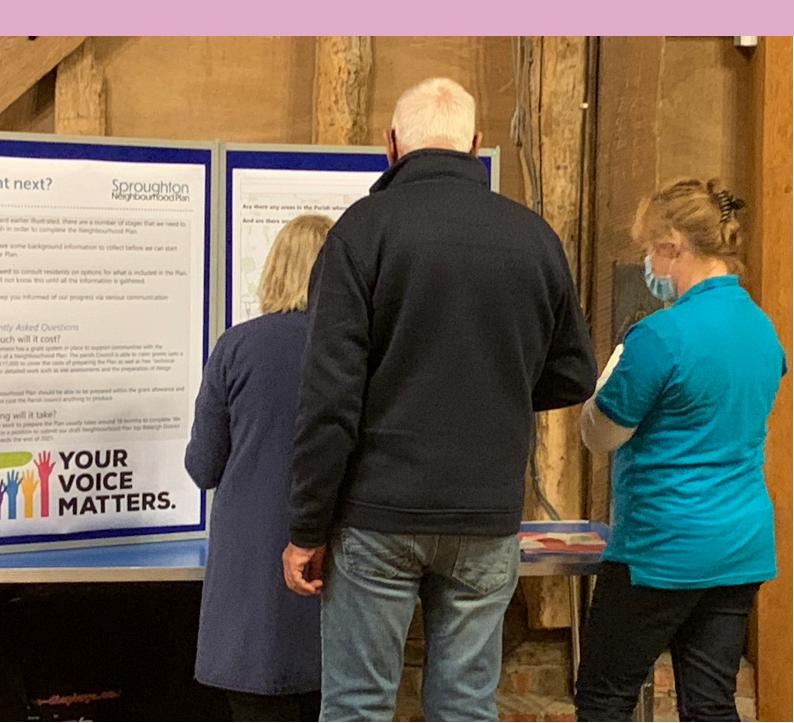
SPROUGHTON NEIGHBOURHOOD PLAN 2018-2037

Consultation Statement

Sproughton Parish Council September 2022



Prepared for Sproughton Parish Council by Places4People Planning Consultancy

PLACES4PEOPLE

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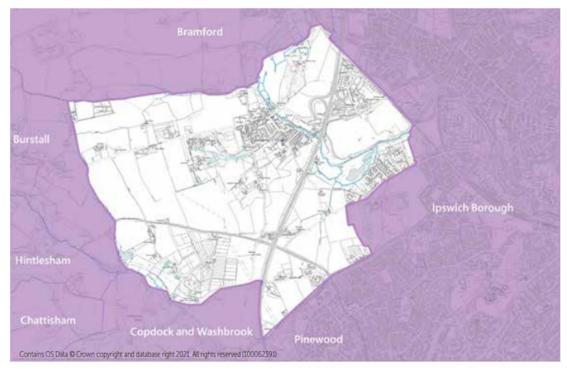
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1. Introduction

- 1.1 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Sproughton Neighbourhood Plan.
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
 - contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan
 - explain how they were consulted
 - summarise the main issues and concerns raised by the persons consulted
 - describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
- 1.3 The policies contained in the Neighbourhood Plan are the culmination of extensive engagement and consultation with residents of Sproughton parish as well as other statutory bodies. This has included a household survey and consultation events at appropriate stages during the preparation of the Plan.

2. Background to the Preparation of the Neighbourhood Plan

- 2.1 At the Sproughton Parish Council public meeting on 15 January 2020 the council formally agreed to start the process of creating a Neighbourhood Plan for Sproughton. The creation of the Neighbourhood Plan Sub-Committee (SNPSC) was agreed at the Parish Council meeting of 26th February 2020. It was agreed that the SNPSC would report into the planning committee.
- 2.2 On 16 April 2020, in accordance with the Neighbourhood Planning Regulations, Babergh District Council formally designated the whole of Sproughton parish, as illustrated on Map 1, as a Neighbourhood Plan Area. Details of the application, publication and designation can be viewed on the district council's website under Neighbourhood Planning in Sproughton. There are no other designated neighbourhood plan areas within this boundary and the Parish Council is the "qualifying body" responsible for the preparation of the neighbourhood plan for this area.
- 2.3 This draft Neighbourhood Plan has been prepared by the Neighbourhood Plan Subcommittee (SNPSC) on behalf of Sproughton Parish Council which is the "qualifying body" as defined by the Localism Act 2011. The Parish Council has approved it for public consultation.



Map 1 - The Neighbourhood Plan Area

3. How the plan was prepared

- 3.1 The Neighbourhood Plan has been prepared in accordance with the requirements of the Government's Neighbourhood Planning Regulations and has involved considerable local community engagement to gather evidence for the content of the plan and later inform the plan's direction and policies. The content of the Neighbourhood Plan has been generated and led by the community and shaped by results of surveys and drop-in events, to ensure that the Neighbourhood Plan reflects the aspirations of the community.
- 3.2 The Parish Council voted unanimously in support, and the creation of the Neighbourhood Plan Sub-Committee (SNPSC) was agreed at the Parish Council meeting of 26th February 2020. Rhona Jermyn agreed to chair the Sproughton Neighbourhood Plan Sub-Committee pending approval by the Parish Council, and a collaboration of parish councillors and parishioners agreed to take part.

Evidence gathering

- 3.3 The Plan has been developed through extensive community consultation and is based on sound research and evidence. The evidence base was informed by parish council commissioned studies and surveys, namely:
 - a parish-wide questionnaire seeking the views of residents as to their aspirations for the village and their preferences regarding future development
 - a landscape character appraisal that identified the important qualities and assets of the parish that need protecting (Alison Farmer Associates)
 - a design guide for the parish and, in particular, how a proposed development site could be developed
 - a Site Options and Assessment Report (AECOM May 2021) of all sites submitted to Babergh through the Strategic Housing and Employment Land Availability Assessment process (SHELAA) and those submitted as a result of our own 'call for sites' within the village/parish
 - a Housing Needs Assessment (AECOM October 2020) to collate the statistical data on requirements for the parish, district and county comparing to nationwide trends, including tenure and affordability; and type and size.
- 3.4 The results and conclusions of this work, which is published on the Neighbourhood Plan pages of the Parish Council's website, have informed the preparation of the planning policies in this Plan.
- 3.5 As a part of the community engagement process an introductory letter and a comprehensive Household Survey questionnaire were delivered during July 2020 to all residents of the parish aged 16 and over. In most cases, the completed questionnaires were returned or collected two weeks after they were delivered. In view of the restraints imposed by the Covid-19 pandemic, some returns were accepted after the end of the two-week period. In all we achieved a 35% return rate. The questionnaire can be viewed on the Neighbourhood Plan pages of the Parish Council's website.
- 3.6 The questionnaires were totally anonymous, other than a post code, and were analysed using google forms that provided the analytics to produce the results in a large spreadsheet and the ability to produce graphs and bar charts.

3.7 A public exhibition was held at Sproughton Tithe Barn on 4-6 September 2020. The exhibition explained the overall Neighbourhood Plan preparation process and summarised the findings of the household survey. Members of the SNPSC were on hand throughout to discuss the findings with members of the local community. In all, 98 people from Sproughton and the immediate area attended the exhibition.

Ongoing publicity and community engagement

- 3.8 During the whole neighbourhood plan process, there has been regular publicity, awareness raising and community engagement, including:
 - Neighbourhood Plan notice board by the Tithe Barn, Lower Street.
 - regular posting on social media
 - leaflets at the village shop
 - advertising in the In Touch local magazine
 - flyers delivered to households in the parish
- 3.9 There have been regular updates at Parish Council meetings and events have been publicised by the distribution of leaflets throughout the parish and on the Parish Council website.

Steering Committee Meetings

3.10 The Sproughton Neighbourhood Sub-committee has met on a regular basis and notes of all meetings are available on the Neighbourhood Plan website.



4. **Regulation 14 Pre-submission Consultation**

4.1 On 1 September 2021 the formal pre-Submission Draft Plan was approved for publication by the Parish Council. The statutory consultation commenced on Pre-Submission Consultation on Draft Neighbourhood Plan and ran for six weeks from 2 October 2021 to 15 November 2021 (inclusive).

How we publicised the consultation

4.2 In order to ensure that all residents and others operating in the Neighbourhood Area were aware of the consultation, a leaflet publicising the consultation and a drop-in event to launch the consultation was distributed to all households and known businesses in the Parish. The drop-in event was held at the Tithe Barn on 2 October 2021 and the display boards from the event are reproduced at Appendix 1.

SPROUGHTON NEIGHBOURHOOD PLAN

Pre-Submission Consultation Plan

sproughton Parish Council September 2021



- 4.3 Further drop-in events were held at the Tithe Barn on:
 - 2 October 10am 3pm
 - 16 & 17 October 10am -3pm
 - 21 October 7-9pm (Question and Answer session
- 4.4 At the start of the consultation, all the statutory Regulation 14 consultees, as advised by Babergh District Council, were consulted. The full list of bodies consulted is shown in Appendix 2 and the letter used to notify them is included at Appendix 3
- 4.4 The Plan was made available on the Neighbourhood Plan pages of the Parish Council website together with the supporting documents that had been prepared to inform the content of the Plan. Comments forms were also available for downloading and an online version was also available and residents were encouraged to comment online.
- 4.5 Details of the responses received during the pre-submission consultation period are detailed later in this Consultation Statement.

5. **Pre-Submission Consultation Responses**

5.1 Individuals and organisations that responded to the Pre-Submission Consultation are listed below.

B Hunt	H Wood
C Fuller	J Pateman-Gee
C Harris	J Tuppen
C Taylor	JTuppen Davies
D Taylor	J Webb
Dr Hoque	K Athroll
G Armstrong	M Levett
H Davies	P Powell
H Mitchell	P Wood

R Hardacre S Catermole S Lavington S Marquess S Maxwell V Durrant V Scott Gray

Armstrong Rigg Planning on behalf of Hopkins Homes Avison Young on behalf of National Grid Babergh District Council Boyer on behalf of Taylor Wimpey UK Ltd Ipswich Borough Council National Highways (former, Highways England) Natural England Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust Suffolk County Council Suffolk Wildlife Trust Water Management Alliance on behalf of East Suffolk Drainage Board

5.2 A summary of responses to the consultation questions is contained in Appendix 4 and the schedule of all comments received (as submitted) and the responses of the Parish Council are set out in Appendix 5 of this Statement. As a result, the Submission version of the Neighbourhood Plan has been appropriately amended as identified in the "changes made to Plan" column of the Appendix. Further amendments were made to the Plan to bring it up-to-date. Appendix 6 provides a comprehensive list of all the modifications to the Pre-Submission Plan following consultation.

6. Topic Specific Focused Consultation

- 6.1 The Neighbourhood Plan designates Local Green Spaces and Buildings of Local Significance. In order to ensure that owners/occupiers of theses premises were aware of the proposal, focused and targeted consultation took place between the Pre-Submission Consultation and the Submission of the Plan.
- 6.2 For the Buildings of Local Significance, the letter in Appendix 7 was hand delivered to occupants together with the description of the building in the Appraisal of Non-Designated Heritage Assets. They were given between 13 May and 12 June 2022 to respond.
- 6.3 For the Local Green Spaces, the letter in Appendix 8 was sent to the known owners of the designated areas. Again, they were given between 13 May and 12 June 2022 to respond.

Appendix 1 – Regulation 14 Consultation Drop-in Event Display

Welcome

The story so far

Since January 2020 a Parish Council Sub-Committee, with the assistance of a local Planning Consultancy and Government financial support, has been preparing a Neighbourhood Plan for our parish.

During this time we've conducted household surveys, commissioned specialist studies and provided regular feedback to residents.

We've now reached a major milestone and are commencing consultation on the Draft Plan. Consultation lasts until Monday 15 November, a period of 6 weeks.

What is a Neighbourhood Plan?

It is a new kind of planning document designed to allow local people to play an active part in planning their area. It can guide the development and conservation of the village. It

can, for example, also identify proposals for: • Improving areas;

- Providing new facilities;
- Sites for new development;
- Protecting sites of environmental or historic quality.

When complete, it will form part of the statutory development plan for the area, meaning Babergh District Council and Planning Inspectors will have to take note of what it says when considering development proposals.

Community involvement is a major part of the process of developing a Neighbourhood Plan and it must be approved in a local referendum before it can be used.

Over the next 6 weeks you have an opportunity to read the Plan and submit your comments.

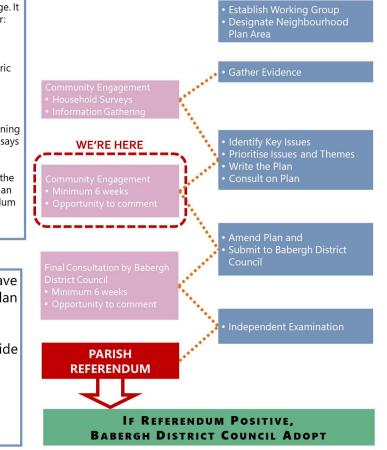
The boards that follow provide information about the Plan.

WE NEED YOUR VIEWS BY 15 NOVEMBER

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How it is prepared?

There are a number of stages that have to be completed, as illustrated. Some of these stages are governed by the regulations for preparing neighbourhood plans and so there is no short cut.



The Draft Plan

Plan Contents

The Plan itself is a large document and necessarily quite complex in places as it will be used to decide whether planning applications should be approved.

Based on the issues identified during the initial stages of preparing the Neighbourhood Plan, the following themes have been identified but would urge you to view the Plan as a whole.

- Housing
- Business and Employment
- Natural Environment
- Historic Environment
- Development Design
- Infrastructure, Services and Facilities
- Highways and Movement

The Plan contains:

Planning Policies

These will be used to supplement the Local Plan when decisions on planning applications are made.

Policies Maps

These illustrate areas of land or buildings where policies in the Plan apply.

Community Actions

Local initiatives to address non-planning matters and concerns raised in the Household Survey.



Neighbourhood Plans cannot contradict the main government planning policies or the strategic policies in the Local Plan for the area. For example, they cannot propose less development than is planned for in the adopted Local Plan.

Board 2

WE ESPECIALLY WANT YOUR COMMENTS ON THE PLANNING POLICIES

PLEASE COMMENT, EVEN IF YOU SUPPORT THE PLAN

A Vision for Sproughton

In 2037 Sproughton will be a thriving, safe parish that will have balanced the provision of housing growth with the need to maintain and enhance its special character, historic landscape and environment and ensuring that the needs of existing and future residents and businesses are respected.

The Vision is translated into topic based Objectives that have informed the detailed content of the Plan

Housing Objectives

- To maintain a strong community by ensuring an adequate supply and mix of housing types and the integration between different types and tenures of housing within the parish.
- 2 To enable local people to stay in or return to the village throughout their lifetime and as their needs change.

Business and Employment Objectives

- 3 To support small-scale business creation and retention.
- 4 To encourage the provision of services and infrastructure that enables business development.
- 5 To ensure that the employment sector engages with the community with regard to business and employment developments.
- 6 To encourage opportunities for home working and local employment, particularly through having a fast, reliable fibre broadband network for all.

Natural Environment Objectives

- 7 To minimise the impact of development on the best and most versatile agricultural land.
- 8 To protect and enhance biodiversity, wildlife habitat and wildlife corridors.
- 9 To maintain the village's rural landscape setting, the distinctive views and visual connectivity with the surrounding countryside from within the built-up area.
- 10 To protect the identity of the present parish and prevent coalescence with Ipswich and surrounding villages.
- 11 To protect open green spaces, woodland, countryside, mature trees and ancient hedgerows.

Historic Environment Objectives

- 12 To conserve and enhance the heritage assets and their settings.
- 13 To protect and improve the features which contribute to the historic character.

Development Design Objectives

- 14 To reduce the environmental impact of new buildings.
- 15 To ensure development complements and enhances the diverse character of the parish.
- 16 To ensure new development is of a high-quality design, eco-friendly, 'fit for life' and of a scale (size/height) and type that reinforces local character.

Infrastructure, Services and Facilities Objectives

- 17 To improve and sustain high quality local facilities for existing and future residents.
- 18 To protect existing community, retail, education, and leisure facilities and support further growth where appropriate.
- 19 To ensure that sufficient community and leisure facilities are maintained to serve the needs of all sectors of the community including new complementary provision in association with new development.

Transport Objectives

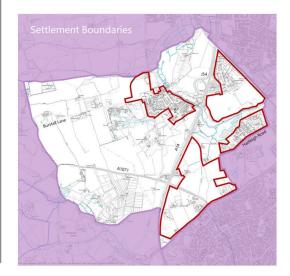
- 20 To promote measures to improve the safety of the roads and footways through the parish.
- 21 To maintain, develop and enhance cycle routes through the parish.
- 22 To ensure that new development provides sufficient off-street parking.
- 23 To minimise the impact of future development within the parish on the existing local highway network.
- 24 To encourage sustainable travel modes, including public transport.

DO YOU SUPPORT THE VISION AND OBJECTIVES?

Planning Strategy

Location of development

- A new Local Plan for Babergh and Mid Suffolk is at an advanced stage of preparation.
- For Sproughton, it defines "Settlement Boundaries" around the main built-up areas of the parish, including the main employment sites, outside of which proposals for new development will only be permitted in exceptional and specified circumstances.
- The emerging Local Plan identifies sites for housing-led development, primarily at Wolsey Grange and Wolsey Grange 2.
- The Neighbourhood Plan cannot plan for less development than specified in the Local Plan.
- However, the emerging Local Plan identifies a site for development east of Loraine Way that was recently refused planning permission and turned down at appeal. Given the uncertainty about the potential to develop this site, it has not been included in the Neighbourhood Plan.



POLICY SPTN1 – PLANNING STRATEGY

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he Neighbourhood Plan area will accommodate development commensurate with Sproughton's position in the district's Settlement Hierarchy.

Settlement Boundaries, as defined on the Policies Map, identify the extent of land which is required to meet the development needs of the parish.

Proposals for development located outside the Settlement Boundary will only be permitted where they are in accordance with national and district level policies.

DO YOU SUPPORT THIS POLICY?

Housing

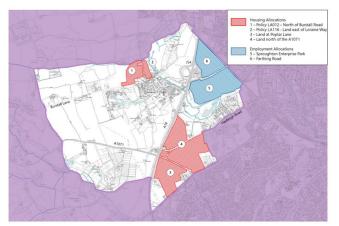
The emerging Joint Local Plan (November 2020) identifies a requirement for at least 1,514 additional new homes in the parish between 1 April 2018 and 2037.

This total comprises planning permissions for 84 homes that had not been completed as of 1 April 2018 and sites that the Joint Local Plan allocates for development as illustrated on the map. Whether all these sites remain in the final Joint Local Plan is a matter for a Government appointed Planning Inspector.

The Neighbourhood Plan:

- does not allocate any new sites for housing
- Places an emphasis on providing three bedroomed homes in the new developments already identified
- Allows for the potential to deliver affordable housing to meet the specific needs of Sproughton residents that need to live here.

Joint Local Plan Policy	Location	Total	Status as of 1 September 2021
LA012	Land North of Burstall Lane and West of Loraine Way (B1113)	105	Babergh District Council resolved to approve a planning application for 105 homes in October 2020. The decision has yet to be issued.
LA013	Land North of the A1071	800	An outline planning application has been submitted to Babergh District Council.
LA014	Land at Poplar Lane	475	Planning permission for this development was granted in August 2018 and the site is under construction.
LA116	Land East of Loraine Way (B1113)	50	A planning application for development on this site was refused in May 2020 and a subsequent appeal was dismissed by an inspector appointed by the Secretary of State in December 2020.
	Total Allocated Sites	1,430	
	Outstanding uncompleted planning permissions at 1 April 2018	84	Many of these will now have been completed.
	Overall Total	1,514	



Emerging Joint Local Plan (Nov 2020) allocated sites and their status - January 2021

DO YOU SUPPORT THIS POLICY?

Policy SPTN 2 – Housing Mix

n all housing developments of ten or more homes, there shall be an emphasis on providing a higher proportion of three-bedroomed homes within the scheme, unless it can be demonstrated that: -

- a) the particular circumstances relating to the tenure of the housing dictate otherwise; or
- b) the latest publicly available housing needs information for the Plan area identify a need for a different mix.

The provision of bungalows will also be supported where the proposal would not have a detrimental impact on the character of the area in the vicinity of the site.

Proposals that include affordable housing will be required to ensure that:

- it is designed so that it is 'tenure blind' (so that it is indistinguishable from open market housing) either on site or, where schemes do not include onsite open market housing, the wider area; and
- ii. where appropriate, small clusters of affordable housing are distributed around the larger site and indistinguishable from the housing mix.

Boay

Housing

One way of delivering affordable housing for local people is through an "exception site" scheme. These are sites outside the Settlement Boundary where a Parish Council and a Housing Association work together to identify a need and a suitable site and funding to deliver a scheme.

Such housing would be aimed at local people and the affordable housing would remain in that use.

The policy in the Neighbourhood Plan would enable such housing to be delivered should a need



Policy SPTN 3 – Affordable Housing on Rural Exception Sites Proposals for the development of small-scale affordable housing schemes, including entry level homes for purchase (as defined by paragraph 78 of the NPPF) on rural exception sites outside the settlement boundary, where housing would not normally be permitted by other policies, will be supported where there is a proven local need and provided that the housing:

- i. remains affordable in perpetuity; and
- ii. is for people that are in housing need because they are unable to buy or rent properties in the village at open-market prices; and
- iii. is offered, in the first instance, to people with a demonstrated local connection, as defined by the Gateway Home Choice Based Lettings Scheme. Where there is no need, a property should then be offered to those with a demonstrated need for affordable housing in neighbouring villages.

These restrictions should be delivered through a legal agreement attached to the planning consent for the housing. Applications for such development will be considered in relation to the appearance and character of the surrounding area, the potential impact on residential amenity and highway safety.

To be acceptable, proposals should demonstrate that a local need exists which cannot be met by applying normal planning policy for the provision of affordable homes in association with market housing.

Any application for affordable housing in respect of this policy should be accompanied by a specific detailed need and the accommodation proposed should contribute to meeting this proven need.

In exceptional circumstances, a small number of market homes will be permitted where it can be demonstrated:

- a) that no other means of funding the construction of the affordable homes is available; and
- b) the market housing is subsidiary to the affordable housing element of the proposal and the amount of market housing required is, as demonstrated through a viability assessment, the minimum required to deliver the affordable housing.

Where sites for affordable housing in the countryside are brought forward with an element of market housing, both housing tenures should be built to the same design standards and contribute towards the character of the area.

DO YOU SUPPORT THIS POLICY?

Business and Employment

Sproughton parish makes an important contribution to the economy of Babergh and greater Ipswich, having an extensive employment area located between Junction 54 of the A14 and the main railway line.

The emerging Local Plan identifies Sproughton Enterprise Park and Farthing Road Industrial Estate as strategic employment locations.

Development of the remaining four plots of the Enterprise Park and redevelopment/improvement of Farthing Road Industrial Estate will be supported.

The Neighbourhood Plan:

- supports the creation of additional jobs where such development would not have a detrimental impact on the character of the area, the local road network and the amenity of residents living near the site or on the access route to the site.
- supports the completion of the development of the Enterprise Park.
- Enables using and converting redundant agricultural buildings for employment uses where any impacts on the landscape and infrastructure is acceptable.

Policy SPTN 4 – Employment Sites

The retention and development of existing employment and other business uses, including those identified on the Policies Map, will be supported providing such proposals do not have a detrimental impact on the local landscape character, heritage assets, residential (including noise, light and air pollution, loss of privacy and overlooking), traffic generation, identified important views and identified important gaps in the built-up area.

Proposals for non-employment or business uses that are expected to have an adverse impact on employment generation will only be permitted where one or more of the following criteria has been met:

- a) evidence can be provided that genuine attempts have been made to sell/let the site/premises in its current use, and that it can be demonstrated that no suitable and viable alternative employment / business uses can be found or are likely to be found in the foreseeable future;
- b) the existing use has created over-riding environmental problems (e.g., noise, odours or traffic) and permitting an alternative use would be a substantial environmental benefit that would outweigh the loss of an employment / business site;
- c) an alternative use or mix of uses would assist in regeneration and offer greater benefits to the community in meeting local business and employment needs;
- d) it is for an employment related support facility, such as employment training/ education or workplace crèche;
- e) an alternative use or mix of uses would provide other sustainability benefits that would outweigh the loss of an employment / business site.



DO YOU SUPPORT THIS POLICY?

Business and Employment

Policy SPTN 5 – New Businesses and Employment Development

Proposals for new business development will be supported where sites are located within the Settlement Boundaries identified on the Policies Map where they would not have an unacceptable impact on residential amenity, heritage assets and the highways network.

Outside the Settlement Boundaries, proposals will be supported where:

- a) it is located on land designated in the development plan for business use; or
- b) it relates to small scale leisure or tourism activities or other forms of commercial / employment related development or agriculture related development of a scale and nature appropriate to a countryside location and a need to be located outside the Settlement Boundary can be satisfactorily demonstrated.

Where possible, business developments should be sited in existing buildings or on areas of previously developed land and be of a size and scale that does not adversely affect the character, highways, infrastructure, residential amenity, environment (including national and international designated sites) and landscape character as identified in the Neighbourhood Plan Landscape Appraisal.



Policy SPTN 6 – Farm Diversification

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Proposals for new business development will be supported where sites are located within the Settlement Boundaries identified on the Policies Map where they would not have an unacceptable impact on residential amenity, heritage assets and the highways network.

Proposals for equestrian development, whether domestic or commercial, will be supported where the size, scale, design and siting of new development (including lighting and means of enclosure) do not have a significant adverse effect on the character and appearance of the locality.

DO YOU SUPPORT THESE POLICIES?

The natural environment has been highlighted by residents as being of significant importance to them.

A Landscape Appraisal for the parish was commissioned to support the content of the Neighbourhood Plan.

The threat of Ipswich and neighbouring villages expanding to join up with Sproughton is a considerable threat

The Neighbourhood Plan:

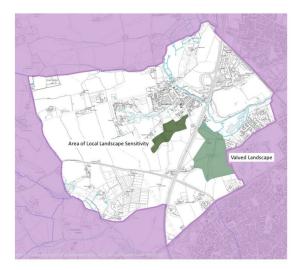
- recognises the presence of heritage and landscape assets in the parish in determining opportunities for future development.
- designates it an Area of Local Landscape Sensitivity
- also designates an area of Valued Landscape in Chantry Vale in the vicinity of the Red House
- identifies important gaps between settlements that should be protected
- recognises important views within the parish that should be protected from inappropriate development
- promotes the improvement of the "green infrastructure" network across the parish
- protects important open spaces

 Promotes the protection and enhancement of our wildlife habitats

Policy SPTN 7 – Area of Local Landscape Sensitivity

Development proposals in the Area of Local Landscape Sensitivity or Valued Landscape, as identified on the Policies Map, will be permitted only where they:

- i. protect and enhance the special landscape qualities of the area
- ii. are designed and sited so as to harmonise with the landscape setting of the site; and
- iii. provide landscape impact mitigation measures as part of the proposal.



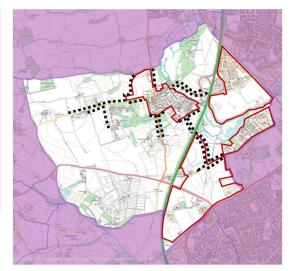


Policy SPTN 8 – Settlement Gaps

The open and undeveloped nature of the Settlement Gaps, as identified on the Policies Map, will be protected from development to help prevent coalescence and retain the separate identity of the settlements.

Development which is otherwise in conformity of Policy SPTN 1 will only be permitted within a Settlement Gap where:

- i. it would not undermine the physical and/or visual separation of the settlements; and
- ii. it would not compromise the integrity of the Settlement Gap, either individually or cumulatively with other existing or proposed development.

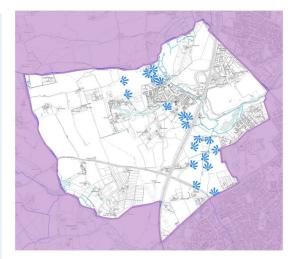


Policy SPTN 9 – Protection of Important Views

Distinctive views from public vantage points within or into the built-up areas and clusters, or out of built-up areas or clusters to the surrounding countryside, including those identified on Map 5 and the Policies Map, shall be maintained.

Proposals for new buildings outside the Settlement Boundaries should be accompanied by a Landscape Visual Impact Appraisal that demonstrates how the proposal:

- can be accommodated in the countryside without having a detrimental impact, by reason of the buildings scale, materials and location, on the character and appearance of the countryside and its distinction from the built-up area;
- ii. conserves and enhances the unique landscape and scenic beauty within the parish, having regard to the types of valued views identified and described in the Neighbourhood Plan Landscape Character Appraisal; and
- iii. protects the key features of the important views.



DO YOU SUPPORT THIS POLICY?

Policy SPTN 10 - Local **Green Spaces**

The following Local Green Spaces are designated in this Plan and identified on the Policies Map:

- 1. Millennium Green
- 2. Parish Square
- 3. Sproughton Court
- Glebe Close 4
- 5.
- Gipping Way Ladder Field, Church Lane 6.
- 7. Oak triangle by Manor Lodge
- 8. Allotments, Burstall Lane
- 9. Stella Maris (green at entrance)
- 10. Green triangle at junction of Hadleigh Road with 'First Strokes' swimming pool



Policy SPTN 11 – Biodiversity Protection and Enhancement

Development proposals should avoid the loss of, or material harm to trees, hedgerows and other natural features such as ponds.

Where such losses or harm are unavoidable, adequate mitigation measures or, as a last resort, compensation measures will be sought. If suitable mitigation or compensation measures cannot be provided, then planning permission should be refused.

Where new access is created, or an existing access is widened through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity.

Otherwise, acceptable development proposals will be supported where they provide a measurable net gain in biodiversity through, for example,

- a) the creation of new natural habitats including ponds;
- b) the planting of additional trees and hedgerows (reflecting the character of Sproughton's traditional hedgerows), and;
- c) restoring and repairing fragmented biodiversity networks through, for example, including holes in fences which allow access for hedgehogs.

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Policy SPTN 12 - Recreational Disturbance Avoidance and Mitigation

All residential development within the Zones of Influence (ZOI) of European sites will be required to make a financial contribution towards mitigation measures, as detailed in the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS), to avoid adverse in combination recreational disturbance effects and the integrity of the Habitats of the European sites.

DO YOU SUPPORT THESE POLICIES?

Policy SPTN 10 – Local Green Spaces

The following Local Green Spaces are designated in this Plan and identified on the Policies Map:

- 1. Millennium Green
- 2. Parish Square
- 3. Sproughton Court
- 4. Glebe Close
- 5. Gipping Way
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- 9. Stella Maris (green at entrance)
- 10. Green triangle at junction of Hadleigh Road with 'First Strokes' swimming pool

Policy SPTN 11 – Biodiversity Protection and Enhancement

Development proposals should avoid the loss of, or material harm to trees, hedgerows and other natural features such as ponds.

Where such losses or harm are unavoidable, adequate mitigation measures or, as a last resort, compensation measures will be sought. If suitable mitigation or compensation measures cannot be provided, then planning permission should be refused.

Where new access is created, or an existing access is widened through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity.

Otherwise, acceptable development proposals will be supported where they provide a measurable net gain in biodiversity through, for example,

- a) the creation of new natural habitats including ponds;
- b) the planting of additional trees and hedgerows (reflecting the character of Sproughton's traditional hedgerows), and;
- c) restoring and repairing fragmented biodiversity networks through, for example, including holes in fences which allow access for hedgehogs.

Policy SPTN 12 - Recreational Disturbance Avoidance and Mitigation

All residential development within the Zones of Influence (ZOI) of European sites will be required to make a financial contribution towards mitigation measures, as detailed in the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS), to avoid adverse in combination recreational disturbance effects and the integrity of the Habitats of the European sites.







DO YOU SUPPORT THIS POLICY?

Historic Environment

The built heritage is very important to the identity of our parish.

There are 17 Listed Buildings in the parish but no designated conservation area.

There are also a number of properties that have special qualities or an historic association and make a "positive contribution" to the character of the parish.

The Neighbourhood Plan:

- provides a policy for how development proposals that impact our heritage assets (listed buildings, archaeological sites and other historic features) will be considered
- proposes the designation of Local Heritage Assets (buildings which aren't currently listed)
- proposes the separate designation of a conservation area and, in the interim, designates that area s a Special Character Area



Policy SPTN 13 – Heritage Assets

To ensure the conservation and enhancement of the parish heritage assets, proposals must:

- a. preserve or enhance the significance of the heritage assets of the parish, their setting and the wider built environment;
- retain buildings and spaces, the loss of which would cause harm to the character or appearance within the parish including:

i. Areas of Distinctive Character

ii. Valued landscape areas

- c. contribute to the parishes' local distinctiveness, built form and scale of its heritage assets, through the use of appropriate design and materials;
- d. be of an appropriate scale, form, height, massing, alignment and detailed design which respects the area's character, appearance and setting, in line with the AECOM Design Guidance and Codes for Sproughton
- e. demonstrate a clear understanding of the significance of the asset and the wider context in which the heritage asset sits, alongside an assessment of the potential impact of the development on the heritage asset and its context; and
- f. provide clear justification, through the submission of a heritage statement, for any works that would lead to harm to a heritage asset yet be of wider substantial benefit.

Where a planning proposal affects a heritage asset, it must be accompanied by a Heritage Statement identifying, as a minimum, the significance of the asset, and an assessment of the impact of the proposal on heritage assets. The level of detail of the Heritage Statement should be proportionate to the importance of the asset, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting.

DO YOU SUPPORT THIS POLICY?

Historic Environment



PA

Policy SPTN 14 – Buildings of Local Significance

The retention and enhancement of local heritage assets including buildings, structures, features, archaeological sites and gardens of local interest must be appropriately secured.

Proposals for any works that would lead to the loss of or substantial harm to a local heritage asset or a building of local significance must be supported by an appropriate analysis of the significance of the asset to enable a balanced judgement to be made having regard to the scale of any harm or loss and the significance of the heritage asset.

The buildings of local significance in Sproughton parish and village draft document identifies these buildings.

Policy SPTN 15 – Sproughton Special Character Area

A Special Character Area is identified on the Policies Map. Within this area, proposals will only be supported where they preserve or enhance the distinct characteristics of the existing buildings and features and their setting, as identified in the Special Character Area Appraisal.



The Parish Council will seek the designation by Babergh District Council of a Conservation Area, as illustrated on Map 10, at the earliest possible opportunity

DO YOU SUPPORT THESE POLICIES?

Development Design

New development should achieve a high-quality design that enhances the unique characteristics of the parish and ensures a better quality of life for residents.

The parish has distinct character areas and new development should reflect the local characteristics.

Much of the parish lies within an area liable to flood from the river and other areas suffer from surface water flooding.

Unsympathetic and poorly designed development, especially within the vicinity of a heritage asset, can have a significant detrimental impact on the area.

While it would not be appropriate to rigidly copy the architectural styles and designs of the parish, the Plan does seek to ensure that new development is of high quality and has regard to its surroundings.

As part of the Government-funded Neighbourhood Planning Technical Support package, the Sproughton Design Guidance and Codes has been prepared for the parish.

The Design Guidance and Codes sets out general design guidelines that should be present in proposals, namely:

- Respect the existing settlement pattern in order to preserve the character. Coalescence development should be avoided
- · Integrate with existing paths, streets, circulation networks
- Reinforce or enhance the established character of streets, greens and other spaces
- Harmonise and enhance the existing settlement in terms of physical form, architecture and land use
- · Retain and incorporate important existing features into the development
- Respect surrounding buildings in terms of scale, roofline, height, form, and density
- Enhance and reinforce the property boundary treatments
- Adopt contextually appropriate materials and details
- · Provide adequate open space for the development in terms of both quantity and quality
- Incorporate necessary services and drainage infrastructure without causing unacceptable harm to retained features
- Ensure all components e.g., buildings, landscapes, access routes, parking and open space are well related to each other and
- Aim for innovative design and eco-friendly buildings while respecting the architectural heritage and tradition of the area whilst also integrating them with future development.





