

STATEMENT OF CONSULTATION

Regulation 12 Town and Country Planning (Local Planning) (England) Regulations 2012

RURAL DEVELOPMENT & CORE STRATEGY POLICY CS11

(SUPPLEMENTARY PLANNING DOCUMENT)

July 2014

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Introduction

1. This document sets out how Babergh District Council involved the public in the preparation of the Supplementary Planning Document (SPD) on Rural Development & Core Strategy Policy CS11 in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community Involvement.
2. The regulations require that a SPD is accompanied by a consultation statement setting out the following:
 - Who was consulted regarding the SPD;
 - Summary of the main issues raised; and
 - How the issues have been addressed in the SPD.

Purpose of the SPD

3. The purpose of the SPD is to provide detailed guidance on the implementation of Policy CS11 of the Babergh Core Strategy (February 2014). Guidance is provided in terms of:
 - The geographic extent of the SPD
 - Discussion and consultation requirements for relevant planning applications
 - The criteria for assessment of relevant planning applications
 - Information required to support a relevant planning application
 - Future proposals for monitoring and review of the SPD

Who was consulted; how they were consulted and the Council's response to issues raised

4. The following external consultations were undertaken regarding the draft SPD:
 - Copies of the draft SPD, together with the Notice of Publication were published on the Council's website: <http://www.babergh.gov.uk/babergh/SPD> and made available for public inspection during normal office hours from the 21st May 2014 to the 24th June 2014 and from 7th July to 4 August 2014 at:
 - District Council Offices, Corks Lane, Hadleigh, IPSWICH, IP7 6SJ between the hours of 9.00am to 5pm from Monday to Thursday, and 9.00am – 4.30pm on Friday.

- Statutory consultees and general consultation bodies as set out in SCI received a letter or email informing them of the consultation on the draft SPD.

Main issues raised during the consultation and how the issues have been addressed in the SPD

5. Responses to the draft consultation document were received from 45 individuals / organisations (set out below), although it should also be noted that some stated that they had 'no comment' to make. Of those that did comment, Appendix 3 sets out the main points raised and the Council's responses to these:

LIST OF RESPONDENTS

- | | |
|------------------------------------|--------------------------------------|
| 1. Bramford PC | 24. Lord and Lady Hart of Chilton |
| 2. Greenright Homes | 25. P Ridgley Gray |
| 3. Chater Homes | 26. Chilton PC |
| 4. Assington PC | 27. Hartest PC |
| 5. Gt. Waldingfield PC | 28. Joseph Greenhow Planning Ltd |
| 6. Deborah Willingale | 29. Hadleigh Town Council |
| 7. Suffolk Preservation Society | 30. Pegasus Planning |
| 8. Newton PC | 31. Elaine Green |
| 9. Anglian Water | 32. Anthony Cotton |
| 10. Sproughton PC | 33. East Bergholt Society |
| 11. Braintree DC | 34. Suffolk CC |
| 12. Culver Evans | 35. Chelmondiston PC |
| 13. Clive Harris | 36. English Heritage |
| 14. Boyer Planning | 37. Glemsford PC |
| 15. Cockfield PC | 38. Natural England |
| 16. Polstead PC | 39. Palgrave PC |
| 17. Suffolk Dedham Vale Society | 40. Mendlesham PC |
| 18. East Bergholt PC | 41. Health and Safety Executive |
| 19. Bures St Mary PC | 42. Norfolk CC |
| 20. Lavenham PC | 43. Marine Management Organisation |
| 21. Country and Land Business Assn | 44. Pigeon Investment Management Ltd |
| 22. Brantham PC | 45. Persimmon Homes |
| 23. Bildeston PC | |

Appendix 1: Statement of Compliance with the SCI

Pre-Production	
Evidence gathering	Several meetings were held with officers in the Development Management and Strategic Housing Teams to gather information.
Production	
Town/ Parish Councils	Sent letters and emails to inform of consultation and where documents can be viewed.
Specific Statutory Consultees	Sent letters and emails to inform of consultation and where documents can be viewed.
General Consultees including Hard to Reach Groups	Sent letters and emails to inform of consultation and where documents can be viewed.
LEPs	Sent letters and emails where relevant to inform of consultation and where documents can be viewed.
General Public / All Others	Publish documents on website; sent letters to everyone on the BDF database to inform of consultation and where documents can be viewed.

