



**Comments on REG16 Representations by Fressingfield NDP Steering Group
October 2019**

Number	Name of respondent	Summary of Representation	NDP SG Comment
1	Suffolk County Council	<p>The county council is supportive of the Parish Council’s vision for the Parish, however in reviewing the plan and consultation statement it became apparent that the County Council’s response to the regulation 14 consultation was not received by the parish council. This is unfortunate, however the response of the parish and district councils when this was raised has been positive, which is very much appreciated.</p> <p>There are two particular issues where the county council disagrees with recommendations made by Mid Suffolk District Council, which have since been incorporated into the plan; flood risk and drainage and highway safety. These comments have been made in discussion with the district and parish councils. This response will focus on the Basic Conditions the plan must satisfy in order to proceed to referendum. These are:</p> <p>a) having regard to national policies and advice contained in guidance issued by the Secretary of State;</p> <p>b) the plan contributes to the achievement of sustainable development;</p>	<p>It is regretted that the SCC REG14 rep was not received and therefore not considered.</p> <p>There have been informal discussions at Parish, District and County level on the issues contained within this representation.</p> <p>There is no objection from the Parish to the Examiner making the changes to the NDP as requested by SCC insofar as she may be minded. It is understood that the District Council is also content.</p>

		<p>c) the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority</p> <p>d) the neighbourhood plan does not breach, or is compatible with EU obligations</p> <p>Where an amendment has been suggested in, deleted text will be shown in strike through and added text will be shown in <i>italics</i>.</p> <p>Flooding – FRES11</p> <p>Flooding and water management was one of the key policy areas that SCC made recommendations at the regulation 14 consultation stage. The plan shows awareness of the flooding issues around the Anglian Water foul water sewer system which can become overwhelmed during high rainfall events. The county council supports of Objective 9 of the plan to prevent the increase of and reduce existing risk of flooding.</p> <p>As background, SCC’s reg. 14 response also provided some information on the local water environment and ground conditions in Fressingfield which can be read in appendix 1. It is noted that the district council made recommendations to amend the wording of policy FRES 11, which have been incorporated into the neighbourhood plan. While it is recognised that these recommendations were well intentioned, as the Lead Local Flood Authority SCC has some concerns around the effectiveness and clarity of this policy and does not consider the policy to meet the Basic Conditions.</p> <p>The first sentence of this policy states that development should include rainwater capture and grey water recycling. While this is supported in principle these are not flood mitigation measures or drainage solutions, they are</p>	
--	--	---	--

		<p>resource sustainability solutions and so not suitable to include in this policy. Removing this requirement from policy FRES 11 would not be of detriment to the plan, as these requirements are also in policy FRES 12, and place the focus of this policy on flooding and drainage issues, improving clarity. The first sentence also states development should “reduce flow discharge from the site by 10%”.</p> <p>While SCC support policy to require development to mitigate its own impacts and that development reducing existing flood risk is appropriate in Fressingfield, but this element of the policy is not sufficiently clear and does not have evidence to support the specific 10% figure.</p> <p>To clarify the policy, it should require that development achieve a runoff rate lower than the existing greenfield rate. The 10% figure should be removed as site specific evidence (such as a Flood Risk Assessment) will determine the most appropriate drainage measures and the ability of a site to reduce existing flood risk.</p> <p>The second sentence of the policy does not meet Basic Condition of having consideration for national policy. NPPF paragraph 165 states “Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.” The policy instead uses the term “unviable”.</p> <p>There is a difference between the terms “inappropriate” and “unviable”. Unviable indicates financial reasons, whereas inappropriate means the circumstances of the site do not lend to the use of SUDS (for example a site could be contaminated). The county council’s concern is that the whole principle of surface water management through SUDS would be set against viability. This would not address the clear need for development to</p>	<p>No objection to this suggestion.</p>
--	--	--	--

