CHELMONDISTON NEIGHBOURHOOD DEVELOPMENT PLAN

CONSULTATION STATEMENT

CHELPIN PLÁN 2020 - 2036

CHELMONDISTON

PINMILL

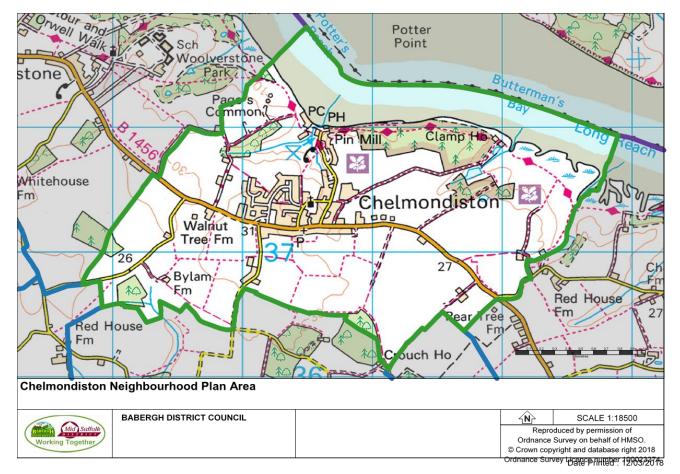
December 2020

Chelmondiston NDP Consultation Statement

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1.0 Introduction and Background



Map 1 Chelmondiston Parish and Neighbourhood Area

- 1.1 This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)¹ which defines a "consultation statement" as a document which
 - a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - b) explains how they were consulted:
 - c) summarises the main issues and concerns raised by the persons consulted; and
 - d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
- 1.2 Planning Practice Guidance provides further advice:
 - "A qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan (or Order) and ensure that the wide community:
 - Is kept fully informed of what is being proposed
 - Is able to make their views known throughout the process

¹ https://www.legislation.gov.uk/uksi/2012/637/contents/made

- Has opportunities to be actively involved in shaping the emerging Neighbourhood Plan (or Order)
- Is made aware of how their views have informed the draft Neighbourhood Plan (or Order). Reference ID: 41-047-20140306.
- 1.3 Chelmondiston Neighbourhood Development Plan (NDP) has been prepared in response to the Localism Act 2011, which gives parish councils and other relevant bodies, new powers to prepare statutory Neighbourhood Plans to help guide development in their local areas. These powers give local people the opportunity to shape new development, as planning applications are determined in accordance with national planning policy and the local development plan, and neighbourhood plans form part of this Framework.
- 1.4 The Parish Council applied to Babergh District Council (BDC) for the parish to be designated as a neighbourhood area in March 2018. The application for designation was approved by BDC on 23rd March 2018. The neighbourhood area is the same as the Parish boundary and is shown on Map 1.
- 1.5 A steering group comprising Parish Councillors and local residents was established to progress work on the plan. The meetings were held in public and reported back to the parish council and minutes were placed on the NDP pages of the Parish Council website.²
- 1.6 Much of the work on the NDP drew from the Village Development Framework for Chelmondiston & Pin Mill, February 2016.³ This document was prepared through an extensive process of community involvement and engagement from May 2012 to July 2015. The community engagement process included:
 - Public meetings and exhibitions
 - Input from the whole parish community, Parish Council members, Chelmondiston & Pin Mill Community Council, and other local organisations.
 - · Articles in the parish magazine and letters to the entire village
 - Opportunities for all residents to comment through a 'door-drop' questionnaire.
 - Consultation with Babergh District Council (BDC) planning officers.
 - A further door-drop consultation.
 - Presentation of a Draft version of the VDF at Parish Meetings in 2014 and 2015.

A timetable of all public VDF events is shown in Table 1 of the VDF.

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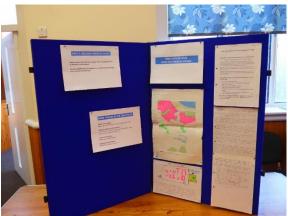
² http://chelmondiston.onesuffolk.net/httpswww-gov-ukguidanceneighbourhood-planning-2/

³ http://chelmondiston.onesuffolk.net/assets/News-items/VDF/VDF-July-2015.pdf

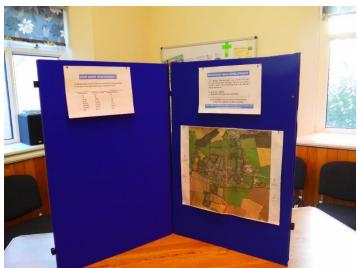
2.0 Informal Consultation on First Draft Plan, March 2019

- 2.1 An informal consultation was held in March/April 2019 on a first draft of the Chelpin Plan. This posed a number of questions about the future of the area.
- 2.2 The Draft Plan placed on the website and printed copies made available in 4 outlets for public view. It was promoted by a leaflet drop to the whole village (see Appendix 1) and a copy was provided on the village noticeboard. A couple of events were held over 3 hours in the Methodist Hall on March 18th, and around 52 people attended see photos below:













- 2.3 A copy of the exhibition is provided in Appendix 1.
- 2.4 Overall, 90 responses were received, and these are summarised below. The responses helped to shape the Regulation 14 Pre-submission Draft of the Chelpin Plan.
- 2.5 During the informal consultation a series of questions were asked and the responses to these questions are summarised below. Numbers in parentheses indicate number of respondents highlighting a particular issue.

RESULTS FROM MARCH 2019 'INFORMAL SURVEY' - 90 REPLIES IN TOTAL

What do you think of the Vision Statement?

- General Support (60)
- Comprehensive but not sure what it is trying to say
- No need to make jobs a target, less worried about appearance of housing, surrounding environment more important
- Not a lot
- Not a vision
- Not grammatically correct
- PinMill shoreline upkeep. Enforcement
- Remove "thriving" could be used to justify endless development
- Resist urbanisation of village and Shotley peninsula
- Should mention development
- Should include sustainability concept
- 'Unique' may be overdoing it!

Future housing development and where should it be?

- Not in AONB (26)
- Small-scale incremental build (26)
- Infill (15)
- Affordable (13)
- Sympathetic to the surroundings (11)
- No more (7)
- No building in RAMSAR or SSSI (7)
- Social housing incl' council housing (6)
- Limited (4)
- Starter and retirement homes 3 room houses for c£150K needed (4)
- No street lights (2)
- High standard of energy efficiency (2)
- Develop only brown fields (2)
- Adequate car parking
- Adjacent Mill Lane, Richardsons Lane, Beside Hill Farm Lane
- Allow for downsizing
- Already too many approved in pipeline
- Any large development should have amenity space
- Build upwards
- Bungalows

- Eco-homes
- Electric charging points
- Enough is enough
- Extend Meadow Close to White House Farm
- Fit with superfast broadband
- Generic brick should be opposed
- High density
- Hill Farm could be sensitively developed
- Hill Farm development sprawl
- Houses at 80% of market value not affordable
- In keeping with surroundings
- Junction main road, beside Meadow Close, not whole area!
- · Less brick and block more timber and weather boarding
- Low density
- Low rise
- Maisonettes
- No development in Conservation Area
- No hi-rise
- No need
- No second homes
- Not estates
- Not executive home
- Not too many big houses
- Only within current village boundary
- Organic
- Protect views
- Retain compactness
- Small terraced houses
- South of main road and east of village
- Traditional pitch roof and materials

Environment?

- More trees (5)
- Hedges (2)
- Conservation of wildlife
- · Development should include wildlife areas
- Encourage bird nesting
- Encourage local area to foster pride
- Enforcement
- Environmentally friendly management of farmland
- Housing in keeping with local styles
- Litter
- Manage footpaths
- No development of agricultural land
- No visual impact on landscape
- Protect AONB
- Recycling

- Resist attempts to classify Chelmondiston as a core village
- Respect open spaces
- Too many heritage assets
- Wildlife needs inter-connected areas

Community Facilities?

- More Play areas (7)
- Need a Post Office (4)
- Youth clubs (3)
- Public toilets on the Playing field (3)
- Footpaths (2)
- Increase use of village hall (2)
- Maintain playing field(2)
- A more visible meeting place
- Art in the Community
- Better promotion of existing facilities
- · Better wheelchair access to local shops
- Box in the commercial rubbish bins at Pin Mill
- Bus shelters
- Café
- · Changing facilities/toilets at playing fields
- Establish a team of helpers with a base to help keep the village tidy
- Holbrook Academy need for expansion?
- More benches to sit on
- Post Office not a planning issue
- Protecting churches not political decisions
- Something for older children eg, skateboard area
- Update sports pavilion
- Value of local shops

Infrastructure?

- Traffic calming/management in village centre + Speeding and safety on B1456 through village (18)
- Bus service (16)
- Doctors (11)
- Better Car parking in village (9)
- Extend school (7)
- Cycling (6)
- Broadband (6)
- Cycleway Ipswich to Shotley (4)
- Improved mobile (3)
- Attracting tourists
- Better car parking in Meadow Close
- By-pass around the village
- Dentist
- Ensure extended High School for children to go on to

- Footpaths in village centre
- Generally fine
- Improve access to sports field
- No need to increase local business
- Pedestrian crossing
- Put cars last create pinch points through village
- Road repairs
- Speed restrictions
- Traffic lights/mini-roundabouts at Woodlands and Pin Mill Lane
- Upgrade the road to 'A' status to ensure better repairs
- Water and electric supply reduce outages

Other comments

- Better communication about the NDP better signposting on the website
- Foresters is a lost opportunity and an eyesore
- Houseboats poor state, enforcement required.
- Need to be advised well in advance on proposed development
- No street lighting
- Pavement outside Methodist Church should be widened unsafe
- Repair village signs
- See houseboats as a positive
- Suffolk being spoilt because not enough thought being given to historical influences, agriculture and natural environment
- Take account of this survey!
- The PC might be taken more notice of (ref' VDF) if it was perceived to be more professional

Outcome: Respondents raised a number of matters that will be incorporated into the Neighbourhood Development Plan. Some of the issues raised are non-land use planning matters and the Parish Council will consider how these issues can be addressed in other ways.