Appendix 2: List of Consultation Bodies / Individuals

Notification of publication of the draft Rural Development & Core Strategy Policy CS11 SPD was sent to all Statutory, Non-Statutory and other consultees whose names appeared on the Council Local Plan Consultee Database (as at May 2014).

The list included:

Statutory Consultees:

Town & Parish Councils within Babergh district
Local Authorities, Town & Parish Councils adjoining the Babergh District
Anglian Water
English Heritage
Home Builders Federation
New Anglia Local Enterprise Partnership
Suffolk Constabulary
Suffolk County Council
Clinical Commissioning Groups and other NHS Trusts / Strategic Partnerships

Others:

Village Societies & Residents Groups
House-builders & Developers
The Gypsy Council
Business & Commerce
Individuals and Organisations wishing to be notified of future changes and/or new planning policy documents
Local Agents
Conservation and Environmental Groups
Planning Consultants / Chartered Surveyors

Appendix 3: Summary of issues raised at consultation and Council response

QUESTION	SUMMARY OF RESPONSES RECEIVED	OFFICER COMMENT
<p>Q1. Do you agree that the matters identified in paragraph 7 of the Draft SPD, which will act as the basis for assessing proposals, are relevant and appropriate?</p>	<p>Of those respondents that answered this question 66% agreed with the matters identified in the Draft SPD and 33% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> - The extent of cumulative impacts need to be agreed with the LPA as developers will not have full knowledge of other proposals - There is no specific mention of the wider environment/countryside - Existing conditions need to be taken into account when considering cumulative impacts - Regard should be given to policies and guidance contained within an Neighbourhood Plan - Changes that have taken place in the recent past should be considered - CS11 and CS15 fail to deal properly with the main legislative provisions for planning and the historic environment - The SPD will make the process for justifying and assessing a proposal repetitive and onerous. The SPD fails to provide new guidance beyond the Core Strategy and the NPPF - A key element missing from para. 7 is the requirement to deliver development on brownfield land - There is no mention of the sustainability of any proposed developments and the need to demonstrate that they are sustainable - The guidance should consider the issue of proportionality i.e what might be appropriate for a multi-dwelling application may not be appropriate for a single application. 	<p>It is accepted that there will need to be liaison between the LPA and developers on assessing cumulative impacts. This can take place during the pre-application discussions that are referred to in para.18 of the document.</p> <p>The wider environment/countryside is included within constraints and impacts which are referred to in para.15 of the document</p> <p>It is accepted that existing conditions will be the baseline for assessing the impact of additional development.</p> <p>It is accepted that there should be a reference to taking account of Neighbourhood Plans where these have been prepared in accordance with the Core Strategy.</p> <p>Changes that have taken place in the recent past are relevant insofar</p>

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		<p>as they might affect the ability of services and facilities to accommodate additional development. However the fact that a village may have experienced recent development is not, of itself, a reason for not considering further development</p> <p>CS11 and CS15 are part of the adopted Core Strategy which has been found sound by an independent Inspector and compliant with national policies and legislation.</p> <p>It is not accepted that the SPD provides no further guidance beyond the NPPF and the Core Strategy. It sets out further information on how the CS11 criteria will be applied and the evidence required to support applications.</p> <p>Sustainability issues and dealt with by Policy CS15. This is referred to in para. 6 of the document.</p> <p>It is accepted that there should be a reference to brownfield land and an amendment is proposed to para. 9 of the document to deal with this.</p> <p>It is also accepted that the level of evidence and information required</p>

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		to support an application should be proportionate to the scale of the proposal. An amendment is proposed to para. 19 to refer to this.
<p>Q2. Do you agree that the issues in relation to site location and relationship to settlement identified in paragraph 8 of the Draft SPD are relevant and appropriate?</p>	<p>Of those respondents that answered this question 69% agreed with the matters identified in the Draft SPD and 31% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> - Density should be included in the third bullet point - The fifth bullet point relating to self-containment and logical boundaries should be clarified - Please see 50-001-20140306 of the NPPG which does not restrict housing development to the type of rural settlement - Where villages have taken development early in the lifecycle of the policy they should be safeguarded by removing pressure to take further development in future years - Brownfield sites should be considered before greenfield sites - Locations adjoining the BUAB are not necessarily preferable to other locations outside the BUAB nor the least constrained. 	<p>Agree that density should be added to third bullet point</p> <p>It is considered that self-containment and natural boundaries and self-explanatory Policy CS11 relates to Core and Hinterland Villages. It does not restrict housing development in other villages. These are covered by other policies in the Core Strategy.</p> <p>The level of development that has taken place in a village is relevant insofar as it may affect the capacity of services and facilities to accommodate development. It is not possible to give safeguards to prevent development in future years.</p> <p>The availability of brownfield sites would be considered as part of the sequential approach referred to in para. 9 of the document and an amendment is proposed to this paragraph to refer to this..</p>

