

Debenham Neighbourhood Development Plan 2016 - 2036

Report by Independent Examiner

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Summary and Conclusion

1. The Debenham Neighbourhood Plan has a clear vision supported by five main objectives.
2. There is not an up-to-date strategic policy against which to assess overall housing figures. The Neighbourhood Plan has been produced in parallel with the production of the emerging Joint Local Plan. The Neighbourhood Plan allocates three sites for residential development. Whilst Policy DEB 1 specifies the allocated sites and windfall sites will provide up to 316 dwellings in the period 2016 to 2036, I have recommended that this policy is modified to refer to the provision of an estimate of around 316 dwellings and for there to be no restriction on the release of the site east of Aspall Road for development. I have found that all the allocated sites are deliverable and will contribute towards sustainable development.
3. I have recommended modification to some of the policies in the Plan, for the reasons set out in detail below. I have recommended the deletion of Policies DEB 6, DEB 7 and DEB 10. It is not possible to modify these policies to meet the Basic Conditions.
4. Even though I have recommended a number of modifications to the Plan, these do not significantly or substantially alter the intention or nature of the Plan.
5. **Whilst I have set out my reasoning under individual policies, my overall conclusion is that, subject to my recommendations, the Plan meets the Basic Conditions. It is appropriate to make the Plan. Subject to my recommendations being accepted, I consider that the Debenham Neighbourhood Plan 2016 - 2036 will provide a strong practical framework against which decisions on development can be made. I am pleased to recommend that the Debenham Neighbourhood Plan 2016 - 2036, as modified by my recommendations, should proceed to Referendum.**

Introduction

6. On 3 September 2014 Mid Suffolk District Council (MSDC) approved that the Debenham Neighbourhood Area be designated in accordance with the Neighbourhood Planning (General) Regulations 2012. The area covers the whole of the parish of Debenham.
7. The qualifying body is Debenham Parish Council. The Plan has been prepared by the Neighbourhood Plan Steering Committee on behalf of the Parish Council. The Plan covers the period 2016 - 2036.
8. I was appointed as an independent Examiner for the Debenham Neighbourhood Plan 2016 - 2036 in September 2018. I confirm that I am independent from the Parish Council and MSDC. I have no interest in any of

the land affected by the Plan and I have appropriate experience to undertake this examination. As part of my examination, I have visited the Plan area.

Legislative Background

9. As an independent Examiner, I am required to determine, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether:
 - the policies in the Plan relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
 - the Plan meets the requirements of Section 38B of the 2004 PCPA where the plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area; and
 - that the Plan has been prepared for an area that has been designated under the Localism Act 2011 and has been developed and submitted for examination by a qualifying body.
10. I am obliged to determine whether the Plan complies with the Basic Conditions. The Basic Conditions are:
 - having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan;
 - the making of the neighbourhood plan contributes to the achievement of sustainable development;
 - the making of the neighbourhood plan is in general conformity with the strategic policies contained in the Development Plan for the area of the authority; and
 - the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations and human rights requirements.
11. Subject to the modifications I have recommended in this report, I am content that these requirements have been satisfied.

EU Obligations

12. Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) (EA Regulations) set out

various legal requirements and stages in the production of a Strategic Environmental Assessment (SEA).

13. MSDC prepared a *Debenham Neighbourhood Plan Strategic Environmental Assessment Screening Determination* in March 2018. The determination refers to the *Debenham Neighbourhood Plan 2016 - 2036 Pre-Submission Draft Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment (HRA): Screening Report* (January 2018) for consultation prepared on behalf of MSDC by Essex Place Services. It concluded that the Plan should be screened in for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC. The statutory consultees agreed with this conclusion.
14. In the light of the *Screening Report* and the statutory consultees responses, the *Screening Determination* similarly concluded that the Debenham Neighbourhood Plan requires a Strategic Environmental Assessment in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004.
15. Essex Place Services prepared the *Debenham Neighbourhood Plan 2016 - 2036 Pre-Submission Draft Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment (HRA): Screening Report (Version II)* in June 2018. This concluded: *it is considered that the Plan should not have a significant effect on the environment and any proposal subsequently coming forward is not likely to result in significant effects however the formal requirements of the SEA Directive have not been met including the consideration of alternatives. This is due to the Plan's scheduled progression ahead of that of the Local Plan and therefore any reliance on the Local Plan's Sustainability Appraisal not being applicable until the Local Plan is found sound.*
16. On behalf of the Parish Council, AECOM prepared the *Debenham Neighbourhood Plan SEA Environmental Report* in June 2018.
17. SEA decisions must inform the preparation of the Plan at all stages. For Debenham, a major consideration in the production of the Plan is to ensure that housing delivered in the parish is appropriately located for local needs. The SEA Report states: *based on Debenham Parish Council's discussion with the District Council, a final target of up to 264 homes has been included with the Neighbourhood Plan, including an allowance for 54 homes to come forward through windfall development. This brings the total number of homes to be delivered within the DNP area over the Neighbourhood Plan period to up to 318 homes.*
18. Stages B and C of the preparation of a SEA require the consideration of reasonable alternatives and the likely significant effects on the environment of implementing the policies in the Plan. Article 5(1) of the SEA Directive provide that an SEA report should identify, describe and evaluate *the likely significant effects on the environment of implementing the plan or*

programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

19. A Local Plan call for sites was undertaken through a Public Sites Submission in 2017 which identified seven possible housing sites. The sites were then considered by the Neighbourhood Plan Steering Group as potential locations for housing allocations. AECOM was commissioned to undertake an independent and objective site assessment of the seven sites. To support the consideration of the suitability of these sites, the SEA process also undertook an appraisal of the key environmental constraints present at each of the sites and potential effects that may arise as a result of housing development at these locations.
20. The SEA process has assessed the policies and alternative sites under the following SEA themes: climate change, landscape and historic environment, land, soil and water resources, population and community, health and wellbeing and transportation. It provides a colour scoring for each of these themes. For the policies it identifies positive effects under all themes apart from land, soil and water resources, where it concludes the housing allocations proposed will lead to a loss of productive agricultural land. However the significance of these negative effects on soils resources is uncertain given that recent detailed agricultural land classification has not been undertaken in the Plan area.
21. The SEA provides a satisfactory explanation of housing site selection. In particular, it explains that the sites selected were in response to: *the requirement for Debenham's Neighbourhood Plan to conform to National Planning Guidance and the emerging policies in MSDC 's emerging Joint Local Plan; MSDC's desktop analysis of the Debenham sites; the findings of the independent and objective site assessment undertaken for the Neighbourhood Plan; the findings of the SEA process; and the views, concerns and aspirations of local residents as expressed in their feedback during consultation undertaken for the Neighbourhood Plan. This in particular related to residents' aspirations for new development to retain and add to the character of the village, and concerns relating to inadequate infrastructure, flooding and traffic bottlenecks.* I consider this satisfactorily details potential effects and relative merits of options and describes a transparent process of site selection following public consultation.
22. I am satisfied that the SEA has been undertaken in accordance with the requirements of European Directive 2001/42/EC. It has identified, described and evaluated the likely significant effects on the environment of reasonable alternatives taking into account the objectives and geographical scope of the Plan.
23. As regards Habitat Regulation Assessment (HRA), Essex Place Services produced the *Debenham Neighbourhood Plan 2016 - 2036 Pre-Submission Draft Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment (HRA): Screening Report* in January 2018. There were two

European sites to be considered to be within scope for this assessment – Deben Estuary SPA and Deben Estuary Ramsar site.

24. For each of the housing allocations, the Report concludes they would require project level HRA's and secure mitigation measures to avoid likely significant effect. The report concludes: *subject to Natural England's review, this HRA screening report indicates that the Debenham draft Neighbourhood Plan is predicted to have likely significant effects on a European site. The requirement for the Plan to undertake further assessment under the Habitats Regulations 2017 is therefore **screened in** and project level HRA must ensure that only options that can demonstrate no adverse effects on the SPA/SAC/Ramsar site can be given approval. Consequently, the policy needs to be amended to include "Applications for development of the allocated sites will need to be subject to an HRA screening. Any development which would result in significant adverse effects which could not be appropriately mitigated will not be permitted."*
25. Following consultation with the statutory consultees, Natural England advised that their SSSI Impact Risk Zones do not identify any risks to the Deben Estuary SPA/Ramsar from this distance (20km) from the international site. They therefore advised that the Debenham Neighbourhood Plan can be screened out from further considerations under the Habitats Regulations and no policy amendments to the Neighbourhood Plan are required in this respect. They agreed that no "in combination effects" are likely to arise from other plans or projects.
26. MSDC prepared a *Debenham Neighbourhood Plan Habitat Regulations Screening Determination* in March 2018. It concluded: *In the light of the Screening Report for Consultation prepared by Essex Place Services and the responses of the statutory consultees it is considered that there is unlikely to be a significant adverse effect on the Deben Estuary SPA/Ramsar site from development in Debenham which is 20km upstream. It is therefore determined that the Debenham Neighbourhood Plan does not require a Habitat Regulations Assessment.*
27. Essex Place Services prepared the *Debenham Neighbourhood Plan 2016 - 2036 Pre-Submission Draft Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment (HRA): Screening Report (Version II)* in June 2018. It concludes: *subject to Natural England's review, this HRA screening report indicates that the Debenham draft Neighbourhood Plan is not predicted to have any likely significant effects on a European site. The requirement for the Plan to undertake further assessment under the Habitats Regulations 2017 is therefore **screened out**.*
28. On this basis and based on the screening determination and consultee response, I consider that the Plan does not require a full HRA under Articles 6 or 7 of the Habitats Directive.