	<p>incorporate SUDS as required by national policy. It is recommended this sentence is deleted.</p> <p>The third sentence of the policy is supported however could be more concise, stating simply that “development shall not be supported in areas of significant flood risk”.</p> <p>For these reasons the county council recommends that the first paragraph of policy FRES 11 is replaced with the suggested text below.</p> <p><i>All new development (including minor development) is required to use appropriate sustainable drainage systems to mitigate its own flooding and drainage impacts, avoid increase of flooding elsewhere and seek to achieve lower than greenfield runoff rates. No development will be supported in areas of significant flood risk.</i></p> <p>As with the regulation 14 response, flood maps accompany this letter. These maps indicate areas of flood risk and locations of specific flood events. Policy FRES 11 also identifies areas of particular concern to the local community.</p> <p>For completeness Laxfield road should be added to this list as the SCC flood maps highlight a cluster of flood events along this street.</p> <p>It is recommended the SCC flood maps are included as part of the plan evidence base.</p> <p>Transport</p> <p><i>Policy FRES 10</i></p> <p>Part k of the policy refer to “sufficient” parking without defining what sufficient means. Mid Suffolk District Council have adopted the Suffolk Guidance for Parking (updated 2015).</p>	<p>No objection to this suggestion.</p> <p>No objection to this suggestion.</p> <p>It is understood locally that the issue of flooding on Laxfield Road has improved since a blocked pipe under the road was fixed. However, there is no objection to the inclusion of Laxfield Road in this policy. No objection to the inclusion of the SCC flood maps as part of the evidence base.</p>
--	--	---

		<p>In order to improve the clarity of this policy reference should be made to the guidance within policy or explanatory text.</p> <p><i>Policy FRES 15</i></p> <p>The redrafted version of this policy is not supported as it does not meet the Basic Conditions. The regulation 14 consultation draft of the plan supported proposals which included safe and attractive pedestrian access and proposals which would improve walking and cycling levels in the neighbourhood plan area which the county council supported.</p> <p>The inclusion of the phrase “unless it can be demonstrated to be impractical” in the submission version of the plan does meet the Basic Conditions of having regard to national planning policy or contributing to the achievement of sustainable development. NPPF paragraph 110 states that “development should... give first priority to pedestrian and cycle movements both within the scheme and neighbouring areas.” And paragraph 91 states that “planning policies and decision should aim to achieve health, inclusive and safe places which... enable and support healthy lifestyles...”</p> <p>As currently worded the policy could allow for development that does have a pedestrian and cycle access to the existing village, which is not compatible with the national policy stated above. Where there are no walking or cycling routes available means residents in new communities will not have the opportunity to use these modes of travel and benefit from the positives to health and wellbeing they can provide. By necessity they will likely use private cars, which is less sustainable. This is also counter to emerging district policies in the Babergh and Mid Suffolk Joint Local Plan which states development should create “walkable neighbourhoods”.</p>	<p>No objection.</p> <p>If it assists the Examiner a footnote (similar to that used in Part i) could be added to Part k) of the Policy.</p>
--	--	--	---