3.0 Regulation 14 Public Consutlation, 18th July 2020 to 1st September 2020

- 3.1 The Draft Plan was published for formal Regulation 14 public consultation for over 6 weeks from 18th July 2020 until 1st September 2020.
- 3.2 The public consultation on the Chelmondiston Draft Neighbourhood Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

Before submitting a plan proposal to the local planning authority, a qualifying body must—

- (a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area:
- (i) details of the proposals for a neighbourhood development plan;
- (ii) details of where and when the proposals for a neighbourhood development plan may be inspected;
- (iii) details of how to make representations; and
- (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;
- (b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and
- (c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.
- 5.3 The Draft Plan and accompanying documents were placed on the Parish Council website:
 - http://chelmondiston.onesuffolk.net/httpswww-gov-ukquidanceneighbourhoodplanning-2/
- 5.4 The public consultation took place during the Covid-19 pandemic and therefore consultation was undertaken in line with Government advice.
- Planning Practice Guidance⁴ sets out the following: 5.5

What changes have been introduced to neighbourhood planning in response to the coronavirus (COVID-19) pandemic?

The government has been clear that all members of society are required to adhere to quidance to help combat the spread of coronavirus (COVID-19). The quidance has implications for neighbourhood planning including: the referendum process; decisionmaking; oral representations for examinations; and public consultation. This planning guidance supersedes any relevant aspects of current guidance on neighbourhood planning, including in paragraphs 007, 056, 057, 061 and 081 until further notice.

Public consultation: The Neighbourhood Planning (General) Regulations 2012 require neighbourhood planning groups and local planning authorities to undertake publicity in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area at particular stages of the process. It is not mandatory that engagement is undertaken using faceto-face methods. However, to demonstrate that all groups in the community have been sufficiently engaged, such as with those without internet access, more targeted methods may be needed including by telephone or in writing. Local planning authorities may be able to advise neighbourhood planning groups on suitable methods and how to reach certain groups in the community.

⁴ https://www.gov.uk/government/collections/planning-practice-guidance

There are also requirements in the Neighbourhood Planning (General) Regulations 2012 that require at some stages of the process for neighbourhood planning groups and local planning authorities to publicise the neighbourhood planning proposal and publish details of where and when documents can be inspected. It is not mandatory for copies of documents to be made available at a physical location. They may be held available online. Local planning authorities may be able to advise neighbourhood planning groups on suitable methods that will provide communities with access to physical copies of documents.

Paragraph: 107 Reference ID: 41-107-20200513

Revision date: 13 05 2020

- 5.6 Public gatherings were not possible, and all communication with the local community had to take place on a remote basis.
- 5.7 Two video-link Question and Answer sessions were held during the consultation period in place of a physical gathering. Details are provided in the two notes below.

Chelmondiston Neighbourhood Development Plan (CNDP) - Chelpin Plan

Meeting: Public Q&A Session – as part of the Regulation 14 Consultation [18th July – 1st

September 2020]

Date: Tuesday, 28th July 2020 [19:03-19.33]

Location: Zoom videoconference

Present: For the Steering Group: 4 members. For the Public: 6 people.

Background

- This meeting was convened to provide the opportunity for members of the Public, as so
 wished, to clarify any points of understanding that they had with the text of the Chelpin
 Plan. Some discussion of the Plan was also included, although significant comments were
 expected to be addressed via the Response Forms available to all, rather than at this
 meeting.
- Due to ongoing COVID-19 restrictions this meeting had to be carried out on a remote basis, rather than physically face-to-face.

Main Outcomes

- Questions were requested and answered on all parts of the Plan, concentrating on the 7
 Objectives as detailed on pages 25-38 of the document.
- One suggestion was recorded to be carried forward: if possible include a record of the recent changes in the number of children under 18, since this cohort is important to the continued life of the village. [Member of the public to include some suggestions in his formal Response.]
- Agreed to submit another entry on Shaun's Shorts by way of a reminder to the Community that they should respond to the Consultation survey.
- Agreed that all Steering Group members should approach at least 3 people to encourage them to respond.

7. Next Meeting

Given the relatively small number of the Public attending the meeting it was agreed that another Zoom Q&A session should be held to provide a further opportunity for public participation.

Date: Tuesday, 18th August, 2020 @ 19:00

Chelmondiston Neighbourhood Development Plan (CNDP) - Chelpin Plan

Meeting: Public Q&A Session – as part of the Regulation 14 Consultation [18th July – 1st

September 2020]

Date: Tuesday, 18th August [19:03-19.35]

Location: Zoom videoconference

Present: For the Steering Group: 3 members. For the Public: 4 people.

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 meeting.
- Due to ongoing COVID-19 restrictions this meeting had to be carried out on a remote basis, rather than physically face-to-face.

Main Outcomes

- There was some discussion about the impact of proposed new planning legislation on Neighbourhood Plans. This is a largely unknown area so need to keep a watching brief on this topic.
- Given the minimal public attendance at these Q&A sessions and the small number (c20) of responses from the public so far, it was agreed that we should do what we can to encourage more public interest during the final 2 weeks of the consultation period, and that:
 - o another e-mail letter should be sent out as a reminder;
 - o hard copies of the Chelpin Plan should be left in key public areas (shops and pubs).
- 5.8 The consultation period was preceded by a door-drop to all households and businesses in the parish on order to:
 - 1) alert the community to the fact that the consultation was about to take place;
 - 2) let them know how to access a copy of the draft Plan;
 - 3) request their views; and
 - 4) inform them how they should communicate those views to the Steering Committee.
- 5.9 In order to further advertise the consultation, posters were placed in all shops and pubs, and messages were posted on the local Facebook group. Towards the end of the consultation period another door drop leaflet was released to both remind and

- encourage people to submit their views. Copies of publicity are provided in Appendix 2
- 5.10 In order to make the draft plan available to all, a downloadable version was placed on the Parish website, and for those unable either to access the electronic version or to read it easily hard copies were made available on request. Towards the end of the consultation period copies of the Draft Plan were also placed in local shops and pubs.
- 5.11 53 Statutory Bodies identified by Babergh DC Planning as required to be consulted were also contacted for their views. A full list of all those contacted is provided in Appendix 2. A copy of the email / letter notifying the various organisations is also provided in Appendix 2.
- 5.12 Responses were invited by written comments, preferably by using one of the comment forms (see Appendix 2 please provide) provided on the web site, and returning these to:
 - By post John Deacon, 1 Anchor Mill Cottage, Main Road, Chelmondiston IP9 1 DP; or
 - By email johndeacon@btconnect.com
- 5.13 By 24:00 on 1st September a total of 152 responses had been received comprising, 9 from Statutory Bodies, 142 from Residential Properties (around 25% of possible responses), and 1 from Businesses.

Summary of Responses

- 5.14 Babergh District Council (BDC) provided a detailed response to the Regulation 14 public consultation on the Draft Plan. The District Council noted that many of their previous suggestions had been taken onboard but also found it necessary to repeat or reinforce others. The Council suggested that further evidence should be provided for some policies and the Steering Group responded to this by providing more evidence about Non designated Heritage Assets, important views and historic trees, woodlands and hederows in Appendices. A summary document of the background evidence, the Planning Policy Assessment and Evidence Base Review is published on the NDP website. The NDP website also has been updated and improved.
- 5.15 A number of minor amendments to policy wording were made in response to officers' comments about recent changes to permitted development and use classes, such as in Policies CNDP2 (g), CNDP3 and CNDP10 (note on the advice of BDC, the policy numbering has also been revised to simply CP and the number).
- 5.16 The mapping has also been improved in the submission version of the NDP. BDC provided some updated and better quality maps and the NDP Policies map (with insets) has been amended and updated in line with officer advice.
- 5.17 Policy CNDP3 was considered overly prescriptive and amendments have been made to improve the grammar and flexibility in response to the comments. The NdHA list has been reviewed thoroughly by the Steering Group, with some proposed assets deleted, including those which on the statutory list (this is now also included as an appendix).
- 5.18 The Local Green Spaces and other open spaces have also been reconsidered and the relevant appendices amended in line with BDC advice. Other policy wording has

- been revised to improve clarity and to update matters in relation to the Presubmission Joint Local Plan which was published in November 2020.
- 5.19 Responses were received from local groups including the Governors at Holbrook Academy, Suffolk Wildlife Trust and Chelmondiston PCC. Holbrook Academy Governors were concerned about the capacity of the school but this was also addressed by Suffolk County Council who advised that there will be sufficient childcare places to accommodate an additional 52 dwellings by 2036. The Wildlife Trust suggested that the SPA and County Wildlife Sites should be mentioned in the Plan and these changes have been made. The PCC objected to one of the Local Green Spaces (a churchyard) but this has been retained in the NDP as the Steering Group considered it still met the criteria in the NPPF.
- 5.20 The Marine Management Organisation noted that the draft South East Marine Plan is of relevance and a reference to this document has been added to the planning policy section of the NDP. Natural England and National Grid submitted standard responses.
- 5.21 Historic England welcomed policy CNDP2 Design Principles and Policy CNDP3 Development within Pin Mill Conservation Area and considered both of these will help guide new development to reinforce positive local distinctiveness. However, they suggested that sub-sections J and K of CNDP2, and B of CNDP3, may be slightly too prescriptive in requiring new extensions or outbuildings to be of a particular architectural style, or to contain 'cottage style' dormers and so changes to policy wording have been made in response to these comments. They were also very pleased to note the inclusion of a list of Non-designated Heritage Assets, and a specific policy to protect them and requested further evidence which has been added.
- 5.22 The Environment Agency noted that there are no comments in the Neighbourhood plan regarding flood risk, or climate change and strongly advised that this be revised as there are some properties in the Pin Mill area that are in tidal flood zone 3a. Some revisions to the supporting text have been made but the NDP does not include site allocations. References were also added in relation to waste water and biodiversity in response to EA's comments.
- 5.23 Suffolk County Council provided a number of detailed and general comments in relation to education provision, surface water / SUDS and health and wellbeing. There were comments about the need to reference the views from the Village Design Statement and supportive comments about the Local Green Spaces as well as advice about improving the biodiversity in Policy CNDP7 which have been taken on board. Various other suggested detailed changes to polciies were considered and many were addressed in the submission plan.
- 5.24 Around 150 residents responded to the consutlation. The majority were very supportive of the NDP. There were suggestions for Non designated Heritage Assets and recreation and community facilities which were considered by the Steering Group and where appropriate included in amendments to the NDP. There were also a large number of suggestions for minor wording changes which have been included in changes to the submission plan. Other issues raised included traffic and parking which were reviewed under the Parish Councils' future actions.
- 5.25 Representations were received from 2 agents/landowners; Savills on behalf of the Landowners of Land north of Main Road, Chelmondiston which put forward a proposed site allocation for housing on Land north of Main Road, and Vistry Group

