

Babergh District Council



Whatfield Neighbourhood Development Plan

Submission Consultation Responses

On the 3 December 2020, Whatfield 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).

By mutual consent, the consultation period ran from Monday 18 January 2021 until Friday 5 March 2021.

Seventeen organisations / individuals submitted written representations on the Plan. They are listed below and copies of their representation are attached.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Babergh District Council
(3)	Suffolk County Councillor Mick Fraser
(4)	Natural England
(5)	Historic England
(6)	Anglian Water
(7)	Highways England
(8)	National Grid (via Avison Young)
(9)	Suffolk Wildlife Trust
(10)	The Water Management Alliance
(11)	Lawson PP (obo M Chisnall & Sons Ltd)
(12)	Resident: Ashford
(13)	Resident: Hartwell
(14)	Resident: McKenzie
(15)	Resident: Tweedy
(16)	Resident: Walker_1
(17)	Resident: Walker_2

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(1) SUFFOLK COUNTY COUNCIL

Date: 1 March 2021
Enquiries to: Georgia Teague
Tel: [REDACTED]
Email: [REDACTED]



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

Dear Mr Hobbs,

Submission Consultation version of the Whatfield Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Whatfield 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.

SCC would like to thank the Parish Council for their amendments to the plan following the Reg14 consultation, however, would like to raise the following issues, where we believe there has been slight misinterpretations of our comments, due to formatting issues.

As the Parish Council state that they agree with the proposed amendments, we believe this is some minor misunderstandings, with text to be removed indicated through ~~strikethrough~~ not copying correctly into the consolidated responses table.

Whilst these proposed amendments are not issues regarding the Basic Conditions, we believe the following suggestions will provide greater clarity for the plan.

Natural Environment

Policy WHAT1, Natural Features section:

The following more strongly worded amendment is recommended to the Natural features section of Policy WHAT1:

“Development proposals will be expected to retain existing features of landscape and biodiversity value, where possible to do so (including ponds, trees, woodland, hedgerows and verges) ~~and where practical to do so~~, providing a net gain in biodiversity through, for example:”

Transport

Policy WHAT4:

It is suggested that part b) of Policy WHAT4 New Housing is reworded slightly, to be in line with paragraph 109 of the NPPF:

“b) development would not have an ~~adverse~~ unacceptable impact upon the historic or natural environment or highway safety”

Policy WHAT6 part h:

The following wording is recommended to be included in Policy WHAT6 The Whatfield Design Guide:

“Provision for Garages ~~and off street~~ parking, in line with Suffolk Guidance for Parking (2019), including a proportion of well-designed and integrated on-street parking provisions which avoids obstructions within any new developments.”

SCC has no further comments to make at this stage, and requests to be kept informed and updated as this plan progresses.

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

(2) BABERGH DISTRICT COUNCIL

Our Ref: Whatfield NP R16

Dated: 5 March 2021

To: Ann Skippers (Independent Examiner)
cc: Whatfield Parish Council

Dear Ann,

1. **Whatfield Neighbourhood Plan: Regulation 16 Submission Draft consultation**
2. **Additional comments from Babergh District Council**

Sent for and on behalf of Robert Hobbs (Corporate Manager – Strategic Planning)

Following formal submission of the Whatfield Neighbourhood Plan ('the NP'), the District Council broadly welcomes that changes that have been made in response to our comments on the Regulation 14 Pre-submission draft version of this Plan. This said, we consider it appropriate to bring your attention to a few matters, all of which can easily be addressed.

Settlement Boundary:

Paragraph 3.6 states that the NP "adopts the settlement boundary as defined in the BMSJLP¹ November 2020 (shown in pink on the maps) for the purposes of its policies." The relevant maps are: Map D (page 38), Map E (page 42) and the Policies Map Inner at Appendix F (page 90).

We note that all three maps still show the settlement boundary from our July 2019 Preferred Options BMSJLP, and not the revised boundary in our November 2020 document. The differences are small but they do now place some parts the village (e.g. the church/churchyard, allotments and the playing field area), adjacent too but outside the settlement boundary.

If the Parish Council can confirm their acceptance of our November 2020 BMSJLP boundary, we can provide them with a suitable base map to make the changes.

Local Green Spaces (supporting text and associated maps):

Paragraph 6.19 of the NP refers to the July 2019 Preferred Options JLP as only including one area of green space for protection: the playing field/children's play area adjacent to the school. While true, our November 2020 Pre-submission draft JLP identifies two areas at the south-west end of the village as Designated Open Space. One is the aforementioned play area and the other is the allotments off Semer Road. It would be sensible to update paragraph 6.19 to acknowledge that the JLP now identifies the two open spaces.

Cont./

¹ Babergh & Mid Suffolk Joint Local Plan [JLP]



You may also observe that differences exist between the JLP allocations and those set out in the NP. Our designations were based on information that fed into the publication in May 2019 of the Babergh & Mid Suffolk Open Space Study². We also recognise that local knowledge is key and. For example, the NP identifies a smaller allotment area (e.g. Map E on page 42) which may be because the northern part of the allotment site is no longer in use?

Policy WHAT3: Local Green Spaces.

In our Regulation 14 response we suggested that the Parish Council include a reference to development on Local Green Spaces (LGS) only being permitted in very special circumstances. This advice was based on examples of similar policies in other NPs, and resulted in the inclusion of the penultimate paragraph in policy WHAT3.

Now mindful of advice that we have seen filtered down through other recently examined neighbourhood plans, and guided by you, it is appropriate that we should now advise the parish Council that our earlier instruction should no longer be treated as sound and that they should expect your Final Report to include a modification to the wording of this policy which will ensure that it remains consistent with national planning policy relating to the management of development in LGSs.

* * * * *

Having met the NP Group in the early stages and having subsequently had regular contact with them through their appointed Consultant, we are aware of the time and energy invested in this Plan. It seeks to secure the long term future of those things that the local community hold most dear while providing sufficient flexibility and guidance to enable appropriate new development to continue to come forwards.

We trust that our comments above will be welcomed and will be happy to answer any questions you may have on these or on other matters identified for clarification through the examination process.

Yours sincerely,

Paul Bryant
Neighbourhood Planning Officer
Babergh & Mid Suffolk District Councils – Working Together

T: 01449 724771 / 07860 829547

E: communityplanning@baberghmidsuffolk.gov.uk

² <https://www.babergh.gov.uk/planning/planning-policy/evidence-base/current-evidence/open-space-assessment/>

(3) SUFFOLK CC - CLLR MICK FRASER

E from: Councillor Mick Fraser

Rec'd: 16 January 2021

Subject: RE: Consultation: Reg 16 Whatfield N'hood Plan (Babergh)

Dear Paul,

Thank you for sending me this consultation.

I have no comments to make on it.

Best regards

CLlr Mick Fraser
Councillor for Hadleigh Division
Suffolk County Council

[Ends]

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(4) NATURAL ENGLAND

Date: 5 February 2021
Our ref: 340144/15482



Babergh & Mid Suffolk District Councils

BY EMAIL ONLY

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

T 0300 060 3900

Dear Sir/Madam

Whatfield Neighbourhood Plan – Reg 16 consultation

Thank you for your consultation on the above dated 14 January 2021.

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 specific comments on this Regulation 16 of the Whatfield Neighbourhood Plan.

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

Yours faithfully
Dawn Kinrade
Consultations Team

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(5) HISTORIC ENGLAND



Historic England

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

Direct Dial: [REDACTED]

Our ref: PL00463262

3 March 2021

Dear Mr Bryant

Ref: Whatfield Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We welcome the production of this neighbourhood plan, and are particularly pleased to note the inclusion of policies aimed at protecting Whatfield's landscape setting, as well as the inclusion of a detailed design guide for new development, which we consider will be useful at ensuring future buildings complement the village's existing character. We do not consider it necessary for Historic England to provide detailed comments on the plan at this stage, however.

We would refer you to any previous comments submitted at Regulation 14 stage if appropriate, and for any further information to our detailed advice 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/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. 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 NP, 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



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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(6) ANGLIAN WATER

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.	WHAT6
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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 residential development incorporating Sustainable Drainage Systems (SuDS).

Anglian Water fully supports the incorporation of SuDs to addresses the risk of surface water and sewer flooding and which have wider benefits including water quality.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(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 (the Examiners Report)	X
The final 'making' (adoption) of the Whatfield NDP by Babergh District Council	X

Signed: S Patience

Dated: 27th January 2021

(7) HIGHWAYS ENGLAND

E from: Planning EE <PlanningEE@highwaysengland.co.uk>
Rec'd: 15 January 2021
Subject: RE: Consultation: Reg 16 Whatfield N'hood Plan (Babergh)

Dear Sir/Madam

We have reviewed the details and information provided. Due to the area and location that is covered by this Neighbourhood Plan being quite remote from the Strategic Road Network (SRN), any traffic generation from any future development would be diluted before reaching the SRN, therefore there would be no predicted adverse effect upon the Strategic Road Network.

Consequently, we offer **No Comment**.

Kind Regards

Jarrold Goy, Senior Administrator

Spatial Planning | Operations (east) Highways England

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

Email; planningEE@highwaysengland.co.uk

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

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Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

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

avisonyoung.co.uk

Our Ref: MV/ 15B901605



03 March 2021

Babergh Mid Suffolk District Council
communityplanning@baberghmidsuffolk.gov.uk

Via email only

Dear Sir / Madam

**Whatfield Neighbourhood Plan Regulation 16 Consultation
January – March 2021
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:

Avison Young (UK) Limited registered in England and Wales number 6382509.
Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS



- 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>

(9) 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.	6.9 – 6.12	Policy No.	WHAT 1
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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 Whatfield 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.

What improvements or modifications would you suggest?

We are pleased to see that the Neighbourhood Plan acknowledges that Claves Wood County Wildlife Site (CWS), Whatfield Meadow CWS (also referred to as Buckle's Meadow) and Hill Farm Meadow CWS are located within the Parish, we believe they should be included within Policy WHAT 1. County Wildlife Sites are non-statutory designation sites recognised within the National Planning Policy Framework as 'Locally Designated Sites'. Whilst we are pleased that the Neighbourhood Plan wishes to protect non designated sites of wildlife value, we believe that the CWSs should also be referenced within the policy, so they are protected within the Neighbourhood Plan from future developments.

The policy states that development proposals will 'where practical to do so, provide a net gain in biodiversity'. As the National Planning Policy Framework (NPPF, 2019) Chapter 15 States, planning policy should minimise impacts and provide net gains for biodiversity. Therefore, all development should seek this, not just 'where it is practical to do so'.

All future development proposals should apply the mitigation hierarchy to 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 WHAT 1 to ensure that future development will not have a negative effect on the area's biodiversity and will deliver a biodiversity net gain.

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 (the Examiners Report)	✓
The final 'making' (adoption) of the Whatfield NDP by Babergh District Council	✓

Signed: Jacob Devenney

Dated: 3rd March 2021

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(10) WATER MANAGEMENT ALLIANCE

E from: Eleanor Roberts
Rec'd: 15 January 2021
Subject: RE: CONSULTATION: Reg 16 Whatfield N'hood Plan (Babergh)

Good Morning,

Thank you for the below consultation.

The parish lies outside the East Suffolk IDB watershed catchment, therefore we have no comments.

Kind regards,

Eleanor Roberts

Sustainable Development Officer

e: planning@wlma.org.uk

Water Management Alliance

Kettlewell House, Austin Fields Industrial Estate, King's Lynn, Norfolk, PE30 1PH, 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 [Pevensey and Cuckmere Water Level Management Board](#), [Upper Medway IDB](#) and [Lower Medway IDB](#).

Defenders of the Lowland Environment



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* * * * *

From: BMSDC Community Planning <communityplanning@baberghmidsuffolk.gov.uk>

Sent: 14 January 2021 14:18

To: BMSDC Community Planning <communityplanning@baberghmidsuffolk.gov.uk>

Subject: CONSULTATION: Reg 16 Whatfield N'hood Plan (Babergh)

[.....]

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(11) LAWSON PP LTD – obo M Chisnall & Sons

E from: Sandra Green (Senior Planner, Lawson PP Ltd)
cc James Lawson
Dated: 5 March 2021
Subject: Whatfield NP Reg 16 Consultation – Representation on behalf of M Chisnall & Sons
Attach: (see below)

Good Morning Paul/ Spatial Planning Team,

We write on behalf of M Chisnall & Sons who control Vacant Land North of The Street in Whatfield, which is suitable and available for housing, and **OBJECT** to the submission draft, as set out in the **attached** consultation response forms, along with the letter based submission & accompanying documentation, as follows:

- **Para. 3.6 & Appendix F Map** Consultation Response Form;
- **WHAT4** Consultation Response Form;
- LPP letter-based representations dated 5/3/21;
- LPP letter-based representations dated 23.12.20 to the Regulation 19 version of the Babergh & Mid Suffolk Joint Local Plan (JLP) in December 2020;

Please acknowledge receipt of these representations.

Regards,

Sandra Green Bsc (Hons), PGDip (Merit), MRTPI

Senior Planner

Lawson Planning Partnership Ltd

882 The Crescent, Colchester Business Park, Colchester, CO4 9YQ

Tel: 01206 835150

Email: sandragreen@lppartnership.co.uk

Web: www.lppartnership.co.uk



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Consultation Response Form

Whatfield Neighbourhood Development Plan 2018 - 2037

The Neighbourhood Planning (General) Regulations 2012 Regulation 16 (as amended)

Whatfield Parish Council have prepared and submitted a Neighbourhood Development Plan which sets out a vision for the parish and policies which it intends will be used to help determine planning applications within the designated area.

The submission draft Whatfield Neighbourhood Plan and supporting documents can be viewed on the District Council website at: www.babergh.gov.uk/WhatfieldNP

We regret that, due to the limitations imposed on us all by the current Covid-19 pandemic we are unable to make hard copies of the Plan available for viewing at either the Council Office or at other locations in Whatfield. If there is a specific reason that prevents you from accessing these documents online then please call us on tel: 0300 123 4000 (Option 5, then Option 4) during normal office hours to explore ways in which we can help you.

HOW TO SUBMIT YOUR COMMENTS

All comments must be submitted in writing and be received by no later than 4:00pm on Friday 5 March 2021

- Please complete Section One in full so your representation(s) can be taken into account at the Examination stage.
- Please complete Section Two, identifying which paragraph or policy your comments relate too. You may comment on more than one paragraph or policy but please make this clear using appropriate cross references. If necessary, please use separate forms.
- E-mail your completed response form(s) to: communityplanning@baberghmidsuffolk.gov.uk or
- Post your completed response form(s) to: 'Whatfield NP Consultation', c/o Mr Paul Bryant, Spatial Planning Policy Team, Babergh & Mid Suffolk District Council, Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

It will not be possible to accept late representations

All comments received will be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may seek clarity on certain matters.

All information collected and processed by the District Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended). Please note: All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information provided will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our website or call customer services on (0300) 123 4000 and ask to speak to the Information Governance Officer.

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 Steve Chisnall
Job Title (if applicable):	Director
Organisation / Company (if applicable):	M Chisnall & Sons Ltd
Address:	Unit 1 Hadleigh Enterprise Park Crockatt Road Hadleigh Ipswich Suffolk
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	James Lawson, Director Lawson Planning Partnership Ltd
Address:	882 The Crescent Colchester Business Park Colchester
Postcode:	CO4 9YQ
Tel No:	01206 835150
E-mail:	jameslawson@lppartnership.co.uk

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.	3.6 & Appendix F Policies Map Inner	Policy No.	
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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:

The Pre-Submission Version of the BMSJLP November 2020, includes a settlement boundary for Whatfield to define the built up area of the village & countryside beyond. The Whatfield Neighbourhood Plan adopts the settlement boundary as defined in the BMSJLP November 2020 (shown in pink on the maps), for the purposes of its policies.

However, the emerging JLP has not been examined for soundness, and is subject to unresolved objections including:

- ❖ Its reliance on an inappropriate & inconsistent approach to its spatial strategy for the villages - which allocates significant levels of development to both Hinterland & Hamlet Villages which have lower sustainability scores & less infrastructure, services & facilities than Whatfield;
- ❖ Its omission to identify any new growth for Whatfield to meet its local housing needs;
- ❖ The settlement boundary has not been adequately reviewed & remains out of date & illogically drawn – it is not therefore a reliable basis for determining the relationship of development to the built up area or countryside respectively & is flawed in its approach;

Settlement Boundary

Representations previously submitted to both the WNP & JLP consultations provide evidence that the settlement boundary as drawn is illogical, as it does not adhere to the District Council's own Built Up Area Boundary guidelines, insofar as it does not have sufficient regard to established natural features on the ground in determining the extent of the built up area or countryside.

