

BABERGH DISTRICT COUNCIL

From: Assistant Director - Planning for Growth	Report Number: S42
To: Strategy Committee	Date of meeting: 14 July 2016

EAST BERGHOLT NEIGHBOURHOOD PLAN

1. Purpose of Report

- 1.1 This report presents the findings of the Independent Examiner's Report on the content of the East Bergholt Neighbourhood Plan Submission Draft.
- 1.2 Subject to the implementation of the detailed recommendations contained within the Examiner's Report, it is proposed that the Plan should proceed to a local referendum.

2. Recommendations

- 2.1 That East Bergholt Parish Council be requested to make the necessary modifications to the Plan in accordance with the Examiner's recommendations.
- 2.2 That, subject to satisfactory completion of the necessary modifications, the plan be advanced to a local referendum covering the parish of East Bergholt.

The Committee is able to resolve this matter.

3. Key Information

- 3.1 The Localism Act, 2011 introduced the concept of neighbourhood plans. These are plans that are developed by local people for the community in which they live and work. Neighbourhood plans provide communities with an opportunity to prepare planning policies and allocate land to shape the future of their area. Each plan consequently has its own character.
- 3.2 In March 2014 the East Bergholt neighbourhood planning area designation application was approved by the District Council. This enabled the parish council to prepare its plan. In October 2015 the parish council agreed to publish the first draft of its neighbourhood plan. There then followed a six week consultation period during which time the District Council submitted its comments to the parish council. These comments expressed doubt over the approach to future housing growth in the village (amongst other things) and pointed out that there was conflict with the District Council's strategic planning policies and the provisions of the National Planning Policy Framework.
- 3.3 In January 2016 the parish council formally submitted the plan to the District Council. The plan was checked for compliance with the relevant legal requirements and a further six week consultation was conducted between 18 January and 1 March 2016. During this period 18 representations were received, some of which expressed concern over the approach to future housing growth in village and highlighted that there was a conflict with the District Council's strategic planning policies and the provisions of the National Planning Policy Framework.

- 3.4 In March 2016 the examination of the plan commenced. It was conducted by a 'suitably qualified and experienced' person who was independent of the plan making process via written representations. The Examiner was selected in consultation with the parish council through the Neighbourhood Plan Independent Referral Service (a national service run by a consortium of the relevant professional bodies and community organisations).
- 3.5 In May 2016 the Examiner's Report was published. It contained 30 detailed recommendations on how the plan should be modified to make it acceptable, including substantive revisions to Policies EB1 and EB2 which have been a matter of concern throughout the entire process. A compendium of the suggested modifications has been attached to this Paper. Please see **Appendix 1**. The recommended modifications are however fully explained in the Examiner's Report. Please see **Appendix 2**.
- 3.6 The District Council must now consider each recommendation and the reasons for them, and decide what action to take in response to each one. It must also come to a formal view about whether the Plan meets the 'Basic Conditions' as outlined in Paper S8 presented to Full Council on 26 April 2016.
- 3.7 The 'Basic Conditions' are set out in Paragraph 8(2), Schedule 4B the Town and Country Planning Act, 1990. In order to satisfy them a Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - be in general conformity with the strategic policies contained in the Development Plan for the area;
 - contribute to the achievement of sustainable development; and
 - not breach, and be otherwise compatible with, EU obligations and human rights requirements.
- 3.8 The Examiner has concluded that, subject to the implementation of the suggested modifications, the Neighbourhood Plan meets the Basic Conditions and other statutory requirements and can proceed to a referendum. In the main the recommendations involve improving the wording of policies so that they are clear and unambiguous and can be used in a consistent manner by decision makers. The recommendations of note centre upon the following policies:
- **the phasing is deleted from Policy EB1.** This policy as it appears in the submission draft of the neighbourhood plan has been a matter of concern for a number of parties who have commented on the content of the Plan. As already indicated, this concern was expressed at both consultation stages. The Examiner concurs with the views expressed and has recommended that the policy is revised to comply with the Basic Conditions.
 - **criteria are included in Policy EB2 on the location of new housing development from the background text.** The Examiner has recommended that this policy is substantially revised to ensure that the policy takes account of national planning policy and is in general conformity with the strategic policies in the Local Plan.
 - **Policy EB4 is revised to include reference to the provision of affordable housing.** The Examiner considers that revisions are required to this policy to ensure that reference is made to the strategic policies contained within the Local Plan and to improve the clarity of the wording. It is recommended that the third component of the policy be deleted as it is too restrictive.

