

Whatfield Neighbourhood Plan Consultation Statement

December 2020

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1. Introduction

- 1.1. The Whatfield Neighbourhood Development Plan is a community-led document for guiding the future development of the parish. It is the first of its kind for Whatfield and a part of the Government's current approach to planning. It has been undertaken with extensive community engagement, consultation and communication despite the latter part of its production having taken place during two Covid-19 pandemic lockdowns.
- 1.2 The Consultation Statement is designed to meet the requirements set out in the Neighbourhood Planning (General) Regulations 2012 for Consultation Statements. This document sets out the consultation process employed in the production of the Whatfield Neighbourhood Development Plan (WNDP). It also demonstrates how the requirements of Regulation 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 have been satisfied.
- 1.3 The Whatfield Neighbourhood Plan Working Group (WNPWG) has endeavoured to ensure that the Neighbourhood Plan reflects the desires of the local community and key stakeholders, which have been engaged with from the outset of developing the Plan.
- 1.4 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning (General) Regulations 2012.
- 1.5 Section 15(2) of Part 5 of the Regulations sets out what a consultation statement should contain:
 - a) Details of the persons and bodies who were consulted about the proposed Joint Neighbourhood Plan;
 - b) Explains how they were consulted;
 - c) Summarises the main issues and concerns that were raised by the persons consulted;
 - d) Describes how these issues and concerns have been considered and where relevant, addressed in the proposed Neighbourhood Plan.
- 1.6 This consultation statement will also demonstrate that the process undertaken to produce the Whatfield Neighbourhood Development Plan has complied with Section 14 of the Neighbourhood Planning (General) Regulations 2012. This sets out that before submitting a Neighbourhood Plan to the Local Planning Authority (in this case Babergh District Council) a qualifying body (in

this case the Parish Council) must:

- Publicise, in a manner that it is likely to bring it to the attention of people who live or work within Whatfield civil parish,
- ii. Provide details of the proposals within the Neighbourhood Plan;
- iii. Provide details of where, how, and when the proposals within the Plan can be inspected;
- iv. Set out how representations may be made; and
- v. Set out the date for when those representations must be received, being not less than 6 weeks from the date from when the draft proposals are first publicised;
- vi. Consult any consultation body referred to in Para 1 of Schedule 1 whose interests the qualifying body may be affected by the proposals for a Neighbourhood Plan;
- vii Send a copy of the Neighbourhood Plan to the Local Planning Authority.
- 1.7 Furthermore the Planning Practice Guidance (PPG) at paragraph 15, requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan and to ensure that the wider community:
 - is kept fully informed of what is being proposed,
 - · can make their views known throughout the process,
 - has opportunities to be actively involved in shaping the emerging Neighborhood Plan
 - is made aware of how their views have informed the draft Neighbourhood Plan or Order

2. Context for the Whatfield Neighbourhood Development Plan

2.1 The idea of producing a Neighbourhood Plan for Whatfield formally began in on 12th July 2018 following a Parish Council meeting when it was agreed to produce a Neighbourhood Plan.

- 2.2 An application was made to Babergh District Council on 15th July 2018 by the Parish Council to designate the whole of the parish as a Neighbourhood Plan Area. The reason for the application was to develop a vision for the future of the parish which will balance a need for sustainable growth whilst maintaining the positive attributes of its existing "hamlet and countryside" designation. Babergh District Council confirmed the designated NDP area on 18th July 2018.
- 2.3 A Group to oversee and guide the Neighbourhood Plan was established and villagers were invited to form a Working Group to prepare the Plan. The Working Group is made up of residents of a range of ages from all over the village.
- 2.4 Early meetings of the Working Group included a meeting with officers from Babergh to learn about the process and one with the Chair from a neighbouring village to talk of their experiences and advise us. The community of Whatfield understands the necessity of appropriate and sustainable development and has sought to prepare a Neighbourhood Plan to support properly controlled development within the village. The Working Group has been supported by an Independent consultant.
- 2.5 A key driver for the Neighbourhood Plan was to give residents a voice in the sustainable development of the Parish, by building a Plan that is inclusive, innovative and bespoke to the needs of the parish. The Plan is based on evidence from local people, preserving unique and positive features that residents' value. It promotes community cohesion and develops a framework for economic, social and environmental sustainability.
- 2.6 To spread the word about the emerging Neighbourhood Plan, the Working Group agreed engagement needed to be effective throughout the process if it were to result in a well-informed plan and a sense of local ownership. Communication is dealt with in **Section 5** of this statement.

3. Designation of the Neighbourhood Plan Area

3.1 Whatfield Parish Council applied to Babergh District Council for the entire parish to be designated a Neighbourhood Plan area on the 15th July 2018. The application was approved on 18th July 2018. The Whatfield NDP Area Designation Application, the Neighbourhood Area Map and Designation Statement can all be found on Babergh's website:

https://www.babergh.gov.uk/planning/neighbourhood-planning/neighbourhood-planning-in-babergh/whatfield-neighbourhood-plan/

- 3.2 The Neighbourhood Plan area application and Map can be found in full at **Appendix A.**
- 3.3 The Neighbourhood Plan Area Decision Notice can be found in full at **Appendix B**.

4. Community Engagement Stages

- 4.1 The Whatfield Neighbourhood Plan Working Group led on the preparation of the draft plan and it is hoped that the document reflects the community's vision and aspirations for the future of the parish. In order, to create a Plan that represents the needs and aspirations of residents, the Working Group have drawn upon a number of sources including evidence gathered through the various stages and as a result of stakeholder and community input.
- 4.2 The management of the Neighbourhood Plan process has been undertaken by the Working Group Members themselves with support from the independent consultant, the Parish Council and other local residents as required.
- 4.3 There is a dedicated Neighbourhood Plan web page which contains details of the progress of the Neighbourhood Plan, notes from Working Group meetings, together with details of consultation stages. There are also contact details on the website for anyone wishing to receive direct updates on the progress of the Neighbourhood Plan. The Whatfield Neighbourhood Plan website has been updated regularly to provide information to residents about the process and as well as advance notice of any consultations or events and any write ups from those events.

http://whatfield.onesuffolk.net/neighbourhood-plan/

4.4 Details of the consultation events were also published in the Parish newsletter as well as regular updates on the progress of the Neighbourhood Plan. An update for the Parish Council on Neighbourhood Plan progress was presented at every meeting.

4.6 The Whatfield Neighbourhood Plan has been undertaken with extensive community engagement, consultation and communication. There have been 3 stages in which the Neighbourhood Plan Working Group has actively engaged the community through consultation.

Community Engagement Stages

4.7 Below is a summary of each of the stages of the Neighbourhood Plan's preparation.

Stage 1: Decision to Proceed – July 2018-October 2018

 Parish Council meeting held on 12th July 2018, where the pros and cons and implications of producing a Neighbourhood Plan for Whatfield were discussed. Parish Council voted unanimously to proceed with a Neighbourhood Plan and Neighbourhood Plan Working Group established with first meeting in October 2018.

Stage 2: Evidence Gathering and Identification of Key Issues- November 2018 to May 2019

- Neighbourhood Plan Working Group began to compile a statistical evidence base to support the plan preparation including collation of demographic, environmental and housing data.
- Draft mission statement produced.
- Meetings with Babergh Officers and Chairman of an adjacent
 Neighbourhood Plan Group Tom from Lawshall to learn about best practice
- Work began on producing a questionnaire to go to all households in the parish to help identify key issues

Stage 3: Consultation 1 – Residents' Questionnaire – June and July 2019

- Questionnaire Launch Event held at the Village Hall on 7th June 2019.
 The purpose of the launch was to publicise the questionnaire, promote the Neighbourhood Concept and answer any questions from the public.
- Event was attended by over 40 residents.
- Residents were invited to collect a copy of the questionnaire; the remaining questionnaires were delivered to every household within the Neighbourhood Plan area.

- The questionnaire was accompanied by a photographic study of the village which residents were invited to comment upon.
- 170 completed questionnaires were returned (58.5%)

Stage 4: Analysis of Questionnaire results; identification of policy ideas and plan drafting – September 2019- February 2020

- The questionnaire results were analysed during September and key themes emerged around housing numbers, design of new dwellings, dwelling typology, materials and local character.
- Drafting of the Neighbourhood Plan policies began in November 2019 with supporting text following in January and February 2020.
- Meeting held with landowners in January 2020 to explain the timetable and process.

Stage 5 : Consultation 2 - Informal Consultation with Residents on emerging Draft Plan - May 2020

- Three separate drop in exhibition sessions were planned on 20th, 27th
 March and 3rd April respectively but were cancelled due to the COVID-19 pandemic.
- Instead copies of the plan were emailed around to residents during May via an email 'chain' and comments were sought.
- Comments received were analysed and changes made to the Plan during June 2020

Stage 6 : Consultation 2 – Pre-Submission (REG14) Consultation on Draft Plan – August to October 2020

- The purpose of this consultation was to present the draft presubmission Neighbourhood Plan to obtain comments from both residents and statutory consultees. The consultation was held for 9 weeks between 5th August 2020 and 7th October 2020. The draft plan was available on-line (with an online consultation response form) and in hard copy by request.
- The Parish Newsletter publicised the consultation twice and posters and flyers were put up around the village

Key Issues Arising from early consultation

- 4.10 Initial analysis undertaken by the Working Group of the results of the questionnaire reveals a number of issues for the parish with some consistent themes emerging.
 - Strong support for the protection of existing village amenities
 - Strong support for the protection of the surrounding landscape and protection of rural character
 - Most support for new housing numbers of around 8 new dwellings
 - Most support for family housing
 - Support for a mix of traditional and contemporary design
 - Support for high quality design and traditional and eco-friendly materials
 - Strong support for off street parking
 - Support for key worker housing
 - Rural character of the village is important
 - Concern that new development will spoil countryside views
 - High traffic speeds through the village
 - Concern over the design and visual appearance of recent new developments
 - Some concerns over the integration of affordable housing development
 - Little appetite for large scale village expansion
 - Lack of footways in the village
- 4.11 The themes that emerged through the questionnaire results, and the informal consultation with local residents in May 2020, helped to shape the REG 14 Pre-Submission Neighbourhood Plan's Vision, objectives, and policies.

<u>Pre-Submission Consultation (Regulation 14) – 5th August 2020 to 7th</u> <u>October 2020</u>

- 4.12 The results of the informal consultation with the community were considered in detail by the Volunteer Group in June 2020 and as there was little sign of the possibility of further face to face consultation being permissible under the social distancing regulations, work began on drafting the pre-submission version of the Plan.
- 4.13 The Pre-Submission Regulation 14 Consultation was undertaken between 5th August 2020 and 7th October 2020. The consultation lasted for approximately 9 weeks. The consultation began with an electronic copies of the draft plan

- available on the Parish website, an article in the parish newsletter and hard copies of the plan and the form available in the telephone box.
- 4.14 Copies of the response forms were available on the website. A copy was also sent to Babergh District Council who included details of the consultation on their Neighbourhood Plan website:

https://www.babergh.gov.uk/planning/neighbourhood-planning/neighbourhood-planning-in-babergh/whatfield-neighbourhood-plan/

- 4.15 Notifications of the consultation and details of how to view the draft plan and submit and return comments were sent to a wide range of consultees. The list of consultees is shown at **Appendix G**.
- 4.17 Following the closing date of the Pre-Submission Consultation 3 responses had been received from members of the public including local landowners. In addition, responses had also been received from the following consultees:
 - Babergh District Council
 - Natural England
 - Historic England
 - Suffolk Preservation Society
 - Anglian Water
 - National Grid
 - Ipswich and East Suffolk CCG
 - Kersey Parish Council
 - Suffolk County Council
- 4.18 The key issues raised by the REG14 Pre-Submission Consultation undertaken between August and October 2020 were as follows:
 - General support for policies subject to some minor wording amendments
 - Request for a specific allocation for new housing development on land North of The Street
 - Request for land North of the Street to be protected as a green space/important view
 - Concern that the plan was not planning for enough new housing over the plan period
 - Concern that the Plan's policies would allow for too much development over the Plan period
 - New development should only take place within the existing settlement boundary and consist only of single dwellings
 - Clarification required over the mapping of the areas identified for

protection under Policy WHAT1

- 4.19 Following consideration of these representations the following key changes were made to the NDP policies:
 - Factual updates and correction of errors
 - Minor amendments to wording of Objective 4
 - New text in paragraph 6.4 to reinforce the importance of the identified views
 - Clarification of the areas to be identified in Policy WHAT1
 - Amendments to wording of Policy WHAT3 to reflect recent court judgement on Local Green Spaces
 - Amendments to supporting text and policy wording relating to Policy WHAT6 to provide clarity
 - Amendments to mapping

REG 16 – Submission

- 4.20 Following consideration of the revised Neighbourhood Plan documents at the Working Group meeting of 25th November 2020 and approval by Whatfield Parish Council on 2nd December 2020, the Neighbourhood Plan and its supporting documents were submitted to Babergh District Council.
- 4.43 The documents together with this Consultation Statement and the Basic Conditions Statement can be viewed at:

https://www.babergh.gov.uk/planning/neighbourhood-planning/neighbour

and

http://whatfield.onesuffolk.net/neighbourhood-plan/

5. Communication

- 5.1 Good communication is key to the local community feeling included and informed about the progress and content of the Whatfield Neighbourhood Plan.
- 5.2 The following methods were used by the Working Group to bring attention to the Neighbourhood Plan and to encourage feedback:
 - Parish Council website http://whatfield.onesuffolk.net/neighbourhood-plan/

- Flyers delivered around the parish delivered by Working Group Members
- Event posters which went up throughout the Parish
- Regular articles and updates in the Parish Magazine
- Village meeting to launch the questionnaire
- 5.3 Communicating with residents through the development of the Whatfield Neighbourhood Plan has been particularly important throughout the process. The community has been (and will continue to be) engaged through the village Newsletter, website, meetings and working groups to ensure optimum engagement.

6. Conclusion

- 6.1 The programme of community engagement and communications carried out during the production of the Whatfield Neighbourhood Plan was extensive and varied. It reached a wide range of the local population and provided opportunities for many parts of the local community to input and comment on the emerging policies.
- 6.2 The comments received throughout and specifically in response to the consultation on the REG14 Pre-Submission draft of the Whatfield Neighbourhood Development Plan have been addressed, in so far as they are practical, and in conformity with the National Planning Policy Framework and the policies in the Development Plan for Babergh and the emerging Babergh-Mid Suffolk Joint Local Plan.

Appendices

Appendix A - Application for Neighbourhood Plan Area Designation

Application to Designate a Neighbourhood Plan Area

Town and Country Planning Act 1990
Neighbourhood Planning (General) Regulations 2012 (as amended)

.....

Publication of applications on the Babergh / Mid Suffolk District Council websites:

Please note that the information provided on this application form may be published on the Authority's website. If you require any further clarification, please contact: communityplanning@baberghmidsuffolk.gov.uk

* Indicates a mandatory field

erk details
Mrs
Lynn
King
Steddings
The Street
Whatfield
Suffolk
pc@whatfield.suffolk.gov.uk

2. Additional contact (if different)					
Title	Mrs				
First Name	Helen				
Last Name	Landon				
Prop name or no.					
Address 1					
Address 2					
Address 3					
Town	Whatfield				
County	Suffolk				
Postcode					
Email:					

3. Relevant body:

Please confirm that you are the relevant body to undertake neighbourhood planning in your area in accordance with section 61G of the 1990 Act and section 5C of the 2012 Regulations.

Yes	~	* District: Babergh District Council
No		

If 'Adjacent LA / Parish has been selected please provide details

N/A	

4.	Name	of	the	Neig	hbo	ourh	nood	Area:
----	------	----	-----	------	-----	------	------	-------

Please give a name which your neighbourhood area will be formally known: *

Whatfield Parish Neighbourhood Plan

5. Extent of the area:

Please indicate below the intended extent of the area: *

✓ Whole parish boundary areaPart of the parishJoint with neighbouring parish

provided with one) (Already have one)

Reminder: Your application needs to be accompanied by an OS plan showing the area. We can produce this for you so please ask if you have not already done so. Would you like our assistance producing an OS plan? (if you haven't already been

Yes	~
No	

To satisfy Regulation 5 of the Neighbourhood Planning (General) Regulations 2012, a statement is required to explain why the proposed neighbourhood plan area is considered appropriate in order for it to be designated. Please provide a statement below that explains why you consider the extent of the neighbourhood area appropriate *

The Neighbourhood Plan will include the entire area enclosed within the existing parish boundary. This is because ;

- it is an existing and obvious community entity
- it conforms to the electoral base which will be consulted on, and participate in, the development of the Plan and eventual decision making

.....

6. Intention of Neighbourhood Area:

Please indicate which of the following you intend to undertake within your neighbourhood area: *

Neighbourhood Development Plan
Neighbourhood Development Order
Community Right to Build Order

Please provide support for your choice below. For example, which parish and community meeting has the above choice been discussed at? Are the community aware of what is being proposed and why? Do the community support the choice selected? *

A proposal to develop a Neighbourhood Plan was discussed at the Parish Meeting on 12th July 2018. The Parish Council subsequently resolved to proceed on this basis.

The community has been (and will continue to be) engaged through the village Newsletter, website, meetings and working groups to ensure optimum engagement.