Despite the presence of established boundary features comprising a well treed hedgerow & related ditch system, the majority of the site associated with the vacant Land North of The Street, which relates closely to the built-up part of the village, is omitted from the settlement boundary by a contrived & illogical settlement boundary line. **This issue is expanded on in LPP's accompanying letter-based representations dated 5/3/21 with annex and supporting documents.**

Policy WHAT4 seeks to meet Whatfield's housing needs (including affordable housing) up to 2037 by relying on "windfall development" of up to 5 dwellings within the defined settlement boundary, or through speculative development of up to 5 dwellings outside of, and immediately adjacent to, the settlement boundary subject to certain criteria being met.

As the village settlement boundary is both tightly & inappropriately drawn, there are no realistic opportunities for “windfall development” to come forward over the plan period sufficient to meet local need. Recent refusals for development to the north and south of the village which were considered to relate poorly to the village and harm landscape character, and the inclusion of a significant area of land as an ‘Area of Important Local Landscape Quality’ in the WNP, provides limited, if any, opportunities for sites to come forward for housing over the plan period.

Also see related form-based representation in respect of Policy WHAT4 New Housing

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Amend the defined settlement boundary to include vacant land North of The Street within it - as shown within the proposed revision to the settlement boundary dated 23/12/20 contained with the accompanying document comprising LPP’s representations to the JLP Pre-Submission Regulation 19 Consultation November 2020.

(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 ...

It would be beneficial to have the opportunity to clarify and present the field work and analysis undertaken by LPP in arriving at the settlement boundary findings, and in identifying the marked inconsistencies in the JLP’s approach to distributing growth to the hinterland and hamlet villages, with which this neighbourhood plan seeks to rely on in advance of the objections being appropriately resolved which in all likelihood would lead to modifications to the JLP.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner (the Examiners Report)	✓
The final ‘making’ (adoption) of the Whatfield NDP by Babergh District Council	✓

Signed: James Lawson

Dated: 5/3/21

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Consultation Response Form

Whatfield Neighbourhood Development Plan 2018 - 2037

The Neighbourhood Planning (General) Regulations 2012 Regulation 16 (as amended)

Whatfield Parish Council have prepared and submitted a Neighbourhood Development Plan which sets out a vision for the parish and policies which it intends will be used to help determine planning applications within the designated area.

The submission draft Whatfield Neighbourhood Plan and supporting documents can be viewed on the District Council website at: www.babergh.gov.uk/WhatfieldNP

We regret that, due to the limitations imposed on us all by the current Covid-19 pandemic we are unable to make hard copies of the Plan available for viewing at either the Council Office or at other locations in Whatfield. If there is a specific reason that prevents you from accessing these documents online then please call us on tel: 0300 123 4000 (Option 5, then Option 4) during normal office hours to explore ways in which we can help you.

HOW TO SUBMIT YOUR COMMENTS

All comments must be submitted in writing and be received by no later than 4:00pm on Friday 5 March 2021

- Please complete Section One in full so your representation(s) can be taken into account at the Examination stage.
- Please complete Section Two, identifying which paragraph or policy your comments relate too. You may comment on more than one paragraph or policy but please make this clear using appropriate cross references. If necessary, please use separate forms.
- E-mail your completed response form(s) to: communityplanning@baberghmidsuffolk.gov.uk or
- Post your completed response form(s) to: 'Whatfield NP Consultation', c/o Mr Paul Bryant, Spatial Planning Policy Team, Babergh & Mid Suffolk District Council, Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

It will not be possible to accept late representations

All comments received will be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may seek clarity on certain matters.

All information collected and processed by the District Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended). Please note: All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information provided will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our website or call customer services on (0300) 123 4000 and ask to speak to the Information Governance Officer.

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 Steve Chisnall
Job Title (if applicable):	Director
Organisation / Company (if applicable):	M Chisnall & Sons Ltd
Address:	Unit 1 Hadleigh Enterprise Park Crockatt Road Hadleigh Ipswich Suffolk
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	James Lawson, Director Lawson Planning Partnership Ltd
Address:	882 The Crescent Colchester Business Park Colchester
Postcode:	CO4 9YQ
Tel No:	01206 835150
E-mail:	jameslawson@lppartnership.co.uk

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.	WHAT4
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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:

WNP relies on the Pre-Submission BMSJLP November 2020 to determine Whatfield's housing requirement (minimum 1 dwelling) & related settlement boundary needs to 2037.

However, the emerging JLP has not been examined for soundness, and is subject to unresolved objections including:

- ❖ Its reliance on an inappropriate & inconsistent approach to its spatial strategy for the villages - which allocates significant levels of development to both Hinterland & Hamlet Villages which have lower sustainability scores & less infrastructure, services & facilities than Whatfield;
- ❖ Its omission to identify any new growth for Whatfield to meet its local housing needs – the 1 dwelling is an existing commitment.
- ❖ The settlement boundary has not been adequately reviewed & remains out of date & illogically drawn – it is not therefore a reliable basis for determining the relationship of development to the built-up area or countryside respectively & is flawed in its approach;

Whatfield's Evidenced Housing Needs

Representations previously submitted to both the JLP & WNP consultations identify an evidenced approach for 16-21 homes to meet Whatfield's housing needs over the period to 2037.

The current 'consultative based' approach of the WNP to identify a potential requirement for 8 dwellings to meet the village's housing needs to 2037, has no robust planning basis and has arisen from local opinion based on the questionnaire findings - it is therefore considered to be deficient and flawed as an evidence base.

Policy WHAT4 seeks to meet Whatfield's housing needs (including affordable housing) up to 2037 by relying on "windfall development" of up to 5 dwellings within the defined settlement boundary, or through speculative development of up to 5 dwellings outside of, and immediately adjacent to, the settlement boundary subject to certain criteria being met.

This approach is inconsistent with the adopted local plan, and emerging local plan as by providing an arbitrary limit of 5 dwellings on any prospective housing site, it provides no objective policy basis or delivery mechanism for responding to local housing needs or bringing forward forms of development which could provide affordable housing (triggered by 10

dwellings/ 0.5 ha), or the range of housing formats envisaged as being required in the neighbourhood plan.

This issue is expanded on in LPP's accompanying letter-based representations dated 5/3/21 with annex and supporting documents.

What improvements or modifications would you suggest?

Policy WHAT4: New Housing should be revised & reworded to;

- ❖ Allocate the site at North of The Street for housing comprising up to 15 dwellings;
- ❖ Remove all references to the 5 dwelling limit & omit 'small' in line 2;
- ❖ Include revised criteria within the policy at paragraph a) to provide for housing proposals to be assessed on the basis of meeting a proven local need for affordable & market housing;
- ❖ Retain criterion b) to h) within the policy as currently drafted;
- ❖ Omit criterion g) – covered by a revised criteria a) above;

(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 ...

It would be beneficial to have the opportunity to clarify and present the case for allocating the site at North of The Street for market & affordable housing, including the consultation & infrastructure studies undertaken to provide a Safe Route to the Primary School & traffic management measures which are an integral part of the proposals.

It would also be helpful to outline the marked inconsistencies in the JLP's approach to distributing growth to the hinterland and hamlet villages, with which this neighbourhood plan seeks to rely on in advance of the objections being appropriately resolved which in all likelihood would lead to modifications to the JLP.

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner (the Examiners Report)	✓
The final 'making' (adoption) of the Whatfield NDP by Babergh District Council	✓

Signed: James Lawson	Dated: 5/3/21
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Whatfield Neighbourhood Plan Consultation

C/o Paul Bryant
Spatial Planning Policy Team
Babergh & Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

jameslawson@lpppartnership.co.uk

Tel 01206 835150

Co. Reg. No. 5677777

5th March 2021

Dear Sir,

Consultation on the Submission Draft Whatfield Neighbourhood Plan 2018-2037, (Regulation 16) January 2021 – Representations on behalf of M Chisnall & Sons *

1. We write on behalf of M Chisnall & Sons who control Vacant Land North of The Street in Whatfield, which is suitable and available for housing, and **OBJECT** to the submission draft Whatfield Neighbourhood Plan (WNP) for the following reasons.
2. **The housing and built environment strategy of the WNP is not considered to meet the requirements of Paragraph 8, Schedule 4B of the 1990 Town & Country Planning Act - as it fails to meet 'Basic Conditions' for preparing a Neighbourhood Plan for the following reasons;**
 - ❖ **NATIONAL POLICIES & ADVICE** – the WNP is deficient in its approach as it does not have sufficient regard to national policies & advice contained in the National Planning Policy Framework guidance for plan making;
 - ❖ **SUSTAINABLE DEVELOPMENT** – the housing & built environment strategy would not contribute to the achievement of sustainable development in Whatfield;
 - ❖ **DEVELOPMENT PLAN STRATEGIC POLICIES** – the WNP is not in general conformity with strategic policies in the development plan & places undue reliance on the emerging development plan which is subject to unresolved 'soundness' objections;
 - ❖ **VACANT LAND NORTH OF THE STREET** – is omitted from the housing & built environment strategy for no valid reason & ought to be included as an allocation or via a criteria-based policy;

3. The basis for this objection is amplified further below.

National Policies & Advice – Plan Making: Basic Condition 8, 2 (a) Not Met

4. The National Planning Policy Framework (NPPF) provides advice to planning authorities and neighbourhood planning groups in respect of ‘plan making’, to ensure that local plans and neighbourhood plans are ‘sound’ and meet ‘basic conditions’ respectively - tested through an independent examination.
5. Once ‘Made’ neighbourhood plans form part of the statutory development plan for the area, comprising strategic and non-strategic policies which play a key role in meeting an areas housing and other economic, social and environmental priorities as part of a ‘plan led’ system, including by allocating sites.
6. The NPPF requires plans to be prepared with the objective of contributing to the achievement of sustainable development, and to be prepared positively in a way that is aspirational but deliverable, and able to meet their housing requirements.
7. Neighbourhood plans are expected to shape, direct and help deliver sustainable development, by influencing local planning decisions as part of the statutory development plan.
8. The preparation and review of all policies should be underpinned by relevant and up to date evidence, which should be adequate and proportionate, focused tightly on supporting and justifying the polices concerned, and take into account relevant market signals.
9. The approach of the WNP in general, and housing and built environment strategy in particular, is considered to be deficient as it is not;
 - ❖ Underpinned by relevant & up to date evidence of Whatfield’s local housing needs as a ‘Hinterland Village’ – it adopts a consultative rather than evidenced based approach which is flawed;
 - ❖ Does not meet (or deliver) its housing & infrastructure needs over the period 2018-2037;
 - ❖ Does not have a robust evidence base to justify its housing polices – WHAT 4 (New Housing) & WHAT 5 (Housing Mix);
 - ❖ Does not allocate any sites for housing, include a suitable criteria-based policy, or any mechanisms for delivering sustainable development, including affordable housing, or any other related social or physical infrastructure;

Determining Whatfield's Local Housing Needs

Babergh Districtwide Position

10. Both the adopted and emerging (Regulation 19) local plans acknowledge the requirement for an increased supply of housing of an appropriate mix to meet local needs in the Babergh District due to the following factors;
 - ❖ By 2036 the population in Babergh is expected to grow by approximately 7,300 people, based on the ONS 2016 population projections;
 - ❖ The increasing age of the Babergh population, particularly within the 45-59 and 65+ year old groups;
 - ❖ High levels of housing need & poor affordability with house prices being approximately 11 times above average household incomes in Babergh – the affordability position has worsened since adoption of the Local Plan 2011-31 Core Strategy & Policies DPD in 2014;
 - ❖ A total of 1,986 affordable homes (110 per annum) comprising a mix of 1 – 4 bed shared ownership, affordable/ social rented, discounted home ownership & starter home type tenures are required across the District over the period 2018 – 2036;

Whatfield Local Position

11. The Whatfield Neighbourhood Plan Submission Version (Regulation 16) December 2020, has adopted a 'consultative based approach' to identify the requirement for a mix of new housing to meet local needs over the period to 2036/7.
12. A number of key issues arising from the consultation stages are summarised below;
 - ❖ 64% of respondents considered that 8 – 16 new dwellings would be appropriate & could be sustained in the village over the plan period;
 - ❖ 78% of respondents considered that provision should be made for new affordable dwellings, particularly for key workers;
 - ❖ Detached & semi-detached family housing was supported, which would also help to underpin the primary school, including housing for key workers & bungalows for the elderly;
 - ❖ Either traditional or contemporary designs are considered appropriate;
 - ❖ Measures to address high traffic speeds through the village are a priority;

Evidenced Local Housing Needs

13. The adjoining Neighbourhood Plan Area of Aldham, a hamlet village with a population of 175 residents, adopted an 'evidenced based approach' to identifying the requirement for a mix of new housing to meet its local needs for 15 dwellings over the period to 2036.
14. This approach is consistent with the requirements of Schedule 10, Paragraph 8 of the Localism Act 2011, as amended, insofar as it met the 'basic conditions' tests and was duly 'Made' in January 2020.
15. Using the Aldham approach - based on the village's population as a proportion of the 9% spatial distribution of housing for Hinterland Villages set out in Policy SP04 of the Babergh & Mid Suffolk Joint Local Plan Pre Submission Consultation, November 2020, yields a 'minimum' housing requirement of 21 units for Whatfield.
16. This figure is derived by dividing the 15,650 population of the Babergh Hinterland Villages (less the East Bergholt – East End and Shotley Gate localities where local needs are met within the East Bergholt and Shotley Street Core Villages) by Whatfield's current population of 380 (2019 Suffolk Observatory) which equates to 2.4% x 866 homes = 20.784 (21 homes).
17. The population of the Babergh Hinterland Villages is set out at **Annex 1**.
18. An alternative approach to identifying the village's housing needs based on the forecasted population growth over the period 2018-2036/7, indicates a housing need of 16 homes as follows;
 - ❖ 380 population x 0.6% annual population increase in Babergh (ONS MYE 2011 - 2019) x 18 years = 41: Divided by Whatfield's average household size of 2.5 = 16.41 homes (16);
19. These evidenced based approaches indicate that Whatfield has a local housing need for 16 to 21 homes over the period 2018 – 2036/7.
20. To provide further context to the deficient approach being taken by the WNP as a 'middle ranking' Hinterland Village, the housing provisions of all the Hinterland and Hamlet Villages in Babergh are included for review within a 'Housing Growth Schedule' (Tables 1 & 2) in an **accompanying document** submitted as representations by LPP to the Regulation 19 version of the Babergh & Mid Suffolk Joint Local Plan (JLP) in December 2020.
21. The tables included in the accompanying document demonstrate the inappropriate and inconsistent approach currently being taken by the housing strategy of the JLP, which is the subject of a significant level of 'soundness objection' from both developers and parish councils to be considered at an Examination later this year.

22. The current approach of WNP paragraph 7.17 – 7.20 to set a preferred community threshold of ‘8 dwellings’ based on questionnaire responses, noting that 64% of respondents considered 8-16 dwellings to be appropriate, and seek to justify not allocating a site(s) on non-planning grounds, e.g. due to concerns over ‘community division’ - provides no evidenced planning rationale for the approach.
23. Policy WHAT 4: New Housing which provides criteria for ‘windfall development’ of up to 5 dwellings within or immediately adjacent to the defined settlement boundary, is not therefore underpinned by any planning evidence, and therefore flawed and deficient as an approach to determining the village’s local housing needs.
24. In addition, the village settlement boundary has not been objectively reviewed since 1995 and remains tightly drawn, with no realistic opportunities for ‘windfall development’ to come forward within it over the plan period. A copy of the adopted Built Up Area boundary for Whatfield is included at **Annex 2**.
25. Similarly, there are no sites being promoted for housing development immediately adjacent to the settlement boundary which would meet the suggested criteria in Policy WHAT 4.
26. Two sites which previously proposed housing adjacent to the settlement boundary (south east of Wheatfields & south of Naughton Road) have been refused planning permission by Babergh DC in 2019, with the Wheatfields Site being dismissed on appeal in 2020, as the sites were not considered to be well related to the village and harmed landscape character.
27. The inclusion of a significant area of land as an ‘Area of Important Local Landscape Quality’ in the DWNDP, further limits the opportunities for sites to come forward for housing over the plan period.
28. That said, whilst the resisting of the sites south east of Wheatfields and south of Naughton Road on landscape impact grounds and due to their poor relationship to the village is understandable, there are no other sites which would meet the Policy WHAT 4 criteria.
29. The site being promoted North of The Street which is suitable for housing, available now and deliverable, would meet criteria b) to g) of Policy WHAT 4, but not meet criteria a) which imposes a subjective size limit of up to 5 dwellings.
30. This demonstrates that the WNP has not sought to plan logically or positively to recognise the requirement for well located ‘deliverable sites’, nor has it sought to accommodate the evidenced based housing needs of the village as outlined above.
31. It is therefore in conflict with NPPF guidance which requires Neighbourhood Plans (in association with adopted/ sound local plans) to identify and meet local housing needs, and other economic, social and environmental priorities, as part of a ‘plan led’ approach.