Chelmondiston NDP Consultation Statement

- which set out objections to various sections and policies in the NDP and promoted a site allocation: land at Hill Farm, Chelmondiston for residential development. However the Parish Council and Steering Group have made the decision that the NDP will not include site allocations.
- 5.26 Complete copies of the Response Tables showing the detailed comments and setting out how the Plan has been amended in response to the representations are provided in Appendix 3.

Appendix 1 - Informal Consultation on First Draft Plan, March 2019

Copy of Door Drop Leaflet

If you would like further information:

Go to the Parish Council Website at

http://chelmondiston.onesuffolk.net/village-news/httpswww-gov-ukguidanceneighbourhood-planning-2/

You will find a complete downloadable copy of the working draft (to date) of the

There is also a lot of relevant information here including minutes of our meetings, which are open to the public by the way.

You can also see full hard copies in print of the draft Plan (to view/read but not to take away) in:

- The Post Office
- Orwell Stores
- Hollingsworths
- Hers and Sirs

There will also be an exhibition about the draft Plan in the

Methodist Chapel Room from 5.00 to 8.00 pm on Monday, 18th March. when members of the Steering Group will be glad to answer any questions and receive any of your co

WE NEED YOUR RESPONSE

So it is crucial that we have your views. Unless we can demonstrate by quoting numbers of comments that there is significant input to the Plan by residents, we will not be able to get it accepted.

So have your say, please, and leave your written co

- At one of the 4 places above, or
 On the Parish Council website response form

Your comments can be anonymous if you don't want to attach your name and contact details - but contact details would be helpful in the event that we need any clarification of your suggestions.

CHELMONDISTON NEIGHBOURHOOD DEVELOPMENT PLAN

What do you want for the future of your village?

We are assuming you are concerned about what happens to this village so this is your chance to say whatever you like towards the future of a Neighbourhood Development Plan. A response form is enclosed with this leaflet for your comments.

This is a first informal consultation with every household in our community, which gives every resident the opportunity to make his or her voice heard.

For instance do you agree with this?

VISION STATEMENT

"To conserve and enhance the unique rural character of the Parish of Chelmondiston, its built and natural assets, and its infrastructure, as a thriving and enjoyable place both for residents and visitors, with particular reference to the need for protection of the Conservation Area at Pin Mill, the AONB status of part of the Parish and its sites of special interest (SSSI and RAMSAR),"

> AONB = Area of Outstanding Natural Beauty SSSI = Site of Special Scientific Interest RAMSAR = protected wetlands

Who are we?

We are the Chelmondiston Neighbourhood Development Plan Steering Group. Rather a mouthful, but we are village residents sponsored by and working under the guidance of the Parish Council.

Read more detail inside...

Why do we want a Neighbourhood Development Plan?

Because this seems the only way in which the residents of this village can exert some control over our own destiny. If and when we get the Plan accepted, it is absolutely mandatory by law that it becomes part of planning policy so that it cannot be overruled by the County or District Councils. And, once accepted, the Parish Council gets an increase in the rate per square meter payable by the landowner/developer, which it can use for our benefit (the Community Infrastructure Levy).

What's happened to the Village Development Framework?

This was sponsored by the Parish Council, and completed in 2016, following a commitment from the District Council that it would be incorporated into their planning framework. It was not. But we are using it as the starting point of the new Plan.

What are we doing?

We are developing a Plan that gives the residents of Chelmondiston and Pin Mill a good deal of statutory control over our environment generally and in particular where and how new developments take place. This is not our Plan to be imposed on the community, but it is your Plan. We are only the guiding and leading hand that seeks to put your views together as a consensus that will get through all the bureaucratic hoops that constrain us. What ever we say has got to be in line with national and local planning policies and regulations, otherwise it will not be accepted. Only if it is accepted, as the combined will of the residents, will it have real validity

The way that we work is laid down by regulation and there are 10 major steps to go through before the final Plan is accepted, including another more formal consultation with you and a referendum. So only if a majority of residents is in favour of the Plan, will it go forward for acceptance. If you want the details of all the steps of the process, these are available on the Parish Council website http://chelmondiston.onesuffolk.net/villageww-gov-ukguidanceneighbourhood-planning-2/

What do you think of the following themes for Chelmondiston/Pin Mill?

These are embryo policies which we are seeking your guidance to develop. When fully formed and after the Plan is accepted they will guide planning

- How much future development? What and where? In principle new houses should be on infill sites or previously developed sites and otherwise on a small scale - single or small groups of houses that relate well to the neighbouring environme There should be no building on Areas of Outstanding Natural Beauty [AONBs], Sites of Special Scientific Interest, [SSSIs] and RAMSARs [protected wetlands]
- Caring for the natural environment. Any developments on the edge of built-up areas should minimise their visual impact on the landscape.
- . What should new buildings look like? They should be well designed, sympathetic to their surroundings, and make a positive contribution to the landscape.
- · What community facilities do we need? We would generally wish to see the enhancement of sports and other recreational facilities.
- What adequate supporting infrastructure do we need? Clearly we need a sustainable mix of homes, local businesses and jobs and other facilities. What else do we need?

Copy of Questionnaire

RESPONSE TO INFORMAL CONSUTATION

Discourse of the form Manual of 20th Manual 2010
Please respond before Monday, 25th March, 2019.
What do you think of the Vision Statement?
How about future building development?
Where do you think it ought to be?
What kind of development?
Do you think we should look after the natural environment? How?
What community facilities are appropriate?
NA/hot cumposting infractaventure do use pood?
What supporting infrastructure do we need?
Anything else you would like to say?(Use another sheet of paper if you wish)
(Optional) Name and contact details:

Copy of Exhibition

WHY A NEIGHBOURHOOD PLAN?

Allows Communities to play a stronger role in shaping the areas in which they live and work.

Increases significantly the amount of money the Community gets from any new developments.

MAIN THEMES IN THE DRAFT PLAN

Future Development

How much, Where, What sort, What should it look like?

Caring for the Natural Environment

What Principles should we adopt; are there specific areas that we need to especially protect?

Community Facilities

How should these develop?

Supporting Infrastructure

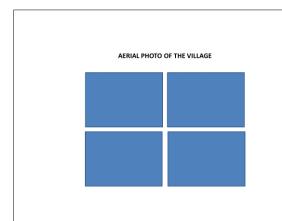
How does this need to develop?

SOME EARLIER IDEAS FROM THE PRIMARY SCHOOL

HOW MANY NEW HOUSES?

Looking ahead 15 years, how fast should the village develop? In 15 years how many new houses should we have?

Extra Houses	% Increase in 15yrs	New houses /year
0	0%	0
15	3%	1
15-30	3-6%	1-2
30-60	6-12%	2-4
60-120	12-24%	4-8
120-240	24-48%	8-16
240-480	48-96%	16-32
480+	96+%	32+



MANAGING NEW DEVELOPMENT

Just suppose... that we have to use a Green Field site to provide the number of houses that are required by our Plan. What criteria should we have in the Plan to help to determine:

- 1. What site is agreed.
- 2. How should the new site be developed.

Some examples of possible sites are shown below to add some reality to the above question.

[These examples are intended to be completely hypothetical and should <u>NOT</u> be seen in any way as proposals or other suggestions.]

SELECTING A SITE

The criteria listed below are included the Plan. Do you agree? Should other criteria be included?

- 1. There should be no building on any area designated as AONB, SSSI or RAMSAR.
- 2. Building should not impact designated significant views.

DESIGNING A SITE

The criteria listed below are included the Plan. Do you agree? Should other criteria be included?

- Buildings will be in keeping with local distinctiveness.
 Building will be well-designed, making a positive contribution to the
- 3. Buildings will minimise intrusion into visually exposed landscapes.
- Buildings will minimise intrusion into visually exposed landscapes.
 Building should be in small groups (or singly) that relate sympathetically with their surroundings.
 The site layout will make positive use of landform, trees and hedges.
 Buildings should be constructed so as to minimise the need for carbon

- Buildings will generally be 2-storeys in height, and with pitched roofs.
- Wildlife habitats must be preserved, and if possible enhanced. Sufficient garden and open green space needs to be provided.
- 10. The number of dwellings included will not have a severe impact the road

NEXT STEPS



Our target is to get to a Referendum by end-2019, but we are very dependent on the speed of progress by others (BDC in particular).

THIS 'INFORMAL CONSULTATION' PHASE **FINISHES ON** Monday, 31st March.

Please let us have any responses before 31/03

Thank you for your participation in this exercise - the Neighbourhood Plan Steering Group

Appendix 2 Regulation 14 Public Consultation

Copies of Publicity

Copy of first door-drop leaflet to all households and businesses

down towards the bottom of the page you will find, "For the latest version of the Plan <u>click here.</u>" and you will be able to download a copy as a PDF file (you will need Acrobat Reader or something similar).