The initial objective is to develop a vision for the future of the parish which will balance a need for sustainable growth whilst maintaining the positive attributes of its existing "hamlet and countryside" designation

7. Adjoining parish clerk details (multi-parish area):

If you are applying with an adjoining parish or parishes please give the clerk's details for each parish:

Not applicable	

8. Declaration:

I/we hereby apply to designate a neighbourhood area as described on this form and the accompanying plan.

Name(s) *	Lynn King and Helen Landon
Date (dd/mm/yy) *	15/07/2018

Appendix B – Neighbourhood Plan Area Decision Notice



NEIGHBOURHOOD PLAN AREA DESIGNATION NOTICE WHATFIELD PARISH NEIGHBOURHOOD PLAN

Babergh District Council received an application from Whatfield Parish Council (the 'Relevant Body') to designate the whole of the parish as a Neighbourhood Plan Area on the 15 July 2018.

The application was made under Regulation 5 of the Neighbourhood Planning (General) Regulations 2012 (as amended). A copy of the application and a map which identifies the area to which this relates can be found on the District Council website at:

https://www.babergh.gov.uk/WhatfieldNP

Regulation 5A states that ... "where (1)(a) a local planning authority receives an area application from a parish council" and (1)(b) the area specified in the application consists of the whole of the parish council's area, (2) the local planning authority must exercise their powers under section 61G of the Town and Country Planning Act 1990 to designate the specified area as a neighbourhood area."

Regulations 6 and 6A relating to publicising an area application do not apply in this instance. Therefore, in accordance with Regulation 5A (2) and 7 (1) of the Neighbourhood Planning (General) Regulations 2012 (as amended) Babergh District Council hereby give notice that it has designated Whatfield parish as a Neighbourhood Area in order to facilitate the preparation of a Neighbourhood Plan by Whatfield Parish Council.

Tom Barker

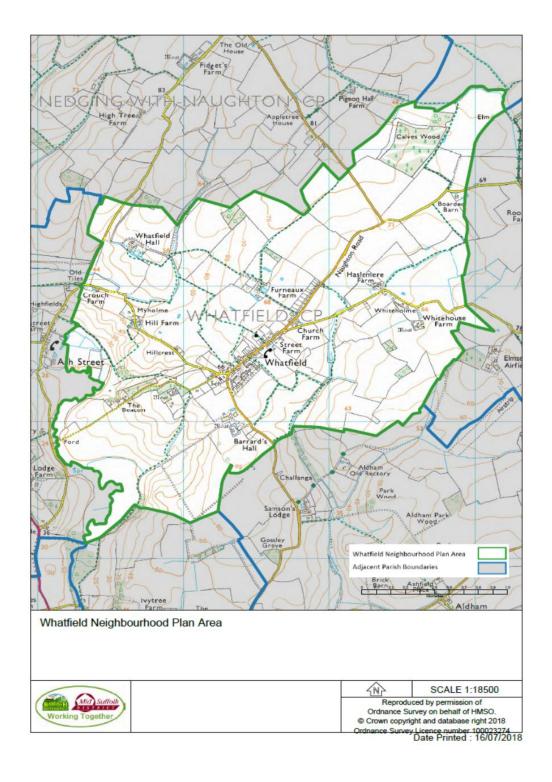
Assistant Director - Planning for Growth Babergh and Mid Suffolk District Council

Dated: 18 July 2018

Babergh District Council
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
Telephone: (0300) 1234 000
SMS Text Mobile: (07827) 842833
www.babergh.gov.uk

Mid Suffolk District Council
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
Telephone: (0300) 1234 000
SMS Text Mobile: (07827) 842833
www.midsuffolk.gov.uk

Appendix C – Neighbourhood Plan Area Map



Appendix D - Residents' Questionnaire and contextual evidence

Whatfield Neighbourhood Plan Questionnaire

Context

The last Village Plan was published in 2007, and has influenced planning matters over the intervening period. Numerous "Actions" were identified which have led to some notable and laudable improvements to our environment. For this we are enormously grateful.

However, the combination of time passing and new government legislation has resulted in the need to re-address Village ambitions and the preparation of a "Neighbourhood Plan".

This form of document is different to the Village Plan. The latter was non statutory and was not planning based. It covered general Village ambitions and aspirations.

A Neighbourhood Plan is very different. It is solely focussed on planning matters and is a statutory document, forming part of the wider Babergh Development Plan with the same status as a Local Plan – simplistically it has real influence and will give residents comfort that they have a robust mechanism to enforce the interests of the Parish.

During 2018, two separate land owners approached the Parish Council advising of the intention to pursue the re-development of 2 agricultural fields at either end of the village into residential developments (one opposite Wheatfields and the other opposite the row at Naughton Road). The illustrative scheme proposals detailed 15 and 16 houses, respectively.

The Parish noted the broad negative response to these outline proposals, primarily driven by the concern that substantial development was being imposed on the Village prematurely (and without due consideration) as a consequence of a perceived weakness in planning legislation and the opportunity for landowners to exploit this.

The perceived "ad hoc" nature of these approaches has resolved the Parish to take positive action and ensure its voice is heard during the planning process – A Neighbourhood Plan is the best way to achieve this and it will form a material consideration in Babergh's assessment of any future planning applications. If we had a Neighbourhood Plan now, we would not be exposed to the stresses of opportunistic planning applications. The views and opinions of the Parish would be evident and duly considered as part of the planning process.

It is important to note that the process is not "anti-development". The process is democratic enabling all to make their views clear. The final Whatfield Neighbourhood Plan will condense Parish sentiment into "Policies" which will be designed to ensure the Parish has a voice of influence and is not just a passive bystander.

We believe engaging with and informing the development process will deliver an "enduring environmental, affordable and high quality built legacy for our future generations".

This is our current motivation statement and following broader feedback from the Village, we will refine and develop our "Vision Statement" which will introduce our Draft Plan.

Failure to achieve a Neighbourhood Plan could lead to ill prepared, opportunistic development, not taking into consideration the Village's needs. This could erode the intimate "characterfulness" of our village that we cherish.

The residents are the long-term stakeholders in Whatfield, so it is vital any developers (whom are short term, often having no ongoing relationship) are fully aware of our expectations when it comes to development in terms of scale, quality and form.

Consequently, a Neighbourhood Plan Working Party (NPWP) has been established.

We have also instructed an Independent Town Planning Consultant on behalf of the Parish (Andrea Long MRTPI) with extensive experience in Neighbourhood Planning. Andrea is supporting and advising throughout the process to ensure the appropriateness and deliverability of our Plan.

The aim is to produce a Neighbourhood Plan reflective of Village aspirations around the delivery and scale of new development over the plan period (up to 2036) as well as its design, form and quality.

The NPWP has started to identify the key issues to the Village. It has researched our existing Village Plan (2007), other Village Plans as well as having discussion with some residents and NPWP members from other Villages who are more advanced.

The feedback / view to date is to focus our Neighbourhood Plan on a few key subjects – notably the scale, form (character) and quality of development, its environmental, physical and spatial qualities.

Above all, the NPWP believe any future development should be high quality in external character, environmentally considerate and at a density which is not intrusive / overwhelming to the existing housing stock. The scale of growth will be informed via the feedback from Parishioners to this questionnaire.

This process will provide clarity on the consensus view for Parish housing growth over the period. What it will not do is identify the location of development. This is a conscious decision.

The NPWP and its consultant has taken the view that once housing growth / need is established, it will be up to the landowners to promote their option to Babergh District Council. The onus will therefore be on Babergh District Council (who are the statutory body) and the Parish (when consulted) to assess the merits of each proposal, based upon a professional and impartial view. This will provide an element of competitive tension between promoters, which should in turn lead to more outstanding development proposals.

Please add any comments on the above or additional points that you feel are relevant:

Comment:			

Parish Development since 2007

Since 2007, Whatfield has experienced significant relative growth (24 new dwellings - 18% growth) in both new housing numbers and population. The last Village Plan in 2007 reported 134 occupied households in the Parish. There are now 158 dwellings.

Net additions to housing over the period are:

- ♦ Sheckie Meadow 6 new affordable dwellings completed in 2015
- Church Farm Place (Notcutts) 15 new dwellings (5 affordable, 10 private sale) completed in 2018
- Walnut House, The Street completed in 2012
- Ashcroft, The Street completed in 2012
- ♦ Homeside, The Street completed in 2018

The Neighbourhood Plan Process

The process consists of 3 distinct parts.

- ♦ Stage 1 Evidence Gathering
- Stage 2 Plan Draft
- Stage 3 Examination and Referendum

A more detailed explanation is attached to this Questionnaire.

In essence, this questionnaire (and accompanying Photographic Study) forms the backbone of Stage 1.

Once we have received feedback from the Village via the questionnaire process, we will endeavour to prepare the Draft Plan, and thereafter submit (with the Stage 1 evidence) for Stage 3.

We have attached to this Questionnaire a number of documents which will hopefully assist Parishioners with their consideration. These are:

- Appendix 1 Whatfield Parish Photographic Survey
- ◆ Appendix 2 Whatfield Village Plan 2007
- Appendix 3 Whatfield Census Data 2015
- Appendix 4 General Parish data

Whatfield Village Amenities

The Village has a wide range of amenities and this questionnaire provides the opportunity to seek feedback from the Parish on how we value their contribution to Village life and wellbeing.

Vill	age	Am	renit	ies:

- Village Hall
- Church
- Allotments
- ♦ Church Farm Place Green
- ♦ Buckle's Meadow
- ♦ Hunty's Vale
- Rectory Road Conservation Area
- Glebe Field
- Playground
- Sportsfield
- Special Landscape Area
- ♦ Footpath network
- Salvation Army Hall
- Phone Box
- 1. Should all village amenities be protected from redevelopment?
- Strongly agree
- Agree
- Disagree
- Indifferent

Comment:			

- 2. Do you believe that the rural landscape surrounding the Village is an important characteristic and amenity and should be protected from development?
- Yes
- No
- Indifferent

Comment:	

Whatfield Housing Growth over Neighbourhood Plan Period

Whatherd Housing Growth over Neighbourhood Flant Friod
3. How would you describe the rate of housing growth in the Village over the past 5 years?
 Excessive Appropriate Insufficient Indifferent
Comment:
4. What proportion of housing growth do you believe the current Village can sustain over the Neighbourhood Plan period (up to 2036)?
 Nil 2% @ 3 dwellings 5% @ 8 dwellings 10% @ 16 dwellings 15% @ 23 dwellings 20% @ 31 dwellings Other – please state
Comment:
 5. How would you like to see the delivery of the housing growth? Infill development within existing village boundary of single plots Small developments between 2 & 10 dwellings
Developments above 10 dwellings
Comment:

6. What do you consider to be the best way to accommodate new housing growth over the Plan

period?
 Steady, incremental and gradual across the whole plan period Rapid and in one large phase Indifferent
Comment:
7. What type of housing would you like to see? (please note, Babergh Planning Policy provides for affordable housing within all developments)
 ◆ Semi detached family housing ◆ Detached family housing ◆ 1-2 bedroomed houses ◆ Other – please specify
Comment:
8. Do you believe the ∀illage should influence future developments in terms of design, quality, amenity, character and appearance?
 ◆ Strongly agree ◆ Agree ◆ Disagree ◆ Indifferent
Comment:

Whatfield Village Design Code Questionnaire

We have prepared a detailed photographic study of the Village and in particular features of existing buildings. This is attached to this questionnaire (Appendix 1) with the aim of allowing villagers to identify particular details, features and styles to support their responses to the questions below. We would ask Villagers to review this document prior to responding to the below questions.

- 9. What vernacular (design style) do you believe is appropriate for future dwellings in our Village? Please tick the types you would like to see:
- ♦ Traditional Suffolk Vernacular
- Contemporary / modern with notes of traditional Suffolk Vernacular (ie a bit of both)
- Contemporary / modern

Comment:			

- 10. What house types do you believe is appropriate for future dwellings in our Village? Please tick the types you would like to see:
- Farm house style
- Cottage style
- Barn style
- Townhouse style
- ◆ Bungalow
- Indifferent

Comment:		

11. Do you believe building materials (notably brickwork and roof tiles) for all new dwellings should be high quality locally crafted and domestically made materials?
 ◆ Strongly agree ◆ Agree ◆ Disagree ◆ Indifferent
Comment:
12. Do you believe the exterior construction of all new dwellings in our village should include high levels of craftsmanship, design and high quality detailing (detailed design features etc) that are evident in the local character?
 ◆ Strongly agree ◆ Agree ◆ Disagree ◆ Indifferent
Comment:
13. Do you believe the design of housing should be bespoke to Whatfield, prepared by a notable relevant architectural practice and not a "standard house type" as often promoted by national housebuilders?
 ◆ Strongly agree ◆ Agree ◆ Disagree ◆ Indifferent
Comment:

14. Do you believe the Parish of Whatfield should promote and insist on high quality design for the development of new housing?	ne
 Strongly agree Agree Disagree Indifferent 	
Comment:	
15. Do you believe construction materials on all new dwellings should be environmentally responsing "green materials" with an onus on sustainable design principles (for example excluding plastics where possible on all visible external features, fixtures and fittings / using domestica made organic products / minimising carbon footprint through responsible material sourcing e	l lly
 Strongly agree Agree Disagree Indifferent 	
Comment:	
16. Do you believe construction materials on all new dwellings should be high quality organic / n. materials (including either durable hardwood windows, window frames, sills, doorframes, sof fascia's and doors etc)?	
 Strongly agree Agree Disagree Indifferent 	
Comment:	

17. What size gardens do you believe new houses in developments in Whatfield should have (considering the need for maintenance, child play, wellbeing & self-sufficiency [vegetable gardens etc])?

The following are examples of building footprint to garden size in the village:



Small Garden – this is a new house at Church Farm Place.

The building footprint occupies approximately 23% of the total plot



Medium Garden – this is a house at Wheatfields.

The building footprint occupies approximately 13% of the total plot



Large Garden – this is a house at The Street.

The building footprint occupies approximately 8% of the total plot



Large Garden – this is a house at Naughton Road.

The building footprint occupies approximately 7% of the total plot

	•	Large -	up 1	to	8%	of	building	foot	prin
--	---	---------	------	----	----	----	----------	------	------

- ♦ Medium- 8 to 16% building foot print
- Small 16 to 24% building foot print
- Patio over 24% of building footprint
- Indifferent

Comment:			

- 18. Do you believe all new dwellings should have adequate sized and an appropriate number of garage facilities (in addition to off street parking areas) to reflect 1 space per car?
- Strongly agree
- Agree
- Disagree
- Indifferent

Comment:	

- 19. Do you believe all new dwellings should have integrated storage for refuse and recycling?
- Strongly agree
- Agree
- Disagree
- Indifferent

Comment:	

20. Do you believe all new dwellings should have adequate space and services that can be easily adapted to enable working from home?
 Strongly agree
♦ Agree
 Disagree Indifferent
Comment:
21. What style of driveways & parking areas would you like to see?
Golden Gravel
Grey Gravel
◆ Tarmac ◆ Brick
Other – please state:
♦ Indifferent
Or respond via Photographic Study
Comment:
22. Do you believe all new dwellings should have rainwater harvesting and grey water recycling
facilities from all roof guttering into a permanent water well?
Strongly agree
AgreeDisagree
◆ Indifferent
Comment:
Common.

23.		lieve all new dwellings should be considerate to wildlife and promote features such as swift bricks?					
٠	Strongly agree						
•	◆ Agree						
•	Disagree						
•	Indifferent						
Co	omment:						
 24. Do you believe the external quality, design and materials of all new affordable housing dwellings should be 100% identical to the housing for sale? Strongly agree Agree Disagree Indifferent 							
Co	omment:						
25. Do you believe all new affordable dwellings should be "pepper potted" amongst the market for sale housing (ie mixed in and not in a defined separated area as with Church Farm Place)?							
•	Strongly agree						
•	Agree						
*	Disagree Indifferent						
Co	omment:						

26. Do you believe some new affordable dwellings should provide for key workers in the community (agricultural workers, school teachers, nurses, fire fighters, priests etc)?						
 ◆ Strongly agree ◆ Agree ◆ Disagree ◆ Indifferent 						
Comment:						
27. Is it important to ensure that the type of affordable housing allocated to Whatfield should fully meet the economic, social and environmental needs of its future occupiers?						
 ◆ Strongly agree ◆ Agree ◆ Disagree ◆ Indifferent 						
Comment:						
28. We would like you to add any additional comments on matters which we have not covered that are important to you. Have we missed anything?:						
Comment:						

WHATFIELD - MARKET RESEARCH

DATA RELATES EITHER TO BABERGH (LOCAL AUTHORITY AREA) OR CENTRED ON IP7 6QR (THE VILLAGE CHURCH)

WORDCLOUD - HOUSEHOLDS WITHIN 10KM



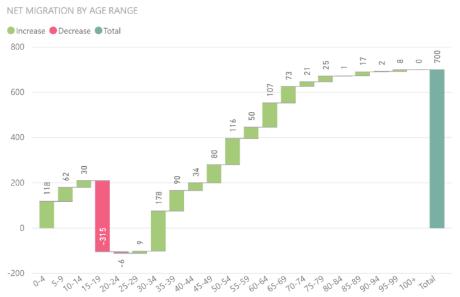
Source: MOSAIC Type descriptions

WORDCLOUD - WITHIN 2KM



Source: MOSAIC Type descriptions

INTERNAL MIGRATION



Source: ONS Internal Migration

Internal migration to Babergh in the 12 months to June 2017 resulted in the population of the area increasing by 700. The only age bracket to experience a significant net exodus was between 15-19, principally the result of young undergraduates heading to university.