32. The proposals for the site North of The Street are included at **Annex 3** for information.

Sustainable Development – Basic Condition 8,2 (d) Not Met

33. The housing and built environment strategy is not considered to contribute to the achievement of sustainable development in Whatfield for the following reasons;

- ❖ Insufficient provision is made for new housing to meet the village's local needs, including affordable housing, over the period 2018-2036/7;
- ❖ Insufficient provision is made to sustain the village's local services, facilities & infrastructure needs over the period 2018-2036/7;

34. A demonstration that the WNP has not currently made satisfactory provision to meet the village's local housing needs to 2036/7 is set out above.

35. Concerning the need for new housing, whilst the WNP identifies a requirement for a mixed and inclusive community to reflect the aspirations of the local population (incorporating family housing, homes for first time buyers, housing for older people, affordable housing and housing for key workers) it omits to include any suitable policies or mechanisms to deliver these needs.

36. By constraining the housing land market to sites limited to a maximum of 5 dwellings (Policy WHAT 4) there would be no opportunity for affordable housing to be provided - as the NPPF requires planning authorities to only seek affordable housing in connection with 'major development' comprising sites of 10 dwellings or more or 0.5 ha or more.

37. This requirement is reflected in Policy SP02 of the JLP, which stipulates a requirement for 35% affordable housing provision on sites of 10 or more dwellings, or on sites of 0.5 ha or more.

38. In order to be 'policy compliant' with the WNP, any sites of 0.5 ha or more would be limited to a maximum of 5 dwellings providing a very low site density of 10 dwellings/ ha, which would conflict with NPPF guidance for making effective use of land, including under – utilised land (Paragraphs 117-118).

39. This eventuality is however unlikely, as JLP Policy SP02 would require such sites to provide 3 market units and 1.75 (2) affordable units (35%) which would prejudice a developers ability to fund the physical and social infrastructure necessary to deliver the site.

40. The more likely scenario, is that the land market would respond by providing sites of <0.5ha to deliver 5 market units, to ensure that the necessary physical and social infrastructure could be adequately funded.

41. In addition, to adequately fund the physical and social infrastructure required to deliver a 5-unit development, and in responding to market demand, the likelihood is that a developer would opt to bring forward an increased proportion of larger (4 bedroomed) homes, with no provision for first time buyer or key worker housing.
42. The WNP housing and built environment strategy is also unlikely to provide sufficient housing growth to 2036/7 to sustain the village's important village facilities and social infrastructure, including the primary school and village hall (which operates a public bar on Friday evenings), or meet its physical infrastructure requirements - such as the need for a 'safe route to school' and 'speed indicator' devices to reduce traffic speeds through the village.
43. With a preferred upper threshold of 8 dwellings e.g. which Policy WHAT 4 requires to be provided across at least 2 sites, at an annualised rate of 2.25 dwellings, no appreciable contribution would be made to sustain the village's social infrastructure or provide new social or physical infrastructure (via CIL funds or otherwise) across the Plan Period to 2036/7, a fact acknowledged by the WNP itself.
44. This demonstrates that the WNP would not contribute to the achievement of sustainable development, contrary to the NPPF's social objectives which requires the planning system, through the preparation and implementation of plans - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of the present and future generations, and by otherwise supporting communities' health, social and cultural well-being.

Development Plan Strategic Policies – Basic Condition 8,2 (e) Not Met

45. The WNP is not considered to be in conformity with the following adopted Local Plan 2011-2031 Core Strategy & Policies, 2014, strategic policies;
 - ❖ Policy CS2 – as the current approach does not allocate any sites or otherwise accommodate sufficient development to meet its local housing needs, assessed against Policy CS11;
 - ❖ Policy CS11 – as Policy WHAT 4 sets a subjective upper limit of 5 dwellings which would not enable evidenced housing need to be sufficiently met;
 - ❖ Policy CS18 – as Policy WHAT 4 & WHAT 5 do not provide a suitable policy basis to enable the village's local housing needs for starter homes, affordable housing, key worker housing & elderly persons housing to be met;
46. The WNP places undue reliance on draft JLP policies which are subject to unresolved 'soundness objections', particularly Table 4 (minimum housing requirement for neighbourhood

plan areas) and in the event that the following policies are to be found sound, is not considered to be in conformity with the following JLP strategic policies;

- ❖ Policy SP01 – as the current approach is unlikely to provide for a suitable mix, type and size of new housing development, as outlined above;
- ❖ Policy SP02 – as the current approach is unlikely to make any contribution towards the need for affordable housing as outlined above;
- ❖ Policy SP03 – as the current approach relies on an out of date Built Up Area Boundary (settlement boundary) which has not been reviewed since 1995, & is not a reliable basis for assessing the merits of planning applications within the Hinterland Village – this shortcoming is considered further in the next section below;
- ❖ Policy SP04 – as the current approach is unlikely to make a suitable proportional contribution to the housing required in Hinterland Villages, which contain facilities & services requiring to be sustained as outlined above;

Deliverable Housing Site - Vacant Land North of The Street, Whatfield

47. In light of the plan making deficiencies outlined above, there is considered to be a valid basis for including vacant Land North of The Street as a housing allocation, or otherwise providing for its delivery via suitable policy criteria within the WNP.
48. The site is both suitable and available for housing, and is being actively promoted by M Chisnall & Sons (a high-quality local builder) for housing purposes through the JLP and WNP plan making processes. Located in a central position within the village, it is also Whatfield's 'sequentially best' site.
49. A site location plan and related details for the development are included for information at **Annex 3**.
50. Its inclusion within the WNP housing strategy either as a housing allocation, or by revising the Policy WHAT 4 policy criteria to replace the upper limit of 5 dwellings with an evidenced based approach to identifying housing needs, would address the deficiencies outlined above.
51. This would demonstrate that a suitably 'evidenced' plan which meets the village's local housing, services and infrastructure needs, achieving sustainable development, has been prepared satisfying the 'basic conditions' test.

Whatfield's Built Up Area Boundary Not Adequately Reviewed or Reliable

52. The WNP process has not undertaken a review of the Built Up Area Boundary to determine its continuing relevance, or whether reliance can be placed on it to manage future development pressures and consistently implement its housing policies.
53. It is good practice for village settlement boundaries to be regularly reviewed every 5 years, particularly in association with other evidence-based studies underpinning local and neighbourhood plan making processes.
54. Babergh DC adopted Village Planning Policy Guidelines for a number of villages in the District (including Whatfield) in 1995, which defined the built up boundaries of villages for the interpretation of Settlement Planning Policy.
55. The defined Built Up Area Boundaries (BUAB's) were then incorporated into the Second Review of the Local Plan (2006) which included Policy HS02 for managing development within villages, over the plan period to 2016.
56. The Local Plan Core Strategy & Policies (2014) rolling the plan period forward to 2031, continued to incorporate the defined built up boundaries for these villages without undertaking a review.
57. The current 'Built Up Area Boundary' for Whatfield has not therefore been subject to a comprehensive review since 1995, and is clearly out of date.
58. It does not therefore provide a robust basis for assessing the merits of potential housing sites against the criteria set out in WNP Policy WHAT 1 or WHAT 4, as it does not provide a reliable (or relevant) policy tool for determining the defined settlement boundary – in terms of differentiating the built up area from the countryside beyond it.
59. This shortcoming has been recognised by the Secretary of State in his decision on 1st April 2020 to endorse his Inspector's recommendation to 'allow' an appeal for housing in the Core Village of Long Melford (ref APP/D305/WW/18/3214377).
60. In this decision the Inspector drew attention to the village's Built Up Area Boundary as being an unsatisfactory basis for distinguishing acceptable from unacceptable development, when viewed in built up area or countryside character terms.
61. In order for the WNP to place any reliance on a 'criteria based' policy for assessing planning applications for housing development in this way, it is considered necessary for the village settlement boundary to be reviewed, and updated, before the draft Plan proceeds any further.
62. As part of the process of promoting the site and demonstrating its suitability for housing, the village settlement boundary has been reviewed by M Chisnall & Sons. This exercise has been

undertaken in the light of the criteria for identifying logical and defensible features to form the boundary between the built up area and countryside.

63. This approach indicates that the settlement boundary is not robust when assessed against Babergh DC's criteria for determining and updating settlement boundaries.
64. It is evident therefore, that the entire 'proposal site' warrants forming part of the built up area in policy terms, and the current settlement boundary line which arbitrarily traverses the vacant paddock land (placing a significant part of the site in the countryside) has no valid planning basis, and is therefore no longer appropriate.
65. A reasoned justification for extending the settlement boundary further north to align with the strong and defensible natural features on the ground, comprising a well treed, hedgerow and related ditch system separating the site from the wider countryside beyond, is included within the **accompanying document** submitted as representations by LPP to the Regulation 19 version of the Babergh & Mid Suffolk Joint Local Plan (JLP) in December 2020.
66. This document was presented to the Parish Council, incorporating members from the Neighbourhood Plan Group on 22nd January 2020.

Concluding Points

67. We **OBJECT** to the Whatfield Neighbourhood Plan (WNP) as it is not considered to meet the requirements of **Paragraph 8, Schedule 4B of the Town & Country Planning Act 1990**, as it fails to meet '**basic conditions**' for preparing a neighbourhood plan.
68. In particular the current approach is deficient as it does not have sufficient regard to national policies and advice contained in the National Planning Policy Framework (2019) guidance for plan making.
69. The housing and built environment strategy would not contribute to the achievement of sustainable development in Whatfield, as insufficient provision is made for new housing to meet the village's local needs, including affordable housing, and insufficient provision is made to sustain the village's local services, facilities & infrastructure needs over the period 2018-2036/7;
70. In addition, the WNP is not considered to be in general conformity with strategic policies in the adopted local plan, particularly Policies CS2, CS11 and CS18. Furthermore, it places undue reliance on the emerging Joint Local Plan which is subject to unresolved housing policy (soundness) objections, which may lead to an updated housing strategy for the Hinterland Villages in due course.

71. Indeed, at such a time as the housing policies of the JLP may be found to be 'sound', the WNP is not considered to be in general conformity with draft Policies SP01, SP02, SP03 and SP04, as it has no policy basis or delivery mechanism to;
- ❖ Provide for a suitable mix of housing;
 - ❖ Meet local (including affordable) housing needs;
 - ❖ The defined settlement boundary is out of date & constitutes an unreliable policy tool for managing development pressures;
 - ❖ Does not make a suitably proportional contribution towards new housing delivery as a middle ranking Hinterland Village;
72. Furthermore, vacant land located within the centre of the village which is suitable and available for housing, and being actively promoted to meet the village's housing, services and infrastructure needs, is omitted from the housing & built environment strategy for no valid reason.
73. The site therefore ought to be included as an allocation within the Neighbourhood Plan, and/or brought forward via a suitably worded criteria policy.
74. We look forward to the examination process taking these matters into account, and would appreciate your acknowledgment that this submission, along with the accompanying forms and documentation have been safely received.

Yours faithfully

James Lawson
Lawson Planning Partnership Ltd
Encs

Accompanying Documents – these comprise Regulation 16 response forms & Babergh & Mid Suffolk Joint Local Plan 2018-2037 Pre - submission Regulation 19 Consultation Representations on behalf of M Chisnall & Sons dated 23rd December 2020



ANNEX 1

Babergh Hinterland Villages Population

Table 1 - Summary: Ranked by Village Type (Core/Hinterland/Hamlet Villages) + Alphabetical Order including Population

Key:	
Areas with made (adopted) NP	
NP under Reg 14 consultation (as of 01.09.20)	
Draft NP or Area Designated/in progress	
No NP available/not in progress	

Parish	Village Type	Plan Period	Date Neighbourhood Plan Made	Population Estimate (2018 ONS)	Sustainability Score 2020 **	Housing Allocation in Draft/Made Neighbourhood Plan	Local Plan Minimum Housing Requirement for NP Areas - Babergh (Pre-Submission Nov2020) ***
Acton - Newman's Green	Core Village			1853	20		n/a
Bildeston	Core Village			1107	18		n/a
Boxford	Core Village			1332	22		13
Brantham	Core Village			2489	19		n/a
Bures St Mary	Core Village			994	21		n/a
Capel St Mary	Core Village	2018 to 2036		2867	25	300	792
East Bergholt	Core Village	2015 to 2030	20/09/2016	2917	25	86	241
Glensford	Core Village			3666	24		37
Great Cornard	Core Village			9621	31		n/a
Holbrook	Core Village			1900	22	TBC	65
Lavenham	Core Village	2016 to 2031	20/09/2016	1855	25	35	118
Long Melford	Core Village	2019 to 2036		3532	31	TBC	367
Nayland	Core Village			1193	18		n/a
Shotley Street	Core Village			2327	19		n/a
Sproughton*	Core Village			1400	19		1514
Population Sub-Total				39053			
Assington	Hinterland	2018 to 2036		427	12	67	38
Belstead*	Hinterland			201	9		n/a
Bentley	Hinterland	2018 to 2036		517	13	58	52
Burstall	Hinterland			217	11		n/a
Chelmondiston	Hinterland	2020 to 2036		1097	17	None specified	52
Chilton	Hinterland			365	10		161
Cockfield - Howe Lane	Hinterland			861	12		n/a
Copdock & Washbrook*	Hinterland	2018 to 2036		1172	13	274	274
East Bergholt - East End	Hinterland	2015 to 2030	20/09/2016		10	See East Bergholt (Core Village)	See East Bergholt (Core Village)
Elmsett	Hinterland	2017 to 2036	10/12/2019	821	16	60	49
Great Waldingfield	Hinterland			1702	17		39
Hartest	Hinterland	2018-2036		469	9	Not sought to take approach to identify how many homes will be built	12
Hintlesham	Hinterland			793	14		n/a
Hitcham	Hinterland			793	13		17
Kersey	Hinterland			344	13		n/a

Parish	Village Type	Plan Period	Date Neighbourhood Plan Made	Population Estimate (2018 ONS)	Sustainability Score 2020 **	Housing Allocation in Draft/Made Neighbourhood Plan	Local Plan Minimum Housing Requirement for NP Areas - Babergh (Pre-Submission Nov2020) ***
Monks Eleigh	Hinterland			482	10		n/a
Newton	Hinterland	2018 to 2036		497	11	23	23
Polstead - Church	Hinterland			898	10		n/a
Raydon	Hinterland			519	9		n/a
Shotley Gate	Hinterland				9		n/a
Stoke by Nayland	Hinterland			640	17		27
Stratford St Mary	Hinterland			728	17		n/a
Stutton	Hinterland			839	15		65
Tattingstone - Church	Hinterland			540	12		n/a
Whatfield	Hinterland			381	12		1
Wherstead - Bourne Hill*	Hinterland			347	10		n/a
Wherstead Park*	Hinterland				13		n/a
Population Sub-Total				15650			
Acton - Newman's Green	Hamlet				6		n/a
Aldham	Hamlet	2018-2036	21/01/2020	190	7	15	13
Alpheton	Hamlet			268	5		n/a
Alpheton - Bridge Street	Hamlet				3		n/a
Boxford - Calais Street	Hamlet				2		n/a
Boxford - Stone Street	Hamlet				3		n/a
Boxted	Hamlet			...	4		13
Brantham - Stutton Road	Hamlet				7		n/a
Brent Eleigh	Hamlet			164	5		n/a
Brettenham	Hamlet			299	6		n/a
Chattisham	Hamlet			171	3		n/a
Chelmondiston - Ling's Lane	Hamlet	2020 to 2036			1	None specified	n/a
Chelmondiston - Pin Mill	Hamlet	2020 to 2036			4	None specified	n/a
Chelsworth	Hamlet			213	7		n/a
Cockfield - Cross Green	Hamlet				1		n/a
Cockfield - Great Green	Hamlet				6		n/a
Cockfield - Mackenzie Place	Hamlet				5		n/a
Cockfield - Windsor Green	Hamlet				4		n/a
Cornard Tye	Hamlet				8		n/a
Edwardstone - Mill Green	Hamlet			377	4		n/a
Edwardstone - Sherbourne Street	Hamlet				2		n/a
Elmsett - Rookery Road	Hamlet	2017 to 2036	10/12/2019		2	See Elmsett (Hinterland Village)	See Elmsett (Hinterland Village)
Erwarton	Hamlet			...	4		n/a
Freston	Hamlet			137	5		n/a
Great Cornard - Prospect Hill	Hamlet				5		n/a
Great Waldingfield - Church	Hamlet				8		n/a
Great Waldingfield - Upsher Green	Hamlet				7		n/a