If you are unable or find it difficult to read the plan online, we will deliver a printed copy of the full text to you at home, normally within 5 working days, so you will be able to comment. If you want one, or indeed if you have any questions about the consultation, please contact one of the following:

- John Deacon (Hon. Sec Steering Group), 1 Anchor Mill Cottage, Main Road, Chelmondiston, IP9 1DP. Phone: 01473 780819.
- Jill Davis (Parish Clerk), Michelle, Church Road, Chelmondiston, IP9 1HT. Phone 01473 780159
- Peter Ward (Parish Councillor and Chairman Steering Group), Pinfold, (off) Pin Mill Road, Chelmondiston, IP9 1JE. Phone 01473 780064, mobile 07974 677551

Please make any comments or representations on the attached form – and follow the instructions on it. If you need more sheets, photocopy them, print them from the website or ask one of the 3 people named above.

There will be an **Open Zoom Meeting** which you are invited to attend at **7.00 p.m. on Tuesday, 28th July** at which members of the Steering Group will be available to answer any questions and to discuss any aspect of the draft Plan.

The meeting ID is 837 6544 3019 and the password is 653433 or email robbareham@chelmondistonpc.info for an invitation to click on the link.

Chelmondiston Parish Council Steering Group

STATUTORY CONSULTATION

With all residents, businesses and organisations in the parish <u>From Saturday, 18th July</u> to Tuesday 1st September

On The Chelpin Plan (Legally "The Chelmondiston Neighbourhood Development Plan")

We have a draft plan which has been much worked on and amended, not least by 82 of you as residents of the village just over a year ago. We have also had the benefit of informal comments by Babergh District Council. We are now obliged to list every comment made during this consultation, its source, and the action taken, which might well include amending the plan. If you do not want your comments publicly associated with your name, they can be anonymised ("A Resident" etc.).

This consultation is a legal requirement at this stage (Regulation 14 of the Act) and must last for at least 6 weeks

Normally copies of the plan would be available around the village for anyone to look at but the Covid-19 regulations stop us doing that. And they have been modified to allow us to hold the consultation now.

The draft plan in full is on the parish council's website at https://chelmondiston.onesuffolk.net/httpswww-gov-ukquidanceneighbourhood-planning-2/. If you then scroll

Please turn to back page

Where are we now?

It seems to have been so far a slow, extended, and ponderous process going back to the start in early 2018. However it is quite a bureaucratic, legal process which involves professional consultants to advise us, grants to help the Parish Council pay for it, and a group of (unpaid) people to nurse it into being.

So a Steering Group has been set up as a working party under the Parish Council and has met 10 times so far – though most of the actual work has taken place outside meetings. These are always open to the public and the minutes are all on the Parish Council's website.

The 10 steps required by the Act are listed on the Council's website under Neighbourhood Plan and we are only at Step 3! However this is somewhat like the swan swimming along, apparently effortlessly, and disguises a great deal of work that has been going on under the surface. And we have lost some time as a result of the lockdown starting in March.

We have also passed through two 'screening' legal hoops, which needed a month or two. Babergh District Council have formally determined that our draft Plan does not affect any Habitats (wild-life) in the parish, and that it does not have any significant Environmental effects. Provided that this consultation does not result in any radical changes to the draft we should be able to avoid re-screening and so the next 7 steps should progress rather more quickly. However we are probably looking at least at a further year before the draft is in force.

What is the Chelpin Plan?

A Neighbourhood Plan is a document that sets out planning policies for the neighbourhood area which are used to decide whether to approve planning applications.

- Written by the local community, the people who know and love the area, rather than the Local Planning Authority.
- A powerful tool to ensure the community gets the right types of development, in the right place.
- Neighbourhood planning was introduced in the Localism Act 2011. The Government's wish was to see how local communities would like to manage developments in their own area. It is an important and powerful tool that gives communities statutory powers to shape how their communities develop.

The Vision Statement from the draft Plan

""To conserve and enhance the unique rural character of the Parish of Chelmondiston, its built and natural assets with particular reference to the need for protection of the Conservation Area at Pin Mill, the AONB status of part of the Parish and its areas of special interest (SSSIs and RAMSAR). By 2036 any development will have been sustainable, with the necessary infrastructure resulting in a place that is thriving and enjoyable for residents, local businesses and visitors."

- AONB = Area of Outstanding Natural Beauty
 Section of Section Scientific Interests
 - SSSI = Site of Special Scientific Interest
 - RAMSAR = protected wetlands

Copy of second door drop leaflet



YOUR VILLAGE NEEDS YOU - NOW! Tomorrow may be too LATE

Have Your Say!

The DRAFT NEIGHBOURHOOD DEVELOPMENT PLAN comments are required by 1st September.

SO FAR ONLY 20 RESIDENTS SHOWN AN INTEREST IN THE FUTURE OF CHELMONDISTON

If we do not support the Plan we could end up with numerous large scale developments within the village in the future. If this is what you want then do not read on or take any action! But if you do care about where you live please take the simple step outlined below.

You will have received a copy of the recent document which allows all of us to comment/support the draft Neighbourhood Plan. The level of support or otherwise will feed into the next stage of gaining adoption of The Plan. If you do not take the simple action outlined below Chelmondiston could lose any influence over its future.

I believe the Plan reflects what most of us wish to happen to the village in the future. The hardworking Steering Group, led by Peter Ward with John Deacon as Secretary have done a very good job in accommodating as many views as possible and arriving at a consensus Draft Plan.

The Government's proposed relaxation of planning controls appears to offer some protection to those areas that have created such plans which reflect local views. This is the aim of Chelmondiston's Draft NDP; to determine our own future for the village.

But the plan requires **your** support and it requires it **now!**

If you,

Like Your Village.

Want to avoid large scale Development.

Agree with the Neighbourhood Plan.

Have your say! Send in your support NOW!

You can print it the form at WWW.Chelmondiston.onesuffolk.net/Neighbourhood Plan/RESPONSE FORM Could you please return it before 1 September.

Email it to johndeacon1@outlook.com or send it to

John Deacon 1 Anchor Mill Cottage, Main Road, Chelmondiston IP9 1DP All you need to do is tick the support box

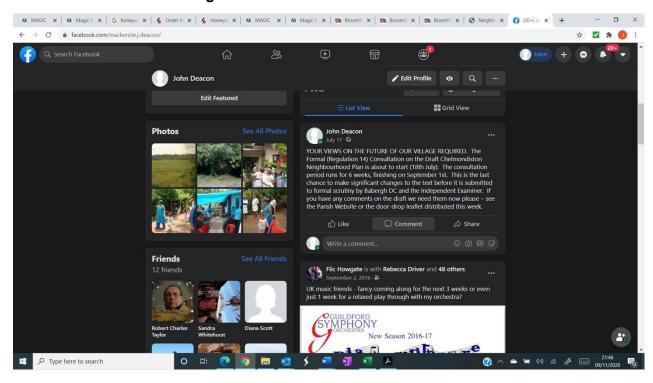
Or, if you cannot find the form, just Send him an email saying that you support the Draft Plan. That is all you need to do! Please do it now! Tomorrow will be too late!

By taking this simple action you will be having YOUR say in the future of YOUR Village

Thank You

Published by John Thomsett, Victory House Shotley Road, Ernall; John, thomsett@me.com

Screenshot of Facebook Page



Copy of Poster

WHAT'S THE FUTURE OF OUR VILLAGE?



Have your say!

The Chelpin Plan can influence future building. It's on the Parish Council's website and a copy can be delivered to you.

What do you think about it?
What do you want the village to be like?

form in the box in Hollingsworth's by Tuesday 1st

September

You can also join a public Zoom Q&A meeting on August 13th at 7PM. Email Robbareham65@gmail.com for the link.

List of Consultees contacted directly

MP for South Suffolk

County Cllr to Peninsula Division, County Cllr to Martlesham Division, Suffolk County Council

Ward Councillors (Orwell, Stour, Ganges)

Ward Councillor Orwell & Villages (East Suffolk Council)

Ward Councillor Orwell & Villages (East Suffolk Council)

Nacton Parish Council

Levington Parish Council

Shotley Parish Council

Erwarton Parish Meeting

Harkstead Parish Council

Holbrook Parish Council

Woolverstone Parish Council

Babergh & Mid Suffolk District Councils

Suffolk County Council

Suffolk County Council

Suffolk County Council

Homes & Communities Agency (HCA)

Natural England

Environment Agency

Historic England

National Trust

Network Rail Infrastructure Limited

Highways England

Marine Management Organisation

Vodafone and O2 - EMF Enquiries

EE (part of the BT Group)

Three

Ipswich & East Suffolk CCG & West Suffolk CCG

National Grid (via Avison Young)

UK Power Networks

Chelmondiston NDP Consultation Statement

Anglian Water

Essex & Suffolk Water

National Federation of Gypsy Liaison Groups

Norfolk & Suffolk Gypsy Roma & Traveller Service

Diocese of St Edmundsbury & Ipswich

Suffolk Chamber of Commerce

New Anglia LEP

New Anglia LEP

RSPB

RSPB

Sport England (East)

Suffolk Constabulary

Suffolk Wildlife Trust

Suffolk Preservation Society

Suffolk Preservation Society

Community Action Suffolk

Community Action Suffolk

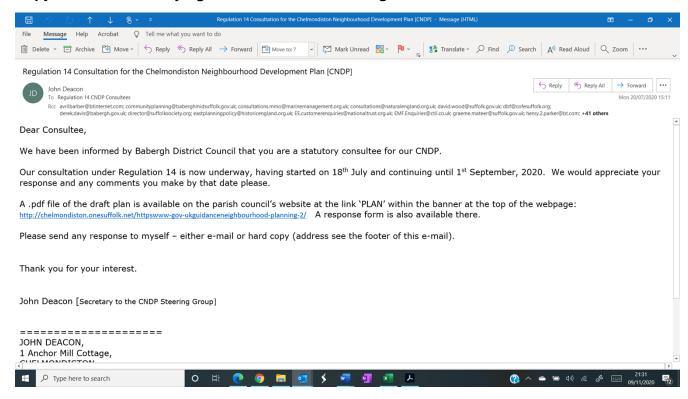
Dedham Vale Society

Suffolk Coast & Heath AONB

The Theatres Trust

East Suffolk Internal Drainage Board

Copy of the Email notifying consultees about the Reg 14 consultation



Copy of Response Form

Office Use Only Consultee No. Representation No.

