and an amendment to paragraph 8.3 could usefully address this matter. The title for Map 4 would also need amending to – “Sproughton Neighbourhood Plan Landscape Assessment: Figure 4 Analysis South”</p> <p>Para 8.9: Agree that the reference in this paragraph should be to Map 5.</p> <p>Policy SPTN 9: It is not believed that the map reference requires amending as Maps 3 and 4 should be retained in the Plan.</p> <p>Policy SPTN10: Noted</p> <p>Para 10.6: This typo can be picked up in the Referendum version of the Plan.</p> <p>Policy SPTN 20: The Parish Council would support this amendment should the Examiner consider it necessary.</p> <p>Policies Map: The key can be amended in the Referendum version of the Plan.</p>
<p>4) Natural England</p>	<p>Natural England commented at the Regulation 14 consultation stage.</p> <p>Nothing further to add.</p>
<p>5) Historic England</p>	<p>Historic England were consulted but did not comment at the Regulation 14 consultation stage.</p> <p>Para 9.3: The Parish Council would support the suggested deletion in this paragraph.</p>
<p>6) Anglian Water</p>	<p>Anglian Water did not comment at the Regulation 14 consultation stage.</p> <p>Policy SPTN 7: Nothing further to add</p> <p>Policy SPTN 10: Nothing further to add</p> <p>Policy SPTN 11: Nothing further to add</p> <p>Policy SPTN 16: The extent to which neighbourhood plans can specify standards in energy and water efficiency in new homes is restricted by the Written Ministerial Statement made by the Rt Hon Eric Pickles in 2015 (UK Parliament Ref HCWS488).</p>

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	<p>Policy SPTN 17: It is not considered necessary to refer to the Sproughton Design Codes in the policy.</p>
<p>7) East Suffolk Internal Drainage Board</p>	<p>East Suffolk Internal Drainage Board did not comment at the Regulation 14 consultation stage.</p> <p><u>Policy WTD 13</u> It is not considered that the Policy requires amending to include reference to the relevant regulators. Such a requirement will be part of the development management process when planning applications are considered and will depend upon which bodies are in place at the time.</p>
<p>8) Marine Management Organisation</p>	<p>The Organisation did not comment at Regulation 14 consultation stage.</p> <p>Nothing further to add.</p>
<p>9) Defence Infrastructure Organisation</p>	<p>The Defence Infrastructure Organisation did not comment at the Regulation 14 consultation stage.</p> <p>Nothing further to add.</p>
<p>10) Mr Livall</p>	<p>Mr Livall did not comment at the Regulation 14 consultation stage.</p> <p>Objection 1: The Parish Council is not required to provide up-to-date biodiversity information as part of its Neighbourhood Plan</p> <p>Objection 2: It is not necessary for the Neighbourhood Plan to address the challenge of climate change. There is no prescription as to what neighbourhood plans should or should not cover. Further, the Written Ministerial Statement made by the Rt Hon Eric Pickles in 2015 (UK Parliament Ref HCWS488) specifically limits the ability of neighbourhood plans to set local standards in relation to energy efficiency and climate change.</p> <p>Objection 3: The Parish Council considers that Policy SPTN 11 is appropriately written and meets the Basic Conditions.</p> <p>Objection 4: The Submission Neighbourhood Plan is that which the Examiner has before her rather than the Pre-Submission Plan. The Parish Council considers that the site at Landbridge, Rivers Court does not meet the NMPPF criteria.</p>
<p>11) Boyer Planning on behalf of Taylor Wimpey</p>	<p>Boyer Planning on behalf of Taylor Wimpey commented at the Regulation 14 consultation stage</p> <p>In respect of planning application DC/21/02671, it is agreed that Babergh District Council resolved to approve the outline planning application subject to a Section 106 planning obligation being signed. The District Council have yet to issue that decision and therefore the site does not yet benefit from outline planning permission.</p> <p><u>Settlement Boundaries and Boyer comment 2.8:</u></p>