The age group seeing the largest influx was those aged 30-34 (with a net gain of 178), the increase of those aged 0-4 is linked to this, as young families move to the area.

There is also interest from those looking to move later in life, with a net gain of 254 residents 60 or over.

DEMOGRAPHIC PROFILE

Households within 10km of the village church have been examined to establish the demographic profile of the area.

TOP SIX HOUSEHOLD GROUPS WITHIN 10KM £70,000 £64,571 1,831 4.825 OTHER HOUSEHOLDS 4,000 £60,000 3,353 3,000 HOUSEHOLDS 2,000 £45,584 £50,000 🖯 £37,216 £40,000 994 860 1,000 £30,000 £32,707 £20,846 £20,000 Country Living Rural Reality Aspiring Senior Security Suburban Stability

GROUP NAME	GROUP DESCRIPTION	H'HOLDS	AVE INCOME
Country Living	Well-off owners in rural locations enjoying the benefits of country life	4,825	£64,571
Rural Reality	Householders living in inexpensive homes in village communities	3,353	£32,707
Aspiring Homemakers	Younger households settling down in housing priced within their means	994	£45,584
Senior Security	Elderly people with assets who are enjoying a comfortable retirement	860	£20,846
Suburban Stability	Mature suburban owners living settled lives in mid-range housing	619	£37,216
Prestige Positions	Established families in large detached homes living upmarket lifestyles	396	£69,259
Vintage Value	Elderly people reliant on support to meet financial or practical needs	364	£9,592
Domestic Success	Thriving families who are busy bringing up children and following careers	352	£64,698
Transient Renters	Single people privately renting low cost homes for the short term	230	£24,267
Modest Traditions	Mature homeowners of value homes enjoying stable lifestyles	199	£24,439
Family Basics	Families with limited resources who have to budget to make ends meet	152	£26,374
Municipal Challenge	Urban renters of social housing facing an array of challenges	65	£12,140
Rental Hubs	Educated young people privately renting in urban neighbourhoods	54	£32,039
Urban Cohesion	Residents of settled urban communities with a strong sense of identity	17	£18,565
City Prosperity	High status city dwellers living in central locations and pursuing careers with high rewards	2	£147,050
Total	12 482	£46 368	

Source: MOSAIC (red - household income under £40k, green - £40k and above)

Demographic data has been examined within 10km of Whatfield Church, this has been split into five areas to establish how the village fits in with its surroundings. There are 12,482 households, with an average income of $\pounds46,368$

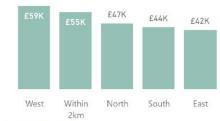
Households within 2km have been compared with those in compass point quadrants between 2 and 10 km from the church.



Source: MOSAIC

The data suggests there are just 178 households within 2km of the subject site, with an average household income of £54,500. The largest group, comprising 72% of all households, is "Country Living", described as "Well-off owners in rural locations enjoying the benefits of country life".

AVERAGE HOUSEHOLD INCOMES SURROUNDING SITE

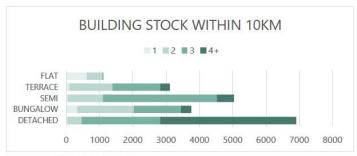


Source: MOSAIC

Households within 2km of the site have higher income levels than those within 10km, with an average of £54,574 within 2km compared to £46,368 within 10km.

BUILDING STOCK

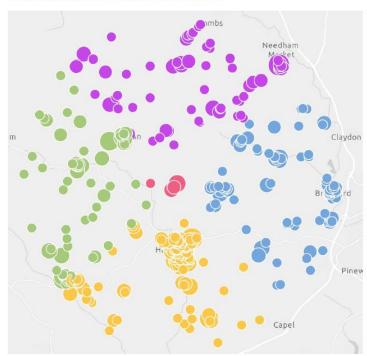




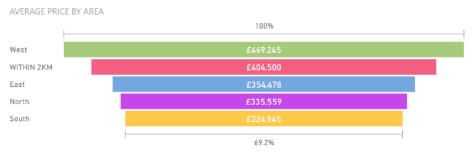
Source: VOA Building stock

Compared to the wider region, stock within 2km of the site has significantly lower proportions of terraced properties, forming just 6% of stock, compared to 16% of stock within 10km.

LAND REGISTRY PRICE PAID DATA



Source: Land Registry Sales since January 2017



Source: Land Registry Sales since January 2017

The average price of a property sold within 2km of the village church since January 2017 was £404,500, there have been just 11 sales recorded over this time period.

 LOCAL MARKETS BY PROPERTY TYPE

 TYPE (ALL) □1) FLAT □2) TERRACED □3) SEMI □4) DETACHED

 South 28% 25% 46%

 East 13% 34% 51%

 West North 6% 31% 62%

 WITHIN 2KM 18% 82%

Source: Land Registry Sales since January 2017

Properties sold within 2km were predominantly detached, being 82% of sales. To the south this figure fell to 46%.

AVERAGE PRICE BY PROPERTY TYPE AND AREA ● 1) FLAT ● 2) TERRACED ● 3) SEMI ● 4) DETACHED £0.6M £460,234 £421,333 £411,485 £389,208 £328,750 £0.4M £279,174 £261,113 £261,412 £228,145 £208,853 £119,950 £106,000 £0.2M £93,938 £0.0M WITHIN 2KM North South

Source: Land Registry Sales since January 2017)

Appendix E – Photographic Survey

Whatfield Neighbourhood Plan Questionnaire Photographic Study – April 2019

Dear Parishioner

This document is to be considered in conjunction with the Questionnaire.

The purpose is to identify the physical characteristics in our Parish that enriches our

built environment and wellbeing. Feedback from the Parish will inform our Policies

and the quality of any future new development.

We would ask you give this document due consideration and pay particular attention to the detailing that inspires you. Be specific about what characteristics you value. This is vital. The more we put in, the more we will get......

Add key words / comments into the boxes provided and highlight imagery that you particularly like.

We have a diverse range of property types and ages in the Parish. Within them all lie some truly delightful and inspiring detailing. Identifying and promoting these will add richness and quality to our environment.

Whatfield Neighbourhood Plan – Consultation Statement – December 2020





































What inspires you?



























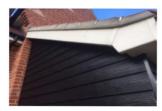


































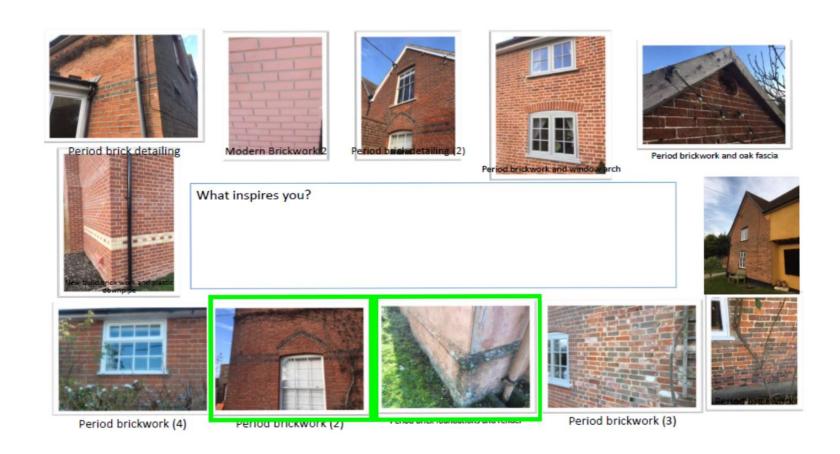




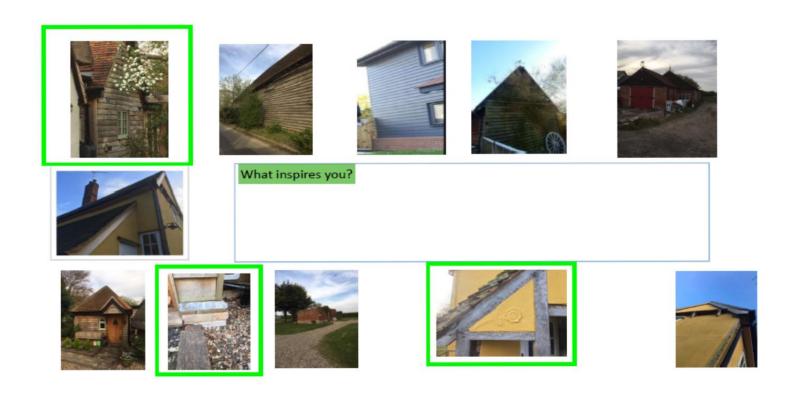
























What inspires you?























What inspires you?