- **Policies EB5 and EB6 are amalgamated and the wording clarified to improve housing options for older people.** This recommendation has been made to ensure that the Plan is consistent with the provisions of the National Planning Policy Framework which requires that policies are clear and unambiguous.
- **Policy EB7 is revised to require development proposals to demonstrate their impact on the village setting. The safeguarded views are deleted.** This recommendation has been made to ensure that the Plan is consistent with the provisions of the National Planning Policy Framework which requires that policies are clear and unambiguous.
- **Policy EB8 is reframed to accord with NPPF guidance on Local Green Space. The appropriateness of the sites has been reviewed.** The Examiner expresses concern that the assessment of local green space may not have been carried out fully in accordance with the criteria set out in the National Planning Policy Framework. Nevertheless, the Examiner recognises that some sites do merit safeguarding, in particular playing fields, play areas and larger amenity areas. Large gardens, agricultural land and highway verges do not however warrant inclusion as green infrastructure.
- **Policy EB11 is revised to include specific reference to the consideration of non-listed heritage assets in conservation areas. The proposal for a Local List is moved to the Projects section.** This recommendation has been made to ensure that the Plan is consistent with national guidance on the protection of non-designated heritage assets.
- **Policy EB23 on infrastructure is deleted.** The Examiner considers that this policy is unclear and repeats only part of the Local Plan Policy CS21. Furthermore the policy does not have regard to the provisions of the National Planning Policy Framework which requires that policies are clear and unambiguous.

3.9 Officers have assessed the content of the Examiner's Report and each recommendation and concur with its findings. It is therefore recommended to the Strategy Committee that all the modifications proposed be made by the parish council to ensure that to the East Bergholt Neighbourhood Plan complies with the Basic Conditions, thus allowing the plan to proceed to a local referendum. If the Strategy Committee agrees with this recommendation the District Council will need to publicise its decision (a decision statement) and move to a local referendum.

3.10 The Housing and Planning Act, 2016 has made it clear that the only modifications that the District Council can make at this stage are those required to ensure that:

- the plan is compatible with EU obligations,
- the plan does not breach Convention Rights, or
- for the purpose of correcting minor errors.

The District Council is therefore only able to exercise limited discretion at this point.

3.11 The task of modifying the plan falls to the parish council with assistance from the District Council. While there are no prescribed periods for this process, a copy of the plan, as modified, along with other specified documents will be required before the date of the local referendum can be confirmed.

- 3.12 East Bergholt Parish Council has amended the text to its neighbourhood plan in line with the Examiner's recommendations and a revised version has been submitted to the District Council. At the time of writing this report appropriate checks were being made to ensure that the recommendations have been implemented. A copy of the plan, as amended plan, is attached to this report. Please see **Appendix 3**. The plan is therefore nearing the local referendum stage.
- 3.13 The referendum process is governed by the Neighbourhood Planning (Referendum) Regulations, 2012 (as amended). The Regulations set out that not less than 28 working days' notice must be provided of the date of the local referendum. In order to avoid the holiday period the most appropriate date for the local referendum is 8 September 2016. This date would also accord with the date set for the Lavenham Neighbourhood Plan.
- 3.14 The parish council will be expected to promote the referendum but it should be noted that there are restrictions on the publication of promotional material, advertisements and expenses. The format of the Referendum question will be:
- 'Do you want Babergh District Council to use the neighbourhood plan for East Bergholt to help it decide planning applications in the neighbourhood area?'*
- 3.15 If the majority of those who vote in a referendum are in favour of the neighbourhood development plan then the plan must be brought into legal force and 'made' (adopted) by the District Council. A further Paper would be presented to Full Council to ratify the eventual outcome.