Development Design

Policy SPTN 16 – Development Design Considerations

Proposals for new development must reflect the local characteristics and circumstances in the Neighbourhood Plan Area and create and contribute to a high quality, safe and sustainable environment.

Planning applications should, as appropriate to the proposal, demonstrate how they satisfy the requirements of the Development Design Checklist in Appendix 2 of this Plan.

In addition, proposals will be supported where, as appropriate to the proposal, they:

- a. recognise and address the key features, characteristics, landscape/building character, local distinctiveness, and special qualities of the area and/or building and, where necessary, prepare a landscape character appraisal to demonstrate this;
- b. do not involve the loss of gardens, important open, green, or landscaped areas, which make a significant contribution to the character and appearance of that part of the village;

c. taking mitigation measures into account, do not affect adversely:

- i. any historic character, architectural or archaeological heritage assets of the site and its surroundings,
- ii. important landscape characteristics including trees and ancient hedgerows and other prominent topographical features as set out in the Landscape Appraisal,
- iii. identified important views into, out of, or within the village as identified on the Policies Map, and
- iv. sites, habitats, species and features of ecological interest;
- d. do not locate sensitive development where its users and nearby residents would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented;
- e. produce designs that respect the character, scale, and density of the locality and, for new dwellings, ensuring garden sizes are proportionate to the character of the area;
- f. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that road layouts do not dominate the area, that all vehicle parking is provided within the plot and seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement;
- g. where appropriate, incorporate sustainable drainage systems including, where feasible, rainwater and storm water harvesting and not result in water run-off that would add to or create surface water flooding;
- h. where appropriate, make adequate provision for the covered storage of all wheelie bins and for cycle storage, including cycle charging points, in accordance with adopted cycle parking standards;
- i. include suitable ducting capable of accepting fibre to enable superfast broadband; and
- j. provide one electric vehicle charging point per new off-street parking place created

Policy SPTN 17 – Flooding and Sustainable Drainage

Proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site drainage and water resources will be managed so as not to cause or exacerbate surface water and fluvial flooding elsewhere.

Proposals should, as appropriate, include the use of above-ground open Sustainable Drainage Systems (SuDS). These could include:

- wetland and other water features, which can help reduce flood risk whilst offering other benefits including water quality, amenity/recreational areas, and biodiversity benefits; and
- rainwater and stormwater harvesting and recycling; and
- · other natural drainage systems where easily accessible maintenance can be achieved.

DO YOU SUPPORT THESE POLICIES?

Infrastructure, Services and Facilities

Sproughton benefits from a good range of premises and facilities that provide for some day-to-day needs of residents, albeit that they are focused on the village.

Residents throughout the wider parish tend to rely on services in Ipswich.

During the lifetime of the Plan there may be circumstances that force the closure of a shop or community facility and where there is no demand, or it is not viable for it to remain in its current or alternative community use. In such circumstances it might be better for the premises to revert to an alternative use but only if certain circumstances can be proven.

The provision of sport and recreation facilities can play a significant role in supporting the health and welfare of residents of all ages. The loss of any sport and recreation facility will have a significant impact on the provision of opportunities to participate in fitness and sport and it is essential that these facilities are maintained and improved to support healthy lifestyles in future years.

The Neighbourhood Plan:

- Identifies existing services and facilities where proposals for their enhancement will generally be supported and where any loss to other uses will need to demonstrate that there is no longer a demand
- Encourages the reopening of the Wild Man PH
- Protects existing playing fields and sports facilities from being lost unless it can be demonstrated that there is a surplus of facility to meet local needs or that replacement facilities will be provided in an equally accessible location
- Enables the expansion of playing fields and sports facilities where the potential impact is acceptable
- Seeks to ensure that mobile phone masts, associated apparatus and overhead power lines are kept to a minimum, placed underground or, if not possible, camouflaged.

POLICY SPTN 18 - PROTECTING EXISTING SERVICES AND FACILITIES

Proposals that would result in the loss of valued facilities or services which support a local community (or premises last used for such purposes) including sports facilities, will only be supported where:

a. it can be demonstrated that the current use is not economically viable nor likely to become viable. Where appropriate, supporting financial evidence should be provided including any efforts to advertise the premises for sale for a minimum of 12 months; and

b. it can be demonstrated, through evidenced research, that there is no local demand for the use and that the building/site is not needed for any alternative social, community or leisure use; or

c. alternative facilities and services are available, or replacement provision is made, of at least equivalent standard, in a location that is accessible to the community it serves with good access by public transport or by cycling or walking.



Infrastructure, Services and Facilities

POLICY SPTN 19 - OPEN SPACE, SPORT AND RECREATION FACILITIES

Proposals for the provision, enhancement and/or expansion of amenity, sport or recreation open space or facilities will be permitted subject to compliance with other Policies in the Development Plan.

Development which will result in the loss of existing amenity, sport or recreation open space or facilities will not be allowed unless:

- a. it can be demonstrated that the space or facility is surplus to requirement against the local planning authority's standards for that location, and the proposed loss will not result in a shortfall during the plan period; or
- b. replacement for the space or facilities lost is made available, of at least equivalent quantity and quality, and in a suitable location to meet the needs of users of the existing space or facility.

Any replacement provision should take account of the needs of the settlement where the development is taking place and the current standards of open space and sports facility provision adopted by the local planning authority.

Where necessary to the acceptability of the development, the local planning authority will require developers of new housing, office, retail and other commercial and mixed development to provide open space including play areas, formal sport/recreation areas, amenity areas and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate. These facilities will be secured through the use of conditions and/or planning obligations.

Clubhouses, pavilions, car parking and ancillary facilities must be of a high standard of design and internal layout. The location of such facilities must be well related and sensitive to the topography, character and uses of the surrounding area, particularly when located in or close to residential areas.

Proposals which give rise to intrusive floodlighting will not be permitted

Community Action 2 – Playing Field Improvements

The parish council and the Playing Field Management Committee is working to investigate opportunities for the improvement of the existing children's play area

POLICY SPTN 20 - UTILITIES AND INFRASTRUCTURE

Proposals from mobile phone network operators to improve mobile coverage will be supported where:

- a. the apparatus is designed and sited to minimise intrusion and visual impact;
- the numbers of radio and telecommunications masts are kept to a minimum consistent with the efficient operation of the network; and
- c. proposals have been sited and designed to minimise the impacts on the rural character of Sproughton, having particular regard to the important views identified on the Policies Map.

Where possible, new overhead power and telephone cables/masts should be placed underground. Alternatively, they must be camouflaged to blend in with the environment.



DO YOU SUPPORT THESE POLICIES?

Highways and Movement

Neighbourhood plans have little power to introduce highway improvements as most schemes will not require planning permission. Improvements are therefore reliant on the County Council's Highways Department for investment in projects or improvements required as part of the mitigation of the impact of development proposals.

With that in mind, we have put together a package of aspirations for highways and transport improvements across the parish that will be pursued further during the lifetime of the Neighbourhood Plan.

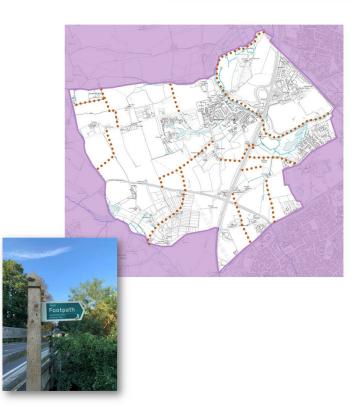
The aspirations are based on seeking to address the problems identified above as well as improving opportunities for sustainable travel for those that choose to travel in non-car modes.



POLICY SPTN 21 - PUBLIC RIGHTS OF WAY

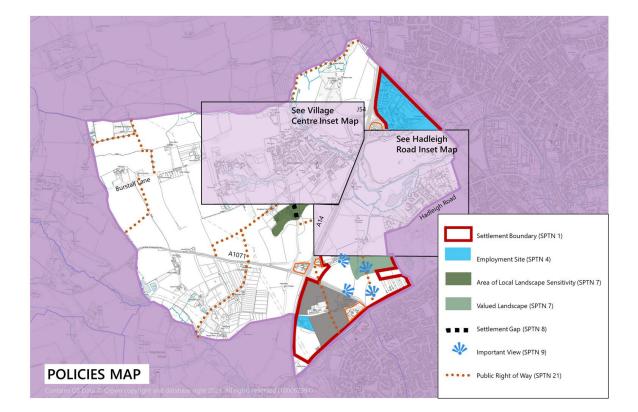
Measures to improve and extend the existing network of public rights of way will be supported if:

- i. Existing or new public rights of way are connected with neighbouring parishes to extend and develop the public rights of way with the Gipping Valley.
- ii. They lead to development of new bridleways to support the local equestrian community with the local and neighbouring parishes.
- iii.. Their value as biodiversity/wildlife corridors is recognised and protected and efforts are made to enhance biodiversity as part of the proposal.
- iv. Comprehensive signage is provided to encourage community and visitor use of the public rights of way within the parish.



DO YOU SUPPORT THIS POLICY?

Policies Map

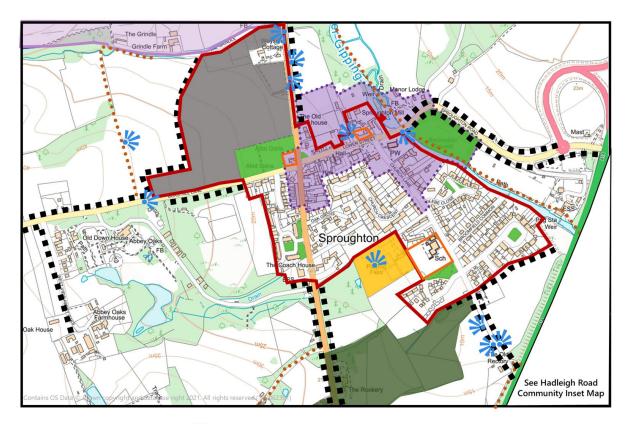


DO YOU SUPPORT THE POLICIES MAP?

Board 19

29

Village Centre Inset Map



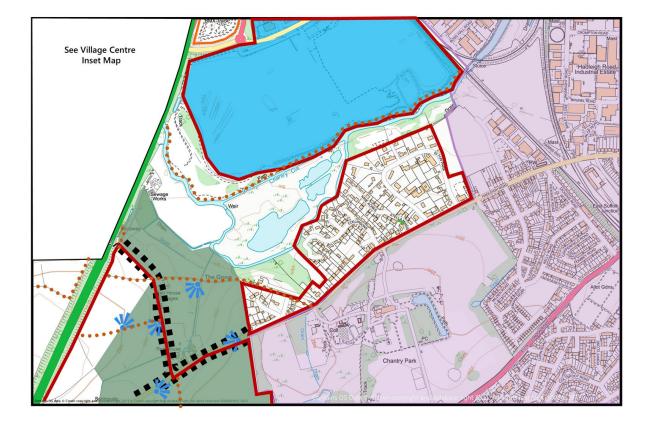
KEY	
	Settlement Boundary (SPTN1, SPTN2, SPTN3)
	Employment Sites (SPTN4)
	Area of Local Landscape Sensitivity (SPTN7)
	Valued Landscape (SPTN7)
	Settlement Gap (SPTN8)
24	Important Views (SPTN9)
	Local Green Spaces (SPTN10)
	Sproughton Special Character Area (SPTN15)
	Existing Services and Facilities (SPTN18)
	Open Space, Sport and Recreation Facilities (SPTN19)

••••• Public Right of Way (SPTN21)

DO YOU SUPPORT THE POLICIES MAP?

TC4P		

Ipswich Fringe Inset Map



DO YOU SUPPORT THE POLICIES MAP?

Pu PAP

What next?

Consultation on the Neighbourhood Plan ends on 15 November

At the end of the consultation the Parish Council will review all your submitted comments, as well as those from organisations such as the District Council, Natural England, Historic England and the Environment Agency, before deciding if any amendments to the Plan are required.

At the same time a "Consultation Statement" and a document known as the "Basic Conditions Statement" will be prepared. The Final Draft Plan – known as the "Submission Plan" and the above documents will be put to the Parish Council for approval for submission to Babergh District Council.

Referendum

If the Examiner recommends that a Parish Referendum on the Plan should take place, this will be organised and paid for by Babergh District Council in the same way as a local election.

Notice will be given of the Referendum and all those living in the parish that are entitled to vote will be asked whether the Neighbourhood Plan should be approved. No matter how many turn out to vote, if more votes say "Yes" then the Neighbourhood Plan will be adopted. Further Consultation

Babergh District Council will carry out a further six-week consultation on the Neighbourhood Plan before it is submitted to an Independent Examiner.

Examination

The Independent Examiner will review the Plan and consider any objections to it. The Examiner must consider:

- whether having regard to national policies and advice contained in guidance by the Secretary of State, it is appropriate to approve the neighbourhood plan;
- the approval of the neighbourhood plan contributes to the achievement of sustainable development;
- the approval of the neighbourhood plan is in general conformity with the strategic policies contained in the East Suffolk Local Plan;
- the approval of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations (despite Brexit).

The Examiner's Report will recommend whether the Plan, possibly with amendments, should proceed to a referendum in the parish.

You can submit your comments on the Draft Neighbourhood Plan online via the Parish Council website or, if you don't have the internet, by completing a comments form and sending it to the address on the form.

Why not complete a form today?

Thank you for visiting the Neighbourhood Plan consultation event today

Appendix 2 – Statutory Consultees Notified of Regulation 14 Consultation

MP for South Suffolk County Councillor to Gipping Valley Division County Councillor to Belstead Brook Division, Suffolk County Council County Councillor to Whitehouse & Whitton Division, Suffolk County Council County Cllr to Chantry Division, Suffolk County Council Babergh District Council Ward Councillors for Sproughton & Pinewood Ward Babergh District Council Ward Councillors for Copdock and Washbrook Ipswich Borough Council Ward Councillors for Whitehouse Ward Ipswich Borough Council Ward Councillors for Gipping Ward Ipswich Borough Council Ward Councillors for Sprites Ward Mid Suffolk District Council Ward Councillor for Bramford Clerk to Pinewood PC Clerk to Burstall PC Clerk to Bramford PC Babergh & Mid Suffolk District Councils Suffolk County Council **Ipswich Borough Council** Natural England **Environment Agency Historic England** East of England Office, National Trust Network Rail Infrastructure Limited **Highways England** Marine Management Organisation Vodafone and O2 mobile phone operators Three mobile phone operator Ipswich & East Suffolk CCG & West Suffolk CCG Transco - National Grid **UK Power Networks** Strategic and Spatial Planning, Anglian Water Essex & Suffolk Water National Federation of Gypsy Liaison Groups Norfolk & Suffolk Gypsy Roma & Traveller Service Diocese of St Edmundsbury & Ipswich Suffolk Chamber of Commerce New Anglia LEP RSPB Sport England (East) Suffolk Constabulary Suffolk Wildlife Trust Suffolk Preservation Society **Community Action Suffolk** Dedham Vale Society Suffolk Coast & Heath AONB Theatres Trust East Suffolk Internal Drainage Board Savills

Appendix 3 – Statutory Consultee Consultation Notice

Dear

SPROUGHTON (SUFFOLK) NEIGHBOURHOOD PLAN – PRE-SUBMISSION CONSULTATION (REGULATION 14)

As part of the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended), Sproughton Parish Council is undertaking a Pre-Submission Consultation on the Draft Sproughton Neighbourhood Plan. As a body/individual we are required to consult, we are hereby seeking your views on the Draft Neighbourhood Plan.

The full plan and supporting documents can be viewed at <u>Public Exhibition » Sproughton</u> <u>Village Website (onesuffolk.net)</u> together with information on how to send us your comments.

This Pre-Submission Consultation runs for a period of 6 weeks, between from 2nd October to 15th November inclusive.

We look forward to receiving your comments.

Appendix 4 – Summary of Responses to Consultation Questions

Do you support the content of Sections 1, 2 and 3?					
A	Answer Choices		sponse ercent	Response Total	
1	Yes	88	3.46%	46	
2	No	5.	.77%	3	
3	No opinion	5.	.77%	3	
		ans	swered	52	
		ski	ipped	5	

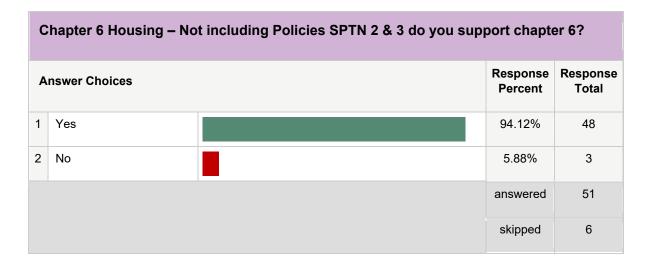
Do you support the Vision in Section 4?					
A	Answer Choices		Response Percent	Response Total	
1	Yes		92.45%	49	
2	No		1.89%	1	
3	No opinion		5.66%	3	
			answered	53	
			skipped	4	

D	Do you support Policy SPTN 1 Spatial Strategy?					
A	Answer Choices		Response Percent	Response Total		
1	Yes		90.91%	50		
2	No		9.09%	5		
3	No opinion		0.00%	0		
			answered	55		
			skipped	2		

С	Chapter 5 Spatial Strategy – Not including Policy SPTN 1, do you support chapter 5				
Answer Choices Response Response To					
1	Yes	94.23%	49		
2	No	5.77%	3		
		answered	52		
		skipped	5		

D	Do you support Policy SPTN 2 Housing Mix?				
A	Answer Choices			Response Total	
1	Yes		92.45%	49	
2	No		3.77%	2	
3	No opinion		3.77%	2	
			answered	53	
			skipped	4	

D	Do you support Policy SPTN 3 Affordable Housing on rural exception sites?				
A	Answer Choices			Response Total	
1	Yes		88.68%	47	
2	No		7.55%	4	
3	No opinion		3.77%	2	
			answered	53	
			skipped	4	



D	Do you support Policy SPTN 4 - Employment Sites?				
A	Answer Choices			Response Total	
1	Yes		94.34%	50	
2	No		3.77%	2	
3	No opinion		1.89%	1	
			answered	53	
			skipped	4	

D	Do you support Policy SPTN 5 New Business and Employment Development?				
A	Answer Choices			Response Total	
1	Yes		92.16%	47	
2	No		3.92%	2	
3	No opinion		3.92%	2	
			answered	51	
			skipped	6	

D	Do you support Policy SPTN 6 - Farm Diversification?				
A	nswer Choices	Response Percent	e Response Total		
1	Yes	89.09%	49		
2	No	5.45%	3		
3	No opinion	5.45%	3		
		answered	55		
		skipped	2		

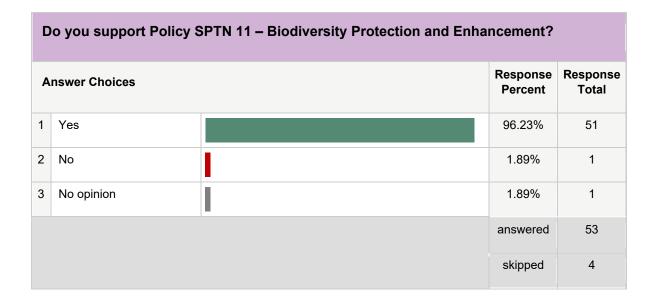
	Chapter 7 Business and Employment – Not including Polices SPTN 4 to 6, do you support chapter 7?				
Aı	Answer Choices Response Percent Response Total				
1	Yes		92.45%	49	
2	No		7.55%	4	
			answered	53	
			skipped	4	

D	Do you support Policy SPTN 7 – Area of Local Landscape Sensitivity?					
A	nswer Choices	Response Percent	Response Total			
1	Yes		89.09%	49		
2	No		7.27%	4		
3	No opinion		3.64%	2		
			answered	55		
			skipped	2		

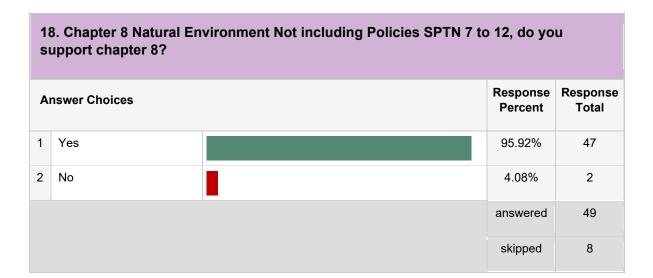
D	Do you support Policy SPTN 8 - Settlement Gaps?					
A	Answer Choices			Response Total		
1	Yes	9	90.91%	50		
2	No		5.45%	3		
3	No opinion		3.64%	2		
		ar	nswered	55		
		s	skipped	2		

D	Do you support Policy SPTN 9 Protection of important Views?				
A	Answer Choices			Response Total	
1	Yes	90	0.91%	50	
2	No	5.	.45%	3	
3	No opinion	3.	.64%	2	
		ans	swered	55	
		ski	ipped	2	

D	Do you support Policy SPTN 10 – Local Green Spaces?				
A	nswer Choices	Response Percent	Response Total		
1	Yes		94.44%	51	
2	No		1.85%	1	
3	No opinion		3.70%	2	
			answered	54	
			skipped	3	



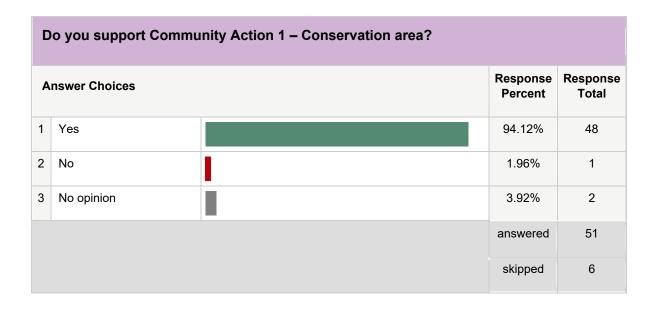
D	Do you support Policy SPTN 12 - Recreational Disturbance Avoidance and Mitigation?				
А	nswer Choices	Response Percent	Response Total		
1	Yes		90.38%	47	
2	No		3.85%	2	
3	No opinion		5.77%	3	
			answered	52	
			skipped	5	



D	Do you support Policy SPTN 13 – Heritage Assets?				
A	Answer Choices		Response Percent	Response Total	
1	Yes		94.44%	51	
2	No		3.70%	2	
3	No opinion		1.85%	1	
			answered	54	
			skipped	3	

D	Do you support Policy SPTN 14 – Buildings of Local Significance?				
A	Answer Choices		onse Respon ent Total		
1	Yes	94.3	4% 50		
2	No	3.77	7% 2		
3	No opinion	1.89	9% 1		
		answ	ered 53		
		skipţ	bed 4		

D	Do you support Policy SPTN 15 – Sproughton Parish Special Character Area?					
A	Answer Choices		Response Percent	Response Total		
1	Yes		94.44%	51		
2	No		3.70%	2		
3	No opinion		1.85%	1		
			answered	54		
			skipped	3		



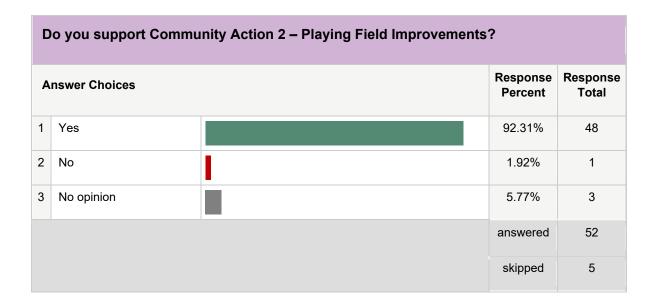
	Chapter 9 Historic Environment – Not including Policies SPTN 13 to 15, do you support chapter 9?			
Answer Choices Response Percent				Response Total
1	Yes		95.92%	47
2	No		4.08%	2
			answered	49
			skipped	8

D	Do you support Policy SPTN 16 – Development Design Considerations?				
A	Answer Choices		Response Percent	Response Total	
1	Yes		92.31%	48	
2	No		3.85%	2	
3	No opinion		3.85%	2	
			answered	52	
			skipped	5	

D	Do you support Policy SPTN 17 – Flooding and Sustainable Drainage?				
A	Answer Choices			Response Total	
1	Yes		94.44%	51	
2	No		1.85%	1	
3	No opinion		3.70%	2	
			answered	54	
			skipped	3	

	Chapter 10 Development Design – Not including Policies SPTN 16 & 17, do you support chapter 10?				
Aı	nswer Choices	Respo Perce		e	
1	Yes	96.00	0% 48		
2	No	4.00	9% 2		
		answe	ered 50		
		skipp	ped 7		

D	Do you support Policy SPTN 18 – Protecting Existing Services and Facilities?					
A	Answer Choices			Response Total		
1	Yes		94.34%	50		
2	No		1.89%	1		
3	No opinion		3.77%	2		
			answered	53		
			skipped	4		



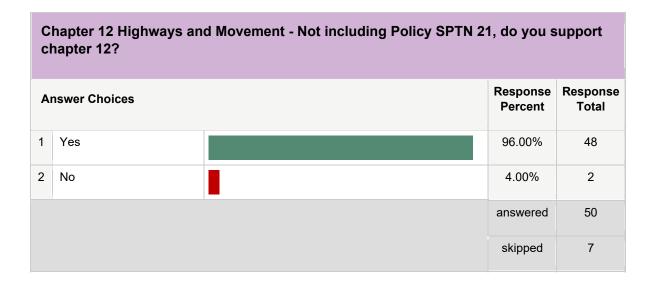
D	Do you support Policy SPTN 19 – Open Space, Sport and Recreation Facilities?				
A	Answer Choices			Response Total	
1	Yes		96.15%	50	
2	No		1.92%	1	
3	No opinion		1.92%	1	
		а	inswered	52	
			skipped	5	

D	Do you support Policy SPTN 20 – Utilities and infrastructure?				
A	Answer Choices		Response Percent	Response Total	
1	Yes		96.30%	52	
2	No		1.85%	1	
3	No opinion		1.85%	1	
			answered	54	
			skipped	3	



D	Do you support Policy SPTN 21 – Public Rights of Way?				
A	Answer Choices			Response Total	
1	Yes		96.23%	51	
2	No		1.89%	1	
3	No opinion		1.89%	1	
			answered	53	
			skipped	4	

D	Do you support Community Action 2 – Public rights of way?				
A	Answer Choices		Response Percent	Response Total	
1	Yes		94.23%	49	
2	No		3.85%	2	
3	No opinion		1.92%	1	
			answered	52	
			skipped	5	



D	Do you support the Parish Wide Policies Map?				
A	Answer Choices			Response Total	
1	Yes		86.00%	43	
2	No		8.00%	4	
3	No opinion		6.00%	3	
			answered	50	
			skipped	7	

D	Do you support Village Centre Policies Map?				
A	Answer Choices			Response Total	
1	Yes		90.57%	48	
2	No		5.66%	3	
3	No opinion		3.77%	2	
		e e e e e e e e e e e e e e e e e e e	answered	53	
			skipped	4	

D	Do you support the Ipswich Fringe Policies Map?				
Answer Choices Response Percent To					
1	Yes	88.24%	45		
2	No	3.92%	2		
3	No opinion	7.84%	4		
		answere	d 51		
		skipped	6		

D	Do you have any other comments on the Draft Neighbourhood Plan?				
Answer Choices Response Percent					
1	Yes	62.96%	34		
2	No	37.04%	20		
		answered	54		
		skipped	3		

Appendix 5 - Responses received to Pre-Submission Consultation, Responses to Comments and Proposed Changes

The table in this appendix sets out the comments that were received during the Pre-Submission Consultation Stage and the responses and changes made to the Plan as a result of the comments. The table is laid out in Plan order with the general comments following the comments on the policies. Where proposed changes to the Plan are identified, they relate to the Pre-Submission Draft Plan. Due to deletions and additions to the Plan, they may not correlate to the paragraph or policy numbers in the Submission version of the Plan.

Name	Organisation	Comment			
Sections 1, 2	ections 1, 2 and 3 comments				
B Hunt	-	South of the village is already being over developed. The original heritage north side of the village should remain untouched.			
S Marquess	-	Chapter 2, paragraph 2.14 Volume of traffic/speed/parking:			
		Traffic/parking along Church Lane is a nightmare during the Primary School runs! Perhaps if traffic were controlled more could walk safely to/fro school?			
C Fuller	-	Ch1 para 13 - The terms 'conserve' and 'enhance' are more appropriate than 'protect' and 'preserve' when considering the needs of the charm and unique character of the parish.			
		Ch3 para3.2 - The NPPF defines sustainable development as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'. The consistently expressed concerns of residents (notably High Street) about lack of pedestrian safety; traffic volume/HGV usage clearly shows that the current scale of development within the surrounding area significantly adversely impacts on residents, thus the present needs are not being met. The proposed imposition of a minimum of 1514 new homes plus additional intensification of residential & employment development in the vicinity of sproughton will only serve to bring further and higher traffic volumes; more necessary diversions of HGV A14 traffic; reduced Air Quality: increased Noise pollution and increased health & safety risks to pedestrians and residents of high street, sproughton. The 'well being' of future residents and visitors to sproughton is therefore being compromised by the imposition of an inappropriate scale of development in this locality that will exacerbate the longstanding & well defined impacts (eg Parish Plan) caused by the traffic. Thus by its own definition the current and proposed development for Sproughton cannot be regarded as sustainable development because it doesn't meet the needs of the present and will compromise the ability of future to meet their own needs (which fundamentally meets good wellbeing and high quality of life). The COP26 has clearly identified that unsustainable development is a collective concern and local people need to challenge plans that will erode environmental quality - this plan should seek to do this.			
S Maxwell	-	I would say in 3.7 Sproughton is a Hinterland village and not a Core village because it has little amenities, ie shops, supermarkets, post office as Bramford has.			
S Lavington	-	Page 10, para. 2.3, History. Should mention that the B1113 (High Street) follows the route of Iter IX, the Roman road from Colchester to Caister-by-Norwich. Of			

No changes have been made to the comments and they are as received.

Name	Organisation	Comment
		interest is the fact that the Sproughton field boundaries generally align perpendicular to the River Gipping and were laid down prior to
		the arrival of the Roman road. One consequence of this can be seen in the southern boundary wall to number 46 High Street, which
		follows an ancient field boundary and therefore does not align with more recent houses whose boundaries are perpendicular to High
		Street (the Roman road).
S Catermole	-	I do not agree with the minimum housing requirement allocated for Sproughton of 1514 new homes. The reasons are shown in Para
		2.16 which i agree with. There are safety issues for the pedestrians. Understand the JLP has minimum housing requirements.
G Armstrong	Armstrong Rigg	No.
	Planning on	
	behalf of	National Planning Practice Guidance (PPG) is clear at Reference ID: 41-009 that where a Neighbourhood Plan is brought forward
	Hopkins Homes	before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the
		relationship between policies in: the emerging Neighbourhood Plan; the emerging Local Plan; and the adopted Development Plan. It notes that it is particularly important for any issues to be resolved to ensure the draft Neighbourhood Plan has the greatest chance of
		success at independent examination.
		success at independent examination.
		In this context, we support the inclusion of the following contextual statements in Chapter 1 of the Neighbourhood Plan:
		- Paragraph 1.5 sets out that the Neighbourhood Plan cannot go against the strategic policies of the Joint Local Plan or stop
		development that already has planning permission.
		- Paragraph 1.10 recognises that the Neighbourhood Plan cannot contradict the strategic policies and site allocations in the emerging Local Plan.
		Despite this recognition of the importance of not contradicting the emerging Local Plan, the remainder of the Neighbourhood Plan
		clearly sets out to contradict the emerging Local Plan with respect to the proposed allocation of Land east of Lorraine Way (JLP Policy LA116).
		For example, at Paragraph 3.8 the Neighbourhood Plan states:
		"one of the sites [i.e. Policy LA116] was refused planning permission by the district council in 2020 and a subsequent appeal was dismissed by the Secretary of State. It remains to be seen whether this allocation, which is not supported in the Neighbourhood Plan,
		survives the examination of the Joint Local Plan."
		This statement clearly contradicts the emerging Local Plan which continues to allocate the site for development in full knowledge of
		the appeal decision. The District Council has reviewed the appeal decision and has presented detailed further evidence to demonstrate
		the acceptability of the site allocation on heritage grounds. The Neighbourhood Plan's decision not to support the site allocation therefore directly contradicts the emerging Local Plan. We object to paragraph 3.8 for this reason and consider that the inclusion of
		this statement renders the Neighbourhood Plan contrary to the PPG and it would therefore not meet the basic conditions set out in
		this statement renders the Neighbourhood Plan contrary to the PPG and it would therefore not meet the basic conditions set out in

Name	Organisation	Comment
		paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.
	Pigeon Investment Management Ltd and the	The SNP correctly identifies that the development plan consists of the adopted Core Strategy and the 'saved policies' of the 2006 Babergh Local Plan. However, the SNP notes that the current strategic planning framework for Sproughton is likely to be replaced by the emerging Joint Local Plan (JLP) in the near future.
	Felix-Thornley Cobbold Agricultural Trust	As such, the SNP gives significant regard to the content of the JLP, including the proposed allocations and settlement boundaries contained within the emerging JLP. Given the advanced stage of preparation of the JLP, this is an appropriate approach for the SNP to adopt and one which Pigeon and the Trust fully support.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.2 Paragraph 1.10 of the Pre-submission SNP acknowledges that it cannot contradict the strategic policies and site allocations in the emerging Local Plan and we fully support this statement, which aligns with Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).
		2.3 As identified in this Section, however, it is clear that the Pre-submission SNP does contradict the strategic policies and site allocations in the Draft JLP.
		2.4 Paragraph 1.12 states that the current adopted Babergh Local Plan Core Strategy, provides a framework for the period to 2036. This statement is incorrect, the adopted Core Strategy provides a framework to 2031.
		2.5 We disagree with Paragraph 1.17, which states "The Plan has been developed through extensive community consultation and is based on sound research and evidence." We have fundamental concerns with regards to the Landscape evidence and site assessment work and their methodologies that support this Pre-submission SNP, as they clearly conflict and undermine the Draft JLP evidence base. Our concerns are set out in detail in the proceeding section.
		2.6 We do not disagree with Chapters 2 and 3, however it should be acknowledged that the recent pause to the Draft JLP Examination may need to be considered in terms of timescales for the Pre-submission SNP production.
	lpswich Borough Council	It is noted in the foreword and at paragraph 1.12 that reference is made to the Neighbourhood Plan covering the period to 2036. However, it is clear from the title page and the vision in Chapter 4 that the intended plan period is to 2037. It is assumed for the purposes of this response that the plan period is to 2037 so that it matches the plan period set out in the emerging Babergh & Mid Suffolk Joint Local Plan (JLP) but this should be clarified for completeness. Should there be any changes to the period that the B&MS JLP covers then consideration should be given to the timescales set.
		Step 2 of neighbourhood planning (gathering the research and information baseline), should in addition to consulting those who live and work in the area should also include those with an interest in or are affected by the proposals and this should also include

Name	Organisation	Comment
		landowners. I am not aware that the Council as the owner of Sproughton Enterprise Park (also known as Eastern Gateway) was involved at this stage which it should have been.
		Chapter 3 Chapter 3 sets out the planning policy context of the Neighbourhood Plan area. It is requested that a short paragraph be included to highlight the current position in terms of planning policy in Ipswich Borough in terms of the adopted and emerging Local Plans. The adopted 2017 Local Plan and the emerging Ipswich Local Plan which is awaiting the Inspectors report following the Main Modifications public consultation. This is because of the close geographical and functional relationship between the Borough and Sproughton.
	Suffolk County Council	In terms of paragraph 2.14, SCC as The Highway Authority is aware of the traffic issues in the village and any measures to improve highway safety and reduce congestion are fully supported and will be procured through development wherever possible. Potential changes to signal timing at key junctions are being considered to discourage rat-running issues along B1113.
	Babergh	Foreword, Para 1.12
	District Council	The plan period end dates should read 2037.
		Para 1.6 Drop 'th' from 26 February 2020 so the date format is consistent with rest of the Plan
		Para 1.19 " which are published" instead of " which is published"
		Para 2.11 The quoted percentages don't quite match the pie chart below.
Parish Coun	cil Response	

- The comments are noted
- The neighbourhood plan has to conform with the strategic policies of the Local Plan, where the village is defines as a Core Village
- In December 2021 the Local Plan Inspectors issued a note to the District Council recommending that all new allocations in the Joint Local Plan (including the site at Lorraine Way) be deleted, to be addressed at a later date in a new Part 2 of the Joint Local Plan, and that Settlement Boundaries should revert to those in the adopted Local Plan. As such, the Neighbourhood Plan is not in contradiction with the Joint Local Plan.
- Given the recent decisions by the Local Plan Inspectors, there is no reason to halt the submission of the Neighbourhood Plan.
- The foreword will be amended to refer to 2037 as the end date.
- Other errors and matters raised will be addressed

- Amend the Foreword to refer to 2037 as the end date
- Amend para 1.6 to 26 February 2020
- Amend Para 1.12 to make Core Strategy end date 2031
- Amend final sentence of para 1.19

Name Organisation

Comment

Amend percentages in para 2.11Para 3.6 will be updated to reflect the changes to the JLP.