Chelmondiston Neighbourhood Development Plan

Regulation 14 Consultation Saturday 18 July to Tuesday 1 September ALL RESPONSES MUST BE RECEIVED BY 1 September midnight

Representation/Comment Form

- Please use a separate form for each comment as this helps to analyse and action accordingly and amend the draft plan if appropriate. To be valid, your comments must be in writing.
- If you are making a comment for more than one person, please list all the names.
- If you prefer to use email, please do so and either scan and attach this form or ensure that you provide all the information below.

Name	
Organisation (If applicable) Address	
Address	
Email	
Tel. No.	

Please tell us which part of the Draft Neighbourhood Plan your representation refers to.

Page Number	
Policy Number	

Are you supporting, objecting, or making a comment? (Please indicate with \boldsymbol{X})

Support	
Object	
Making a Comment	

Please turn the page over

Please use the	box below for any comments.	
Please tick if you a		if necessary on another sheet.
□ I also con:	sent to my details being shared with Bab ct me for its consultation under Regulati	_
	put the completed form in the loc	
	Chelmondiston or return direct to ottage, Main Road, Chelmondiston, IP9 1	
Or Email: 10	hndeacon1@outlook.com	
☐ Please tick if y	you do not wish to have your name(s) m ot refer back to you if your comments are	
	Thank you for your time and inte	rest.
	ct details will not be disclosed and will re	

Appendix 3 Regulation 14 Response Tables

Table 1 Babergh District Council
CHELMONDISTON NDP RESPONSES

Our Ref: Chelpin NP R14

Your Ref: E-mail of 20 July 2020

Date: 26 August 2020

Sent by e-mail to:

John Deacon Secretary to CNDP Steering Group

cc: Peter Ward (Chelmondiston PC) & Michael Wellock (Kirkwells)

Dear John, All,

- 1. Chelmondiston [Chelpin] Neighbourhood Plan 2020 2036
- 2. Regulation 14 Pre-submission Consultation

Chelmondiston NDP Consultation Statement

Thank you for consulting Babergh District Council on the Pre-Submission Draft version of Chelmondiston Neighbourhood Plan - the Chelpin

Plan.

The Parish Council / Chelpin Plan Steering Group have been kind enough to share earlier drafts of this Plan with the District Council and we trust

that the informal comments we provided at those times have been helpful. We can see that many of our suggestions have been taken onboard

but we have also found it necessary to repeat or reinforce others. In some cases, we put forward matters not raised previously because time or

circumstance did not allow for that. All are set out in the 'Table of Comments' appended to this letter which represents our formal consultation

response. If any of points raised require further clarity or explanation, please do not hesitate to contact us.

Finally, we reminder the Parish Council that, should they feel it necessary to make further substantive changes, it may be appropriate to re-

consult on those prior to formally submitting the Chelpin Plan and the other required documents to the District Council.

Yours sincerely

Paul Bryant

Neighbourhood Planning Officer / Babergh & Mid Suffolk District Councils

T: 01449 724771 or 07860 829547/ E: communityplanning@baberghmidsuffolk.gov.uk

Sent for and on behalf of Robert Hobbs (Corporate Manager – Strategic Planning)

30

	BBC Response	Recommended PC response
General Comments	Acknowledge and welcome the many changes made. Section 3 now provides a short but helpful overview of the Plan area. Section 4 has been updated to address our earlier concerns about references to incorrect policy, and the use of sectional headings improves navigation through Section 5.	Comment noted. No change.
	 We have given further thought to this and consider it beneficial if the policy numbering system is shortened from 'CNDPx' to 'CPx'. Our software systems have a limit on the number of characters it can assign to a policy reference, the 'CP' more readily translates as 'Chelpin Plan' and, it would also mean that the Policies Map would be easier to annotate and read. 	Amend as suggested.
	 Beyond relying on the Village Development Framework, we repeat our comment about whether there is a need to provide other / appropriate supporting evidence. We suggested a 'Landscape Appraisal', an 'Historic Character Assessment' and/or an 'Important Views Assessment' as examples. 	Further detail has been provided in Appendices in relation to non designated heritage assets and significant views.
	Other references to 'a wide variety of evidence sources' remain. Do not be surprised if your Examiner asks for these to be identified and made publicly available. [See also our comment re para 5.3 further below]	Comment noted. No change. These are available in the Planning Policy Assessment and Evidence Base Review. No change.

	BBC Response	Recommended PC response
Changes to PD Rights and the Use Class Order CNDP2 (g) CNDP3, CNDP10	The Councils Planning Enforcement Team have helpfully provided some useful thoughts on recent changes made by Government that will alter permitted development rights and the Use Class Order. You may already be aware of these through your consultants (Kirkwells) or via other sources. It would be sensible to cross-check the new Regulations with the proposed Policies in this Plan to see if they still have merit or at least make a broad statement to the effect that the Policies apply to those developments that require planning permission.	The additional phrase "Where planning permission is required" should be inserted into policies CNDP2(g), CNDP3 and CNDP10.
	Pertinently the new rights cover building in the airspace above shops and dwellings and replacing light industrial units with dwellings. CNDP2 (g), CNDP3 and CNDP10 would seem to be affected.	Amend policies where required.
	The Town & Country Planning (Use Classes) (Amendment) (England) Reg's 2020 come into force on 1 September 2020. These make a number of changes including the introduction of a new Class E (Commercial, Business and Service) incorporating shops (currently A1), financial and professional services (currently A2), restaurants and cafes (currently A3) and offices (B1). The new Class F1 ('Learning and nonresidential institutions') and F2 ('Local Community') are also created, whilst some uses including those within Classes A4 (Drinking Establishments) and A5 (Hot Food Takeaways) will no longer be covered by the Use Classes Order.	Amend policies and references to use classes where required. Delete CNDP10/7 and CNDP10/8 from Policy CNDP10 and Policies Map.
	CNDP10/7 and CNDP10/8 seek to protect two shops for retail use but retail would fall under the Class E. Commercial, Business and Service use class which would mean that a change of use of the shop to a creche or office would not be development that requires planning permission.	Comment noted. Amend policy to reflect new Use Class E. Local shops can no longer be protected for purely retail use.

	BBC Response	Recommended PC response
Foreword	It will not be necessary for you to include information on how Babergh District Council will undertake its submission draft consultation on this Plan.	Remove this reference.
Contents	Welcome inclusion of a list of policies, maps etc. Perhaps you can look at font sizes, line spacing etc. to see if the contents could appear on one page.	Amend as suggested.
	The reference to, and Section 6 of the Plan will not be needed in the submission draft version.	Delete section 6 and add to Consultation Statement.

	BDC Comment	Recommended PC response
Maps	We will send you better image files for Maps 3a, 3b & 3c (and the Key). [NB: Our work on the next iteration of the Joint Local Plan (JLP) continues and, while not anticipating that any changes have been made since July 2019, there is no harm in including the most up-to-date versions of these maps]	Add better images when available. Replace map 5.

	BDC Comment	Recommended PC response
	A better version of the Conservation Area Map (reproduced as Map 5) may also be available. If we have that that, we will pass it on.	
Figure 1	A reminder to update Figure 1 when you submit.	Comment noted. Update Figure 1 for submission.
Para 1.6	A reminder to update this paragraph when you submit. If retained, it should simply refer to the Reg 14 consultation dates, the number of comments received and, maybe, cross refer to the 'Consultation Statement' which should set in detail all of the comments received and what action(s) you have taken to address the points raised.	Amend as suggested.
Para 2.2	Should read: " by 2036." (not 'in 2036')	Amend as suggested.
Section 3	Para 3.16. Insert a space on second row as follows: " was 491 in"	Amend as suggested
Para 3.10	Para 3.10 should read as last sentence to 3.9. (Subsequent paras to be renumbered).	Amend as suggested
Section 4.0	A reminder that, when the Joint Local Plan is adopted, the Parish Council should be ready to undertake an immediate review of the Chelpin Plan as references made to, for example, Babergh Local Plan policy CS2 will no longer be relevant.	Comment noted. PC to decide if plan should be reviewed in due course. Insert additional text: 'When the Joint Local Plan is adopted, the Parish Council will undertake an immediate review of the Chelpin Plan in order to ensure the NDP remains relevant and up to date.'
Para 4.9	Suggest adding text as follows "These new settlement boundaries are adopted here and are shown on the Policies Map of the Chelpin Plan."	