29. A Neighbourhood Plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. I am satisfied that the Plan is compatible with EU obligations and does not breach the European Convention on Human Rights obligations.

Policy Background

30. The revised *National Planning Policy Framework* has recently been published on 24 July 2018. At paragraph 214 it states: *The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019.*
31. The revised *National Planning Policy Framework* incorporates policy proposals previously consulted on in the Housing White Paper and the Planning for the Right Homes in the Right Places consultation, as well as changes to planning policy implemented through Written Ministerial Statements since the *National Planning Policy Framework* was published in 2012.
32. In accordance with paragraph 214 in the revised *National Planning Policy Framework*, I have examined this Plan against the previous *National Planning Policy Framework* (2012) (NPPF). Where I refer to the NPPF, it is to the 2012 version. This sets out the Government's planning policies for England and how these are expected to be applied.
33. The *Planning Practice Guidance* (2014) (PPG) provides Government guidance on planning policy. Similarly, I have examined the Plan against PPG guidance and any Written Ministerial Statements that related to the 2012 Framework. The PPG is currently being revised in accordance with the revised NPPF. I have referred to paragraphs in the PPG that may be in the process of being archived as part of this revision, as it is necessary in this transition period to refer to PPG related to the 2012 NPPF.
34. Paragraph 7 in the NPPF identifies the three dimensions to sustainable development:
There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:
- **an economic role** – *contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*
 - **a social role** – *supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its*

health, social and cultural well-being; and

•an environmental role – *contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

35. Debenham Parish is within the local authority area of Mid Suffolk District Council (MSDC). The development plan for the Debenham Neighbourhood Plan Area comprises the saved policies in the Mid Suffolk Local Plan (1998); The Mid Suffolk Local Plan First Alteration: Affordable Housing (2006); The Mid Suffolk Core Strategy Development Plan Document (2008); and The Mid Suffolk Core Strategy Focused Review (2012).
36. The strategic policies in the development plan include policies regarding housing provision and the conservation and enhancement of the natural and historic environment.
37. MSDC with Babergh District Council published a new Joint Local Plan Consultation Document in August 2017. This covers the period to 2036. It identifies three potential sites for housing development at Debenham. Views have been sought on the suitability of sites. The emerging Joint Local Plan Consultation Document states that many of the sites presented will not be needed to meet the development requirements of the District and not all will be taken forward in the Plan into allocations. In addition, it states that there is opportunity for local communities to bring forward sites for development in neighbourhood plans in parallel with the developing local plan process and in accordance with the emerging level of growth agreed with the two District Councils and opportunity to share evidence.
38. There is no legal requirement to test the Neighbourhood Plan against emerging policy although PPG advises that the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which the neighbourhood development plan is tested.
39. The qualifying body and the local planning authority should aim to agree the relationship between policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted development plan, with appropriate regard to national policy and guidance. Whilst there is no requirement for the Neighbourhood Plan to conform to emerging policies, it has been produced in parallel with the production of the emerging Local Plan and in close cooperation with MSDC.

The Neighbourhood Plan Preparation

40. I am required under The Localism Act 2011 to check the consultation process that has led to the production of the Plan. The requirements are set

out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.

41. The initial plan preparation process started in 2013. It is clear that local people were kept informed of the process of the production of the Plan. In particular, the consultation process included drop in and presentation sessions with a leaflet drop to households, three online surveys involving residents, youths and businesses and a Housing Needs Survey.
42. The consultation period on the pre-submission draft of the Plan ran from 1 February 2018 to 16 March 2018. Publicity included emails to a comprehensive list of consultees, a dedicated website, posters advertising the consultation and leaflets to households. Copies of the Plan were available in hard copy at public premises in the village. Two presentation days/evenings were arranged to inform and receive feedback on the Plan. Local schools were involved, social media platforms used and press releases issued.
43. The Consultation Statement does not include a list of people consulted on the pre-submission draft Plan. Regulation 15 (2) requires the Consultation Statement to contain details of the persons and bodies who were consulted about the proposed neighbourhood plan. At my request, MSDC has subsequently published the list on the Council's web site for this Plan. I do not consider anyone has been prejudiced by this omission from the Consultation Statement. As such, I am satisfied that the pre-submission consultation and publicity has met the requirements in The Neighbourhood Planning (General) Regulations 2012.
44. The consultation and publicity went well beyond the requirements and it is clear that the qualifying body went to considerable lengths to ensure that local residents, local youths and businesses were able to engage in the production of the Plan. I congratulate them on their considerable efforts.
45. MSDC publicised the submission Plan for comment during the publicity period between 2 July 2018 and 24 August 2018 in line with Regulation 16 in The Neighbourhood Planning (General) Regulations 2012. A total eight responses were received. I am satisfied that all these responses can be assessed without the need for a public hearing. I gave the Parish Council the opportunity to comment on the Regulation 16 representations. I have taken their comments into consideration. Their comments have been placed on the MSDC web site.
46. Some responses suggest additions and amendments to policies. My remit is to determine whether the Plan meets the Basic Conditions. Where I find that policies do meet the Basic Conditions, it is not necessary for me to consider if further suggested additions or amendments are required. Whilst I have not made reference to all the responses in my report, I have taken them into consideration.

The Debenham Neighbourhood Plan

Background To The Neighbourhood Plan

47. Background information in the first eight Sections of the Plan provides an overview of the Plan area, including its landscape, population, heritage and housing. As such, this provides a clear background to the Plan.
48. It is necessary for Neighbourhood Plans to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency as stated in the core planning principles in paragraph 17 in the NPPF. I do refer to clarity and precision with regard to some recommendations to modifications to the Plan. Where I do so, I have in mind the need to provide a practical framework in accordance with the core principles in the NPPF, thus ensuring that the Plan has regard to national policy in this respect.
49. It is not for me to re-write the Plan. Where I have found editing errors, I have identified them **as minor editing matters** and highlighted these as such. These have no bearing on whether the Plan meets the Basic Conditions. **I see the following four paragraphs as minor editing matters.**
50. Map 2 on Page 15 needs a key. Paragraph 4.2 needs to be updated with regard to the programme for the emerging Joint Local Plan. The first sentence in paragraph 4.4 should refer to a neighbourhood plan having to be in general conformity with strategic policy. Paragraph 4.9 will need to be amended. MSDC in its Regulation 14 consultation response pointed out that paragraph 4.9 should refer to the current annual requirement for new homes in the Core Strategy Focused Review as a requirement of 430 dwellings, not 256 dwellings. Therefore, the last two sentences in paragraph 4.9 are incorrect.
51. The first bullet point in paragraph 4.20 is incorrect. It should refer to the neighbourhood plan having to have regard to national policy, rather than conform with it and the neighbourhood plan is not required to conform with emerging policy, although emerging policy can be taken into consideration.
52. Paragraph 6.13 requires the Conservation Area Appraisal to be incorporated into the Local Plan. It is not for a neighbourhood plan to require any inclusion of matters in a Local Plan. Therefore, this reference should be deleted.
53. Paragraph 7.3 refers to the sequential approach to directing development to areas of lowest flood risk. However, it should refer to such tests being applied prior to a Flood Risk Assessment, in accordance with the approach in the NPPF.
54. Map 8 in Section 8 identifies visually important open space. There is no subsequent policy regarding such open space, I have no robust evidence supporting these designations and the sites do not correspond to the Local

Green Space designations in Policy DEB 18. As such, in the interest of precision, I recommend the deletion of Map 8 and associated text in Section 8. This has regard to national policy.

55. **Recommendation, to meet the Basic Conditions, I recommend the deletion of Map 8 and reference to visually important open spaces in paragraph 8.1.**

Vision

56. A clear Vision for the Parish has been established: *Debenham will strive to celebrate its proud heritage, develop a vibrant economy, and support a thriving community. Our community will endeavour to ensure that it remains at ease with itself.*
57. The vision is supported by five main objectives, and for each objective there is an aim and policies to achieve the objectives.