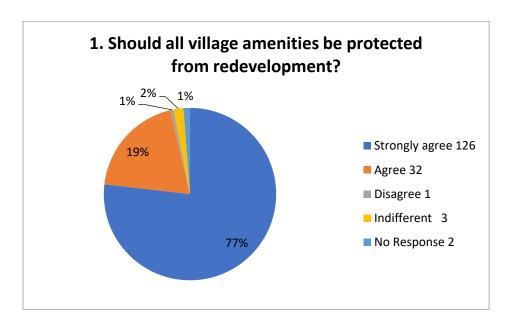


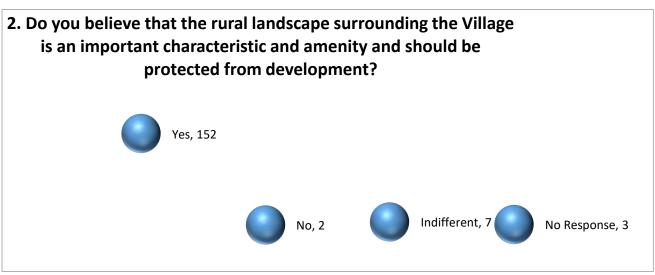


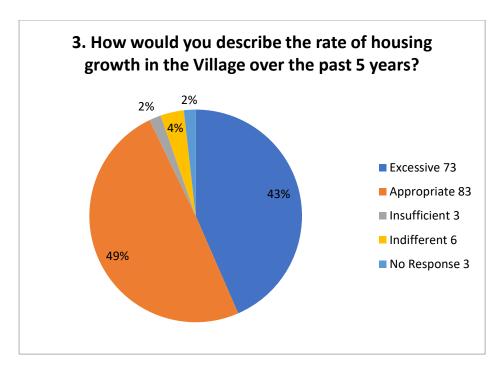


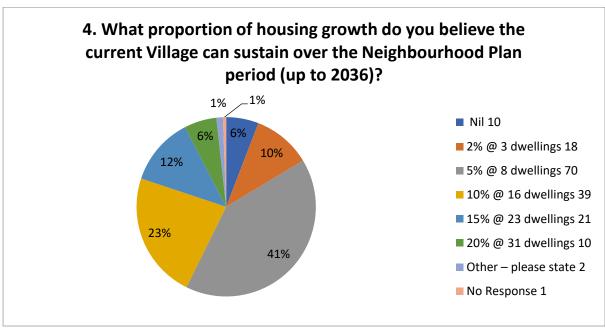


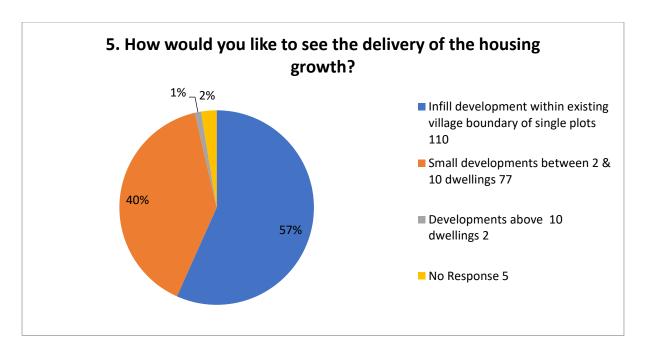
Appendix F - Questionnaire Results

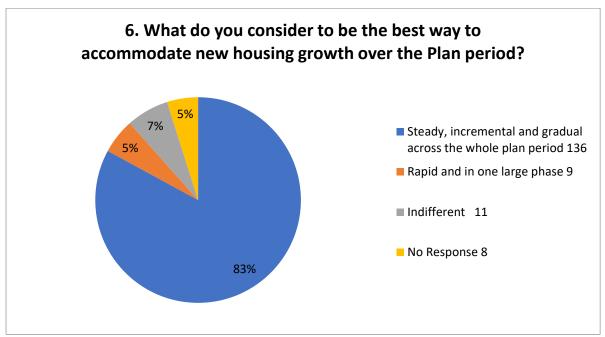


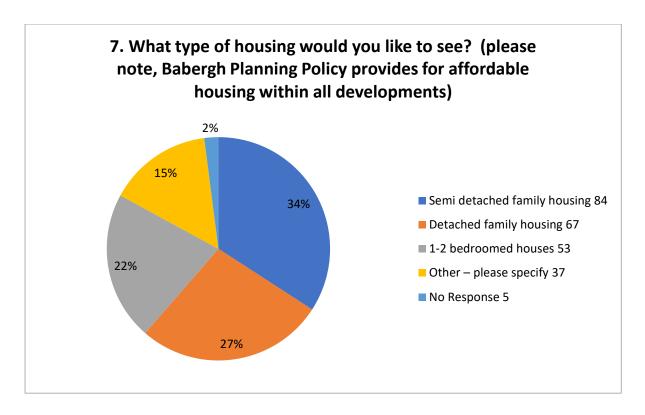


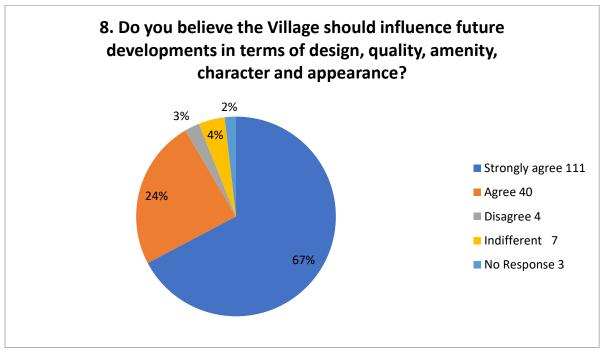


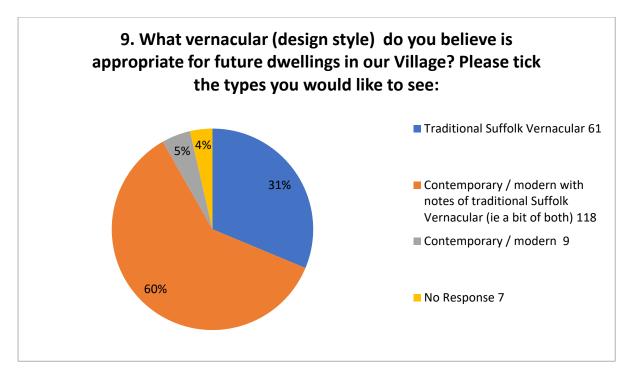


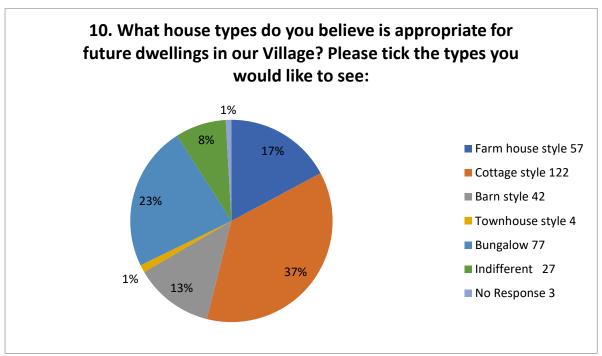


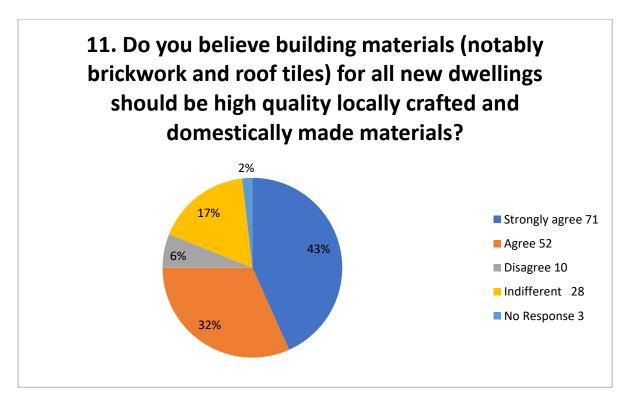


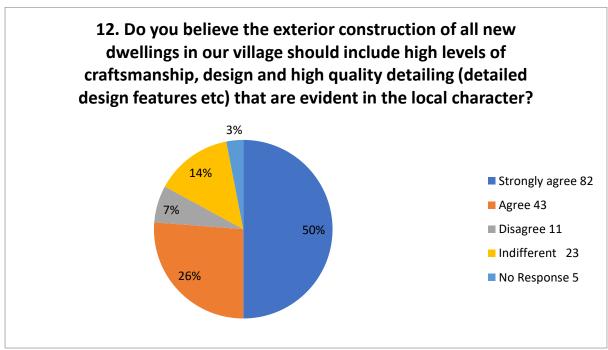


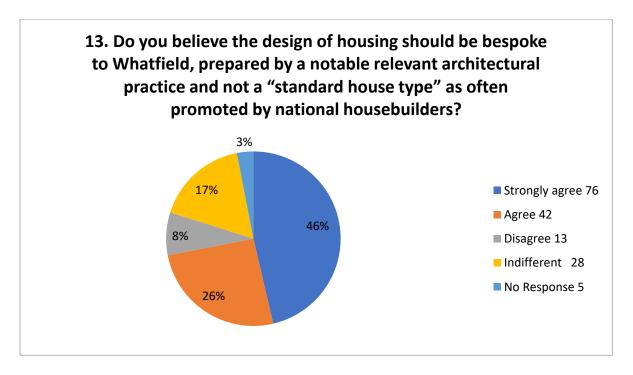


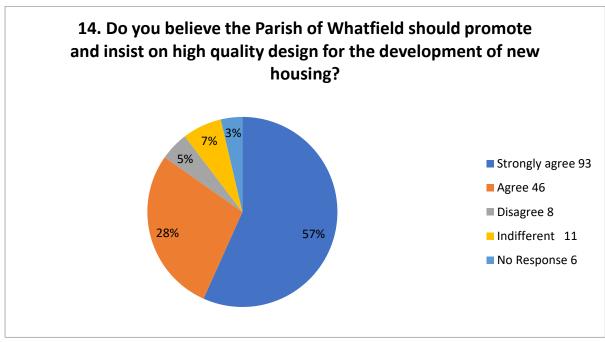


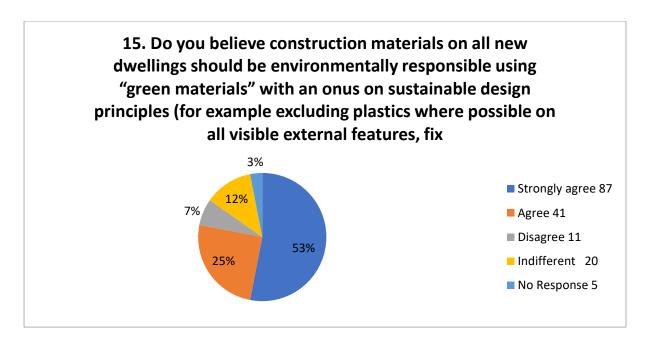


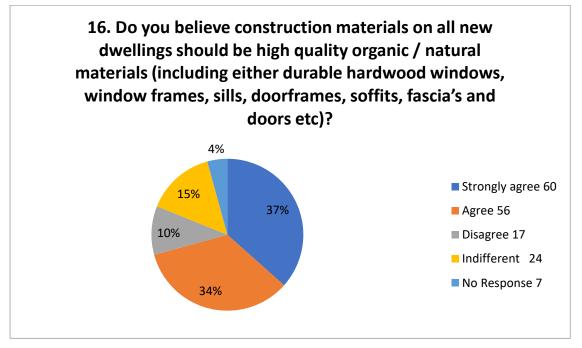


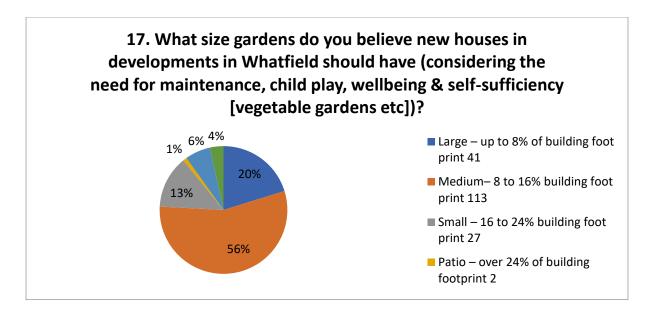


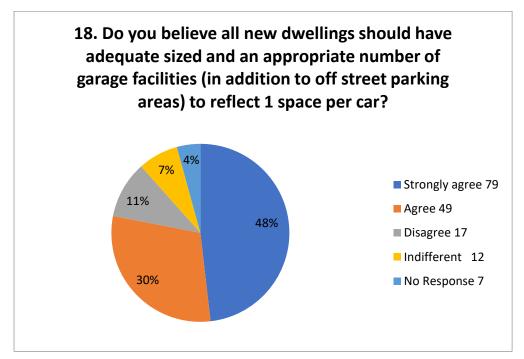


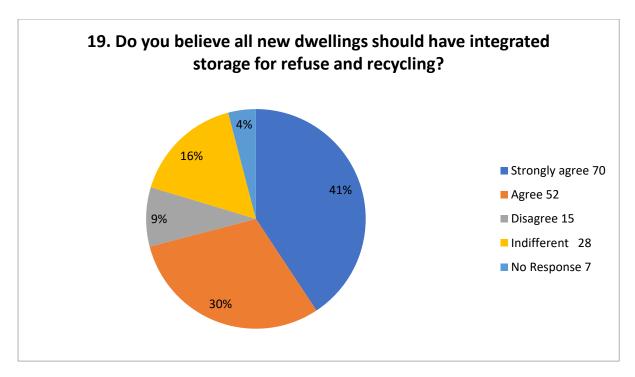


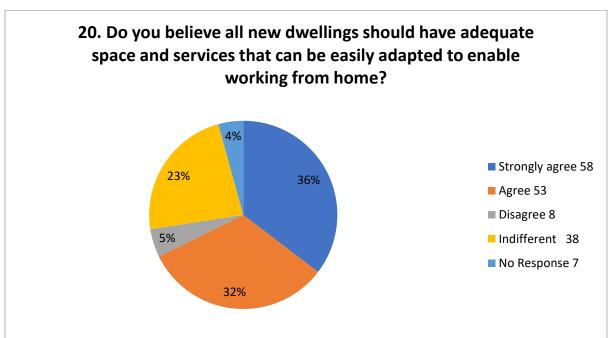


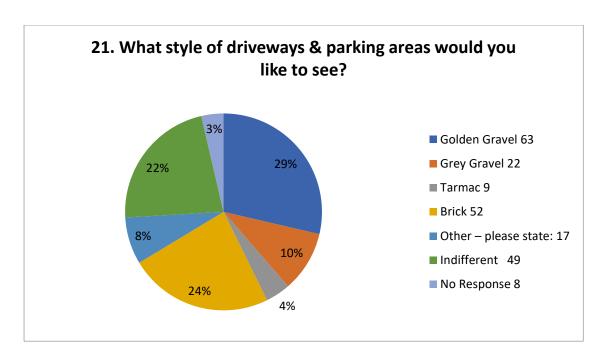


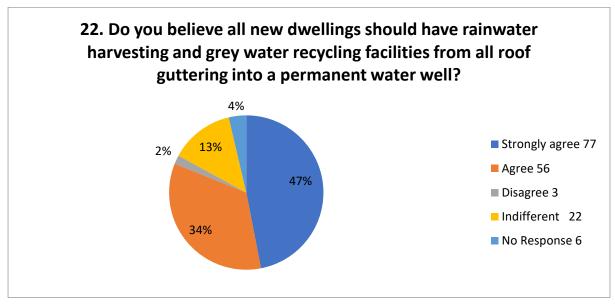


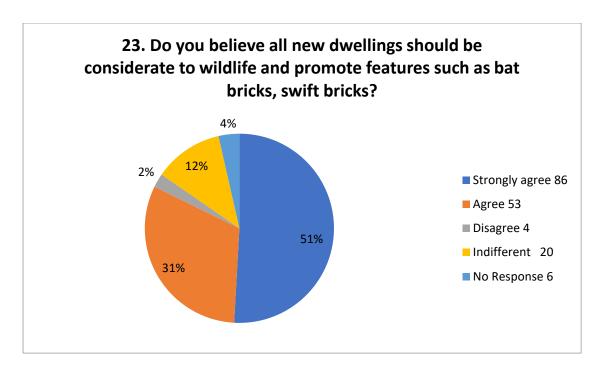


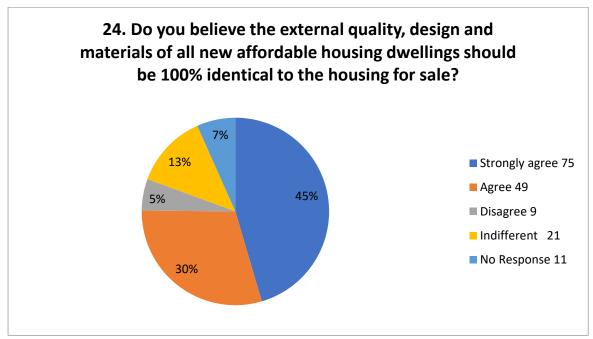


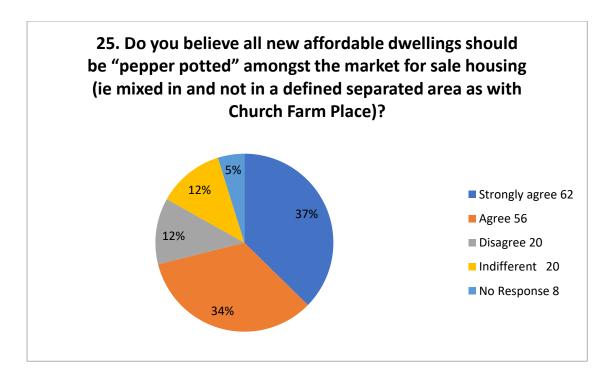


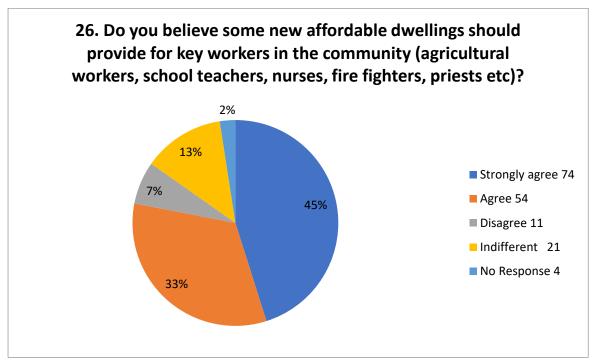


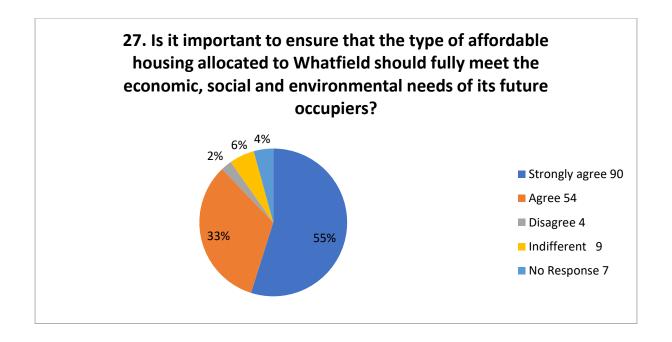












Appendix G – Results of Informal Consultation March-May 2020

Paragraph or Policy Number	Respondent	Response	Amendment to Plan required?
General	Vicki Walker	Thank you very much for all the time that has gone into this thoughtful and comprehensive plan. We are broadly in agreement with the plans set out. In particular, we agree that Whatfield's appeal is in its rural, small identity and would want to preserve this at all costs. It was in fact, what led us to choose Whatfield as the perfect small and friendly community to bring up our family when we decided to move here last year. We are also keen for the rural landscape, the walks and footpaths to be protected. Since we moved in, we have had ducks, ducklings, deer, rabbits and a magnificent array of birds. We would be concerned about any development that threatened this. We were also pleased to see mention of the traffic and the need to be mindful of how any additional housing might impact on this. The Street is much busier than we were expecting and the speeds of some vehicles is a huge concernas is the number of HGV vehicles. In addition, the lack of pavement along large sections of the street make this hazardous, especially with young children. Exiting and entering our drive can be problematic with the bottle neck that builds up as a result of the unavoidable number of parked cars. We would be very concerned about any development that added to the congestion in this area of Whatfield. To reiterate, what attracted us to this village is its unique character; alongside the beautiful small countryside setting there is a fantastic sense of community. We feel that development beyond the odd dwelling over the time period set out in the neighbourhood plan would alter this irretrievably. Thank you again for you time and the clarity of the process.	Support noted. No change to Plan
General	Nigel & Rebeca McVittie	Happy what you have said so no more comments from me.	Support noted. No change to Plan

General	George Ashford	I had a read and thought it was very well prepared and represented the views I have heard very well.	Support noted. No change to Plan
General	Kirsten	Thank you to everyone who has worked extremely hard to put this together. I am in	Support noted.
General	Mackenzie	full support of this document and its contents.	No change to Plan
General	Amanda Cross	I must say that I thought the plan was a very comprehensive document. I agree with the outline and fully support it.	Support welcomed. No change to Plan
General	Jane Appleby	I think this is great. I full support this proposal.	Support welcomed. No change to Plan
General	Mike Appleby	I am very supportive of the Whatfield Neighbourhood Plan and in particular I think the following aspects are key to Whatfield Residents. (See detailed comments set out below)	No change to Plan
General	Chris and Diane Armour	Sorry not done this before, overlooked due to attachment access prob!now got it & skimmed thro 71 pages! All good stuff tho somewhat wordy & repetitive. Our opinions are on the many pie-charts. Sorry late, but Jon D reminded me about it!all I can do in in the timecannot send to Whatfield email as requesteddoesn't want to know, hence to you Ann!! Can't think anything has been omittedwas parking in middle part of the Street mentioned??need for a layby at the letter box bungalows for residents opposite!!	Comments noted and support welcomed. The issue of the layby is not a Neighbourhood Plan issue.
General	Lee Walker	Many thanks for sending through this plan. My wife has sent a response already, but I wanted to add a few points. I am hugely impressed by the work that has gone into producing the plan, and the time and effort expended. I really appreciate what has been done on behalf of our whole community. I would like to add that the building of any additional houses in or around Whatfield will present a number of significant concerns. The first is the increase in traffic any new developments would cause. The Street is already very busy with cars, lorries and vans throughout the day, but particularly at peak times. There are parts of the road where there is no footpath, and this is very dangerous for the many families who have to use the road to access the school or other amenities. This is exacerbated given the main road is seen as a key access road between Hadleigh and Wattisham – and many of the	Support noted. No change to Plan

General	Patricia Whittle	I have seen and read the Neighbourhood plan. I did relay my comment to Roy and Ann which was that I was surprised that the field behind the old pub in The Street is not marked as building land when there has been outline planning on this site for some time. If there is to be building in the village this would, in my opinion, be the best site.	The site does not currently have the benefit of planning permission. The Plan will include a policy that sets out the criteria for site selection
		road users appear to exceed the speed limit. There must be serious consideration as to whether any new property is needed, given this dangerous situation. Additionally, the village has a particular charm and 'feel'. The Plan has clearly taken this into consideration most carefully. I am concerned that any further property development above and beyond that outlined in the plan would have a negative effect on the 'feel' of this village. This is particularly the case because there are no shops. I like the fact that we exist as a village without the need for a shop, garage or other similar facility – and thus we boost the local economy in Hadleigh. Further development beyond what is outlined in the plan here would jeopardise that balance. I was attracted to the village because of the proximity to fields and nature. This is an incredibly important aspect of our life here – an essential resource for our well-being and for our own and our children's' education. Development beyond the scope of that outline in the Plan would affect our access to this, and this would have a huge knock-on impact in the community. Any housing development must be carefully considered, so that the current feeling of openness between houses and in the village is maintained. I feel that the Plan as it exists does this, but any extra provision of housing would compromise this aspect of the village. We moved in last year, and whilst we were house hunting, agents in Hadleigh told us that houses in Whatfield tend to remain on the market for some time. Their view was that this is because the lack of amenities, families preferred other places to live. Two of the houses we looked at had been on the market for many months – one of them was Church Farm Place which has recently sold. This begs the question as to whether more new houses are needed here at all. For these additional reasons, I am happy to support the Plan as it stands. I am against any further development beyond the plan, though, for the reasons I outline above.	