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		<p>If a site adjoining a BUAB has particular constraints then this will be taken into account. These are referred to in para. 15 of the document.</p>
<p>Q3. Do you agree with the sequential approach set out in paragraph 9 of the Draft SPD?</p>	<p>Of those respondents that answered this question 56% agreed with the matters identified in the Draft SPD and 44% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> - Any other sites should be deliverable as well as available and suitable - Add to end of 3rd bullet point “or easily accessible from the parent village” - The use of the BUAB as a starting point for expansion is unfortunate. Up to now it has been a line that should not be crossed - Stages 2 and 3 should be combined removing any preference for sites adjoining the BUAB - Priority should be given to developing brownfield sites that are well related to the built-up area of a Core Village and have good access to local facilities and services - There should be greater flexibility to allow more innovative approaches. - The sequential approach should not be overly stringent. 	<p>Agree that “deliverable” should be added to the first bullet point.</p> <p>Agree to add “or easily accessible from the parent village” to the 3rd bullet point</p> <p>The purpose of CS11 is to introduce a more flexible approach to development for Core and Hinterland Villages, including consideration of proposals outside existing BUABs</p> <p>It is not accepted that sites that do not adjoin existing BUABs should be considered on an equal basis to those that do. Sites that adjoin existing BUABs are more likely to form a natural extension to the village.</p> <p>It is accepted that there should be a reference to brownfield sites in para. 9 and an amendment is proposed.</p> <p>The approach of ‘having regard to’ the sequential approach is considered sufficiently flexible and the paragraph has been amended</p>

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		to 'have regard to the sequential approach and other relevant material considerations.'
<p>Q4. Do you agree with the approach to assessing the scale of the proposal as set out in paragraph 10 of the Draft SPD?</p>	<p>Of those respondents that answered this question 76% agreed with the matters identified in the Draft SPD and 24% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> - The reference to the requirement for 1050 dwellings should be clarified - The 1050 houses should not be regarded as a ceiling on development as housing numbers should be expressed as a minimum - The last sentence of para 10 should be amended to read “.. demonstrate that the development can be accommodated without adversely affecting the character of the village and that the services, facilities and infrastructure have the capacity to accommodate it or will be enhanced to accommodate it” - You should use a % identification of the number of units that would be appropriate for each settlement. 20% for each rural settlement would be appropriate so that regardless of size, the eg: 10 unit hamlet can absorb an additional 2 units to help elderly people to downsize or young families to access a home. Your design policies are the safeguard in terms of enabling appropriate development that adds rather than detracts from visual amenity. - In determining whether the scale of development is appropriate to a village/functional cluster reference should also be made to the SHMA and other evidence base documents which are periodically updated to provide a contemporary assessment of housing needs - In terms of assessing the scale and size of a proposal the scale of the developable area in comparison to the settlement should also be a key consideration alongside the proposed number of dwellings - The scale of growth does not need to be proportionate if the community wish to accommodate levels of growth above this. 	<p>Agree that further explanation and clarification of the requirement for 1050 dwellings should be given.</p> <p>Agree that the last sentence of para. 10 should be amended as suggested</p> <p>The majority view is that the approach outlined in the document is appropriate and specific numbers or percentages should not be applied.</p> <p>It is accepted that proposals should reflect up to date housing needs. This is referred to in para 12 of the document.</p> <p>Proportionality is already covered in para.10</p> <p>In accordance with the NPPF (para 14) there is a presumption in favour of sustainable development unless there is significant and demonstrable harm.</p> <p>Disproportionate level of growth would be harmful and would not accord with policy requirements.</p>