Affordable Homes

58. The *Debenham Housing Needs Survey Report* (November 2014) recommended, following a survey of residents, that an additional 16 affordable houses are needed in the Parish.
59. There is not a policy in the Plan with regard to the provision of affordable homes. However, the Affordable Homes section on pages 45-47 includes a number of policy requirements, which are not substantiated in policy elsewhere. To provide a practical framework for decision making, I recommend that the first eight paragraphs of this section are deleted.
60. **Recommendation: to meet the Basic Conditions I recommend the deletion of the first eight paragraphs of the Affordable Homes section on pages 45-47.**

Policies

61. PPG states: *A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.* (Paragraph: 041 Reference ID: 41-041-20140306).

62. For ease of reference, I have used the same policy titles as those in the Plan. I have briefly explained national policy and summarised main strategic policies where relevant to each neighbourhood plan policy. I have tried not to repeat myself. Where I have not specifically referred to other relevant strategic policy, I have considered all strategic policy in my examination of the Plan.
63. Policies in a neighbourhood plan can only be for the development and use of land. Where there are community aspirations (identified as community actions in this Plan), these have to be clearly differentiated from policies for the development and use of land.

DEB 1 (Policy 1 - Growth)

64. There is not an up-to-date strategic policy against which to assess overall housing figures. Debenham is identified as one of ten Key Service Centres in the existing Core Strategy. Policy FC 2 in the existing Core Strategy Focused Review seeks to deliver 750 additional dwellings in total in these Key Service Centres over a 15 year period from April 2012.
65. The district-wide housing provision is currently being considered as part of the emerging Joint Local Plan. The emerging Joint Local Plan Consultation Document sets the housing requirement for the whole District as 9,951 dwellings for the period 2014 - 2036. For Core Villages, including Debenham, the Joint Local Plan has suggested options for growth ranging from a requirement of between 15 - 30% of the total District requirement. This has not been further broken down to a percentage for each Core Village.
66. The Neighbourhood Plan Examination process does not require a rigorous examination of district wide housing land requirements. This is the role of the examination of the emerging Joint Local Plan.
67. In the absence of up to date adopted strategic housing policies, it is not my role to determine whether the Neighbourhood Plan would be inconsistent with the adopted version of the emerging Joint Local Plan.
68. Paragraph 4.12 in this Neighbourhood Plan, with regard to the options for the distribution of future development in the Joint Local Plan, states *without a preferred option being chosen at this time, it is not possible to identify a specific amount of growth for Debenham based on the Local Plan options. However, a proportional distribution of this growth to the Core Villages, based on current population, would result in a requirement of between 84 and 167 homes in Debenham between 2014 and 2036.* However, the emerging Joint Local Plan does not indicate a proportional distribution of the growth to Core Villages, so I consider that there is considerable uncertainty with regard to this requirement for this range of 84-164 new dwellings.

69. The Neighbourhood Plan has sought to provide for sustainable growth by allocating three sites and a windfall allowance to provide up to 316 dwellings in the Plan period.
70. The figure of up to 316 new dwellings has been derived following working closely with MSDC. MSDC has stated as part of their comments at the Regulation 14 consultation stage that it is not possible to provide certainty on the likely housing requirement for Debenham and a figure higher than that currently provided for in the Neighbourhood Plan cannot be ruled out. On this basis, I have concern with the wording of Policy DEB 1 where it restricts future development up to 316 dwellings. In addition, I do not consider it correct to state in the evidence supporting Policy DEB 5 that the sites allocated in DEB 3 and DEB 4 allows Debenham to meet its proportionate share of MSDC current housing requirement, due to it being such an early stage in the emerging Joint Local Plan process.
71. National policy emphasises that development means growth. I see no robust and credible evidence base to justify the upper restriction in Policy DEB 1 of up to 316 dwellings. In particular, I see no robust evidence to restrict the number of windfall sites. Therefore, I recommend that the number of windfall sites is expressed as an estimation. As it is clear under Policies DEB 3, DEB 4 and DEB 5 that the number of dwellings likely to be built on the allocated sites must be subject to a detailed assessment, I do not consider the restrictive cap of a total of 316 dwellings would constitute sustainable development.
72. I have thought long and hard about the implications of Policy DEB 1. In the absence of detailed layouts for the three allocated sites, there is a wide range of possible numbers of dwellings that could be delivered on these sites in a sustainable way. Therefore, I recommend that Policy DEB 1 emphasises that the total of 316 dwellings is an estimate.
73. Policies DEB 3, DEB 4 and DEB 5 refer to the number of homes to be built on the allocated sites being subject to detailed site assessments based on the policies in this Plan, and policies in the MSDC emerging Joint Local Plan. The policies in the emerging Joint Local Plan will accord more weight as the Local Plan process evolves. In the interest of precision, I suggest this reference is modified to refer to detailed site assessments being based on the relevant policies in the development plan.
74. As the actual number of homes to be built on the allocated sites will be subject to detailed site assessments, in the interest of precision, I recommend that the number of dwellings proposed on each allocated site in Policy DEB 1 is expressed as an estimate of the ranges specified in Policies DEB 3, DEB 4 and DEB 5 and reference is made in Policy DEB 1 to the detailed site assessments being based on the relevant policies in the development plan. This way, should more dwellings be required through the emerging Joint Local Plan and/or it is feasible to provide these on the allocated sites in a sustainable way, this policy does not prevent such

sustainable development. I have suggested alternative wording. Subject to these suggested modifications, from the evidence before me, I consider the indicative estimated housing figure provides me with the best guidance on total housing numbers for the Plan area to ensure sustainable development.

75. It is not for me to re write the Plan and my suggested modifications may require editing elsewhere, particularly in Section 4 and the evidence supporting Policy DEB 5. **I see this as a minor editing matter.**
76. Policy DEB 1 requires sites DEB 3 and DEB 4 to be developed prior to any development on site DEB 5. The Plan explains the reason for this includes meeting the requirements in the emerging Joint Local Plan and to spread development across a number of sites.
77. It is unclear in the wording of Policy DEB 1 whether Site DEB 5, Land east of Aspoll Road, has been allocated as a current or reserve site. Policy DEB 1 includes it in the 316 dwelling allowance yet Policy DEB 5 implies that it might not be developed at all.
78. There is no automatic or definite direct relationship between proposals being supported, planning permissions being granted, and completion of dwellings. The housing market will normally be the strongest determinant of build-out rates. There is no clear policy mechanism to implement the phasing element of Policies DEB 1 and DEB 5 and therefore they could not be used to shape and direct development. At the heart of the NPPF is a presumption in favour of sustainable development. All plans should be based upon and reflect this presumption. Neighbourhood plans should plan positively to support local development. The introduction of an anticipated delivery trajectory, represents an inappropriate constrained approach to sustainable development.
79. In the circumstances of this Plan, where there is no clear strategic housing requirement, I have no robust evidence before me to justify the phasing of development proposed. The wording of Policy DEB 1 and DEB 5 with regard to phasing is in conflict with the presumption in favour of sustainable development established in the NPPF. Thus, I recommend deletion of reference to phasing in Policy DEB 1. I will refer to this again under Policy DEB 5.
80. As a consequence of my suggested modification regarding phasing, paragraphs 4.17 - 4.19 will need revising. **I see this as a minor editing matter.**
81. The last two paragraphs of Policy DEB 1 are explanatory text, rather than land use and development policy. To provide a practical framework for decision making, I recommend the deletion of these paragraphs from Policy DEB 1. These paragraphs, excluding the last sentence regarding phasing, can be included in the explanatory text. Whether they are included as explanatory text **is a minor editing matter.**

82. Policy DEB 1 refers to a Proposals Map. This has been provided by the Parish Council after the Regulation 16 consultation period. I have asked for it to be placed on the MSDC web site. I do not consider anyone has been prejudiced by this late submission. In the interest of precision, I recommend that the Proposals Map is incorporated into the Plan.
83. The NPPF in paragraph 185 is clear that outside the strategic elements *neighbourhood plans will be able to shape and direct sustainable development in their area.*
84. The criteria for site selection was based on a traffic light rating by independent consultants. There has been criticism of the site selection process from the promoters of one of the sites: Land west of Priory Lane. Access has been identified as a constraint in the Site Assessment Report (December 2017) undertaken by AECOM as part of the site selection process. Sanctuary Housing has disputed these findings and has stated that that access through their neighbouring development at Coopersfield is possible.
85. Boyer Planning on behalf of Taylor Wimpey UK Ltd is promoting the development of two of the seven possible housing sites. At the time of writing my report, there is an outline planning application awaiting determination for up to 295 dwellings including a potential primary school or community/ care use on the site north of Gracechurch Street (Ref DC/17/06293). The other site being promoted is to the north of Low Road.
86. Boyer Planning on behalf of Taylor Wimpey UK Ltd has criticised the site selection process, in particular they have raised concern regarding viability. The *Site Assessment Report* (December 2017) undertaken by AECOM considered the suitability of seven identified sites and their availability. It did not consider viability and advised that the site promoters/developers could be approached to provide viability evidence. However, based on the evidence presented, it was able to make recommendations for site selection of sites in the green and amber categories. Whilst it is unfortunate that further assessment of some of the sites was not undertaken, any assessment of land availability in the production of neighbourhood plans needs to be proportionate.
87. Core Strategy Policy CS2 seeks to restrict development in the countryside other than in defined categories. The proposed housing sites will be situated in the countryside, adjacent to the settlement boundary. National policy emphasises that development means growth and it is inevitable that the level of growth proposed in the neighbourhood plan requires the development of sites within the countryside adjacent to the settlement boundary. The Plan recognises the status of Debenham as a Core Village in addressing housing need in relation to anticipated levels of growth in the emerging Joint Local Plan. I consider the approach to development in the countryside adjacent to the settlement boundary to be in general conformity with strategic policy.