Parish	Village Type	Plan Period	Date Neighbourhood Plan Made	Population Estimate (2018 ONS)	Sustainability Score 2020 **	Housing Allocation in Draft/Made Neighbourhood Plan	Local Plan Minimum Housing Requirement for NP Areas - Babergh (Pre-Submission Nov2020) ***
Groton	Hamlet			318	7		n/a
Groton - Castlings Heath	Hamlet				1		n/a
Harkstead	Hamlet			301	6		n/a
Hartest - Cross Green	Hamlet	2018-2036			3	Not sought to take approach to identify how many homes will be built	n/a
Higham	Hamlet			188	2		n/a
Hitcham - Cross Green	Hamlet				2		n/a
Hitcham - The Water Run	Hamlet				2		n/a
Hitcham - The Drive	Hamlet				2		n/a
Holbrook - Lower	Hamlet				4	See Holbrook (Core Village)	See Holbrook (Core Village)
Holton St Mary	Hamlet			232	7		n/a
Kersey - Kersey Tye	Hamlet				2		n/a
Kersey - Wicker Street Green	Hamlet				2		n/a
Kettlebaston	Hamlet			...	4		n/a
Lawshall - Bury Road	Hamlet	2016-2036	24/10/2017	1016	2	20	23
Lawshall - Lambs Lane	Hamlet	2016-2036	24/10/2017		6	See Lawshall Bury Road (Hamlet Village)	See Lawshall Bury Road (Hamlet Village)
Lawshall - Lawshall Green/ Hibbs Green	Hamlet	2016-2036	24/10/2017		2	See Lawshall Bury Road (Hamlet Village)	See Lawshall Bury Road (Hamlet Village)
Lawshall - Street	Hamlet	2016-2036	24/10/2017		8	See Lawshall Bury Road (Hamlet Village)	See Lawshall Bury Road (Hamlet Village)
Layham - Lower	Hamlet			611	4		n/a
Layham - Upper	Hamlet				8		n/a
Leavenheath - Harrow Street	Hamlet			1340	5	40	44
Leavenheath - High Road	Hamlet				7	See Leavenheath - Harrow Street (Hamlet Village)	See Leavenheath - Harrow Street (Hamlet Village)
Leavenheath - Honey Tye	Hamlet				5	See Leavenheath - Harrow Street (Hamlet Village)	See Leavenheath - Harrow Street (Hamlet Village)
Lindsey - Church	Hamlet			207	4		n/a
Lindsey Tye	Hamlet				2		n/a
Little Cornard - Bures Road	Hamlet			288	3		3
Little Cornard - Upper Road	Hamlet				3	See Little Cornard - Bures Road (Hamlet Village)	See Little Cornard - Bures Road (Hamlet Village)
Little Waldingfield	Hamlet	2018 to 2036		359	6	10	4
Milden	Hamlet			115	3		n/a
Monks Eleigh - Swingleton Green	Hamlet				2		n/a
Nedging Tye	Hamlet			...	7		n/a
Polstead - Bower House Tye	Hamlet				7		n/a

Parish	Village Type	Plan Period	Date Neighbourhood Plan Made	Population Estimate (2018 ONS)	Sustainability Score 2020 **	Housing Allocation in Draft/Made Neighbourhood Plan	Local Plan Minimum Housing Requirement for NP Areas - Babergh (Pre-Submission Nov2020) ***
Polstead - Hadleigh Heath	Hamlet				4		n/a
Polstead - Heath, Mill Street, Whitestreet Green	Hamlet				2		n/a
Preston St Mary	Hamlet			195	7		n/a
Preston St Mary - Whelp Street	Hamlet				1		n/a
Raydon - Lower Raydon	Hamlet				2		n/a
Shimpling Street	Hamlet			438	5		n/a
Shotley - Church	Hamlet				4		n/a
Somerton	Hamlet			201	3		n/a
Stanstead - Lower/Upper	Hamlet			334	3		n/a
Stoke by Nayland - Thorington Street	Hamlet				1	See Stoke by Nayland (Hinterland Village)	See Stoke by Nayland (Hinterland Village)
Tattingstone - Heath	Hamlet				4		n/a
Tattingstone - White Horse	Hamlet				7		n/a
Thorpe Morieux	Hamlet			281	3		n/a
Wattisham	Hamlet			...	5		n/a
Wenham Magna	Hamlet			178	3		n/a
Woolverstone	Hamlet			287	8		26
Population Sub-Total				8708			
TOTALS:				63411		567	936

* Located within the Ipswich Fringe

** BMS JLP Settlement Hierachy Review, November 2020

*** Local Plan Minimum Housing Requirement for NP Areas - Babergh (Pre-Submission Nov 2020), Table 04



ANNEX 2

Adopted Built Up Area Boundary – Whatfield

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Whatfield



scale 1:5000

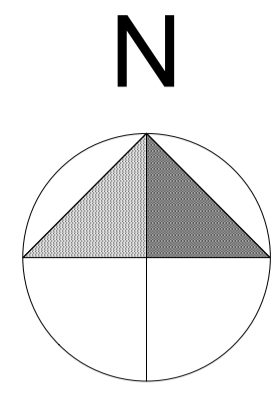
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Babergh District Council 100023274 2007



ANNEX 3

Proposed Site Location Plan, Indicative Site Layout Plan, Computer Generated Images & Materials Palette

Deliverable Housing Site - Land North of The Street, Whatfield



REVISION	DESCRIPTION	DATE
	STATUS: PRELIMINARY	
	TITLE: Existing Site Plan	
	PROJECT: PROPOSED RESIDENTIAL DEVELOPMENT LAND NORTH OF THE STREET WHATFIELD	
	CLIENT: M Chisnall & Sons Ltd	
	SCALE: 1:500/A1	DATE: 09.19
	JOB NO.: 1120	DRAWING NO.: 01

Proposed Residential Development Land North of The Street - Whatfield Proposed Plan 1 : 500

Plot:	Bedrooms	Area	Market/Affordable
1	3 Bed House	90m2	Affordable
2	2 Bed House	80m2	Affordable
3	2 Bed House	80m2	Affordable
4	2 Bed House	80m2	Affordable
5	3 Bed House	90m2	Affordable
6	3 Bed House	120m2	Market
7	3 Bed House	120m2	Market
8	4 Bed House	160m2	Market
9	4 Bed House	130m2	Market
10	3 Bed House	120m2	Market
11	4 Bed House	160m2	Market
12	4 Bed House	160m2	Market
13	2 Bed Bungalow	75m2	Market
14	2 Bed Bungalow	75m2	Market
15	4 Bed House	130m2	Market

Key:	Road surface
	Adoptable tarmac road surface
	Tar spray / shingle 'informal' road surface
	Block paved driveway

Car & Cycle parking provision	car spaces	cycle spaces
2 bed house & 2 bed bungalow	2	2
3 bed house	2	2
4 bed house	3	2
Visitor parking	6 + 1 ptw	2



REV	DESCRIPTION	DATE
A	Parking / cycle spaces updated	24.11.20
B	Minor layout updates	11.01.21

TITLE: SITE LAYOUT

PROJECT: PROPOSED RESIDENTIAL DEVELOPMENT
LAND NORTH OF THE STREET
WHATFIELD, SUFFOLK

CLIENT: M CHISNALL & SONS

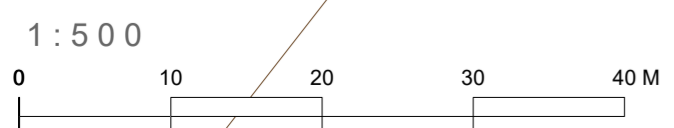
SCALE: 1:500@A1 DATE: OCT 2020

STATUS: PRELIMINARY DRAWN: JS

JOB NO: 1505 DRAWING NO: 02 B

Box Valley
Architectural Design
www.boxvalleydesign.com
13 Gallows Hill, Hadleigh, Suffolk, IP7 6DD
office@boxvalleydesign.com
07950 582730

Do not scale from drawings. Work to figured dimensions only.











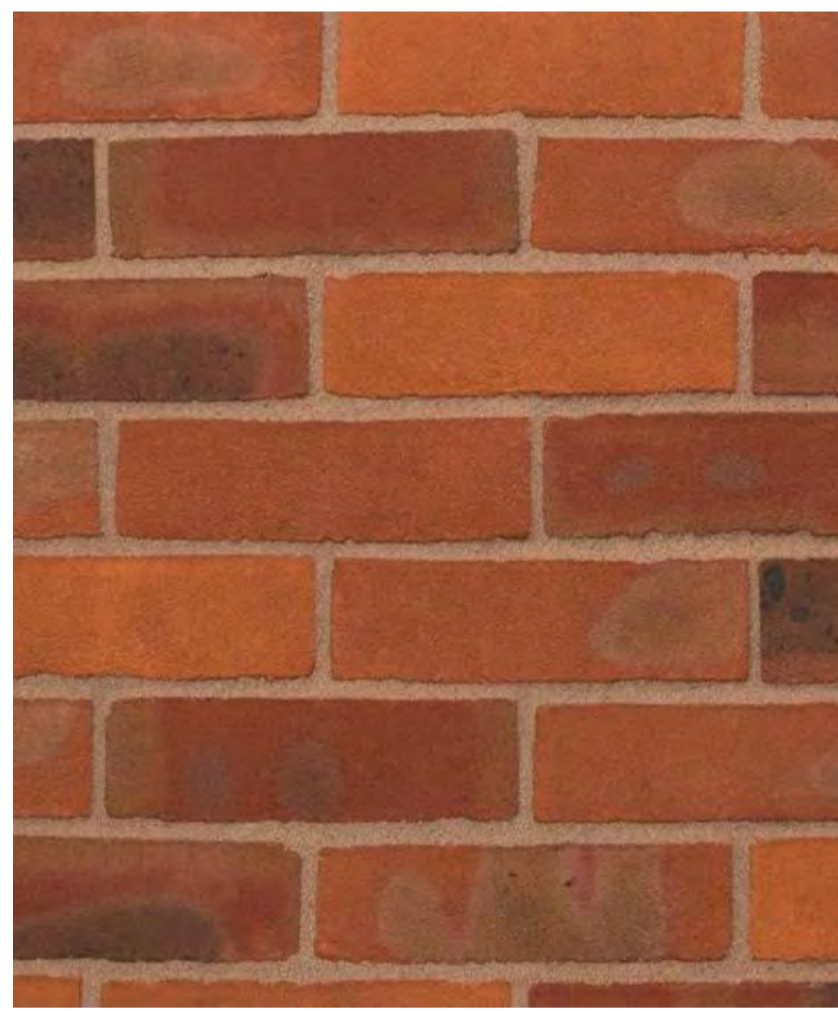
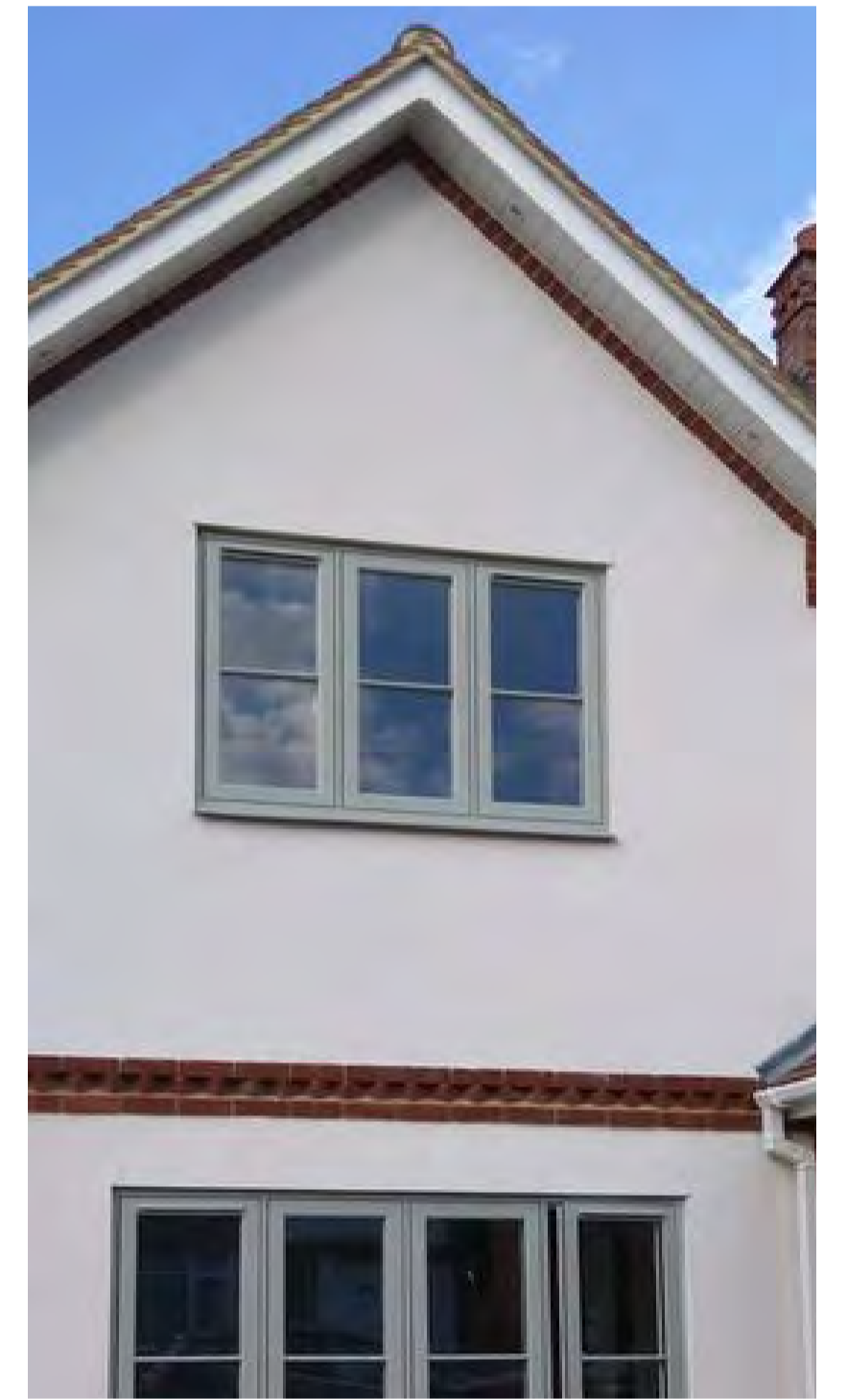
Roofs: Clay pan tiles



Timber weatherboarding



White / coloured render

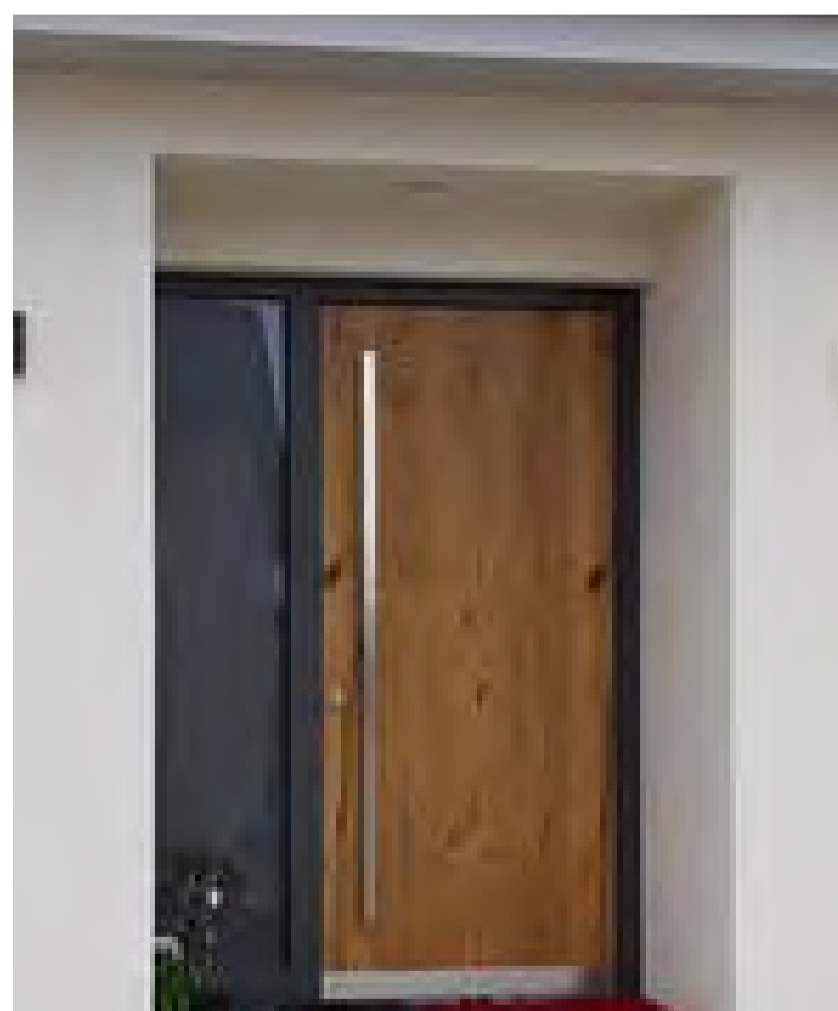


Suffolk red brickwork

Timber porches



Cement board cladding



Brick plinths



MATERIAL
MOOD
BOARD



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Planning Policy Team

Babergh & Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2X

jameslawson@lppartnership.co.uk

Tel 01206 835150

Co. Reg. No. 5677777

23rd December 2020

Dear Sir/Madam

Babergh & Mid Suffolk Joint Local Plan 2018-2037, Pre-Submission Regulation 19 Consultation (November 2020) – Representations on behalf M Chisnall & Sons Ltd

We write on behalf of M Chisnall & Sons Ltd who control vacant land North of The Street, Whatfield which is suitable and available for housing, and **OBJECT** to the Babergh & Mid Suffolk Pre-Submission Joint Local Plan (JLP) for the following reasons.