Vision Com	Vision Comments				
V Durrant	If applicable	The Vision and resulting Objectives are fully supported. The Development Design paras (14-16) and Infrastructure paras (17-19) are important for ensuring the character of the village are maintained and supporting facilities further developed. The Transport Objectives support the vision successfully but it is especially important that the objectives of para 23 are robustly supported and maintained by the developers to ensure the amenity and safety of residents.			
J Webb	-	The Wall around (& its two bells must be preserved) the Old Rectory P15 built by William Mee.			
C Fuller	-	 Vision - This text could be beneficially adjusted as follows: In 2037 Sproughton will be a thriving safe parish that will have met the requirements of sustainable development ensuring the special character, historic landscape & environment has been conserved and enhanced for the benefit of residents, visitors and sproughton businesses. 2- 4.2 Housing Objectives - Need to revise the objective text 'To maintain a residential community that can experience a high quality of life. Natural Envt Objectives - 8 - Need to revise the objectives text ' To conserve and enhance ' Add text - To ensure water, soil, noise, light and air quality meets appropriate environmental standards. Business & Employment Objectives - 4 - Need to revise the objective text 'To ensure new buildings either avoid, mitigate or compensate for environmental impact where necessary to ensure a net environmental gain is delivered. Transport objectives - 23 - Need to revise the objectives text 'To address the impact of traffic through the village and ensure any future development within or affecting the parish adequately addresses these impacts alone and in combination with other developments consistent with sustainable development principles and environmental net gain objectives' 			
	Boyer on behalf of Taylor Wimpey UK Ltd	2.7 The Vision and Objectives appear to echo the principles set out within national planning policy though the NPPF (2021), reinforced through the Draft JLP, and are largely supported.			
	Ipswich Borough Council	Whilst the Council does not disagree with the intentions behind the list of objectives provided in the Neighbourhood Plan, it is recommended that the 24 objectives are consolidated down to a more focussed number of objectives. This will also make monitoring progress against the objectives easier. For comparison, the emerging Babergh and Mid Suffolk Joint Local Plan has nine objectives and the emerging Ipswich Local Plan has 12 objectives. In light of the smaller geographical scale of the Parish compared to the wider Districts and Borough it would be expected that the quantity of objectives for the neighbourhood plan would be lower than local plan level. As an example, objective No's 21 and 24 could be merged into one objective as cycle routes and sustainable travel modes relate very closely to one another. Consolidating the list of objectives will also aid significantly with the monitoring of these objectives after adoption.			

Name	Organisation	Comment
		On a specific note, it is recommended that objective No.12 is amended to read "To conserve and or enhance the heritage assets and their settings." This complies with national guidance on historic assets. It would also be helpful to include more in the neighbourhood plan regarding the housing objectives covering the measures to improve the community cohesion and integration between the Wolsey Grange sites and the Parish. For example, connecting the rights of way between the Wolsey Grange Site 2 and Sproughton Enterprise Park. Land owned by Ipswich Borough has been safeguarded to help provision of a crossing point over the river to help facilitate this.
	Babergh District Council	Objective 13 (pg 13 & 45) Should this read ' historic character <u>of the parish</u> .'? Without the last three words, the objective seems a bit vague.

Parish Council Response

- The comments are noted
- The Objectives will be reviewed and consolidated.
- Objective 13 will be amended

- Review and consolidate Objectives
- Amend Objective 13 as suggested by Babergh DC

Policy SPTN	1 Spatial Str	ategy
H Davies	-	It is important that Sproughton does not join up with Ipswich & Bramford becoming a suburb of Ipswich - no to urban sprawl
J Tuppen Davies	-	Sproughton must remain a village and not join up with Bramford, Ipswich or Burstall. Policies should be constructed to achieve this
K Athroll	-	My reason being that you are swamping an area around Hadleigh Road/church lane with housing/traffic congestion which is not suitable.
J Webb	-	No more HUGH white buildings.
P Powell	-	 However: Re proposed amendment to PIns examination of JLP by BMSDC SP03(1) SP03(4) Removed; this removes substantial policy requirements for infrastructure, quality of development and development sympathetic with setting/area. SP03(3) that development outside settlement boundaries no longer subject to EXCEPTIONAL circumstances and now only subject to limitations of National Policy. Re: SPTN1 Para3: 'Proposals for development located outside the Settlement Boundary will only be permitted where they are in accordance with national and district level policies'. This needs consideration now as only National policy remains since the amended JLP has by removal or amendment of SP03 removed much district policy relevant to objectives of SPTN1.

Name	Organisation	Comment
C Fuller	-	The text of SPTN1 needs revision to 'The NP area will seek to accommodate development commensurate with sustainable development principles and Sproughton's hierarchy. Settlement boundaries, as defined on the policies map indicates the extent of land that Babergh & Mid Suffolk local plan regards as necessary for local plan district housing targets to be met.'
		The key aim should be to ensure sustainable development is delivered accounting for qualitative & quantitative indicators rather than the local plans minimum quantitative housing targets. This fits better with the governments definition of 'Sustainable Communities are places where people want to live and work now and in the future. They meet the diverse needs of existing and future residents, are sensitive to the environment, and contribute to a high quality of life'.
J Pateman- Gee		This policy consists of three policies, but is unclear and confusing as explained below. This policy also raises the first overarching considerations in terms of particular word use that needs to be consistent and fully understood throughout all policies. "Development" without any context is a word that represents everything and in planning terms can cover both operation works as well as change of use. It covers commercial, agricultural, industrial and residential development from dwellings to household extensions. The NP needs to be very careful and ensure the context of the word development is understood in respect of the specific policy or it may cover much more than intended. In this first policy please consider if development is meant to be "Housing Development" or otherwise is meant to cover all other aspects of development types as well.
		Para 1 - The Neighbourhood Plan (NP) area is the area the policies and vision of the entire NP applies to. The Plan area is not the same area as the Settlement Hierarchy. However, essentially this para says the Neighbourhood Plan area (much larger than any of the current and proposed settlement boundaries in the LPA local plan) will take all development that the district decides should go to Sproughton. It is true that the district does dictate the extent of development (be it a focus on housing) that each parish needs to take and this para puts this in a confusing way. So the real question is why is this statement needed at all as it simply tries to describe the mechanics of planning policy.
		Para 2 - "Settlement Boundaries, as defined on the Policies Map, identify the extent of land which is required to meet the development needs of the parish."
		Firstly "settlement boundaries" is not defined. It's a common term in planning and therefore it's assumed everyone knows what this is, but it is not clear in the policy or any glossary.
		Second, this provides that said settlement boundaries will identify the extent of land to meet the development needs of the parish. I have never understood settlement boundaries to identify the extent of land to meet needs. Para 5.3 and 5.4 of the NP that serve to support this policy are more helpful, but do not feature as part of the policy itself. Most of the time developers and the LPA will essentially ignore anything not defined as the policy text. Essentially, settlement boundaries is where development (all types) should be directed, unless the LPA Development Plan or NPPF would otherwise say so.

Name	Organisation	Comment
		Para 3 - This essentially says proposals for development (all types?) when outside the Settlement Boundary can go ahead if in accordance with national and district level policies. What this fails to say is "and the policies of this Neighbourhood Plan, because otherwise what was the point.
		Overall the point of this policy is unclear and does not provide a clear objective. We all know what is it trying to achieve, but I think this needs to be looked at again to get it right.
		Suggested Wording Change for this policy:
		The following is respectfully suggested for consideration:-
		All development (with exception of agricultural and householder development) shall be directed to within Settlement Boundaries, as defined on the Policies Map, unless otherwise allowed in principle by national and district level policies adopted and/or the policies of this neighbourhood plan.
G Armstrong	Armstrong Rigg Planning on behalf of	No. We object to the failure to include Land east of Lorraine Way (JLP Policy LA116) within the settlement boundary.
	Hopkins Homes	POLICY SPTN 1 – SPATIAL STRATEGY states that:
		 The Neighbourhood Plan area will accommodate development commensurate with Sproughton's position in the district's Settlement Hierarchy; and Settlement Boundaries, as defined on the Policies Map, identify the extent of land which is required to meet the development needs of the parish.
		Neither of these statements is factually correct with respect to the emerging Local Plan which identifies Sproughton as a Core Village within the Ipswich Fringe and allocates it a level of development that is commensurate with this position at the top of the settlement hierarchy. This includes the allocation of Land east of Lorraine Way (JLP Policy LA116) and yet the Neighbourhood Plan fails to include this land within the settlement boundary despite including other site allocations that do not yet have planning permission. The failure to include JLP Policy LA116 within the settlement boundary means that the Neighbourhood Plan neither accommodates development commensurate with Sproughton's position in the Settlement Hierarchy, nor do the proposed Settlement Boundaries identify the extent of land which is required to meet the development needs of the parish. The exclusion of Land east of Lorraine Way (JLP Policy LA116) from the settlement boundary renders the draft Neighbourhood Plan contrary to the emerging Local Plan and to national policy and therefore fails to meet the basic conditions.

Name	Organisation	Comment
	Pigeon Investment Management Ltd and the	Paragraph 5.3 of the SNP states that, in accordance with Policy SP03 of the emerging JLP, the principle of development within defined settlement boundaries will be supported. This approach is reflected in SNP draft Policy SPTN 1, which refers to the Settlement Boundaries, as defined on the Policies Map.
	Felix-Thornley Cobbold Agricultural Trust	Whilst not reflected in the policy text, paragraph 5.3 goes on to state that outside the settlement boundaries, development will not normally be permitted unless there are 'exceptional circumstances', "as defined by the JLP and the National Planning Policy Framework (NPPF)".
	Trust	The term 'exceptional circumstances' appears to have been taken from the Submitted Version of the JLP, where at Policy SP03 it stated in Part 2 that 'outside of the defined settlement boundaries, in isolated locations development will only be permitted in exceptional circumstances'.
		However, through the hearing sessions for the examination of the JLP, the Councils have proposed a main modification to Policy SP03. This is in light of guidance from the Inspectors who questioned whether such a requirement was in compliance with national planning policy. On reflection, the Councils have considered this further and proposed a modification to the Inspectors, which will be consulted upon at a later date. The proposed modification is that 'outside of defined development boundaries, development will only be permitted in circumstances specified in national policy'. To retain the requirement in the SNP for development to only be allowed outside the settlement boundaries in exceptional circumstances would be actively preventing development that is now proposed as acceptable in the relevant spatial policy of the emerging JLP.
		As such, Paragraph 5.3 should be amended to remove any reference to exceptional circumstances and should simply refer to proposals that are in accordance with national and district level policies (as per the draft policy text above).
	Boyer on behalf of Taylor Wimpey UK Ltd	2.8 We support the principle of Policy SPTN 1, specifically the recognition that the NDP will accommodate development in accordance with the position of Sproughton in the Draft JLP. Sproughton is identified as Ipswich Fringe, which is the highest position in the settlement hierarchy. In accordance with Draft JLP Policy SP03, Ipswich Fringe "will act as a focus for development, which will be delivered through site allocations in the Plan and/ or in Neighbourhood Plans". We also support the recognition that the NDP cannot plan for less development than that specified in the Draft JLP.
		2.9 We acknowledge the reference made to settlement boundaries and note that Policy SPTN 1 states that settlement boundaries identify the extent of land which is required to meet the development needs of the parish and proposals for development located outside the settlement boundary will only be permitted where they are in accordance with national and district level policies.
		2.10 The settlement boundary set out in the Parish wide policies map does not, however, include the full extent of Draft JLP emerging allocation LA013 and therefore does not currently conform with the Draft JLP as it would prevent the comprehensive delivery of allocation LA013 which contributes to the Draft JLP housing numbers. As a result, the settlement boundary fails to meet Basic

Name	Organisation	Comment
		Condition e) set out in Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).
		2.11 We strongly recommend and request that the settlement boundary is amended to align with the settlement boundary set out within Draft JLP. This will ensure that the Pre-submission SNP appropriately accords with Basic Condition e) of Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).
	Babergh District Council	Housing Numbers Settlement Boundary (SPTN1 etc. and various maps)
		Table 1 (pg 17) explains how the minimum housing requirement figure for this area (1,514 dwellings) has been calculated. Para 6.2 expands on the situation regarding JLP site allocation LA116 (Land east of Loraine Way), noting that there are unresolved issues. It also pre-empts an outcome whereby the JLP allocation is removed, and the housing requirement figure reduced accordingly. The reasoning for this is understandable but for now, and until such time as the JLP Hearings have come to an end, this Council's position is that the housing figure for Sproughton remains fixed at 1,514 dwellings. The Parish Council are also reminded of the requirement for this Neighbourhood Plan (NP) to be in general conformity with the strategic policies contained in any development plan for the area and that National Planning Policy Framework (NPPF) para 29 explains that: "Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies".
		 The question then is, what are options are on the table? 1. This NP could anticipate that an alternative scheme will come forward on the LA116 allocation site at a later date, in which case the site should be included with the settlement boundary as shown on Map 5 and on the relevant policy maps. 2. If the Parish Council feel confident that LA116 cannot progress and accept that the minimum housing number will remain unchanged, this NP will need to find and allocate an alternative site to make up the shortfall. 3. The Parish Council can await the outcome of the decision on the JLP.
		We do appreciate that none of the above will be desired by the Parish Council. Option 2 will set this Plan back simply because it will require you to undertake further assessment work etc. Some of that time might be negated somewhat if, for example, an alternative site which delivers an equivalent number of new homes, has happened to have come forward through the planning system in the meantime. That could then form the basis of an alternative allocation in this Plan.
		Finally, we note that the settlement boundary on Map 5 etc. is drawn to exclude the buildings around 'First Strokes' and the small field immediately south of this (bounded by Hadleigh Rd, the A1071 and the A14). In the submitted JLP all are included within the defined settlement boundary which follows the line of the A14 embankment. Amending the NP maps to match the JLP should, in this regard, be easily amended.

Name Organisation Comment

Parish Council Response

- The comments are noted
- The policy is clear in its approach and is in general conformity with the NPPF.
- The Joint Local Plan housing requirement is a minimum and not a target
- In December 2021 the Local Plan Inspectors issued a note to the District Council recommending that all new allocations in the Joint Local Plan (including the site at Lorraine Way LA013) be deleted and that Settlement Boundaries revert to those in the adopted Local Plan. As such, the Neighbourhood Plan is not in contradiction with the Joint Local Plan as the site in Lorraine Way is not now to be allocated in the Joint Local Plan at this time.
- Paragraph 1 of the Policy states that the level of development proposed in the Plan area accords that in the strategic policies of the Local Plan.
- It is unlikely that an amendment of the policy to limit any development to within the settlement boundaries would survive the independent examination of the Plan.
- Given that the housing allocations in the Joint Local Plan now have no meaning, it is not necessary to consider any of the three options put forward by Babergh DC.
- The glossary will be amended to define "settlement boundary"

- Amend Settlement Boundaries on Policies Map to reflect proposed removal of new site allocations in the emerging Joint Local Plan.
- Amend Glossary to define "settlement boundary"

Chapter 5 G	Chapter 5 General Comments		
V Durrant	If applicable	Para 5.2 is of utmost importance in ensuring the continued character of the village and is not diluted in any move to assimilate our Parish into Ipswich. This would completely break down the 'Community Spirit' if allowed to happen. The objective of para 3 must be robustly defended and any adverse impacts on 'residential amenity' must be satisfactorily mitigated ro strongly opposed.	
H Davies	-	The policy needs to be strengthened to emphasise no creeping coalesence	
B Hunt	-	Major traffic concerns using the village on already over crowded roads by large scale housing developments including possibilty of approval of Snowasis in Claydon and Bramford.	
P Powell	-	However: As above particularly with reference to 5.2 and 5.3	
C Fuller	-	5.2 - 1st sentence - I disagree, this plan should strive to challenge the lpa to demonstrate & ensure the proposed scale of development delivers a sustainable development solution.	
		5.4- 1st sentence needs to include text ' not have a detrimental impact on the environmental quality'.	
		2nd sentence needs to be adjusted ' All development sites will need to avoid contributing to air, water & noise pollution and traffic volumes on the village road network'.	

Name	Organisation	Comment
	Boyer on behalf	2.12 We support the content of Chapter 5, particularly the acknowledgement that the A14 creates a physical barrier between the
	of Taylor	village and wider parish. The A14 is also considered to represent a physical barrier separating the Draft JLP emerging allocation LA013
	Wimpey UK Ltd	with the wider countryside and this should be acknowledged in the Pre-submission SNP.
	Ipswich	The opening sentence of paragraph 5.1 states "As noted above, in paragraph 3.6," However paragraph 3.6 is quite detached
	Borough	physically from this paragraph and it is therefore suggested that this is reworded for clarity.
	Council	
		It is also recommended that paragraph 5.4 is amended when explaining the impacts of noise and air quality. The paragraph currently
		uses "adverse" when describing noise and air quality impacts, but it is advised that this is amended to "unacceptable". This is because a
		noise and air quality impact can technically be adverse but not be deemed to be so adverse as to be deemed to harm amenity.
		Whereas unacceptable is the limit whereby amenity is considered to be harmed.

Parish Council Response

- The comments are noted
- The policy is considered to be as strong as national and local strategic policies will allow.
- Neighbourhood plans cannot go against the strategic policies of Local Plans. The Parish Council have been challenging the planned growth through the Local Plan examination process.
- Para 5.4 will be amended to reflect the comments from Ipswich BC

Proposed changes

• Amend second sentence of Para 5.4 as follows:

All development sites will need to have particular regard to the potential for adverse <u>unacceptable</u> noise and air quality impacts on new development arising from the presence of the A14 and the capacity of the highways network to accommodate additional traffic resulting from the proposal.

Policy SPTN 2	Policy SPTN 2 Housing Mix		
V Durrant	If applicable	I believe the Neighbourhood Plan (NP) focus' on the needs identified within the village community, and should where possible prioritize the demand from local people initially. I consider too many 'buy to let' speculators are distorting the housing market, and especially housing costs. The design quality of new homes should and must be improved, especially on larger developments, such as Wolsey Grange, where the 'shoe box' design is considered poor.	
H Davies	-	I is important that developers build houses that are needed e.g. affordable housing & homes with fewer bedrooms as that is what is needed - ref the HNA NOT the houses that maximise their profits.	
J Webb	-	The Gov needs to define Housing Mix and affordable housing. Who can afford 2021 £200,000 in not affordable. At least 2 car parking spaces per house. Extras to have a car park which builders have to provide at a cost to users off road.	
C Fuller	-	needs to be set within the context of comments made in this consultation response	
J Pateman- Gee		There are three parts to this policy. The first addresses the desire to have more three bed development. Please note this will only apply to outline and full applications and not reserved matters. The word *shall" is great, but the following word of "emphasis" takes	

Name	Organisation	Comment
		away the strength. If you want 3 beds to be the highest proportion of the mix, say so. Highest proportion will only mean 51% unless you say otherwise.
		The paragraph about bungalows is meaningless filler. It states support, but it's doesn't state you will not support without bungalows. If you want bungalows, state that X% or a minimum has to be bungalows. Also don't give the developer an excuse to avoid bungalows as being out of keeping with the area. A bungalow doesn't have to look like all the bungalows of the 60s; that is a lot of the village. Bungalows can be more traditional single storey buildings of interest, maybe innovation.
		The last paragraph on affordable housing is good. However, if you want to improve, maybe define small clusters as no more than 4 units. The risk is that a developer will define small as 10 or 15 or something that suits them.
		Suggested Wording Change for this policy:
		The following is respectfully suggested for consideration:-
		In all housing developments of ten or more dwellings, there shall be a higher proportion of three-bedroomed homes within the proposed scheme, unless it can be demonstrated that:
		a) the particular circumstances relating to the tenure of the housing dictate otherwise; or b) the latest publicly available housing needs information adopted by the LPA and/or Parish Council identifies a need for a different housing mix for Neighbourhood Plan Area.
		To ensure suitable access to the housing market for all parts of society, including those less mobile, there shall be a minimum of 1 bungalow (single storey with no accommodation in the roof) per 10 dwellings provided.
		Proposals that include affordable housing will be required to ensure that: i. it is designed to be 'tenure blind' (so that it is indistinguishable from open market housing) either on site or, where schemes do not include onsite open market housing, the wider area; and ii. where appropriate, small clusters of affordable housing (clusters of no more than 5 units) are distributed around the larger site and
		indistinguishable from the housing mix.,
Dr Hoque	National Highways (former, Highways	Housing Policy SPTN 2 - Housing Mix Policy SPTN 3 - Affordable Housing on Rural Exception Sites We have noted the following statement stated in para 6.1, –
	England)	"The emerging Joint Local Plan (November 2020) identifies a requirement for at least 1,514 additional new homes in the parish

these 1,514 additional bad junction capacity
aree-bedroomed homes in the SNP, it implies that t it will limit the choice a, there may be a tea as well as different droom homes. We and type of new homes
of affordable housing. balanced communities, re, it may also licing the delivery of all" and simply referring ffordable housing is not
within a scheme of 10 or
ic Housing Market
view on the type and nent (HNA) prepared by

Name	Organisation	Comment
		2.17 This includes appropriate evidence demonstrating the need for larger family homes and a departure from the current SHMA (2019) allowing for a separate housing mix to be secured to that underpinning the Draft JLP. Policy SPTN 2 is therefore still considered to meet Basic Condition e) in Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).
	Suffolk County	Adaptable homes and an ageing population
	Council	The neighbourhood plan refers to an ageing population, and states in paragraph 2.8 that many residents are aged 65 or older. Paragraphs 6.14 to 6.16 discusses M4(2) and Lifetime Homes standards which is welcome, however it is suggested that these desires for accessible and adaptable homes could be set out in policy.
		While the neighbourhood plan cannot set a standard, it would be helpful to set out support for this kind of housing in the neighbourhood plan. The emerging local plan will be setting a requirement for the proportion of dwellings to be built to this standard, it would be positive if the neighbourhood plan could indicate its support in the meantime.
		As such, the following wording is recommended to be included in Policy SPTN2 Housing Mix, following the line regarding bungalows:
		"The provision of bungalows will also be supported where the proposal would not have a detrimental impact on the character of the area in the vicinity of the site.
		Support will be given for smaller 2 and 3 bedroomed homes that are adaptable (meaning built to optional M4(2) standards), in order to meet the needs of the aging population, without excluding the needs of the younger buyers and families."
		It is suggested that there could also be further considerations for the needs of residents who are living with dementia in the community, and the potential for making Sproughton a "Dementia-
		Friendly" village. The Royal Town Planning Institute has guidance on Town Planning and Dementia ¹ , which may be helpful in informing policies.
		¹ https://www.rtpi.org.uk/practice/2020/september/dementia-and-town-planning/
	Babergh District Council	The Policy is supported but could go further by specifying the percentage of 3-bed homes required based on the HNA information set out under para 6.12.
		We also recommend that criterion b). refers to ' <u>Neighbourhood</u> Plan area'

• Planning policies cannot control who buys property.

• The design policies of the Neighbourhood Plan have been introduced to seek to achieve a better quality of design in new development.

Name	Organisation Comment
•	The Plan seeks to achieve the delivery of houses that are needed locally.
•	The policy does not imply that there is no requirement for 4+ bedroom homes and criterion a) notes that a different mix, such as for affordable housing, can be
	provided if "the particular circumstances relating to the tenure of the housing dictate otherwise".
•	The policy will be amended to reflect the housing mix requirement from the Sproughton Housing Needs Assessment.
•	It is not considered necessary to remove the word "small" from the policy.
•	As noted in the County Council comments "the neighbourhood plan cannot set a standard" for housing and it is therefore not appropriate to amend the policy
	as suggested, but to leave this matter to the Building Regulations.

- The policy will be amended to delete reference to the character of the area. There is, however, no evidence to support a particular minimum requirement for bungalows.
- We feel that the actual size of clusters should be dictated by the design philosophy for the site rather than specifying a specific size for the cluster.

- Amend Policy SPTN2 to require 60% of new developments of 10 or more homes in the Neighbourhood Plan Area to be 3 bedroomed dwellings
- Amend Policy SPTN2 to remove reference to bungalows having a detrimental impact on the character of the area.

Policy SPTN	3 Affordable Hou	using on rural exception sites
V Durrant	If applicable	This is exactly what must happen rather than just being given 'lip service' and then being deleted/overlooked for spurious 'financial viability' reasons.
J Webb	-	Some "Council Housing" for those who cannot afford to buy.
P Powell	-	Again However, The amendments proposed to the JLP by BMSDC removed much of SP03 and therefor limitations on rural development. The Inspector then questioned the relevance of exception sites. It seamed to me their thoughts were that if those limitations had been removed was there any relevance to exception sites as no exception would be required. I do not think any indication was given how they might direct on these issues.
C Fuller	-	I believe affordable housing should be delivered within a suitable scale of housing growth where it meets the tests of sustainable development at strategic and all subsequent levels, set within the context of comments made in this consultation response. There is a direct conflict between proposing or accepting 'minimum' housing growth targets at a strategic level (ie, maximum is undefined) and being able to demonstrate that this is environmentally sustainable.
Dr Hoque	National Highways (former, Highways England)	Housing Policy SPTN 2 - Housing Mix Policy SPTN 3 - Affordable Housing on Rural Exception Sites We have noted the following statement stated in para 6.1, – "The emerging Joint Local Plan (November 2020) identifies a requirement for at least 1,514 additional new homes in the parish between 1 April 2018 and 2037."

Name	Organisation	Comment
		While preparing the transport supporting documents such as Transport
		Statement/Transport Assessments, for these 1,514 additional new homes must
		include all committed development within any assessment carried out for any
		surrounding road junction capacity assessment.
D Taylor	-	Ensure sufficient affordable housing is provided by developers on sites already earmarked for new housing as there is already an
		extremely high proportion of development assigned within the parish in the joint local plan.
C Taylor	-	Bearing in mind the large amount of new housing already planned for the village, it seems unnecessary to consider development
		beyond the agreed settlement boundary. More pressure needs to be put on developers to facilitate affordable housing.
J Pateman-		There are a lot of issues with this policy and lots of loop holes for developers to exploit. However, the point is it is not clear. Why have
Gee		a policy on Affordable Housing when the JLP and its associated Supplementary Planning Document in due course as well as the NPPF
		shall essentially supersede this whenever such affordable housing schemes come forward?
		There are lots of problems, some examples:
		- What is small scale? 5 or 50. A developer will say 50+
		- "is for people that are in housing need because they are unable to buy or rent properties in the village at open-market prices.
		Once you define "the village", how do you prove this and be consistent and fair? By the way less and less can afford to live in
		the "the village", so that's a lot of people with proven need?
		- "paragraph 78 of the NPPF" Dont reference paragraphs of NPPF, it changes almost every year and just changed in July 2021.
		- Small number of market homes, small again is any number and a floodgate to open.
		- The last section refers to the countryside, but the point of this policy is exceptional and thus it is always the countryside!
		Also you don't need to apply more design criteria to this policy when you have a design policy that applies to the proposal in any event. However, if the policy is so desired, it is rewritten below in a form that would be harder to break and will not be out of date so fast.
		Suggested Wording Change for this policy:
		Proposals for the development of small-scale (not more than 9 units) secured affordable housing schemes (as defined as Affordable by the most up to date NPPF), on rural exception sites outside the settlement boundary, will be supported where there is a demonstrated proven
		local need and provided that the housing:
		i. remains affordable in perpetuity secured by legal obligation;
		ii. is offered, in the first instance, to people with a demonstrated local connection to Sproughton, as defined by the Gateway Home Choice
		Based Lettings Scheme (as may be amended or replaced). Where there is no local connection demonstrated, a property should then be
		offered to those with a demonstrated need for affordable housing in neighbouring villages before wider afield.
		iii. proposals shall demonstrate that a local need exists which cannot otherwise be met by applying normal planning policy for the
		provision of affordable homes in association with market housing.

Name	Organisation	Comment
		In exceptional circumstances, market dwellings will be permitted with the exceptional affordable housing scheme if it can be demonstrated: a) that no other means of viable funding the construction of the affordable homes is available; and b) the market housing is subsidiary by being no more than 25% of the affordable housing element of the proposal; c) the amount of market housing required is, as demonstrated through a viability assessment, the minimum required to deliver the affordable housing. Lastly, What are exceptional circumstances? Did you want to have an idea of these ahead of some developer surprising you?
	Babergh District Council	In the first paragraph, the NPPF reference should be to paragraph 72. The policy wording is otherwise consistent with what we have seen come forward elsewhere.

Parish Council response

- The NP policy is in accordance with the NPPF and therefore remains appropriate
- The local authority has yet to produce the Supplementary Planning Document and, when it does, it will not carry the weight of a Development Plan policy.
- It is not normally down to the developer to decide the size of an exception site as it is determined where a local housing needs assessment is undertaken by the Parish Council in conjunction with housing associations.
- Reference to the NPPF paragraph will be deleted
- The policy clearly states that market housing would only be considered where the viability of the scheme would be negative for the affordable homes. This is in accordance with the NPPF.
- It is important to emphasise that both tenures should be designed and constructed to the same design standards.

Proposed changes

• Amend the first sentence of Policy SPTN 3 as follows:

Proposals for the development of small-scale affordable housing schemes, including entry level homes for purchase (as defined by paragraph-78 72 of the NPPF) on rural exception sites outside the settlement boundary, where housing would not normally be permitted by other policies, will be supported where there is a proven local need and provided that the housing:

Chapter 6 Housing General Comments		
V Durrant	If applicable	I consider this esential to maintain and develop a thriving local community within the village.
H Davies	-	It is important that developers prove the viability of their proposals at the start so that any later claims that the development is not viable without cutting the number of affordable homes can be assessed in an open and transparent way.
P Powell	-	However as per comments made against policies 1 & 3.
C Fuller	-	needs to be adjusted to take account of comments made in this consultation response

Name	Organisation	Comment
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No. We object to the statement at paragraph 6.2 that:
	Tiopkins nomes	"a planning application for the development of the land East of Lorraine Way (Policy LA116) was refused planning permission for 49 homes in 2020 and subsequently turned down at a planning appeal. It was considered that development on this site would have a detrimental impact on the adjoining heritage asset. Given the fundamental reason for refusal, this is something that is unlikely to be addressed and brings into doubt the deliverability of the site. However, given that the Joint Local Plan allocates the site and, across the district, exceeds its the minimum housing requirement by over 20%, there is no need for the Neighbourhood Plan to allocate further sites for housing to make up for this loss. This will be a matter to be considered by the Planning Inspector examining the Joint Local Plan during 2021."
		This quote misinterprets the appeal decision which found that the proposed development would have a detrimental impact. It does not conclude that any development on the site would have a detrimental impact. As set out under question 1, the District Council has reviewed the appeal decision and has presented detailed further evidence to demonstrate the acceptability of the site allocation on heritage grounds.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.18 We support the content of Chapter 6, notably recognition that the Draft JLP has identified a housing required for the District, and identifies the emerging allocation at LA013 for 800 dwellings.
	Suffolk County Council	Paragraph 6.2 typo: "However, given that the Joint Local Plan allocates the site and, across the district, exceeds its the minimum housing requirement by over 20%,"
	Babergh District Council	The inclusion of any text that refers to Nationally Described Space Standards has received a mixed response from our NP Examiners, especially where an associated policy requires adherence to those standards. There is no such policy requirement in this draft Plan but to be consistent with the approach being taken elsewhere our recommendation is that para 6.17 and Table 1 (pg 22) are deleted in full. The following paragraphs will need re-numbering as a consequence.
		Through our internal consultation, the last paragraph in 6.7 came under specific scrutiny. We see the limitation on the number of permitted storeys in a dwelling is not carried through to policy text but do note that SPTN 16 relies on a checklist derived from the AECOM Design Guidelines and Codes document. Within this:
		• DC01 part 'i' (pg 33) states that 'large scale development is not appropriate for the village and should be avoided' and seems to conflict directly with some of the potential allocations.
		• DC03, part 'i' (pg 38) relates to properties being no more than two storeys high, which seems unduly restrictive.