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	<p>The comments concerning the changes to the Settlement Boundaries between the Pre-Submission Plan and the Submission Plan are noted. The Settlement Boundaries in the Pre-Submission Plan reflected the situation at that time, when the examination into the Joint Local Plan was underway and there was a reasonable expectation that the Joint Local Plan would be adopted before the Neighbourhood Plan was examined. Circumstances are now very different, as the Submission Neighbourhood Plan notes, and it is clear that the Local Plan Inspectors do not support the Settlement Boundaries as illustrated in the submitted Joint Local Plan (November 2020). In particular, one site identified for housing in the Joint Local Plan north of Burstall Lane has since been refused planning consent which warrants the deletion of any indication of development on that site in the Neighbourhood Plan and, at the time the Neighbourhood Plan was submitted and when this response is being prepared, there is no planning consent on Taylor Wimpey's site on land north of the A1071. Such amendments are not deemed as major changes as they did not impact on land allocations given that the Pre-Submission Plan did not allocate these sites. Babergh District Council has indicated that they are satisfied that the Neighbourhood Plan satisfies the Basic Conditions and did not require the Parish Council to undertake a further pre-submission consultation as Boyer Planning suggest.</p> <p><u>Statement para 2.10:</u> The Parish Council has fulfilled its requirements in relation to consultation and was not required to consult further with Taylor Wimpey prior to submitting the Plan.</p> <p><u>Statement para 2.13:</u> We understand that the Tiptree NP failed at examination primarily because it made provision for development outside the Neighbourhood Area. The Sproughton NP does not do this.</p> <p><u>Statement para 2.17:</u> It is clear that the Shobdon NP was allocating sites for development and that these changed at submission stage. This is not the case at Sproughton as no sites for housing have been allocated in the Plan.</p> <p><u>Policy SPTN1:</u> The "fundamental issue" referred to in para 2.25 of the Boyer Planning statement is irrelevant in consideration of Policy SPTN1 given that it states "The Neighbourhood Plan area will accommodate development commensurate with Sproughton's position in the district's Settlement Hierarchy." The adopted Local Plan is the Core Strategy for Babergh dated 2014 which identifies Sproughton as a Hinterland Village. Policy SPTN1 is in accordance with the adopted Core Strategy and whatever the Joint Local Plan ends up defining the parish in the settlement hierarchy, the submitted Neighbourhood Plan policy will remain compliant. The</p> <p><u>Para 2.26:</u> The Neighbourhood Plan does not need to allocate sites for housing given the current status of the Joint Local Plan and the fact that the Local Plan Inspectors have proposed the deletion of new allocations from what would be a new Part 1 Local Plan document.</p> <p><u>Para 2.27:</u> The Neighbourhood Plan has been prepared to be in accordance with the strategic policies of the adopted Local Plan. It does not need to promote growth at a time when</p>