4. Financial Implications

- 4.1 The District Council receives £20,000 from the Department of Communities and Local Government for each neighbourhood plan once a referendum date has been set following a successful examination. This sum is paid to meet the District Council's costs and will be sufficient in this case.
- 4.2 If the East Bergholt Neighbourhood Plan is successfully 'made' (adopted) the parish council will be eligible to receive 25% of any Community Infrastructure Levy receipts from development in its area.

5. Legal Implications

- 5.1 The neighbourhood plan has been prepared in accordance with the provisions of the Town and Country Planning Act, 1990, the Planning and Compulsory Purchase Act, 2004 and the Neighbourhood Planning (General) Regulations, 2012 (as amended). It has also had regard to the Environmental Assessment of Plans and Programmes Regulations, 2004 and the Conservation of Habitats and Species Regulations, 2010.
- 5.2 If 'made' (adopted), the East Bergholt Neighbourhood Plan will become part of the Development Plan and, where relevant, used to determine planning applications.
- 5.3 The Monitoring Officer has reviewed the governance arrangements surrounding the preparation of the plan and is satisfied with the actions taken by the parish council throughout the entire process.

6. Risk Management

6.1 The key risks are set out below:

Risk Description	Likelihood	Impact	Mitigation Measures
The neighbourhood development plan fails to receive support at the referendum stage.	Unlikely	Bad	The Parish Council is responsible for promoting the referendum.
Legal challenge to the content of the neighbourhood development plan or order and/or judicial review of the District Council's decisions.	Unlikely	Bad	Ensuring that the relevant Regulations are followed and that the decision-making processes are clear and transparent.

7. Consultations

7.1 The District Council undertook formal consultation on the content of the submission draft East Bergholt Neighbourhood Plan from 18 January to 1 March 2016. Eighteen representations were received and are summarised in tabular form in **Appendix 4**.

8. Equality Analysis

8.1 There are no equality and diversity implications arising directly from the content of this report.

9. Shared Service / Partnership Implications

9.1 This report relates to matters affecting Babergh only.

10. Links to Joint Strategic Plan

10.1 The successful making (adoption) of the neighbourhood plan will enable the District Council to fulfil its corporate priorities, in terms of housing delivery, business growth and community capacity building.

11. Appendices

11.1 Appendix 1 Summary of Recommendations Attached

11.2 Appendix 2 Examiner's Report

<http://www.babergh.gov.uk/assets/Uploads-BDC/Economy/Strategic-Planning-Policy/Neighbourhood-Planning/E-BergholtNDPEXaminerReport.pdf>

11.3 Appendix 3 East Bergholt Neighbourhood Plan – Incorporating Examiner's Modifications

<http://www.babergh.gov.uk/assets/Uploads-BDC/Economy/Strategic-Planning-Policy/Neighbourhood-Planning/EastBergholtNDPIncExamMods.pdf>

11.3 Appendix 4 Submission Draft Consultation Responses

<http://www.babergh.gov.uk/assets/Uploads-BDC/Economy/Strategic-Planning-Policy/Neighbourhood-Planning/E-BergholtNDPSubReps2016.pdf>

12. Background Documents

12.1 East Bergholt Neighbourhood Plan Submission Draft

<http://www.babergh.gov.uk/assets/Uploads-BDC/Economy/Strategic-Planning-Policy/Neighbourhood-Planning/E-BergholtNDPSubmissionJan2016.pdf>

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East Bergholt Neighbourhood Development Plan

Summary of Recommendations: Rosemary Kidd (Independent Examiner)

Recommendation 1:

The paragraphs of the plan are numbered.

All maps are numbered and cross referenced from the policy or text. Maps should include clear titles and place names and should be at a scale that sites and their boundaries are legible and identifiable. Cross reference to maps in Appendices in separate documents would not then be necessary.