		<p>To meet the basic conditions amendments to the policy are recommended below.</p> <p><i>All new developments shall take opportunities to provide safe and attractive pedestrian and cycle links that connect to existing networks appropriate to the scale and location of the development and seek to improve levels of walking and cycling in the Neighbourhood Plan area unless it can be demonstrated to be impractical</i></p> <p>The second paragraph of the policy also does not have consideration to national policy as it appears to set a more strict test for regarding highway network function and safety. Paragraph 109 of the NPPF states that development should only be refused on highway ground of the impacts or residual cumulative impacts are “severe”. This policy sets a standard of no increase to traffic flows, which is not possible. Development, particularly in a rural setting where car ownership tends to be high, will lead to an increase in traffic, however this in itself is not a reason to refuse a planning application. It is appropriate that the policy requires development to mitigate its impact as much as possible relative to the scale of the development. It is recommended that the policy is amended to state:</p> <p><i>All new developments shall take opportunities to provide safe and attractive pedestrian and cycle links that connect to existing networks appropriate to the scale and location of the development and seek to improve levels of walking and cycling in the Neighbourhood Plan area.</i></p> <p>NPPF paragraph 92 states that planning policies should “take into account and support the delivery of local strategies to improve health, social, and cultural wellbeing for all sections of the community”.</p> <p>SCC, as part of the Suffolk Health and Wellbeing Board has recently refreshed the Joint Suffolk Health and Wellbeing Strategy which encourages a “health in all policies approach”, to incorporate health considerations into decision</p>	<p>No objection to this suggestion. In addition there would be no objection to the addition of wording in the policy from NPPF paragraph 110 which “gives first priority to pedestrian and cycle movements both within the development and neighbouring areas”</p> <p>No objection. See above</p>
--	--	---	---

		<p>Public Rights of Way</p> <p>It is noted that “rural footpaths” are highlighted as important to the community in paragraph 6.7. It is likely that these footpaths will be part of the Public Rights of Way (PRoW) network. PRoW are public routes which perform a number of functions, including:</p> <ul style="list-style-type: none"> • enabling access to the countryside, which has benefits for health and wellbeing; • providing links between rural communities; and • acting as wildlife corridors. <p>NPPF paragraph 98 states that planning policies should “protect and enhance the public rights of way network”.</p> <p>Presently the Mid Suffolk planning policies do not do this in a general sense, however SCC will be working with the district council to ensure this is rectified in the Babergh Mid Suffolk Joint Local Plan. In the meantime, the Neighbourhood Plan could include policy to achieve this. It is recommended that the following wording is inserted into the plan, either as its own policy or as a part of another policy.</p> <p><i>“Where Public Rights of Way should be protected and where possible enhanced, with new routes or connections.”</i></p>	<p>No objection to this suggestion. The preference would be for it to be included as a final paragraph in FRES.15 rather than as a separate policy.</p> <p>It is possible that there are words missing in the SCC suggestion and that the words “exist, they” should be added after ‘Way’</p>
2	Natural England	No specific comments	No comment
3	Historic England	No specific comments	No comment
4	Environment Agency	We support section 6.49 with regards to sequentially siting proposed development into less vulnerable areas. This could be enhanced to state that all proposed development applications in flood zones 2 or 3 should be	This repeats national guidance in NPPF paragraphs 155 to 165.

		<p>accompanied with a Flood Risk Assessment and should not increase flood risk elsewhere.</p> <p>In regards, to section 6.47 we can confirm that our flood data for our flood maps comes from flood models rather than reports from residents of flooding. We do appreciate and accept information relating to local flooding in area and we use this information towards our history of flooding reports. Reporting localised fluvial flooding should be reported us ourselves and reports of surface water flooding should be reported to the Lead Local Flood Authority, which in this case is Suffolk County Council.</p> <p>You should be using our up to date flood maps which can be found here. These can also be found within the Strategic Flood Risk Assessment (SFRA), however the SFRA for Mid Suffolk council is currently out of date. There are clear separate maps for fluvial flooding and surface water flooding, and these remain two separate constraints when reviewing proposed developments for planning. This should be reflected in the Neighbourhood plan.</p>	<p>Appendices D and E of the NDP contain maps with surface water and fluvial flooding</p>
5	National Grid	<p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>	<p>No comment</p>
6	Suffolk Preservation Society	<p>In recent years the SPS has worked to support residents of Fressingfield in responding to the raft of speculative planning applications and we are delighted that the parish has responded positively by the production of this draft Neighbourhood Plan. We congratulate the Neighbourhood Plan team on the outstanding draft document and the thorough assessment work that has been undertaken in particular on landscape, design and heritage.</p> <p>The SPS strongly endorse the efforts to safeguard the special heritage and landscape qualities of Fressingfield. We are particularly impressed that you have identified and</p>	<p>No comment</p>