The JLP is not considered to meet the ‘soundness’ requirements for Plan Making set out in paragraph 35 of the National Planning Policy Framework (NPPF) as the Plan is not considered to be;

- ❖ **Positively Prepared** - as the housing strategy does not meet Whatfield’s objectively assessed housing needs over the plan period;
- ❖ **Justified** - as housing growth is inappropriately (& inconsistently) distributed across the Hinterland & Hamlet Villages within the Babergh DC area & Whatfield’s built up area boundary is illogically drawn precluding sustainable housing growth;
- ❖ **Effective** - as it omits to deliver any growth to sustain Whatfield’s existing physical & social infrastructure, including services & community facilities provision;
- ❖ **Consistent with National Policy** - as it fails to make satisfactory provision to meet Whatfield’s local housing needs or support existing physical/ social infrastructure & services provision over the Plan Period;

In support of these representations, we enclose the following information;

- ❖ A housing growth schedule for the Babergh hinterland & hamlet villages;
- ❖ A Whatfield Settlement Boundary Analysis;
- ❖ A revised inset map for Whatfield;

- ❖ A site location plan;
- ❖ An illustrative layout plan identifying the site's potential for up to 15 dwellings;
- ❖ 4 x Form-based objections to;
 - Part 1, Section 8, Policy SP03 Settlement Hierarchy;
 - Part 1, Section 9, Para 09.08 (SHELAA);
 - Part 1, Section 9, Table 4 Minimum Housing Requirements Neighbourhood Plan Areas;
 - Part 3, Whatfield Place Map;

The key points arising in relation to the draft Plan's soundness failings are summarised below.

Positively Prepared – Plan Fails To Meet This Criteria

By applying the 'standard method' for identifying housing needs, and using a proportional approach based on the village's population and the 9% housing spatial distribution for Hinterland Villages set out in Policy SP04 of the Babergh & Mid Suffolk Joint Local Plan Pre Submission Consultation November 2020 (JLP) Whatfield is considered to have a 'minimum' housing requirement of 21 units.

This figure is arrived at by dividing Whatfield's current population of 381 (2018 ONS) into the 15,918 population of the Hinterland Villages (less the East Bergholt – East End and Shotley Gate localities where needs are met within the East Bergholt and Shotley Street Core Villages) which equates to $2.4\% \times 866 \text{ homes} = 20.78$ (21 homes).

This approach has been adopted by the adjoining hamlet village of Aldham. The Aldham Neighbourhood Plan was 'Made' in January 2020 following examination, and allocates sites for 12 dwellings and allows for an additional 3 windfall dwellings (15 total) to come forward across the plan period to 2036/37.

It is noteworthy that although listed as a 'Hamlet Village' with fewer facilities and lower sustainability than Whatfield, by adopting an evidenced based approach to identifying its housing needs, its housing strategy met the 'basic conditions' necessary to proceed through the Examination Stage to being 'Made'.

An alternative approach to identifying Whatfield's housing needs based on its forecasted population growth over the period 2018-2037, indicates a similar housing need of 20 homes as follows;

- ❖ $381 \text{ population} \times 0.7\% \text{ annual population increase (ONS data 2014)} = 2.667 \times 19 \text{ years} = 50.673$: Divided by Whatfield's 2.5 average household size = 20.269 (20) homes.

The Regulation 14 version of the Draft Whatfield Neighbourhood Development Plan (August 2020) indicates following consultation, that there is a stated community preference for development proposals to enable a 'mixed and inclusive' community to come forward, comprising of family housing, 1 – 2 bed homes for first time buyers, housing for older people in the form of bungalows, affordable and key worker housing.

To demonstrate soundness, the local plan therefore ought to make provision for up to 20 homes (21 OAN – 1 unit commitment as @ 1/4/18 = 20 homes) to meet the identified need and stated community preference for mixed and inclusive housing in the emerging Neighbourhood Plan, e.g. by bringing forward 13 market and 7 affordable dwellings @ 35% provision.

Allocation of the site comprising the vacant land at North of The Street (please see location plan and illustrative layout plan *enclosed*) would make a significant contribution to meeting the village's local housing needs by delivering 15 dwellings, e.g. in the form of 10 market and 5 affordable (2-4 bed) dwellings, including bungalows for older people, as envisaged in the enclosed layout plan.

Justified – Plan Fails To Meet This Criteria

Housing Spatial Distribution – Hinterland & Hamlet Villages

It is evident that housing growth is currently inappropriately (and inconsistently) distributed across the Hinterland & Hamlet Villages within the Babergh DC area. Furthermore, Whatfield's built up area boundary is illogically drawn precluding sustainable housing growth from coming forward.

A housing growth schedule has been prepared to demonstrate that the Council's current housing spatial distribution strategy for hinterland and hamlet villages is inappropriate, and inconsistent, as it does not reflect the findings of its own 'Settlement Hierarchy Review'. The housing growth schedule is *enclosed*.

An example of the unjustified and inconsistent and approach being taken to date, and being advocated in the JLP, is illustrated by reproducing part of the information contained within the JLP Table 4 (Minimum housing requirement for NP Areas) below;

- ❖ Chilton (Hinterland Village) Sustainability Score (10) Minimum JLP/NP figure =161 units;
- ❖ Bentley (Hinterland Village) Sustainability Score (13) Minimum JLP/NP figure = 52 units;
- ❖ Woolverstone (Hamlet Village) Sustainability Score (8) Minimum JLP/NP figure = 26 units;
- ❖ Lawshall Bury Road (Hamlet Village) Sustainability Score (2) Minimum JLP/NP figure =23 units;
- ❖ Hitcham (Hamlet Village) Sustainability Score (2) Minimum JLP/NP figure =17 units;
- ❖ Aldham (Hamlet Village) Sustainability Score (7) Minimum JLP/NP figure = 13 units;

- ❖ Whatfield (Hinterland Village) Sustainability Score (12) JLP/NP figure =1 unit *inclusive of the 1 unit commitment @ 1/4/18 **

Whatfield Built Up Area Boundary Illogically Drawn

Supplementary Planning Guidance which defined the Built-Up Area Boundaries (BUAB's) for villages, was adopted by the District Council in 1995. The boundaries were subsequently updated and incorporated into the Adopted Babergh Local Plan Alteration No.2 (2006) and Adopted Core Strategy (2014).

Paragraph 3.38 of the Local Plan (2006) states, in addition to identifying the extent to which a settlement can be developed, the purpose of BUAB's is to:

- ❖ Protect the open countryside, and in particular areas of high landscape value;
- ❖ Strengthen and complement Conservation Area boundaries and policies;
- ❖ Protect important trees, vegetation and biodiversity;
- ❖ Protect important archaeological features;
- ❖ Protect important open spaces and recreational areas within and immediately without the defined boundary;
- ❖ Avoid coalescence of adjoining settlements
- ❖ Accommodate changes in development within settlements*; and
- ❖ Identify a logical and defensible boundary that retains a relatively compact form*.

The settlement boundary as drawn (and reviewed by LUC as part of the JLP Sustainability Appraisal Scoping Report process this year) does not observe or correctly apply the BUAB criterion set out above in respect of Whatfield.

With this in mind, it is noteworthy that the site was submitted for residential development in response to the JLP 'Call for Sites' exercise in 2019. The Officers and LUC subsequently assessed the site (Ref. SS1240) to determine its suitability, availability and achievability. Sites that met the tests were considered to be 'reasonable' sites for the purposes of SA.

Officers subsequently discounted the site due to its 'poor relation to existing settlement pattern'. In fact, the site is located at the centre of the village (partly within/ partly outside the settlement boundary) and is visually separated from the surrounding countryside by established natural tree/hedgerow/ ditch features. It is therefore clearly suitable, available and achievable and is therefore a 'reasonable' site.

The site boundaries which comprise the rear gardens of existing development to the south, along with established well treed/ hedgerow/ ditch feature boundaries to the east, west and north, provide a logical and defensible boundary, that retains a relatively compact form for the village.

The site therefore warrants inclusion within the village built up area boundary, and to demonstrate this position, LPP's settlement boundary analysis taking the form of a presentation document to

Whatfield Parish Council, dated January 2020, along with a revised settlement boundary plan outlining the changes requested to the settlement boundary are *enclosed*.

Effective – Plan Fails To Meet This Criteria

For the reasons outlined above, the Plan unfortunately omits to deliver any growth to sustain Whatfield's existing physical and social infrastructure, including services & community facilities provision.

It is evident from the Regulation 14 Version of the Whatfield Neighbourhood Development Plan, that the village's existing facilities and amenities (such as the village hall, primary school and play areas) are considered to be of key importance - with the consultation exercise evidencing this position as 'overwhelming' as reflected in the questionnaire responses.

It is also understood that there are a number of key infrastructure investment projects which are considered to be a high priority for delivery. These include a 'safe route to the primary school' (as there is no complete off road/ footway provision) along with traffic calming measures to reduce traffic speeds through the village, and improve school student and general pedestrian safety and amenity. LPP and Cottee Transport Planning's technical work and related discussions with the School and Highway Authority are currently ongoing in this respect.

With this in mind, it is considered that allocation of the vacant land North of The Street for residential purposes (up to 15 dwellings as envisaged above) could make a positive contribution to the ongoing vitality and viability of the village hall, primary school and local community life, and deliver a safe route to the primary school along with traffic calming measures.

Consistent with National Policy – Plan Fails To Fully Meet This Criteria As Respects Whatfield & Its Spatial Distribution For The Hinterland & Hamlet Villages

For the reasons outlined above, the Plan is not currently considered to be fully consistent with National (NPPF) Policy, as it;

- ❖ Fails to meet Whatfield's objectively assessed local housing needs;
- ❖ Prescribes an inappropriate and inconsistent approach to growth within the Babergh hinterland and hamlet villages;
- ❖ Adopts an illogical approach to drawing Whatfield's built up area boundary - precluding sustainable housing growth from coming forward;
- ❖ Fails to sustain Whatfield's existing community facilities & services, & village vitality, making no provision for much needed social & physical infrastructure investment to come forward over the Plan Period to 2037;

- ❖ Fails to facilitate any residential CIL funding through its allocation strategy, or otherwise deliver the housing & community facility & amenity priorities set out in the Draft Whatfield Neighbourhood Development Plan;

Changes Requested To Make The Plan Sound

The following changes to the Plan are therefore respectfully requested in order to make the Plan Sound in the context of these representations;

- 1) Revise Table 4 – Minimum housing requirement for NP Areas to include 21 Total Homes for Whatfield (note 1 unit is committed @ 1/4/18);**
- 2) Revise the Built Up Area Boundary (Settlement Boundary) for Whatfield to include all the vacant land North of The Street within it;**
- 3) Allocate the site associated with the vacant land North of The Street, Whatfield for residential purposes, comprising up to 15 dwellings;**

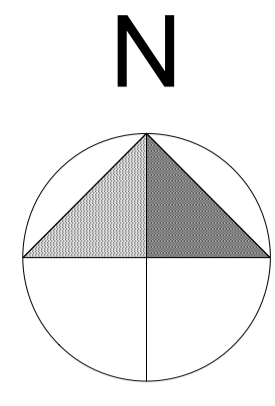
We trust this is of assistance and look forward to progressing these matters at the Independent Examination (Regulation 24) stage of the JLP.

In the meantime, should the Officers subsequently consider that the requested changes warrant further consideration in advance of the Examination, we would be pleased to liaise at an early stage, with a view to agreeing a suitable position as part of a 'Statement of Common Ground'.

Please acknowledge receipt of these representations, and we look forward to liaising with Officers at the next stages of the JLP process.

Yours sincerely

James Lawson
Lawson Planning Partnership Ltd
Encs






**Babergh & Mid Suffolk Joint Local Plan
Pre-Submission (Regulation 19)
Consultation (November 2020)**

REVISION	DESCRIPTION	DATE
	STATUS	PRELIMINARY
	TITLE	Existing Site Plan
	PROJECT	PROPOSED RESIDENTIAL DEVELOPMENT LAND NORTH OF THE STREET WHATFIELD
	CLIENT	M Chisnall & Sons Ltd
	SCALE	1:500/A1 DATE 09.19
	JOB NO.	1120 DRAWING NO. 01

Proposed Residential Development Land North of The Street - Whatfield Proposed Plan 1 : 500

Key:	Bedrooms	Quantity	Plots	Area	Market/Affordable
	2 Bed House	3	2,3,4	80m2	Affordable
	2 Bed Bungalow	2	13,14	65m2	Market
	3 Bed house	2	1,5	90m2	Affordable
	3 Bed House	3	6,7,10	120m2	Market
	4 Bed House	2	9,15	130m2	Market
	4 Bed House	3	8,11,12	160m2	Market

Key:	Road surface
	Adoptable tarmac road surface
	Tar spray / shingle 'informal' road surface
	Block paved driveway

Car & Cycle parking provision	car spaces	cycle spaces
2 bed house & 2 bed bungalow	2	2
3 bed house	2	2
4 bed house	3	2
Visitor parking	6 + 1 ptw	2



REV	DESCRIPTION	DATE
A	Parking / cycle spaces updated	24.11.20

TITLE: SITE LAYOUT

PROJECT: PROPOSED RESIDENTIAL DEVELOPMENT
LAND NORTH OF THE STREET
WHATFIELD, SUFFOLK

CLIENT: M CHISNALL & SONS

SCALE: 1:500@A1 DATE: OCT 2020

STATUS: PRELIMINARY DRAWN: JS

JOB NO: 1505 DRAWING NO: 02 A

Box Valley
Architectural Design
www.boxvalleydesign.com
13 Gallows Hill, Hadleigh, Suffolk, IP7 6DD
office@boxvalleydesign.com
07950 582730

Do not scale from drawings. Work to figured dimensions only.

Housing Growth Schedule – Babergh Hinterland & Hamlet Villages

Table 1 Hinterland & Hamlet Villages – Ranked by Minimum Neighbourhood Plan Housing Requirement:

Key:

Minimum Neighbourhood Plan Housing Requirement
JLP Housing Allocation



No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
1	Copdock and Washbrook*	Hinterland Village	13	238 (LA008 & LA009)	274
2	East Bergholt – East End	Hinterland Village	10	0	(241) East Bergholt Core Village
3	Chilton	Hinterland Village	10	130 & 20 (LA041 & LS01)	161
4	Holbrook – Lower	Hamlet	4	0	(65) Holbrook Core Village
5	Stutton	Hinterland Village	15	54 (LS01 x3)	65
6	Bentley	Hinterland Village	13	20 (LS01)	52
7	Chelmondiston	Hinterland Village	17	39 (LS01 x2)	52
8	Elmsett	Hinterland Village	16	41 (LS01)	49
9	Elmsett – Rookery Road	Hamlet	2	0	(49) Elmsett
10	Leavenheath - Harrow Street	Hamlet	5	0	44
11	Leavenheath - High Road	Hamlet	7	40 (LA098)	(44) Harrow Street
12	Leavenheath - Honey Tye	Hamlet	5	0	(44) Harrow Street
13	Great Waldringfield	Hinterland Village	17	0	39

No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
14	Assington	Hinterland Village	12	0	38
15	Stoke by Nayland	Hinterland Village	17	26 <i>(LS01 x3)</i>	27
16	Stoke by Nayland - Thorington Street	Hamlet	1	0	(27) Stoke by Nayland
17	Woolverstone	Hamlet	8	10 <i>(LS01 x2)</i>	26
18	Newton	Hinterland Village	11	0	23
19	Lawshall - Bury Road	Hamlet	2	20 <i>(LS01 x2)</i>	23
20	Lawshall - Lambs Lane	Hamlet	6	0	(23) Bury Road
21	Lawshall - Lawshall Green/ Hibbs Green	Hamlet	2	0	(23) Bury Road
22	Lawshall - Street	Hamlet	8	0	(23) Bury Road
23	Hitcham	Hinterland Village	13	12 <i>(LS01)</i>	17
24	Boxted	Hamlet	4	0	13
25	Aldham	Hamlet	7	12 <i>(LS01 x2)</i>	13
26	Hartest	Hinterland Village	9	0	12
27	Hartest – Cross Green	Hamlet	3	0	(12) Hartest
28	Little Waldingfield	Hamlet	6	0	4
29	Little Cornard – Bures Road	Hamlet	3	0	3
30	Little Cornard - Upper Road	Hamlet	3	0	(3) Bures Rd
31	Whatfield	Hinterland Village	12	0	1