General	Ann and	General comments, Pie charts. We feel that we do need some form of charts to show	but will not allocate a specific site. Agree that pie charts may
General	Roy Searl	the percentages., which we feel makes it easy to read. Another option on the charts is Bar charts but personally we prefer the Pie charts. We did ask another member of the Parish Council who was happy with the plan layout as it stands	provide a clearer representation and these can be added.
Page 7 Para 1.12	Jon Durant	Warmest congratulations are due to the working Group which has laboured long and hard to produce a document which gives a reasoned and coherent account of how most of the inhabitants of Whatfield see their village and how it might develop in the future. I agree wholeheartedly with the fundamental aim to deliver "an enduring environmental, affordable and high quality built legacy for our future generations" (1.12) and wonder whether this might be expanded a little so that potential developers would see that the village is not opposed to new building per se. The fact that small, even possibly single, housing developments do not have the profit potential of fields full of houses might be unfortunate for some but should not leave the village open to opportunistic and unsuitable development. I say this as a resident (since 1972) of Wheatfields, the type of development which would now be strenuously resisted on the grounds that it fails to meet most of the criteria in the Draft Plan! Gill agrees with the comments and says the sentences, particularly in the last two paragraphs, are too long!	The plan text refers to the results of the questionnaire which indicates some support for new development within the village. (page 23 para 4,11). The plan will also contain a new policy that will set out the criteria for appropriate development sites.
Page 8 Paras 2.3 and 2.4	Jon Durant	Without wanting to tread on David's toes I would respectfully propose a few slight adjustments to paras 2.3 and 2.4. Eilert Ekwall (Concise Oxford Dictionary of English Place Names 4th edn. 1960) gives the earliest forms of the village name as 'Watefelda' (Domesday Book 1086) and 'Whatefeld' (Feet of Fines 1205) both meaning a 'wheat growing place in cleared land'. The form 'Quatefelda' suggested by Skeate (Place Names of Suffolk 1913) is strange because in Old English there is no Qu. The 'qu' sound - as in, for example quern - is written cw in Old English (cwern). Without access to the book I can't check his reference but cw is some way away from the beginning of hwate (Old English, wheat) so I wonder whether there is a reliable source for Quatefelda, or if it is a scribal error, probably made by a Norman French speaking writer.	Agree to make the suggested amendments to the plan as follows: Para 2.3 Fourth Line change from 'The village was then known as Quatefelda' to 'The village was then known as Watefelda'. Para 2.4 'As Languages evolved there were several alterations

		When the Danes invaded Britain in the ninth century they were eventually defeated by Alfred the Great (878) and confined to the area of land roughly to the North and East of Watling Street which came to be called the Danelaw. Originally meaning the land where Danish law prevailed the term was used to define the land itself by the 11th century. The Danelaw was reconquered by the West Saxon descendants of Alfred in the 10th century, then under Cnut it, with the rest of England, fell under Danish rule again. I know of no Danish place names round here and think that, in practical terms, it made no difference to the folk of Whatfield who was in charge or whose law was or wasn't followed - they paid taxes all the same! Here endeth the waffle about early mediaeval history.	of Whatfield spelling becoming Watefelda'
Page 13	Anne and Gareth Edwards	The plan looks good. The only thing that stuck out for us was page 13, "a range of housing in Whatfield" with 3 pictures of houses each in excess of £500,000. These pictures create the impression of a highly affluent village and do not reflect the range of houses here (i.e. Wheatfield and the houses along the middle section of the Street should also be included).	Accept the point. Additional photos to be included in the next version of the plan.
Page 22	Paul Mackenzie	Having read the village plan, which is a great piece of work thank you to all involved, I support the findings to protect the village and provide the necessary demand for homes in the village. I note that the consultation period on page 22 needs amending.	Comments noted. Consultation dates for REG14 will require updating throughout the plan including page 22
Page 23 Para 4.11	Jon Durant	Assuming that the volume of traffic passing through the village eventually returns to something like pre Covid-19 levels the questions of footways and traffic speed rightly identified as key issues (4.11) really need to be addressed before there is any more development at either end of the village. Is it possible to write into the Plan that any future development must be conditional on these matters being dealt with effectively rather than just talked about?	One of the reasons for refusal for the two recent applications at Naughton Road and Wheatfields was on the basis of a lack of footways. This was also one of the reasons cited for the dismissal of the appeal at Naughton Road. The plan will include a new policy which will cover the criteria for an

			acceptable development which can refer to this issue. However the creation of a footway through the village would be problematic without the need to take into account that this would either involve the purchasing of the land at the front of some of the properties in The Street or by making the road narrower, which in due course would add to the problems of traffic in The Street.
Page 25	Jon Durant	I fully agree with Objectives 1 to 5 and the Policies you have carefully produced to meet them.	Comments noted. No change to Plan
Page 31 WHAT.1	Mike Appleby	Retaining fields at the margin of the village: to stop the village becoming a sprawling, un-delineated entity, we should be favouring new development within the existing village instead of building on greenfield sites at the ends of the village.	Agree – Policy WHAT1 seeks to protect the village edges and the landscape setting of the village
Page 34 Para 7.5	Jon Durant	Para. 7.5 notes that there has been no proportionate increase in village facilities to match the numbers of houses built since 2015. The same applies at a wider level; doctors' surgeries, dentists and so on are overstretched. While this is not primarily a matter for a Village Plan is there any place in it where such concerns can be raised? How do section 106 agreements with the builders of, for example, Church Farm Place, relate to facilities in Hadleigh?	Agree this can be usefully re-worded along the lines of: "remove the word 'proportionate' so that the statement will then

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			read 'There has been no increase"
Page 37 Para 7.16	Mike Appleby	Scale: there has already been a considerable increase in new houses in Whatfield over the past decade and any further additions need to be of a size that does not dwarf the existing Village. I feel 10% per decade of additional houses (approximately 13 houses per decade) is an upper limit to the number of new houses we can accommodate before the fabric of the village, and existing infrastructure are put at serious risk making additional new housing development totally unwelcome. Applications to build 10 or more houses should be dismissed on the grounds of scale alone.	Comments noted. Refer to questionnaire results which indicated some appetite for up to 8 during the plan period.
Page 52 WHAT.4	Mike Appleby	Quality: the style, density and materials are very important to ensure any new housing development is welcomed by the existing people who live in Whatfield. An all too common, one dimensional objective to maximise developers profit margins (by increasing density, using cheapest available materials and a lack of architectural detailing) will damage the Village. Instead, a smaller number of higher quality, lower density houses is what is required.	Agree quality is an important element – Policy WHAT4 seeks to raise standards.

Appendix H – List of Consultees for REG 14 Consultation

MP for South Suffolk	
MP for Suffolk Coastal	
MP for Ipswich	
County Cllr to Cosford Division	Suffolk County Council
Ward Cllr to North West Cosford	BDC
Ward Cllr to South East Cosford	BDC
Ward Cllr to Hadleigh North	BDC
Parish Clerk to	Elmsett
Parish Clerk to	Nedging with Naughton
Parish Clerk to	Kersey
Parish Clerk to	Aldham
Parish Clerk to	Semer
Parish Clerk to	Hadleigh
BMSDC Community Planning	Babergh & Mid Suffolk DC
SCC Neighbourhood Planning	Suffolk County Council
Transport Policy	Suffolk County Council
Planning Obligations Manager	Suffolk County Council
HR Manager - SOR, Children and Young People	Suffolk County Council
Planning Policy Team	South Norfolk Council
Neighbourhood Planning Team/Planning Policy Team	West Suffolk Council
Planning Policy Team	East Suffolk Council
	The Coal Authority
Area Manager, Norfolk & Suffolk Team	Homes & Communities Agency (HCA)
Land Use Operations	Natural England

Essex, Norfolk & Suffolk Sustainable Places Team	Environment Agency
East of England Office	Historic England
East of England Office	National Trust
Town Planning Team	Network Rail Infrastructure Limited
	Highways England
Stakeholders & Networks Officer	Marine Management Organisation
	Vodafone and O2 - EMF Enquiries
Corporate and Financial Affairs Department	EE
	Three
Estates Planning Support Officer	Ipswich & East Suffolk CCG & West Suffolk CCG
	Transco - National Grid
Consultant	Wood Plc (obo National Grid)
Infrastructure Planner	UK Power Networks
Strategic and Spatial Planning Manager	Anglian Water
	Essex & Suffolk Water
	National Federation of
	Gypsy Liaison Groups Norfolk & Suffolk Gypsy
	Roma & Traveller Service
	Diocese of St
	Edmundsbury & Ipswich
Chief Executive	Suffolk Chamber of Commerce
Senior Growing Places Fund Co- ordinator	New Anglia LEP
Strategy Manager	New Anglia LEP
Conservation Officer	RSPB
Senior Planning Manager	Sport England (East)
	Suffolk Constabulary
Senior Conservation Adviser	Suffolk Wildlife Trust

Director	Suffolk Preservation Society
	Suffolk Coalition of Disabled People
	Suffolk Preservation Society
	Landowners; owners of NDH and LGS
Community Development Officer – Rural Affordable Housing	Community Action Suffolk
Senior Manager Community Engagement	Community Action Suffolk

Appendix I – REG14 Response Table

Serial	Paragraph or Policy Number	Respondent	Response	(Suggested) Working Group Response	Action
1	General	Anglian Water	It is noted that the Neighbourhood Plan includes a number of criteria based policies which are intended to be used in the determination of planning applications within the Parish but does not identify any specific sites. These do not appear to raise any issues of relevance to Anglian Water.	Comments noted.	No change to Plan
			The adopted Babergh Local Plan and emerging joint local plan includes district wide policies relating to managing the risk of flooding and surface water management including the provision of Sustainable Drainage Systems in the district. As the Development Plan is intended to be read as a whole it is not considered necessary to include similar policies in the Neighbourhood Plan. Therefore we have no comments to make relating to the Draft Neighbourhood Plan.		
2	General	Kersey Parish Council	Kersey Parish Council discussed the Whatfield Neighbourhood Plan at their meeting on 7 September 2020. The Parish Council believes it is a well, considered detailed and developed plan. It is a good example of community involvement and the Council wishes Whatfield success with the implementation	Comments welcomed	No change to Plan
3	General	Natural England	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.	Comments noted. NE has also been consulted on the SEA and HRA Screening Reports which indicate that the Whatfield Neighbourhood Plan is	No change to Plan

			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 is not able to fully assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes or, provide detailed advice on the application. If you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require advice. The lack of detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process. Generic	screened out from further SEA and HRA work on the basis that no specific allocations for housing are being made. It is therefore anticipated that there will be no likely effects on protected sites that NE would be concerned with.	
4	General	National Grid	advice is provided in the Annex attached. 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	Comments noted	No change to Plan

			I		1
			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/		
5	General	Ipswich and	Thank you for communicating with Ipswich and East Suffolk	Comments noted	No change to
		East Suffolk	Clinical Commissioning Group (CCG) regarding Whatfield Parish		Plan
		CCG	Council's proposal to create a Neighbourhood Plan (NP). The		
			CCG recognises that the Parish of Whatfield does not have a		
			primary healthcare facility actually inside the parish but do		
			have healthcare facilities nearby in Hadleigh which residents of		
			Whatfield predominantly use and Bildeston less predominantly.		
			The Neighbourhood Plan indicates that the proposed number		
			of dwellings over the time period of the plan to be significantly		
			low as to have minimal impact on the primary care in the area		
			and would therefore be unlikely to request developer		
			contributions. The plan makes mention of key worker housing		
			and the residents of Whatfield to support this is encouraging as		
			the CCG along with our NHS colleagues are currently looking at		
L	1	1			1

			key worker housing in Suffolk. It is encouraging to see very little mention of primary care in the plan which usually indicates that residents are satisfied with the service. The overall plan looks to protect green spaces and promote healthy lifestyles, which is great to see. Promoting healthy lifestyles and protecting green spaces is good for both mental and physical health and the CCG supports this being in the plan. Ipswich and East Suffolk CCG would welcome the opportunity to discuss with the Parish Council any issues currently or in the future around health care provision in Whatfield.		
6	General	Historic England	We welcome the production of this neighbourhood plan, but regrettably do not currently have capacity to provide detailed comments. We would refer you to our detailed guidance on successfully incorporating historic environment considerations into your plan, which can be found here: ">historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/> . For further advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Suffolk County Council. There is also helpful guidance on a number of topics related to the production of neighbourhood plans and their evidence base available on Locality's website: https://neighbourhoodplanning.org/ , which you may find helpful. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.	Comments noted	No change to Plan

7	General	Lee Walker	Good to see such a comprehensive document. I like the clarity and the logical thought processes represented. Pleasing to see the level of consultation	Support welcomed	No change to Plan
8	General	Lee Walker	I am very pleased to see numerous references to congestion, parking on The Street, speeding and the lack of pavements. This must be a key feature restricting future development in Whatfield. Safety of residents and visitors has to be a priority.	Comments noted. See also comments made by SCC in terms of WHAT6	No change to Plan
9	General	Vicki Walker	I am very grateful for all the time and consideration that has gone into this plan and it is clear that there is a real desire to maintain the physical and demographic appeal of Whatfield. My only concerns are that some of the issues should be given greater priority and there seems to be some inconsistencies	Comments noted. These are explored below in the more detailed comments submitted by this respondent against the appropriate part of the plan	No change to Plan
10	General	Suffolk Wildlife Trust	Whilst we welcome the protection offered to biodiversity within the Whatfield Neighbourhood Plan, we recommend some modifications to ensure that future development within the parish does not have a negative impact. These changes will ensure the plan meets its biodiversity obligations as set out within the National Planning Policy Framework (NPPF) and the Government's emerging Environmental Bill.	Comments noted. Specific comments are addressed below	No change to Plan
11	General	Suffolk County Council	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.	Support welcomed	No change to Plan
12	General	Lawson Planning Partnership on behalf of M Chisnall and Sons	We write on behalf of M Chisnall & Sons who control Vacant Land North of The Street in Whatfield, which is suitable and available for housing, and OBJECT to the draft Whatfield Neighbourhood Development Plan (DWNDP) for the following reasons. 2. The housing and built environment strategy of the DWNDP is not considered to meet the requirements of Paragraph 8,	Comments noted. However the NDP as currently drafted is considered to meet the basic conditions and is in conformity with the emerging Joint Local Plan 2019 and the PreSubmission Version of the JLP	No change to Plan

Schedule 4B of the 1990 Town & Country Planning Act - as it fails to meet 'Basic Conditions' for preparing a Neighbourhood Plan for the following reasons;

NATIONAL POLICIES & ADVICE – the DWNDP is deficient in its approach as it does not have sufficient regard to national policies & advice contained in guidance for plan making issued by the Secretary of State;

SUSTAINABLE DEVELOPMENT – the housing & built environment strategy would not contribute to the achievement of sustainable development in Whatfield;

DEVELOPMENT PLAN STRATEGIC POLICIES – the DWNDP is not in general conformity with strategic policies in the Babergh & Mid Suffolk Joint Local Plan Preferred Options Consultation Document July 2019;

VACANT LAND NORTH OF THE STREET – is omitted from the housing & built environment strategy for no valid reason & ought to be included as an allocation;

2020 (see also Babergh DC and SCC representations which raise no issues of conformity or conflict with either national policies and advice or the strategic policies of the area)

The NDP is not obliged to make any housing allocations and the reasons why there are no specific allocations proposed are set out at para 7.22.

Neighbourhood Plans should not promote less development than is set out in the strategic policies for the area or undermine them (NPPF para 29). The Neighbourhood Plan contains Policy WHAT4 which is a positive policy that specifically provides guidance for new housing development.

The emerging Joint Local Plan (November 2020) indicates a figure of 1 dwelling as the total homes requirement up to 2036. It also refers to a single dwelling that has not been completed at the base date of the 1st April 2018. It is therefore considered that the draft NDP does meet the basic conditions.

13	General	Babergh District Council	You refer throughout to the emerging Babergh & Mid Suffolk Joint Local Plan and, for the most part use acronym 'BMSJLP'. That is acceptable although you see we use 'Draft JLP' in our published document. At paragraph 7.7 you use the shorter 'JLP'. For consistency, please use one abbreviation throughout. You should also bear in mind that a next iteration of the Joint Local Plan may be in the public domain by the time this Neighbourhood Plan (NP) reaches submission stage. Should that be the case, the addition of a date reference (July 2019) or (Xxx 2020) might be appropriate. A reminder also that while there is no legal requirement to examine this NP against emerging policy, Planning Practice Guidance advises us that the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which this NP is tested and, that	Comments noted. One acronym to refer to the Emerging Joint Local Plan and the date of the most up to date version will be used. Comments noted.	Single acronym of BMSJLP to be used together with latest version date.
14	Preface	Babergh District Council	conformity with emerging plans can extend the life of NPs, providing this does not result in conflict with adopted policies. The Preface will need updating to remain relevant. We suggest also that the first paragraph simply read: "The Whatfield Neighbourhood Development Plan has been prepared by the Whatfield Neighbourhood Plan Working Group", and perhaps leave introducing the 'WNDP' and 'NPWG' acronyms for Section 1.	Agree this will require updating for the REG16 version	Amend plan accordingly.
15	Para 1.1 and 1.2	Babergh District Council	Suggest these two paragraphs could be merged as they relate to the same subject. If done, a reminder to update subsequent paragraph numbers.	Agree these can be merged	Merge paragraph 1.1 and 1.2 and update subsequent para numbers

16	Para 1.7	Babergh District Council	It might be easier to show the various stages in a table or flow-chart. A reminder also that the consultation undertaken by the District Council must be for a minimum period of six-weeks but, like this Reg 14 consultation, may need to take place over a longer time period to account for public holidays etc. Last sentence, 'receives' not 'received'. The referendum has not taken place yet!	Agree. A diagram has been devised to show this more clearly. Amend wording accordingly.	Insert diagram at para 1.7
17	Para 2.1	Babergh District Council	Whatfield is in Babergh, not in Mid Suffolk.	Noted. Error to be corrected	Replace Mid Suffolk with Babergh in Para 2.1
18	Paras 2.2 to 2.9	Suffolk County Council	SCC welcomes the mentions of archaeological history in paragraphs 2.2 – 2.9. It is suggested that the following statement could be included to make it clear to developers where to access archaeological information: "Further information on the archaeology of the parish can be found through the Suffolk Heritage Explorer, https://heritage.suffolk.gov.uk/" The south facing aspects over the Brett valley would likely have been topographically favourable for earlier settlement activity, meaning development in these areas may require archaeological investigation before development can take place.	Comments noted. Agree to include additional wording	Amend paragraph wording to include reference to where to access information
19	Para 2.18	Suffolk County Council	Health and Wellbeing The population figures provided in section 2.18 are comprehensive and can be updated using the 2019 ONS midyear estimates, available from the Suffolk Observatory1: 380 total population, 198 males (52%), 182 (48%). The population aged 65 or over is 94 people (25%).	Comments noted.	Figures in para 2.18 to be updated
20	Para 2.21	Vicki Walker	In 2.21, the socio-economic profile is very interesting and I feel should lead the type of housing that is planned. The fact that	One of the objectives of the plan is to provide for the housing that	No change to Plan

			the emphasis is on 'Country Living' and 'Rural Reality' suggests that housing must be built that appeals to this group. If the identity changes through too much or poorly judged development it will alienate some villagers and may lead to them moving on.	meets the existing and future needs of the village. To achieve this a range of types of housing needs to be planned for. There is support in the questionnaire results for a range of types of housing – size and tenure - and it is important that it is not just larger housing that is provided. Policy WHAT6 has a specific emphasis on design quality which will guide the determination of future applications.	
21	Para 2.23	Suffolk County Council	Education The catchment schools for Whatfield are Whatfield CEVCP School and Hadleigh High School. At the moment, Whatfield CEVCP is forecast to have one surplus place by 2024/25 based on 95% capacity but Hadleigh High School is forecast to be over subscribed. However, it is unlikely this neighbourhood plan will have a significant impact on the capacities of the catchment schools	Comments noted.	No change to Plan
22	Para 2.27, Page 15	Suffolk Wildlife Trust	Whilst we are pleased that Calves Wood County Wildlife Site is named, we also believe that the two other County Wildlife Sites within the Parish, Whatfield Meadow and Hill Farm Meadow, should also be named as they are non-statutory designation sites recognised within the National Planning Policy Framework as 'Locally Designated Sites'.	Noted. Agree that the other two CWS should be named for completeness.	Amend para 2.27 to include additional CWS
23	Page 15, Paragraph 2.28	Suffolk Wildlife Trust	Buckles Meadow is mentioned as a County Wildlife Site, we believe that the site is called Whatfield Meadow County Wildlife Site, as labelled with in the County Wildlife Site Citation.	Comments noted	Plan to be updated accordingly