88. Concern has been raised regarding necessary education provision resulting from the proposed level of housing development on the allocated sites.
89. MSDC has a Community Infrastructure Levy (CIL) charging scheme. It is required by Regulation 123(2) to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. The current list includes, amongst other facilities, the funding of education provision.
90. Suffolk County Council has stated in its representations at the Regulation 16 Consultation Stage that it recommends the allocation of a site for early years provision. Whilst there is no such allocation in the Plan, the County Council does state that, as an alternative, additional capacity could be provided alongside potential expansion of the primary school. As regards Secondary education, the County Council states that the existing school has the ability to cope with the growth proposed.
91. From these representations, I am satisfied, as reasonably as I can be expected to be, that the proposed housing sites would deliver the means for the necessary education provision arising from the scale of development anticipated.
92. Whilst the site selection process has been criticised, the chosen sites received local support during a transparent and robust consultation process. From the *Site Assessment Report* (December 2017) and the *Debenham Neighbourhood Plan SEA Environmental Report* in June 2018, I am satisfied that the chosen sites are deliverable, as much as I can reasonably be expected to be, and together with the overall housing strategy in the Plan will contribute towards the achievement of sustainable development by the provision of sustainable growth. In particular, I am satisfied, as far as I can reasonably be expected to be, that suitable vehicular access to the sites is obtainable and that there are no insurmountable restrictions on development.
93. Subject to my comments with regard to the details of the site-specific allocations below, I consider that the allocated housing sites meet the Basic Conditions. Thus, I do not consider it necessary for the inclusion of additional, or alternative, sites.
94. For the reasons stated above, Policy DEB 1, as modified, has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Modified Policy DEB 1 meets the Basic Conditions.
95. **Recommendation: to meet the Basic Conditions, I recommend**
- 1) incorporation of the Proposals Map into the Plan;**
- 2) modification to Policy DEB 1 to read as follows:**
- DEB 1 (Policy 1 - Growth)**

It is estimated that this Plan can provide around 316 dwellings to be developed in Debenham between 2016 and 2036. The actual number of homes to be built will be subject to detailed site assessments of the allocated sites based on the relevant policies in the development plan. This growth will be met through the allocation of the following sites:

1. Land north of Ipswich Road (DEB 3) providing an estimated 60 – 140 dwellings;

2. Land south of Low Road (DEB 4) providing an estimated 15 – 35 dwellings;

3. Land east of Aspoll Road (DEB 5) providing an estimated 37 – 87 dwellings;

and an anticipated windfall allowance of approximately 54.

DEB 2 (Policy 2 - Appropriate Housing)

96. The NPPF seeks high quality design. Paragraph 58 in the NPPF refers to the need for policies in neighbourhood plans to: *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation.*
97. Core Strategy Policy CS5 seeks to ensure that all development maintains and enhances the environment and retains the local distinctiveness of the area.
98. Policy DEB 2 sets criteria for appropriate housing. Whilst most of these would contribute towards achieving high quality design, I am concerned about criterion c).
99. The allocated sites would all provide 15 or more dwellings on each site. Therefore, I see no justification for the preference for housing schemes of up to 15 dwellings. As this creates internal conflict within the Plan, I recommend the deletion of this reference in criterion c).
100. Paragraph 173 in the NPPF states: *Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened.*
101. Developer contributions can only be sought where they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. These tests are set out as statutory tests in the *Community Infrastructure Levy Regulations 2010.*
102. The requirement in criterion c) for contributions from larger housing schemes over and above those required as necessary to make the development

acceptable in planning terms does not have regard to national policy outlined above. Therefore, I recommend deletion of this reference.

103. I have visited the Parish and seen for myself that an overriding characteristic of the area is for dwellings to be no more than two storeys. Thus, I am satisfied that there is justification for such a restriction on new dwellings.
104. Subject to the deletion of criterion c), Policy DEB 2 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Modified Policy DEB 2 meets the Basic Conditions.
105. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy DEB 2 by the deletion of criterion c).**

Flooding

106. Prior to looking at the site specific policies in detail, I consider it appropriate to address the issue of flooding.
107. The NPPF seeks to ensure that new development is safe in areas at risk of flooding and does not increase the risk of flooding elsewhere. In areas at risk of flooding, paragraph 102 in the NPPF requires both the Sequential Test and Exception Test (where applicable) to be passed for development sites to be allocated in a plan.
108. Concern has been raised regarding flooding. Suffolk County Council together with the Environment Agency has suggested additional flooding explanatory text and policy because of the complex flood issues in Debenham. My role is only to determine if the Plan meets the Basic Conditions and other legal requirements. The policy suggested would have met the Basic Conditions with regard to national policy and flooding, if it were already in the Plan. However, in the absence of such a neighbourhood plan policy, flooding issues would be dealt with at the planning application stage under national policy. Therefore, I cannot require the proposed policy to be included in the Plan for the Plan to meet the Basic Conditions.
109. The Parish Council has stated that it would accept inclusion of the suggested flooding explanatory text into the Plan. As such, **I see this as a minor editing matter for the Parish Council to include if it wishes.**
110. Whilst concern has been raised regarding flooding, neither the County Council nor Environment Agency has commented that the Flood Zone 3 along the edge of Low Road would prevent the development of the site north of Ipswich Road and the site south of Low Road (DEB 3 and DEB 4). The SEA Environmental Report (June 2018) states that the area of flood risk does not affect a significant part of the site itself. Access would not be through the Flood Zone 3. I have referred to this matter under Policy DEB 4.

111. Whilst concern has been raised regarding flooding at the point of access for the site east of Aspall Road (DEB 5), neither the County Council nor Environment Agency has commented that this would prevent the development of this site. The *Site Assessment Report* (December 2017) identifies that the access is within Flood Zones 2 and 3 and that this would require mitigation/drainage, although the site itself is outside these flood zones. The *SEA Environmental Report* (June 2018) states that the area of flood risk does not affect a significant part of the site itself.
112. As access would be across Flood Zones 2 and 3, I sought clarification from MSDC as to whether a sequential test had been carried out in respect of the allocation of this site. MSDC sought clarification from the Environment Agency. The correspondence in an email dated 3 October 2018 has been placed on the MSDC web site.
113. The Environment Agency advised that the decision on whether the site should be the subject of a sequential test is a matter for the local planning authority. MSDC has stated in the correspondence: *it is acknowledged that part of Aspall Road, particularly the western side of the road, is within Flood Zones 2 and 3. The Environment Agency has advised that the implications of this can be dealt with through a flood risk assessment at the planning application stage. For these reasons it is the local planning authority's view that a sequential test report in relation to site DEB 5 is not required.*
114. From the correspondence referred to above, I am satisfied that the allocation of land at Aspall Road, does not require a sequential test and that flooding matters can be dealt with at the planning application stage. I will refer to this under Policy DEB 5.

DEB 3 (Policy 3: Allocation of site north of Ipswich Road for development.)

115. I have visited the Plan area and seen for myself the locations of the allocated sites. I have already referred to the site selection process under Policy DEB 1 above. Therefore, I am concentrating on the policy detail under each of the site allocations.
116. For all three site allocations, I suggest modification to refer to an estimated number of dwellings, for the reasons stated under Policy DEB 1 above.
117. As there is now a Proposals Map, I suggest that Policy DEB 3 refers to the Proposals Map, rather than Map 4. Whilst I have suggested revised wording in this respect, **I see this as a minor editing matter.**
118. The County Council has stated that this site is in an area of potential archaeological finds and recommends that explanatory text states that early evaluation would be advisable and best practice. The Parish Council in its response to representations has accepted all the suggested

recommendations by the County Council. On this basis, such an addition to the explanatory text is acceptable. **I see this as a minor editing matter.**

119. I am satisfied, as far as I can reasonably be expected to be, that this site is deliverable and will contribute towards sustainable development. Subject to the modification I have suggested regarding an estimation of housing numbers, Policy DEB 3 meets the Basic Conditions.

120. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy DEB 3 to read as follows:**

DEB 3 (Policy 3: Allocation of site north of Ipswich Road for development.)

a) 4 HA of agricultural land north of Ipswich Rd is allocated for development.