No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
32	Acton – Newman’s Green	Hamlet	6	0	N/A
33	Alpheton	Hamlet	5	0	N/A
34	Alpheton – Bridge Street	Hamlet	3	0	N/A
35	Belstead*	Hinterland Village	9	14 (LA005)	N/A
36	Boxford – Calais Street	Hamlet	2	0	N/A
37	Boxford – Stone Street	Hamlet	3	5 (LS01)	N/A
38	Brantham – Sutton Road	Hamlet	7	0	N/A
39	Brent Eleigh	Hamlet	5	0	N/A
40	Brettenham	Hamlet	6	0	N/A
41	Burstall	Hinterland Village	11	0	N/A
42	Chattisham	Hamlet	3	0	N/A
43	Chelmondiston – Ling’s Lane	Hamlet	1	0	N/A
44	Chelmondiston – Pin Mill	Hamlet	4	0	N/A
45	Chelsworth	Hamlet	7	0	N/A
46	Cockfield – Cross Green	Hamlet	1	61 (LS01 x2)	N/A
47	Cockfield – Great Green	Hamlet	6		N/A
48	Cockfield – How Lane	Hinterland Village	12		N/A
49	Cockfield – Mackenzie Place	Hamlet	5		N/A
50	Cockfield – Windsor Green	Hamlet	4		N/A

No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
51	Cornard Tye	Hamlet	8	0	N/A
52	Edwardstone – Mill Green	Hamlet	4	0	N/A
53	Edwardstone – Sherbourne Street	Hamlet	2	0	N/A
54	Erwarton	Hamlet	4	0	N/A
55	Freston	Hamlet	5	0	N/A
56	Great Cornard – Prospect Hill	Hamlet	5	0	N/A
57	Great Waldingfield – Church	Hamlet	8	32 (LS01)	N/A
58	Great Waldingfield – Upsher Green	Hamlet	7		N/A
59	Groton	Hamlet	7	0	N/A
60	Groton – Castlings Heath	Hamlet	1	0	N/A
61	Harkstead	Hamlet	6	0	N/A
62	Highham	Hamlet	2	0	N/A
63	Hintlesham	Hinterland Village	14	6 (LS01)	N/A
64	Hitcham – Cross Green	Hamlet	2	0	N/A
65	Hitcham – The Drive	Hamlet	2	0	N/A
66	Hitcham – The Water Run	Hamlet	2	0	N/A
67	Holton St Mary	Hamlet	7	12 (LS01)	N/A
68	Kersey	Hinterland Village	13	0	N/A

No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
69	Kersey – Kersey Tye	Hamlet	2	0	N/A
70	Kersey – Wicker Street Green	Hamlet	2	0	N/A
71	Kettlebaston	Hamlet	4	0	N/A
72	Layham - Lower	Hamlet	4	0	N/A
73	Layham - Upper	Hamlet	8	0	N/A
74	Lindsey - Church	Hamlet	4	5 (LS01)	N/A
75	Lindsey Tye	Hamlet	2		N/A
76	Milden	Hamlet	3	0	N/A
77	Monks Eleigh	Hinterland Village	10	0	N/A
78	Monks Eleigh - Swingleton Green	Hamlet	2	0	N/A
79	Nedging Tye	Hamlet	7	0	N/A
80	Polstead - Bower House Tye	Hamlet	7	0	N/A
81	Polstead – Church	Hinterland Village	10	0	N/A
82	Polstead - Hadleigh Heath	Hamlet	4	0	N/A
83	Polstead - Mill Street	Hamlet	2	0	N/A
84	Polstead - Whitestreet Green	Hamlet	2	0	N/A
85	Polstead Heath	Hamlet	2	0	N/A
86	Preston St Mary	Hamlet	7	0	N/A
87	Preston St Mary - Whelp Street	Hamlet	1	0	N/A
88	Raydon	Hinterland Village	9	34 (LS01 x2)	N/A
89	Raydon - Lower Raydon	Hamlet	2	0	N/A

No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
90	Shimpling Street	Hamlet	5	0	N/A
91	Shotley - Church	Hamlet	4	0	N/A
92	Shotley Gate	Hinterland Village	9	0	N/A
93	Somerton	Hamlet	3	0	N/A
94	Stanstead - Lower	Hamlet	3	8	N/A
95	Stanstead - Upper	Hamlet		(LS01)	
96	Stratford St Mary	Hinterland Village	17	0	N/A
97	Tattingstone – Church	Hinterland Village	12	5	N/A
				(LS01)	
98	Tattingstone - Heath	Hamlet	4	0	N/A
99	Tattingstone - White Horse	Hamlet	7	0	N/A
100	Thorpe Morieux	Hamlet	3	0	N/A
101	Wattisham	Hamlet	5	0	N/A
102	Wenham Magna	Hamlet	3	6	N/A
				(LS01)	
103	Wherstead – Bourne Hill*	Hinterland Village	10	75	N/A
				(LA016)	
104	Wherstead Park*	Hinterland Village	13	0	N/A
Totals				925	1,242

* located within the Ipswich Fringe

* ⁱ BMS JLP Pre-Submission (Reg 19) Consultation Document (November 2020) Policy SP03, Table 2 – Babergh Settlement Hierarchy

* ⁱⁱ BMS JLP Reg 19 Consultation Topic Paper – Settlement Hierarchy Review, November 2020

* ⁱⁱⁱ BMS JLP Pre-Submission (Reg 19) Consultation Document (November 2020) – Policies Maps & Appendix 01 Housing Trajectory

* ^{iv} BMS JLP Pre-Submission (Reg 19) Consultation Document (November 2020), Table 04 – Minimum housing requirement for Neighbourhood Plan Areas (including outstanding planning permissions as at 1st April 2018)

Table 2 Hinterland & Hamlet Villages (Services & Facilities Detail) – Ranked by Sustainability Score

Key:

JLP Housing Allocation

Minimum Neighbourhood Plan Housing Requirement



No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	Convenience Store	Post Office	Food & Drink outlets (Max. of 5 points)*	Other Retail (Max. of 5 points)	Pre-School	Primary School	Secondary School/Sixth Form/Further Education	Strategic employment site within 5 km	Small scale employment site within 5km	Village Hall	Place of worship	Permanent Library	Doctors surgery	Chemist / pharmacy	Dentist	Peak time bus service	Peak time rail service	Recreational Grounds/ Play Area	Sport/ Leisure Centre	Allotment	Super-fast Broadband	Standard Speed Broadband	Town / Urban Area within 5km	Core village within 2km	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
1	Chelmondiston	Hinterland Village	17	2	1	2	2	1	2	0	0	0	1	1	0	0	0	0	2	0	1	0	0	2	0	0	0	39 (LS01 x2)	52
2	Great Waldringfield	Hinterland Village	17	2	1	1	0	1	2	0	2	0	1	0	0	0	0	0	2	0	1	0	1	0	1	2	0	0	39
3	Stoke by Nayland	Hinterland Village	17	2	1	2	1	0	2	0	0	0	1	1	0	0	0	0	2	0	1	0	1	2	0	0	1	26 (LS01 x3)	27
4	Stratford St Mary	Hinterland Village	17	2	1	3	2	1	2	0	0	0	1	1	0	0	0	0	2	0	1	0	0	0	1	0	0	0	N/A
5	Elmsett	Hinterland Village	16	2	1	1	0	1	2	0	2	0	1	1	0	0	0	0	0	0	1	0	0	2	0	2	0	41 (LS01)	49
6	Stutton	Hinterland Village	15	2	0	2	1	1	2	0	0	0	1	1	0	0	0	0	2	0	1	0	1	0	1	0	0	54 (LS01 x3)	65
7	Hintlesham	Hinterland Village	14	0	0	1	0	1	2	0	0	1	1	1	0	0	0	0	2	0	1	0	0	2	0	2	0	6 (LS01)	N/A
8	Bentley	Hinterland Village	13	2	0	1	0	0	2	0	0	0	1	1	0	0	0	0	2	0	1	0	1	2	0	0	0	20 (LS01)	52
9	Copdock and Washbrook*	Hinterland Village	13	0	0	1	0	1	2	0	0	1	1	1	0	0	0	0	2	0	1	0	1	2	0	0	0	238 (LA008 & LA009)	274
10	Hitcham	Hinterland Village	13	2	1	0	1	1	0	0	0	1	1	1	0	0	0	0	2	0	1	0	0	2	0	0	0	12 (LS01)	17
11	Kersey	Hinterland Village	13	0	0	1	0	0	2	0	2	0	1	1	0	0	0	0	0	0	1	0	1	2	0	2	0	0	N/A
12	Wherstead Park*	Hinterland Village	13	2	0	1	1	0	0	0	2	0	1	1	0	0	0	0	2	0	0	0	0	0	1	2	0	0	N/A
13	Assington	Hinterland Village	12	2	0	3	0	0	0	0	0	1	1	1	0	0	0	0	0	0	1	0	1	2	0	0	0	0	38
14	Cockfield – How Lane	Hinterland Village	12	2	1	0	0	1	2	0	0	0	1	1	0	0	0	0	2	0	0	0	0	2	0	0	0	61 (LS01 x2)	N/A
15	Tattingstone – Church	Hinterland Village	12	0	0	0	0	0	2	0	2	0	1	1	0	0	0	0	2	0	1	0	1	2	0	0	0	5 (LS01)	N/A
16	Whatfield	Hinterland Village	12	0	0	0	0	0	2	0	2	0	1	1	0	0	0	0	0	0	1	0	1	2	0	2	0	0	1

No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	Convenience Store	Post Office	Food & Drink outlets (Max. of 5 points)*	Other Retail (Max. of 5 points)	Pre-School	Primary School	Secondary School/Sixth Form/Further Education	Strategic employment site within 5 km	Small scale employment site within 5km	Village Hall	Place of worship	Permanent Library	Doctors surgery	Chemist / pharmacy	Dentist	Peak time bus service	Peak time rail service	Recreational Grounds/Play Area	Sport/ Leisure Centre	Allotment	Super-fast Broadband	Standard Speed Broadband	Town / Urban Area within 5km	Core village within 2km	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
17	Burstall	Hinterland Village	11	0	0	0	0	0	0	0	2	0	1	1	0	0	0	0	2	0	0	0	0	2	0	2	1	0	N/A
18	Newton	Hinterland Village	11	0	0	1	0	0	0	0	2	0	1	1	0	0	0	0	2	0	1	0	0	0	1	2	0	0	23
19	Chilton	Hinterland Village	10	0	0	0	0	0	0	0	2	0	0	0	0	2	0	0	2	0	0	0	0	2	0	2	0	130 + 20 (LA041 & LS01)	161
20	East Bergholt – East End	Hinterland Village	10	0	0	1	1	0	0	0	0	1	0	0	0	0	0	0	2	0	1	0	1	2	0	0	1	0	(241) East Bergholt
21	Monks Eleigh	Hinterland Village	10	2	1	1	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	0	1	2	0	0	0	0	N/A
22	Polstead – Church	Hinterland Village	10	2	1	2	1	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	1	0	N/A
23	Wherstead – Bourne Hill*	Hinterland Village	10	0	0	1	1	0	0	0	2	0	0	0	0	0	0	0	2	0	0	1	0	0	1	2	0	75 (LA016)	N/A
24	Belstead*	Hinterland Village	9	0	0	0	0	0	0	0	2	0	1	1	0	0	0	0	2	0	0	0	0	0	1	2	0	14 (LA005)	N/A
25	Hartest	Hinterland Village	9	0	0	1	0	1	2	0	0	0	1	1	0	0	0	0	2	0	0	0	0	0	1	0	0	0	12
26	Raydon	Hinterland Village	9	0	0	0	0	0	0	0	0	1	1	1	0	0	0	0	0	0	1	1	0	2	0	2	0	34 (LS01 x2)	N/A
27	Shotley Gate	Hinterland Village	9	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	2	0	1	0	0	2	0	0	1	0	N/A
28	Cornard Tye	Hamlet	8	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	2	0	0	0	0	2	0	2	0	0	N/A
29	Great Waldingfield – Church	Hamlet	8	0	0	0	0	0	0	0	2	0	0	1	0	0	0	0	0	0	0	0	0	2	0	2	1	32 (LS01)	N/A
30	Lawshall - Street	Hamlet	8	0	0	1	0	0	2	0	0	0	0	1	0	0	0	0	2	0	0	0	0	2	0	0	0	0	N/A
31	Layham - Upper	Hamlet	8	0	0	1	0	0	0	0	2	0	0	0	0	0	0	0	2	0	0	0	0	0	1	2	0	0	N/A
32	Woolverstone	Hamlet	8	0	0	0	0	0	0	0	0	1	1	1	0	0	0	0	2	0	0	0	1	2	0	0	0	10 (LS01 x2)	26
33	Aldham	Hamlet	7	0	0	0	0	0	0	0	2	0	0	1	0	0	0	0	0	0	0	0	0	2	0	2	0	12 (LS01 x2)	13
34	Brantham – Sutton Road	Hamlet	7	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	2	0	0	0	0	2	0	0	1	0	N/A
35	Chelsworth	Hamlet	7	0	0	1	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	0	0	2	0	0	1	0	N/A
36	Great Waldingfield – Upsher Green	Hamlet	7	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	2	0	2	1	0	0	N/A
37	Groton	Hamlet	7	0	0	1	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	0	0	2	0	0	1	0	N/A
38	Holton St Mary	Hamlet	7	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	2	0	1	0	0	0	1	0	1	12 (LS01)	N/A

No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	Convenience Store	Post Office	Food & Drink outlets (Max. of 5 points) [*]	Other Retail (Max. of 5 points)	Pre-School	Primary School	Secondary School/Sixth Form/Further Education	Strategic employment site within 5 km	Small scale employment site within 5km	Village Hall	Place of worship	Permanent Library	Doctors surgery	Chemist / pharmacy	Dentist	Peak time bus service	Peak time rail service	Recreational Grounds/ Play Area	Sport/ Leisure Centre	Allotment	Super-fast Broadband	Standard Speed Broadband	Town / Urban Area within 5km	Core village within 2km	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
39	Leavenheath - High Road	Hamlet	7	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	2	0	1	0	0	2	0	0	0	40 (LA098)	N/A
40	Nedging Tye	Hamlet	7	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	2	0	0	0	1	2	0	0	1	0	N/A
41	Polstead - Bower House Tye	Hamlet	7	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	2	0	2	0	0	N/A
42	Preston St Mary	Hamlet	7	0	0	1	0	0	0	0	0	0	1	1	0	0	0	0	2	0	1	0	0	0	1	0	0	0	N/A
43	Tattingstone - White Horse	Hamlet	7	0	0	1	0	0	0	0	2	0	0	0	0	0	0	0	2	0	0	0	1	0	1	0	0	0	N/A
44	Acton – Newman’s Green	Hamlet	6	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	1	2	1	0	0	N/A
45	Brettenham	Hamlet	6	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	2	0	1	0	0	0	1	0	0	0	N/A
46	Cockfield – Great Green	Hamlet	6	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	2	0	1	0	0	2	0	0	0	0	N/A
47	Harkstead	Hamlet	6	0	0	1	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	0	0	0	1	0	1	0	N/A
48	Lawshall - Lambs Lane	Hamlet	6	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	1	0	0	2	0	0	0	0	N/A
49	Little Waldingfield	Hamlet	6	0	0	1	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	0	0	2	0	0	0	0	4
50	Alpheton	Hamlet	5	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	0	0	2	0	0	0	0	N/A
51	Brent Eleigh	Hamlet	5	0	0	1	1	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A
52	Cockfield – Mackenzie Place	Hamlet	5	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	2	0	0	0	0	N/A
53	Freston	Hamlet	5	0	0	0	0	0	0	0	2	0	0	1	0	0	0	0	0	0	0	0	1	0	1	0	0	0	N/A
54	Great Cornard – Prospect Hill	Hamlet	5	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	0	0	N/A
55	Leavenheath - Harrow Street	Hamlet	5	0	0	1	0	0	0	0	0	1	0	0	0	0	0	0	2	0	0	0	0	0	1	0	0	0	44
56	Leavenheath - Honey Tye	Hamlet	5	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	2	0	0	0	0	2	0	0	0	0	N/A
57	Shimpling Street	Hamlet	5	0	0	1	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	0	0	0	1	0	0	0	N/A
58	Wattisham	Hamlet	5	0	0	0	0	0	0	0	0	1	1	1	0	0	0	0	0	0	1	0	0	2	0	0	1	0	N/A
59	Boxted	Hamlet	4	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	2	0	0	0	0	0	1	0	0	0	13
60	Chelmondiston – Pin Mill	Hamlet	4	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	0	N/A
61	Cockfield – Windsor Green	Hamlet	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	2	0	0	0	0	N/A