Those policies that include a list of criteria where all factors are to be taken into account in considering development proposals should be punctuated with a semicolon at the end of each criterion with an “and” at the end of the penultimate criterion to ensure that all factors are taken into account.

Recommendation 2:

This Current Status section of the Plan be reviewed as the plan progresses to ensure that it is up to date.

Recommendation 3:

Revise the fourth paragraph of section 2.6 to read:

“The Policies *will constitute the Neighbourhood Development Plan and will become a statutory consideration.....*”

Revise the fifth paragraph of section 2.6 to read:

“Projects *do not form part of the Neighbourhood Development Plan. They are activities identified in the feedback.....*”

For the avoidance of doubt it is recommended that each section of projects is headed with the following text “*These do not form part of the Neighbourhood Development Plan*”.

Recommendation 4: Revise Policy EB1 to read

Retitle Policy EB1 “Housing Numbers”

“*A minimum of 86 new homes shall be developed in East Bergholt during the Plan period 2015 to 2030*”.

Delete “to be phased in proportion over three 5 year periods”. Delete those paragraphs of section 3.3.2 relating to phasing.

Delete the second paragraph from Policy EB1.

Replace “correct” in paragraph 6 of section 3.3.2 with “appropriate”.

Recommendation 5: Revise Policy EB2 as follows:

Housing development will be supported within or immediately adjacent to the village Built Up Area Boundaries provided that the development:

- 6. would not have an unacceptable adverse impact on the Dedham Vale Area of Outstanding Natural Beauty, Local Green Spaces or sites of biodiversity and geodiversity importance;*
- 7. conserves, enhances and respects the conservation area, heritage assets and built character of the local area, respecting the density, rhythm, pattern, proportions and height of existing development in the street scene;*
- 8. would not have an unacceptable adverse impact on the local highway network;*
- 9. would be of an acceptable size and scale that contributes to the character of the village and the “Sense of Place”; and*
- 10. is within 800 metres of the Village Heart or Focal Points.*

Housing development on sites not adjacent to the Built Up Boundaries or outside the 800 metres zones will be supported where they satisfy the special circumstances set out in paragraph 55 of the National Planning Policy Framework.

Rural Exceptions Affordable Housing will be encouraged on sites adjacent to or well related to the Built Up Boundaries in accordance with Local Plan Policy CS20.

Housing development of up to 15 homes that is well designed and integrated into the village will be preferred. Developments of 15 or more dwellings will be supported where they deliver exceptional benefits to meet the housing needs of the community including affordable and low cost market housing suitable for newly forming households, young families and homes for older people.

Revise Section 3.3.3.4 to read:

“Policy EB2 sets out the criteria to be used in assessing the suitability of potential housing sites. The intention of the policy is to:”

Retain Bullet points 1-2. Add new bullet point to read: *“avoids adversely impacting on important environmental and heritage assets”.*

Revise third bullet point to read: *“respects the conservation area and village character including houses with large gardens and green aspects”*

Recommendation 6: Revise Policy EB3 as follows

“Within the Village Heart, housing development that satisfies the requirements of Policy EB2 will be supported only for small scale infill development that does not harm the character or appearance of the conservation area, nor adversely impact on the setting of a designated heritage asset. Development should reflect the traditional scale, form, massing and siting of buildings in the area.

“Development, including backland development, on large gardens that adversely affects the character of the conservation area and setting of listed buildings will not be supported.”

Recommendation 7: Revise Policy EB4 to read

Revise the title of the Policy to read “Housing Types, Tenures and Sizes”

“Residential development shall provide a mix of house types, tenures and sizes to support the delivery of the identified housing needs of the parish and its hinterland villages. Affordable housing shall be provided in accordance with Babergh Core Strategy and the Babergh Affordable Housing SPD.

“At least 40% of new dwellings should be one and two bedroom homes.

Delete the third paragraph on replacement homes.