		<p>drafted a policy for the protection of Non Designated Heritage Assets. You are one of small minority of plans to date that has recognised the importance of this area of heritage management from the outset and we applaud you for your insight. We also consider that the identification of Local Green Spaces and the production of the Character Appraisal will help to guide and promote appropriately located and high quality design going forward.</p> <p>The Society fully supports the Fressingfield Neighbourhood Plan.</p>	
7	SAFE	<p>SAFE is a group of Fressingfield residents involved in Planning Issues. Our full range of activities can be seen on our web site fressingfieldhousing.org</p> <p>Our mandate originated from a scientifically sound petition within the village where our aims to prevent overdevelopment were supported by 94% of villagers.</p> <p>SAFE supports the adoption of the Neighbourhood Plan and recognises that a great deal of work has gone into its production.</p> <p>Individual members of SAFE will be making comment on the detail within the Plan, but the overall principles are supported by our Group.</p>	No comment
8	Castro (resident)	<p>General Comment</p> <p>The NDP Working Group should be congratulated for all of the time and effort they have devoted to the production of this Plan. The result is a comprehensive and well thought through document. The two public open forums were extremely well advertised and a wealth of material was on display and Group members were on hand to answer questions. It is disappointing that so few villagers subsequently submitted written responses but the lack of submissions in no way reflects the efforts by the Group to engage local people in the process.</p> <p>We believe the key issues to be:</p>	

		<p>1. Failure to explain how a target figure of 60 houses was arrived at 2. The introduction of a Section on Community Housing Trusts, not in the original submission nor forming part of the public meetings 3. The use of the wrong figures for listed buildings/assets in the parish thereby down playing their significance.</p> <p>2.15 The statement on Listed buildings is incorrect. Attached is a schedule of the listed buildings/assets in Fressingfield – 58 including two Grade 1 and two Grade II*. Fressingfield has a very high number of listed buildings, not low as stated in the document. The ratio of listed buildings to the total number of buildings in the parish must be one of not the highest in Mid Suffolk . This should be corrected and brought to the attention of the Inspector. The emerging Local Plan and the NPPF place emphasis on protecting historic assets and “their setting”. As there are so many listed assets this should be a significant issue. We did highlight the error in our response to the first round of consultation but were merely referred to the source document. The error should be corrected.</p> <p>3.5 and 5.2 It is very clear that the document is not about preventing development, but is about setting the parameters within which development can take place. A key issue is the agreed level of new housing. Unfortunately from the document it is not possible to understand how a target of 60 new homes over the plan period is calculated. This is not helped by the figure in 3.5 being incorrect. For Mid Suffolk the correct figures are 1174 new homes spread across 44 hinterland villages during the plan period. (this would result in an average of 27 per village , but it is recognised that not all hinterland villages are equal).</p>	<p>Agree that there are 58 Listed Buildings in the Parish of Fressingfield and the factual error should be corrected in the NDP and the Character Appraisal.</p> <p>Agree that the figure in paragraph 3.5 of 894 is incorrect – this is the Babergh figure. It should be replaced by the Mid Suffolk figure of 1174 as suggested.</p>
--	--	---	--