Name	Organisation	Comment
		• DC03, part 'iii' (pg 38) works better because it relates to the surroundings, whilst 'l' isn't entirely consistent with that more flexible
		approach, especially noting the supporting text which notes that the village/parish has examples of one, two, 2.5, and three-storey buildings.
		We therefore seek an amendment to DC03 (pg 38) of the Design Guidelines document which will see part 'i' read as follows: i. Development within the Parish should be of a scale and design to reinforce the locally distinctive character of the area. Development will generally be expected to be of no more than two storeys in height unless specific justification is given and when having regard for ii. and iii. below.
		Para 6.2
		Delete the word 'its' from before the words 'the minimum' in the fourth sentence.
	Ipswich	In paragraph 6.2 references are made to the "Joint Local Plan". It is recommended that "emerging" is added before these references to
	Borough Council	make clear to readers that this is an emerging development plan document and not adopted.
		Paragraph 6.11 directs readers towards the AECOM Housing Need Assessment (HNA) (2020). The HNA states that "The proposed
		Neighbourhood Plan period starts in 2021 and extends to 2036, therefore comprising a planning period of 15 years." As the
		Neighbourhood Plan period is proposed to cover 2018 – 2037 the evidence base should cover this entire period. It is therefore recommended that this evidence is updated to adequately cover the entire plan period for soundness.
		The Borough Council has some concerns that the Design Code proposed is too prescriptive and needs to ensure that it does not negatively impact on existing local plan site allocations and existing planning permissions which is beyond the remit of the Neighbourhood Planning process and national objectives.
		For example, the standalone reasoned justification paragraph beneath the space standards states that "Three storey homes are not permitted under the Neighbourhood Plan Design Code. Any development permitted shall be restricted to up to two storeys in height. For the avoidance of doubt this does not permit two and a half storey buildings with accommodation in roof spaces."
		The Council does have concerns that imposing a blanket ban on three-storey developments and roof extensions is unlikely to be deemed to be sound, particularly as the Design Code is not itself a policy within the Neighbourhood Plan and is a standalone document that is not subject to the same level of status as the Neighbourhood Plan itself.
		In addition, roof extensions are often classified as 'Permitted Development' and often do not require planning permission.
Parish Council r	response	
The com	ments are noted	

Name	Organisation	Comment
at Lor with t It is a The D parish The D	rraine Way) be del the Joint Local Plar greed that Para 6. Design Codes and 1 n. Design Code canno	Local Plan Inspectors issued a note to the District Council recommending that all new allocations in the Joint Local Plan (including the site eted and that Settlement Boundaries revert to those in the adopted Local Plan. As such, the Neighbourhood Plan is not in contradiction in as the site in Lorraine Way is not now to be allocated in the Joint Local Plan at this time. 17 adds little to the Plan given that the matter is addressed in the Joint Local Plan. the separate Landscape Appraisal have both found that three storey development would have a significant impact on the character of the ot influence proposals that already have planning consent. tessary to amend the evidence base.
Proposed cha	anges	
-	—	vill be amended to note the change in circumstances of the Joint Local Plan.
_	, I	
Policy SPTN	4 - Employment S	Sites
V Durrant	If applicable	I strongly support this, but it is important to ensure that para 7.6 is adhered to avoid the adverse impact that has resulted from the construction of the La Doria building and its 'non compliance' with the maximum planned building heights set out for the development. I also believe that the colour of such buildings is important and must be chosen to 'blend in' with its surroundings, and NOT stand out from them.
H Davies	-	It needs to be clear that an increase in noise, traffic & pollution needs to be mitigated.
C Fuller	-	The text adjusted 'The retention detrimental impact on the landscape character, environmental and heritage assets'. National planning policy recognises that brownfield and employment land can support significant biodiversity and can contribute to
		important green infrastructure
J Pateman- Gee		An emerging theme with these policies is being unnecessarily wordy. For example "existing employment and other business use" in this policy. If it's not existing then what other business would it be?
		Again this policy has lots of issues as it tries to cover everything and by doing too much it's weaker for it and undefined. For example, what does " <i>Proposals for non-employment or business uses that are expected to have an adverse impact on employment generation</i> " mean? Just how would a planning officer in defendable terms prove a proposed use would have an adverse impact on employment generation? generation?
		The real problem is this policy fails to achieve what it probably set out to achieve. At no point does this policy prevent the loss of an employment site. This policy supports existing businesses; it also has a criteria for proposals for non employment types of

Name	Organisation	Comment
		applications; however it has nothing to stop or provide a criteria for the loss of employment. Read it through again with this in mind and you will see.
		Assuming that these points can be addressed, we can then turn to the criteria.
		A) This seeks to ask for evidence that attempts to sell have been made. Sadly it provides no criteria on how or what is evidence should be submitted or how long it should cover.
		B) This set out very subjective judgement that environmental harm that may outweigh economic use. This a valid criteria, but very much a judgement.
		C) This provides we can loss a employment use if an alternative use or mix of uses would assist in regeneration and offer greater benefits to the community in meeting local business and employment needs. I have never come across anything like this and would not know how to prove that something is better for community and business than an existing business. Does this simply mean that a business that might have a few more employees than the existing one can be supported? What will the parish do if it is argued that housing generates around 3 jobs per house and provides customers for local businessesdoes this not comply if the existing business just employs a couple.
		D) This states we can remove an existing use (once the first part of this policy is changed) if it is for an employment related support facility, such as employment training/ education or workplace crèche. So this would allow the loss of the Wild Man Pub if this was proposed as a crèche.
		E) Same as C, but with the addition of sustainable use, but such uses are not define and this represents a significant risk.
		The policy states you only need to comply with one of the criteria. Sadly this means developers will always choose the easiest one. My money would be to prove that the business leads to environmental harm as this normally always is the conflict of an existing business near residential use regardless of economic benefit. This criteria is also the easiest to find support for locally, especially if you live next door to say the noisy pub.
		The Joint local plan also has a retention of employment use policy proposed and this one includes marketing campaigns and other criteria. Therefore it is questioned why this one at NP level needs to be so overly complex and instead perhaps it should be worded so it marries up with the joint local plan version and covers exceptions (such as creches) that the parish wishes to put forward. In the end both the new joint local plan and this neighbourhood plan will form the same development plan and so the opportunity for the neighbourhood plan is the detail at a local level and not necessarily just a repeat what the joint local plan already says.

Name	Organisation	Comment
Dr Hoque	National	Business and Employment
	Highways	Policy SPTN 4 - Employment Sites
	(former,	Policy SPTN 5 - New Businesses and Employment Development
	Highways	Policy SPTN 6 - Farm Diversification
	England)	National Highways (former Highways England) is already discussing a few of the proposed employment development applications. The Para 7.1 has mentioned few
		employment areas located between Junction 54 of the A14 and the main railway line and three other employment areas- o Sproughton Enterprise Park,
		o Farthing Road Industrial Estate
		o Thompson and Morgan
		o Wolsey Grange 1 and
		o the Wolsey Grange Masterplan Area (interchange 55).
		We support the statement in para 7.5 –
		"While acknowledging the content of Policy SP05, any expansion of these and other employment sites must not result in unacceptable increases in traffic on the roads through Sproughton village or roads that lead to the sites, either
		through a significant increase in the number of people working on the site or through lorry movements servicing the site."
		They also must not result in a severe impact upon the A14 or its junctions.
Parish Coun	cil response	
• The	comments are note	d.
• The	application form wo	ould normally state the number of jobs currently at the business and the number as a result of the proposal. That would be a good
start	ting point for the off	ficer.
• It wo	ould be unreasonabl	le not to permit an alternative use of a site and leave it vacant. The policy requires evidence to demonstrate that the site and/or use is no

- It would be unreasonable not to permit an alternative use of a site and leave it vacant. The policy requires evidence to demonstrate that the site and/or use is no
 longer suitable.
- The policy will be amended to bring it in line with the emerging Joint Local Plan (LP13) which requires a period of sustained marketing for 6 months.
- The approach to alternative uses in c) is in accordance with Policy LP13 of the emerging Joint Local Plan.
- The Wild Man pub is not a business use under the Use Classes Order but is Sui Generis.

Proposed changes

• Amend Policy SPTN4 to require marketing periods as set out in Policy LP13 of the emerging Joint Local Plan.

Policy SPTN 5 New Business and Employment Development		
V Durrant	If applicable	I do have trouble with some of the wording here. Who defines what is 'unacceptable and to whom, and especially the definition of 'residential amenity'. These issues are completely overlooked or over-ridden in efforts to persuade developers to go ahead, such as happened with the 'La Doria' building.

Organisation	Comment
-	It is important the new buildings comply with the design code and blend into the site with no impact on wildlife or biodiversity.
-	Needs to be set within the context of comments made in this consultation response
	It's assumed that outside the settlement boundary you would also want new business to also not harm residential amenity, heritage assets and the highways network as stated for businesses within the settlement boundary. This policy doesn't state this.
	Instead, criteria a and b apply to business outside the settlement boundary. Criteria a is fine. Sadly criteria b is a floodgate. The first problem is the idea of " small scale". 20 caravans are small scale for me in my profession. So would this scale match the parish expectation? Essentially this allows any form of use in the countryside, if small (subjective), appropriate (subjective again and no definition provided) and needs to be there in the countryside (very subjective and again no definition of what need may be in mind).
	Given the lack of business allocation and space in the settlement of Sproughton, this would be an easy argument to get my "small" commercial interest in the countryside if I was a developer.
	The last paragraph that starts "Where possible" is a lost cause. Begging for some to be possible or "should" will be ignored and has no bearing or strength to affect a planning decision or influence a developer. State what you want, don't give them a choice.
National Highways (former, Highways England)	 Business and Employment Policy SPTN 4 - Employment Sites Policy SPTN 5 - New Businesses and Employment Development Policy SPTN 6 - Farm Diversification National Highways (former Highways England) is already discussing a few of the proposed employment development applications. The Para 7.1 has mentioned few employment areas located between Junction 54 of the A14 and the main railway line and three other employment areas- o Sproughton Enterprise Park, o Farthing Road Industrial Estate o Thompson and Morgan o Wolsey Grange 1 and o the Wolsey Grange Masterplan Area (interchange 55). We support the statement in para 7.5 – "While acknowledging the content of Policy SP05, any expansion of these and other employment sites must not result in unacceptable increases in traffic on the roads through Sproughton village or roads that lead to the sites, either through asignificant increase in the number of people working on the site or through lorry movements servicing the site." They also must not result in a severe impact upon the A14 or its junctions.
	- - - National Highways (former, Highways

Name Organisation Comm	Organisation Commen
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- The comments are noted,
- Given the other policies elsewhere in the Neighbourhood Plan, in particular SPTN13 and SPTN16, it would be appropriate to amend the policy to delete references to residential amenity, heritage assets and the highway network in the first sentence of the policy.
- Criterion b) is considered appropriate and not in need of amending.
- Policy SPTN4 and the Policies Map identifies large areas of employment use where sites are available for additional enterprises.
- The last paragraph provides a starting point for considering proposals. If this is not possible then the proposal would represent a new building outside the Settlement Boundary and would have to take account of landscape impact, as stated elsewhere in the Plan.

Proposed changes

• Amend first sentence of Policy SPTN5 as follows:

Proposals for new business development will be supported where sites are located within the Settlement Boundaries identified on the Policies Map where they would not have an unacceptable impact on residential amenity, heritage assets and the highways network.

Policy SPTN	6 - Farm Diversif	ication
V Durrant	If applicable	I believe that care must be taken when allowing such developments and that they do not serve as a pre-cursor and precedent for the
		unacceptable developments of housing sites.
C Fuller	-	Text needs adjusting
		'Proposals for new business residential amenity, environmental and heritage assets and the highways network'
		'Proposals for equestrian effect on the character, environmental quality and appearance of the locality'
J Pateman-		The first paragraph on the location of new business is a repeat of NP policy 5. This needs to be removed.
Gee		
		The rest applies to equestrian use and is fine. In planning the word "impact" is used more than "effect", but I do not think it matters.
		Last thought, Equestrian is not Agricultural use in planning terms and so it is unclear why this policy is called Farm Diversification.
Dr Hoque	National	Business and Employment
	Highways	Policy SPTN 4 - Employment Sites
	(former,	Policy SPTN 5 - New Businesses and Employment Development
	Highways	Policy SPTN 6 - Farm Diversification
	England)	National Highways (former Highways England) is already discussing a few of the
		proposed employment development applications. The Para 7.1 has mentioned few
		employment areas located between Junction 54 of the A14 and the main railway
		line and three other employment areas-

Name	Organisation	Comment
		o Sproughton Enterprise Park,
		o Farthing Road Industrial Estate
		o Thompson and Morgan
		o Wolsey Grange 1 and
		o the Wolsey Grange Masterplan Area (interchange 55).
		We support the statement in para 7.5 –
		"While acknowledging the content of Policy SP05, any expansion of these and
		other employment sites must not result in unacceptable increases in traffic on
		the roads through Sproughton village or roads that lead to the sites, either
		through a significant increase in the number of people working on the site or
		through lorry movements servicing the site."
		They also must not result in a severe impact upon the A14 or its junctions.
M Levett	-	I support SPTN6 fully but observe that light pollution is a major factor in exiling wildlife and visual amenity at night
	Babergh	Given the two issues are discussed separately in para's 7.9 and 7.10, consideration should be given to having separate policies on Farm
	District Council	Diversification and Equestrian Development. Alternatively, the policy title could be amended to covers both.
The cThe f	cil response comments are noted	l. y which repeats Policy SPTN5 will be amended.
The cThe fThe p	cil response comments are noted first part of the polic policy title will be an	l. y which repeats Policy SPTN5 will be amended.
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Name	Organisation	Comment
P Powell	-	Clerical note: Section 7.1: the I55 commercial development is not part of Wolsey Grange1 which is a Taylor Wimpey development, It is a separate developer but it is part of the land allocated in Policy CS7 which is the Ipswich Fringe Strategic Development Site in which both WG1 and I55 sit.
C Fuller	-	section 7.10 - Need to adjust text 'Where such proposals wider landscape, environmental Notedassets and the countryside
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No opinion
	Boyer on behalf of Taylor Wimpey UK Ltd	2.19 We largely support the content of Chapter 7 (Business and Employment) and Questions 8-11. We have no further comments to make on this Chapter/these questions.
	lpswich Borough Council	Paragraph 7.1 references "greater Ipswich" but it is recommended that "Ipswich Strategic Planning Area (ISPA)" is used instead for consistency with the emerging B&MS Joint Local Plan. This is because Babergh/Mid Suffolk districts, East Suffolk and Ipswich work together to meet the employment needs within the Ipswich Functional Economic Area.
		There should also be reference to the relationship of Sproughton to Ipswich and the identification of Ipswich as one of six 'Priority Places' in the Economic Strategy for Norfolk and Suffolk.
		Paragraph 7.4 references Sproughton Enterprise Park as a 'strategic employment location' which is welcomed. However, it goes on to refer to the 'remaining four plots of the Enterprise Park' and the need to be 'sensitive to the landscape, biodiversity and heritage assets'.
		The Enterprise Park is controlled through the requirements set out in conditions attached to the outline planning consent which means the principles of the development have already been established. In addition, the height of any development is limited to 28m through condition attached to the planning consent, and road and infrastructure requirements have been agreed and set out through the parameters plan which was part of the outline planning approval.
		Proposals are set in place to develop a local nature reserve which is being taken forward by a specialist consultancy and the outline planning consent sets out 36 conditions which need to be delivered as part of the development. The use, height, roads, infrastructure and layout is covered through a master plan and it is misleading to refer to four plots remaining as the development of the remaining acreage of the site is dependent on the end user. For example, it could be a single end user and reference to acreage is therefore more appropriate than reference to plots.
		In paragraph 7.5 there is reference to expansion of these (including the Sproughton Enterprise Park) 'must not result in unacceptable increases in traffic on the roads through Sproughton village or roads that lead to the sites'

Name	Organisation	Comment
		In terms of the Sproughton Enterprise Park, a Site Wide Travel Plan has already been agreed with Suffolk County Council and the Borough collects data which is sent to the county for monitoring traffic impact so traffic is already being monitored closely. It also needs to be recognised that the A14 is a strategic highway of regional and national importance linking the Suffolk coastal ports to the Midlands and beyond and via the A12 junction to London. In terms of the Sproughton Enterprise Park, the parameters for the full development of the site is already under the control of an existing outline planning consent which in planning terms is a heavier material consideration in terms of site development than Polic SPTN4 in the draft Neighbourhood Plan. In addition, the Parish Council will have been consulted on the outline application and
	Babergh District Council	 matters raised taken into account in determining the planning consent. It is not clear where the 'increased 15%' figure has come from. To recognise that the number of people working from home has increased and perhaps tie that in with the mention of covid-19 in the Foreword, might we suggest that the penultimate sentence be split and now read: "Home working is popular in the parish with the 2011 census showing 15% of those in employment working from home. That figure likely to have increased since then and, perhaps, has accelerated even further as one the longer-term impacts on work patterns cause.
• The	cil response comments are noted	
 The e The e Refe It is e Para 	comments are noted outline planning per rence to the Ipswich not relevant to refere graph 7.3 will be am	l. mission at Wolsey Grange includes the employment land. Strategic Planning Area rather than greater Ipswich will be made. ence Ipswich as one of six 'Priority Places' in the Economic Strategy for Norfolk and Suffolk.
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 The offer the off	comments are noted outline planning per rence to the Ipswich not relevant to refere graph 7.3 will be am nanges and first sentence of le end fourth sentence of ng is popular in the p ne then and, perhaps	I. mission at Wolsey Grange includes the employment land. Strategic Planning Area rather than greater Ipswich will be made. ence Ipswich as one of six 'Priority Places' in the Economic Strategy for Norfolk and Suffolk. ended. Para 7.1 to refer to the Ipswich Strategic Planning Area rather than greater Ipswich. of Para 7.3 as follows: parish with fifteen <u>15%</u> percent of those in employment working from home in 2011, a proportion that is likely to have increased 15%

Name	Organisation	Comment
D Taylor	-	Not in agreement with any development taking place in the area of Local Landscape Sensitivity
C Taylor	-	Development should not be permitted in these areas.
J Pateman-		Nothing wrong with this one and I understand and support the point. Not sure if it will be upheld by planning or inspectors on
Gee		appeal. I suspect the value of this lies in the fight of people behind it at the appropriate time.
	Boyer on behalf of Taylor	2.20 We strongly object to Policy SPTN 7 and specifically the accompanying policies map which designate Valued Landscape. 2.21 Policy SPTN 7 seeks to designate large swathes of allocation LA013 as a valued landscape, whereby development should only be
	Wimpey UK Ltd	permitted where it seeks to protect and enhance the special landscape qualities of the area. This suggests that development within valued landscapes should be resisted, which would appear to align with NPPF (2021) Paragraph 174 stating that planning decisions should protect and enhance valued landscapes. Whilst we support and acknowledge the need to protect valued landscape, we do not agree with the areas that have been designated. As a whole this Policy is restrictive and does not provide a positive policy approach. 2.22 Notwithstanding our fundamental objection to the Pre-submission SNP evidence base which supports the designation of valued landscapes (as discussed further below and in the following Section), as large parts of LA013 are now being sought to be kept free from development this, in turn, constrains large swathes of the site's developable area.
		2.23 This could inhibit the delivery of 800 dwellings on emerging allocation LA013 and would therefore conflict with the Draft JLP as it would prevent the comprehensive delivery of allocation LA013 which contributes to the Draft JLP housing numbers. In turn, Policy SPTN 7 fails to meet basic condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011) in so far as it conflicts and undermines strategic policy SP04 (Table 04) and the minimum' homes necessary in the Draft JLP.
		2.24 Policy SPTN 7 has also failed to recognise the implications it will have on housing delivery as set out within Table 1 (Page 17) of the Pre-submission SNP.
		2.25 We also have significant concerns with regards to the landscape evidence base underpinning Policy SPTN 7, such as the Neighbourhood Plan - Landscape Assessment (Alison Farmer Associates; February 21), which does not align and arguably undermines the evidence base underpinning the Draft JLP.
		2.26 As discussed in the following Section, the Draft JLP is supported by a robust evidence base, which includes a Landscape Sensitivity Assessment of the SHELAA Sites. Emerging allocation LA013 was assessed as part of this process and considered to be of moderate sensitivity to residential development. The Landscape Assessment supporting the Pre-submission SNP considers the site to have high sensitivity and also claims that the site has little to no capacity for further development, which clearly does not align with the conclusion reached by BMSDC and supporting evidence to the Draft JLP.

Name	Organisation	Comment
	Suffolk County Council	Policy SPTN7 Area of Local Landscape Sensitivity and SPTN8 Settlement Gaps are welcomed. While the Landscape Appraisal seems to suggest just one relatively large area to the north-east of the village to function as settlement gap (extent not clear, as off the map), the neighbourhood plan contains several settlement gap corridors. The depiction on the map suggests linear zones along some of the roads. It is unclear, how much area would be included within the settlement gap. Wider areas would be more effective in preventing coalescence.
 The late The Late The definition The Location The Location The Joint The Note Matter 	omments are noted and around Redhou ndscape Appraisal esignation would h ocal Plan examinatione Way) be deleted int Local Plan as the eighbourhood Plan rs relating to the si	d. Ise cottages is included in the Valued Landscape designation under the same policy. I did not conclude that other suggested areas qualified as sensitive landscape. Have the same weight as any other policy in the Development Plan and would be the starting point for making decisions. Ion Inspectors issued a note to the District Council recommending that all new allocations in the Joint Local Plan (including the site at d and that Settlement Boundaries revert to those in the adopted Local Plan. As such, the Neighbourhood Plan is not in contradiction with e site in LA013 is not now to be allocated in the Joint Local Plan at this time. In Landscape Assessment is more detailed than that used to support the JLP. te known as LA013 which will need to be addressed at the time Part 2 of the JLP is prepared. olicies Map is considered to be clear as to the extent of the Settlement Gaps
Proposed cha • None	nges	
	- Settlement Gap	
V Durrant H Davies	If applicable -	I completely agree with this policy, but will it have the necessary powers to prevent this happening. Creeping coalescence MUST be prevented. Might be worth including that the size of the Settlement Gap cannot be reduced in any direction.
C Fuller	-	There may need to be more than shown to deliver quality of life and sustainable development objectives accounting for comments made in this consultation response
J Pateman- Gee		The word "help" implies failure is expected. Take out the word help.

Name	Organisation	Comment
		Why mention SPTN 1? This policy has no criteria to be in conformity with except to be in settlement boundary and this would be in direct conflict with the intention of this policy to have gaps of development so the village is not just a part of lpswich. Take out help and sptn1 and we have a decent policy in terms of wording. I have never seen this tried before, normally the approach is having important views and local greens etc to achieve the same effect. This is far more direct. The risk is that the examiner will mine the nppf to find a way to dilute or remove this. Not least as it may read as restrictive to housing supply. Might be worth looking at the nppf with this in mind to see if anything else can be drawn in. My suggestion would be to list the gap areas and importance. For example, The one to the river is a gap of importance due to main A14, river setting, the unique sproughton mil and church, and village use of the millennium green and it's rural village setting. Bramford direction is harder given the pigeon disaster and the development approved at Bramfordbut maybe the last remaining field is the key point now. Around Red House is the value of this former grand farmstead and the one remaining connection of Church lane leading under the main road to the village. New wording could be: The open and undeveloped nature of the Settlement Gaps, as identified on the Policies Map, will be protected from development, other than agricultural use and householder development, to help prevent coalescence and retain the separate rural identity and character of the settlements. Development thic is otherwise in conformity of all other policies of the Neighbourhood Plan will only be permitted within a Settlement Gap where: i. it would not underrnine the physical and/or visual separation of the settlements; and ii. it would not underrnine the integrity of the Settlement Gap, either individually or cumulatively with other existing or proposed development.
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No. It is clearly inappropriate to identify a Settlement Gap on a site that is allocated in the JLP (i.e. land East of Lorraine Way (Policy LA116)). As set out under question 1, the PPG is clear that where a Neighbourhood Plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between their policies. The inclusion of a proposed Settlement Gap on a site that is proposed to be allocated in the emerging Local Plan clearly demonstrates a failure to reach such an agreement and renders the Neighbourhood Plan contrary to the PPG and therefore to the basic conditions.

Organisation	Comment
Organisation Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust Boyer on behalf of Taylor Wimpey UK Ltd	Comment Draft policy SPTN8 (Settlement Gaps) seeks to prevent coalescence and retain the separate identity of "the settlements". Whilst the supporting text for this policy (paragraph 8.11) refers to preventing coalescence of the parish with the urban area of [pswich and the villages of Bramford, Burstall and Copdock and Washbrook, the 'settlement gaps' as currently identified on the policies map do not reflect the evidence base. The SNP Landscape Appraisal refers to Ibywich and Bramford at section 4.7 of the document, but does not refer to the other settlements noted within the supporting text of the SNP, which are some distance from the settlement boundary. Notwithstanding the restrictions on development that are already imposed by Policy SPTN1, development within the majority of the "settlement gaps" as shown on the policies map would not result in coalescence of Sproughton with the neighbouring settlements. We therefore suggest that the policy is either deleted or the settlement gaps are revised to reflect the SNP Landscape Appraisal. 2.27 Whils we do not object to the principle of Policy SPTN 8, we object to the designation of parts of Hadleigh Road as a settlement gap and question how Policy SPTN 8 will be implemented. 2.28 Policy SPTN 8 states that the open and undeveloped nature of the Settlement Gaps will be protected from development to help prevent coalescence and retain the separate identity of the settlements. It is unclear, however, how land along parts of Hadleigh Road and Church Lane are identified as fundamental in preventing coalescence of the Parish with the urban area of pswich and the villages of Bramford, Burstall and Copdock and Washbrook, noting the physical barrier of the A14 and changing character from the underpass at Church Lane. 2.29 The Pre-Submission SNP's supporting documents includes a Landscape Appraisal prepared b
Suffolk County Council	gap". Policy SPTN7 Area of Local Landscape Sensitivity and SPTN8 Settlement Gaps are welcomed. While the Landscape Appraisal seems to suggest just one relatively large area to the north-east of the village to function as settlement gap (extent not clear, as off the map), the neighbourhood plan contains several settlement gap corridors. The depiction on the map
	Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust Boyer on behalf of Taylor Wimpey UK Ltd

Name	Organisation	Comment
		suggests linear zones along some of the roads. It is unclear, how much area would be included within the settlement gap. Wider areas would be more effective in preventing coalescence.
Parish Counc	il response	
 The p The fi Policy There In De (East Devel that if Given alloca 	rst sentence of the SPTN 1 also allow is no need to list cember 2021 the J of Lorraine Way) is opment outside the twould not result that the allocation tions will need to that any developed	d. hbourhood Plan are strong enough without stating that the gaps should not be reduced. e policy will be amended to delete the word "help". <i>us</i> development outside the Settlement Boundary where it is in conformity with the NPPF. Hence the reference. the gap names as they are shown on the Policies Map. oint Local Plan Inspectors instructed Babergh District Council not to proceed with the current allocations. Therefore the site in question is no longer allocated. The Settlement Boundary would firstly have to conform with Policy SPTN1 and, should it meet those requirements, will then have to ensure in coalescence of settlements. In for Wolsey Grange 2 (Policy LA013) is now being removed from the Joint Local Plan, the matter of coalescence from any future be addressed at that time. ment is likely to result in construction along road frontages, the approach of how the important gap is indicated seems perfectly ent with other Plans.
The open and	id first sentence of	^F Policy SPTN8 as follows: ure of the Settlement Gaps, as identified on the Policies Map, will be protected from development to help prevent coalescence and retain lements.
Policy SPTN	9 Protection of in	nportant Views
V Durrant	If applicable	Again, I completely agree with this, but will our NP be sufficiently robust and have the power to follow this through.
P Wood	-	Although this was totally disregarded with regard to De Lorio
H Davies	-	Protection of longstanding views is critical - can we say that the extent & direction of the view must not be reduced.
C Fuller	-	Needs to be set within the context of comments in this consultation response
D Taylor	-	Please also consider the important view of the parish and its setting coming over the brow of the hill on the B1113 past the entrance to the Beagle to the north east and north west
C Taylor	-	Add the view northwards from the brow of the hill near the entrance to Premier Inn & Beagle
S Lavington	-	Map 6: important views (page 36). This map pays too little attention to the approach to Sproughton from the south along the B1113. Mature woodland, and in particular some fine oaks enjoying TPO status, surround listed buildings as the main area of High Street settlement is entered. These views have

Name	Organisation	Comment
		community value which should be recognised by appropriate symbols on Map 6. The general look and feel of the entrance to
		Sproughton village from the south is distinctive and needs to be preserved.
S Catermole	-	In particular for Hadleigh Road/Chantry Vale area.
J Pateman- Gee		This policy is guilty of referring to built up area and settlement boundaries. Are these the same or different? You need to ensure the language is consistent across the document.
		"Should" is a choice meaning that everything that follows this word can be ignored. Please make it required by using "shall" or even "must". The rest is subjective judgement. How about adding development over 7 metres will not be supported in these important views areas or something similar that is tangible.
	Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust	Policy SPTN9 states that "distinctive" views from pubic vantage points including those identified on the policies map, shall be maintained. It is unclear whether the use of the term "distinctive" as opposed to "important" is relevant. This should be clarified or alternatively we suggest that consistent language should be used to avoid confusion in respect of how the policy is applied in practice. Furthermore, we would suggest that the requirement to "maintain" views is inappropriate. This suggests that any change to an existing view is unacceptable, effectively creating a presumption against all development. Instead, the policy should require an assessment of the impact of proposals on views from public vantage points taking into account any mitigation that is proposed as part of the scheme. This approach will ensure that the key features of "important views" are preserved, whilst not preventing development where it is consistent with other policies in the SNP.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.33 We do not object to the principle of identifying important views across the Parish and acknowledge Policy SPTN 9 in seeking to protect such views.
		2.34 We also acknowledge that there are important views along Hadleigh Road, which should be considered and assessed when delivering development on emerging allocation LA013.
		2.35 Planning Application (DC/21/02671) is supported by a Landscape and Visual Impact Assessment (LVIA), which assesses a number of viewpoints both across emerging allocation LA013 and from neighbouring areas and PROW.
		2.36 These viewpoints were discussed at length and subsequently agreed with the Councils' Landscape Officer as needing to be assessed as part of the proposed development. Whilst viewpoints from the A1071 and A1214 were included, it is noted that those identified in the Landscape Appraisal prepared by Alison Farmer Associates (February 2021) and illustrated on Map 6, were not identified as viewpoints necessitating assessment by the Council.
		2.37 Each of the agreed viewpoints with the Councils' Landscape Officer were photographed and form part of the Technical Appendices underpinning the Environmental Statement, which supports the planning application.

Name	Organisation	Comment
		2.38 Views along the A1071, Hadleigh Road and A1214 were assessed as part of the LVIA. With appropriate mitigation, secured through the implementation of the Parameter Plans submitted with the application, the impact on such views would be no greater than moderate – slight adverse and not significant.
		2.39 The Council's Landscape Officer (30.07.2021) has also subsequently commented on the planning application and confirmed: "We agree with the assessed level of effect on landscape receptorsIn terms of visual amenity, we agree with the chosen visual receptors and have no concerns regarding the number of viewpoints or verified views."
		2.40 We remained concerned that a number of the views identified within the Pre-submission SNP do not align with those requested from the Council as viewpoints needing to be assessed as part of a future application.
	Suffolk County Council	The policy refers to the identified views indirectly by referring to Map 6, which shows them. Part i. and part ii. are given a wider remit than the protection of specific views, and work towards a parish wide approach to safeguard the visual characteristics of the parish.
		It would be easier to talk about the 19 individual identified views, if they had been systematically named and numbered and shown in photographs referenced to Map 6. Photographs could be in a supplementary evidence document.
	Babergh District Council	In SPTN9, at start of the first paragraph, replace the word 'Distinctive' with the word 'Important'. All the references on pages 36 and 37 are to important views, not distinctive views. The same generally applies to the separate Landscape Appraisal.
		Within the NP, but not necessarily in the policy itself, a numbered list of the Important Views, cross referenced to Map 6 and the Policies Maps would be helpful.
		There are some minor discrepancies between the locations of some views symbols on Map 6 compared with the Policies Map. We have identified the following, but you should check for others:
		• On Map 6, no view shown looking south from Lower Street across the Millennium Green, but this is shown on the Village Centre Inset Map (pg 62)
		• On Map 6, the location of the two views west of Church Lane and associated with the footpath across the field between Red House to the south and Red House Cottages to the north.

- The Policies Map will be amended to include the view from the B1113 north from The Beagle.
- The references to settlement boundary and built-up area boundary are considered appropriate.
- The policy will be amended to delate "distinctive" and replace it with "important"

Name	Organisation	Comment
that tl • Shoul conte • It is no	he current applicati d the Neighbourho nt of the Plan. ot considered neces	he Neighbourhood Plan are identified on the basis that mitigation has, rightly, not been secured through a planning application given on referred to is likely to be contrary to the currently emerging Joint Local Plan. od Plan be "made" before any planning application the Wolsey Grange area is considered, proposals will need to have regard to the ssary to mane and number each view. between Map 6 and the Policies Map will be addressed.
• Amen	d Policies Map to in d first sentence of _l	nclude the view from the B1113 north from The Beagle. policy to replace "distinctive" with "important". es Map to ensure consistency.
Policy SPTN	0 – Local Green S	paces
V Durrant	If applicable	BUT- I do not see any mention of the large 'green' space of the 'Island site' now owned by IBC, and am concerned that this will be overlooked. (See also comments on question 29).
C Fuller	-	Needs to be set within the context of comments in this consultation response
S Lavington	-	Map 8: Local green spaces (page 39). Too little attention is paid to the southern areas of the village, to either side (west and east) of the B1113. Based on NPPF criteria and especially on the well-used footpath connecting High Street to the sports field and the primary school, Monks Wood should definitely have been included on Map 8 and listed in Policy Spin 10 (page 40).
J Payeman- Gee		In this policy the local greens are in fact listed and I would recommend the same approach with local significant buildings and important views.
		However, the fundamental issue with this that once listed there is nothing to say what was the point of being a green in the policy. I assume the idea is that no development or limited development is proposed/supported for these areas, but this doesn't say that this is the intent in the policy itself. Please don't rely on the nppf as that is guidance, put a solid requirement of protection in the policy.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.41 Policy SPTN 10 identifies a number of Local Green Spaces, which includes a "Green triangle at the junction of Hadleigh Road with First Strokes swimming pool" (Green Space 10).
		 2.42 Paragraph 102 of the NPPF (2021) states that a Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) 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 c) local in character and is not an extensive tract of land

Name	Organisation	Comment
		2.43 Green Space 10 is approximately 395m2 and represents a thin strip of highway verge on the edge of Hadleigh Road. The Pre- submission SNP Green Spaces Assessment (prepared by the SNP Sub-Committee) recognises the highway verge as not being demonstrably special to the local community and does not hold a particular local significance. The highway verge lies within the ownership of the Highways Authority (see Appendix Three), it is unclear whether appropriate engagement has been undertaken with the Highways Authority. This area is subject to change as part of the development proposals at Land North of the A1071 (LA013) to ensure that access for all users can be delivered safely including those using the existing facilities. As those discussions have taken place with Suffolk County Council, we consider this space cannot be designated.
		2.44 The Pre-submission SNP Green Spaces Assessment (prepared by the SNP Sub- Committee) goes on to state that the highway verge is historically significant noting its position next to a farm building. The said farm building has no historical significance and therefore fails to meet this element of Paragraph 102 of the NPPF (2021).
		2.45 Policy SPTN 10 therefore fails to meet Basic Condition a) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011) as it does not accord with the NPPF (2021).
		2.46 Notwithstanding this, land adjacent to the First Strokes swimming pool is allocated for development under emerging allocation LA013 in the Draft JLP. The emerging allocation recognises that there may be a need for highway improvements to deliver the emerging allocation.
		2.47 Noting that the aforementioned highway verge fails to meet the criteria set out within the NPPF (2021) paragraph 102, it would appear that the Pre-submission SNP proposal to designate a highway verge adjacent to the emerging allocation as a Local Green Space is seeking to prevent the LA013 from being delivered, therefore also conflicting with Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).
	Suffolk County Council	The provision of the designated Local Green Spaces in Policy SPTN10, and Open Space Sports and Recreation in Policy SPTN19, is welcomed. There are proven links ² between access to green outdoor spaces and the improvements to both physical and mental health and wellbeing for the population as a whole, including increasing the quality of life for the elderly, working age adults, and for children.
		² https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5663018/
		SCC welcomes the designation of Local Green Spaces in Policy SPTN10 and Map 8 and the Policies Map, as this supports the ongoing work to make Suffolk the Greenest County ³
		The Green Spaces Assessment on the Parish Council website justifies the designated Local Green Spaces based on the NPPF, which is welcome by SCC. There could have been greater evidence to demonstrate why the green spaces are important to the parish/ residents, in the 'demonstrably special to the local community and hold a particular local significance' sections of each of the tables.

Name	Organisation	Comment
		The selection of the final ten sites out of the qualifying 26 sites needs to be documented more clearly, to explain why sixteen of the
		sites were rejected as local green spaces despite meeting the criteria as set out in the NPPF.
		It is not clear why the size limitation imposed of the proposed spaces as 2.5ha. The OSS ⁴ gives the following guidance 'The areas woul normally be fairly self- contained with clearly-defined edges. Blanket designation of open countryside adjacent to settlements will not be appropriate.'
		³ <u>https://www.suffolk.gov.uk/planning-waste-and-environment/greenest-county</u>
	Babergh District Council	This policy lists ten Local Green Spaces (LGS), the locations for which are identified on Map 8 and on the Policies Maps. We make no comment on the policy itself but do make with a general comment about the quality of maps at the end of this table so refer you to that.
		We question the allocation of site # 10 (Green triangle at junction of Hadleigh Rd) based on the information set out in the Green Space Assessment. This states that the land has no ecological significance and that it is not demonstrably special to the local community. On that basis alone, it fails to meet the second criteria set out in NPPF para 102 and should be deleted. On a lesser point, is it just pure coincidence that this area has been identified as a LGS given the Wolsey Grange 2 application situation?
		As a closing paragraph we recommend you include: "Development in the Local Green Spaces will be consistent with national policy for Green Belts."
Response to	comments	
The c	comments are noted	
• The is	sland site will be add	ded to the Local Green Space list.
The c	other spaces put for	ward do not meet the Local Green Space criteria set by the NPPF.
• The e	evidence to support	the designation of the spaces is considered sufficient to meet the requirements of the NPPF.
Fram	ework is clear what	d plans that have stated what restrictions apply have been found, through legal challenge, not to conform with the NPPF. The development is appropriate on a Local Green Space, as stated in Para 8.17. n triangle on Hadleigh Road will be deleted.
Proposed ch	anges	
-		licy SPTN10 to delete reference to the green triangle on Hadleigh Road (LGS 10).
	44 D' !' '	
	11 – Biodiversity P	rotection and Enhancement
l Webb	-	But consideration to up keep of trees and hedgerows? Parish Council 1 tree £750 to maintain Hawthorn Hegde at No 17 CL (Church

Lane?) £300 one cut.