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	<p>the Local Plan Inspectors have raised serious concerns as to the distribution of growth in the Joint Local Plan.</p> <p><u>Policy SPTN2:</u> The policy specifically states that the mix of housing could be different “if it can be demonstrated that....ii. the latest publicly available housing needs information for the Plan area identifies a need for a different mix .” The flexibility which Boyer Planning seek is therefore already incorporated into the Policy.</p> <p><u>Para 2.33:</u> It is agreed that there could be some confusion in this instance and that the second criteria could be amended to a) and b).</p> <p><u>Policy SPTN7:</u> The Parish Council considers that the policy and supporting evidence is entirely consistent with the Basic Conditions in that the Landscape Appraisal, in particular, has taken its direction from the higher level Settlement Sensitivity Assessment prepared by the same Landscaped Architect in support of the Joint Local Plan see https://www.babergh.gov.uk/assets/Strategic-Planning/JLPExamination/CoreDocLibrary/E-EvidenceBase/EnvandHeritage-EE/EE07-Ipswich-Fringe-Settlement-Sensitivity-Assessment-July2018.pdf</p> <p>Paragraph 5.1.3 of the Neighbourhood Plan Landscaped Appraisal specifically states “the previous Settlement Sensitivity Assessment has been reviewed and built upon.”</p> <p>The submitted supporting document, “Land at Red House, Chantry Vale, Sproughton: Landscape Appraisal” (Alison Farmer Associates, September 2019) identifies the area indicated on the Neighbourhood Plan Policies Map as a “Valued Landscape”. Paragraph 6.6 of the Appraisal states: The analysis indicates that Chantry Vale is likely to constitute a valued landscape.”</p> <p><u>Policy SPTN8:</u> It is clear that there are gaps in the built-up areas of the village and that, in defining a settlement gap, the policy would not just relate to the road frontage and allow development at the rear of this frontage that would breach this gap.</p> <p><u>Policy SPTN9:</u> The accompanying includes a detailed assessment of important views prepared by a professional landscape architect.</p> <p>Para 2.48: Paragraph 8.15 provides a specific reference to the Haven Gateway Green Infrastructure Strategy and the Plan contains a hyperlink to this strategy.</p> <p><u>Policy SPTN10:</u> Nothing further to add</p> <p><u>Policy SPTN13:</u> It is noted that the appendix in the submission, prepared by RPS, is focused specifically at the site which is the subject of the outline planning application referred to above. As such, the Parish Council has nothing further to add as it does not appear to register an objection to Policy SPTN13.</p>

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	<p><u>Policy SPTN21:</u> It is not considered site allocations are necessary for the implementation of this policy. The Plan does not specifically identify proposals for new public rights of way and therefore it does satisfy the Basic Conditions referred to by Boyer Planning.</p> <p><u>Policies Map:</u> Nothing further to add</p>
Pigeon Investment Management	<p>Pigeon Investment Management commented at the Regulation 14 consultation stage</p> <p><u>Planning Policy Context</u> The Neighbourhood Plan Settlement Boundaries are proportionate to the status of Sproughton’s designation as a Hinterland Village in the adopted Core Strategy and the current circumstances in relation to the preparation of the Joint Local Plan.</p> <p><u>Vision and Objectives</u> The Neighbourhood Plan Vision and Objectives are appropriate to the strategic planning policies of the adopted Local Plan. Affordable housing is being provided in Wolsey Grange 1 by Taylor Wimpey Ltd and the Plan allows for the development of affordable housing to meet locally identified needs as a rural exception site and in accordance with the NPPF.</p> <p><u>Policy SPTN1</u> The Parish Council considers that paragraph 5.3 is appropriate and reflects the intent of the NPPF.</p> <p><u>Policy SPTN2</u> The policy specifically states that the mix of housing could be different “if it can be demonstrated that....ii. the latest publicly available housing needs information for the Plan area identifies a need for a different mix .” The flexibility which Boyer Planning seek is therefore already incorporated into the Policy.</p> <p><u>Paragraph 8.9</u> The Parish Council disagrees that evidence if not available to support the Important Gaps designation. It also disagrees that “development within the majority of the ‘settlement gaps’ as shown on Map 6 would not result in coalescence of Sproughton with neighbouring settlements.” It would potentially lead to the erosion of the gap and the consequential coalescence of settlement.</p> <p><u>Policy SPTN9</u> It is considered that the evidence to support the designation of the important views, as set out in the Landscape Appraisal, is sufficiently robust and useful to assist in any required LVIA.</p> <p><u>Policy SPTN12</u> The 50 homes threshold is a requirement of Natural England across the whole of the area covered by the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy.</p> <p><u>Policy SPTN13</u> The Parish Council considers that the language used is consistent with the NPPF.</p>

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	<p><u>Policy SPTN16:</u> The Parish Council considers that the policy is consistent with the NPPF.</p>