The site is shown as site DEB 3 on the Proposals Map. It has the potential to deliver an estimated 60-140 new homes. The actual number of homes to be built must be subject to a detailed site assessment based on the relevant policies in the development plan. Development of the site must provide vehicular, cycle and pedestrian access through the site to its boundary with the site south of Low Road which is the subject of Policy DEB 4.

DEB 4 (Policy 4: Allocation of site south of Low Road for development.)

121. As there is now a Proposals Map, I suggest that Policy DEB 4 refers to the Proposals Map, rather than Map 4. Whilst I have suggested revised wording in this respect, **I see this as a minor editing matter.**

122. The *Site Assessment Report* (2017) identified the restriction on vehicular access to that being via the adjacent site north of Ipswich Road due to access restrictions onto Low Road. This justifies the approach in Policy DEB 4 to requiring vehicular access via Ipswich Road.

123. Suffolk County Council has suggested that development of the site should take account of the site containing an area of Flood Zone 3 along the edge of Low Road. It is not proposed to access the site via Low Road. However, any development will have to be designed to take into consideration the flood zone to have regard to national flooding policy. Therefore, I have suggested an addition to Policy DEB 4 in this regard.

124. Paragraph 128 in the NPPF requires developers to submit appropriate desk based assessments, and where necessary, field evaluations of sites with archaeological interest.

125. Suffolk County Council has stated that the site lies within an area of high topographic potential for archaeological remains. As such, the County

Council recommends the addition of reference to the need for archaeological evaluation in Policy DEB 4. I consider such an addition would have regard to national policy.

126. Subject to the modifications I have recommended above, Policy DEB 4 meets the Basic Conditions. I am satisfied, as far as I can reasonably be expected to be, that this site is deliverable and will contribute towards sustainable development.

127. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy DEB 4 to read as follows:**

DEB 4 (Policy 4: Allocation of site south of Low Road for development.)

a) 1 HA of agricultural land south of Low Road is allocated for development.

The site is shown as site DEB 4 on the Proposals Map. It has the potential to deliver an estimated 15-35 new homes. The actual number of homes to be built must be subject to a detailed site assessment based on the relevant policies in the development plan.

Development of the site must be subject to no vehicular access onto Low Road, with vehicular access provided onto Ipswich Road, via the development of the site specified in Policy DEB 3.

Development of the site must link pedestrian and cycle access from the site specified in Policy DEB 3 through to pedestrian and cycle access onto Low Road.

Any planning application must be supported by a flood risk assessment taking account of the area of Flood Zone 3 along the boundary with Low Road.

Any planning application must be supported by the results of a programme of archaeological evaluation, including field evaluations where necessary and should demonstrate any impacts of development on archaeological remains and proposals for managing such impacts.

DEB 5 (Policy 5: Allocation of site east of Aspall Road opposite Primary School.)

128. As mentioned under Policy DEB 1, I see no justification for the phasing restriction on developing this site. Therefore, I recommend deletion to reference to the prior development of sites DEB 3 and DEB 4. I have suggested revised wording that incorporates reference to the site on the Proposals Map and an estimation of housing numbers.

Following my suggested modifications, the evidence in Section 4 and on page 51 supporting this policy will need revision. **I see this as a minor editing matter.**

129. Concern has been raised regarding access to the site. However, Suffolk County Council has made substantial representations on the Plan and as highway authority has not indicated an insurmountable problem with access.
130. I have suggested an addition to Policy DEB 5 to take into account the Flood Zones 2 and 3 along Aspoll Road, as referred to above in the section on flooding.
131. Suffolk County Council has stated that the site lies within an area that is topographically favourable for archaeological remains. As such, the County Council recommends the addition of reference to the need for archaeological evaluation in Policy DEB 5. I consider such an addition would have regard to national policy.
132. Subject to the proposed modifications above, Policy DEB 5 meets the Basic Conditions. I am satisfied, as far as I can reasonably be expected to be, that this site is deliverable and will contribute towards sustainable development.
133. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy DEB 5 to read as follows:**

DEB 5 (Policy 5: Allocation of site east of Aspoll Road opposite Primary School.)

2.5 HA of agricultural land east of Aspoll Road is allocated for development. The site is shown as site DEB 5 on the Proposals Map. This site has the potential to deliver an estimated 37-87 new homes. The actual number of homes to be built must be subject to a detailed site assessment based on the relevant policies in the development plan.

Any planning application must be supported by a flood risk assessment taking account of access onto Aspoll Road within Flood Zones 2 and 3.

Any planning application must be supported by the results of a programme of archaeological evaluation, including field evaluations where necessary and should demonstrate any impacts of development on archaeological remains and proposals for managing such impacts.

DEB 6 (Policy 6 - Consultation with the Parish Council)

134. Policy DEB 6 requires developers of major developments to actively engage with the Parish Council and community and produce a development brief at the pre-application stage. The justification for the policy is to ensure the

community is able to shape and influence development in the locality. There is no doubt that such involvement is desirable. However, paragraph 189 in the NPPF clearly indicates that local planning authorities cannot require that a developer engages with them at the pre-application stage and can only encourage developers to engage with the local community before submitting their applications. It is therefore evident to me that this policy does not comply with the basic conditions because of this clear conflict with the NPPF.

135. I have no reason to suppose that it is the government's intention that the procedural requirements on developers for planning applications should be more onerous where neighbourhood plans are in existence than elsewhere. There would therefore need to be a special justification for a policy imposing these requirements to relate to all major applications and none has been presented to me.
136. For the above reasons, I recommend the deletion of Policy DEB 6.
137. **Recommendation: to meet the Basic Conditions, I recommend the deletion of Policy DEB 6 and explanatory text below the policy.**

DEB 7 (Policy 7 - Sustainability)

138. Core Strategy Policy CS3 seeks sustainable construction techniques to reduce contributions to climate change.
139. In a Written Ministerial Statement of 25 March 2015, the Government announced that it is not now appropriate to refer to any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings in neighbourhood plans. As such, Policy DEB 7 does not have regard to national policy. Therefore, to meet the Basic Conditions, I recommend the deletion of Policy DEB 7 and explanatory paragraphs, including the paragraph at the end of page 43.
140. The revised NPPF is now the Government's statement of national planning policy, and most pre-existing Written Ministerial Statements should be disregarded. However, under the transitional arrangements set out within paragraph 214 in the revised NPPF, the policies in the previous Framework will apply where the plan is submitted for examination on or before 24 January 2019. Therefore, it is necessary for me to have regard to the pre-existing Written Ministerial Statement.
141. **Recommendation: to meet the Basic Conditions, I recommend the deletion of Policy DEB 7, explanatory text below the policy. and the paragraph at the end of page 43.**

DEB 8 (Policy 8 - Housing Mix)

142. The NPPF at paragraph 50 emphasises the need to deliver a wide choice of high quality homes. Local planning authorities should, amongst other matters, plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.
143. Core Strategy Policy CS9 seeks to ensure a mix of housing types, sizes and affordability to cater for different accommodation needs.
144. Policy DEB 8 seeks a housing mix to contribute towards existing and future needs of the village. It is clear from the local community background evidence that there is a need for small properties and this is reflected in the policy.
145. Policy DEB 8 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Policy DEB 8 meets the Basic Conditions.

DEB 9 (Policy 9 – Residential Car Parking)

146. The NPPF seeks to ensure safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians.
147. The NPPF at paragraph 39 states: *If setting local parking standards for residential and non-residential development, local planning authorities should take into account:*
- the accessibility of the development;*
- the type, mix and use of development;*
- the availability of and opportunities for public transport;*
- local car ownership levels; and*
- an overall need to reduce the use of high emission vehicles”.*
148. A Government Written Ministerial Statement of 25 March 2015 announced that the following text now needs to be read alongside paragraph 39: *Local Planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.*
149. Saved Local Plan Policies T9 and T10 seek to ensure the provision of adequate space for the parking on site. However, I do not consider these to be strategic policies.