Name	Organisation	Comment
C Fuller	-	The list of (a) - (c) provides examples that are very small-scale. The aspiration should be elevated to ensure Sproughton delivers more because it has the potential & key assets. At a basic level, the objective should be to significantly conserve & enhance the existing resource through more ambitious objectives to help address biodiversity loss to meet government net gain/nature recovery objectives and contribute to quality of life/well-being & sustainable communities objectives. For example, this should be through the creation and safeguarding of new habitat for biodiversity, particularly to increase connectivity and extent of wildlife corridors and to conserve & enhance existing nature conservation sites.
S Catermole	-	In particular the planting of additional tree /hedgerows.
J Pateman- Gee		This policy, despite the should word, is good. I could offer that measuring a new net gain is very hard, not least as the baseline to measure from is different for every site. Also there is nothing stopping a developer from clearing a site of all ecology value prior to making an application. However, there is very little that can be done about this. The only thing I could suggest is a standard requirement for bee bricks, swift boxes etc for every house and this could go in the design requirements.
	Boyer on behalf of Taylor Wimpey UK Ltd	 2.48 We support both Policy SPTN 11 and SPTN 12 relating to biodiversity protection and enhancement and also recreational disturbance avoidance and mitigation, which aligns with the Draft JLP (specifically SP09). 2.49 Draft JLP allocation LA013 and application (DC/21/02671) provides a measurable net gain in biodiversity through the creation of new habitats, and will also be contributing to Recreational Disturbance Avoidance and Mitigation as well as providing circular walks, informal and formal areas of open space and dog walks. This is confirmed within the Environmental Statement (Chapter 8) and Shadow HRA that support the associated planning application (DC/21/02671).
	Suffolk Wildlife Trust	We are pleased to see that the Sproughton Neighbourhood Plan recognises the importance of biodiversity and proposes measures to protect and enhance it within Policy SPTN 11. As stated within the National Planning Policy Framework (NPPF) (2021), development should seek to provide biodiversity net gain, so it is encouraging that this is recognised within the Parish. A minimum requirement of 10% net gain in biodiversity; whilst not yet formally required by law, is contained within the recently passed Environment Act and this level is already being implemented as good practice across the country. Therefore, we recommend that the Sproughton Neighbourhood Plan should require developments to seek a minimum of 10% biodiversity net gain and this should be stated within Policy SPTN 11. Map 7 – Green Infrastructure Network, highlights ecological networks within the parish, however protection and enhancement of these specific ecological networks is not referenced within Policy SPTN 11. We recommend that the introductory sentence within Policy SPTN 11 is expanded to include the river and green corridors as highlighted in Map 7, to ensure that development does not impact these
		key ecological networks within the parish. Policy SPTN 11 should also reference safeguarding protected species, as well as Priority Habitats and Species as listed within The Natural Environment and Rural Communities (NERC) Act 2006 from future development. We recommend including key Priority Habitats and Species for Sproughton Parish within Policy SPTN 11 to ensure strengthened protection. For example, stag beetles and reptile species such as slow worm and grass snake are UK Priority Species with good populations within the parish. Other key species for the parish should be identified and specifically mentioned within the plan in order to provide better protection and require

Name	Organisation	Comment
		developers to provide targeted enhancements for key species and habitats. Sproughton parish also has a good resource of Ancient Woodland, therefore protection and enhancement of this Priority Habitat should be highlighted within the policy, as these irreplaceable habitats need buffering from development pressures in perpetuity.
	lpswich Borough Council	To highlight the necessity of achieving biodiversity net gain, it is suggested for presentation purposes that the requirement for biodiversity net gain be moved to the start of the policy and not the end.
		On the matter of biodiversity net gain, the "for example" criteria appear to read as more of a checklist, i.e. that if you provide one of these three suggestions the development will be supported. Obviously, there are a multitude of different means of achieving biodiversity net gain and they will vary drastically depending on the nature of the development, the site characteristics and its surroundings. Subsequently it is recommended that the three criteria are removed and instead used in the reasoned justification paragraphs as examples to provide applicants with potential ideas.
		It also needs to be specified what a "measurable net gain" in biodiversity is. It is assumed that this is 10% as per the Environment Bill but this needs to be clearly stated in the policy.
	Suffolk County Council	SCC welcomes Policy SPTN11 and the other mentions of biodiversity protection throughout the plan, particularly in the objectives and Policy SPTN17
		The following amendment is proposed to improve clarity for the reader to Policy SPTN11: <u>"Otherwise, acceptable</u> Development proposals will be supported where they provide a measurable net gain in biodiversity through, for example"
		The policy could also ask for the use of a standard biodiversity metric.

- The comments are noted
- National legislation on the protection and improvement of habitats has changed since the draft Plan consultation. The policy will be amended to reflect these changes.
- The introductory sentence will be amended to support proposals that enable the delivery of green infrastructure projects.
- Given that Priority Habitats and Species are already protected by legislation, it is not considered necessary to include specific references in the Neighbourhood Plan.

Proposed changes

• Amend Policy SPTN11 to bring it up-to-date concerning the introduction of the Environment Act.

Name	Organisation	Comment
Ameno	d the first sentence	e of Policy SPTN11 to refer to the delivery of green infrastructure projects.
	2 - Recreational I	Disturbance Avoidance and Mitigation
P Powell	-	I have already objected to the RAMS policy in relation to the JLP. Habitats Regulations Assessment/ NPPF/Gov guidance requirements for development in the zones of influence of designated habitat/wildlife sites set a hierarchy of measures that starts with impact avoidance and as its last resort considers mitigation payments. Natural England and NPPF clearly recommend Habitat Impact avoidance as the first consideration and this can be avoided by creation of SANG's (Suitable Alternative Natural Greenspace provision). This can preserve the best of an area for the recreational use of all the new residents of housing development and existing residents thereby diverting recreational users away from the Orwell Habitat sites. I have no Idea why this first recommended option doesn't even seam to have been considered in the JLP. But it should be at the top of our options for local development to ensure as much local green space as possible.
C Fuller	-	Needs to align with comments in this consultation response
J Pateman- Gee		Duplicate of the current provisions of the district council and duty of all decisions to consider by the LPA. Totally pointless if repeated in a NP.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.48 We support both Policy SPTN 11 and SPTN 12 relating to biodiversity protection and enhancement and also recreational disturbance avoidance and mitigation, which aligns with the Draft JLP (specifically SP09).
		2.49 Draft JLP allocation LA013 and application (DC/21/02671) provides a measurable net gain in biodiversity through the creation of new habitats, and will also be contributing to Recreational Disturbance Avoidance and Mitigation as well as providing circular walks, informal and formal areas of open space and dog walks. This is confirmed within the Environmental Statement (Chapter 8) and Shadow HRA that support the associated planning application (DC/21/02671).
	lpswich Borough Council	It would be beneficial in the reasoned justification of this policy to identify that the financial contribution towards mitigation measures to address the impact of new housing development on internationally designated sites is £121.89 per property based on the current RAMS strategy. This would provide applicants with certainty upfront about the required contribution.
		The policy should also make clear that additional mitigation beyond the financial contribution may be required for larger schemes as per the agreed RAMS strategy.
The pcThis ar	blicy is already agr blicy is yet to be in mendment sugges	reed across a number of districts and it is not appropriate to propose amendments to it in the Neighbourhood Plan. an adopted Local Plan for the area. Ited by IBC is not considered necessary given that the contribution may change during the lifetime of the Plan.
Proposed charNone	nges	

Name	Organisation	Comment
Chapter 8 Nat	ural Environment	: General Comments
V Durrant	If applicable	Paras 8.14 & 8.15 and map7 could be the place in the NP where the Green Infrastructure of the 'Island Site' could be detailed for protection and also included on Map 7. It could even be shown on Map 9 as a specific heading of 'Nature Reserve'. (Although mentioned in para 8.2, 'Biodiversity', I believe if should be included on one of the detailed maps to ensure its identity is highlighted and hopefully protected.
H Davies	-	The documentation of wildlife corridors in the parish is important so that any proposed development can be assessed against this.
R Hardacre	(Babergh District Council Councillor)	Good that Wildlife corridors gets a mention but a bit more detail would be good, e.g. ensuring link between Chantry Park and Gipping
P Powell	-	Note re Map 7: I have spoken with the architect of the Havens Gateway green Corridors and I would suggest that the potential Green Corridor Project shown is a little inaccurate, though is generally indicative. The intention was to show a greenway linking Chantry Vale up with Berlstead meadows to maintain a continuous green(ring) corridor around Ipswich within the developing area/A14. Therefor terminating at the bottom closer to the Copdock Roundabout where Bedstead Meadows wraps round the South end of the Pinewood development. However I understand this is now being interpreted by developers as a green route following the cycle path from the A14 underpass old route of London Road through to Chantry Park? The two flowers are projected green areas on the SEP (Chantry Cut Island) and a county park envisaged in Chantry Vale.
C Fuller	-	8.22 - Needs to adjust text 'In Sproughton parish appropriate development proposals that deliver such improvements will be encouraged' Delivering Sustainable developments and maintaining Sustainable Communities should not involve accepting impacts & compromises at the outset, it is about ensuring there are appropriate 'win/win/win' solutions for environmental/economic/social outcomes that delivers net environmental gain in step and in credit and a high quality of life & good well-being at the local level.
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No opinion
	Boyer on behalf of Taylor Wimpey UK Ltd	2.50 In addition to our concerns with regards to the valued landscape designation, we also raise concerns with regards to Map 7 of Chapter 8, which relates to "potential site based green infrastructure projects". In addition to our concerns with regards to the designation of a "potential site based green infrastructure project" on allocation LA013, Map 7 is unclear and is not considered to represent an effective tool in the decision making process.

Name	Organisation	Comment
		2.51 It is unclear what is meant by "green infrastructure projects". It is noted that Paragraph 8.16 of the Pre-submission SNP suggests that investigations into possible green infrastructure projects will begin after the Neighbourhood Plan has been drafted, which will seek to improve accessibility; enhance biodiversity; and provide health benefits.
		2.52 It is considered that insufficient information has been provided to demonstrate that the intention to designate an area of land on allocation LA013 to accommodate a green infrastructure project could have on the delivery of the allocation. We therefore raise concerns as to whether Map 7 – Green Infrastructure Network aligns with the Draft JLP (allowing for the full delivery of allocation LA013 to meet the Draft JLP housing numbers) and therefore accords with Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).
	lpswich Borough Council	Map 7 Green Infrastructure Network does not indicate the potential green corridor projects within Ipswich and suggests that it terminates at the edge of the Borough. It is recommended that Green Corridor Project I of the emerging Ipswich Local Plan is hatched onto Map 7 to demonstrate how the projects would link up. A copy of the Borough's Green Corridors map can be viewed here - https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/plan_6_green_corridors.pdf
		In addition to the above, the map itself feels too detached from its relevant Policy SPTN 21. It is recommended that either this map is moved to sit adjacent to Policy SPTN 21 or vice-versa. Map 7 'Potential site based green infrastructure projects' includes a sunflower symbol in the middle of the Sproughton Enterprise Park. It is presumed that this is with reference to the 'Island site' local nature reserve, and it is recommended that this be relocated to reflect this better.
	Suffolk County Council	Green Infrastructure The Household Survey (2020) indicates that 97% of the residents [or of those who replied] find Green Spaces in and around the parish important (paragraph 2.13).
		Map 7 Green Infrastructure illustrates areas for green corridors and GI projects. A brief summary on these within the narrative of the plan would be a useful addition to the plan.
		The Landscape Appraisal identifies four landscape corridors, which are referred to in paragraph 8.9; they are described as intact. These four corridors (The Grindle, The Gipping Valley Floor, Abbey Oaks and Sproughton Hall) could also be identified in the GI section and on Map 7. If they are the potential corridors shown (or part of these), it would be helpful to have them identified with a label, to get a more complete picture.
	Babergh	Page 31
	District Council	Amend the '(Source: *****)' description in the graph to read 'Household Survey'
		Para 8.4
		It might help to specifically direct readers to look at Figure 2 in the 'Landscape Appraisal (Feb 2021)' document.

Name	Organisation	Comment
		Para 8.9 In the last sentence, the cross reference should be to Map 4. Para 8.10 Typo. At end of the first paragraph, it should read 'designation:' {Nb: We include the colon given that what follows is a quote from the relevant AFA document.}
Parish Counc	il response	Para 8.13 Suggest fully justify so this occupies the whole page width (as per para 8.12)

- The comments are noted
- The various points raised by Babergh DC will be addressed
- Map 7 identifies the 'Island Site' as an initiative, The map will be amended to identify the intent of the site-based projects.
- Map 7 is a reproduction of the content of the Green Infrastructure Framework for Babergh (2012), which is referred to in paragraph 15.16 of the Submission Joint Local Plan (November 2020). It is not identifying new projects.
- The map is based on the content of the Babergh Green Infrastructure Framework and it is difficult, given the scale of the mapping in that document, to reflect them in any detail.
- Paragraph 8.15 will be amended to refer the reader to the Green Infrastructure Framework for more details.
- The Joint Local Plan refers to Green Infrastructure Projects.
- It is perhaps more that allocation LA013 does not align with the Green Infrastructure Framework for Babergh (2012), which is referred to in paragraph 15.16 of the Submission Joint Local Plan (November 2020). However, given the status of the Joint Local Plan in the light of the Inspectors' December 2021 letter to the District Council, the allocation will need to be reviewed with the preparation of the Part 2 Joint Local Plan.
- Paragraph 8.22 will be amended to take account of the passing of the Environment Act and to direct the reader to the .

Proposed changes

- Amend Map 7 to identify the intent of the site-based projects.
- Amend paragraph 8.22 to take account of the passing of the Environment Act.
- Make amendments and corrections as identified by Babergh DC.

Policy SPTN 13 – Heritage Assets		
P Wood	-	Although more awareness should be shared with people moving into the Parish
C Fuller	-	Needs to align with comments in this consultation response
J Pateman-		The only flaw in this application is point f.
Gee		

Name	Organisation	Comment
		Firstly, setting validation requirements for planning applications is not the role of a policy. This will likely be picked up in the examination if not removed.
		Second, this is essentially a copy of Para 198 of the current nppf, but the nppf says "should" and not "must". This is ironic as I have been saying to remove "should" and in fact this policy is stronger other policies in the NP in that regard. However, the risk due to the NPPF in this specific matter is that an inspector will take the nppf version, as the NP wording essentially conflicts by being a prescription requirement compared to the nppf version.
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No. Criteria a. of the policy states that proposals must preserve or enhance the significance of the heritage assets of the parish, their setting and the wider built environment. This is clearly not in accordance with national policy which allows harm to heritage assets in certain circumstances where it is outweighed by the benefits of proposed development (e.g. NPPF paragraph 202). This policy does not therefore meet the basic conditions of having regard to national policy.
	Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust	Draft policy SPTN13 (Heritage Assets) states that "all proposals must preserve or enhance the significance of the heritage assets of the parish; their setting and the wider built environment". The language used within the emerging SNP, as currently drafted, is inconsistent with the NPPF. Paragraph 202 of the NPPF states that where a development proposal will lead to "less than substantial harm" to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. As such, a proposal that results in harm to a designated heritage asset may be acceptable in some circumstances. By requiring all proposals to preserve or enhance the significance of the heritage assets of the parish, draft policy SPTN13 is inconsistent with the NPPF. We would suggest that the draft SNP policy is amended so that it is consistent with national planning policy.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.53 We object to Policy SPTN 13, particularly criterion b), which seeks retention of valued landscape areas. We have fundamental concerns with regards to this designation and associated criterion b) which would prevent development from coming forward on large swathes of allocation LA013, and directly conflict with the Draft JLP, thereby failing to meet Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).
		2.54 Moreover, the AECOM Design Guidance and Codes supporting document suggests that the majority of buildings within Sproughton are between 2 and 2.5 storeys. This fails to acknowledge the 3 storey dwellings that have been recently approved and considered acceptable on the development at Wolsey Grange 1. When developed, this will introduce 3 storey development to the Hadleigh Road Community area.
		2.55 The Draft JLP technical evidence base that supports allocation LA013 includes a Heritage Impact Assessment (HIA) prepared by LUC. It is acknowledged that parts of LA013 are sensitive in heritage and landscape terms. As set out in the HIA prepared by LUC, "detailed design and careful location of the development parcels could minimise this level of harm." This has been demonstrated

Name	Organisation	Comment
		through planning application (DC/21/02671), which seeks approval of a number of Parameter Plans that have been informed by landscape and
		heritage assessments, and restrict the development parcels to the least sensitive areas of the Site. This is an approach which has been discussed extensively with the Councils' appointed Heritage and Landscape Officers.
	Ipswich Borough Council	Policy SPTN 13 requires proposals to "preserve or enhance" heritage assets within the Parish. This wording could be strengthened to "preserve and enhance". Furthermore, there are a number of designated and non-designated heritage assets which sit outside the parish boundary. Due to the proximity of these sites to the parish boundary it is not unreasonable to consider that the setting of these heritage assets could be impacted by development taking place within Sproughton. The Policy should therefore be amended to afford protection to the setting of heritage assets beyond the Sproughton parish boundary for example the Listed Chantry Park which is also a Conservation Area.
	Babergh District Council	• Insert ' <u>designated</u> ' before 'heritage assets' in opening para' and in criterion a.
		• In criterion b., 'character or appearance of the parish' would be better than 'character or appearance within the parish'
		Regarding criterion f., the Council's Heritage Team have advised that it is not simply by submitting a heritage statement that harm would be justified and that it would be the content of the heritage statement that may or may not justify it.
		They also suggest: • " through the submission of a heritage statement" may be the wrong phrase to use here and this could be removed from the rest of the paragraph. Also, if the requirement of point f. is met, then the requirement to meet some of the other points would not be required. It may be necessary to update some of the wording to reflect this., and
		• that criterion f. should refer to 'clear and convincing justification' rather than just 'clear justification,' to match NPPF para 200.
		Such an approach would lead to wording that now differs from what has come forward of late by way of this policy criterion in other NPs and means that, in practice, it might read: 'provide clear and convincing justification for any works that would lead to harm to a heritage asset and yet be of wider substantial benefit.'

ish council response

- This policy has successfully been examined in other neighbourhood plans. It does not set validation requirements.
- The use of "must" is consistent with already made neighbourhood plans
- Policy LA013 of the emerging Joint Local Plan now has no status as the District Council has agreed with the Local Plan Inspectors that it and all other new • allocations should not be included in the current Joint Local Plan document. There is no requirement for the Neighbourhood Plan to allocate these sites.
- The majority of buildings are between 2 and 2.5 storeys. As such the statement does not need to recognise that there are three strorey dwellings or, indeed, bungalows.

• The Policy will be amended to preserve and enhance.

Name	Organisation	Comment
		amended as suggested by Babergh DC.
The pc	licy is clear in that	it sets out how the justification would be demonstrated, in the same way that Policy LP21 of the emerging Joint Local Plan does.
Proposed cha	200	
	-	to preserve and enhance.
		policy and criterion a. to insert "designated" before "heritage".
		ete "within" and replace with "of".
Amence	d criterion f. to inse	rt "and convincing" after clear.
Policy SPTN 1	4 – Buildings of L	ocal Significance
P Wood		See my comments re 19
C Fuller	-	Needs to align with comments in this consultation response
J Pateman-		Great. A development plan document, eg NP in this case, has to power to create a local list for non for non designated assets. So I
Gee		personally would list the buildings in the policy itself to ensure this is confirmed as the case and there is no argument.
G Armstrong	Armstrong Rigg	No.
	Planning on	
	behalf of	The policy states that "Proposals for any works that would lead to the loss of or substantial harm to a local heritage asset or a building
	Hopkins Homes	of local significance must be supported by an appropriate analysis of the significance of the asset to enable a balanced judgement to be made having regard to the scale of any harm or loss and the significance of the heritage asset."
		be made having regard to the scale of any harm of loss and the significance of the heritage asset.
		We object to this policy on the grounds that the accompanying document on Buildings of Local Significance designates almost every
		building on Lower Road with no assessment as to why the building is of local historical significance. If the Neighbourhood Plan is
		seeking to protect buildings that are not designated as listed buildings, then the burden of presenting evidence to demonstrate their
		significance falls on the Neighbourhood Plan and not future applicants for planning permission.
	Boyer on behalf	2.56 Policy SPTN 14 would appear to align with National and Local Policy as required, however it would be helpful if the local
	of Taylor	significance buildings are referenced in the Pre-submission SNP, by way of appendix or similar.
	Wimpey UK Ltd	
	Babergh	SPTN14 (and supporting documents)
	District Council	In the second paragraph, the word 'substantial' should be dropped.
		The Council's Heritage Team point out that per NDPE pare 104 all applications should contain a suitable beritage statement
		The Council's Heritage Team point out that, per NPPF para 194, all applications should contain a suitable heritage statement, regardless of the level of harm and that this applies to any heritage asset, meaning designated and non-designated. Similarly, they
		point out that NPPF para 203 refers to 'any harm,' and not just substantial harm.

Name	Organisation	Comment
		Given that this paragraph in policy SPTN14 is also identical to that of the second paragraph in the submitted Little Waldingfield NP (see policy LWD 12, pg 26), note should also be taken of commentary on this by the Examiner of that Plan (see text immediately preceding and first bullet on pg 26 of the Final Exam Report) and the same modification implemented. References: • <u>https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Little-Waldingfield-NP-Sub-Draft-Sept20.pdf</u> • <u>https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Little-Waldingfield-NP-Exam-Report.pdf</u>
The pointA separation	omments are noted blicy will be amenc arate assessment o	d. led to include the names of those properties being designated. f the buildings of local significance will be published. ents from Babergh DC will be incorporated as appropriate.
	d the policy to incl	ude the names of those properties being designated. nges proposed by Babergh DC.
Policy SPTN 1	5 – Sproughton F	Parish Special Character Area
H Davies		Where 'scale' is mentioned can we included (height, width & length)
J Webb	_	My Grandad and dad built it.
C Fuller	-	It would be more effective and holistic, if this plan and associated local plans sought to promote & enhance the environmental quality of all of this area through appropriate traffic management & pedestrian safety measures etc, aligned with comments in this consultation response. The value of this village hub area to the identity of this village should be harnassed as a foundation for enhancement (consistent with delivering quality of life, well-being & sustainable communities objectives) rather than eroded by focusing on short term quantitative targets that are regarded as non- sustainable development fro reasons set out within this consultation response
S Lavington	-	Map 10: Sproughton special character area (page 47). The shaded area on this map does not go far enough southwards along the B1113, thus missing out key areas of woodland (including TPO'd trees) and historically interesting buildings to the east and west of the road, including Monks Gate and Monks Wood, up to and including Rivers Farm cottages. The shaded area should be appropriately extended southwards before the Parish Council asks Babergh District Council to designate a Conservation Area.
M Levett	-	i have queried why Map 10 limits the North end of the Special Character Area to the mid point of Cardinal Field. I assume it is because there is a post and wire fence, arbitrarily fenced to separate grazing.

Name	Organisation	Comment
J Pateman- Gee		Not a conservation area yet, but trying to be. Not sure what an examiner is going to make of this approach, but have a go.
G Armstrong	Armstrong Rigg Planning on	No.
	behalf of Hopkins Homes	There is a set statutory process for designating conservation areas and it is important that this is followed. It is not appropriate for the Neighbourhood Plan to try and fast track this process.
		Paragraph 9.6 states that: "A separate "Special Character Area Appraisal" is being prepared to describe its special architectural and historic interest and within it, development proposals will need to demonstrate how they preserve and enhance the special characteristics of the area". It is clear from this that the Neighbourhood Plan has not even undertaken the necessary technical work to identify why (or indeed if) this area is of special character. The PPG is clear at ID: 41-072 that draft Neighbourhood Plans should be supported by sufficient and proportionate evidence. Until this evidence is produced, this policy cannot be said to meet the basic conditions as it fails to accord with national guidance.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.57 We have no comments to make with regards to Policy SPTN 15 and the Parish's Community Action 1.
	Ipswich Borough Council	As above Policy SPTN 15 requires proposals to "preserve or enhance" heritage assets within Sproughton. This wording could be strengthened to "preserve and enhance". Paragraphs 9.6 and 9.7 already refer to the need to "preserve and enhance" the Special Character Area, so there is currently a discrepancy between the supporting text and policy wording.
betweThe arThis is	ot considered that t en them. rea covered will be	the features referred to are appropriate for inclusion in the identified Special Character Area given the development that is located in extended north to include the whole of the Cardinal Field. does not pretend to be a conservation area but seeks that development proposals recognise the character of an area that, combined, distinct qualities.
Proposed cha • The ar	_	extended north to include the whole of the Cardinal Field.
Community	Action 1 – Conserv	vation Area
H Davies	-	Believe there is more than one area in the parish that should be conserved e.g. Red House Farm and Sproughton Manor & surrounding parkland
C Fuller	-	Needs to bet set within the context of SPTN15 and comments in this consultation response

Name	Organisation	Comment
		TPO'd trees) and historically interesting buildings to the east and west of the road, including Monks Gate and Monks Wood, up to and
		including Rivers Farm cottages. The shaded area should be appropriately extended southwards before the Parish Council asks Babergh
		District Council to designate a Conservation Area.
	Boyer on behalf	2.57 We have no comments to make with regards to Policy SPTN 15 and the Parish's Community Action 1.
	of Taylor	
	Wimpey UK Ltd	
Parish CounciIt is ur		eas would meet the Historic England definition for conservation areas.
Proposed cha • None		
-	toric Environment	- General Comments
P Wood	-	Again more awareness by the residents required
B Hunt	-	Sproughton heritage area as identified should remain untouched
V Scott Gray	-	Can't see specifically where the effects of additional traffic volume/access are required to be considered.
C Fuller	-	Needs to be set within the context of comments in this consultation response
M Levett		It is a critical feature for satellite villages not to suffer from any urban sprawl. Likewise for those villages it is important that there is no fused coalescence with adjoining villages. These points can be protected by consideration of, and including or extending a. guarantees that there will be no permitted development on the pasture land of the valley floor which areas of themselves have a real and threatened flood risk and provide essential wild life corridors. b. an extension of the area marked on page 47, map10, where there is a purple coloured area designated "Special Character Area" which in my view should extend further Northwards to fall in line with a point at Wayside Cottage (shown on page 62 Village Centre insert map) c. the assurance that the entire area known as Cardinal Field (allocated site LA116 (Map 3 red hatched area 2 para 6.2) is included in SPTN 15 to protect the setting of the Cluster of Heritage Assets (SPTN 13 & 14) and the important views from public vantage points (SPTN 9).
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No opinion.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.58 We have no further comments to make on Chapter 9.

Name	Organisation	Comment
	Suffolk County	Archaeology
	Council	Paragraph 9.4 gives a good indication on the long history of the parish whilst clearly stating SCC Archaeological Service should be consulted at an early stage with regards to below ground heritage, which is welcomed.
		It is suggested that the plan could note in this paragraph that the Historic Environment Record maintained by Suffolk County Council Archaeological Service contains further information about the history of the parish, found here: <u>https://heritage.suffolk.gov.uk/</u> .
		Following the link, people will be able to see the publicly accessible records within the Historic Environment Record of Suffolk and be able to see the HER records for Sproughton.
		Housing Allocations LA012 Land north of Burstall Lane, West of Loraine Way. This site has had first phase pre application archaeological evaluation which identified the presence of ring ditch and other archaeological features. The site requires a second phase of archaeological evaluation followed by mitigation by condition (application has been submitted already)
		LA013 Land North of A1071. This site has had first phase pre application archaeological evaluation. The site requires a second phase of archaeological evaluation followed by mitigation by condition
		LA014 Land at Poplar Lane. Archaeological fieldwork has been completed, SCCAS are currently waiting the post excavation work to be completed and for the report to be submitted for approval. This is covered by conditions.
		LA116 Land east of Loraine Way. This site has had an archaeological evaluation which identified the presence of a ring ditch and Saxon features. The site requires archaeological mitigation by archaeological excavation.
	Babergh District Council	Para 9.2 The third and fourth sentences should be combined to read as one. As separate sentences they do not make sense. Also, it should refer to 'special regard' not just 'regard,' to reflect s.16 and s.66 of the P(LBCA) Act 1990.
		Para 9.7 It is not clear what 'subservient to its setting' (second bullet point) would mean in practice. 'Subservience' can be used in relation the scale, design, function etc. of a building relative to another building, but we are not sure how you would compare, for example, the scale of a building with the scale of a 'setting'?

Name)	Organisation	Comment
			Can the Parish Council confirm which of the reference documents listed on this page
			http://sproughton.onesuffolk.net/neighbourhood-plan/reference-documents is the one referred to as 'K. Sproughton parish Special
			Character Area Appraisal' on their main consultation webpage.
Decne	nco to c	ommonte	

Response to comments

- The comments are noted.
- Paragraph 9.4 already refers to the Historic Environment Record.
- The sites referred to by the County Council are not allocated in the Neighbourhood Plan.
- Paragraph 9.2 is considered to be clear.
- It is considered that the second bullet point is clear.
- The Special Character Area Appraisal is complete and submitted with the Neighbourhood Plan.

Proposed changes

• None.

Policy SPTN	16 – Developmer	nt Design Considerations
V Durrant	If applicable	It is important for any new development to provide 'sufficient' off-road parking (drives or garages) to try and avoid what has happened on most new developments, that parking on roads/footways is accepted as the norm. This could result in delays to / the obstruction of public service vehicles from attending sites.
J Tuppen	-	Houses shouldn't be higher than 2 storeys and warehouses & business premises heights should be restricted to be in line with other nearby business premises. The height of the La Doria warehouse MUST not be used as a precedent as it is completely out of line with other warehouses in Suffolk and most of the UK.
C Fuller	-	Needs to be set within the context of comments in this consultation response
S Catermole	-	Broadly agree but must (F) enhance the safety of the highway network. Just maintaining is not enough where the existing highway network is not safe or robust enough. Wording to "enhance" and not include "maintain".
J Pateman- Gee		When a design policy is put together it tries to capture all, but the best ones break down what development they are aiming at. This policy doesn't break it down and so will have elements to work out if they apply or not, eg what applies if you are looking at a porch or hundreds of housing. Instead, this needs to to consider commercial, residential, industry, agricultural, household and also in the terms of outline, full and reserved matter applications.

Name	Organisation	Comment
		The appendix checklist are not requirements as the policy reports. Instead, it's a list of questions and so any answer will satisfy this policy (if you dont like the answer or not is not the point). Sadly in any event by putting "as appropriate" you have given the choice of even answering or not to the developer anyway, regardless of the fact you may not like the answer.
		So in this case we have the checklist to be demonstrated that doesn't need to be, but then we have additional elements that don't need to be demonstrated in the policy, but will be supported if they were proposed. However, nothing to say the proposed development will be not supported if none of this policy is complied with. This whole policy is undermined by the word "should" and similar words and means the whole thing is an option for developers. This needs urgent review!
		I have looked at the checklist and it's questions and it achieves very little, I have skipped to the following design requirements themselves in the actual policy:-
		a. recognise and address the key features, characteristics, landscape/building character, local distinctiveness,and special qualities of the area and/or building and, where necessary, prepare a landscape character appraisal to demonstrate this;
		While the policy doesn't require any notice to be taken of these matters, part a again provides no guidance for a landscape character appraisal. Where necessary is pointless unless you state where and when necessary. The rest is subjective judgement.
		b. do not involve the loss of gardens, important open, green, or landscaped areas, which make a significant contribution to the character and appearance of that part of the village;
		Sort of ok. Someone might argue that gardens are previously developed land and the best place for new development. However, the link is to its actual contribution to the village and so gardens that don't contribute would be fine. A very clever developer might realise that this only refers to the village and not the wider neighborhood plan area.
		c. taking mitigation measures into account, do not affect adversely: i. any historic character, architectural or archaeological heritage assets of the site and its surroundings, ii. important landscape characteristics including trees and ancient hedgerows and other prominent topographical features as set out in the
		landscape appraisal, iii. identified important views into, out of, or within the village as identified on the policies map, and iv. sites, habitats, species and features of ecological interest;
		Ok, these are generally the material considerations. Nothing wrong with listing them I suppose.
		d. do not locate sensitive development where its users and nearby residents would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented;

Name	Organisation	Comment
		Fails to say what is sensitive development and in what context. Also this is confusing as it talks about new development impact and then moves on to forms of pollution from existing. Good to have both, but split these apart and it will be stronger.
		e. produce designs that respect the character, scale, and density of the locality and, for new dwellings, ensuring garden sizes are proportionate to the character of the area;
		Good enough, but I would have added, "with a minimum of 79sqm of amenity excluding any parking". Something tangible!
		f. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that road layouts do not dominate the area, that all vehicle parking is provided within the plot and seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement;
		Goodbye parking courts forever! This is strong and might be very good if the beginning of this policy and the word "should" can change to ensure this is a requirement.
		g. where appropriate,incorporate sustainable drainage systems including, where feasible, rainwater and storm water harvesting and not result in water run-off that would add to or create surface water flooding;
		Where appropriatewho decides?
		In the end why not require rainwater recycling for all developmentand not just housing. Again get a minimum tangible gain for good design and climate change.
		h. where appropriate, make adequate provision for the covered storage of all wheelie bins and for cycle storage, including cycle charging points, in accordance with adopted cycle parking standards;
		Again where appropriate! Why not say required and let the exceptions come forward as needed.
		Ps - What are the adopted cycle standards? If the parish means SCC parking standards, these are not adopted by mid Suffolk.
		i. include suitable ducting capable of accepting fibre to enable superfast broadband; and
		Good
		j. provide one electric vehicle charging point per new off-street parking place created.

Name	Organisation	Comment
		Good. A few potential gains may come forward as part of this policy, more if strengthened, but what the following All public areas must include a minimum of 50% wildflower planting Compost bins for all dwellings Level access for less mobile for all buildings Bee brick, swift, owl and bat boxes Street lights to be motion active Nothing on illumination, adverts Tree lined streets (I know this one is in the NPPF now)
	Boyer on behalf of Taylor Wimpey UK Ltd	2.59 We do not object to the criteria in Policy SPTN 16, which appear to align with the principles set out within the NPPF.
	Ipswich Borough Council	Policy SPTN 16 requires development to reflect local characteristic in the Neighbourhood Plan area. It is noted that criteria h requires one electric vehicle charging point per new off-street parking space. Ipswich Borough Council supports efforts to encourage electric vehicle charging points in new developments to help address air quality concerns in the Borough. It is recommended though that Sproughton Parish Council engage with Suffolk County Council to ensure that this requirement is justified and feasible. This is because the requirement is beyond the standards set out in the Suffolk Guidance for Parking (2019) and it needs to be demonstrated that this can be achieved in new developments.
		Paragraph 6.17 (Housing Space Standards) of the Plan states that "Three storey homes are not permitted under the Neighbourhood Plan Design Code. Any development permitted shall be restricted to up to two storeys in height." The Borough considers that such a design requirement is unduly restrictive and the Parish Council may want to review this particular design requirement.
		The Design Guidance and Codes document appears to include design policies, rather than guidance. The document is very prescriptive and could be said to prohibit creativity and distinctiveness. The Parish Council may wish to review the wording and formatting of this document to avoid any confusion over its status accordingly. It is also unclear how this guidance sits within the context of the emerging draft Babergh and Mid Suffolk Joint Local Plan and any design guidance therein. None
	Suffolk County Council	The plan does indicate the concerns of unsafe parking in the parish. Therefore it is recommended that the neighbourhood plan should include a proportion of on-street parking to be included within new housing developments. On-street parking will always be inevitable from visitors and deliveries or maintenance. Having provisions that are well-designed and integrated into the development

Name	Organisation	Comment
		will help to ensure safety of pedestrians and road users, and help to minimise disruptions to access, including for emergency service and refuse collections vehicles. Please see pages 25-28 of Suffolk Guidance for Parking 2019 for further guidance.
		The following amendments are recommended for Policy SPTN16:
		" f. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that road layouts do not dominate the area, that all-appropriate vehicle parking is provided within the <i>development</i> plot where a proportion of parking is provided on street within a new development, but is well designed, located and integrated into the scheme to avoid obstruction to all highway users or impede visibility, and seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement whilst prioritising the movement of pedestrians and cyclists;"
		h. where appropriate, make adequate provision for the covered storage of all wheelie bins and for <i>secure</i> cycle storage, including cycle charging points, in accordance with adopted cycle parking standards;"
		SCC requests that reference should be made to Suffolk Guidance for Parking (2019) ⁶ with regard to parking, cycle storage, and electric vehicle charging.
	Babergh	Amend cross reference in first para to read 'Appendix 3'.
	District Council	• In criterion b., we have previously seen NP Examiners call for the word 'important' to be removed from before 'open, green, and landscaped areas' because, in their opinion, these areas have not been defined. You should consider whether the same applies here and, if it does, take appropriate action.
	ncil response	
	comments are noted	
plar • The	ning application. It is	sals will be supported where, as appropriate to the proposal, they:" which makes it quite clear that not all elements will apply to every s not possible and unreasonable for a policy to set out which elements will apply to every potential type of planning application. al consideration for planning officers dealing with an application to consider, as was demonstrated in a recent decision at Botesdale in
	•	ning vehicle charging points has already been successfully incorporated into made neighbourhood plans across Suffolk. es not contain policies.