		<p>Subsequent correspondence with Andrea Long and discussion with Elizabeth Thomas (MSDC) have enabled us to understand how this is arrived at. In the draft Local Plan a minimum of 56 homes is recommended (51 already having planning approval). This figure can only move upwards through the recommendations within NDP. The NDP has produced a target of 60 but there is no supporting evidence based on an assessed housing need. Whilst this is a target Andrea long wrote to us on 7th August:</p> <p>“It is possible that if the traffic and flood issues in the village are not resolved during the Plan period and that the District Council continues to refuse applications as a consequence, that this windfall allowance of 9 may not be achieved”. This position is confirmed in the draft NDP.</p> <p>The figure of 60 homes is therefore supported by the Parish Council, the Local Authority and whilst there is no evidence to support the additional 4 homes over and above the Local Plan, the target seems reasonable subject to the issue raised in Andrea Long’s email.</p> <p>The figure in 3.5 should be corrected.</p> <p>4.1</p> <p>Whilst this is a visionary statement aspirations should be deliverable. We do not think these are. There is no point in aiming for something that is not possible to achieve. How can a robust and sustainable infrastructure be achieved when sewerage egress and flooding cannot be corrected by Anglian Water and New Street physically cannot have pavements.</p>	<p>The figure of 60 dwellings includes a windfall allowance and is explained in paragraph 5.20 of the NDP.</p> <p>The Parish Council is actively working with Anglian Water and the County Council to address these two issues and this is reflected in the VIP (A and D) on pages 23 and 24 of the NDP, therefore it is possible that solutions could be reached during the plan period.</p>
--	--	--	---

		<p>4.8 Why is the village improvement plan here? This section has been greatly expanded since the first draft. It is state that the Improvement Plan is not a remit of the NDP. If this is the case it should be in an appendix if at all.</p> <p>Move VIP to appendix</p> <p>5.15 Not clear whether the comments made here were the majority of those attending the open sessions or a minority view.</p> <p>Need more clarity on the status of statements made</p> <p>5.27 The NDP policy in 4 bedroomed houses is unclear. FRES2 does not identify any need whereas para 5.27 does</p> <p>Clarification on the policy</p> <p>5.28 This section on Community Housing is completely new and its status is totally unclear. It was not within the original consultation document nor displayed at the public events. Whilst we accept that new issues will be incorporated in response to consultation this is a rather major one and is it or is it not part of</p>	<p>No objection to moving the draft VIP to the appendix but would prefer the text in paras 4.5 to 4.9 to remain.</p> <p>The comments relating to small sites below 10 were left as post it note comments as an addition to responses to the main question by some respondents. They were qualitative not quantitative.</p> <p>Paragraph 5.27 refers to the Babergh and Mid Suffolk SHMA which covers the need across both Districts. The policy reflects a specific Fressingfield community preference for 2-3 bedrooms (from the first consultation event)</p> <p>The paragraph is supporting text and is a factual statement that reflects the Parish Council’s early discussions/investigations on the</p>
--	--	---	---

		<p>the NDP? To include this within the document at this stage when it has not been widely consulted upon does not give it legitimacy. This lacks transparency and a failure in due process. We believe that as Community Housing Trusts have to operate within the legal planning framework are therefore surprised that this was not included in the original NDP submission.</p> <p>This should not have been included as it feels very much that this has been “slipped under the wire” contrary to the principles of open governance.</p> <p>7.4</p> <p>This para has been amended since the original to include the 55 people who work as CE Davidson. What it does not make clear is that the employees who live in the village have to travel from the centre of the village to the company HQ or the site where they are working. This adds to the traffic issues. There are only 64 whole time equivalent jobs physically in the centre of the village. Many of these require a higher degree – teacher, doctor, nurse etc</p> <p><u>Representation 2</u> Fressingfield NDP - Rural Exception Sites. (RES)</p> <p>Transparency is important when considering the implications of rural exception sites for housing requirement figures. RES are primarily to provide affordable housing, and market housing to be included only if viability is an issue. All dwellings introduced through a RES into an area would be <i>in addition</i> to the housing numbers determined by the Council and the neighbourhood plan.</p> <p>Such sites are a vital means of securing sustainability for rural villages as they guarantee affordable housing for local residents in perpetuity thus anchoring</p>	<p>matter. It was not included in the REG14 Version of the Plan because at that time there was nothing to report. The paragraph has been the subject of full consultation at REG16 and other than this representation there have been no other comments made/objections received.</p> <p>The heading could be amended as follows: “Community Led Housing/Community Land Trusts”</p> <p>This is a contextual paragraph that simply identifies the main employers/businesses in the parish. It does not seek to make comment about transport/traffic issues which are dealt with later in the Plan.</p> <p>It is unclear where in the NDP the suggested text is proposed to be inserted.</p> <p>The subject might be more suitable at a Local Plan level (the examples quoted are all from Local Plans) and the wording is general rather</p>
--	--	---	--