150. Suffolk County Council has stated that the level of parking required in criterion a) in Policy DEB 9 goes beyond guidance in the *Suffolk Guidance for Parking Technical Guidance (2015)*.
151. I understand the concerns of local residents with regard to road safety and parking and I have seen for myself the existing highway and parking situation. Nevertheless, in the absence of robust evidence, I see no clear and compelling justification for the local parking standards proposed. I have no evidence before me to clearly indicate that the requirements of paragraph 39 in the NPPF have been followed to reach the standards stated in Policy DEB 9. On this basis, criterion a) in Policy DEB 9 does not have regard to national policy and thus I recommend the deletion of this criterion.
152. Criteria b) and c) in Policy DEB 9 refer to the need to not reduce the existing level of off-street parking provision and to prevent front garden space from being used for parking in new developments. In the interest of highway safety and the interest of achieving high quality design, these criteria have regard to national policy and contribute towards the social and environmental roles of sustainable development.
153. Subject to the modification I have suggested above, Policy DEB 9 meets the Basic Conditions.
154. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy DEB 9 to read as follows:**
- DEB 9 (Policy 9 – Residential Car Parking)**
- a) Proposals that would reduce the existing level of off-street parking provision will be resisted unless it can be satisfactorily demonstrated that the amount of overall provision is adequate.**
- b) New developments should resist ‘front garden space’ being used to accommodate car parking spaces. Car parking spaces should be in addition to space for front gardens.**
- DEB 10 (Policy 10 – Lifetime Homes)**
155. As mentioned under Policy DEB 7, in a Written Ministerial Statement of 25 March 2015, the Government announced that it is not now appropriate to refer to any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings in neighbourhood plans. As such, Policy DEB 10 does not have regard to national policy. Therefore, to meet the Basic Conditions, I recommend the deletion of Policy DEB 10.
156. **Recommendation: to meet the Basic Conditions, I recommend the deletion of Policy DEB 10 and explanatory text below the policy.**

DEB 11 (Policy 11 - Traffic flows and non-residential car parking)

157. The NPPF seeks to promote sustainable transport and highlights in paragraph 35 that developments should create safe and secure layouts.
158. Core Strategy Policy CS6, amongst other matters, seeks to reduce the need to travel and make safer and easier access. In addition, this policy requires new development to provide or support the delivery of appropriate and accessible infrastructure to meet the justified needs of new development.
159. The first part of Policy DEB 11 seeks to ensure highway safety and requires an assessment of traffic generation for new development. I have visited the Parish and seen for myself the traffic situation and road layout.
160. The definition of development in planning policy encompasses a wide range, including change of use and there may be many instances where small scale development creates little or no additional traffic generation. Therefore, the information required regarding traffic impact should be proportionate to the scale of development proposed. In the interest of precision, I have suggested revised wording that puts the onus on development proposals which involve an increase in traffic generation having to ensure they do not create unacceptable highway dangers. In addition, as such information would be required at the planning application stage, in the interest of precision; I recommend modification to Policy DEB 11 to specify that this part of the policy refers to 'development proposals'.
161. The second part of Policy DEB 11 seeks contributions from new developments towards public car parking. Developer contributions can only be sought where they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. These tests are set out as statutory tests in the *Community Infrastructure Levy Regulations 2010*.
162. It is clear from the *Residents Survey* that parking is a concern to the local community, particularly around the schools. However, I have not been provided with detailed evidence to satisfy me that the proposed public parking meets the tests in the *Community Infrastructure Levy Regulations 2010*, with regard to planning obligations. This does not necessarily mean that the provision of public parking does not meet these tests; it is just that I do not have full information. Therefore, in order to ensure that the Plan meets the Basic Conditions, I recommend reference in Policy DEB 11 to the need for any requirement for developers to fund the provision of public parking to meet these tests.
163. Subject to the modifications I have suggested above, Policy DEB 11 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Modified Policy DEB 11 meets the Basic Conditions.

164. The principles reasons supporting Policies DEB 11 and DEB 12 refer to ensuring new housing stock provides opportunities to reduce existing traffic problems. Developers cannot be expected to reduce existing traffic problems, although they can be expected to ensure that they do not exacerbate such problems. Therefore, this reference should be deleted. **I see this as a minor editing matter.**

165. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy DEB 11 to read as follows:**

DEB 11 (Policy 11 - Traffic flows and non-residential car parking)

- a) **Development proposals which would involve an increase in traffic generation, will need to demonstrate that they do not give rise to unacceptable highway dangers.**
- b) **When proposals for development are considered, opportunities to provide public car parking near the primary school, high school, and leisure centre will be taken, subject to the statutory tests in the *Community Infrastructure Levy Regulations 2010*, and the delivery will be secured through the planning process.**

DEB 12 (Policy 12 – Non-motorised networks)

166. The NPPF seeks to give priority to pedestrian and cycle movements as part of promoting sustainable transport. Paragraph 75 in the NPPF seeks to protect and enhance public rights of way and access.

167. Whilst saved Local Plan Policy RT12 seeks to safeguard and improve the footpath and bridleway network, this is not a strategic policy.

168. Policy DEB 12 seeks to protect and enhance, where appropriate, existing footpaths and bridleways. In the interest of precision, this policy should refer to the footpaths and bridleways as identified on the Proposals Map. Subject to this modification, Policy DEB12 has regard to national policy and contributes towards sustainable development. Modified Policy DEB 12 meets the Basic Conditions.

169. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy DEB 12 to read as follows:**

DEB 12 (Policy 12 – Non-motorised networks)

- a) **Existing footpaths and bridleways identified on the Proposals Map provide a high level of amenity value and will be protected. New developments should take every opportunity to enhance existing networks and provide new networks where appropriate.**

DEB 13 (Policy 13 - Supporting Financial Sustainability)

170. Paragraph 28 in the NPPF states: *planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.* This includes that neighbourhood plans should support sustainable rural tourism.
171. Core Strategy Focused Review Policy FC3 supports economic development proposals in rural areas, including tourism, *that cannot be more sustainably located closer to existing settlements and where the proposal is restricted in size, scale and type appropriate to a rural setting.*
172. Policy DEB 13 supports tourism proposals, subject to ensuring they have regard to local character, are suitably designed and do not have an adverse traffic impact. As such, Policy DEB 13 has regard to national policy, contributes towards sustainable development, particularly the economic and social roles, and is in general conformity with strategic policy. Policy DEB 13 meets the Basic Conditions.

DEB 14 (Policy 14 – Employment)

173. The NPF seeks to build a strong competitive economy and emphasises the need to plan positively to meet the development needs of business.
174. Core Strategy Focused Review Policy FC3 refers to policies to protect existing employment sites from loss to other inappropriate uses.
175. Policy DEB 14 seeks to protect existing local employment. It appears to have been copied from a local plan policy. As such, reference to urban regeneration has crept into criterion e). Such a reference is not relevant to the village of Debenham and thus should be deleted.
176. The Proposals Map identifies the existing commercial core. There are no sites designated for employment in the Plan, although criterion a) refers to designated sites. In addition criterion a) needs to refer to compliance with policies in this neighbourhood plan and other relevant adopted development plan policies, rather than other local plans. Therefore, in the interest of precision I have suggested revised wording for criterion a) in Policy DEB 14.
177. Subject to the modifications I have recommended above, Policy DEB 14 has regard to national policy, contributes towards sustainable development, particularly the economic role, and is in general conformity with strategic policy. Modified Policy DEB 14 meets the Basic Conditions.
178. **Recommendation: to meet the Basic Conditions, I recommend modification to criteria a) and e) in Policy DEB 14 to read as follows:**

- a) Any non-employment use proposed on sites and premises used for employment purposes, and that is expected to have an adverse effect on employment generation, will only be permitted where the local planning authority is satisfied that the proposal can demonstrate that it complies with other policies in this neighbourhood plan and other relevant adopted development plan policies, and one or more of the following criteria has been met (as appropriate to the site/premises and location).
- e) an alternative use or mix of uses would offer greater benefits to the community in meeting local business and employment needs.

DEB 15 (Policy 15 – Broadband)

- 179. The NPPF emphasises that advanced high quality communications infrastructure is essential for sustainable economic growth and plays a vital role in enhancing the provision of local community facilities and services.
- 180. The first paragraph in Policy DEB 15 is explanatory text rather than policy and thus should be moved to the section on the principle reasons for the policy.
- 181. The remaining section a) of Policy DEB 15 seeks to enable high speed broadband to aid employment and assist those wishing to work from home. As such, this part of Policy DEB 15 has regard to national policy as referred to above and contributes towards the economic and social roles of sustainable development. Modified Policy DEB 15 meets the Basic Conditions.

182. **Recommendation: to meet the Basic Conditions, I recommend**

1) The incorporation of the first paragraph in Policy DEB 15 into the section referring to the principle reasons for the policy; and

2) modification to Policy DEB 15 to read as follows:

DEB 15 (Policy 15 – Broadband)

a) The provision of high speed broadband is seen as essential to all development proposals (dwellings and business) in the village. All new dwellings and business shall incorporate a suitable infrastructure to enable high speed broadband.

DEB 16 (Policy 16 – Debenham’s Retail Core)

- 183. Paragraph 28 in the NPPF promotes a strong rural economy. It states that neighbourhood plans should *promote the retention and development of local services and community facilities in villages, such as local shops, meeting*

places, sports venues, cultural buildings, public houses and places of worship.