- On-street parking has a significant detrimental impact on the character of the area as well as the ability to service a development and highway safety.
- The policy will be amended to make provision for secure cycle storage.
- The policy will be amended in response to the comments made by Babergh DC.

Proposed changes

- Amend the policy to make provision for secure cycle storage.
- Amend the first paragraph and criterion b. in accordance with Babergh DC comments.

Name	Organisation	Comment
	17 – Flooding and	Sustainable Drainage
P Wood	-	I think this is a crucial issue with global warming
J Tuppen Davies	-	Consideration needs to be given to developments upstream exacerbating flooding downstream in Sproughton.
C Fuller	-	Development should avoid building in the Gipping Valley floodplain. Needs to be set within the context of the comments within this consultation response
J Pateman- Gee		SuDs are a requirement for development of 10 dwellings or more and SCC Floods team will not look at anything under 10 units. However this policy is vague on when and what development types this policy applies to. All new development could mean a conservatory or a new warehouse. As the SCC flood team already deal with this area, the policy is vague and has lots of words like "should"it will be ignored. Also it sort of repeats point g of the design policy 16.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.60 We do not support Policy SPTN 17. Firstly, the need for Drainage Strategies and Flood Risk Assessments to support proposals, as well as the requirement to use SuDS are addressed through National and Local Policies. This Policy, as currently worded, is unnecessary as it repeats existing requirements.
		2.61 The Policy also states that all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site drainage and water resources will be managed. The Policy, however, fails to confirm what level of detail is appropriate for what scale of development and does not define the term "water resources". Further clarification is required.
		2.62 Whilst it is not disputed that multifunctional drainage systems have clear benefits, it is not considered that "wetland" is the appropriate term in reference to drainage strategies.
		2.63 In response to "rainwater and stormwater harvesting and recycling", it should be acknowledged that only large scale harvesting would usually provide an open basin.
		2.64 Drainage schemes and strategies are entirely man-made, the Pre-submission SNP's choice of phrase "natural drainage systems" is also not considered appropriate in the context of this Policy.
	Suffolk County Council	Flooding Firstly, there have been changes to the NPPF regarding flood risk and development. We have within Babergh and Mid Suffolk districts a number of allocated sites being re-evaluated due to the changes.
		Policy SPTN17 - Flooding and Sustainable Drainage

Name	Organisation	Comment
		The following amendments are proposed to the first part of this policy:
		"Proposals for all new development will be required to submit schemes appropriate to the scale of the proposal assess levels of flood
		risk (existing and future) and ensure they manage surface water from the proposal development, detailing how on-site drainage and
		water resources will be managed so as not to cause or exacerbate flooding elsewhere."
		The following amendments are proposed in order to strengthen paragraph 10.9:
		"All new development will be required where appropriate, to make provision for the management of surface water run-off in order not to exacerbate the situation increase the risk of flooding. The preferred method for this area is infiltration which reduces the flood
		threats from river floods and best matches the historical absorption of surface water by woodland and agriculture Whilst infiltration is
		preferable, this is subject to the site geology, and alternative methods to drain the development shall be in line with national drainage hierarchy. The attenuation and recycling of surface water and rainwater will be required through the incorporation of Sustainable
		Drainage Systems (SDS SuDS) that might include on-site rainwater and stormwater harvesting, greywater recycling and the
		management of run-off and water management in order to reduce the potential for making the situation
		worse."
	lpswich	Policy SPTN17 requires proposals to include use of above-ground open Sustainable Drainage Systems (SuDS) "as appropriate". This is
	Borough	a loose phrase which doesn't offer any certainty as to the circumstances where it is or is not appropriate to meet the policy
	Council	requirement. The Parish Council may wish to be more precise in their wording of this policy to avoid ambiguity. Reference should be made to the Suffolk County Council SuDS guidance and any guidance produced by Babergh and Mid Suffolk Councils in terms of
		Supplementary Planning Guidance and emerging Local Plan policy.
	cil response	
	comments are note	
	5	n cannot control developments outside the parish.
		are currently out of date as the JLP has yet to be adopted and therefore Policy SPTN17 reflects current local practice.
• The	first paragraph of tr	ne policy will be amended as suggested by the County Council.
Proposed cl	nanges	
• Ame	end the first paragra	ph of the policy will be amended as suggested by the County Council.
•		gn - General Comments
V Durrant	If applicable	This is a highly important chapter and the Development Design Checklist' should be robustly implemented.
B Hunt	-	Sproughton appears to have numerous under ground water runs and should be taken seriously to prevent flooding problems
P Powell	-	Note 10.9 seams to make distinction that infiltration is the preferred method for this area, But that Attenuation and recycling is SUDs.
		Both infiltration and attenuation are SUDs drainage systems, but Infiltration is the preferred method for this area.

Name	Organisation	Comment
S Catermole	-	In particular 10.6 in terms of height of rooflines. Wolsey Grange seems to have taller properties than originally agreed, unless i am
		mistaken.
C Fuller	-	Needs to bet set within the context of the comments within this consultation response
G Armstrong	Armstrong Rigg	No opinion
	Planning on	
	behalf of	
	Hopkins Homes	
	Boyer on behalf	2.65 We are concerned by Paragraph 10.9, which identifies infiltration as being the preferred method of drainage as it "reduces the
	of Taylor	flood threats from river floods and best matches the historical absorption of surface water woodland and agriculture". We suggest this
	Wimpey UK Ltd	phrase is removed from the SNP

- The comments are noted.
- The first paragraph of the policy will be amended as suggested by the County Council in their response to SPTN17.

Proposed changes

• Amend the first paragraph of the policy as suggested by the County Council in their response to SPTN17.

Policy SPTN ²	18 – Protecting Exi	sting Services and Facilities
C Fuller	-	Needs to be set within the context of the comments within this consultation response
J Pateman- Gee		Good, but only a and b or a and c need to be complied with to be satisfied. I will say b is going to be hard and may not be seen as reasonable.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.66 We have no comment to make in response to Policy SPTN 18 and note the Parish's commitment to undertaking play area improvements.
	lpswich Borough Council	Policy SPTN 18 seeks to safeguard "valued facilities or services" which support the local community, however the policy fails to define what is meant by the term "valued facilities or services". The Parish Council should consider identifying which facilities and services it aims to safeguard through this policy to prevent their unintended loss. Clause c states that the loss of existing community facilities and services will be supported where "alternative facilities and services are available, or replacement provision is made, of at least equivalent standard, in a location that is accessible to the community it serves with good access by public transport or by cycling or walking." In order to support sustainable travel choices, the Parish Council may wish to consider requiring alternative facilities to be accessible via public transport, cycling and walk, as opposed to one or other of these sustainable travel modes.
	Suffolk County Council	We fully support any measures to encourage sustainable travel.

Name	Organisation	Comment
	Babergh	Our only comment relates to criterion a. Policy LP31 in the emerging JLP refers to a sustained 6-month marketing period. We suggest
	District Council	amending the NP to follow suite.
Parish Council response		

- The comments are noted.
- It is not considered necessary to define what is meant by the term "valued facilities or services".
- The policy will be amended to require 6 months marketing.

Proposed changes

• Amend criterion a. to require 6 months marketing instead of 12 months.

Community	Action 2 – Playing	Field Improvements
C Fuller	-	Improvement should be within the existing location
	Boyer on behalf of Taylor Wimpey UK Ltd	improvements.
Parish Cound • The o		
Proposed ch • None	-	
Policy SPTN	19 – Open Space,	Sport and Recreation Facilities
V Durrant	If applicable	I would suggest the specific mention of the 'Island Site' here. This is owned by IBC who have indicated that this will become a protected 'Nature Reserve'. To include this as a specific site would protect this major wildlife site and important element of the 'wildlife corridors'. Not specifically detailing this site and its protection from development in the NP, could lead to its absorption within the 'British Sugar' development, and its subsequent disappearance over time.
J Webb	-	Must include sufficient car parking Church Hall.
C Fuller	-	Needs to be set in the context of the comments in this consultation response
J Pateman- Gee		This sort of two policies. The first is protection of existing provisions and that reads fine. The second is to gain new provision of open space and sport out of new development. You state "where necessary", but don't say
		what your criteria is for when it is necessary. Meaning planners will not know when to apply making this policy useless.

Name	Organisation	Comment
		Babergh has no criteria on open space and sport provision at the moment, so this is a chance to write one. I would suggest splitting this into two policies.
		The rest of this policy is sort of design elements to consider, but that could be picked up under the design policy anyway if that was developed a little further and so this can slimmed down. PS - Floodlights are important to address and perhaps operation times as well.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.67 We support both Policy SPTN 19 and SPTN 20, which appear to align with NPPF (2021) and the Draft JLP in terms of needing to provide open space on new developments.
	lpswich Borough Council	Policy SPTN 19 states that "Proposals for the provision, enhancement and/or expansion of amenity, sport or recreation open space or facilities will be permitted subject to compliance with other Policies in the Development Plan. Development which will result in the loss of existing amenity, sport or recreation open space or facilities will not be allowed unless". The use of the phrases 'will be permitted' and 'will be allowed' carry too much weight and imply pre-determination. The phrases could be replaced with the terms 'supported' or 'encouraged' to convey a positive approach.
		Policy SPTN 19 continues "Where necessary to the acceptability of the development, the local planning authority will require developers of new housing, office, retail and other commercial and mixed development to provide open space including play areas, formal sport/recreation areas, amenity areas and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate." It is unusual for development other than residential to provide public open space and other forms of open space other than boundary treatment and setting which is required to contribute to 10% increase in biodiversity. It is suggested that this is amended to reflect this.
		Finally, the Policy states that "Proposals which give rise to intrusive floodlighting will not be permitted'. It would helpful to define what is considered to be "intrusive floodlight" to enable the Policy to be applied correctly and consistently. In addition to having an impact on residential amenity, flood lighting can have a detrimental impact on local wildlife habitats. Schemes involving floodlighting and developments in sensitive areas, such as adjacent to sites of nature conservation importance, should employ a specialist lighting engineer accredited by the Institute of Lighting Engineers to ensure that artificial lighting causes minimal disturbance to occupiers and wildlife.
	Suffolk County Council	SCC would suggest the inclusion of the need to make green spaces and facilities accessible to residents with limited mobility (inclusion of benches and well-maintained paths etc), into Policy SPTN19. This could help to make an elderly population feel more included as part of the community and reduce isolation of vulnerable groups.
		This policy could include public cycle parking to encourage active travel. Reference could be made to Suffolk Guidance for Parking (2019) regarding parking.

Name	Organisation	Comment
	Babergh	A minor amendment to ensure consistency with other recently examined NPs. Insert the words 'current and future' before 'needs of
	District Council	users' in criterion b.

Parish Council response

- The comments are noted.
- The island site will be defined as a Local Green Space.
- The use of words such as "will be permitted" and "will be allowed" is standard practice for development plan policies, of which the Neighbourhood Plan will be part of when made.
- The consideration of what constitutes "intrusive floodlighting" would be determined through the consideration of a planning application.
- The policy will be amended to include "Facilities must be fully inclusive and cater to those of all equality, age, abilities and disabilities."
- Any development will need to conform with adopted standards and therefore it's not appropriate to refer to cycle parking standards specifically in this policy.
- The policy will be amended as suggested by Babergh DC.

Proposed changes

• Amend criterion b. as suggested by Babergh DC.

Policy SPTN 2	20 – Utilities and i	nfrastructure
P Wood	-	More consideration in this area is required
C Fuller	-	Needs text adjustment
		(c) proposals have been sited & designed to minimise the impacts on the rural character & environmental quality of Sproughton Needs to be set in the context of the comments in this consultation response
J Pateman- Gee		Pointless policy from a planning position as thanks to permitted development the vast majority of this type of development doesn't need permission. Even when it might need permission, criteria are very narrow to judge and often on a prior approval basis with default of deemed consent in a short timeframe.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.67 We support both Policy SPTN 19 and SPTN 20, which appear to align with NPPF (2021) and the Draft JLP in terms of needing to provide open space on new developments.
	Ipswich Borough Council	Policy SPTN 20 aims to ensure that such infrastructure is sensitively sited and designed. A number of forms of electronic communications development are permitted under the provisions of the GPDO and as such the policy may not be enforceable.
		Furthermore, the Policy states that "Where possible, new overhead power and telephone cables/masts should be placed underground. Alternatively, they must be camouflaged to blend in with the environment". The term 'where possible' is a loose phrase which doesn't offer any certainty as to the circumstances where it is or is not possible to meet the policy requirement. The Parish Council may wish to be more precise in their wording of this policy to avoid ambiguity.

Name	Organisation	Comment
	Babergh	The last paragraph requires some re-writing to avoid confusion. We suggest:
	District Council	"Where possible, new power and telephone cables should be placed underground. If this is not possible, masts must be camouflaged to blend in with their environment."
Parish Counci	l response	
The co	mments are noted	I.
The pr	oposed clarificatio	n suggested by Babergh DC will be made.
Proposed cha	nges	
•	•	s suggested by Babergh DC.
Chapter 11 In	frastructure, Serv	ices and Facilities - General Comments
J Tuppen	-	More consideration needs to be given to cumumlative traffic impact of the developments in Sproughton and surrounding parishes.
C Fuller	-	Needs to be set in the context of the comments in this consultation response
G Armstrong	Armstrong Rigg	No opinion
	Planning on	
	behalf of	
	Hopkins Homes	
	Boyer on behalf	2.68 We support the content of Chapter 11 and have no further comments to make.
	of Taylor	
	Wimpey UK Ltd	
Parish Counci		
• The co	omments are noted	
Proposed cha	naes	
None	2	
	1 – Public Rights	
H Mitchell	-	More attention needs to be taken to ensure the rights of way are kept clear
C Fuller	-	Needs to be set in the context of the comments in this consultation response
J Pateman-		So this is a public right of way and bridle path policy. Sounds great and I don't think anyone would say support of footways is not a
Gee		good idea. However, I think you have missed a trick. Why not get new development sites can only be supported if they ensure
		connection and improvement to existing footways to be sustainable. New development should contribute to existing footways to
		mitigate the burden of new people using them.

Name	Organisation	Comment
Dr Hoque	National Highways (former, Highways England)	 Highways and Movement Policy - SPTN 21 Public Rights of Way On highways and movement, there are few existing problems/issues which have been identified in paragraph between 12.1 to 12.6. From National Highways, there are already few identified schemes on A14 and A12 to improve major highway infrastructures and associated junction improvement schemes although they are within the RIS programme they are still subject to statutory procedures and the availability of funding and cannot necessarily be guaranteed to come forward. Any transport assessment will need to be undertaken in accordance with the requirements of DfT Circular 02/2013: And National Highways protocol "The Strategic Road Network
S Lavington	-	and the Delivery of Sustainable Development." 12.9: walking (page 59). Community Action 3: public rights of way. Two items should be added to the list of required new paths: (a). Formalising the customary footpath through Monks Wood between High Street and the playing field and Primary School. There is a need to obtain a permanent public right of way between Monks Close and the playing field, using a path through the wood that has been in regular use by Sproughton residents for many years – and to my knowledge certainly since 1986. The community benefit of this is self-evident, since it provides a convenient, safe and direct footway between the dwellings on High Street and the village sports facilities and the primary school. The alternative route via Lower Street and Church Lane is much longer and passes alongside traffic- filled highways giving off excessive polluting fumes, using footways (pavements) that are in some places dangerously narrow – for example in the vicinity of number 9 High Street – where accidents to pedestrian have happened in the past. (b). A new footpath and cycle path is needed southwards along the headland to the eastern side of the B1113, connecting the Sproughton built area with the Beagle roundabout and hence with the A1071. This path would allow pedestrians and cyclists to avoid the dangers of the faster and twistier sections of the B1113 with blind bends. This is especially important for children attending the One Suffolk sixth form college and those residents who at present walk to work daily along the B1113. Note that Sproughton Parish Council's Transport Panel carried out a study of the route of this path, including Land Registry data, some years ago when actively pursuing a plane to obtain a study of the route of this path, including Land Registry data, some years ago when actively pursuing a plane to obtain a study of the route of this path, including Land Registry data, some years ago when actively
	Boyer on behalf of Taylor Wimpey UK Ltd	 pursuing a plan to obtain a grant to implement this footpath. The application was not successful. 2.73 We support the principle of Policy SPTN 21 in that measures to improve and extend existing network of public rights of way should be supported. 2.74 We do not agree with the inclusion of criterion ii) which states that improved or extended rights of way should lead to development of new bridleways to support the local equestrian community. We support the local equestrian community but it needs to be recognised that it may not always be possible for rights of way to lead to bridleways as a result of constraints outside of an applicant's control, including location. 2.75 Notwithstanding this, Policy SPTN 21 also fails to acknowledge that Suffolk County Council have responsibility for the PROW network, yet recognition of this is not referenced in the Pre-submission SNP.

Name	Organisation	Comment
		2.76 We suggest that criterion ii) is reworded to state, "where possible, and in conjunction with Suffolk County Council, they lead to
		development of new bridleways to support the local
		equestrian community with the local and neighbouring parishes".
	lpswich Borough Council	Ipswich Borough Council supports Policy SPTN 21 which aims to improve and extend the existing network of public rights of way. Part of the Outline Consent for the development of the Sproughton Enterprise Park includes agreement to upgrade and widen 1.4km of public footpath to an all weather surface. There is also reference to enhancement of the cycleway by the river in the Neighbourhood
	Suffolk County Council	 plan. This is not designated cycleway but is in fact a public right of way footpath. The Borough Council is seeking to establish and extend its own publicly accessible green trail around the edge of the Borough as illustrated on Plan 6 of the emerging Ipswich Local Plan, in order to address the need within the Borough for access to Natural and Semi Natural Greenspace. The green trail will provide an ecological corridor (this links to paragraph 8.23 of 'Biodiversity' in the draft neighbourhood plan and the need to accommodate wildlife corridors and a recreational resource for people to use. Development at the edge of the built-up area will be required to provide links within the green trail as part of on-site open space provision. Ipswich Borough Council is keen to work with neighbouring local authorities and parish councils to address cross boundary green infrastructure provision and identify sites or routes later in the plan period. Policy SPTN 21 Public Rights of Way and Community Action 3 Public Rights of Way are both very welcome.
		However, whilst point iii regarding biodiversity benefits is generally supported, it should be caveated with not allowing planting schemes to adversely affect the use of the public right of way. It should be noted that close planting or overhanging vegetation can impinge on the use for a path where such planting prevents sunlight drying out paths after bad weather.
• The	cil comments comments are noted uiring all developme	
• The	footpath through M	onks Wood is permissive as it is locked by the Land agent once a year.
 Exist 	ing public footpaths	and Church Lane allow access to Suffolk One for those that wish to walk.
		e that proposals "should" lead to new bridleways. ted by the County Council is not considered necessary.
Proposed ch	nanges	
• Non	-	
Community	Action 3 – Public r	ights of way
V Durrant	If applicable	Presumably this should be action 3.

Name	Organisation	Comment
P Powell	-	This should be CA 3
C Fuller	-	Needs to be set in the context of the comments in this consultation response
D Taylor	-	but would add to point 2 enabling road avoidance as much as is practicable
C Taylor	-	Do you mean Community Action 3?
S Lavington	-	 12.9: walking (page 59). Community Action 3: public rights of way. Two items should be added to the list of required new paths: (a). Formalising the customary footpath through Monks Wood between High Street and the playing field and Primary School. There is a need to obtain a permanent public right of way between Monks Close and the playing field, using a path through the wood that has been in regular use by Sproughton residents for many years – and to my knowledge certainly since 1986. The community benefit of this is self-evident, since it provides a convenient, safe and direct footway between the dwellings on High Street and the village sports facilities and the primary school. The alternative route via Lower Street and Church Lane is much longer and passes alongside traffic-filled highways giving off excessive polluting fumes, using footways (pavements) that are in some places dangerously narrow – for example in the vicinity of number 9 High Street – where accidents to pedestrian have happened in the past. (b). A new footpath and cycle path is needed southwards along the headland to the eastern side of the B1113, connecting the Sproughton built area with the Beagle roundabout and hence with the A1071. This path would allow pedestrians and cyclists to avoid the dangers of the faster and twistier sections of the B1113 with blind bends. This is especially important for children attending the One Suffolk sixth form college and those residents who at present walk to work daily along the B1113. Note that Sproughton Parish Council's Transport Panel carried out a study of the route of this path, including Land Registry data, some years ago when actively pursuing a plan to obtain a grant to implement this footpath. The application was not successful.
	Boyer on behalf of Taylor Wimpey UK Ltd	Community Action 2 is noted
	Suffolk County Council	Policy SPTN 21 Public Rights of Way and Community Action 3 Public Rights of Way are both very welcome. However, whilst point iii regarding biodiversity benefits is generally supported, it should be caveated with not allowing planting schemes to adversely affect the use of the public right of way. It should be noted that close planting or overhanging vegetation can impinge on the use for a path where such planting prevents sunlight drying out paths after bad weather.
It is acPublicThe fo	mments are noted knowledged that tl rights of way gene otpath through Mo	he comments form referred to Community Action No 2 but that the title was correct.
Proposed cha • None		

Name	Organisation	Comment
Chapter 12 H	<u> </u>	ement - General Comments
V Durrant	If applicable	In para 12.5, continued pressure needs to be put on Highways England to improve or modify the 'Off Network Diversion Route' using the B1113, through the village. I would suggest that para 12.1 also highlights the lack of a safe footway from the village centre to link up with the footway at the 'Beagle'. One way of of reducing vehicle speeds through the village is the installation of one or more pedestrian/ pelican crossings in the High Street.
P Wood	-	This is crucial as the Parish has suffered terribly from highways decisions
C Fuller	-	Needs to be set in the context of the comments in this consultation response
		12.9 - The text underplays the reality of the current & long-running traffic problems on High street that have been well-defined over many years (eg Parish Plan etc) and consistently ignored by Highways authorities, local planing authorities, developers and other regulators/enforcers. The road and pavement design is not fit for current traffic volume & A14 HGV usage, accounting for necessary residential parking, pedestrian requirements and characterful residential properties. There is a clear and well-documented conflict between necessary pavement usage by pedestrian/residents (includes vulnerable residents & front door directly opens onto pavement) and commuting vehicles driving along the pavement. Records will also show the excessive number of road works in high street (eg, water pipes etc) which are at least in part due to the excessive weight & associated vibrations of vehicles (including A14 diverted HGV's) and pavement driving impacting on insufficiently protected sub-surface infrastructure.
D Taylor	-	12.9 First bullet point- also an extension to the footpath along High Street from Rivers Court to the Beagle second bullet point- also a crossing where the footpath changes sides further to the south on the B1113
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No opinion
S Lavington	-	 12.9: walking (page 59). Community Action 3: public rights of way. Two items should be added to the list of required new paths: (a). Formalising the customary footpath through Monks Wood between High Street and the playing field and Primary School. There is a need to obtain a permanent public right of way between Monks Close and the playing field, using a path through the wood that has been in regular use by Sproughton residents for many years – and to my knowledge certainly since 1986. The community benefit of this is self-evident, since it provides a convenient, safe and direct footway between the dwellings on High Street and the village sports facilities and the primary school. The alternative route via Lower Street and Church Lane is much longer and passes alongside traffic-filled highways giving off excessive polluting fumes, using footways (pavements) that are in some places dangerously narrow – for example in the vicinity of number 9 High Street – where accidents to pedestrian have happened in the past.

Name	Organisation	Comment
		(b). A new footpath and cycle path is needed southwards along the headland to the eastern side of the B1113, connecting the Sproughton built area with the Beagle roundabout and hence with the A1071. This path would allow pedestrians and cyclists to avoid the dangers of the faster and twistier sections of the B1113 with blind bends. This is especially important for children attending the One Suffolk sixth form college and those residents who at present walk to work daily along the B1113. Note that Sproughton Parish Council's Transport Panel carried out a study of the route of this path, including Land Registry data, some years ago when actively pursuing a plan to obtain a grant to implement this footpath. The application was not successful.
S Catermole	-	Broadly agree. High Street and Lower Street have significant issues regarding pedestrian safety. I would additionally must reference the footpath provision along Hadleigh Road which i do consider to be dangerous considering the type of commercial traffic that uses the and speeds along it.
	Boyer on behalf of Taylor Wimpey UK Ltd	2.69 Overall, we appreciate and endorse Objectives 20 – 24 set out in this Chapter. Whilst this is not a direct comparison with the planning application that has been submitted (DC/21/02671), nor LA013 draft allocation within the Draft JLP, there is a clear correlation and we can with certainty say that the allocation and application (DC/21/02671) will achieve these objectives.
		2.70 The mitigation proposed as part of both the Wolsey Grange 1 development which has been modified and that proposed as part of development at Land North of the A1071 (DC/21/02671) will promote measures to improve pedestrian and cycle access, alongside safety.
		2.71 This includes: making segregated provision through the development to allow linkage between the A14 underpass and Church Road to the 6th form college at Suffolk One; improving existing provision alongside the A1071 to access the Beagle Public House; provide improvement to the Beagle Roundabout with traffic signal control that will remove existing congestion; and provide facilities within Hadleigh Road or the development to improve access to Chantry Park.
		2.72 Many of these measures are included within the relevant Policies of the Draft JLP. They will complement the focus on Public Rights of Way which as set out below the proposed development at Land North of the A1071 is maintaining in their own right.
		2.78 As explained above, the Parish's aspirations for highways and transport improvements are noted and appreciated. It is also acknowledged that the Parish are seeking improved cycle ways and infrastructure and a safe crossing point or points on Hadleigh Road to provide links between Collinsons and Elton Park and Chantry Park. We do not object to Chapter 12 Highways and Movement.
	Suffolk County Council	We welcome the reference to the physical and mental health and wellbeing benefits that can be gained from access to pleasant outdoor areas, in paragraph 12.11
		Active Travel Active travel, such as walking and cycling, is important in order to improve physical health and reduce obesity levels, as well as can help to minimise levels of air pollution from motorised vehicles.

Name	Organisation	Comment
		SCC welcomes the desire for safe walking and cycling routes highlighted throughout the plan and particularly in Chapter 12. Safe routes for walking and cycling are important to ensure the safety of residents of all ages, especially those that are very young or very old, and have mobility issues or are frail.
		Public Rights of Way There could be reference to other strategies that support this Neighbourhood Plan. This includes Suffolk County Council's Green Access Strategy (2020-2030) ⁵ . This strategy sets out the council's commitment to enhance public rights of way, including new linkages and upgrading routes where there is a need. The strategy also seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working. There is a typo under 12.10 where reference to Map 11 should be to Map 12.
		SCC recommends that Chapter 12 should include a new highways and sustainable transport policy. Transport Modelling undertaken for the Ipswich, Babergh and Mid Suffolk and Suffolk Coastal Local plans, highlight potential severe impacts on the road network in and around Ipswich as a result of the cumulative growth in the local plans. The identified solution to address this impact while meeting the housing need set out in local plans is mode shift from private cars to other modes of transport, of both the new and existing population. Mode shift is key, but not travelling at all (home working and parcel consolidation etc.) trip internalisation (work, education and residential co-located) and trip shift (travelling outside the peak hours for discretionary trips and more flexible employment options) are all part of the overall demand reduction picture. SCC produced the Transport Mitigation Strategy for the Ipswich Strategic Planning Area ⁷ to outline how this mode shift can be achieved and further work is being undertaken to identify a program of works to deliver the strategy.
		Sproughton Neighbourhood Plan can contribute to the delivery of this strategy. Being an Ipswich Fringe location, it has some of the highest potential for mode shift than many other places within the Ipswich Strategic Planning Area, with the exception of Ipswich itself. The Neighbourhood Plan should support the delivery of the strategy through policy. Supporting the strategy would also help to achieve the Transport Objectives within the neighbourhood plan. Within this new policy, there should be the explicit support for the Ipswich Strategic Plan Area (ISPA) Transport Mitigation Strategy, which covers Babergh and Mid Suffolk Districts, Ipswich Borough, and part of East Suffolk Council (former Suffolk Coastal Area).
		This new policy should support sustainable transport measures set out in the Babergh and Mid Suffolk Infrastructure Delivery Plan (IDP), the emerging programme of works to deliver the Transport Mitigation Strategy and walking and cycling infrastructure plans.
		The IDP indicates the following mitigation schemes will be required for Sproughton: Mitigation measures identified under current applications in this area would be required: - Footways improvements in Sproughton - Zebra crossing in Sproughton - Junction improvements A1071 - Improved pedestrian links between Sproughton and Bramford Land to the west of Hadleigh Road (LA013) – Cycle links and pedestrian links will be required.

Name	Organisation	Comment
		The following wording is proposed for a new policy regarding sustainable transport:
		"Policy SPTN 22 – Highways and Sustainable Transport. Development proposals should seek to maximise sustainable modes of transport as a priority, ensuring that the site is connected to existing services and facilities, and is accessible via active travel such as walking and cycling, can access public transport Proposals must demonstrate contribution to the achievement of transport mode shift in the Transport Mitigation Strategy for the Ipswich Strategic Planning Area. Financial contributions or works in kind will be sought from development to assist with delivery of the Transport Mitigation Strategy for the Ipswich Strategic Planning Area, sustainable transport measures identified in the most up to date Infrastructure Delivery Plan and the most up to date walking and cycling infrastructure plans. Development should include
		Safe, connected, and inclusive walking and cycle routes
		Linkages to existing pedestrian and cycle networks and improvements to those routes if necessary
		• Public transport, such as new or revised services, and physical measures such as bus stops, improvements
		• Incentives to use sustainable modes of transport and encourage behaviour change, including through Travel Plans."
	Babergh District Council	Para 12.10 Should refer to Map 12
Parish Counci	l comments	
	omments are noted	
	rights of way gene	•
	•	onks Wood is permissive as it is locked by the Land agent once a year.
		ssary to refer to other strategies that support this Neighbourhood Plan including Suffolk County Council's Green Access Strategy.
		led to make reference to the correct map number.
	quire planning con	ary at such a local level to refer to the Ipswich Transport Strategy, especially as most works identified are within the highway and would
		content of the new policy proposed by the County Council is already sufficiently addressed in the Joint Local Plan and elsewhere in the
	bourhood Plan.	
Proposed cha		
-	-	to make reference to the correct map number.
	olicies Map Com	
H Davies	-	Inclusion of the important view from the hill north of Sproughton Road adjacent to the A14 junction close to Sproughton Manor

Name	Organisation	Comment
P Powell	-	The Parish Wide Policies Map includes all sites allocated in the JLP. However if an allocated site is rejected or reduced in the JLP
		examination process it will no longer need to be built on, but if it has been assigned in the SNP Policies Maps as settlement
		Boundaries it will invite further attempts to develop as it will conform to policies for land within the settlement boundary.
		LA116 is particularly relevant. Even if the JLP examination upholds the rejected appeal the SNP will have designated this as land within
		the settlement boundary and the community could be fighting of unacceptable planning applications (within the settlement boundary)
		on this site until a new SNP can be created to remove or amend it.
		Map should designate all settlement boundaries as 'subject to confirmation of settlement boundary in the emerging JLP'
C Fuller	-	Needs to be set in the context of the comments in this consultation response
S Catermole	-	Cannot as i do not have a Hadleigh road inset included in the version i have.
	Boyer on behalf	2.79 As set out in our response to previous questions, we do not support the Parish Wide Policies Map for the following reasons:
	of Taylor	• It excludes parts of allocation LA013 and therefore is contrary to Basic Condition e) required under Paragraph 8(1)(a)(2) of
	Wimpey UK Ltd	Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011);
		• It designates large swathes of allocation LA013 as valued landscape which should be protected from development and therefore
		seeks to prevent the delivery of allocation LA013, therefore failing to meet Basic Condition e) required under Paragraph 8(1)(a)(2)
		of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011);
		It proposes settlement gaps along Hadleigh Road which does not appear to be supported by appropriate evidence.
	Ipswich	It would be helpful if the resolution of the Policies Map could be sharper/ clearer to allow for sites to be examined in greater detail.
	Borough	Perhaps a separate document could be used instead to help with this.
	Council	
		Additionally, including designated and non-designated heritage assets on the map would be helpful to users of the document. It is
		also recommended that the Ipswich Green Trail is included on the Policy Map (see the Ipswich Local Plan Review Policies Map).
		Finally, the key is missing from the Village Centre Inset Map.
	Suffolk County	The Parish Wide Policies Map on page 61 says "See Hadleigh Road Inset Map" but is labelled as "Ipswich Fringe Policies Map" on page
	Council	63.
		There are areas of a grey colour on the policies maps, that do not appear to be identified in the key.
		It would also be helpful for the polices map to display the housing sites allocated in the JLP, to provide clarity and ease of reading.
Parish Counc	il comments	
• The c	omments are noted	L.
• The v	iew from close to S	proughton Manor is not from a publicly accessible point.
• As a r	esult of the outcom	ne of the Joint Local Plan examination the settlement Boundaries will be amended to reflect those in the adopted Babergh Local Plan
while	taking account of a	ubsequent development and unbuilt planning concents

while taking account of subsequent development and unbuilt planning consents.Policy LA013 is to be deleted from the JLP

Name	Organisation	Comment
• The V	alued Landscape ar	nd Important Gaps designations are supported by robust and professional assessments.
	5	ritage Assets will be identified but it is not appropriate to identify designations that are outside the Plan Area.
• The t	itle of the Inset Map) will be addressed.
Proposed ch	-	
		reflect the outcome of the Joint Local Plan examination.
	ify the non-designa ove the resolution o	ted heritage assets on the Policies Map.
• impro	ove the resolution o	
Village Contr	· Dalisias Mars Car	
	e Policies Map Co	
J Tuppen Davies	-	Should include Sproughton Manor and surrounding parkland as a special character area and note the view from the hill north of Sproughton Rd opp the Millenium Green adjacent to the A14 junction as per Alison Farmers Landscape Appraisal.
P Powell	-	However this does not include LA116 in the settlement boundary even though it has not been rejected yet by the JLP examination.
		Either the SNP has to conform to emerging JLP or it doesn't.
C Fuller	-	Needs to be set in the context of the comments in this consultation response
G Armstrong	Armstrong Rigg	No.
	Planning on	
	behalf of	As set out under questions 3, 13 and 21, the decisions to exclude Land east of Lorraine Way (JLP Policy LA116) from the settlement
	Hopkins Homes	boundary and to identify this site as both a Settlement Gap and part of a Special Character area render the draft Neighbourhood Plan
		contrary to the emerging Local Plan and to national policy and guidance. The draft Neighbourhood Plan therefore fails to meet the
		basic conditions.
	Boyer on behalf	2.80 We have no comment to make on the Village Centre Policies Map.
	of Taylor Wimpey UK Ltd	
	Babergh	On the Village Centre Inset Map on page 62, the colour combinations mean that the Local Green Space referred to as the 'Oak triangle
	District Council	by Manor Lodge' is not easily discernible.
Parish Cound	cil comments	
	omments are noted	
	•	cial character area into the area suggested would water down the strength of the designation, primarily made to recognise that built
	age assets if the area	
		ne of the Joint Local Plan examination the Settlement Boundaries will be amended to reflect those in the adopted Babergh Local Plan
while	taking account of s	subsequent development and unbuilt planning consents.