		<p>the economic and social benefits that long term residents bring. Conversely, such development should not overload infrastructure , while the market housing option included to make such affordable housing viable, should not distort housing need and open a loophole for unsuitable development. Drawing on the approaches from elsewhere and the NPPF itself, we suggest the following amendments to the NDP to ensure its objectives are met sustainably:</p> <ul style="list-style-type: none"> • RES must be (mirroring the NPPF requirements including for Entry Level Exception sites) <ul style="list-style-type: none"> - <i>‘adjacent to existing settlements and proportionate in size to them’, ‘not exceed 5% of the area of the existing settlement’.</i> - <i>‘not compromise the protection given to areas or assets of particular importance’ including ‘irreplaceable habitats; designated and undesignated heritage assets and areas at risk of flooding or coastal change.</i> • allocation of housing to employees of developers on RES should not lead to indirect subsidy of low wages • the reuse of agricultural buildings and brownfield sites should be prioritised for RES • RES must meet proven need and have strong community support (Cornwall’s Local Plan), both evidenced to explicit, robust standards • standards for infrastructure required should be based on up to date robust evidence • space, design and amenity standards should be specified • monitoring arrangements should be in place to ensure the ongoing prioritisation for existing residents • The important settlement patterns of ancient settlements (which include gaps in settlement) as well as important views and landscapes should not be lost due to RES • RES must be properly integrated with the village, <i>‘in terms of the relationship with the built form of the settlement and landscape setting and the quality of</i> 	<p>than site specific; it does not appear to be specific to Fressingfield and it is unclear where the justification and evidence specific to Fressingfield to support the proposed wording comes from</p> <p>It is unclear what is meant by the reference to allocation of housing to employees of developers on RES and the indirect subsidy of low wages and whether this is appropriate for inclusion within an NDP.</p> <p>There are also inherent conflicts in the proposed wording e.g. a priority for the reuse of agricultural buildings which are likely to be away from the main built up areas of the village yet requiring RES to be properly integrated into the village in terms of the built form of the settlement, pedestrian accessibility to village facilities etc.</p>
--	--	--	--

		<i>pedestrian accessibility to the facilities in the village (mirroring South Norfolk's Local Plan)</i>	
9	Maydon (resident)	I think the document as a whole is very good and it has taken considerable work to produce. However paragraph 2.15 is incorrect. Fressingfield does not have few listed buildings, of 23 in number it has 58 listed buildings!	Agree that the error in relation to the number of buildings requires correcting. See above.
10	Wolfe (resident)	<p>I am supporting paragraph 7.3 and policy FRES13 (the form won't let me tick the boxes above). My brother Toby Wolfe and I are the sons and executors of Martin Wolfe who (along with our mother Ann Wolfe who died in 2016) owned and lived at Wakelyns, Metfield Lane, Fressingfield. Over 25 years, they lived at Wakelyns and ran it as an experimental organic rotation agroforestry farm attracting many visitors and national and international attention and acclaim among the scientific, agricultural and wider social communities. The produce was sold locally, and they employed many local people over the years. We do not yet know how we are going to take that forward, but it is likely to involve continuation of their organic agroforestry farming system (possibly including elements of scientific research), potentially alongside a diversification and development of other sympathetic and sustainable farming and other business and social activities on the land and in the buildings. With that in mind, we are strongly supportive of the general thrust of what is set out in paragraph 7.3 and the relevant part (the last two paragraphs) of policy FRES13.</p> <p>However, as regards 7.3, we consider that the following sentence puts the position too narrowly: "Other influences that may have future impacts include factors such as genetic modification, technological advances, a shift to vegetarianism, disease and climate change." In particular, in our case (and others in due course we believe), the impetus for change is the wider national and international shift towards more sustainable farming and food systems including with close links to local communities.</p> <p>We would ask that the sentence above be tweaked to include that.</p>	<p>No objection to suggested wording to include reference to a wider national and international shift towards more sustainable farming and food systems including those with close links to local communities.</p>