Include a paragraph in the background text to explain how the target figure for small dwellings was derived and how it is intended to be implemented. Include reference to the need for a five year review of housing needs in the background to the policy rather than the policy itself. The findings of the 2014 Suffolk Housing Survey which highlighted the need for housing for newly forming households (ie adults within existing households looking to establish their own household) may also be included. Cross reference to Policy EB2 would be helpful, to explain how sites of more than 15 dwellings can contribute to meeting the need for smaller dwellings.

Recommendation 8: Revise Policy EB5 to read:

Amend title of the policy to: *“Increasing the choice of housing options for older people”*

“Up to one third of new housing developed in the plan area should be designed to meet the needs of older people. The development of homes suitable for older people, including affordable and market housing, of types and sizes that meet local housing need will be supported on sites that satisfy the requirements of Policy EB2. Small scale infill development of older people’s housing within 400 metres of St Mary’s Church will be supported where they provide homes with easy access to the facilities in the Village Heart, subject to conforming to other policies of the development plan.”

“Subject to the need and viability being demonstrated, the development of a care home in the village will be supported.”

Insert Map to show 400 metres of St Mary’s Church.

The background to the policy to include a description of the various types of homes that are envisaged under this policy with reference to the Housing our Ageing Population Panel for Innovation’ (HAPPI) report. Older persons housing could include level access bungalows, purpose built apartments allocated to over 55’s, sheltered accommodation, very sheltered accommodation, retirement villages and assisted living schemes.

Delete the following sentence from paragraph 3.3.5 “This will translate into no more than 28 properties using an average occupancy of 1.5 people”. Add a statement that the need for housing for older people will be monitored through future surveys.

Delete Policy EB6 Supportive Care Accommodation for Older People

Recommendation 9: Delete objective bullet point 5 and move the subject to the projects section.

Recommendation 10: Revise the wording of Policy EB7 as follows:

Development proposals shall demonstrate that they:

6. comply with the policies and guidance relating to the Dedham Vale AONB and its setting;

7. where appropriate, satisfy the development tests set out in paragraph 116 of the National Planning Policy Framework;

8. respond positively to the special qualities and scenic beauty of the Dedham Vale AONB and its setting;

9. have taken full account of the capacity assessment set out in the Landscape Sensitivity and Capacity Assessment (Appendix D.8); and

10. would not have an unacceptable adverse impact on the landscape setting of the village demonstrated through a Landscape and Visual Impact Assessment

Revise the second paragraph of section 4.2 to read “The western and southern parts of the parish lie within the Dedham Vale AONB. The boundary which abuts the built up part of the village is shown on Map XX.

Recommendation 11: Revise Policy EB8 to read:

Policy EB8: Safeguarded Open Space or Local Green Space

Those areas defined Map No XX shall be protected as Local Green Space. Development that would result in the loss of, or adversely affect the function or appearance of, a Local Green Space will only be permitted in very special circumstances.

Of special importance are Open Spaces within the village which *have* recreational *and* amenity value and reduce recreational pressure on the Stour & Orwell Estuaries Special Protection Areas.

The Proposals Map should show the following sites Map at sufficient clarity that the boundaries are clearly legible:

Sites, 1, 2, 3, 4 (larger area only), 5, 6 (larger area only), 7, 20 (playing fields only excluding car park and buildings), 21, 23, 24, 25 (allotments only), 26, 27 (larger area only).

Examples of the very special circumstances should be set out in the background to the policy rather than the policy itself.

Recommendation 12: Revise Policy EB9 as follows:

Paragraph 1: Proposals for development *should*...

Delete “mitigation” from Criterion 4 to read: Promoting the preservation....

Criterion 6 to read: Line 2... Proposals *should* demonstrate...

Criterion 6 to read Lines 5 and 7... measures *should* be carried out...

Delete criterion 7 as it repeats criteria 4.

Delete final paragraph as it repeats much of criterion 6.

Include in the background to Policies EB9 and EB10, "*the incorporation of nest bricks for swifts and house martins will be encouraged*".

Recommendation 13:

Revise the title of section 5.3.1.1 to "Housing Size, *Design and Layout*".