• Policy LA116 of the emerging Joint Local Plan now has no status as the District Council has agreed with the Local Plan Inspectors that it and all other new allocations should not be included in the current Joint Local Plan document. There is no requirement for the Neighbourhood Plan to allocate these sites.

Name	Organisation	Comment
• The c	olour resolution for	· Local Green Spaces will be addressed.
	_	irrent status of planning decisions and site allocations re colours
Ipswich Fring	ge Policies Map Co	omments
V Durrant	If applicable	See comments under question 35.
J Webb	-	Not if it impinges any further into Sproughton
P Powell	-	Following on from answer 36: If the SNP settlement boundaries dont have to conform to the JLP allocations. Then the WG2 application which hasn't yet been tested, and in particular those sections of WG2 that conflict with Heritage Impact Assessment guidance on similar levels as the grounds for the rejected appeal of LA116 (that land South of Church Lane and West of Hadleigh Road) should not be included in the SNP boundary for exactly the same reasons. That if it is included in the SNP Settlement Boundary it will be open to continued planning application attempts as a site within the settlement boundary until a new SNP can be drawn up, even if development of that part of the area is rejected by the JLP.
C Fuller	-	Needs to be set in the context of the comments in this consultation response
	Boyer on behalf of Taylor Wimpey UK Ltd	 2.81 As set out within our response to question 35, we do not support the Parish Wide Policies Map for the following reasons: It excludes parts of allocation LA013 and therefore is contrary to Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011), as allocation LA013 contributes to the overall housing numbers within the Draft JLP; It designates large swathes of allocation LA013 as valued landscape which should be protected from development and therefore seeks to prevent the delivery of allocation LA013, therefore failing to meet Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011); It proposes settlement gaps along Hadleigh Road which does not appear to be supported by appropriate evidence.
	Babergh District Council	For the map on page 63, should the title read 'Hadleigh Road Inset Map'? {Nb: The Contents Page entry will also need correcting.}

• The comments are noted.

- As a result of the outcome of the Joint Local Plan examination the settlement Boundaries will be amended to reflect those in the adopted Babergh Local Plan while taking account of subsequent development and unbuilt planning consents.
- Policy LA013 of the emerging Joint Local Plan now has no status as the District Council has agreed with the Local Plan Inspectors that it and all other new allocations should not be included in the current Joint Local Plan document. There is no requirement for the Neighbourhood Plan to allocate these sites.
- The Valued Landscape and Important Gaps designations are supported by robust and professional assessments.

Name	Organisation	Comment
The tit	le and Contents pa	age will be amended
Proposed cha	nges	
•	•	o on page 63 to Hadleigh Road Inset Map.
	•	irrent status of planning decisions and site allocations.
, and the		
C 1C		
General Comm		
V Durrant	If applicable	It is important that any agreed improvements under S106 Agreements for mitigating traffic flows, improving pedestrian safety or
		general infrastructure improvements are robust and that the responsible Authority enforces their implementation. We have been let
		down before with inter Authority disagreements on the SnOasis and associated Housing development. which has led to the current
V Ceett Creek		situation we have within the village where agreed traffic flow mitigations were not carried out. We Need the pavement extended on the High Street in Sproughton up to the Hadleigh Road roundabout.
V Scott Gray	-	We need a convivial pub in the village
		8
P Wood	-	Excellent and applaud the hard work invested
H Davies	_	The policies need to be as strong as possible to ensure that the village remains a village.
H Wood	_	More attention needs to be paid to the traffic and speeding problems both in the village and on the Hadleigh Road. New
		developments will just exacerbate this very real problem
H Mitchell	-	The traffic situation particularly where I liven the Hadleigh Road is increasing. Speeding is making it more and more dangerous and
		flagrant breaches of the overnight weight limit with no policing of this is just making it a very busy and dangerous road and this will
		only get worse with the new Taylor Wimpoery developments
S Marquess	-	Well done to all involved!
V Scott Gray	-	Congratulations on a well-prepared and balanced plan.
J Webb	-	Just a marvellous piece of hard work on our behalf. For which the whole village should be grateful for. Sadly it is just needs One
		politician to change an aspect of it and this document will stand for only some of it.
		Members of parliament should not have a say unless they actually visit and discuss with you all. House builders must be kept up to the
		rules and not allowed to do otherwise.
		Village will need a hedge and tree worker to maintain what is required.
R Hardacre	(Babergh	Good and comprehensive work!
	District Council	
	Councillor)	
P Powell	-	The team should be commended and supported in their efforts to produce such a complex and detailed piece of work.
		Resume of further points identified:
	1	

Name	Organisation	Comment
		SPTN 1,2 & 3
		These may need looking at in light of changes made to the JLP by BMSDC and Examination Inspectors comments.
		SPTN 12 & Chapter 8
		SNP should promote the preferred option of SANG's in relation to protection of the European Dedicated Habitat sites as that diverts
		footfall from those sites whilst providing better green spaces for our community. Map 7 doesn't accurately replicate the intended purpose of the proposed green (Ipswich ring) corridor
		I wap 7 doesn't accurately replicate the intended purpose of the proposed green (ipswich hing) condor
		Policy Maps
		There is an inconsistency in application of JLP policy to the Settlement Boundaries shown.
		LA116 which is still a proposed JLP site and now reduced to 40 homes by BMSDC from the 50 homes application rejected in the appeal
		is not included and therefore does not conform with the JLP. This was rejected in the appeal on Heritage Grounds which are duplicated
		in the JLP Heritage Impact Assessment.
		LA013 which is proposed in the JLP and for which an application has been submitted. This includes a significant parcel of land West of
		Church Lane, Red House and Hadleigh Rd. which is however rejected for development by the JLP's own Heritage Impact Assessment
		on similar grounds to LA116. However this is included in the SNP's defined Settlement Boundary. As these are similar issues not yet decided the SNP should either define the Settlement Boundary as provisional subject to JLP approval
		of allocated sites.
		Or if corrections to the SNP Settlement Boundary in consequence of final JLP allocation is allowed then both dealt with the same way.
		Either both provisionally excluded or both provisionally included
C Fuller	-	I can broadly support much of the content of many policies, but I believe the text and context should be adjusted as indicated within
		my consultation response. My consistent 'No' recognises that each policy does not sit in isolation but is set within the policy suite with
		reference to supporting text. Thus, I believe there needs to be adjustments to the vision and the policies /text that flows with a clear
		emphasis on ensuring sustainable development, sustainable communities, environmental net gain, high quality of life & good well
		being objectives are adequately met, as necessary within the relevant hierarchical structure of local plan & national policies.
		The only policy where I have supported with a 'yes' is for Q34 because at least the text in section 12 refers to the traffic problem and I
		want to ensure this matter is not overlooked and subsequently ignored, which would be consistent with my experience to date over
		the last fifteen years. I acknowledge addressing these issues may be complex but the plan needs to be ambitious & influence the
		outcomes for the benefit of current & future parish residents and this is a fundamental issue of quality of life & well-being.
		Additionally, the current environmental assets of sproughton should not be undervalued and the plan needs to more ambitiously
		promote enhancement & expansion of its green infrastructure as part of delivering environmental net gain & sustainable communities
		for the benefit of residents & visitors.

Name	Organisation	Comment
C Harris	-	Whilst I do support the policy SPTN8 for settlement gaps, it seems to me that the Map 5 does not adequately specify their extent. The
		Map 5 shows red lines and checkered lines, but I don't find their purpose defined in the text or identified in a key. There appears to be
		no constraint in the Wolsey Grange settlement extending west (beyond the A14).
D Taylor	-	The document has been very well researched, considered and expressed and I am very grateful for the extensive work done on it.
		My only slightly negative comment would be that at a glance, unless positioned with text about our problems, photos give the
		impression that they convey items that we approve or are proud of, whereas pictures like the 2 1/2 storey development at Wolsey
		Grange on page 49 (which is juxtaposed with text about good design) would be an example of design we would refuse. Maybe a
		picture of sensitive design (if there is one) would give a more aspirational impression?
C Taylor	-	Well done in producing a comprehensive & generally sensible plan
M Levett	-	 I have read the Draft Plan twice and i commend the skilful and thoughtful manner in which it has been drafted and presented. I have questions on :
		a. page 62 the Village Centre Insert map.
		b. Is this red line the existing Settlement Boundary of the village (ie. that it includes the dark olive green area adjacent to the allotments?)
		c. I understood the SPTN 8 Settlement Gap to be within this olive coloured area but it is not as far as i know the Village Settlement
		Boundary.
		2. It is a critical feature for satellite villages not to suffer from any urban sprawl. Likewise for those villages it is important that there is
		no fused coalescence with adjoining villages. These points can be protected by consideration of, and including or extending
		a. guarantees that there will be no permitted development on the pasture land of the valley floor which areas of themselves have a
		real and threatened flood risk and provide essential wild life corridors.
		b. an extension of the area marked on page 47, map10, where there is a purple coloured area designated "Special Character Area"
		which in my view should extend further Northwards to fall in line with a point at Wayside Cottage (shown on page 62 Village Centre insert map)
		c. the assurance that the entire area known as Cardinal Field (allocated site LA116 (Map 3 red hatched area 2 para 6.2) is included in
		SPTN 15 to protect the setting of the Cluster of Heritage Assets (SPTN 13 & 14) and the important views from public vantage points
		(SPTN 9).
S Catermole	-	Just a thank you to those involved in preparing the document.
		My main concerns mirror those negative aspects mentioned in 1.23: Traffic and footpaths being narrow. These are of concern in the
		high Street and Lower Street but also closer to me along the upper part of Hadleigh Road. Plans submitted for Wolsey Grange 2 do
		not take into account the narrow footway provision and traffic using this road.
J Pateman- Gee		Need policy on adverts and perhaps avoiding illumination of such in all the special areas designated in the NP.
		This NP is going to be there for 20 years and lot can happy to the NP area in that time. The High Street is a problem and this entire document fails to do anything about it.

Name	Organisation	Comment
		There is an opportunity for a bypass of sorts. Even if it is a one way circuit. Ransomes Close could still have green to the rear, but a small development and opportunity for road could save the village character See below.
		bbey Daks FB FB FB FB FB FB FB FB FB FB FB FB FB
	Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust	Thank you for consulting Pigeon Investment Management Ltd ('Pigeon') and the Felix-Thornley Cobbold Agricultural Trust ('the Trust') on the Regulation 14 Sproughton Neighbourhood Plan ('the SNP'). We very much welcome the opportunity to participate in the current Regulation 14 consultation. Pigeon is a privately owned company based in the Eastern Region, which specialises in high quality, landscape and design led sustainable development. As such, we support Neighbourhood Planning and the role that it can play in delivering a long-lasting positive contribution for local communities.
	Tust	The following comments are provided in the interests of ongoing and future collaborative working between Pigeon, the Trust and Sproughton Parish Council and Babergh District Council and are intended to assist with the ongoing preparation of the Sproughton Neighbourhood Plan.

Name	Organisation	Comment
		We trust that the above comments will assist with the ongoing preparation of the Sproughton Neighbourhood Plan and request that
		we are notified when the Parish Council submits the SNP to Babergh District Council, in due course.
		We also confirm that we are willing to have our contact details shared with Babergh Council for the purpose of enabling Babergh
		Council to keep us informed of further consultations on the SNP.
	Boyer on behalf	In the meantime, if it would be of assistance, we would be happy to meet with the Parish Council to discuss our comments. 1.1 These representations are submitted by Boyer on behalf of Taylor Wimpey UK Ltd. In response to the consultation on the
	of Taylor	Sproughton Neighbourhood Plan (SNP) Pre-Submission
	Wimpey UK Ltd	Consultation (October 2021) under Regulation 14 of the Neighbourhood Planning Regulations.
		1.2 These representations make specific reference to Land north of the A1071 ("the Site"), as illustrated at Appendix One, which is also identified as allocation LA013 in the emerging Babergh Mid Suffolk Draft Joint Local Plan ("the Draft JLP").
		1.3 In May 2021, Taylor Wimpey submitted an Outline planning application, with all matters reserved except for access, for the residential development of up to 750 dwellings, up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements on the Site (DC/21/02671).
		1.4 Prior to the Outline application submission, Taylor Wimpey have been promoting this Site for a number of years through the Draft JLP. Most recently, representations were submitted to the Regulation 19 consultation in December 2020, following which the Draft JLP was formally submitted to the Secretary of State for Housing, Communities and Local Government for independent Examination (Regulation 22) on 31st March 2021. Subsequent to this, Hearing Statements were also submitted in June 2021 in response to the Inspector's Issues, Matters and Questions and Taylor Wimpey have adopted an active role in participating in the Hearing sessions that have been undertaken to date.
		1.5 The pause to the Draft JLP examination does give uncertainty to its possible adoption timetable, and it is considered that the Pre- submission SNP timetable will need to be amended to ensure it aligns with the Draft JLP and conforms with the emerging strategic policies. This will ensure accordance with the Planning Practice Guidance (Paragraph: 009 Reference ID: 41-009-20190509) which states; "The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced".
		1.6 Taylor Wimpey support the production of the SNP and encourage local residents to undertake an active role in delivering new development in their local area.
		1.7 As set out within National Planning Practice Guidance (NPPG), Neighbourhood Plan policies should be clear and unambiguous (Paragraph: 041 Reference ID: 41-041-20140306). Moreover, National policy and guidance requires that Neighbourhood Plans are in general conformity with the adopted Local Plan in their area (Paragraph: 065 Reference ID: 41-065- 20140306). Whilst the current

Name	Organisation	Comment
		adopted Local Plan for Babergh is the Core Strategy 2014, Babergh is preparing a joint Local Plan with Mid Suffolk, which is currently undergoing Examination with an anticipated adoption date of 2022. It is therefore necessary for the preparation of this SNP to be in general conformity with the reasoning and evidence of the emerging Draft JLP to ensure that it is in general conformity with the Local Plan when it is made (Paragraph: 009 Reference ID: 41-009-20190509).
		1.8 The Neighbourhood Plan should support the delivery of strategic policies contained in the Draft JLP, and should guide and direct development that is outside of these strategic policies.
		1.9 When considered against the necessary Basic Conditions as required by Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011), it is our view that, as currently drafted, the Pre-submission SNP is not in conformity with the Draft JLP, therefore failing to meet Basic Condition e, which states "the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)".
		1.10 This is because the SNP includes policies that are likely to undermine the delivery of the minimum houses identified for Sproughton as set out in strategic policy SP04 of the Draft JLP.
		 1.11 The Basic Conditions relevant to the making of a neighbourhood plan are: Condition a: having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan; Condition d: the making of the neighbourhood plan contributes to the achievement of sustainable development; Condition e: the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area); Condition f: the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and Condition g: prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for neighbourhood plan.
		1.12 Section 2 of these representations provides our response to the Pre-submission SNP document, Section 3 provides our review of the relevant supporting documents to the Presubmission SNP, with details of the Site and proposed development sought through planning application (DC/21/02671) set out in Section 4.
		2.82 We remain concerned that, as currently drafted, the Pre-submission SNP is not in conformity with National Planning Policy or the Draft JLP and would not contribute to the achievement of sustainable development, and as such would fail to meet the necessary Basic Conditions as required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).

Name	Organisation	Comment
	Boyer on behalf	PRE-SUBMISSION SNP: SUPPORTING DOCUMENTS
	of Taylor	3.1 It is acknowledged that the Pre-submission SNP is supported by a number of supporting documents, some of which it is noted
	Wimpey UK Ltd	have been prepared by the SNP Sub-Committee.
		3.2 As outlined in response to the questions set out above, we have fundamental concerns with regards to the content of some of these documents, notably the supporting landscape documents, as discussed in greater detail below. As currently proposed, we consider that the Pre-submission SNP and supporting landscape documents seek to undermine the Draft JLP and its evidence base, particularly in respect of LA013.
		Landscape Appraisal (Alison Farmer Associates; February 2021)
		3.3 As a component of the Pre-submission SNP supporting documents, a Landscape Appraisal of the parish was produced by Alison Farmer Associates in February 2021. This appraisal aimed to provide robust evidence to support judgements on the sensitivity of land and its capacity to accommodate housing development from a landscape/settlement perspective. Four local assessment areas were identified within the appraisal with Local Area 4 encompassing Chantry Vale and Hermitage Farm. The area to the east of the A14 within Local Area 4 (Chantry Vale) has been predominantly allocated for development in the emerging local plan under Policy LA013.
		3.4 The Landscape Appraisal's assessment of Local Area 4 came to the following conclusion: The valley sides around The Red House have a high sensitivity (despite being east of the A14 and in close proximity to the existing urban edge of Ipswich) due to their intact rural character, setting to historic buildings at Red House, visual connectivity to the wider landscape to the west and high visibility. The proximity of this area of countryside, close to Ipswich is in easy reach of the local population and forms valued access to natural greenspace as well as a distinctive and high-quality approach to Ipswich. This landscape has little to no capacity for further development without loss of these qualities. Furthermore, farmland immediately surrounding Red House Farm is covenanted, restricting its use other than as agricultural land.
		3.5 This assessment appears to have led SPC to allocate significant proportions of Chantry Vale as valued landscape within their Pre- submission SNP, seeking to nullify the potential for residential development and comprehensive delivery of LA013.
		3.6 We object to the conclusions reached within the Landscape Appraisal and remain concerned that these fail to align with evidence published by BMSDC underpinning the Draft JLP evidence base, as well as the Environmental Statement produced by Boyer on behalf of Taylor Wimpey regarding site LA013, ultimately undermining the evidence base supporting the Draft JLP
		3.7 To support their Draft JLP, BMSDC published the Babergh and Mid Suffolk Landscape Sensitivity Assessment of SHELAA Sites. This document assessed each site identified within the SHELAA to determine impacts that development would have on the landscape. Within the report sites SS0191, SS0954, SS1024 were assessed in unison as they combine to form LA013. The assessment of these sites used similar criteria to that utilised within the Sproughton landscape appraisal, with the conclusion reached that:

Name	Organisation	Comment
		"These sites are assessed as having moderate sensitivity to residential development due to the undulating agricultural character, close proximity to heritage assets, and strong connection to Ipswich. The road network and lack of semi-natural features reduce sensitivity."
		3.8 The sites are adjudged to have moderate sensitivity to residential development, not high sensitivity as was claimed by the Landscape Appraisal supporting the Pre-submission SNP. The Landscape Appraisal supporting the Pre-submission SNP also claims that the site has little to no capacity for further development, which clearly does not align with the conclusion reached by BMSDC and supporting evidence to the Draft JLP. Indeed, the conclusions of SNP undermine and disregard the Draft JLP therefore failing to meet basic condition e) under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).
		3.9 BMSDC's Sustainability Appraisal assessed the sustainability issues and effects of emerging plans and policies, including Policy LA013. The table below is an extract from Table 7.21 of the Sustainability Appraisal showing a Summary of SA scores for place and allocations policies. Outlined in red are the scores given to Policy LA013 regarding landscape/townscape.
		Abcening Purpurg Runner Fungurg Purpurg Purpurg
		3.10 The three parcels were assessed as resulting in a minor negative harm to landscape/townscape. Similar to the BMSDC Landscape Sensitivity Assessment, this presents a very different conclusion to that drawn by the Landscape Appraisal submitted as supporting evidence to the Pre-submission SNP. Minor negative harm does not equate to the high sensitivity that SPC's commissioned Landscape Appraisal identified regarding the site.
		3.11 The Environmental Statement submitted in support of planning application DC/21/02671 and relating to allocation LA013 provided an assessment of the likely significant environmental effects of the project and helps to ensure that the importance of these effects, and the scope for reducing them, are properly understood by the public and the relevant authorities. Table 11.2 of the Statement provides a summary of the effects on the landscape in both the construction and operational phase. It was concluded that there will be a small number of negligible effects, however none of the effects are deemed to be major. The table also demonstrates

Name	Organisation	Comment
		that mitigation/enhancement measures will be applied to reduce residual effects where possible. This site specific and thorough Environmental Statement failed to identify any areas in which LA013 would be at high sensitivity to residential development.
		3.12 Given the fact that three reports (BMSDC's Sustainability Appraisal; BMSDC Landscape Sensitivity Assessment; and the Environment Statement submitted with application DC/21/02671), completed independent of each other, fail to reiterate the conclusions reached by the Landscape Appraisal commissioned by SPC, serious questions should be asked about the veracity of the Landscape Appraisal supporting document to the Presubmission SNP. SPC's desire to allocate large swathes of Chantry Vale as protected and valued landscape does not have sufficient or appropriate evidence to support it and is contradictory to all existing analysis of the site and ultimately, its assessment undermines the Draft JLP evidence base.
		4. LAND NORTH OF THE A1071, IPSWICH Introduction
		4.1 Taylor Wimpey are pleased to note that the Land North of the A1071 is identified as an allocation in the Pre-submission NDP, which aligns with the Draft JLP. That being said, and as set out in the preceding Sections, fundamental concerns are raised in response to the Parish's proposal to restrict large parts of the emerging allocation from being developed.
		4.2 The allocation is located on the edge of Ipswich, with approved and partially implemented developments to the north (referred to by Ipswich as the Eastern Gateway) and south (allocation LA014), with the urban edge of Ipswich to the east. The site is therefore in a logical location for accommodating development, and this is a position agreed by Officers at BMSDC through its allocation.
		4.3 Various forms of consultation and engagement has been undertaken in respect of the emerging allocation over a number of years. This has included various meetings with the Parish over this period. A workshop was also held with the Parish to discuss the evolution of the Proposed Development in May 2019 and a preview session held in advance of the Public Consultation Event in September 2019.
		4.4 Post-submission meetings have also been held with the Parish following the application submission in May 2021.
		Outline Planning Application 4.5 Following continued site promotion since 2014 and extensive engagement with statutory consultees and the Parish, in May 2021, Taylor Wimpey submitted an Outline planning application, with all matters reserved except for access, for the residential development of up to 750 dwellings, up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements on Land North of the A1071, identified as allocation LA013.
		4.6 The application (reference: DC/21/02671) is supported by all relevant technical supporting information.
L		

Name	Organisation	Comment
		4.7 The application is also supported by a number of Parameter Plans that have been informed by landscape and heritage assessments, and restrict the development parcels to the least sensitive areas of the Site. This is an approach which has been informed by extensive discussions with the Councils' appointed Heritage and Landscape Officers over a number of years.
		4.8 Taylor Wimpey are fully committed to delivering allocation LA013 which will make a positive contribution to the delivery of housing across Babergh and Mid Suffolk over the Neighbourhood and Local plan period.
	Avison Young on behalf of National Grid	National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Grid
		National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.
		National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. Proposed development sites crossed or in close proximity to National Grid assets:
		An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.
		National Grid has identified that it has no record of such assets within the Neighbourhood Plan area. National Grid provides information in relation to its assets at the website below. • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/
		Please also see attached information outlining guidance on development close to National Grid infrastructure [not included with this comments table but available on request from the Parish Council].
	Natural England	Thank you for your consultation on the above dated 2 October 2021. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Name	Organisation	Comment
		Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development
		plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals
		made.
		Natural England does not have any specific comments on this draft neighbourhood plan.
		However, we refer you to the attached annex [not included in this summary of comments but available from the Parish Council on
		request] which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.
	Water	The Parish Sproughton falls partially within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and
	Management	therefore the Board's Byelaws apply. A copy of the Board's Byelaws can be accessed on our website
	Alliance on	(https://www.wlma.org.uk/uploads/ESIDB_Byelaws.pdf), along with maps of the IDD
	behalf of East	(https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf). These maps also show which watercourses have been designated as
	Suffolk	'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of
	Drainage Board	arterial importance to the IDD and as such will normally receive maintenance from the IDB. These maps also show which watercourses
		have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board
		that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB. Mapping
		indictaing the watershed catchments of each Board are also available on our
		website:(https://www.wlma.org.uk/uploads/KLIDB_Watershed.pdf, https://www.wlma.org.uk/uploads/NRIDB_Watershed.pdf).
		For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning
		Practice Guidance SuDS discharge location hierarchy.
		In order to avoid conflict between the planning process and the Board's regulatory regimes and consenting processes where
		developments are proposed within or partially within a Board's IDD, please be aware of the following:
		• If a development proposes to dispose of surface water via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site
		material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent)
		to be undertaken to determine its efficiency. If (following testing) a strategy wholly reliant on infiltration is not viable and a
		surface water discharge is proposed to a watercourse, the proposed development will require consent in line with the Board's
		byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water
		Development Contribution fee, calculated in line with the Board's charging policy (available at
		https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).
		• If a development proposes to discharge surface water to a watercourse, the proposed development will require land drainage
		consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the
		payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy. (available at
		https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).

Name	Organisation	Comment
		 If a development proposes to discharge surface water to a sewer, I recommend that you satisfy yourselves that this proposal is in line with the drainage hierarchy (as per best practice) and is viable in this location. If a development proposes to discharge treated foul water to a watercourse, this proposal will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Should any development include works within 9 metres of a Board adopted watercourse, consent would be required to relax Byelaw 10 (no obstructions within 7 metres of the edge of drainage or flood risk management infrastructure). Should any development include works to alter a Board Adopted watercourse consent will be required under the Land Drainage Act 1991 (and byelaw 4). Should and works be proposed to alter a riparian watercourse, consent would be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4). Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such 1 strongly recommend that the required consent is sought prior to determination of the planning application. For developments outside a Board's IDD but within its watershed catchment, where surface water discharges have the potential to indirectly affect the Board's IDD, we would offer the following advice: If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced. As such we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent)
	Suffolk County Council	Thank you for consulting Suffolk County Council (SCC) on the Pre-Submission version of the Sproughton Neighbourhood Plan. SCC is not a plan making authority, except for minerals and waste. However, it is a fundamental part of the planning system being responsible for matters including: - Archaeology

Name	Organisation	Comment
		- Fire and Rescue
		- Flooding
		- Health and Wellbeing
		- Libraries
		- Minerals and Waste
		- Natural Environment
		 Public Rights of Way Transport
		This response, as with all those comments which SCC makes on emerging planning policies and allocations, will focus on matters
		relating to those services.
		Suffolk County Council is supportive of the vision for the Parish. In this letter we aim to highlight potential issues and opportunities in the plan and are happy to discuss anything that is raised.
		Where amendments to the plan are suggested added text will be in <i>italics</i> and deleted text will be in strikethrough.
		Education Early Years There are three early users active country in the Consustation and Discussed Words Ducy Deep (Inclusion Discussed), Jiscow Deep School
		There are three early years settings within the Sproughton and Pineward Ward; Busy Bees (Ipswich Pinewood), Jigsaw Pre-School, Oakland Hall Day Nursery Ltd
		As the Neighbourhood Plan is not suggesting any additional housing, it is unlikely to cause significant impact. The Joint Local Plan makes provision for new early years provision within site allocations as a result of the housing proposed.
		Primary Education
		The parish of Sproughton is served by more than one primary school catchment area. Much of the development proposed in Sproughton will be mitigated by the new primary school proposed within the Wolsey Grange development. A school site was originally requested within LA014 for 105 pupil places, but the current strategy is to fully provide the primary provision for both LA014 and LA013 within the school site offered within LA013, to provide a larger school of 420 pupil places (with the potential to expand to 630 places if required for future demand) and an onsite pre-school, which is more sustainable in the long term.
		In addition to the new primary school within the Wolsey Grange Development, future expansion of Sproughton Church of England Primary School from 105 to 140 places may be considered to meet demand where required.
		Secondary Education
		The parish of Sproughton is served by more than one secondary school catchment area. Much of the development proposed in Sproughton will be mitigated via expansion of Chantry Academy due to the proximity of the proposed developments to that school.

Name	Organisation	Comment				
		In regard to Claydon High School, our response to the local plan was as follows: The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. Contributions are expected to be sought to enable expansion. However, it is expected that demand from development and background population will mean that the level of expansion that is possible on the existing site may not be sufficient to mitigate this growth. The remainder of the additional demand will be met through out-of-catchment pupils from Ipswich being diverted back to Ipswich secondary schools in the longer term. Significant available capacity exists at Westbourne High School and the new Ipswich Garden Suburb secondary is planned to provide for the north and west of Ipswich. If needed, temporary places could be provided at schools in Ipswich, to manage short-term excess demand.				
			Status	Primary Catchment	Secondary Catchment	
		LA012 Land north of Burstall Lane West of Loraine Way, 10.6ha for x105 dwellings	Pending application DC/19/00567/HYB for 105 dwellings	Sproughton Church of England Primary	Claydon High School	
		LA013 Land North of A1071, 47.6ha for x800dw including 3ha land for preschool & primary school	Pending application DC/21/02671/OUT for 750 dwellings	Sprites Primary Academy / Sproughton Church of England Primary This development will be mitigated by the provision of a new primary school within this site.	Chantry Academy / Claydon High School This development will be mitigated via expansion of Chantry Academy	
		LA014 Land at Poplar Lane, 12ha for x475 dwellings, 4ha employment land & primary school	Approved application B/15/00993/OUT for 475 dwellings	Copdock Primary School / Sprites Primary Academy This development will be mitigated by the provision of a new primary school within site LA013	East Bergholt High School / Chantry Academy This development will be mitigated via expansion of Chantry Academy	
		LA116 Land east of Loraine Way, 3.4ha for x50 dwellings	Local plan allocation	Sproughton Church of England Primary	Claydon High School	
			Council is the Mi			nority for Suffolk. This means the County Council makes planning policy licy document is the Suffolk Minerals and Waste Local Plan, adopted in
		minerals and wa		e allocations ha	ve already been	rding the safeguarding of potential minerals resources and operating assessed through the local plan process. As the neighbourhood plan is sals in the plan.

Name Organisation	Comment
Babergh District Council	Comment General Maps Some maps are of a low-quality resolution, and therefore it is difficult to see any fine detail. I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. Some of these issues may be addressed by the SCC's Neighbourhood Planning Guidance, which contains information relating to County Council service areas and links to other potentially helpful resources. The guidance can be accessed here: Suffolk County Council Neighbourhood Planning Guidance. If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter. This response is made for an on behalf of Robert Hobbs, Corporate Manager for Strategic Planning. Thank you for consulting Babergh District Council on the Regulation 14 Pre-Submission Draft Sproughton Neighbourhood Plan. This letter and the attached table represents our formal response. The Plan is presented in a recognisable style with many of its policies borrowed from those tested through examination elsewhere. We have no objection that, but its important that their articulation here is relevant and that they add value at the local level. We do make specific comments on housing numbers, the Important Views, one of the Local Green Spaces, and on various heritage related matters. If you wish to continue a discussion on any of these after this consultation has ended, please do not hesitate to do so. You will also be aware that the public examination hearing sessions on the submitted Joint Local Plan (JLP) have been paused to allow this Council to undertake further work regarding the spatial distribution and hou

Name	Organisation	Comment
		Some re-organisation of both is needed to help understand what's what. In many cases, document titles and/or version dates do not match so it is unclear what might be draft and what might be the final document. There are also documents listed in Appendix 4 that do not appear to have a corresponding listing on the PC website, e.g., entry # 9. Sproughton parish list of significant buildings - December 2020. We will expect both to have been put right before this NP is formally submitted.
		Contents page Check and amend the page entry for the Errata. Should this be 71?
		Glossary
		Entry should read 'Historic Landscape'

Parish Council response

• Policy SPTN 12 will be amended as a result of the SEA / HRA Screening to require large residential developments (50 units or more) provide Suitable Alternative Natural Greenspace (SANG) on site or access to sufficient greenspace.

- The area covered by Policy SPTN15 will be extended as noted above under the comments for that policy.
- A policy on adverts is not considered necessary.
- Allocations in a development plan document have to demonstrate that they are deliverable. This would include a demonstration that the land is available and that the proposal is viable. The proposal west of High Street has not demonstrated these matters in support of the comment.
- It is not necessary for the Neighbourhood Plan to be delayed as a result of the delay in the JLP.
- It is considered that the SNP is in conformity with the strategic policies of the adopted and latest emerging local plans.
- The Inspectors examining the JLP have concluded that all new allocations in the JLP (including Policy SP04 and Policy LA013) should be deleted and that new appraisals of sites are undertaken.
- The Landscape Appraisal is a professionally prepared and detailed appraisal of what exists by a well-respected consultant.
- The Sensitivity Assessment is a higher-level assessment than the SNP Landscape Appraisal. The conclusion demonstrates that the landscape is sensitive to change.
- Substantive changes to the pre-submission draft plan are not to be made and therefore a further pre-submission consultation is not necessary.
- The corrections referred to by Babergh DC will be made.

Proposed changes to Plan

• Make corrections referred to by Babergh DC.

Appendix 6 - Schedule of Post Pre-Submission Consultation Modifications

The schedule identifies the main modifications to the Pre-Submission Neighbourhood Plan resulting from comments received during the pre-submission consultation. Other modifications have been made as a result of further work on the evidence documents and changes in circumstances and are not included in the schedule.