24	Para 2.34	Babergh District Council	It might be beneficial to include a map that shows the named footpaths.	Comments noted. Agree to include Map	Insert footpaths map.
25	Para 3.3	Babergh District Council	We suggest a re-write of para 3.3: "The statutory development plan for the area currently comprises the Babergh Local Plan (adopted in 2014) and the 'saved policies' of the 2006 Babergh Local Plan. In 2015, Babergh District Council announced its intention to produce a new Joint Local Plan with Mid Suffolk District Council [the BMSJLP]*. This will provide a planning framework for the management of growth across both districts up until 2036. A 'Preferred Options' document was published for consultation in July 2019 and a revised version of the Plan is expected in late 2020. However, it is unlikely that the Joint Local Plan will be completed and adopted before the Neighbourhood Plan." We also advise keeping this text under review and that it be updated to reflect the very latest Joint Local Plan position. * Noting our comment about one standard acronym for the Joint Local Plan.	Agree to use the suggested wording	Amend para 3.3 accordingly.
26	Para 3.6	Babergh District Council	Reference is made to a Functional Clusters Study from 2017. Please note that: 1. this study only related to Mid Suffolk, so is not relevant in this case, and 2. the concept of functional clusters is not taken forward in the Joint Local Plan. The functional cluster approach did form part of the thinking behind the 2014 Babergh Local Plan. If you wish to retain mention of this, para 3.6 will need some heavy editing and, chronologically, the text will sit better before para 3.4	Comments noted. Reference to functional clusters to be removed for clarity	Delete para 3.6
27	Pages 21- 22	Babergh District Council	If your Consultation Statement is going to set out in detail the stages gone through in preparing this Plan, is there an	Agree that this can be streamlined and the main detail	Amend this section accordingly

			opportunity to show these in a more streamlined fashioned here?	to be included in the Consultation Statement	
28	Objective 4 -and Page 55	Babergh District Council	Suggest that the word 'quality' only be used the once: "Objective 4: To improve the quality of the design and construction of new development in Whatfield through the implementation of the Whatfield Design Guide."	Agree to amend wording	Remove second "quality" from objective
29	Chapter 6.1	Babergh District Council	Not a comment on the Plan as such but is there a reason why the section of the Plan that covers 'Community & Amenity' is badged as Chapter 6.1, while the section that covers 'Housing & the Built Environment' has a whole Chapter to itself	Agree this could benefit from restructuring	Amend Chapter headings accordingly
30	Para 6.1.8 WHAT1 Map A and Policies Map AILLQ	Babergh District Council	We have no specific objection to the retention of the area currently identified at the district level as a 'Special Landscape Area' through this Neighbourhood Plan. The evidence and justification for this should be appropriate and robust. We see this local re-designation as a common theme running through many NPs. (See for example policy EMST7 and supporting text in the Elmsett NP). To be consistent you might want to also adopt the term 'Area of Local Landscape Sensitivity' (ALLS) rather than 'Area of Important Local Landscape Quality' (AILLQ). If done, para 6.1.8 etc. will need to be amended accordingly.	Agree, in order to be consistent with other NPs the designation can be renamed	Refer to ALLS rather than AILLQ
31	Para 6.1.9 WHAT1 Maps B and C and Policies Map	Babergh District Council	Suggest bullets as follows after first sentence, but see also our important note further below re County Wildlife Sites: • Calves Wood: A County Wildlife Site and Ancient Woodland in the north of the parish, • Buckle's Meadow: A County Wildlife Site located off Rectory Road, • Hunty's Vale: A site under conservation management, and • The Drift: on Rectory Road. An area managed by the landowner for the benefit of wildlife.	Comments noted. See also response from Suffolk Wildlife Trust in respect of CWS. However the Emerging JLP November 2020 refers in para 15.13 to County Wildlife Sites in the list comprising designated sites in Babergh and Mid Suffolk.	Policy WHAT1 to be recast to include non CWS sites only.

			We note also that only two of these sites are illustrated with photographs at the bottom of page 31. An early working draft version of this Plan suggested that all four sites would be illustrated. Is that no longer the case? Policy WHAT 1 identifies all four sites as worthy of protection under the 'Natural Features' sub-heading but only three appear to be shown collectively across Maps B and C, and the Policies Map: Calves Wood, Buckles Meadow and Hunty's Vale. The above said, there is a separate and potentially awkward issue relevant to County Wildlife Sites which may impact on this part of the Plan. It is currently understood that Babergh & Mid Suffolk District Councils' do not have permission from Suffolk Biological Information Service (SBIS) to publish any map(s) which specifically identify County Wildlife Sites. Given that plan policies should help promote net biodiversity gain, this does seem a somewhat bizarre situation. Nevertheless, the NPWG are strongly advised to make their own enquiries with SBIS on this matter and, if necessary, amend the Plan accordingly.	Policy LP18 of the JLP November 2020 includes protection for designated sites which includes CWS. The WNDP therefore does not need to repeat this protection and therefore Policy WHAT1 will focus on the sites that are locally important but do not currently benefit from any protection.	
32	Page 31. Para 6.1.9	Suffolk Wildlife Trust	As there is also Hill Farm Meadow County Wildlife Site within the parish, then there are actually five sites identified for their contribution to wildlife, not four as stated. Hill Farm Meadow County Wildlife Site is along Semer Road. Please also see comments regarding the name of Buckles Meadow County Wildlife Site	Comments noted. Agree all CWS should be referred to in the text. However the purpose of this policy was to protect undesignated sites that were considered locally to be important for wildlife. CWS are protected under Policy LP18 of the emerging JLP 2020 and in the adopted Babergh Local Plan so it is not considered necessary to include the CWS in Policy WHAT1	Remove CWS sites from Policy WHAT1 but add reference to all CWS in the text.

33	WHAT1 – Landscape Setting and Natural Features	Vicki Walker	The countryside around this area is breath taking and development could detract from the 'hinterland' identity. I am concerned that there is (no) mention to protect specific vantage points in the village whereas I feel that any current green space should be protected as this will preserve the rural, open feel of the village and compensate for the busy road through the village. We also have such a variety of wildlife here in Whatfield and so maintaining expanses of green space is vital to protect and encourage more — especially because the community value this so highly in their feedback.	The Plan does identify specific Green spaces for protection under Policy WHAT3. Policy WHAT1 also specifically identifies two specific views to be protected. The term 'green space' may be being used by the respondent to refer to areas of countryside surrounding or on the edge of the settlement rather than within the Built Up Area, such area are not within the criteria of the LGS as set out in NPPF para 100.	No change to Plan.
34	WHAT1 — Landscape and Natural Features	Suffolk Wildlife Trust	The policy states that development proposals will 'where practical to do so, provide a net gain in biodiversity'. As the National Planning Policy Framework (NPPF, 2019) Chapter 15 States, planning policy should minimise impacts and provide net gains for biodiversity. Therefore, all development should seek this, not just 'where it is practical to do so'. All future development proposals should apply the mitigation hierarchy to help deliver biodiversity net gain and reduce, as far as possible, negative effects on biodiversity. The mitigation hierarchy requires that in the first instance impacts are avoided, if they cannot be avoided then they should be mitigated for and only as a last resort should impacts be compensated. Enhancement and delivery of biodiversity net gain i.e. an approach that leaves biodiversity in a better state than before should be part of all development proposals, in line with the Government's emerging Environment Act predicted to receive Royal Assent in 2021. This should therefore be referenced within this policy to help deliver policy WHAT1's	Agree this part of the policy could be reworded for clarity See also SCC response below	Amend Policy wording

			objectives of ensuring that future development will not have a		
			negative effect on the area's biodiversity and will deliver a		
			biodiversity net gain.		
			Ecological Networks and Wildlife Corridors should also be		
			included within this policy, to ensure that species and habitats		
			within the parish do not become isolated and fragmented by		
			development. In accordance with the NPPF, ecological		
			networks should be established to ensure that they are more		
			resilient to current and future pressures. Therefore, protecting		
			and enhancing these should be within this policy.		
			Please see our previous comments with regards to the need to		
			include Hill Farm Meadow County Wildlife Site within this		
			policy and on Map C. Please also see previous comments		
			regarding the name of Buckles Meadow County Wildlife Site.		
35	WHAT1 –	Suffolk	Natural Environment	Agree that photographs would	Amend plan
	Landscape	County	Policy WHAT1	assist here.	accordingly
	Setting and	Council	In regard to the two Important Views that are highlighted on	See also SWT suggestions above	
	Natural		Map B and in Policy WHAT1, there does not appear to be		
	Features		justification for why the view looking from the village towards		
			the south is important and worthy of protection. It is suggested		
			that the Neighbourhood Plan should include some background		
			evidence, for both views, such as any surveys or questionnaires		
			or analysis that were conducted, as well as the inclusion of		
			photographs to improve the effectiveness of policies protecting	Agree this wording	
			these views		
			There is good biodiversity wording in Policy WHAT1, however it		
			is recommended that this policy could be amended by		
			removing "and where practical to do so" as this would make		
			the policy for net gain stronger.		
			Therefore, the following more strongly worded amendment is		
			recommended to the Natural features section of Policy		
			WHAT1:		

36	WHAT1 – Landscape	Babergh District Council	"Development proposals will be expected to retain existing features of landscape and biodiversity value, where possible to do so (including ponds, trees, woodland, hedgerows and verges) and where practical to do so, providing a net gain in biodiversity through, for example:" Site d) 'The Drift on Rectory Road' does not appear to be displayed on Map C Natural Features. The other three sites have a justification for their protection (i.e. ancient woodland) however this site does not. It is recommended that this should be included to help improve the policy's effectiveness. Suggest referring to the " Neighbourhood Plan Area " to make it clear that it is the same area covered by this Plan. 'defined settlement boundary': It is here that we see first	Agree this section would benefit from clarity	Section to be reworded and reference to
			mention of the settlement boundary. It next appears in para 6.1.16, then para 7.18, para 7.22, in policy WHAT 4, and finally, in Appendix B. Nor is the settlement boundary specifically identified on any map. From the District Council's perspective, the most relevant settlement boundary is that shown in the emerging Joint Local Plan as this will replace the now out-of-date 2006 'Built-up Area Boundary'. Before policy WHAT 1, and perhaps in Chapter 3, we suggest it be made clear that the Whatfield NP is minded too adopt the settlement boundary defined in the Joint Local Plan.		the Settlement Boundary to be included at 3.6
37	WHAT 1 Important Views	Babergh District Council	A North / South view is identified but there is no requirement as to how to consider these in relation to planning decisions. It is suggested that you could add "conserve and enhance Important Views", or consider further how this NP would like them to be considered?	Agree this would benefit from clarity	Amend plan wording.
38	WHAT1 Natural Features	Babergh District Council	The penultimate paragraph, on loss or damage of natural features, only identifies replacement planting as a mitigation measure. Should it cover ponds as well?	Policy is to be reworded as a consequence of other representations; however this	Amend plan accordingly

40	Appendix B Page 35 and 37	District Council Suffolk County	Meadow and Hunty's Vale (page 40) to the end of the paragraph to avoid any doubt that these are not part of policy WHAT3 and the assessment table in Appendix B. There are two Map C - Natural Features on p35, and Village Facilities & Amenities on p37.	to be resolved. CWS to be removed from the Policy as they are protected under Policy LP18 of the Emerging JLP November 2020 See Rep 31 above Noted. Maps to be renumbered.	amended accordingly Amend Map numbering
41	Map c Page 37 WHAT2	Council Babergh District Council	Map C' on page 37 should read 'Map D' Beyond the questionnaire, is there any other evidence to justify the selection?	Noted. Maps to be renumbered	accordingly. Amend Map numbering accordingly
42	WHAT2	Suffolk County	We welcome the emphasis on retaining and creating community facilities. Availability of such spaces is key to	Agree to refer to co-location in respect of health promoting	Amend plan to include

43	WHAT2	Suffolk	Map D is referred to within two different Policies – WHAT2	Agree this is an error which	Amend plan
	and 3	County	(Protection of Existing Village Facilities and Amenities) and	requires correcting	accordingly
		Council	WHAT3 (Local Green Spaces), however this is not correct. Local		
	D 6.4.45	C tt-II	Green Spaces should be referred to as Map E.	Assessment descriptions	A I . I
44	Para 6.1.15	Suffolk	The mention of the presence of green spaces around developments and the benefits towards mental health, in	Agree to include additional	Amend plan
		County Council	paragraph 6.1.15, is very welcome. It is suggested that this	wording to refer to benefits of mental and physical health	accordingly
		Council	paragraph could also have mention to the improvements on	derived from access to green	
			physical health, that can be reached through accesses to	spaces. Reference to safe walking	
			pleasant green spaces, and their usage for walking, cycling, and	and cycling is covered in revised	
			other physical activities and exercise. It is encouraging to see	WHAT5.	
			the Whatfield Neighbourhood Plan encourages healthier		
			lifestyles through active travel for exercise and recreation, it		
			would be positive to see a specific principle around safe		
			walking and cycling included.		
45	WHAT1	Lee Walker	Please ensure that the views between green spaces are also	This site is the subject of another	No change to
	Landscape		preserved – for instance that between the Church and the	representation made by the	Plan
	and		Allotments. Development between these identified green	landowner who wishes to see the	
	Natural		spaces or in the vicinity must not be permitted.	site allocated for development.	
	Features			The area would not appear to	
	And			meet the criteria for LGS	
	WHAT3			designation in NPPF paragraph	
				100, specifically criterion b). There is a public footpath here	
				and there are long views from the	
				SW corner of the site across to	
				the church which could be	
				impacted by development of this	
				site. Criterion b) of Policy WHAT4	
				covers the issue of impact upon	
				the historic environment should	
				an application for development	
				come forward on this site.	

46	WHAT1 and WHAT3	Vicki Walker	I also think the areas around these green spaces should be protected. For example, any housing built near the church would affect the impact of this building and its position in the village. Views of the church are lovely from a range of vantage points in the village and these should be protected.	See above	No change to Plan
47	Para 6.1.15	Lee Walker	It is critical we protect our listed buildings, especially the church and the area around it which I am glad to see is designated protected green space. I am glad also the allotments are seen as vital green space. I would like it recognised in the NP that the views between these two green spaces should also be protected and free from development — otherwise the very character of the spaces themselves will be lost. It is made clear in the NP that the view up and down Hadleigh Road from Wheatfields should be protected. The view across from the church to allotments should also be protected.	It is not automatic that views between two existing green spaces should be protected. The area in question does not meet the criteria for LGS designation as set out in paragraph 100 of the NPPF; however there are long views of the church from the public footpath at the south west corner of the site which criterion b) of Policy WHAT4 would control should an application for development of the site come forward. The Neighbourhood Plan is not allocating specific sites for development.	No change to Plan
48	WHAT3 – Local Green Spaces	Suffolk County Council	Green Spaces and Facilities The provision of the designated Local Green Spaces in the Neighbourhood Plan is welcomed. There are proven links 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.	Support noted	No change to Plan
49	WHAT3 – Local	Suffolk County Council	Policy WHAT3	Agree the difference between the LGS and the space identified in WHAT1 needs clarifying as	Amend plan accordingly.