184. Core Strategy Policy CS12 supports appropriate new retail development in the Debenham District Centre.
185. Policy DEB 16 seeks to retain existing retail businesses and diversify and enhance the range of shops in the core retail area. As such, this policy has regard to national policy to promote a strong rural economy, contributes towards sustainable development and is in general conformity with strategic policy. In the interest of precision, I recommend reference to the Proposals Map in the policy; otherwise Policy DEB 16 meets the Basic Conditions.
186. **Recommendation: to meet the Basic Conditions, I recommend modification to criterion a) in Policy DEB 16 to read as follows:**
- a) Change of use of ground floor shops or services to residential within the retail core area identified on the Proposals Map will only be considered favourably where the business has been marketed diligently at a fair market price and continuously for at least one year.**

DEB 17 (Policy 17 - Landscaping)

187. The NPPF seeks high quality design. Paragraph 58 in the NPPF refers to the need for policies in neighbourhood plans to: *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation.*
188. Paragraph 109 in the NPPF emphasises the need to conserve and enhance the natural environment.
189. Core Strategy Policy CS5 seeks to protect and conserve landscape qualities.
190. Debenham is set to a considerable extent within rolling valleys. Criteria a) and c) in Policy DEB 17 seeks to ensure appropriate landscaping of edge of village development and that the historic landscape character of the village is protected by avoiding development on upper valley sides and ridgelines. This is a response to local character and history, which has regard to national policy in this respect. In addition, it contributes towards sustainable development, particularly the environmental role and is in general conformity with strategic policy.
191. Criterion b) in Policy DEB 17 requires all development to provide landscaping and buffer planting. It must be remembered that the definition of development encompasses a wide range, including change of use. There will be many instances where it is not appropriate to require landscaping, particularly buffer landscaping. Policy DEB 2 already requires buffer landscaping for residential sites adjoining the settlement boundary. For

these reasons, I recommend the deletion of criterion b) from Policy DEB 17. Subject to this modification, Policy DEB 17 meets the Basic Conditions.

192. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy DEB 17 to read as follows:**

DEB 17 (Policy 17 - Landscaping)

a) The design and layout of new development on or close to the edge of the village should take account of, respect, and seek to preserve the character of adjacent countryside, green spaces, and landscape setting by providing appropriate landscaping, open areas and tree planting to act to help, to assimilate the proposal into its context; and

b) In order to maintain the historic landscape character of the village, new developments should avoid upper valley sides and ridgelines. In order to mitigate the impact of development on lower slopes, substantial landscape belts should be provided on upper valley sides and ridgelines.

DEB 18 (Policy 18 - Green Spaces)

193. Paragraph 76 in the NPPF allows for neighbourhood plans to *identify for special protection green areas of particular importance to them.*
194. Paragraph 77 in the NPPF states that: *The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:*
- where the green space is in reasonably close proximity to the community it serves;*
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- where the green area concerned is local in character and is not an extensive tract of land.*
195. I must emphasise that in order for an area to be designated as a Local Green Space, it has to meet all the criteria for designation. There is no directly relevant adopted strategic policy.
196. I have visited the Parish and seen the proposed Local Green Spaces. The Supporting Document: *Local Green Space Appraisal* (November 2017) seeks to explain how each chosen site complies with paragraph 77 in the NPPF. I am satisfied from the appraisal and my site visits that all the chosen sites meet the criteria for designation.

197. It appears that Hoggs Kiss and the Millennium Wood are the same site and thus should only be recorded once in the policy.
198. Paragraph 76 in the NPPF states: *By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.* Whilst PPG recognises that utility infrastructure sometimes has particular locational needs which mean otherwise protected areas may exceptionally have to be considered, the very special circumstances are not defined in the NPPF and it is not for me to decide whether utility infrastructure constitutes very special circumstances. Therefore, having regard to national policy, I recommend deletion of such a reference in Policy DEB 18.
199. In the interest of precision, the Local Green Spaces should be identified on the Proposals Map, or on inset maps, on an ordnance survey base to ensure that the sites are clearly defined.
200. Subject to these modifications, the sites in Policy DEB 18 meet the criteria for designation as Local Green Spaces. Modified Policy DEB 18 meets the Basic Conditions.
201. **Recommendation: to meet the Basic Conditions, I recommend:**
- 1) the identification of the Local Green Spaces on the Proposals Map or inset maps, on an ordnance survey base; and**
- 2) modification to Policy DEB 18 to read as follows:**
- DEB 18 (Policy 18 - Green Spaces)**
- a) The Neighbourhood Plan designates the following locations as Local Green Spaces, as shown on the Proposals Map:**
- The Recreation Ground;**
- Churchyard of St Mary's Church**
- The Cemetery;**
- Market Green;**
- Cross Green;**
- Debenham Allotments;**
- Hoggs Kiss Millennium Woodland;**
- Hoppit Wood and Lake;**
- Wells Way Play Area;**
- Raedwald Play Area;**
- Lower Gardeners Road Play Area;**

Upper Gardeners Road Play Area;

Lock Close Green; and

Andrews Close Green;

b) Proposals for any development on the Local Green Spaces will be resisted other than in very special circumstances.

DEB 19 (Policy 19 - Gardens)

202. One of the core principles in the NPPF is to: *always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and building*. Core Strategy Policy CS5 requires all development to maintain and enhance the environment and retain local distinctiveness. (These are also relevant to Policies DEB 20 and DEB 22 below).
203. Policy DEB 19 seeks to ensure that all new residential units have direct access to an area of private amenity space and in particular, a continuation of large front gardens where they already exist. This ensures a good standard of amenity for future residents, that retains local distinctiveness. As such, Policy DEB 19 has regard to national policy, contributes towards sustainable development, particularly the social and environmental roles, and is in general conformity with strategic policy. Policy DEB 19 meets the Basic Conditions.
204. The explanatory text for Policy DEB 19, on page 59 goes beyond the policy requirements in Policy DEB 19. This causes internal conflict in the Plan. Therefore, in the interest of precision, I recommend the deletion of all but the first two sentences of the second paragraph under 'Our Aims' on page 59.
205. **Recommendation: to meet the Basic Conditions, I recommend modification to the second paragraph under 'Our Aims' on page 59 to read as follows:**

Private amenity space can make an important contribution in improving the quality of life of the village's residents and supporting and enhancing local biodiversity. The National Planning Policy Framework sets out the need to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

DEB 20 (Policy 20 – Public Realm)

206. Policy DEB 20 seeks the conservation or enhancement of buildings and public spaces by all development. In effect, this does not allow for any demolition and I am sure this is not the intention of the local community. In

addition, there may be many instances where development has no impact on existing buildings or public spaces. Therefore, I recommend deletion of this part of Policy DEB 20. The remaining part of Policy DEB 20 seeks high quality design. This has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Modified Policy DEB 20 meets the Basic Condition.

207. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy DEB 20 to read as follows:**

DEB 20 (Policy 20 – Public Realm)

a) In Debenham village, all development will be expected to be of high quality design to promote a strong sense of place and an accessible and inclusive village. Particular attention should be paid to shop fronts and advertisements, quality of materials used, enhancement of spaces through trees and landscaping and street furniture.

DEB 21 (Policy 21 – Conservation)

208. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes duties requiring special regard to be had to the desirability: firstly at Section 16(2), of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses; and secondly, at Section 72(1), of preserving or enhancing the character or appearance of a Conservation Area.
209. The NPPF advises that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.
210. Policy CS5 in the Core Strategy seeks to maintain and enhance the historic environment. The core of the village of Debenham is a Conservation Area and it contains a considerable number of listed buildings.
211. Policy DEB 21 seeks to conserve and enhance the historic environment. It emphasises the significance of heritage assets. My only adverse comment is that not all development has an impact on heritage assets. Therefore, in the interest of precision, I recommend the insertion of 'where appropriate' near the beginning of the policy. Subject to this modification, Policy DEB 21 has regard to national policy, contributes towards sustainable development, particularly the environmental role, and is in general conformity with strategic policy. Modified Policy DEB 21 meets the Basic Conditions.
212. In criterion d) there should be a comma between 'design' and 'which'. **I see this as a minor editing matter.**

213. **Recommendation: to meet the Basic Conditions, I recommend modification to the beginning of Policy DEB 21, prior to the list of criteria, to read as follows:**

To ensure the conservation and enhancement of Debenham's historic environment, proposals should, where appropriate:

DEB 22 (Policy 22 – Views)

214. Policy DEB 22 seeks to ensure that new development responds to site features and allows the continued enjoyment of key features in highly valued views. I have visited the Parish and understand the importance of these views to the local community. It is clear that Policy DEB 22 does not restrict development in the areas of highly valued views if the key features of the views can continue to be enjoyed.
215. Views highly valued by the community are shown in photographs of 14 views in paragraph 5.7. Policy DEB 22 refers to this paragraph and refers to views shown on Map 5 on page 25. That map identifies 20 views. In addition, the Proposals Map has subsequently been provided and that shows a different set of views. This creates internal confusion in the Plan. I have taken the views highly valued by the community to be those identified in the photographs in paragraph 5.7. Therefore, in the interest of precision, Map 5 and the Proposal Map should be modified accordingly.
216. I have taken the key features of the highly valued views to be those identified for each view in paragraph 5.7. Therefore, in the interest of precision, I recommend reference to these key features in paragraph 5.7 to be included in Policy DEB 22. I have suggested revised wording, incorporating reference to the Proposals Map. Subject to this modification, Policy DEB 22 has regard to national policy, contributes towards sustainable development, particularly the environmental role, and is in general conformity with strategic policy. Modified Policy DEB 22 meets the Basic Conditions.
217. **Recommendation: to meet the Basic Conditions, I recommend**
- 1) modification to Map 5 and the Proposals Map to identify the views highly valued by the community shown in photographs in paragraph 5.7; and**
 - 2) modification to Policy DEB 22 to read as follows:**
- DEB 22 (Policy 22 – Views)**
- a) New development should be designed to have a positive and distinctive character by designing the development to respond to site features such as views into or out of the area, trees landscapes, and existing buildings. Views highly valued by the community are shown on the Proposals Map and their key features are identified in paragraph**

5.7 on page [xx]. Development which affects these highly valued views must ensure that key features of the view can continue to be enjoyed including distant buildings, areas of landscape and the boundaries between the village edge and the countryside.