	BDC Comment	Recommended PC response
Para 5.3	 Combine first and second sentences A range of evidence, including the VDF Last sentence refers to a 'Planning Policy Assessment and Evidence Base Review' document but we could not locate this on the Parish Council Chelpin Plan webpage. Qstn Is this available as stated? If not, please make it available. 	Amend as suggested The document should be added to the NDP website.
Policies Map	As a printed page and on-screen the Policies Map is difficult to interpret. The colours are fine but the overlaying of individual policy reference numbers as black text over (in most case) a black over make them near impossible to read. One solution might be to have a general map of the whole village and then to show two or three more detailed inset maps which would allow for greater clarity. There are plenty of examples in other Neighbourhood Plans were such an approach has been taken. [See also comments under CNDP4, CNDP7, CNDP8 and CNDP9 below]	Amend Policies Map.
Para 5.5	There are some typo's in our previously suggested text which appear to have been replicated here. Delete the word 'in' at the start of the second line and replace the word 'is' with 'are' at the end of the second line so the whole reads as follows: "As well as housing within the village and hamlets, there are a number of house boats on the river at	

	BDC Comment	Recommended PC response
	Pin Mill; adjacent to the Butt and Oyster PH that are part of the distinctive character of the area and provide a unique type of housing	
Para 5.5 and Pin Mill Good Practice Guide	You should be aware that this Council has been promoting the idea of a Pin Mill Good Practice Guide to help manage the houseboat area at Pin Mill. This is a collaborative effort involving relevant partners and agencies. There is not mention of this in the Chelpin Plan which is possibly a lost opportunity to add that finer grain of detail that would bring some of the comments and policies in the Plan to life.	Refer to Good Practice Guide and review policies to see if finer grain policy can be added to Chelpin Plan. "Houseboats owners should familiarise themselves with the GPG available at" This document is currently being prepared and is not yet available on the BDC website.
	Para 5.5 (2 nd & 3 rd bullets) suggests that the general character of the houseboat area (number and appearance) should be maintained and that the Parish Council encourages houseboat owners to maintain their property to a high standard and not to allow this to become a visual or environmental nuisance to neighbouring vessels. **Qstn: Is the benchmark for that high standard the situation as it exists now and how do we measure that over time if it is not recorded? By being specific about what 'good' looks like it is easier to guard against falling standards.	Comment noted. Amend to reflect BDC question about what constitutes "good". This looks like it has already been addressed in the Policy.

	BDC Response	Recommended PC response
CNDP2	 Note the various changes / updates made to this policy over earlier versions. Suggest you may want to think about re-introducing a requirement for improved water efficiency measures as part of criteria (i). The opening sentence could then read: "It includes features to reduce carbon emissions and increase water efficiency. Where such features are proposed" 	Comment noted. Amend as suggested.
Para 5.6	Third line from the end 'pan' should read 'plan'	Correct typo.
CNDP3	We previously suggested that some requirements are unrealistic or not appropriate for all development. The Council Heritage Team have since provided some further thoughts / comments: • Many of the bullet points do not follow on grammatically from	
	the first sentence.	Amend grammar.
	Some of the bullet points are overly prescriptive in terms of the design of new buildings in the Conservation Area that would be supported and highlight criteria (b) as an example. In this case, the Heritage Team is unlikely to adopt an approach this prescriptive when considering applications for new	Amend criteria to make them less prescriptive, qualify reference to pitched roofs, dormer windows and a chimney to be of good quality design.
	development in the Conservation Area. Furthermore, it suggests that if a new building has a pitched roof, dormer windows and a chimney it would be appropriate for the Conservation Area. There is no guarantee that, if these features are used, the design would be appropriate. This would include these features themselves being inappropriate. Dormer windows especially are often poorly designed and/or located in new developments.	Look at EH response - contemporary

	BDC Response	Recommended PC response
CNDP4 and para 5.9	We have found it necessary reiterate our previous informal comments on this policy.	
	The inclusion of a local list of non-designated heritage assets (NdHAs) is welcome in principle. However, the lack of any reference, other than the statement in para 5.9 that these have been identified by the Steering Group, to the criteria used to assess these is something that will need to be addressed before the Plan can be submitted.	Improve evidence base for non-designated heritage assets and include as an Appendix. Based on document sent. Provided in appendix
	We have previously directed you to an example where an NP Group include an assessment table in their Plan. We recommend that you revisit that and see also what other Groups have done. Note also that a lack of supporting evidence may get picked up at	

BDC Response	Recommended PC response
Examination. Only very recently, the Examiner of the Thorndon NP asked: "is there is a document in the public realm that explains the criteria used to select the Buildings of Local Significance listed in Appendix 2 to the Plan."	See comment above.
The more justification provided, the more scope the Councils Heritage Team would have for reinforcing this identification during any application. A Supporting Evidence documents will also provide a good opportunity to include images of the said buildings and to draw attention to any aspect of these building's historic interest that may not otherwise be accessible to the Councils Heritage Team / Planning Officers.	See comment above.
Mapping	
The identification of these NdHAs on the ground is difficult. They are shown on the Policies Map but the scale of the map is insufficient to be able to ascertain exactly which building is indicated. Also, it does not appear that all 14 buildings are actually plotted. We suggest that a more detailed / accurate map is produced. This could also link through to the justification evidence mentioned above, i.e. maybe an annotated map / site plan map with the name of each building and/or a photograph included to show the building in question. [See also our separate comment about the Policies Map]	Include more detailed maps in Appendix.

BDC Response	Recommended PC response
NdHA or not?	
From the information on these buildings that we have been able to find, some appear questionable as to whether they warrant identification as NdHAs and/or it is not clear exactly what is covered by the identification (see below), although the inclusion of further information on their significance may justify inclusion:	
CNDP4/3 - Longwood Cottage appears to be nationally listed, at Grade II (as 6 and 7 Richardsons Lane). Providing that this is the same building (see point above) it should therefore not be listed as a NdHA	Remove if listed.
CNDP4/9 - The Former Riga Public House. From the photographs we have been to find of this building, it does appear to have had considerable recent external alteration that may well have eroded its historic character perhaps too much to be considered a NdHA. Again, a summary of significance may help justify its inclusion.	Evidence base to be reviewed – if not considered to merit protection – remove from list.
CNDP4/10 - Naedan Lodge. It appears that this relates to a house granted planning permission in 2007. It is very unlikely that a building this new would have sufficient historic value to be considered a NdHA by the Councils Heritage Team. It could however be included in a separate list of good new design in the parish, if that is the reason for its inclusion.	Remove from list.
CNDP4/12 - King's Boatyard. We are not sure if this relates to any particular building and/or rather an area of land, and if	

BDC Response	Recommended PC response
the latter, what extent of land. It would also be particularly relevant to explain what makes this worthy of identification – certain physical structures, the activities that occur on the site or a bit of both/something else.	
If a set list of criteria is drawn up for identifying NdHAs and applied to the parish, more buildings may well be identified.	Evidence base to be reviewed.

	BDC Response	Recommended PC response
CNDP5 and para 5.12	We provide some further thoughts based on our previous informal comments:	
	 Note that Dawn Covert and Bylam Common have been deleted following our suggestion these sites do not meet the NPPF criteria. See also that Pages Common is retained. 	Comments noted.
	CNDP5/2 - Cliff Plantation (or CP5/2 if the new policy numbering is adopted) still appears visually as an 'extensive tract of land'. This may ultimately be a judgement call made by the Examiner. We suggest leaving it as is for now.	Comment noted. No change.
	The opening sentence could simply read: "The following Local Green Spaces are designated in this Plan and are shown on the Policies Map:"	Amend as suggested.
	The last paragraph could be worded better. We suggest: "Development on these sites will only be permitted in very special circumstances. Permitted development rights, including the operational requirements of infrastructure providers, are not affected by this designation." [NB: Text is from already examined / adopted NPs]	Disagree. This comment misinterprets national planning policy. Only inappropriate development requires to be justified by very special circumstances – some development is appropriate under national Green Belt policy.
	 Appendix 1, despite the inclusion of explanatory text on page 40, is still confusing. Table A1 comprise an analysis of both Local Green Space (CNDP5) and Sport & Recreation Facilities (CNDP9). These are jumbled together and the ordering does not readily translate to how the chosen sites are listed in their 	Split into two tables.

BDC Response	Recommended PC response
respective policies. The break in the table at page 42 does not help either.	
We suggest a small adjustment to the last sentence so that it reads: "Once designated, Local Green Spaces have the same planning status as Green Belt. As worded, Policy CNDP5 does not prevent development from coming forward that is essential to those sites."	Amend as suggested.

ONDE	144 (41 141 141 141 141 141 141 141 141	
CNDP6 and para	We previously commented that this policy might be interpreted as a blanket or	Name open spaces in policy.
5.13	restrictive policy on all other green spaces	Amend Table A2.
3.13	within the identified settlement boundary.	
	The policy itself does not specifically name any 'small open spaces' but a	
	number of these do appear on the	
	Policies Map. We have not checked them	
	all but, presumably, these cross-refer to Table A2. If this Plan seeks to give some	
	protection to other small open spaces,	
	they should be identified in the policy as	
	well.	
	Note also that Table A2 suffers from the	
	same 'break' issue mentioned above. This	
	should be a relatively straightforward re-	
CNDP7	formatting issue. We made a number of informal	See below.
CNDP1	comments on this policy before and find	See below.
	it necessary to repeat some of those	
	below. Some of our comments are new.	
	For convenience, all are shown	
	individually:	
CNDP7 (c)	It would be useful if the Plan could	Identify historic / ancient woodland in an appendix.
	identify areas of historic local woodland that are of importance, or possibly	
	providing a bit more information on what	
	is an historic woodland? Presumably,	
	one established before a given date,	
	perhaps pre-1900?	
CNDP7 (d)	The paragraph starts with "Conserving in	Amend as suggested.
	situ known archaeological sites" but then goes on to note that remains could	
	be "recorded or conserved in situ".	
	So rootada di dollocivea ili dita	

	Subject to any comment made by Suffolk County Council on this, we suggest the paragraph starts with "Where possible conserving in situ"	
CNDP7 (g) and para 5.14	The six significant views are not shown on the Policies Map as stated. Also, as mentioned before, there is no evidence / justification provided for the inclusion of these views. Both issues must be addressed before the Plan is submitted. The justification should capture what is so special about those views, which should also be from publicly accessible locations. Amend Policies Map – beef up evidence for the identified views. Insert into Appendix 4.	
	Qstns: What does 'taking account of the impact mean? How will this be measured and what guidance is provided for both applicant and planning case officer? The para seeks to take account of the impact of development on the significant views listed, but do you want to go further and conserve and enhance? Amend policy to take account of this question. Amend policy to take account of this question.	
	 Para 5.14 retains the reference to Figure 6 that appeared in earlier versions of this Plan. Either remove the reference or include Figure 6. Either way, the views must be shown / be identifiable on the Policies Map. Add views to Policies Map or provide on new map. Add views to Policies Map or provide on new map.	