No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	Convenience Store	Post Office	Food & Drink outlets (Max. of 5 points)*	Other Retail (Max. of 5 points)	Pre-School	Primary School	Secondary School/Sixth Form/Further Education	Strategic employment site within 5 km	Small scale employment site within 5km	Village Hall	Place of worship	Permanent Library	Doctors surgery	Chemist / pharmacy	Dentist	Peak time bus service	Peak time rail service	Recreational Grounds/ Play Area	Sport/ Leisure Centre	Allotment	Super-fast Broadband	Standard Speed Broadband	Town / Urban Area within 5km	Core village within 2km	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
62	Edwardstone – Mill Green	Hamlet	4	0	0	1	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A
63	Erwarton	Hamlet	4	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	1	0	N/A
64	Holbrook – Lower	Hamlet	4	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	0	(65) Holbrook
65	Kettlebaston	Hamlet	4	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	0	0	0	1	0	0	0	N/A
66	Layham - Lower	Hamlet	4	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	N/A
67	Lindsey - Church	Hamlet	4	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	1	0	0	0	1	0	0	5 (LS01)	N/A
68	Polstead - Hadleigh Heath	Hamlet	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	2	0	0	0	0	N/A
69	Shotley - Church	Hamlet	4	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0	1	0	1	0	N/A
70	Tattingstone - Heath	Hamlet	4	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	1	0	0	0	N/A
71	Alpheton – Bridge Street	Hamlet	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	1	0	N/A
72	Boxford – Stone Street	Hamlet	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	1	5 (LS01)	N/A
73	Chattisham	Hamlet	3	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	1	0	N/A
74	Hartest – Cross Green	Hamlet	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	1	0	0	0	N/A
75	Little Cornard – Bures Road	Hamlet	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	0	0	3
76	Little Cornard - Upper Road	Hamlet	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	2	0	0	(3) Bures Rd
77	Milden	Hamlet	3	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A
78	Somerton	Hamlet	3	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A
79	Stanstead - Lower	Hamlet	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	1	0	0	8 (LS01)	N/A
80	Stanstead - Upper	Hamlet																											
81	Thorpe Morieux	Hamlet	3	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A
82	Wenham Magna	Hamlet	3	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0	1	6 (LS01)	N/A
83	Boxford – Calais Street	Hamlet	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	N/A

No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	Convenience Store	Post Office	Food & Drink outlets (Max. of 5 points)*	Other Retail (Max. of 5 points)	Pre-School	Primary School	Secondary School/Sixth Form/Further Education	Strategic employment site within 5 km	Small scale employment site within 5km	Village Hall	Place of worship	Permanent Library	Doctors surgery	Chemist / pharmacy	Dentist	Peak time bus service	Peak time rail service	Recreational Grounds/ Play Area	Sport/ Leisure Centre	Allotment	Super-fast Broadband	Standard Speed Broadband	Town / Urban Area within 5km	Core village within 2km	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
84	Edwardstone – Sherbourne Street	Hamlet	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	N/A	
85	Elmsett – Rookery Road	Hamlet	2	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	(49) Elmsett
86	Highham	Hamlet	2	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A	
87	Hitcham – Cross Green	Hamlet	2	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A	
88	Hitcham – The Drive	Hamlet	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	N/A	
89	Hitcham – The Water Run	Hamlet	2	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A	
90	Kersey – Kersey Tye	Hamlet	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	N/A	
91	Kersey – Wicker Street Green	Hamlet	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	N/A	
92	Lawshall - Bury Road	Hamlet	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	20 (LS01 x2)	23	
93	Lawshall - Lawshall Green/ Hibbs Green	Hamlet	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	N/A	
94	Lindsey Tye	Hamlet	2	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A	
95	Monks Eleigh - Swingleton Green	Hamlet	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	N/A	
96	Polstead - Mill Street	Hamlet	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	N/A		
97	Polstead - Whitestreet Green	Hamlet																											
98	Polstead Heath	Hamlet																											
99	Raydon - Lower Raydon	Hamlet	2	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A	
100	Chelmondiston – Ling’s Lane	Hamlet	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A	
101	Cockfield – Cross Green	Hamlet	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A	
102	Groton – Castlings Heath	Hamlet	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	N/A	

No.	Village	Designation ⁱ	Sustainability Score ⁱⁱ	Convenience Store	Post Office	Food & Drink outlets (Max. of 5 points) [*]	Other Retail (Max. of 5 points)	Pre-School	Primary School	Secondary School/Sixth Form/Further Education	Strategic employment site within 5 km	Small scale employment site within 5km	Village Hall	Place of worship	Permanent Library	Doctors surgery	Chemist / pharmacy	Dentist	Peak time bus service	Peak time rail service	Recreational Grounds/ Play Area	Sport/ Leisure Centre	Allotment	Super-fast Broadband	Standard Speed Broadband	Town / Urban Area within 5km	Core village within 2km	JLP Housing Allocation & (Site Ref) ⁱⁱⁱ	Minimum Neighbourhood Plan Housing Requirement ^{iv}
103	Preston St Mary - Whelp Street	Hamlet	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	N/A
104	Stoke by Nayland - Thorington Street	Hamlet	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	(27) Stoke by Nayland	
																										925	1,242		

* located within the Ipswich Fringe

ⁱ BMS JLP Pre-Submission (Reg 19) Consultation Document (November 2020) Policy SP03, Table 2 – Babergh Settlement Hierarchy

ⁱⁱ BMS JLP Reg 19 Consultation Topic Paper – Settlement Hierarchy Review, November 2020

ⁱⁱⁱ BMS JLP Pre-Submission (Reg 19) Consultation Document (November 2020) – Policies Maps & Appendix 01 Housing Trajectory

^{iv} BMS JLP Pre-Submission (Reg 19) Consultation Document (November 2020), Table 04 – Minimum housing requirement for Neighbourhood Plan Areas (including outstanding planning permissions as at 1st April 2018)

Lawson Planning Partnership Ltd
Presentation on behalf of M. Chisnall & Sons Ltd
to Whatfield Parish Council

22 January 2020 (7.45pm) Meeting
at Whatfield Village Hall

Proposed Revision to
Village Settlement Boundary
Land North of The Street, Whatfield

January 2020

Lawson Planning Partnership Ltd

882 The Crescent
Colchester Business Park
Colchester
Essex, CO4 9YQ
01206 835150

www.lppartnership.co.uk



CHARTERED TOWN PLANNERS

M Chisnall & Sons Ltd: Land North of The Street, Whatfield Residential Development

Proposed Revision To The Village Settlement Boundary



Introduction

Local Plan Representations

On 26th September 2019 LPP submitted representations to the Babergh & Mid Suffolk Preferred Options Draft Joint Local Plan (July 2019), objecting to the Joint District Councils omission to revise the Whatfield village settlement boundary to include a 0.7ha vacant and underused site North of The Street, within the 'Built Up Area Boundary' of the village.

Settlement Policy - Purpose of Built Up Area Boundaries

In 1995 Babergh District Council adopted village planning policy guidelines to define built up area boundaries for villages, and the Babergh Local Plan Alteration No. 1 (1995) defined the settlement boundary for Whatfield.

Paragraph 3.38 of the Babergh Local Plan Alteration No. 2 (2006) states that the 'purpose' of Built Up Area Boundaries is to;

- ◇ Identify a logical & defensible boundary that retains a relatively compact form;
- ◇ Accommodate changes in development within settlements;
- ◇ Protect the open countryside, & in particular areas of high landscape value;
- ◇ Protect important trees, vegetation, biodiversity & archaeological features;
- ◇ Protect important open spaces & recreational areas within & immediately without the defined boundary;
- ◇ Strengthen & complement Conservation Area boundaries & policies;
- ◇ Avoid coalescence of adjoining settlements

With this in mind, the Babergh Local Plan Alteration No. 2 (2006) and Core Strategy (2014) maintained the current settlement boundary position for Whatfield.

The Babergh & Mid Suffolk Local Plan Preferred Options Draft Joint Local Plan (rolling the Plan Period forward from 2016 to 2036) currently proposes no changes to the original settlement boundary set in 1995.

The Case for Revising the Village Settlement Boundary

It is evident from the site survey work undertaken by LPP in September 2019 and January 2020, that the current line of the village settlement boundary no longer meets the District Council's local plan or supplementary planning guidance criteria.

In particular, the current settlement boundary is not considered to;

- ◇ Represent a logical & defensible boundary;
- ◇ Be consistent with the boundary principles applied elsewhere within Whatfield demarcating the northern extent of the village, which generally align the settlement limits with clear natural features on the ground, such as hedgerows & ditch features;
- ◇ Accommodate necessary change in order to meet the village's local housing needs to 2038;

The photographic survey evidence contained within this presentation, combined with LPP's submitted representations to the Joint local Plan Consultation, which identify a need for up to 20 new households (dwellings) within Whatfield to 2038, demonstrate that there is;

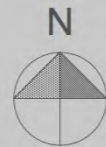
- ◇ A clear planning rationale & justification for extending the settlement boundary to incorporate the 0.7ha site at Land North of The Street;
- ◇ A need to provide for the redevelopment of a vacant & underused site which relates well to the village centre for housing purposes – such an approach would be consistent with the Built up Area Boundary criteria set out above;

Resolutions Sought From Whatfield Parish Council

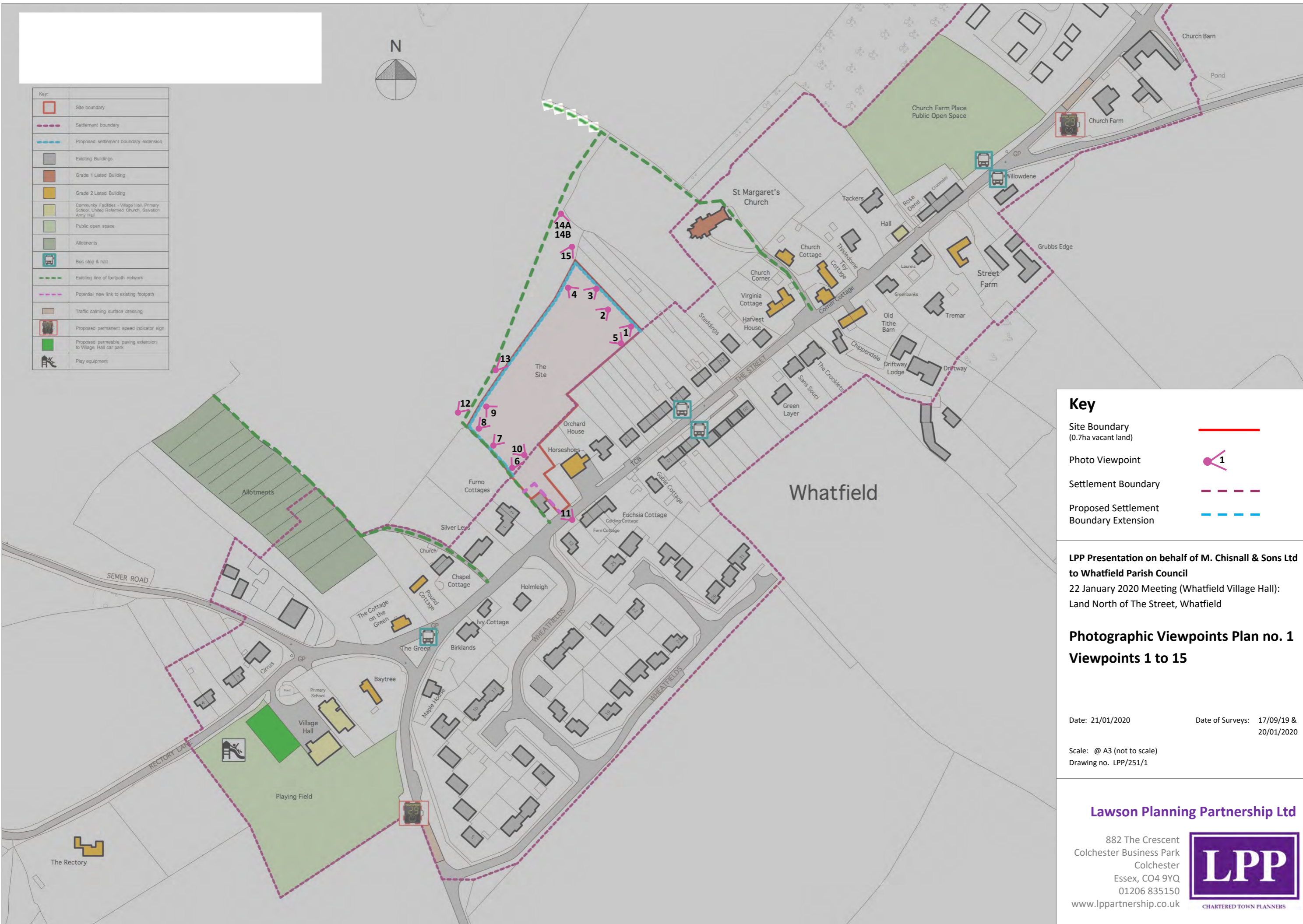
The following resolutions are respectfully sought from the Parish Council;

- A. The Parish Council resolve to support LPP's proposal on behalf of M Chisnall & Sons Ltd to revise & extend the village settlement boundary as set out in this document, & in LPP's representations to the Babergh & Mid Suffolk Preferred Options Draft Joint Local Plan (July 2019);
- B. The Parish Council note that the position at A above conveys its recognition that the vacant site is considered suitable for housing purposes in principle, with all details to be subsequently agreed through a future planning application process;

The photographic viewpoint plans and associated photographs arising from the site survey work, are outlined below.



Key:	
	Site boundary
	Settlement boundary
	Proposed settlement boundary extension
	Existing Buildings
	Grade 1 Listed Building
	Grade 2 Listed Building
	Community Facilities - Village Hall, Primary School, United Reformed Church, Salvation Army Hall
	Public open space
	Allotments
	Bus stop & halt
	Existing line of footpath network
	Potential new link to existing footpath
	Traffic calming surface dressing
	Proposed permanent speed indicator sign
	Proposed permeable paving extension to Village Hall car park
	Play equipment



Key	
Site Boundary (0.7ha vacant land)	
Photo Viewpoint	
Settlement Boundary	
Proposed Settlement Boundary Extension	

LPP Presentation on behalf of M. Chisnall & Sons Ltd to Whatfield Parish Council
 22 January 2020 Meeting (Whatfield Village Hall):
 Land North of The Street, Whatfield

Photographic Viewpoints Plan no. 1
Viewpoints 1 to 15

Date: 21/01/2020 Date of Surveys: 17/09/19 & 20/01/2020

Scale: @ A3 (not to scale)
 Drawing no. LPP/251/1

Lawson Planning Partnership Ltd

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Babergh District Council Place Maps

Whatfield (Hinterland)

LPP Presentation on behalf of M. Chisnall & Sons Ltd to Whatfield Parish Council
 22 January 2020 Meeting (Whatfield Village Hall)
 Land North of The Street, Whatfield

Photographic Viewpoints Plan no. 2 - Viewpoints 16 to 22

Date: 21/01/2020

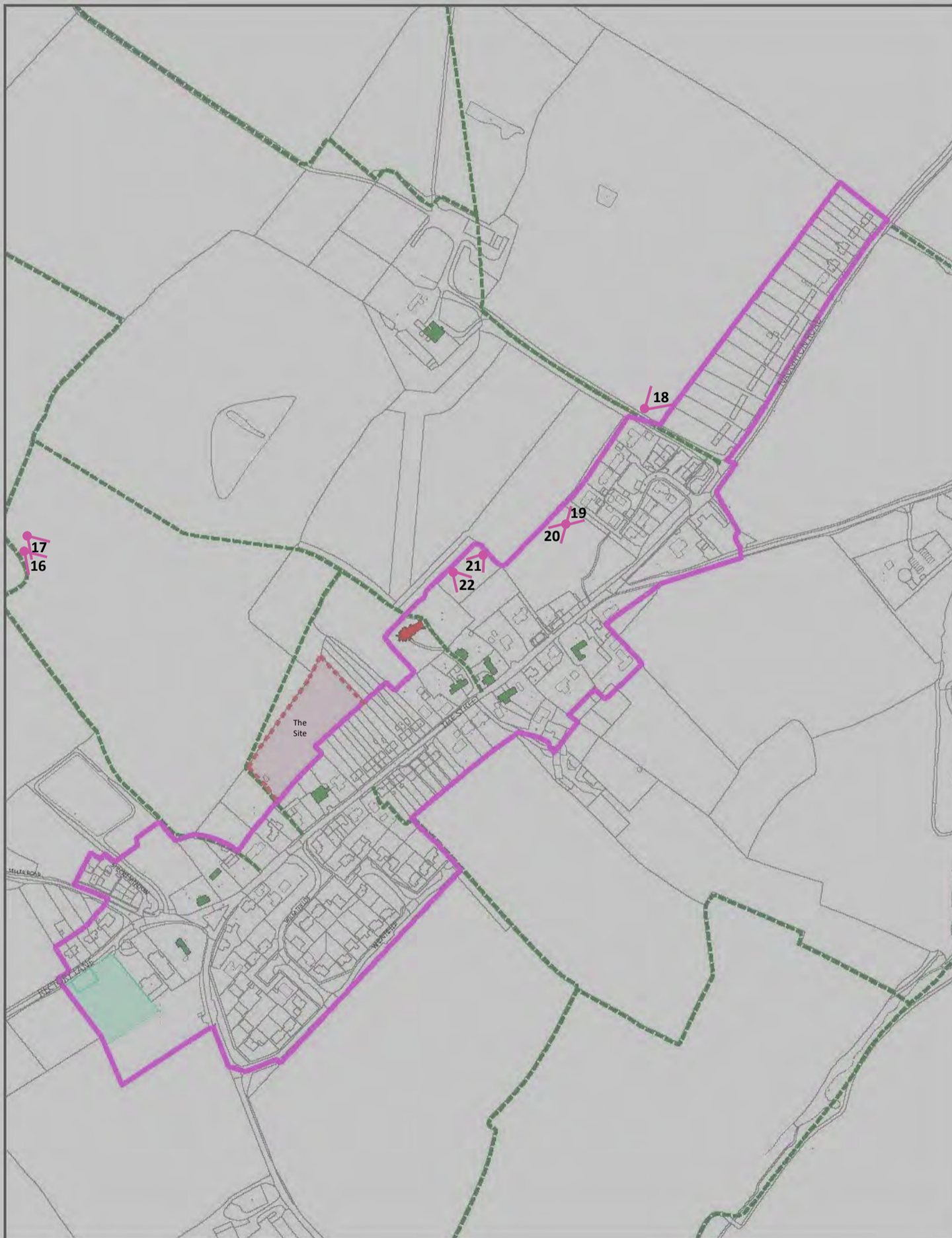
Date of Surveys: 17/09/2019 & 20/01/2020