		<p>We also do not understand the reference in the sentence to “disease”.</p> <p>As for FRES13, we would ask that the penultimate sentence also refer to the use and re-use of agricultural land, and not just buildings; and that the list of things which must be protected (i.e. the proviso in that paragraph, and “the criteria” mentioned in the following paragraph) is expanded to include landscapes, wildlife, hedges and trees.</p>	<p>The inclusion of the word disease is as a consequence of a representation made by the Havers Family at REG14.</p> <p>The addition of wording to include the promotion of the re-use of agricultural land in addition to buildings would be in conflict with NPPF paragraphs 170, footnote 53, and the environmental objectives of the NPPF which protect greenfield land.</p> <p>The issues of the impact of development on landscape, wildlife, hedges and trees is covered by FRES6</p>
11	C.E. Davidson Ltd	<p>We provided a substantial response to the previous consultation exercise in May 2019. Almost all of these comments are still applicable as no significant changes have been made to the plan (not even factual inaccuracies we pointed out).</p> <p>7.4 C. E. Davidson Ltd does own houses in Fressingfield but none of these are used to house employees. It is unclear on where this assertion has come from... Correction of above this paragraph. As always, we are happy to discuss our involvement in the village with anyone from the NDP Steering Group as many of them appear unaware of the businesses within Fressingfield.</p>	<p>The Consultation Statement sets out clearly where changes to the plan have been made in respect of previous representations made by this respondent including paras 2.2, 2.13, 2.22, 5.22 and 7.4.</p> <p>No objection to the suggestion to remove “which they use to house their employees” from paragraph 7.4 as respondent states it is factually incorrect.</p>

12	NWA Planning	<p>The plan provides for insufficient housing land to meet the needs of the village over the plan period and to make positive contribution to sustainability and community needs.</p> <p>Additional land should be allocated for housing development off John Shepherd Road (27 dwellings approximately) and fronting Stradbroke Road as part of a mixed use scheme which also makes provision for improved village retail and medical facilities.</p> <p>Land should be allocated for these purposes in accordance with attached plans.</p> <p>The plan should also make provision for the provision of improved retail floorspace to meet the needs of the village.</p> <p>Provision should be made in Stradbroke Road in accordance with attached plan.</p>	<p>The land shown on the attached plans at John Shepherd Road and Stradbroke Road were refused planning permission by Mid Suffolk District Council (albeit for larger land areas) in November 2018 – references 1432/17 and 1449/17</p> <p>No need for additional health facilities in Fressingfield has been identified by the relevant consultees to date. (Ipswich and East Suffolk CCG responded to the REG14 consultation).</p> <p>This is the first time that the potential for retail floorspace on the Stradbroke Road site has been made through the NDP process. It is unclear whether there is evidence and justification for this as none has been identified to date and the Parish are not aware of any.</p>
13	Gladman Developments	<p>Policy FRES1 – Housing Provision</p> <p>This Policy allocates two sites for housing and identifies a settlement boundary for Fressingfield, stating that land outside of this defined area will be protected unless there is an identified local need. Gladman object to the use of settlement boundaries if these preclude otherwise sustainable development from coming forward. The Framework is clear that sustainable development should proceed. Use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not</p>	<p>Settlement Boundaries are a common and widely used policy tool that defines where development is and is not acceptable. The existing Local Plan uses Settlement boundaries and the emerging Local Plan also defines settlement boundaries.</p>