Deletions are struck through eg deletion Additions are underlined eg addition

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
Front Cover		Amend title to <u>SUBMISSION</u> DRAFT Amend date to month of submission	To bring the Plan up-to-date
Contents page		Amend to reflect changes elsewhere in the Plan	To bring the Plan up-to-date
Foreword		Amend second sentence of first paragraph as follows: It establishes a community-led vision for our village for the period to <u>2037</u> 2036 , and it will help to deliver the local community's housing needs and aspirations for the same period.	To correct error
5	1.6	Amend second sentence as follows The creation of the Neighbourhood Plan Sub-Committee (SNPSC) was agreed at the Parish Council meeting of 26 th February 2020. It was agreed that the NPSC would report into the planning committee.	In response to comments
5	1.8	Amend final sentence as follows: The Parish Council has approved it for public consultation. The draft Neighbourhood Plan was subject to "pre-submission" consultation for a period of six weeks in September 2021 and this version has been amended to reflect the comments received as well as to bring it up-to-date.	To bring the Plan up-to-date
7	1.12	Amend as follows:	In response to comments

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		The Plan has had regard to the originally agreed purpose and scope but, while being in line with the current adopted Babergh Local Plan Core Strategy, provides a framework for the period to <u>2037</u> 2036 .	
7	1.16	Amend as follows: The Neighbourhood Plan has to follow a number of required stages in its preparation, as illustrated below. We have now reached the Pre- Submission Draft stage, and, at the conclusion of this stage, <u>the Plan will be examined by an</u> <u>independent Neighbourhood Plan Examiner who will determine whether the Plan,</u> <u>as amended, should proceed to public referendum. all comments received will be</u> reviewed and the Plan will be amended where necessary prior to the parish council making a formal decision to submit it to Babergh District Council .	To bring the Plan up-to-date
7	Flowchart	Amend as follows: Remove red border from Autumn 2021 stage Amend third pink box as follows: Winter 2021/22 <u>Summer 2022</u> Place red border around third box Amend fourth pink box as follows: <u>Spring Autumn 2022</u> Amend fifth pink box as follows: <u>Summer Winter 2022/23</u>	To bring the Plan up-to-date
8	1.19	Amend final sentence as follows: The results and conclusions of this work, which is <u>are</u> published in separate documents, have informed the preparation of the planning policies in this Plan.	In response to comments

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		Amend second bullet point as follows: a landscape character appraisal that identified the important qualities and assets of the parish that need protecting	To correct error
9		Before "External Assessments insert:1.24The Draft Neighbourhood Plan was subject to "pre-submission"consultation in October and November 2021, when it was made available on theParish Council website. Three drop-in events were held at the Tithe Barn, whereprinted versions were able to be viewed and borrowed and information displayedabout the Plan and its content.	To bring the Plan up-to-date
10		After "External Assessments" insert <u>1.25</u> The content of the Neighbourhood Plan has been informed by evidence gathered during its preparation. These include the following documents which were prepared by consultants and funded by the Government Neighbourhood Plan support programme. They are available to view on the Parish Council website.	To provide clarity about the list of documents
11	2.11	Amend paragraph 2.11 as follows: The results of our 2020 Neighbourhood Plan Household Survey recorded that <u>14%</u> 15% of respondents live alone and <u>57%</u> 55% live in a household of only two people.	To correct errors
13	3.6	Amend as follows: In November 2020 the district council consulted on the final draft of the Joint Local Plan (the pre-submission draft). <u>The examination hearings took place during 2021</u> <u>and in December 2021 the Planning Inspectors, in agreement with the District</u> <u>Council, recommended that the Joint Local Plan should be modified, amongst other</u> <u>things, to exclude housing site allocations, the proposed "settlement boundaries"</u> <u>and the proposed distribution of housing growth across the district. Those matters</u> <u>would be addressed in a new Part 2 Joint Local Plan to be prepared at a later date.</u> <u>It is unlikely that the content of Part 1, which will identify the level of housing</u> <u>growth and contain policies for the day-to-day determination of planning</u> <u>applications, will be adopted until late 2022 or early 2023. At the time this</u> <u>Neighbourhood Pan was submitted to Babergh District Council the proposed</u> <u>modifications to the Joint Local Plan proposed by the Inspectors had yet be</u> <u>published.</u>	To bring the Plan up-to-date

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		At the time of preparing the Neighbourhood Plan, the Joint Local Plan is the subject of an independent examination by government planning inspectors. It is anticipated that the Joint Local Plan will be adopted in winter 2021/22, prior to the completion of the Neighbourhood Plan. Given the advanced stage of the Joint Local Plan and the anticipated timetable for the examination of the Neighbourhood Plan, significant regard has been given to the content of the Joint Local Plan while still having an appropriate regard to the strategic policies of the adopted Core Strategy and the Babergh Local Plan.	
13	3.7	Amend as follows: The emerging submitted Joint Local Plan (November 2020) identified identifies Sproughton as a Core Village within the "Ipswich Fringe". Ipswich Fringe parishes are those parishes that abut and surround Ipswich. Settlement boundaries are identified in the Neighbourhood Area covering: • the village • the employment areas on Sproughton Road and Wolsey Grange • existing developments that are part of the Hadleigh Road Community (Larchwood, Collinsons, Stella Maris, Nine Acres, Elton Park and Hadleigh Road) • future residential developments proposed and residential development under construction at Wolsey Grange <u>Given the decision to defer the designation of new Settlement Boundaries to Part 2</u> <u>of the Joint Local Plan, areas included within the Settlement Boundary of the</u> <u>submitted Joint Local Plan which did not have planning consent will now be</u> <u>removed from the Settlement Boundaries until site allocations are confirmed in Part</u> <u>2</u> .	To bring the Plan up-to-date
13	3.8	Amend as follows: 3.8 The emerging submission Joint Local Plan provides a clear strategy as to where development will take place in the period to 2037. It sets set a minimum housing requirement for Sproughton Neighbourhood Plan of 1,514 new homes between 2018 and 2037, of which 84 had planning permission but had yet to be completed as at 1 April 2018. <u>However, that housing requirement has no status given that new</u>	To bring the Plan up-to-date

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		site allocations are to be deferred to Part 2 of the Joint Local Plan and that the housing requirement figure was a direct result of the site allocations. Sites are allocated in the Joint Local Plan for 1,430 new homes across the parish, albeit that one of the sites was refused planning permission by the district council in 2020 and a subsequent appeal was dismissed by the Secretary of State. It remains to be seen whether this allocation, which is not supported in the Neighbourhood Plan, survives the examination of the Joint Local Plan.	
14	4.2	 Amend Objectives as follows: Housing Objectives 1 To maintain a strong community by ensuring an adequate supply and mix of housing types and the integration between different types and tenures of housing within the parish. 2 To enable local people to stay in or return to the village throughout their lifetime and as their needs change. 	In response to comments
		Business and Employment Objectives 3 To support small-scale business creation and retention <u>and</u> 4 To encourage the provision of services and infrastructure that enables business development. 5 <u>4</u> To ensure that the employment sector engages with the community with regard to business and employment developments. 6 To encourage providing opportunities for home working and local employment, particularly through having a fast, reliable fibre broadband network for all.	
		Natural Environment Objectives 7 <u>5</u> To minimise the impact of development on the best and most versatile agricultural land. 8 To protect and enhance biodiversity, through net gains in wildlife habitat and wildlife corridors. 9 <u>6</u> To maintain the village's rural landscape setting, the distinctive views and visual	

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		connectivity with the surrounding countryside from within the built-up area <u>,</u> protecting - 10 To protect the identity of the parish and prevent coalescence with Ipswich and	
		surrounding villages. <u>41</u> <u>7</u> To protect open green spaces, woodland, countryside, mature trees and ancient hedgerows <u>to enhance biodiversity, through net gains in wildlife habitat</u>	
		and wildlife corridors. Historic Environment Objectives	
		 12 8 To conserve and enhance the heritage assets and their settings. 13 9 To protect and improve the features which contribute to the historic character of the parish. 	
		Development Design 14 <u>10</u> To reduce the environmental impact of new buildings <u>and therefore</u> . 15 To ensure development complements and enhances the diverse character of the parish.	
		16 <u>11</u> To ensure new development is of a high-quality design, eco-friendly, 'fit for life' and of a scale (size/height) and type that reinforces local character.	
		Infrastructure, Services and Facilities 17 <u>12</u> To improve and sustain high quality local facilities for existing and future residents.	
		18 <u>13</u> To protect existing community, retail, education, and leisure facilities and support further growth where appropriate <u>including provision for facilities in</u> <u>association with new development</u> .	
		19 To ensure that sufficient community and leisure facilities are maintained to serve the needs of all sectors of the community including new complementary provision in association with new development.	
		Transport Objectives	

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		 20 14 To promote measures to improve the safety of the roads and footways through the parish by developing, linking and enhancing road, footway and cycle routes and to encourage sustainable travel modes, including public transport resulting in an interconnected set of routes through and around the whole of the parish. 21 To maintain, develop and enhance cycle routes through the parish. 22 15 To ensure that new development provides sufficient off-street parking. 23 16 To minimise the impact of future development within the parish on the existing local highway network. 24 To encourage sustainable travel modes, including public transport. 	
16	5.4	Amend second sentence of Para 5.4 as follows: All development sites will need to have particular regard to the potential for adverse <u>unacceptable</u> noise and air quality impacts on new development arising from the presence of the A14 and the capacity of the highways network to accommodate additional traffic resulting from the proposal.	In response to comments
17	6.1	Amend Para 6.1 as follows: 6.1 A primary role of the preparation of local plans and, to some extent, neighbourhood plans, is to identify the amount of new housing that will be required to meet the needs of Babergh including Ipswich Borough Council under the 'Duty to Cooperate' agreement the area and the location of that housing. <u>As</u> <u>noted above, the The</u> emerging Joint Local Plan (November 2020) identifies <u>identified</u> a requirement for at least 1,514 additional new homes in the parish between 1 April 2018 and 2037. This total comprises <u>included</u> planning permissions for 84 homes that had not been completed as of 1 April 2018 and sites that the Joint Local Plan allocates for development as illustrated in Table 1 and Map 3. However, the decision of the Planning Inspectors to require that those sites allocated in the Joint Local Plan that did not have planning permission to be removed from Part 1 of the Joint Local Plan means that there is no minimum housing requirement that the Neighbourhood Plan has to conform with. The Neighbourhood Plan does not, therefore, address the matter of how much or where new housing will be delivered during the period to 2037. This is a matter that the Joint Local Plan will address in due course.	To bring the Plan up-to-date

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
17	Table 1	Delete Table 1	To bring the Dian up to date
			To bring the Plan up-to-date
18	Map 3	Delete Map 3	To bring the Plan up-to-date
18	6.2	Delete paragraph 6.2 as the content is no longer relevant.	To bring the Plan up-to-date
19	6.10	Amend second sentence as follows: Early engagement has revealed that local residents are keen to ensure that housing development in the parish is sustainable with the construction of an appropriate level of infrastructure to mitigate the impact of the significant amount of development that has been may be allocated to the parish in the Joint Local Plan.	To bring the Plan up-to-date
20	SPTN2	Amend first sentence of Policy SPTN2 as follows: In all housing developments of ten or more homes, there should be an emphasis on providing a higher proportion of <u>at least 60% shall be</u> three-bedroomed homes within the scheme, unless it can be demonstrated that:	In response to comments
		Amend second sentence as follows: The provision of bungalows will also be supported where the proposal would not have a detrimental impact on the character of the area in the vicinity of the site.	In response to comments
		Amend criterion i as follows: i. iit is designed to be 'tenure blind' (so that it is indistinguishable from open market housing) either on site or, where schemes do not include open market housing, the wider area; and	Correct typographic error
21	6.14	Amend Para 6.14 as follows: The design of new homes can have a significant impact on the character of an area. The Local Plan already contains detailed policies for the consideration of the <u>Chapter 10 of the Neighbourhood Plan addresses how the</u> potential impact <u>of</u> <u>development</u> on the character of an area and the amenity of existing residents <u>will</u> <u>be considered</u> . Planning policies cannot influence the internal layout of dwellings but, given the higher proportion of older residents and their expressed desire to	

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		downsize to smaller dwellings within the parish, new homes will be particularly welcomed where they meet the accessible homes standards currently set out in Part M of the Building Regulations.	
21	6.16	Delete paragraph 6.16	The Lifetime Homes standard was withdrawn by the Government in 2015 and replaced with Part M4(2) of the Building Regulations and the Nationally Described Space Standards.
21	6.17	Amend first paragraph of Para 6.17 as follows: In March 2015, the Government introduced a 'Nationally Described Space Standard' for new homes. It set out to encourage enough space in homes to ensure that they can be used flexibly by a range of residents. The standards also aim to ensure that sufficient storage can be integrated into homes. It emphasised that these standards are intended to be a minimum standard. These standards <u>are required to be met in</u> <u>Policy LP26 of the Submission Joint Local Plan (November 2020) and require that:</u>	To clarify how the standards relate to the planning policy situation in the Neighbourhood Plan Area.
		Amend final paragraph of Para 6.17 as follows: Proposals for the 1 and 2 storey new homes that adhere to these standards will be supported. <u>The Neighbourhood Design Codes and the Landscape Appraisal do not</u> <u>support the construction of three storey dwellings Three storey homes are not</u> <u>permitted under the Neighbourhood Plan Design Code</u> . Any development permitted shall be restricted to up to two storeys in height. For the avoidance of doubt this does not permit two and a half storey buildings with accommodation in roof spaces.	To clarify the content of evidence that supports the Neighbourhood Plan.
24	Policy SPTN3	Amend first paragraph as follows: Proposals for the development of small-scale affordable housing schemes, including entry level homes for purchase (as defined by paragraph 78 <u>72</u> of the NPPF) on rural exception sites outside the Settlement Boundary, where housing	To correct error

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		would not normally be permitted by other policies, will be supported where there is a proven local need and provided that the housing:	
25	7.1	Amend first sentence as follows: Sproughton parish makes an important contribution to the economy of Babergh and <u>the Ipswich Strategic Planning Area (ISPA)</u> greater Ipswich, having an extensive employment area located between Junction 54 of the A14 and the main railway line and three other employment areas within the Wolsey Grange Masterplan Area.	In response to comments
27	7.3	Amend fourth sentence of Para 7.3 as follows: Home working is popular in the parish with <u>fifteen percent_15%</u> of those in employment working from home in 2011, a proportion that is likely to have increased 15% since that time <u>then and</u> , <u>perhaps</u> , <u>has accelerated even further as</u> <u>one of the longer-term impacts on work patterns caused by the Covid-19</u> <u>pandemic.</u>	In response to comments and to correct an error.
28	SPTN4	Amend criterion a) as follows: a) evidence can be provided that genuine attempts have been made to sell/let the site/premises in its current use by a period of sustained marketing for 6 months by an independent qualified assessor, and that it can be demonstrated that no suitable and viable alternative employment / business uses can be found or are likely to be found in the foreseeable future. The marketing must be undertaken at a realistic asking price, on a range of terms and in an appropriate format. The approach for the marketing campaign must be agreed by the local planning authority from the outset;	To ensure consistency with Policy LP13 of the emerging Joint Local Plan.
29	SPTN5	Amend first sentence of Policy SPTN5 as follows: Proposals for new business development will be supported where sites are located within the Settlement Boundaries identified on the Policies Map where they would not have an unacceptable impact on residential amenity, heritage assets and the highways network .	In response to comments

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
29	SPTN6	Amend Policy SPTN6 title to Farm Diversification and Equestrian Uses Delete first paragraph and replace with: <u>Applications for new employment uses of redundant traditional farm buildings and</u> <u>other rural buildings will be supported, providing it has been demonstrated that</u> <u>they are no longer viable or needed for farming. Re-use for economic development</u> <u>purposes is preferred, but proposals which would result in unacceptable harm to</u> <u>the rural economy or would adversely affect the character, highways, infrastructure,</u> <u>residential amenity, environment (including national and international designated</u> <u>sites) and landscape character as identified in the Neighbourhood Plan Landscape</u> <u>Appraisal will not be supported.</u>	In response to comments and to achieve consistency of policies with other examined Neighbourhood Plans.
31	Graph	Amend source in graph as follows: (Source: 2011 Census <u>Household Survey</u>)	To correct error
32	8.4	Amend first sentence of paragraph 8.4 as follows: The Landscape Appraisal's "Historic Landscape Characterisation" (Figure 2) shows that much of the enclosure pattern within the parish comprises pre-18th century enclosures which are relatively intact.	In response to comments
32	8.9	Amend sixth sentence of paragraph 8.9 as follows: The area is identified on Map 5 Map 3 and, while its designation does not preclude any development taking place in the area, it does mean that proposals will need to be designed to have regard to the special qualities of the area.	To correct error and reflect deletion of Map 3 from Pre- Submission Plan
32	8.10	Amend first sentence as follows: The independently published "Land at Red House Landscape Assessment" identifies that the Chantry Vale area satisfies the criteria to meet the "Valued Landscape" designation <u>as illustrated on Map 3.</u>	To correct spelling mistake and grammatical error and to provide reference to the map that illustrates the area.
34	8.11	Amend fourth sentence as follows: Development in the Settlement Gaps <u>, as illustrated on Map 4</u> between will not be supported unless it is in conformity with Policy SPTN 1 and there is no detrimental landscape impact and weakening of the gap.	For clarity

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
35	Map 5	Amend title as follows: Map 5 <u>Map 4</u> - Settlement Gaps	Consequential amendment
35	SPTN8	Amend first sentence of Policy SPTN8 as follows: The open and undeveloped nature of the Settlement Gaps, as identified on the Policies Map, will be protected from development to help prevent coalescence and retain the separate identity of the settlements.	In response to comments
36	8.12	Amend second and third sentences as follows: A separate appraisal of views has been undertaken as part of the Neighbourhood Plan Landscape <u>Appraisal</u> Character Assessment . The most important village views Important views from public from public places are identified on <u>Map 5.</u> Map 6 .	To correct error
36	Мар б	Amend Map 6 (to become Map 5 to ensure consistency with the separate Landscape Appraisal	In response to comments
37	8.13	Amend format of paragraph 8.13 to spread across two columns	In response to comments
37	SPTN9	Amend first sentence of Policy SPTN9 as follows: <u>Distinctive Important</u> views from public vantage points within or into the built-up areas and clusters, or out of built-up areas or clusters to the surrounding countryside, including those identified on Map 6 and the Policies Map, shall be maintained.	In response to comments
		Amend part ii as follows: ii. conserves and enhances the unique landscape and scenic beauty within the parish, having regard to the types of valued views identified and described in the Neighbourhood Plan Landscape Character Appraisal; and	To correct error
38	8.14	Amend last two sentences of paragraph as follows: Map 7 identifies the current green infrastructure across the parish. The policies in the Neighbourhood Plan seek to protect and enhance this network.	Factual correction as Para 8.15 correctly identifies the purpose of Map 7.

Page in Pre- Submission Consultation	Para No / Policy in Pre- Submission Consultation		
Plan	Plan	Modification	Reason
38	8.15	Amend last sentence as follows: The initiatives are identified on Map 7 below <u>and more details can be found in the</u> <u>Babergh Green Infrastructure Framework (2012).</u>	In response to comments
38	Мар 7	Amend Map 7 to label the two site based projects as Chantry Cut Island and Chantry Vale Country Park.	In response to comments
39	8.18	Amend first sentence of paragraph 8.18 as follows: Based on the NPPF criteria, the following areas in the parish are identified as Local Green Spaces, as illustrated on Map 8 and the Policies Map. Amend list in Para 8.18 as follows: 1. Millennium Green 2. Parish Square 3. Sproughton Court 4. Glebe Close 5. Gipping Way 6. <u>Gorse Field Close and Ladder Field, Church Lane</u> 7. Oak triangle by Manor Lodge <u>, Lower Street</u> 8. Allotments, Burstall Lane 9. <u>Ransome Close</u> 10. Church of All Saints – Cemetery / Churchyard 11. Monks Gate 12. Land adjoining The Shed, High Street/Lower Street 13. Chantry Cut Island 14. The Grove Wood. East of High Street 15. Oak Pit, Church Road	In response to comments and to reflect further work on assessing Local Green Spaces.
		9. Stella Maris 10. Green triangle at junction of Hadleigh Road with'First Strokes' swimming pool.	

Page in Pre- Submission Consultation	Para No / Policy in Pre- Submission Consultation		
Plan	Plan	Modification	Reason
40	SPTN10	Amend Policy SPTN10 as follows: 1. Millennium Green 2. Parish Square 3. Sproughton Court 4. Glebe Close 5. Gipping Way 6. <u>Gorse Field Close and Ladder Field, Church Lane</u> 7. Oak triangle by Manor Lodge <u>, Lower Street</u> 8. Allotments, Burstall Lane <u>9. Ransome Close</u> 10. Church of All Saints – Cemetery / Churchyard 11. Monks Gate 12. Land adjoining The Shed, High Street/Lower Street 13. Chantry Cut Island 14. The Grove Wood. East of High Street 15. Oak Pit, Church Road <u>9. Stella Maris</u> 10. Green triangle at junction of Hadleigh Road with'First Strokes' swimming pool. Development in the Local Green Spaces will be consistent with national policy for Green Belts.	In response to comments
42	8.22	Amend Para 8.22 as follows: <u>Currently the The NPPF_National Planning Practice Guidance notes that "The</u> <u>National Planning Policy Framework</u> encourages net gains for biodiversity to be sought through planning policies and decisions. Biodiversity net gain delivers <u>measurable improvements for biodiversity by creating or enhancing habitats in</u> <u>association with development. Biodiversity net gain and can be achieved on-site,</u> <u>off-site or through a combination of on-site and off-site measures</u> . <u>In November</u> <u>2021 the Environment Bill received Royal Assent. It introduced a statutory</u> <u>requirement for all appropriate developments to deliver a minimum 10 per cent</u> <u>measurable net gain in biodiversity. While the Environment Act 2021 sets out the</u>	

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		<u>core components (from the use of a metric, a system of national credits, a register</u> <u>of net gain and more), the details of how biodiversity net gain will work is, at the</u> <u>time of preparing this Plan, still in development ahead of the requirement</u> <u>becoming mandatory in the winter of 2023. Natural England have published a</u> <u>"Biodiversity Metric (3.0)" which is expected to be the standard measuring too to</u> <u>appraise how development will meet the requirements of the Act. Policy LP18 of</u> <u>the emerging Joint Local Plan (November 2020) requires development to "identify</u> <u>and pursue opportunities for securing measurable net gains, equivalent of a</u> <u>minimum 10% increase, for biodiversity" In Sproughton parish, Therefore,</u> <u>appropriate</u> development proposals that deliver such improvements <u>measurable</u> <u>net gains in line with the Environment Act core components and through the use of</u> <u>the Biodiversity Metric (3.0) or later adopted measurement tool</u> will be encouraged. <u>The Guidance states that e</u> Examples might include creating new habitats, enhancing existing habitats, providing green roofs, green walls and street trees. Relatively small features can often achieve important benefits for wildlife, such as incorporating swift bricks and bat boxes in developments and providing safe routes for hedgehogs between different areas of habitat.	
43	SPTN11	Amend first sentence as follows: Development proposals should avoid the loss of, or material harm to, trees, hedgerows and other natural features such as ponds. <u>Proposals that contribute to</u> <u>the delivery of the Green Infrastructure Projects will be supported.</u> Amend final paragraph of policy as follows: Otherwise acceptable-development proposals will be supported where they provide <u>a measurable net gain in biodiversity through, for example,</u> proposals <u>must achieve a minimum of 10% biodiversity measurable net gain over</u> <u>the pre-development biodiversity value as measured by the Natural England</u> <u>Biodiversity Metric (3.0) or later or agreed equivalent. Biodiversity improvement</u>	In response to comments In response to comments and to reflect the passing of the Environment Bill in November 2021.

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		 <u>should, where possible, form an integral part of the design of any proposal, for example through:</u> a) the creation of new natural habitats including ponds; b) the planting of additional trees and hedgerows (reflecting the character of Sproughton's traditional hedgerows), and; c) restoring and repairing fragmented biodiversity networks through, for example, including holes in fences which allow access for hedgehogs; and <u>d</u>) the incorporation of bee bricks and swift, owl and bat boxes into buildings. Where biodiversity assets cannot be retained or enhanced on site, 'biodiversity offsetting' to deliver a net gain off-site will be supported where the approach is in accordance with any relevant national or locally adopted protocols.	
		Contributions to off-site mitigation in respect to Policy SPTN 12 will be additional to the biodiversity net gain requirements of this policy.	
43	8.26	Amend paragraph 8.26 by adding the following to the end: <u>Given that the Stour & Orwell Estuary SPA and Ramsar site is within walking</u> <u>distance for residents of Sproughton on-site natural greenspace or access to</u> <u>sufficient greenspace must be provided for any residential development of more</u> <u>than 50 units in order to avoid adverse effects on integrity on the Stour & Orwell</u> <u>Estuaries SPA and Ramsar site from the development alone.</u>	To reflect the requirements of the Suffolk Coast RAMS relating to larger developments and in response to the Habitats Regulations Screening Opinion June 2022.
43	SPTN12	Amend policy as follows: Policy SPTN12 - Recreational Disturbance Avoidance and Mitigation Strategy All residential development within the Zones of Influence (ZOI) of European sites will be required to make a financial contribution towards mitigation measures, as detailed in the Suffolk Coast Recreational Disturbance disturbance Avoidance and	To reflect the requirements of the Suffolk Coast RAMS relating to larger developments and in response to the Habitats Regulations Screening Opinion June 2022.

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		Mitigation Strategy (RAMS), to avoid adverse in combination recreational disturbance effects and the integrity of the habitats of the European sites. Large residential developments (50 units or more) provide Suitable Alternative Natural Greenspace (SANG) on site or access to sufficient greenspace. All development should not have an adverse impact on the integrity of the Stour & Orwell Estuaries SPA and Ramsar site from the development alone.	
45	SPTN13	 Amend policy as follows: a. preserve or and enhance the significance of the <u>designated heritage</u> assets of the parish, their setting and the wider built environment; b. retain buildings and spaces, the loss of which would cause harm to the character or appearance within <u>of</u> the parish including: Areas of Distinctive Character Valued landscape areas f. provide clear <u>and convincing justification</u>, through the submission of a heritage statement, for any works that would lead to harm to a heritage asset and yet be of wider substantial benefit. 	In response to comments
46	SPTN14	Amend policy as follows: The retention and enhancement of local heritage assets the following buildings and features of local significance, as identified on the Policies Map and in Appendix 3, will be secured. including buildings, structures, features, archaeological sites and gardens of local interest must be appropriately secured. 1. Manor Lodge 2. Hall Field Cottage 3. Almshouses 4. Village Lock Up 5. Cage Cottage 6. 5 Lower Street 7. 3 Lower Street 8. 1 Lower Street 9. Peppermint House 10. Reading Room 11. Reading Room Cottage 12. Rectory Cottage	In response to comments

Page in Pre- Submission Consultation	Para No / Policy in Pre- Submission Consultation			
Plan	Plan	Modification 13. Church Hall	14 The Old Delige Llaves	Reason
		15. The Shed	14. The Old Police House 16. The Old Coach House	
		17. Old Stables	18. Chantry Row	
		19. Sproughton House (The Rookery)	20. Rivers Court	
		21. Abbey Oaks Gate House and Abbey Oaks	22. The Old Lodge	
		24. Laundry House	25. Old School House	
		26. Valley View	27. Park View	
		28. 1 Lower Chantry Cottage	29. Springvale Cottages	
		<u>30. Chantry Gate</u>	31. Cherry Holme	
		32. Balitore	33. Pinetrees	
		34. Beech Lawn	35. Elton Park Cottage	
		36. Hazeldell	37. Manderley Manor	
		38. Sproughton Park (Villa farm)	39. Pillbox	
		Proposals for any works that would cause harm to building <u>or feature</u> of local significance must be s analysis of the significance of the asset to enable having regard to the scale of any harm or loss an asset.	supported by an appropriate a balanced judgment to be made	Remove as per BDC suggestion
		The Buildings of Local Significance in Sproughtor identifies these buildings.	Parish and Village document	
47	Map 10	Replace with new map showing extended Special	Character Area	

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		 Addiginal area to be included Addiginal ar	
51	SPTN16	 Amend policy as follows: Proposals for new development must reflect the local characteristics in the Neighbourhood Plan area and create and contribute to a high quality, safe and sustainable environment. Planning applications should, as appropriate to the proposal, demonstrate how they satisfy the requirements of the Development Design Checklist in Appendix 2 3 of this Plan. 	Correct typographic error

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		In addition, proposals will be supported where, as appropriate to the proposal, they: a. recognise and address the key features, characteristics, landscape/building character, local distinctiveness, and special qualities of the area and/or building and, where necessary, prepare a landscape character appraisal to demonstrate this; b. do not involve the loss of gardens , important open, green, or landscaped areas, which make a significant contribution to the character and appearance of that part of the village <u>including areas identified in the Neighbourhood Plan</u> <u>Landscape Appraisal</u> ; c. taking mitigation measures into account, do not affect adversely: i. any historic character, architectural or archaeological heritage assets of the site and its surroundings, ii. important landscape characteristics including trees and ancient hedgerows and other prominent topographical features as set out in the Landscape Appraisal, iii. identified important views into, out of, or within the village as identified on the Policies Map, and	In response to comments
		 iv. sites, habitats, species and features of ecological interest; d. include tree-lined streets unless in specific cases there are clear, justifiable and compelling reasons why this would be inappropriate and include trees elsewhere within developments where the opportunity arises. de. do not locate sensitive development where its users and nearby residents would be significantly and adversely affected by noise, smell, vibration, lighting (including illuminated signs) or other forms of pollution from existing sources, 	In response to comments
		 unless adequate and appropriate mitigation can be implemented; ef. produce designs that respect the character, scale, and density of the locality and, for new dwellings, ensuring garden sizes are proportionate to the character of the area; fg. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that road layouts do not dominate the area, that all vehicle parking is provided within the plot and seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement; 	In response to comments

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		 <u>gh</u>. where appropriate, incorporate sustainable drainage systems including, where feasible, rainwater and storm water harvesting and not result in water run-off that would add to or create surface water flooding; <u>h.i</u> where appropriate, make adequate provision for the covered storage of all wheelie bins and for <u>secure</u> cycle storage, including cycle charging points, in accordance with adopted cycle parking standards; <u>ij</u>. include suitable ducting capable of accepting fibre to enable superfast broadband; and <u>jk</u>. provide one electric vehicle charging point per new off-street parking place created. 	In response to comments
52	SPTN17	Amend Policy SPTN17 as follows: POLICY SPTN 17 - FLOODING AND SUSTAINABLE DRAINAGE Proposals for all new development will be required to submit schemes appropriate to the scale of the proposal assess levels of flood risk (existing and future) and ensure they manage surface water from the proposal development, having regard to the Suffolk County Council SuDS guidance and any guidance produced by Babergh District Council in terms of Supplementary Planning Guidance detailing how on-site drainage and water resources will be managed so as not to cause or exacerbate surface water and fluvial flooding elsewhere. Proposals should, as appropriate, include the use of above-ground open Sustainable Drainage Systems (SuDS). These could include: • wetland and other water features, which can help reduce flood risk whilst offering other benefits including water quality, amenity/recreational areas, and biodiversity benefits; and • rainwater and stormwater harvesting and recycling; and • other natural drainage systems where easily accessible maintenance can be achieved	In response to comments

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
54	SPTN18	Amend Policy SPTN18 as follows: POLICY SPTN 18 - PROTECTING EXISTING SERVICES AND FACILITIES Proposals that would result in the loss of valued existing facilities or services which support a local community (or premises last used for such purposes) including sports facilities, will only be supported where: a. it can be demonstrated that the current use is not economically viable nor likely to become viable. Where appropriate, supporting financial evidence should be provided including any efforts to advertise the premises for sale for a minimum of 42 <u>6</u> months; and b. it can be demonstrated, through evidenced research, that there is no local demand for the use and that the building/site is not needed for any alternative social, community or leisure use; or c. alternative facilities and services are available, or replacement provision is made, of at least equivalent standard, in a location that is accessible to the community it serves with good access by public transport or by cycling or walking.	In response to comments
55	SPTN19	POLICY SPTN 19 - OPEN SPACE, SPORT AND RECREATION FACILITIES Proposals for the provision, enhancement and/or expansion of amenity, sport or recreation open space or facilities will be permitted subject to compliance with other Policies in the Development Plan. Development which will result in the loss of existing amenity, sport or recreation open space or facilities will not be allowed unless: a. it can be demonstrated that the space or facility is surplus to requirement against the local planning authority's standards for that location, and the proposed loss will not result in a shortfall during the plan period; or b. replacement for the space or facilities lost is made available, of at least equivalent quantity and quality, and in a suitable location to meet the <u>current and</u> <u>future</u> needs of users of the existing space or facility.	In response to comments

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		Any replacement provision should take account of the needs of the settlement where the development is taking place and the current standards of open space and sports facility provision adopted by the local planning authority. <u>Facilities must</u> <u>be fully inclusive and cater to those of all equality, age, abilities and disabilities.</u>	
		Where necessary to the acceptability of the development, the local planning authority will require developers of new housing, office, retail and other commercial and mixed development to provide open space including play areas, formal sport/recreation areas, amenity areas and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate. These facilities will be secured through the use of conditions and/or planning obligations.	
		Clubhouses, pavilions, car parking and ancillary facilities must be of a high standard of design and internal layout. The location of such facilities must be well related and sensitive to the topography, character and uses of the surrounding area, particularly when located in or close to residential areas <u>and should be accessible</u> by safe, connected, and inclusive walking and cycle routes and public transport <u>networks</u> .	
56	SPTN20	 Proposals which give rise to intrusive floodlighting will not be permitted. POLICY SPTN 20 - UTILITIES AND INFRASTRUCTURE Proposals from mobile phone network operators to improve mobile coverage will be supported where: a. the apparatus is designed and sited to minimise intrusion and visual impact; b. the numbers of radio and telecommunications masts are kept to a minimum consistent with the efficient operation of the network; and 	In response to comments

Page in Pre- Submission Consultation Plan	Para No / Policy in Pre- Submission Consultation Plan	Modification	Reason
		 c. proposals have been sited and designed to minimise the impacts on the rural character of Sproughton, having particular regard to the important views identified on the Policies Map. Where possible, new overhead power and telephone cables/masts should be placed underground. Alternatively, if this is not possible, they must be camouflaged to blend in with the environment. 	
61-63	Policies Maps	Amend Settlement Boundaries to remove areas allocated as new sites in the Joint Local Plan (November 2020). Amend Local Green Spaces in accordance with amendments to Policy SPTN10 Amend boundary of Special Character Area in accordance with amended Map10 above Amend Policies Maps to ensure consistency with the separate Appraisal of Views.	To reflect the current status of the Joint Local Plan
69	Glossary	Insert: <u>Settlement Boundary; A line defined on the Policies Map, which reflects the main</u> <u>built-up areas of the settlement and includes sites allocated in the Plan for</u> <u>development. In general, there is a presumption in favour of development within</u> <u>the Settlement Boundary. Land and buildings outside Settlement Boundary are</u> <u>usually considered to be open countryside where development would be regulated</u> <u>with stricter planning policies.</u>	To provide clarification
71	Errata	Amend as follows: Alison Farmer - Landscape <u>Appraisal Assessment</u> :	To correct error

Appendix 7 – Focused consultation on Buildings of Local Significance letter

Sproughton Neighbourhood Plan	Contact us: sproughtonneighbourhoodplan@gmail.com Phone: 07538 311567
	Parish Council on social Media

Dear Owner/Landlord,

You may be aware that a Neighbourhood Plan is currently being prepared for Sproughton, the purpose of which is to guide development and protect the character of the parish into the future. As part of this, we have been reviewing the buildings within the parish that are not "Listed" but are of local significance and contribute to its heritage and character. Your property is considered to be one of these.

We would like to include your property on a list of Non-Designated Local Heritage Assets to ensure that any development that may be proposed at or around your property considers its special character. The full document can be found on

http://sproughton.onesuffolk.net/neighbourhood-plan/reference-documents/

Its inclusion on this list **does not** prevent you from carrying out any modifications to your property or require you to seek any separate permissions for development that may ordinarily require planning permission. However, were you to propose any work that requires planning permission that would result in the loss of the building or substantial alterations to it, you may be asked by Babergh District Council to provide further information with the application. The District Council would also have to take into consideration how planning applications **by others** in the vicinity of your property would impact on the special qualities of your non-designated heritage property. It will help to ensure that the character of the parish and the historic environment can be protected into the future, which we hope you agree is an important aspect of the Neighbourhood Plan.

We have enclosed a copy of the list of properties throughout the parish, and a copy of your listing, along with this letter, together with the Policy that will help to protect all our homes and parish. The Non-Designated heritage assets document forms an integral part of the Neighbourhood plan ensuring we safeguard our parish.

Should you find that any details included in your listing is incorrect then please contact the Chair of the Neighbourhood Plan Mrs Rhona Jermyn by email at <u>sproughtonneighbourhoodplan@gmail.com</u> or by post at Sproughton Parish Council, Neighbourhood Plan, Tithe Barn, Sproughton, IP8 3AA by 12th June.

The draft Neighbourhood Plan will be submitted to Babergh District Council in the coming months at which time they will undertake a further consultation on it and when you will have a further opportunity to comment. If you wish to be notified when we submit the Neighbourhood Plan to Babergh District Council, please provide your details to the contact above.

Yours faithfully

Appendix 8 - Focused consultation on Local Green Spaces letter

Sproughton Neighbourhood Plan	Contact us: sproughtonneighbourhoodplan@gmail.com Phone: 07538 311567
	Parish Council on social Media

To whom it may concern,

You may know that the Sproughton Neighbourhood Plan team have been collecting and collating information from parishioners. We have arrived at a draft stage of the Plan and part of the evidence base that informs the policies is a Local Green Space Document 2021 - 2036. This is available for viewing on our web-site:

http://sproughton.onesuffolk.net/neighbourhood-plan/reference-documents/

The designation of land as a Local Green Space (LGS) through Local and Neighbourhood Plans allows communities to identify and protect green areas of particular importance to them, these Spaces are often important to the village/parish setting and may include community use.

What are the implications of owning a Local Green Space? Designating the green area as Local Green Space would give it protection consistent with that of Green Belt, but otherwise there are no restrictions or obligations on landowners.

The Neighbourhood team would welcome your views on this, and we would appreciate hearing from you. Should you find that any details included in your listing that is incorrect then please contact the Chair of the Neighbourhood Plan Mrs Rhona Jermyn by email at <u>sproughtonneighbourhoodplan@gmail.com</u> or by post at Sproughton Parish Council, Neighbourhood Plan, Tithe Barn, Sproughton, IP8 3AA by 12th June.

The draft Neighbourhood Plan will be submitted to Babergh District Council in the coming months at which time they will undertake a further consultation on it and then you will have a further opportunity to comment. If you wish to be notified when we submit the Neighbourhood Plan to Babergh District Council, please provide your details to the contact above.

Yours faithfully