Scale: @ A3 (not to scale)

Drawing no. LPP/251/2

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 Essex, CO4 9YQ
 01206 835150
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	Key Site Boundary (0.7ha vacantland) ——— Settlement Boundary ——— Photo Viewpoint — 16 Proposed Settlement Boundary - - -
	BABERGH DISTRICT COUNCIL Endeavour House, 8 Russell Rd, Ipswich, IP1 2BX Telephone : 0300 123 4000 www.babergh.gov.uk
SCALE 1:5000 Reproduced by permission of Ordnance Survey on behalf of HMSO © Crown copyright and database right 2019 Ordnance Survey Licence number 100023274	



Viewpoint 1: Looking SW across the site
Site relates closely to existing housing along The Street (20 January 2020)



Viewpoint 2: Looking SW across the site
Site enclosed by existing hedgerow boundary to north & visually relates to built up part of village (20 January 2020)



Viewpoint 3: Looking SW across the site
Site visually relates to built up part of village with open countryside beyond hedgerow to north (20 January 2020)



Viewpoint 4: Looking SE towards housing at The Street (20 January 2020)



Viewpoint 5: Looking NW along east boundary of site towards north boundary (20 January 2020)



Viewpoint 6: Looking NE across site towards Horseshoes side/rear boundary
Post & rail fence denotes current settlement boundary line & has limited, if any, planning rationale as a defensible boundary to 2038 (20 January 2020)



Viewpoint 7: Looking NE across site (20 January 2020)



Viewpoint 8: Looking NE across site
Site enclosed by hedgerow boundaries to north & east & housing to south boundary
(20 January 2020)



Viewpoint 9: Looking SE across site towards Horseshoes, The Traverse & properties at The Street (20 January 2020)



Viewpoint 10: Looking NW across site along west boundary
Open countryside lies beyond hedgerow boundary further to the north (20 January 2020)



Viewpoint 11: Looking NW into site from The Street
Post & rail fence in midground forms current settlement boundary line, & has limited if any, planning rationale as a defensible boundary to 2038 (20 January 2020)



Viewpoint 12: Looking NE along rear of site hedgerow boundary
Hedgerow forms a defensible boundary with open countryside to the north (20 January 2020)



Viewpoint 13: Looking NE along rear of site hedgerow boundary
Hedgerow forms a defensible boundary to the open countryside to the north (17 September 2019)



Viewpoint 14A: Looking S towards site
Hedgerow forms a defensible boundary to the open countryside located to the north
(20 January 2020)



Viewpoint 14B: Looking S towards site
Hedgerow forms a defensible boundary to the open countryside located to the north
(17 September 2019)



Viewpoint 15: Looking SW along rear of site hedgerow boundary
Hedgerow forms a defensible boundary to the open countryside located to the north (20 January 2020)



Viewpoint 16: Looking SE across arable field towards site
Site boundary hedgerow visually contains the built up part of the village from open countryside (20 January 2020)



Viewpoint 17: Looking SE across arable field towards site
Site boundary hedgerow visually contains the built up part of the village from open countryside (17 September 2019)



Viewpoint 18: Looking NE along rear hedgerow boundary of housing fronting Naughton Road
Hedgerow forms line of the settlement boundary (January 2020)



Viewpoint 19: Looking NE along rear ditch/ hedgerow boundary of Church Farm Place
Ditch/ hedgerow forms line of the settlement boundary (January 2020)



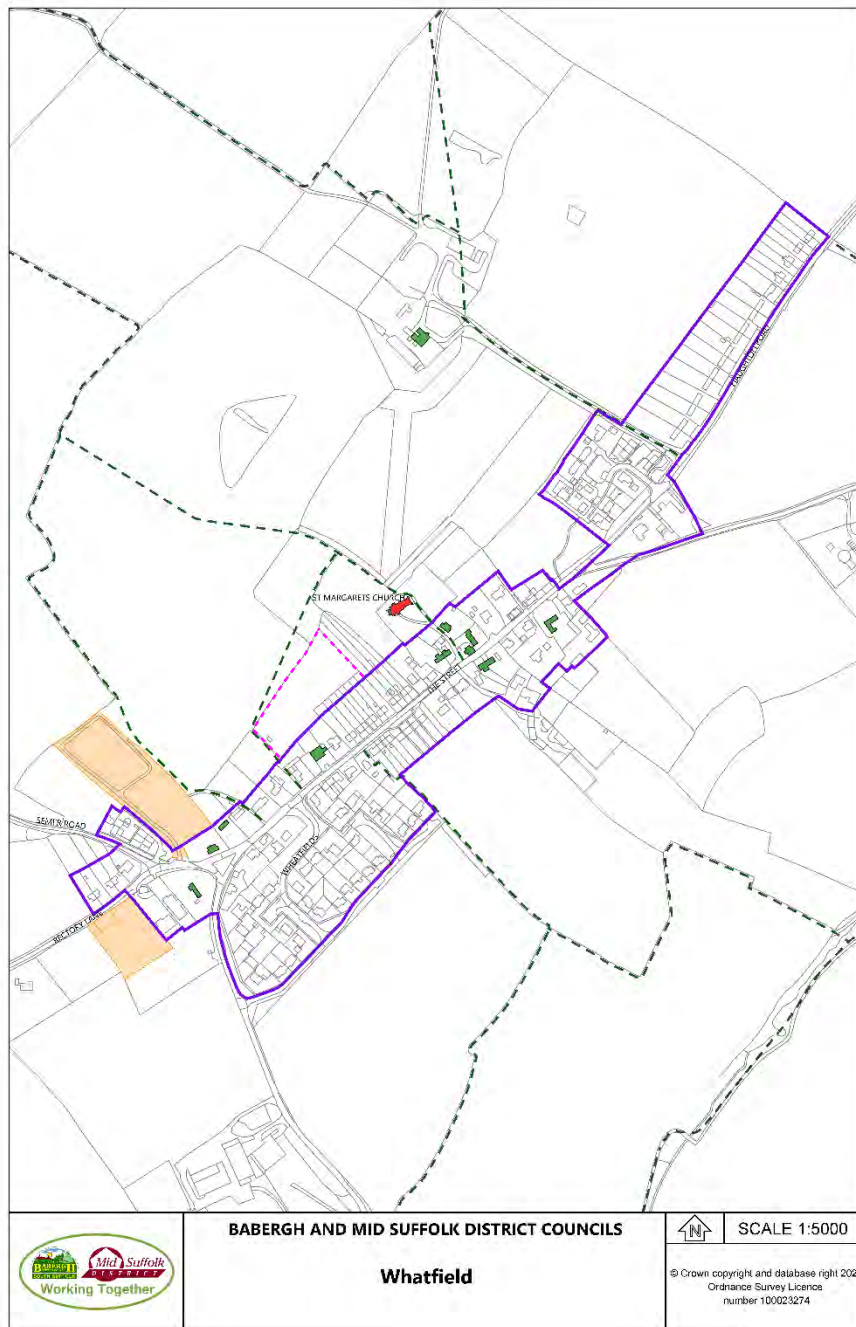
Viewpoint 20: Looking SW along rear hedgerow boundary enclosing open space at Church Farm Place
Hedgerow forms line of the settlement boundary (20 January 2020)



Viewpoint 21: Looking SW along ditch/ hedgerow boundary of cemetery east of St Margaret's Church
Ditch/ hedgerow forms line of the settlement boundary (20 January 2020)



Viewpoint 22: Looking S along cemetery hedgerow boundary towards housing at The Street
Hedgerow forms line of the settlement boundary (20 January 2020)



WHATFIELD (HINTERLAND)

Proposed Revision to village settlement boundary to accommodate residential development.

Lawson Planning Partnership Ltd, on behalf of Site Owner, M. Chisnall & Sons Ltd

KEY




Proposed revision to settlement boundary - - - - -

23rd December 2020

(12) Resident: Ashford

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 Ashford
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.		Policy No.	Policy WHAT1: Landscape Setting and Natural Features Policy WHAT5 Housing Mix Policy WHAT6 – The Whatfield Design Guide Policy WHAT4: New Housing
----------------------	--	-------------------	--

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

Support Yes

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

I am fully in agreement with the 5 core objectives outlined in the Plan.

With regard to policies, whilst I am in support of all of them, I would particularly like to state my support for policies 1, 5 and 6.

The landscape setting is an especially important element of Whatfield’s character. The unique nature of the village is created by its situation on a plateau and the views and landscape that are presented by this are a feature much prized by the village’s inhabitants. They provide a significant level of amenity and value economically, environmentally and from a physical and mental health perspective. The landscape must therefore be protected in line with Policy 1. I am particularly in favour of providing a net gain in biodiversity.

As with any village, the housing mix is critical and as such I support Policy 5. Whilst Whatfield has suffered from 20th century development (including demolition of what would now be viewed as historically important dwellings), it has managed to retain a degree of variation in the type and styles of houses present. Ensuring that this is maintained, with houses of varying size, style and value/cost is critical to maintaining a genuine village feel/sense of community. This is important from both a social (inclusivity, social cohesion etc) and visual (rural/village character) perspective.

In addition, I support the design guide (Policy 6) which I think has been very carefully put together in consultation with villagers.

Finally, whilst I feel the preferred threshold of 8 dwellings may be somewhat unrealistic, I am in support of the element of Policy 4 in relation to the support of individual houses or developments of up to 5 dwellings being supported. This will go a long way to ensuring any development neither feels ‘un-natural’ nor destroys the character of the village. Villages were generally not created by building vast developments, nor should they be. Their growth should be piecemeal and in proportion to what is already present.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

The only improvements would be detail with regard to what additional amenities should be developed (and how), should additional development be permitted. As it stands, the village is relatively devoid of amenities and does not have the sufficient infrastructure to accommodate anything more than minimal development

(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 (the Examiners Report)	
The final 'making' (adoption) of the Whatfield NDP by Babergh District Council	Y

Signed:

Dated: 18/01/21

[PLEASE NOTE: THIS PAGE IS INTENTIONALLY BLANK]

(13) Resident: Hartwell

By e-mail

Dated: 2 March 2021
To: BMSDC Community Planning
Subject: Whatfield Neighbourhood Plan R16 Consultation

To whom it may concern,

With regard to the Whatfield Neighbourhood Plan, we fully support this plan and would like to make the following comments:

1. We fully agree and support the design model and the use of high quality building materials as highlighted in the plan.
2. We also applaud the fact that the plan seeks to ensure that any future buildings are of the highest quality and gardens are large enough to aid a sense of wellbeing for future residents. This is in contrast to what has been delivered in Whatfield in recent times.
3. Although the plan states that 8 houses should be built over the plan period, we firmly believe that these 8 dwellings should be delivered incrementally, over that time and NOT in just one or two multiple groups, for example.

Thank you for giving us the opportunity to comment on the Whatfield Neighbourhood Plan.

Kind Regards

[Ends]

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(14) Resident: Mackenzie

By e-mail

Dated: 4 March 2021
To: BMSDC Community Planning
Subject: Whatfield Neighbourhood Plan

I would like to submit some comments on the Whatfield Neighbourhood plan, which are as follows:

1. Whilst we generally support this proposal we feel that up to 8 houses still represents a large increase in the number of total houses for this already congested village scene. Any developments should be incremental over the period of the plan.
2. The build quality is absolutely key to any new house - using the highest quality materials and ensuring that garden areas and size are treated in the same way.

Kind Regards,

[Ends]

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(15) Resident: Tweedy

By e-mail

Dated: 23 January 2021
To: BMSDC Community Planning
Subject: Whatfield Neighbourhood Plan REG 16 submission Consultation

Dear Paul

I have read the Whatfield Neighbourhood Plan and applaud the use of high quality, locally sourced and where possible organic materials. The sympathetic designs proposed are promising and look very positive and will benefit the village generally.

I am pleased to see that you have allowed for large gardens and plenty of space around the new houses, such a vital necessity in the current covid climate for both well being and personal protection.

I feel that 8 houses is still too many for this small area, I would prefer to see less housing and provision perhaps of a water area/pond to encourage wildlife.

Many thanks for considering my views.

[Ends]



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(16) Resident: Walker_1

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:	Ms Walker
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.	Section 7	Policy No.	
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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 would like to emphasise the significance of village feedback that Babergh should only approve planning for one-off dwellings that be added at incremental periods and dotted throughout the village, over the period to 2036. I feel that 8 houses over this period, given the recent numbers of new housing, is still too many for a village of this size, if it is to retain its character and appeal. It is vital that Babergh works for its residents and ensures that villages like Whatfield retain its charm and rural identity. Allowing the development of more than single dwellings in any one area will significantly compromise this.

The safety of residents must be of paramount importance. The lack of pathways and the narrow roads, along with the already considerable traffic through the village is hazardous. It is crucial that the quantity, speed and type of traffic travelling through Whatfield is analysed by Babergh before agreeing any further housing that will have environmental and safety implications for the people of Whatfield. Many homeowners along The Street do not have off road parking and so there is significant on road parking and temporary parking of delivery lorries also hinders the safety of residents. More junctions or drives accessing The Street will present further problems and present more risk to residents.

The very limited public transport in the village means that a car is essential. Several families choose not to send their children to the village school and at secondary level also choose alternative provision which requires car transport and so building extra family housing in the village will not necessarily mean these families take advantage of village amenities.

I really hope Babergh are sensitive to the views of villagers and the limitations on development that this rural community deserves. The preservation of the countryside, the environment and well-being of residents should come before financial gain when future planning applications are considered.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

That Babergh planning commits to limiting the number of future developments to one off houses dotted around the village, around the location.

That a traffic survey be undertaken on The Street in Whatfield to appreciate the pressures on the village before agreeing any further developments.

(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 (the Examiners Report)	✓
The final 'making' (adoption) of the Whatfield NDP by Babergh District Council	✓

Signed: 

Dated: 2nd March



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(17) Resident: Walker_2

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) Walker
Job Title (if applicable):	Headteacher
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.	Chapter 6 and 7	Policy No.	
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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:

Please be as brief and concise as possible ..

The hub of the village, The Street, is already very built up. Houses are in close proximity to each other, many have no or insufficient off road parking leading to significant parking on the road and the traffic is excessive (including considerable HGV use) given the narrow roads and lack of safe pathways for villagers. I would be very concerned at any suggested developments in this area which adds to this congestion and takes away the very limited green space there is.

I believe it is also crucial to protect the area around St Margaret's Church. As a key feature of the community, I hope that any planning committee considers the importance of protecting views of the church and the vicinity around it.

Finally, the view expressed in the Neighbourhood plan that new housing should be built from quality materials is key. In addition, I hope that Babergh planning committee explores fully the type of buyer who seeks to choose a home in a small village like Whatfield, as this ensures the cohesion of the community. Large gardens that allow for self-sufficiency are clearly important and supported by the demand for village allotment space which currently outstrips supply.

I hope the planning authority will work hard to prioritise the environment, the need for green space and the preferences of residents in order to ensure any future one-off builds are supported and embraced by villagers.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

That one storey buildings be considered rather than 2 storey, as this will protect views. That there is a commitment that any houses will have substantial, larger than average gardens.

That a full assessment of all aspects of health and safety be carried out on The Street to recognise the hazards that exist as a result of on road parking, heavy traffic use (including significant numbers of HGVs), limited pathways and poor visibility for residents reversing from driveways.

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 (the Examiners Report)	✓
The final 'making' (adoption) of the Whatfield NDP by Babergh District Council	✓

Signed: 	Dated: 4 th March 2021
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