Include the definition of townhouses in criterion 10: "*large terraced or semi-detached houses of at least three storeys, often with an integral garage at ground level*".

Recommendation 14: Revise Policy EB11 as follows:

Revise the title of the policy to "Preservation of Non Designated Heritage Assets".

Delete the first paragraph.

Revise the second paragraph of Policy EB11 by deleting "defined on the Village Local List" and by adding the following at the end: "*Non-listed buildings that make a positive contribution to the character or appearance of the conservation area should be retained, and their demolition should only be permitted in exceptional circumstances*".

Delete the criteria for identifying Non Designated Heritage Assets. Include the proposal to draw up a Village Local List and the criteria for identifying Non Designated Heritage Assets to the Projects section.

Section 7.3.2 includes a paragraph on the County Archaeological Service which may be placed more appropriately in the background to Policy EB11.

Recommendation 15: Revise the first Transport Objective:

"To reduce congestion in the Village Heart....."

Recommendation 16: Revise Policy EB12 to read:

"The Red Lion Car and Coach Park identified on the Map No X shall be safeguarded for parking. The change of use of the site shall only be permitted if alternative parking provision of a similar size is provided in a location accessible to the local facilities in the Village Heart."

Recommendation 17: revise Policy EB13 to read:

"New residential and commercial development shall provide on-site parking provision in accordance with the Suffolk Guidance for Parking Technical Guidance."

“The provision of cycle parking close to businesses will be supported.”

Recommendation 18: Revise Policy EB14:

“New developments should provide.....good pedestrian links to pedestrian routes to the village and nearby countryside. Schemes should.....”

Recommendation 19: Revise the first paragraph of Policy EB15 as follows:

“.....enhance and protect existing “footpath, cycleway and bridleway” networks, create new networks.....”

Recommendation 20: Revise the first paragraph of section 7.2

“.....states that policies should support economic growth.....and increase prosperity by taking a positive approach.....”

Recommendation 21: Revise Policy EB16 as follows:

Retitle Policy EB16: The Development of New and Expanded Businesses

Delete first line of the policy.

“Proposals for the development of new businesses and the expansion of existing businesses will be supported provided that they:

- 6. would not have an unacceptable adverse impact on nearby residential or other uses;*
- 7. would not lead to an unacceptable impact on the local highway network or traffic in East Bergholt village;*
- 8. make provision for adequate vehicle parking;*
- 9. would not have an unacceptable adverse impact on the Dedham Vale Area of Outstanding Natural Beauty, Safeguarded Open Spaces or sites of biodiversity and geodiversity importance; and*
- 10. would conserve, enhance and respect the conservation area, heritage assets and built character of the local area.”*

Recommendation 22: Revise Policy EB17 to read:

Policy EB17 to be retitled *“Safeguarding Employment Land and Premises and Community Facilities”*.

“Existing employment sites, services and businesses that serve the community should be retained in employment, business or community uses, wherever possible.

“Proposals to redevelop or re-use existing employment land, sites and premises or community facilities for non-employment or community purposes, will only be supported if the applicant can demonstrate that their retention for an appropriate employment or community use has been fully explored; or the community facility is to be replaced by a similar or improved facility within the parish.

“The site or premises shall be marketed for a minimum period of 12 months in a manner consistent with the advice in Babergh District Council’s SPD on Safeguarding Employment Land.”

The background to the policy should set out the type of sites, premises and community facilities that the policy applies to.

Recommendation 23: Revise Policy EB18 to read:

“New development not connected with agriculture should avoid the loss of best and most versatile agricultural land.”

Place the second paragraph of the policy in the background text.

The second paragraph of the background section refers to consultation with the Historic Environment Record. It is suggested that this reference may be better placed within paragraph 5.3.2 on the Historic Environment.

Recommendation 24: Revise Policy EB20 as follows:

Revise criterion 3 to read “*would not have an unacceptable impact on the local highway network*”.