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<p>Q5. Should paragraph 10 specify an upper limit for the number of dwellings that can be permitted on any one site under this policy?</p> <p>If yes, what should that limit be (please state whether your response refers to Core Villages or Hinterland Villages or both)?</p>	<p>Of those respondents that considered upper limits should be specified a number of different suggestions were made including:</p> <p>50 for Core Villages 15-20 Hinterland Villages</p> <p>10 for Core Villages per planning application 5 for hinterland villages per planning application</p> <p>3 for hinterland villages</p> <p>A 20% increase per rural settlement as a global figure</p> <p>In both cases the limit should be set on the basis of a small percentage (low single figures: eg: 1-5%) of existing settlement size with an added weighting reducing the limit to reflect existing services.</p> <p>2% for hinterland villages 5% for Core Villages</p> <p>10% for both Core and Hinterland Villages</p>	<p>Although a number of suggestions were made about limits to development the majority view was that the approach outlined in the document is appropriate and therefore it is not proposed to include upper limits in either Core or Hinterland Villages.</p>
<p>Q6. Do you agree with the approach to assessing the cumulative</p>	<p>Of those respondents that answered this question 67% agreed with the matters identified in the Draft SPD and 33% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> - Any development proposals should take into account the cumulative effect on nearby 	<p>Agree to add a reference to other nearby villages and neighbouring local authority areas</p> <p>Agree to add “deliverable” to para. 9</p> <p>The amount of development that</p>

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<p>impact of proposals as set out in paragraph 11 of the Draft SPD?</p>	<p>villages and neighbouring local authority areas, not just the effect on the functional cluster of villages in Babergh District</p> <ul style="list-style-type: none"> - As in question 3 this relates back to whether or not existing commitments and other proposals are deliverable - The effect of recent development in a village should be considered as part of the cumulative effect - Existing conditions should be considered when assessing impacts - Add landscape impact - Paragraph 11 should be amended to reference the need to provide new infrastructure, subject to the overall viability of the scheme 	<p>has taken place in the recent past is relevant insofar as it might affect the ability of services and facilities to accommodate additional development. However the fact that a village may have experienced recent development is not, of itself, a reason for not considering further development. Existing conditions will act as a baseline for assessing impacts of additional development. Landscape impact is covered in para.15. It is accepted that there should be a reference to viability and an amendment is proposed to para. 10</p>
<p>Q7. Do you agree that the constraints and impacts identified in paragraph 15 are relevant and appropriate?</p>	<p>Of those respondents that answered this question 72% agreed with the matters identified in the Draft SPD and 28% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> - They do not give sufficient protection to the majority of the countryside in Hinterland Parish boundaries which has no specific designation or to houses and buildings which form the character of a place despite not being listed - The impact on heritage assets should include the impact of development within their setting (NPPF para.132) 	<p>Agree that references to setting, non-designated heritage assets, nationally and locally designated areas and contamination should be made Infrastructure is referred to in para. 10 of the document</p>

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	<ul style="list-style-type: none"> - The impact of development on non-designated heritage assets should also be included (NPPF para. 135) - The impact on designated landscape areas should clarify that this applies to both nationally and locally designated areas - Contamination issues should also be identified as a potential constraint. - The Draft SPD does not add anything significant to what is already stated in the NPPF and the Development Plan - The constraints should include impact of any loss of amenity to current residents/community and the impact upon the quality of life of current residents/community - Proposals also need to have regard to the infrastructure of the area as a whole e.g. road systems, water availability 	
<p>Q8. Do you agree that the matters identified in the Assessment Checklist at Appendix 4 of the Draft SPD are relevant and appropriate?</p>	<p>Of those respondents that answered this question 55% agreed with the matters identified in the Draft SPD and 45% disagreed.</p> <p>The main issues raised by those disagreeing were:</p> <ul style="list-style-type: none"> - A reference to the natural environment is needed - Need to add 'will the proposal have an impact on' : un-designated heritage assets and the setting of all heritage assets - Under 'Are there any known capacity issues' include 'public highway' - Make it clear that development sites have to be located within the administrative boundary for Babergh. - Frequency of bus routes should also take into account the location of the bus stop and whether or not the stop is marked and is accessible to a hard surfaced footway. Also the reliability of the service and whether the buses which operate are accessible by people with disabilities, the elderly and young children. - It is unclear if the "check List" is for developers to complete, alongside a written 	<p>Criteria relating to the natural environment are already included</p> <p>Agree to add setting of heritage assets</p> <p>Agree to add public highway to capacity issues</p> <p>Agree to add a new para. In document relating to the application of the policy</p> <p>Distance from site to public transport is already included</p> <p>Agree that the purpose of the checklist should be clarified</p> <p>Questions 3 and 4 deal with different matters.</p> <p>Do not agree that the reference to proportionate increase should be</p>