	Green		The four designated Local Green Spaces are welcomed by SCC,	suggested and as a consequence	
	Spaces		as this is in support of the ongoing work towards the Greenest	of other representations made in	
			County Initiative3.	respect of Policy WHAT1.	
			Paragraph 6.1.17 states that Buckles Meadows and Hunty's	Reference to Buckles Meadow	
			Vale are additional important spaces, but are not included in	and Hunty's Vale have been	
			Policy WHAT3 as Local Green Spaces, or in the Appendix B	removed from this paragraph to	
			showing the background justification for the designation of the	prevent confusion.	
			Local Green Spaces. It is assumed that these sites have not		
			been included as Local Green Spaces as they are protected		
			within Policy WHAT1, due to their significance as wildlife		
			conservation sites.		
			It is recommended that this paragraph should state the		
			purpose of these designations explicitly, to avoid confusion,		
			and to ensure that all of these sites are protected from		
			development that is unsuitable.		
50	WHAT3 –	Suffolk	Policy WHAT3: "The following areas are designated as Local	Agree. This needs correcting.	Amend plan
	Local	County	Green Spaces for special protection (as shown on the Map		accordingly
	Green	Council	above" should read 'below' rather than 'above', as the map		
	Spaces		follows the policy.		
51	WHAT3 –	Babergh	The first sentence should refer to 'Map D' and not 'the Map	Agree to deletion	New wording
	Local	District	above'. Delete the reference to Map D at the end of the policy		required and
	Green	Council	as no longer necessary.	Agree that the policy could cover	amend plan
	Spaces			the issue of development but this	accordingly
			The policy is silent on development proposed on local green	needs to be addressed but need	
			space. We appreciate that it seeks to protect these spaces but	to ensure that this is consistent	
			there may be instances where some form of development, e.g.	with the management of green	
			a storage shed to support the playing field, is needed. We	belt as required by the NPPF.	Amond notice
			suggest similar wording to that used in other NPs to replace the	Suggested wording would appear appropriate with slight	Amend policy
			last paragraph:	amendments.	accordingly
			"Inappropriate development will only be permitted in very	amenuments.	
			special circumstances, when potential harm to the local green		
			space by way of inappropriateness, and any other harm, is		
			Space by way of mappropriateriess, and any other narm, is		

			clearly outweighed by other considerations. Permitted development rights, including the operational requirements of infrastructure providers, are not affected by this designation." • There is a light green area shown on Map D and the policies map within Local Green Space (a) next to the school. It could perhaps be useful to define what this is. We presume it is the current playing field	Yes this is the current playing field	
52	Page 42	Babergh District Council	For consistency, repeat Objective 3 in full at the top of the page.	Noted. Objective to be shown in full	Full objective wording to be shown on page 42
53	Chapter 7	Vicki Walker	There seems to be overwhelming support from villagers that new housing should be single properties dotted around the village and this seems to clash with some of the permissions that may be granted.	There is support from the community also for small sites up to 10. Policy WHAT4 sets out the criteria for determining applications that come forward in the Neighbourhood Area. Recent applications in the village were for 15 and 25 dwellings and were refused. The NDP is not allocating specific sites.	No change to Plan
54	Housing/ General	Vicki Walker	As the questionnaire reveals a low appetite in the parish for new development and a feeling that individual new houses should be 'peppered' around the village, I am concerned that the plan seems to shift from this in suggesting that there may be approval for small developments rather than single houses. I also feel that the suggestion of up to 8 houses over 16 years is fairly generous given the size of the village and the recent building.	The NDP is not allocating specific sites. The support for 'pepper potting' in the questionnaire is in relation to affordable housing and the desire to mix it in with other tenures. It does not indicate that all new development should be single dwellings and peppered around the village. The Plan recognises that applications will be made during	No change to Plan

the plan period. Almost half of the questionnaire respondents indicated that they thought recent levels of housebuilding were appropriate. 41% felt up to 8 dwellings would be appropriate with 35% indicating a higher level over the plan period. This could not be achieved through single dwellings within the current settlement boundary. It should also be remember that the village is identified as a Hinterland village in the hierarchy albeit towards the bottom of the scoring matrix and there is an expectation that this layer of the settlement hierarchy will see some development over the plan period. The Pre-Submission Consultation Version of the emerging ILP November 2020 indicates a figure of 1 dwelling as the number of total homes required for Whatfield up to 2036 Para 7.7. Babergh It would be helpful to clarify that the 'one dwelling' is not a new allocation but, instead, relates to a dwelling with planning permission that had not been completed as at the Joint Local Plan base date of 1 April 2018. [NB: It is also presumed this is the same single dwelling at Homeside which para 7.4 identifies as having been completed in 2018			1		.,	
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56	Para 7.8	Babergh	Replace 'on the map below' with 'on Map E below.'	01.04.2020. The Plan also indicates a figure of 1 dwelling as a total homes requirement for Whatfield up to 2036. Text to be updated following the publication of the JLP2020. Agree. This needs amending	Amend plan
	Map Page 44	District Council	Label the map on page 44 accordingly.		accordingly
57	Para 7.9	Babergh District Council	Last sentence, insert '2019' after September to provide context	Agree.	Add 2019 to para 7.9
58	Para 7.13	Babergh District Council	long sentence that would benefit from some editing. Also, 'begun' not 'begin	Agree this sentence can be recast.	Recast para 7.13
59	Para 7.15 and 7.16	Babergh District Council	These two paragraphs could be combined as they relate to the same evidence source. Subsequent paragraphs would need renumbering as a consequence	Agree to merge these paragraphs	Merge paragraphs 7.15 and 7.16
60	Chart on Page 46	Babergh District Council	The Chart and Key seem to bear no relationship to each other	The key can be amended for clarity	Amend key accordingly
61	Page 47	Suffolk County Council	In the pie chart 'How would you like to see the delivery of the housing growth?' on p47, the yellow section (2%) is not defined in the key.	Agree the diagram needs amending	Amend diagram
62	Para 7.18	Babergh District Council	Could be better phrased as relates to two separate charts: "When considering how new housing growth might be delivered, e.g. the size of individual sites, there was a clear preference expressed for small individual plots within the existing settlement boundary or for small sites up to 10 dwellings, as shown above. From the evidence below, it can be seen that incremental, infill development and small developments dominated sentiment on delivery	Consideration to be given to making this clearer	Reword para accordingly

63	Para 7.19	Babergh District Council	Reads as a repeat of para 7.7 and, therefore, seems to add little	Agree that this could be clearer	Amend plan accordingly
64	WHAT4 — New Housing	Lee Walker	The consultation responses in Section 7 show clearly that the desire of the community is for 5% growth at 8 dwellings. I do not feel, therefore, that WHAT4 should propose we allow new housing development outside the defined settlement boundary adjacent to the settlement boundary. This housing may be at odds with the desire to limit development within the boundary. We may end up with a settlement of up to 5 houses. This is not in keeping with the spirit of the plan as expressed in the rest of the document.	The NDP is not allocating specific sites. The Plan recognises that applications will be made during the plan period. Almost half of the questionnaire respondents indicated that they thought recent levels of housebuilding were appropriate. 41% felt up to 8 dwellings would be appropriate with 35% indicating a higher level over the plan period. This could not be achieved through single dwellings within the current settlement boundary. It should also be remembered that the village is identified as a Hinterland village in the hierarchy albeit towards the bottom of the scoring matrix and there is an expectation that this layer of the settlement hierarchy will see some development over the plan period. The Pre-Submission Consultation Version of the emerging JLP November 2020 indicates a figure of 1 dwelling as the number of	No change to Plan

				total homes required for	
				Whatfield up to 2036	
65	WHAT4 –	Vicki	I feel very strongly, like the majority of residents, that the best	See response to representations	No change to
	New	Walker	way to develop this village is for individual dwellings to be built	above.	Plan
	Housing		in different locations. A small cluster of houses would have its		
			own identity, which would detract from village. It would also		
			have an impact on the physical and social integration as a		
			result of this separate identity. I think the village suits one-off		
			individual housing that does not stand out due to number or	See also SCC representation	
			being part of a small establishment.	below	
			I am pleased that there is recognition of the importance of		
			highway safety. However, I think this needs to be a		
			consideration at the forefront of thinking when it comes to the		
			position of new housing. The Street is a pressure point in the		
			village and is often congested. Large vehicles mean that cars		
			sometimes have to mount any pavement or on occasion, pull		
			into private driveways. Parked cars present a further hazard for		
			drivers and pedestrians. Visibility is poor for many residents		
			emerging from houses and the lack of a pavement along large		
			sections of The Street, mean that any further housing should		
			be not be approved in this area unless the infrastructure (i.e.		
			road widening and pavements) is improved.		
66	WHAT4 –	Suffolk	Transport	Comments noted. New wording	Amend plan
	New	County	As Whatfield is a rural village that is somewhat limited with	to be included	accordingly
	Housing	Council	access to local facilities, it is therefore unsurprising that there is		
			quite a heavy reliance on personal car usage. It is noted that		
			there is also limited public transport. SCC acknowledges the		
			lack of footways and that road width is limited in the village,		
			and the only opportunity for the parish to improve the ability		

			for walking and cycling is likely to be the enhancement of PRoW and other off-road provisions such as bridleways. It is suggested that part b) of Policy WHAT4 New Housing is reworded slightly, to be in line with paragraph 109 of the NPPF: "b) development would not have an adverse <i>unacceptable</i> impact upon the historic or natural environment or highway safety"		
67	WHAT4 – New Housing	Lawson Planning Partnership on behalf of M Chisnall & Sons	The approach of the DWNDP in general, and housing and built environment strategy in particular, is considered to be deficient as it is not; Underpinned by relevant & up to date evidence of Whatfield's local housing needs as a 'Hinterland Village';	It is the role of the Local Planning Authority (Babergh District Council) to calculate the Local Housing Requirement. The most recent version of the Emerging JLP published in November 2020 is supported by a raft of evidence	No change to Plan
			 Does not meet its housing or infrastructure needs over the period 2018-2036; Does not support & justify its housing polices – WHAT 4 (New Housing) & WHAT 5 (Housing Mix); 	in respect of housing numbers. The JLP 2020 identifies the total homes required for Whatfield up to 2036 as 1 dwelling. The Local Plan also indicates that there was outstanding planning permission	
			Does not allocate any sites for housing or include any mechanisms for delivering sustainable development, including affordable housing, social or physical infrastructure; With the above in mind, by applying the 'standard method' for identifying housing needs, and using a proportional approach based on the village's population and housing spatial distribution of 10% for Hinterland Villages set out in Policy SP04	for 1 dwelling in Whatfield at the base date of the Local Plan which is 01.04.18. The reasons for not allocating specific sites in the Neighbourhood Plan is given at para 7.22. There is no obligation for NDPs to allocate sites.	
			of the 2019 Babergh & Mid Suffolk Joint Local Plan Preferred Options Consultation (JLP) Whatfield is considered to have a 'minimum' housing requirement of 21 units.	Paragraph 29 of the NPPF advises that they should not promote less development than set out in strategic policies. Policy WHAT4 is so worded that it allows for new	

- 11. This figure is arrived at by dividing Whatfield's current population of 381 (2018 ONS) into the 15,918 population of the Hinterland Villages (less the East Bergholt East End and Shotley Gate localities where needs are met within the East Bergholt and Shotley Street Core Villages) which equates to $2.4\% \times 894$ homes =21.456 (21 homes).
- 12. This approach has been adopted by the adjoining neighbourhood plan area of Aldham. The Aldham Neighbourhood Plan was 'Made' in January 2020 following examination, and allocates sites for 12 dwellings and allows for an additional 3 windfall dwellings (15 total) to come forward across the plan period to 2036.
- 13. It is noteworthy that although listed as a 'Hamlet Village' with fewer facilities and lower sustainability than Whatfield, by adopting an evidenced based approach to identifying its housing needs, its housing strategy met the 'basic conditions' necessary in order to proceed through to being 'Made'.
- 14. To provide further context to the deficient approach being taken by the WDNDP as a 'middle ranking' Hinterland Village, the housing provisions of all the Hinterland and Hamlet Villages in Babergh are sequentially ordered by housing requirement and included at **Annex 1**.
- 15. The tables included at **Annex 1** also demonstrate the inconsistent approach currently being taken by the JLP which is the subject of objections currently under consideration in advance of the publication of the Regulation 19 Plan.
- 16. An alternative approach to identifying the village's housing needs based on the forecasted population growth over the

development subject to criteria. The Neighbourhood Plan also takes into account the lack of available public transport, limited employment opportunities, the lack of safe footways in The Street and the relatively limited range of services available in the parish. Therefore the Neighbourhood Plan is not promoting less development than the emerging Local Plan and is consistent with both the emerging Local Plan and the NPPF. Please see also responses from Babergh DC and Suffolk County Council which do not raise any issues of conformity.

period 2018-2036, indicates a housing need of 19 homes as follows;

- ❖ 381 population x 0.7% annual population increase (ONS data 2014) x 18 years = 48: Divided by Whatfield's 2.5 average household size = 19 homes.
- 17. The current approach of the DWNDP to identify a potential need for '8 dwellings' is not underpinned by any relevant up to date evidence, and seems to have arisen from local opinion based on the questionnaire findings, and is considered to be deficient and therefore flawed as an evidence base.

No sites are allocated to meet the potential need for 8 dwellings, and furthermore, DWNDP Policy WHAT 4 proposes to meet this requirement by relying on "windfall development" of up to 5 dwellings within the defined settlement boundary, or through speculative development of up to 5 dwellings outside of, and immediately adjacent to, the settlement boundary subject to certain criteria being met.

- 19. The village settlement boundary is however tightly drawn, and there are no realistic opportunities for "windfall development" to come forward over the plan period.
- 20. In addition, two sites proposing housing immediately adjacent to the settlement boundary (south east of Wheatfields & south of Naughton Road) have been refused planning permission by Babergh DC in 2019, with the Wheatfields Site being dismissed on appeal in 2020, as the sites were not considered to be well related to the village and harmed landscape character.

- 21. The inclusion of a significant area of land as an 'Area of Important Local Landscape Quality' in the DWNDP, indicates that there are limited opportunities for sites to come forward for housing over the plan period.
- 22. With the above in mind, the DWNDP policies map is included for information at **Annex 2**.
- 23. The housing and built environment strategy is not considered to contribute to the achievement of sustainable development in Whatfield for the following reasons;
- ❖ Insufficient provision is made for new housing to meet the village's local needs, including affordable housing, over the period 2018-2036;
- ❖ Insufficient provision is made to sustain the village's local services, facilities & infrastructure needs over the period 2018-2036;
- 24. The demonstration that the DWNDP has not currently made provision for the village to meet an evidence based (objectively assessed) local housing need is set out above.
- 25. In relation to the need for affordable housing, whilst the DWNDP identifies a need to provide for a mixed and inclusive community incorporating affordable housing, housing for key workers, first time buyers, family housing and bungalows for the elderly, it omits to include any 'delivery mechanisms' to realise these needs.
- 26. By constraining the housing land market to sites limited to a maximum of 5 dwellings (Policy WHAT 4) there would be no

opportunity for affordable housing to be provided - as the NPPF advises planning authorities to only seek affordable housing in connection with 'major development' comprising sites of 10 dwellings or more or 0.5 ha or more. 27. This requirement is reflected in Policy SP02 of the JLP, which stipulates a requirement for 35% affordable housing provision on sites of 10 or more dwellings, or on sites of 0.5 ha or more. 28. In order to be 'policy compliant' with the DWNDP, any sites of 0.5 ha or more would be limited to a maximum of 5 dwellings providing a very low site density of 10 dwellings/ha. This eventuality is considered to be unlikely, as JLP Policy SP02 would require such sites to provide 3 market units and 1.75 (2) affordable units (35%) which would prejudice a developer's ability to fund the physical and social infrastructure necessary to deliver the site. 29. The more likely scenario, is that the land market would

- 29. The more likely scenario, is that the land market would respond by providing sites of <0.5ha to deliver 5 market units, to ensure that the necessary physical and social infrastructure could be adequately funded.
- 30. In addition, to adequately fund the physical and social infrastructure required to deliver a 5 unit development, and in responding to market demand, the likelihood is that a developer would opt to bring forward an increased proportion of larger (4 bedroomed) homes, with no provision for first time buyer or key worker housing.
- 31. The DWNDP housing and built environment strategy is also unlikely to provide sufficient housing growth to 2036 to sustain

the village's important village facilities and social infrastructure, including the primary school and village hall in particular, or meet its needs for physical infrastructure requirements - such as the need for a 'safe route to school' and 'speed indicator' devices to reduce traffic speeds through the village.

- 32. With a prospective limit of 8 dwellings (e.g. 5 & 3 dwellings across 2 sites) at an annualised rate of 2.25 dwellings, it is likely that no discernible contribution would be made to sustain the village's social infrastructure or provide new social or physical infrastructure (via CIL funds or otherwise) across the Plan Period to 2036, a fact acknowledged in the DWNDP itself.
- 33. This demonstrates that the DWNDP would not contribute to the achievement of sustainable development, as reflected in the NPPF's social objectives which requires the planning system, through the preparation and implementation of plans to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of the present and future generations, and by otherwise supporting communities health, social and cultural well-being.