Delete criterion 6 and replace with “*The conversion should be sensitive to the setting of the building and its relationship with its immediate surroundings and landscape character; and*”

Add a new criterion 7: “*There would be no material adverse impact on protected species, particularly bats and barn owls.*”

Recommendation 25: Revise Policy EB21 to read:

“Developments that provide facilities or services for the visitor or tourist should be supported provided that they:

5. demonstrate that they would *conserve and enhance* the landscape, *heritage*, character and appearance of the area. Special consideration should be given to developments in or affecting the setting of the Dedham Vale Area of Outstanding Natural Beauty and the East Bergholt Conservation Area;

6. would not have an unacceptable impact on the local highway network and would provide adequate parking provision;

7. be of a scale *and design* that is sensitive to the character of the *landscape and heritage* of the area; and

8. *would not have an unacceptable adverse impact on nearby residential or other uses.*”

The definition of the types of developments that this policy refers to could be included in the background text.

Further advice on the assessments required could be set out in the background text.

Recommendation 26: Revise Policy EB22 as follows:

Delete the second paragraph of Policy EB22 and place the text within the background to the policy.

Recommendation 27: Delete Policy EB23. Renumber subsequent policies.

Recommendation 28: Revise Policy EB24 to read:

“New development *should provide...*”

Add reference to the Suffolk Guidance for Parking in section 9.3.2

Recommendation 29: Revise Policy EB25 as follows:

Revise the first paragraph to read:

“.....will be ten or more) or *for non-residential development with a floor space of 1000 square metres or more or a site area of 1 hectare or more will be expected to provide.....*”

Delete the second paragraph of the policy and include the following text in the background section:

“New development should take note of Suffolk County Council’s *Local Surface Water Drainage Guidance: Standards and Information Protocol for Advising Babergh District Council on Surface Water Drainage Aspects of Planning & Development Control*. This document provides guidance on those elements of flood risk management *and surface water drainage* for which the County Council is a statutory consultee on major *development*.”

Revise the first line of section 9.3.2 to read “.....the risk of flooding *from river, surface water and ground water.*”

Recommendation 30:

Revise text in section 1.2 (page 17) to refer to the RSPB “Wildlife Garden” and not Information Centre.

Delete the first sentence of paragraph 1 of section 1.3 “The tenure pattern is judged to be well balanced.....”. This sentence presents a judgement that may not fully reflect housing need and is considered to be misleading. It conflicts with the background text in the housing section which highlights the needs for housing for younger and older people.

Revise the table in Appendix D17 to set out the correct figures from the SHLAA (2011).

Delete reference to the views of two landowners on deliverability in section 3.3 and Appendix D18. It is not clear which sites are being referred to and the letters give no future commitment to deliverability. Evidence to support the statement is considered to be misleading and implies that all landowners support the plan.

Delete the paragraph in 3.2.1 “A survey of estate agents not yet been built”. This is considered to be misleading and does not provide robust evidence to support the delivery of the plan’s policies. It conflicts with the background text in the housing section which highlights the needs of younger and older people.

Revise the minimum garage size in point 5 of section 5.3.1.1 to 3 metres by 7 metres. Suffolk County Council has noted that this is the minimum garage size in the Suffolk Guidance for Parking.

Include reference to the Suffolk Guidance for Parking in section 5.3.1.1 point 6. Suffolk County Council has pointed out that the Suffolk Guidance for Parking provides detailed guidance on electric vehicle charging points

Delete the second sentence of section 1.8 concerning traffic generated by a housing development in Brantham. Revise the third sentence to read: “*There are concerns amongst the community about the capacity of the junction between the A12 and B1070.*” The County Council has commented that the comments in section 1.8 do not necessarily reflect the corporate view of the Highway Authority and should be deleted. A consequential revision to the third sentence is recommended as a result of the deletion.

Include reference to Historic England guidance on the conversion of traditional farm buildings in the background text to Policy EB20.

Revise section 7.3.3 which refers to “two policies addressing tourist and visitor facilities”. This should be amended to “one” policy.