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	<p>statement, or if this is for the Local Authority to assess a developer’s written statement.</p> <ul style="list-style-type: none"> - Question 3 and 4 are similar, and it would be sufficient with just Question 4. - Question 6 relates to figures, and specifically a percentage. The second part of Question 6 “...and what proportionate increase will this be in the number of dwellings in the village?” should be removed. - With regards to Question 17, the text “what is the severity of that impact?” should also be removed as this is subjective. - The checklist needs to have added to it in the question “Will the proposal have an impact on any heritage asset, conservation area, listed building, site of archaeological importance.” <p>The additional types of heritage assets need to be added as they are omitted but are designated heritage assets namely:</p> <ul style="list-style-type: none"> • “registered park and gardens • registered battle fields • scheduled monuments • protected wreck sites • non-designated heritage assets or locally listed assets.” <ul style="list-style-type: none"> - The checklist asks what social benefits and what economic benefits does the proposal provide but fails to ask what environmental benefits does the proposal provide. The NPPF treats social economic and environmental issues equally and this checklist should adopt the same approach. - Consideration should be given to the level of information that should be provided within outline applications for example in relation to the final mix of market housing - The role of Appendix 4 needs clarity - Appendix 4 should include an additional field relating to previously developed land - The list should include a reference to phasing - The assessment checklist should consider proportionality i.e. the level of detail 	<p>removed</p> <p>Agree to remove “severity of impact” as being subjective</p> <p>Agree to add list of other heritage assets</p> <p>Agree to add environmental benefits</p> <p>Agree to add a reference in the document that the level of detail required should be proportionate to the number of dwellings proposed and the type of application</p> <p>Agree to add brownfield land to the checklist</p> <p>AONB is covered by the reference to designated areas of landscape importance.</p>

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	<p>required to support an application should be related to the number of dwellings proposed.</p> <ul style="list-style-type: none"> - AONB or adjacent to AONB should be added 	
<p>Q9. Do you have any other comments on the Draft SPD?</p>	<p>Nearly all respondents provided additional comments. Some comments were related to specific settlements or sites. As the SPD is not location specific it is not appropriate to refer individual settlements or sites. This summary therefore only includes reference to general points made on the document not covered by the previous questions.</p> <p>The main points made were:</p> <ul style="list-style-type: none"> - Para 8 site allocation It is not democratic to allow expansion beyond settlement boundaries/built up area boundaries without going through the accepted procedure of public consultation on a site allocations document. - Para 12 local needs An interpretation of this paragraph is that the analysis of housing need may be carried out by the developer, but it would have to be in consultation with Babergh and the village in order for the conclusions to be justifiable. - Paragraph 19. The information to be submitted should accord with the Council's published Local Validation List. This extensive list of additional information required runs contrary to the Government's wishes to simplify and reduce the amount of information to be submitted with planning applications. - The information to be submitted in support of an application should be proportionate 	<p>Policy CS11 forms part of the adopted Development Plan and the flexibility that it provides to consider sites beyond existing BUABs has been established through a democratic process.</p> <p>Agree that further explanation of how the local needs will be assessed should be included in para.12</p> <p>The information to be submitted should be included in the Planning Statement which is one of the Council's validation requirements</p>

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	<p>to the scale of development proposed</p> <ul style="list-style-type: none"> - Para. 13: currently this requires all new footpath connections between new housing and services to be lit. The decision on appropriate lighting should be taken at the application stage as it may be contrary to: <ul style="list-style-type: none"> •NPPF para. 125 which requires that decisions should not impact on local amenity or intrinsically dark landscapes, •NPPG guidance: Light Pollution para 001 which states that artificial light is not always necessary, and •2006 Defra good practice guidance on Lighting in the Countryside which states that the process of preparing a lighting scheme should begin with an assessment of the need for the lighting. - Appendix 1 of the draft CS11 SPD lists Sproughton as a Hinterland Village However, the LDF has also policy CS1 in which part of Sproughton is identified as an edge of urban area included in the Babergh Ipswich Fringe as Policy CS5.It is therefore not clear how the LPA will consider development in Sproughton. - Paragraph 13 – Suggest including text to make it clear that the walking distances are not “as the crow flies” and have to take into account local circumstances not just gradient (i.e rivers, main roads and other potential constraints), it may also be worth making sure that access to sites could not be compromised by potential flooding; - Map 4 Appendix 5 – After “Villages listed in italics are outside Babergh” add the text “and are not subject to this SPD.”. Also remove both Borley and Alphamstone from the map as these a very small hamlets and development would not be encourage in these locations by Braintree District Council; - Appendix 3 page 15 last paragraph, typo correction needed on ANOB , also I would suggest including Scheduled Ancient Monuments after conservation areas. - -With regards to paragraph 19 we are in agreement with the point which states there should be the inclusion of “a statement demonstrating how the proposal will help to meet local needs for market housing, affordable housing and community needs and 	<p>Agreed. An amendment is proposed.</p> <p>Agree to remove reference to “lit” CS11 applies to the village of Sproughton and not the area of the Parish which forms part of the Ipswich fringe</p> <p>Agree to refer to actual distances A new para. on the application of the policy is proposed which will refer to this.</p> <p>Noted</p> <p>An amendment is proposed to para. 12</p>