Development Plan Strategic Policies

- 34. The DWNDP is not considered to be in conformity with the following JLP strategic policies;
- ❖ Policy SP01 as the current approach is unlikely to provide for a suitable mix, type and size of new housing development, as outlined above;

			 ❖ Policy SP02 – as the current approach is unlikely to make any contribution towards the need for affordable housing as outlined above; ❖ Policy SP03 – as the current approach relies on an out of date Built Up Area Boundary (settlement boundary) which has not been reviewed since 1995, & is not a reliable basis for assessing the merits of planning applications within the Hinterland Village – this shortcoming is considered further in the next section below; ❖ Policy SP04 – as the current approach is unlikely to make a suitable proportional contribution to the housing required in Hinterland Villages, which contain facilities & services requiring to be sustained as outlined above; 		
68	WHAT4 – New Housing	Lawson Planning Partnership on behalf of M Chisnall & Sons Ltd	Vacant Land North of The Street, Whatfield 35. In the light of the plan making deficiencies outlined above, there is considered to be no valid basis for not including vacant Land North of The Street as a housing allocation within the DWNDP. 36. The site is both suitable and available for housing, and is actively being promoted by M Chisnall & Sons for housing purposes through the JLP and DWNP plan making processes. 37. Its inclusion within the DWNDP housing and built environment strategy is considered to address the deficiencies outlined above, and would assist in demonstrating that a suitably 'evidenced based' plan which meets the village's local housing, services and infrastructure needs (achieving	See representations made by Lee and Vicki Walker in respect of views and green spaces. See also BDC representations	No change to Plan

The state of the s	1
sustainable development) has been prepared to meet the	
'basic conditions' test.	
38. The site comprises a 0.7 ha parcel of vacant land which lies	
partly within and partly outside of the settlement boundary,	
and a site location plan is included for information at Annex 3.	
39. It is usual for village settlement boundaries to be reviewed	
every 5 years in association with the evidence based studies	
underpinning local and neighbourhood plan making processes,	
however the current 'Built Up Area Boundary' for Whatfield	
has not been updated since 1995 and is clearly out of date.	
has hot been apaated since 1995 and is clearly out of date.	
40. With this in mind, it is not considered to be a robust basis	
for assessing the merits of potential housing sites against the	
criteria set out in DWNDP Policy WHAT 4, as it is not a reliable	
policy tool for assessing the relationship of sites to the built up	
area or against countryside character.	
area of against countryside character.	
41. This shortcoming has recently been recognised by the	
Secretary of State in his decision to 'allow' an appeal for	
·	
housing in Long Melford, citing the village's Built Up Area	
Boundary as being an unsatisfactory basis for assessing built up	
area or countryside character, as the boundary had not been	
reviewed and the relevant policy was out of date.	
42. In and or far the DWNDD to place any relience and (12) and	
42. In order for the DWNDP to place any reliance on a 'criteria	
based' policy for assessing planning applications for housing	
development in this way, it is considered necessary for the	
village settlement boundary to be reviewed, and updated,	
before it proceeds to be a 'Plan Proposal' pursuant to	
Regulation 15.	

			43. As part of the process of promoting the site and demonstrating its suitability for housing, the village settlement boundary has been reviewed by M Chisnall & Sons in the light of the criteria for identifying logical and defensible features to form the boundary between the built up area and countryside. 44. This work indicates that the settlement boundary is not robust when assessed against Babergh DC's criteria for determining and updating settlement boundaries. It is evident therefore, that the entire 'proposal site' forms part of the built up area, and the current settlement boundary line which traverses the vacant paddock land (placing a significant part of the site in the countryside) has no planning basis, and is no longer appropriate. 45. A reasoned justification for extending the settlement boundary further north to align with a strong and defensible, well treed, hedgerow feature which separates the site from the wider countryside beyond, along with a plan to show the settlement boundary extended accordingly, and revised, are included at Annex 4 and Annex 5 respectively.		
69	WHAT4 – New Housing	Lawson Planning Partnership on behalf of M Chisnall & Sons Ltd	Proposal Site North of The Street - Housing Potential & Infrastructure Provision 46. The work undertaken to consider the site's planning opportunities and constraints to date, indicates that at a density range of 21 – 28 dwellings/ ha the site could deliver between 15 – 20 dwellings, which would make a significant contribution to meeting the village's housing needs to 2036. 47. At these densities, it is envisaged that the site could deliver the following level of market and affordable housing and social/ physical infrastructure provision;	See representations from Lee and Vicki Walker and BDC above	

 ❖ 10 − 13 market houses at an appropriate mix to provide for a mixed & inclusive community in line with DWNDP Policy WHAT 5;
❖ 5 − 7 affordable houses to help meet local needs in line with DWNDP Policies WHAT 4 & WHAT 5;
❖ Social & physical infrastructure support & provision — including sustaining the primary school roll & village hall vitality, a safe route to the primary school & related pedestrian road crossing, permanent footway link from The Street to the public footpath to the rear of The Traverse, bus shelter provision, speed indicator devices & traffic calming surface road dressing;
❖ Parish Council CIL contributions – for use as required, to upgrade the local footpath signage/ infrastructure, village benches/ litter bins/ notice board etc; Charlotte Curtis 8 7th October 2020
A high quality scheme is also envisaged which would have clear regard to DWNDP Policy WHAT 6;
48. An opportunities and constraints plan which reflects a number of these funding provisions is included for information at Annex 6 .
49. An indicative materials palette in support of the proposal site is also included at Annex 7 .

70	WHAT4	Lawson Planning Partnership on behalf of M Chisnall & Sons Ltd	Concluding Remarks 50. We OBJECT to the Draft Whatfield Neighbourhood Development Plan as it is not considered to meet the requirements of Paragraph 8, Schedule 4B of the Town & Country Planning Act 1990, as it fails to meet 'basic conditions' for preparing a neighbourhood plan. 51. In particular the current approach is deficient as it does not have sufficient regard to national policies and advice contained in guidance for plan making issued by the Secretary of State. 52. The housing and built environment strategy would not contribute to the achievement of sustainable development in Whatfield, and is also not considered to be in general conformity with strategic policies in the Babergh & Mid Suffolk Joint Local Plan Preferred Options Consultation 2019. 53. Furthermore, vacant land which is suitable and available for housing (and actively being promoted to meet the village's housing, services and infrastructure needs) is omitted from the housing & built environment strategy for no valid reason, and ought to be included as an allocation within the Plan. 54. We look forward to liaising with you in due course to discuss revisions to the Plan before it progresses to Regulation 15 stage, which would enable it to deliver the village's local housing needs and services/ infrastructure requirements to 2036, and provide for a document which meets 'basic conditions'	It is considered that the WNDP as currently drafted (with amendments as laid out in this table) meets the Basic Conditions. No issues of conflict with national or local policy have been highlighted by BDC or SCC or the statutory consultees. The NDP is not obliged to allocate specific sites. The reasons for not doing that are made clear in the plan and the plan is positively prepared and includes Policy WHAT4 which does allow for new development over the plan period, subject to criteria.	No change to Plan
71	WHAT4	Babergh District Council	The second paragraph refers to primary school capacity but we understand that Suffolk County Council would not comment on an application under 10 dwellings so this position may not be	See SCC representation above in respect of school capacity.	Amend plan accordingly in respect of g)

			clear when determining the planning application. [NB: SCC may comment further on this in their own Reg 14 consultation response]. • CIL from the new dwellings would deliver monies for infrastructure but we may not have the evidence from infrastructure providers as to whether there is capacity within infrastructure for applications of 5 or less dwellings. • Criteria g) reads as a repeat of criteria c)	Agree. This will be deleted.	
72	Para 7.25	Babergh DC	Not a comment on the Plan as such but are respondents (local residents in particular) aware that, under current planning guidance, there is no specific requirement on developers to make affordable housing provision where schemes consist of 10 units or less	A sentence could be added to the plan to ensure this is stated.	Add sentence referring to affordable housing thresholds to Para 7.25
73	WHAT 5 – Housing Mix	Suffolk County Council	It is noted that Policy WHAT5 Housing Mix shows a preference for a range of different housing types. It is also noted that there is a preference for bungalows to provide for older and less mobile people, however there are other house types that are also suitable for this purpose. It is recommended that this policy also includes support for homes that are accessible and adaptable (i.e. homes that are built to M4(2) standards). This will ensure that housing is able to meet the needs of an aging population without excluding the needs of young families and first-time buyers. Whilst Whatfield does not specifically have a particularly high proportion of elderly residents, the population of Suffolk is typically one that ageing, and so it is recommended that the future needs of residents are considered. Therefore, the following wording is suggested: "Support will be given for smaller 2 and 3 bedroomed homes that are adaptable (meaning built to optional M4(2)	Agree to suggested wording	Amend plan accordingly

			standards), in order to meet the needs of the aging population, without excluding the needs of the younger buyers and families."		
74	WHAT5 – Housing Mix	Vicki Walker	However, as I mentioned in my earlier comment, the socio- economic profile of people looking to live in Whatfield tends to be people looking for a rural lifestyle. Therefore, larger gardens are needed to ensure marketability and that people stay in the village for a long time to maintain and develop a strong community feel.	NPPF requires that we plan for a mixed and balanced community and for sustainable a development. To achieve this, a range of housing types needs to be planned for. The existing housing stock of Whatfield is dominated by large detached and semi-detached houses occupied by single family households. The results of the questionnaire indicate support for a range of types of housing including small and family housing and affordable	No change to Plan
75	WHAT5 Housing Mix	Babergh District Council	To allow for some flexibility in the policy, and to acknowledge that not all schemes will be able to accommodate all of the types of housing listed, it is suggested that the second sentence be amended to read as follows [or similar]: "In line with the latest available evidence of need, the mix of housing should include elements of at least one of the following:"	Agree. Policy to be amended accordingly	Amend policy WHAT5 accordingly
76	Whatfield Design Guide Pages 55- 64	Babergh District Council	It is hard for us to be precise about this but there is a sense of repetition that, with some further thought, might be eliminated. For example, see paragraphs 7.36, 7.37, 7.39 and 7.44 which all mention the photographic exercise	Agree to review this section to make more streamlined	Amend plan accordingly
77	Para 7.38 (7.40)	Babergh District Council	We suggest para 7.38 read: "Accordingly, the NPWG sought to identify how the subject of design could best be accommodated within the Plan. Our conclusion is that this will be presented as	Agree to reword as suggested	Amend plan accordingly

			a trio of separate but interrelated sub-policies; Style, Materials, and Layout & Quality, which collectively form the "Whatfield Design Guide". Para 7.40 then becomes superfluous. Subsequent para's will need re-numbering.		
78	Page 57	Babergh District Council	To tie in with the first of the three identified sub-policies, suggest the sub-heading simply read "Style".	Agree to reword	Amend accordingly
79	Para 7.43 and 7.44	Babergh District Council	Suggest that these two paragraphs could be combined.	Agree these can be combined	Amend accordingly
80	Para 7.45	Babergh District Council	What following questions?	Agree this needs rewording to refer to the questionnaire responses	Amend plan accordingly
81	Para 7.50	Babergh District Council	A messy paragraph that repeats itself. We suggest: "Turning to the issue of dwelling layout and amenity, residents were asked about issues such as garden size, levels of parking, and storage for refuse and recycling. In addition, the NPWG also considered future needs in terms of the move towards sustainable living; including enable people to grow their own food, and to ensuring that dwellings permitted and constructed through this plan period are capable of adaptation to allow for home-working	Agree to reword	Amend plan accordingly
82	WHAT6 Style	Babergh District Council	To avoid the sense of repetition, we suggest that a re-write of these two paragraphs is needed. In particular, the last sentence in the second paragraph seems to simply repeat what has already been said.	Agree to re-write	Amend plan accordingly
83	WHAT 6 Materials	Babergh District Council	The use of the word 'encouraged' may mean that future developers do not adhere to these aspects of the policy. Using a stronger term in the policy, such as 'should', could help to ensure that these requirements are met. This might be	Agree that the wording could be stronger	Amend plan accordingly

			particularly helpful re the inclusion of rainwater harvesting features and wildlife features which are always more likely to be acceptable, whereas material use may be more specific to the context and material use in surrounding building in which case 'encouraged' may be a better word. You may also want to say "including, but not limited to, bat bricks and swift bricks will be supported."		
84	WHAT 6 Layout and Amenity	Babergh District Council	Criteria a) is very precise and there is no obvious justification or evidence to say why, for example, a lower percentage of amenity space / garden footprint is not acceptable.	Agree this section could be clearer and has been reworded for clarity.	Amend plan accordingly
			One Officer has commented that another interpretation is that the policy requires a huge amount of land within any given plot to be utilised as garden space. For the decision maker (and presumably also the applicant) it would be useful to know what is mean by that. Qstn: Is that around 85 - 90% of the plot should be garden land, or does that include the space required for parking and/or garages? Reading it, it is sounds as though, on a typical 100m2 plot, between 15m2 and 8m2 would be left for a dwelling which might be tight? Criteria b): We suggest that it read: "Provision for garages / offstreet parking in accordance with the adopted Suffolk County Council Parking Standards"	Agree to this wording	Amend plan accordingly
85	WHAT6 – Whatfield Design Guide	Vicki Walker	I really like the emphasis on locally sourced materials and the fact that quality and appearance will be key to approval	Support welcomed	No change to Plan
86	WHAT6 and Para 7.53	Suffolk County Council	Flooding WHAT6 supports/encourages the provision of SuDS in housing proposals. WHAT4 supports small housing grouping of five or	Agree to add new wording after para 7.53	Amend plan accordingly

			development, defined as 10 dwellings or more. It is suggested that the following text should be added to the end of paragraph 7.53 or inserted as an additional new paragraph after existing paragraph 7.53. This would aim to add explanation and weight to Policy WHAT6 part g). "Whilst it is acknowledged that the NPPF in relation to SuDS is only a consideration for major developments, the provision of sustainable drainage systems in developments supports the aspiration for good design, sustainable development,		
			contributes to environmental net gain and place setting, it should be considered for incorporation in minor developments as well. Early consideration of SuDS in site layouts and drainage strategies will help their delivery as beneficial multifunctional features."		
87	WHAT6 – Whatfield Design Guide	Suffolk County Council	In Materials section of this policy: "Wildlife features that seek to encourage and support wildlife species including bat bricks and swift bricks will be supported" is welcome.	Support welcome	No change to Plan
88	WHAT6 – Whatfield Design Guide	Suffolk County Council	Parking Paragraph 7.52 states that questionnaire results displayed preference for parking to be off-street. However, SCC would strongly recommend that the neighbourhood plan should include support for a proportion of well-designed on-street parking to be included within any new developments. On street parking is inevitable, and poorly designed developments without considerations for on-street parking can lead to obstruction of the roads and footpaths, causing difficulties in access for both pedestrians and road users, as well as for	Comments noted. Agree to reword	Amend plan accordingly

			emergency service and refuse vehicles. Please see Suffolk Guidance for Parking pages 25-28 for further guidance5. Therefore, the following wording is recommended to be included in Policy WHAT6 The Whatfield Design Guide: "b) Provision for Garages and /off street parking, in line with Suffolk Guidance for Parking (2019), including a proportion of well-designed and integrated on-street parking provisions which avoids obstructions within any new developments." The bus stops on The Street would benefit with some improvements; provide raised kerbs to DDA (The Disability Discrimination Act 1992) standards but there is insufficient room to erect bus shelters. The Plan does not include any allocation for housing in the villages. However, if there are any future developments (such as 'infill'), a developer would need to consider the impact it would have on the highway. Recent applications have been refused on lack of connectivity for pedestrians. There is little chance of improving the pedestrian facilities in the centre of the village within the existing highway boundary. Therefore, lack of improvements to the footway network and bus stops to promote sustainable transport would not be to NPPF		
	5 1 1	0 (0 11	standards.		
89	Public Rights of Way/ WHAT6	Suffolk County Council	Public Rights of Way The Whatfield Neighbourhood Plan recognises the Public Right of Way (PRoW) network under 2.34 'Footpath Network' (page 16), and we welcome the statement under 'Policy WHAT6 — The Whatfield Design Guide', 'Layout and Amenity' (page 65), that PRoW should be protected, and enhanced where possible. There could also be reference to strategies that support this Neighbourhood Plan. This includes Suffolk County Council's Green Access Strategy (2020-2030)4. This strategy sets out the council's commitment to enhance public rights of way, including new linkages and upgrading routes where there is a	Agree to refer to strategies in the supporting text	Amend plan accordingly

			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.		
90	Para 8.6	Babergh District Council	Para 8.6 sits under the 'Implementation' sub-heading but relates better to 'Monitoring'. Perhaps it and para 8.7 could be combined to succinctly explain the monitor and review process	Agree to reword	Amend plan accordingly
91	Glossary	Babergh District Council	Make the Glossary relevant to the Plan. For example: There is no mention of 'Brownfield Land or Site' within the Plan There is no Conservation Area in Whatfield so why out this in the Glossary? Duty to Co-operate. Again, not specifically mentioned anywhere other than in the Glossary.	Agree. The Glossary needs revising to ensure it contains all required references in this NDP	Review and amend glossary
92	Policies Maps Appendix F and Appendix G	Babergh District Council	On the 'Inner' map, it may be helpful to include a policy number cross reference against the relevant criteria in the Key. The 'Inner' map shows a number of intersecting dashed green lines. Qstn: Are these the 'Public Rights of Way mentioned in the final paragraph of policy WHAT 6? If yes, the key should be updated to include these. If not, they should be removed from the map. (Same applies to map on page 37). There is no Key on the 'Outer' map. We remind you also about our comments relating to identifying County Wildlife Sites.	Agree to review map and amend as appropriate	Amend maps accordingly
93	Minerals and Waste	Suffolk County Council	Minerals and Waste SCC is the Minerals and Waste Planning Authority for Suffolk. This means that SCC decides planning applications and makes local plans for minerals and waste. The relevant local policy document is the Suffolk Minerals and Waste Local Plan. Some	Comments noted	No change to Plan

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	of these policies safeguard potential minerals surfaces and	
	minerals and waste facilities.	
	Having reviewed the neighbourhood plan SCC has identified	
	that an area in the south west of the parish is within an area of	
	potential minerals resource, however does not consider that	
	the proposals in the plan cause safeguarding issue.	
	Additionally, there are no minerals or waste facilities within the	
	parish, so the neighbourhood plan does not cause any facilities	
	safeguarding issues.	