	<p>accord with the positive approach to growth required by the Framework and is contrary to basic condition (a) and (d). As currently drafted, this is considered to be an overly restrictive approach and provides no flexibility to reflect the circumstances upon which the FNP is being prepared. Greater flexibility is required in this policy and Gladman suggest that additional sites adjacent to the settlement boundary should be considered as appropriate. Gladman recommend that the above policy is modified so that it allows for a degree of flexibility. The following wording is put forward for consideration:</p> <p>“When considering development proposals, the Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Neighbourhood Plan will be supported particularly where they provide:</p> <ul style="list-style-type: none"> • New homes including market and affordable housing; or • Opportunities for new business facilities through new or expanded premises; or • Infrastructure to ensure the continued vitality and viability of the neighbourhood area. • Development adjacent to the existing settlement will be permitted provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development.” <p>Indeed, this approach was taken in the examination of the Godmanchester Neighbourhood Plan. Paragraph 4.12 of the Examiner’s Report states: “...Policy GMC1 should be modified to state that “Development ...shall be focused within or adjoining the settlement boundary as identified in the plan.” It should be made clear that any new development should be either infill or of a minor or moderate scale, so that the local distinctiveness of the settlement is</p>	<p>Do not support the proposed wording as this would allow for unrestricted contrary to the sustainable development objectives of the NPPF.</p>
--	--	--

		<p>not compromised. PM2 should be made to achieve this flexibility and ensure regard is had to the NPPF and the promotion of sustainable development. PM2 is also needed to ensure that the GNP will be in general conformity with the aims for new housing development in the Core Strategy and align with similar aims in the emerging Local Plan.”</p> <p>Policy FRES2 – Housing size, type and tenure</p> <p>Whilst Gladman note the housing types proposed through this policy to accommodate a range of groups, particularly the elderly and the young, it should be recognised that housing needs do change over time. We suggest wording is added to the policy to allow flexibility for changing needs to ensure the Plan is able to respond positively to changes in circumstance which may arise over the plan period. Gladman suggest adding the wording ‘This should be evidenced through an up to date assessment’ to this policy.</p> <p>FRES6 – Protecting landscape character and natural assets and enhancing village gateways/entrances</p> <p>This policy identifies 4 views which the plan makers consider are important for the setting and character of Fressingfield and goes onto state that it would not support development proposals adversely affecting them. Identified views must be supported by evidence and ensure that they demonstrate a physical attribute elevating a view’s importance beyond simply being a nice view of open countryside. The evidence base to support the policy does little to indicate why these views are important and why they should be protected, other than providing a view of the settlement and surrounding fields and woodland. It therefore lacks the proportionate and robust evidence required by the PPG. Gladman consider that to be an important view that should be protected, it must have some form of additional quality that would ‘take it out of the ordinary’ rather than selecting views which may not have any landscape significance and are based solely on community support.</p>	<p>The housing types set out in FRES2 are preferences and would not necessarily exclude other types of housing from coming forward; it is accepted that housing needs will change over time.</p> <p>The views identified in this policy are not based solely on community support but also on evidence from the Character Appraisal and Appendix 2 of the Babergh – Mid Suffolk Heritage and Settlement Sensitivity Assessment (Final Report) March 2018.</p>
--	--	--	---

		<p>Gladman therefore suggests this element of the policy is deleted as it does not provide clarity and support for a decision maker to apply the policy predictably and with confidence. It is therefore contrary to paragraph 16(d) of the Framework.</p> <p>Conclusions</p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the FNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.</p> <p>Gladman is concerned that the plan in its current form does not comply with basic condition (a) in its conformity with national policy and guidance and is contrary to (d) the making of the order contributes to the achievement of sustainable development for the reasons set out above.</p>	
--	--	---	--