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	<p>justifying the type and mix of housing.” This appears to be a reasonable requirement from developers, however it should not be a requirement for developers to provide this data and evidence of market need, therefore it should only be a requirement to include a statement of how the development meets these needs. We object to the current wording of paragraph 12 and the onus being put upon developers to provide an assessment of local housing need. The lpa should provide this information. Assessments should be undertaken subject to the availability of information readily available from the LPA.</p> <ul style="list-style-type: none"> - We believe that the criteria detailed in paragraph 13 are too restrictive for a rural situation. Surely sustainable features can be considered to be available beyond these distances. - Para 7 Availability of Services and Facilities. As worded the document would allow any development to be turned down in a hinterland village where there was no Doctor's Surgery. This too restrictive. It should only require access within a functional cluster. - Para 13 Lighting of connecting paths from development to the main village. This is plain wrong. Lighting, which all the evidence shows actually increases crime, should be actively discouraged, not required. - The first two preferences for location of development in para. 9 should be reversed so as to avoid continuing infill of the village and historic green spaces, destruction of historic village street scenes, and raising the density of current housing to adverse effect of the current village. - Para 18: it should be a condition that the local consultation must involve the Parish Council and environmental groups including Transition groups as part of the Pre-application process before an application is submitted. - As it applies to Core Villages no value is placed on Neighbourhood Plans in either CS11 or the SPD. NPs follow an evidence based process following engagement with the local community. The value and the democratic nature of any NP must be supported by the planning process and the Local Planning Authority. The SPD therefore requires an overarching statement underscoring the value placed on any NP and the need to take 	<p>The distances are based on national guidance</p> <p>Policy not applicable, these villages are outside of Babergh</p> <p>An amendment is proposed to para. 13.</p> <p>Open spaces etc within existing villages are protected by other policies in the Development Plan....</p> <p>Agree to strengthen para. 18 in relation to the requirements for consultation and community engagement</p> <p>Agree that the guidance should include a reference to the role of Parish and Neighbourhood Plans</p>

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	<p>full cognizance of them whether they be in process and/or Made. This will also reduce the avoidance of any doubt in the mind of any developer.</p> <ul style="list-style-type: none"> - The planning balance judgement needs also to take into account the statutory duties upon LPAs under the legislation already referred to in the answer to Q1. Accordingly it is not just NPPF guidance that needs to be referred to. - Pre-application discussion and consultation. The council should “require” not “expect” developers and landowners to carry out local consultation. This paragraph should spell out that local consultation should be with the parish council and the local community affected. The statement dealing with the consultation that has also taken place should we suggest include also “the means by which the consultation has taken place over what period and what issues raised by the community have not been addressed by the proposal”. - The approach set out in CS11 makes it difficult to quantify the amount of development that is likely to come forward in each settlement. This makes assessment of cumulative impacts very difficult. For some types of infrastructure, notably education, this makes it harder to determine where necessary new school place provision should be made - Para 7 Add “Availability of services and facilities, their ability to expand and the contribution which development would make to their long-term viability - Para 8 Amend bullet point to read “How the site is connected to the existing settlement’s jobs, facilities and services, including location of site access and availability of sustainable transport links - Para 20 – consideration should be given to time. Development which may seem incongruous until landscaping or amenity is established (c.10 years) should be considered in the context of the time the built aspects will be standing. - The requirements of the SPD are too onerous 	<p>Agree to add “all relevant policies and legislation”</p> <p>Agree that para. 18 should be strengthened.</p> <p>It is accepted that it is one of the implications of the policy that it will be difficult to quantify the amount of development that will come forward in each settlement</p> <p>Agreed</p> <p>Agreed</p> <p>Disagree. A high standard of design is required and development that is incongruous does not accord with policy.</p> <p>The SPD requirements conform to policy and application will be proportionate</p>