DEB 23 (Policy 23 – Nature Conservation)

218. The NPPF, in Section 7 requires the planning system to contribute to and enhance the natural and local environment. This includes protecting and enhancing valued landscapes and minimising impacts on biodiversity and providing net gains in biodiversity where possible. The aim is to conserve and enhance biodiversity, whilst allowing adequate mitigation and the loss of irreplaceable habitats if the need for, and benefits of, the development in that location clearly outweigh the loss.
219. Core Strategy Policy CS5 requires all development to maintain and enhance the environment and retain local distinctiveness.
220. The first sentence in Policy DEB 23 seeks to retain features of high nature conservation or landscape value. Whilst this is a laudable aim, it does not have regard to national policy, which allows for adequate mitigation and for loss of irreplaceable habitats if the need for, and benefits of, the development in that location clearly outweigh the loss. If I were to recommend modification to the first sentence in Policy DEB 23, it would add no local policy detail above that required in national policy. Therefore I recommend the deletion of this sentence.
221. The *principal reasons for the policy* will need to be modified as a consequence of the deletion recommended above. **I see this as a minor editing matter.**
222. The second sentence in Policy DEB 23 seeks to improve connectivity. This has regard to national policy to seek to enhance biodiversity, contributes towards the environmental role of sustainable development and is in general conformity with strategic policy. The second sentence in Policy DEB 23 meets the Basic Conditions.
223. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy DEB 23 to read as follows:**
224. **DEB 23 (Policy 23 – Nature Conservation)**
- a) Improvement of the connectivity between wildlife areas and green spaces will be encouraged to enhance the green infrastructure of the Parish.**

DEB 24 (Policy 24 - Financial Contributions)

225. Core Strategy Policy CS6 seeks infrastructure contributions. Mid Suffolk introduced a Community Infrastructure Levy (CIL) in 2016.
226. CIL can be considered in two parts. Firstly, money is retained by MSDC to spend on infrastructure as detailed on their 'Regulation 123' list. Secondly a neighbourhood portion can be given to the Parish Council. Parish councils are not required to spend their neighbourhood funding in accordance with the charging authority's priorities. The neighbourhood portion of the levy can be spent on a wider range of things than the rest of the levy, provided that it meets the requirement to 'support the development of the area'.
227. Policy DEB 24 seems to have muddled together the two parts of CIL. I have suggested revised wording that refers to CIL contributions towards the list of infrastructure improvements and enhancements for CIL funding as identified in the Key Community Actions Section. Such a modification has regard to national policy on CIL funding, contributes towards sustainable development and is in general conformity with strategic policy. Modified Policy DEB 24 meets the Basic Conditions.
228. It is not correct to state in the 'Our aims' paragraph on page 63 that new infrastructure is needed when any further development occurs. This may not be relevant to many small-scale developments. In addition, there is no robust evidence to justify the requirement for all facilities suggested in this paragraph and this paragraph does not correlate with the Key Community Actions identified in section 10. Therefore, in the interest of precision, I recommend the deletion of this paragraph.
229. The list of Key Community Actions includes a policy requirement for new developments of over 5 houses to provide significant indigenous plant schemes and greening. This is not a policy requirement in the Plan. Therefore, in the interest of precision, to avoid internal conflict within the Plan, I recommend deletion of this requirement.
230. **Recommendation: to meet the Basic Conditions, I recommend:**
- 1) the deletion of the 'Our aims' paragraph on page 63;**
 - 2) the deletion of the requirement for new developments of over 5 houses to provide significant indigenous plant schemes and greening in the Key Community Actions; and**
 - 3) modification to Policy DEB 24 to read as follows:**
- DEB 24 (Policy 24 - Financial Contributions)**
- a) Financial contributions paid directly to the local community as a result of the Community Infrastructure Levy, will be held by the Parish Council and used to deliver the infrastructure improvements and**

enhancements and other priorities set out in the Key Community Action section of the Neighbourhood Plan.

Background Documents

231. In order for me to take background evidence into consideration in my examination, I need access to background documents. I asked for the documents in Sections 13, 14 and 15 which have been relied on to support the policies in the Plan. Via email dated 19 September 2018 I was informed of the difficulty in providing a number of the documents. As such the Parish Council has suggested that Section 15 is withdrawn. There is a list with electronic links to a number of documents in Sections 13 and 14 on the MSDC web site as part of the supporting documents. I have included that list in Appendix 1. In the interest of precision, to provide a practical framework for decision making, I recommend that Sections 13, 14 and 15 are replaced with the supporting documents in that list. For clarity, I was unable to take into consideration the documents referred to in Sections 13, 14 and 15 that are not on that list.
232. **Recommendation: to meet the Basic Conditions, I recommend the deletion of Sections 13, 14 and 15 and their replacement with the list of supporting documents at the end of Appendix 1 below.**

Referendum and the Debenham Neighbourhood Plan Area

233. I am required to make one of the following recommendations:
- the Plan should proceed to Referendum, on the basis that it meets all legal requirements; or
 - the Plan as modified by my recommendations should proceed to Referendum; or
 - the Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.
234. **I am pleased to recommend that the Debenham Neighbourhood Plan 2016 - 2036 as modified by my recommendations should proceed to Referendum.**
235. I am required to consider whether or not the Referendum Area should extend beyond the Debenham Neighbourhood Plan Area. I see no reason to alter or extend the Neighbourhood Development Plan Area for the purpose of holding a referendum.

Minor Modifications

236. The Plan is a well-written document, which is easy to read. Where I have found errors, I have identified them above. It is not for me to re-write the Plan. If other minor amendments are required as a result of my proposed modifications, I see these as minor editing matters which can be dealt with as minor modifications to the Plan. As a general point, the Map keys are very difficult to read on both paper and electronic versions of the Plan.

Janet Cheesley

Date 29 October 2018

Appendix 1 Background Documents

The background documents include:

The National Planning Policy Framework (The Framework) (2012)
The Planning and Compulsory Purchase Act 2004
The Localism Act (2011)
The Neighbourhood Planning (General) Regulations (2012)
The Neighbourhood Planning (General) (Amendment) Regulations (2015)
The Planning Practice Guidance (2014)
The Saved Policies in the Mid Suffolk Local Plan (1998)
The Mid Suffolk Local Plan First Alteration: Affordable Housing (2006)
The Mid Suffolk Core Strategy Development Plan Document (2008)
The Mid Suffolk Core Strategy Focused Review (2012)
Babergh & Mid Suffolk Joint Local Plan: Consultation Document (August 2017)
Regulation 16 Representations and response from the Parish Council Examination Correspondence (On the MSDC web site)
The Joint Babergh and Mid Suffolk District Council Landscape Guidance (August 2015)
MSDC Community Infrastructure Levy
The Debenham Neighbourhood Plan Area Map
Debenham Neighbourhood Plan 2016 - 2036 (May 2018)
Debenham NP Basic Conditions Statement
Debenham NP Consultation Statement
Debenham NP SEA Determination Notice
Debenham NP HRA Determination Notice
Debenham NP SEA / HRA Screening Report (V2) (Jun 2018)
Debenham NP SEA / HRA Screening Report (Jan 2018)
Debenham NP SEA Scoping Report (March 2018)
Debenham NP SEA Environmental Report (June 2018)

Supporting Documents to replace Sections 13, 14 and 15

Debenham NP Site Assessment Report (Dec 2017)
Landscape Character Assessment – Natural Environment Baseline Evaluation
Debenham NP Local Green Spaces Appraisal (Nov 2017)
Debenham Village, Flood Mapping Extension Project (Nov 2014)
Debenham Housing Needs Survey Report (Nov 2014)
Debenham Conservation Area Appraisal (Nov 2009)