CNDP7 (h)	We repeat our earlier informal comment What does this mean in practice?	Delete criterion (h).
CNDP8	We previously suggested that 'Public Houses be removed from the policy title and be included instead as one of the 'such as' examples at the end of the first paragraph. We see that the policy remains unaltered but make no further comment.	Remove public houses from policy title – review policy in light of changes to Use Classes referred to above.
	 It has since been suggested that the inclusion of 'Local Shops' in the policy title is misleading as they are dealt with under CNDP10. We will let the NP Group come to their own view on 	Remove local shops from policy title – review policy in light of changes to Use Classes referred to above.
	that.	Comment noted – no change.
	 Similarly, it has been suggested that matters relating to religious and school buildings are also out of our hands. Suffolk County Council may wish to comment on the latter. 	Improve Policies Map.
	 See also our earlier comment about the Policies Map and making it easier to identify the listed facilities. 	
CNDP9	The numbers attached to these sites on the Policies Map are difficult to read.	Improve numbering on Policies Map.
Para 5.16	Second line. Grammatically, it should read 'three', and not '3'	Amend as suggested.
CNDP10	See also comments at the start about Changes to PD Rights / Use Class Order	See above on Use Classes changes.
	The second paragraph refers to 'substantial construction' and ends with	

'lead to road traffic impacts'. We suggest that:	
'substantial construction': If it is structural integrity, use wording in line with Class Q applications and state "'structurally sound supported by a structural report as needed."	Amend as suggested.
• 'lead to road traffic impacts': It may be difficult to quantify when there is a road traffic impact. Suggest referring to wording of para 109 of NPPF: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." This is likely what SCC Highways would refer to when considering an application for highway impact. In their formal response, Suffolk County Council may also have something further to say on this matter.	Amend as suggested.

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para 5.17 and para 5.19	We suggest merging para 5.19 with last sentence of 5.17 so that it reads as follows: "Policy CNDP10 also seeks to protect the area's two existing local retail units which contribute to the economy and wider life of the village as they also provide places where people can meet."	Amend as suggested.
Appendix 1	There are some typos here which you may already have identified:	Amend typos.
	 End of first sentence. " Following stages: Stage 1: Identification of [See also our comments under CNDP5 and CNDP6 above]. 	

[Ends]

Table 2
Consultation Bodies and other Organisations
CHELMONDISTON NDP RESPONSES

Reference	Respondent	Comment Summary	Suggested response
R088	Governors Holbrook Academy	As chair of Governors at Holbrook Academy (as well as a resident of Chelmo) I would like to comment that the school is now at full capacity and to ask that the limit space is an issue to be considered with any new house building on the peninsula. There are a large number of proposed housing developments - big and small - across the peninsula, and no consideration for the consequences for high school provision.	See SCC comment. No change.
STAT-03-1	Suffolk Wildlife Trust	Add reference to Stour and Orwell Special Protection Area.	Add reference to SPA at appropriate points in plan.
STAT-03-2	Suffolk Wildlife Trust	CNDP7 should reference the mitigation hierarchy to deliver biodiversity net gain.	Add reference to mitigation hierarchy to CNDP7.
STAT -03- 3	Suffolk Wildlife Trust	Part of two County Wildlife Sites are within the neighbourhood area. These are non-statutory locally designated sites. They should be included in the plan and protected from development.	Add the two County Wildlife Sites to the plan.
STAT-04	Chelmondiston PCC	Objects to St Andrews Churchyard being designated local green space and the Old School Site. Churchyard has no public access other than by permission of PCC. Designation of Old School Site "ties" PCC's hands for future use.	Not accepted. Public access is not one of the criteria in the NPPF for LGS. Refer to appendix 1 Table A1 for justification.

Reference	Respondent	Comment Summary	Suggested response
STAT-05	Suffolk CC	Support	Support noted.
STAT-05 STAT-06	Marine Management Organisation	As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the draft South East Marine Plan is of relevance. The draft plan was published for public consultation on 14th January 2020, at which point it became material for consideration. The South East Marine Plan cover the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the draft South East Marine Plan, or the UK Marine Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.	Add reference to MMO's licensing requirements and marine plans.

Reference	Respondent	Comment Summary	Suggested response
		The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area . The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters. The marine licensing team are responsible for consenting and regulating any activity that occurs "below mean high water springs" level that would require a marine li activities can range from mooring private jetties to nuclear power plants and offshore windfarms. Summary notes Please see below suggested policies from the Draft South East	
		Inshore Marine Plans that we feel are most relevant to your neighbourhood plan. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East Marine Plan is completed: • SE-INF-1: Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. • SE-CO-1: Proposals that optimise the use of space and incorporate opportunities for co-existence and co-operation with existing activities will be supported. Where potential conflicts with existing activities are likely (including displacement) proposals must demonstrate that they will, in order of preference: a) avoid b) minimise	
		 c) mitigate significant adverse impacts on existing activities (including displacement) 	

Reference	Respondent	Comment Summary	Suggested response
		d) if it is not possible to mitigate significant adverse impacts	
		on existing activities (including displacement), proposals	
		should state the case for proceeding.	
		 SE-PS-1: Only proposals demonstrating compatibility with current 	
		activity and future opportunity for sustainable expansion of port and	
		harbour activities will be supported. Proposals that may have a	
		significant adverse impact upon current activity and future opportunity	
		for expansion of port and harbour activities must demonstrate that	
		they will, in order of preference: a) avoid	
		b) minimise	
		c) mitigate significant adverse impacts	
		d) if it is not possible to mitigate significant adverse	
		impacts, proposals should state the case for proceeding.	
		 SE-HER-1: Proposals that demonstrate they will conserve and 	
		enhance elements contributing to the significance of heritage assets	
		will be supported. Proposals unable to conserve and enhance	
		elements contributing to the significance of	
		heritage assets will only be supported if they demonstrate that they	
		will, in order of preference: a) avoid	
		b) minimise	
		c) mitigate harm to those elements contributing to the	
		significance of heritage assets	
		d) if it is not possible to mitigate, then public benefits for	
		proceeding with the proposal must outweigh the harm to the	
		significance of heritage assets.	
		SE-SCP-1: Proposals that may have a significant adverse impact	
		upon the seascapes and landscapes of an area should only be	
		supported if they demonstrate that they will, in order of preference: a) avoid	
		b) minimise	
		c) mitigate	

Reference	Respondent	Comment Summary	Suggested response
		d) if it is not possible to mitigate, the public benefits for	
		proceeding with the proposal must outweigh significant	
		adverse impacts to the seascapes and landscapes of an	
		area. Where possible, proposals should demonstrate that	
		they have considered how highly the seascapes and	
		landscapes of an area is valued, its quality, and the areas	
		potential for change. In addition, the scale and design of the	
		proposal should be compatible with its surroundings, and not	
		have a significant adverse impact on the seascapes and	
		landscapes of an area.	
		• SE-EMP-1: Proposals that result in a net increase to marine related	
		employment will be supported, particularly where they meet one or	
		more of the following: i) create employment in areas identified as the	
		most deprived, or ii) support and are aligned with local skills	
		strategies and the skills available in and adjacent to the south east	
		inshore marine plan area, or	
		iii) create a diversity of opportunities, or iv) implement new	
		technologies.	
		SE-CC-1: Proposals which enhance habitats that provide flood	
		defence or carbon sequestration will be supported. Proposals that may	
		have significant adverse impacts on habitats that provide a flood	
		defence or carbon sequestration ecosystem service must demonstrate	
		that they will, in order of preference: a) avoid	
		b) minimise	
		c) mitigate significant adverse impacts, or, as a last resort,	
		d) compensate and deliver environmental net gains in line	
		with and where required in current legislation.	
		SE-WQ-1: Proposals that enhance and restore water quality will be	
		supported. Proposals that cause deterioration of water quality must	
		demonstrate that they will, in order of preference: a) avoid	
		b) minimise	

Reference	Respondent	Comment Summary	Suggested response
		c) mitigate deterioration of water quality in the marine	
		environment.	
		• SE-ACC-1: Proposals demonstrating appropriate enhanced and	
		inclusive public access to and within the marine area, and also	
		demonstrate the future provision of services for tourism and recreation	
		activities, will be supported. Where appropriate and inclusive	
		enhanced public access cannot be provided, proposals should	
		demonstrate that they will, in order of preference: a) avoid	
		b) minimise	
		c) mitigate significant adverse impacts on public access.	
		• SE-TR-1: Proposals that promote or facilitate sustainable tourism	
		and recreation activities, or that create appropriate opportunities to	
		expand or diversify the current use of facilities, should be supported.	
		Where proposals may have a significant adverse impact on tourism and recreation activities they must demonstrate that they will, in order	
		of preference: a) avoid	
		b) minimise	
		c) mitigate that impact.	
		• SE-SOC-1: Those bringing forward proposals are encouraged to	
		consider and enhance public knowledge, understanding, appreciation	
		and enjoyment of the marine environment as part of (the design of) the	
		proposal.	
		• SE-MPA-1: Proposals that support the objectives of marine protected	
		areas and the ecological coherence of the marine protected area	
		network will be supported. Proposals that may have adverse impacts	
		on the objectives of marine protected areas must demonstrate that	
		they will, in order of preference: a) avoid b) minimise c) mitigate	
		adverse impacts, with due regard given to statutory advice on an	
		ecologically coherent network.	
		• SE-BIO-1: Proposals that enhance the distribution of priority habitats	
		and priority species will be supported. Proposals that may have	

Reference	Respondent	Comment Summary	Suggested response
Reference	Respondent	significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate d) compensate for significant adverse impacts. • SE-BIO-2: Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration will be supported. Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts d) compensate for significant adverse impacts. • SE-CBC-1: Proposals must consider cross-border impacts throughout the lifetime of the proposed activity. Proposals that impact upon one or more marine plan areas or impact upon terrestrial environments must show evidence of the relevant public authorities (including other countries) being consulted and responses considered.	ouggested response
		Further points to note Section 4 Planning Policy Context, you refer to the NPPF and Babergh planning policy, we would also recommend you mention the <u>draft</u> South East Marine Plan here.	Add reference to draft SEMP in Section 4.
STAT-01	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.	Comment noted. No change.

Reference	Respondent	Comment Summary	Suggested response
		Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this draft neighbourhood plan.	
STAT-02	Avison Young on behalf of National Grid	National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.	Comments noted. No change.

Reference	Respondent	Comment Summary	Suggested response
		National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.	
STAT-07	Historic England	We welcome the production of this neighbourhood plan, and are pleased to see it contains references to the local historic environment of your parish throughout. In particular, we welcome the policies it contains on design; conserving the character of the Pin Mill Conservation Area and; protecting non-designated heritage assets. We would like to offer the following brief advice on your plan:	Supporting comments noted.
		We welcome policy CNDP2 - Design Principles and Policy CNDP3 – Development within Pin Mill Conservation Area. We consider that both of these will help guide new development to reinforce positive local distinctiveness. However, we would suggest that sub-sections J and K of CNDP2, and B of CNDP3, may be slightly too proscriptive in requiring new extensions or outbuildings and to be of a particular architectural style, or to contain 'cottage style' dormers etc.	Re-word relevant sections of CNDP2 and 3 to allow for innovation. Correct typo.
		The reason for this is that the National Planning Policy Framework (2019) does allow for an element of innovation in the design of new buildings. Some of the best new developments are not those that attempt to replicate historical styles, but use locally distinctive materials or forms in new and interesting ways. It should be noted also that some of the most interesting historic buildings are palimpsests that exhibit multiple 'styles'. These policies as presently worded may inadvertently prohibit contemporary styles that nonetheless complement existing buildings or contribute positively to local distinctiveness and add to the character of your area. Historic England considers that good quality contemporary design is preferable to pastiche in historic places. We also highlight that the end of CNDP2 'K' ends with 'and' and then goes no further, which we presume is a minor typo.	

Reference	Respondent	Comment Summary	Suggested response
		We are very pleased to note the inclusion of a list of non-designated heritage assets, and a specific policy to protect them. In order to ensure that these assets are robustly protected, we would suggest adding an appendix to your plan that lists these assets, perhaps including them in a table with a photograph. This appendix should set out the precise reasons they have been identified against the criteria you list in the Policy's supporting text. We would suggest reviewing our Advice Note 7 - Local Heritage Listing for further advice on ensuring that nominations for locally listed heritage assets are robustly justified as part of your plan.	Consider adding Appendix of non- designated heritage assets as suggested.
		Overall, we consider that this neighbourhood plan has a positive strategy towards the historic environment in the parish, and besides those minor comments, we welcome its production and commend the efforts of those involved.	
STAT-08	Environment Agency	Flood Risk There are no comments in the Neighbourhood plan regarding flood risk, or climate change. We strongly advise that this is revised as there are some properties in the Pin Mill area that are in tidal flood zone 3a. to our general flood risk comments below although we acknowledge that there are no areas proposed for development in the plan. We recommend that the sequential test is applied to development proposals to direct development to sites with the lowest risk of flooding. We have no capital projects planned in Chelmondiston as there are few properties at risk. General Flood Risk Comments	Add references to flood risk. Sequential test would be applied if sites were to be allocated. Chelpin does not allocate sites.

Reference	Respondent	Comment Summary	Suggested response
		All development proposals within the Flood Zone (which includes	Comment noted.
		Flood Zones 2 and 3,as defined by the Environment Agency) shown	Chelpin does not
		on the Policies Map and Local Maps, or elsewhere involving sites of	allocate sites. No
		1ha or more, must be accompanied by a Flood Risk Assessment.	change.
		Planning Practice Guidance	
		The Neighbourhood Plan should apply the sequential test and use a risk based approach to the location of development. The plan should be supported by the local Strategic Flood Risk Assessment (SFRA) and should use the NPPF Planning Practice Guidance (PPG). The PPG advises how planning can take account of the risks associated with flooding and coastal change in plan-making and the planning application process. The following advice could be considered when compiling the Neighbourhood Plan to ensure potential development is sequentially sited or if at flood risk it is designed to be safe and sustainable into the future.	Comments noted. Chelpin does not allocate sites. No change.
		Sequential Approach	
		The sequential approach should be applied within specific sites in order to direct development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. If the whole site is at high risk (Flood Zone 3), an FRA should assess the flood characteristics across the site and direct development towards those areas where the risk is lowest.	Comments noted. Chelpin does not allocate sites. No change.
		Finished Floor Levels	
		We strongly advise that p floor levels set no lower than 300 mm above the level of any flooding that would occur if defences were	Comment noted. This is a matter for detailed

Reference	Respondent	Comment Summary	Suggested response
		overtopped in a 1% / 0.5% flood event (including allowances for climate change). Safe refuge should also be provided above the 0.1% undefended/breach flood level (including allowances for climate change). We are likely to raise an objection where these requirements are not achieved. If this is not achievable then it is recommended that a place of refuge is provided above the 0.1% flood level (including allowances for climate change). Where safety is reliant on refuge it is important that the building is structurally resilient to withstand the pressures and forces (hydrostatic & hydrodynamic) associated with flood water. The LPA may need to receive supporting information and calculations to provide certainty that the buildings will be constructed to withstand these water pressures.	design at planning application stage.
		During a flood, the journey to safe, dry areas completely outside the 1% (1 in 100) / 0.5% (1 in 200) AEP flood event, including allowances for climate change, should not involve crossing areas of potentially fast flowing water. Those venturing out on foot in areas where flooding exceeds 100 millimetres or so would be at risk from a wide range of hazards, including, for example; unmarked drops, or access chambers where the cover has been swept away. Safe access and egress routes should be assessed in accordance with the guidance document ance We would recommend that you refer to your SFRA which has produced hazard maps following a breach/overtopping of the defences?	Comments noted. Chelpin does not allocate sites. No change.
		Emergency Flood Plan	Comments noted. Chelpin does not

Reference	Respondent	Comment Summary	Suggested response
		Where safe access cannot be achieved, or if the development would be at residual risk of flooding in a breach, an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. As stated above refuge should ideally be located 300mm above the 0.1% AEP flood level including allowances for climate change. An emergency flood plan should be submitted as part of a FRA for any new development and it will be important to ensure emergency planning considerations and requirements are used to inform it.	allocate sites. No change.
		Flood Resilience / Resistance Measures To minimise the disruption and cost implications of a flood event we encourage development to incorporate flood resilience/resistance measures up to the extreme 0.1% AEP climate change flood level.	Comments noted. Chelpin does not allocate sites. No change.
		Information on preparing property for flooding can be found in the documents and	
		Increases in Built Footprint (excluding open coast situations) When developing in areas at risk of flooding consideration should be given to preventing the loss of floodplain storage. Any increase in built footprint within the 1% AEP, including allowances for climate change, flood extent will need to be directly compensated for to prevent a loss of floodplain storage. If there are no available areas for compensation above the design flood level and compensation will not be possible then a calculation of the offsite flood risk impacts will need to be undertaken. If this shows significant offsite impacts then no increases in built footprint will be allowed. Further guidance on the provision of compensatory flood storage is provided in section A3.3.10 of the CIRIA document C624.	Comments noted. Chelpin does not allocate sites. No change.

Reference	Respondent	Comment Summary	Suggested response
		Climate Change The Environment Agency guidance 'Flood risk assessments: climate change requirements of Flood Risk Assessments (FRA) for individual applications.	Comments noted. Chelpin does not allocate sites. No change.
		The National Planning Practice Guidance provides advice on what is considered to be the lifetime of the development in the context of flood risk and coastal change. The 'Flood risk assessments: climate change allowances' guidance provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk. For some development types and locations, it is important to assess a range of risk using more than one allowance. Please refer to this guidance. https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances. This advice updates previous climate change allowances to support NPPF and may result in flood extents being greater than they have been in the past. This does not mean our flood map for planning has changed, as these maps do not consider climate change, but fluvial flood maps that may have been produced as part of SFRAs and other flood risk studies may be out of date. FRAs submitted in support of new development will need to consider the latest climate change allowances. Environmental Permit for Flood Risk Activities	Comments noted. Chelpin does not allocate sites. No change.

Reference	Respondent	Comment Summary	Suggested response
		An environmental permit for flood risk activities may be required for work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert.	
		Application forms and further information can be found at: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits. Anyone carrying out these activities without a permit where one is required, is breaking the law.	
		The Neighbourhood Plan should consider this when allocating development sites	
		work as a result in order to ensure the development does not have a detrimental impact upon the environment and flood risk. <u>Water Quality</u>	
		Foul and waste water	
		In its draft form, the neighbourhood plan makes no attempts to discuss foul wastewater infrastructure or identify any potential issues with local sewerage infrastructure. The neighbourhood plan is a good place to highlight the standard practise that, where possible, any new developments in the area should be encouraged to initially investigate connection for waste water, from new sites, to go into the mains foul sewer network. It would be useful for the plan to also acknowledge the importance of early consultation with the local sewerage undertaker, in this case Anglian Water, to allow for adequate planning of waste water infrastructure within the parish. Assessing where the existing foul sewer network serves the parish can be a useful tool, for early planning, for the location of new houses and developments to ensure,	Add reference to wastewater infrastructure as suggested to Objective 7 and supporting text.

Respondent	Comment Summary	Suggested response
	if possible, they are within close proximity to the existing foul sewer. Maps of the existing foul sewer network for the parish can be provided from AWS.	
	Given no large or significant development is planned for this area we have no significant concerns, but a general acknowledgement of the current foul wastewater infrastructure would be worthy of mention in the neighbourhood plan. It is good practise to show that wastewater infrastructure is being considered at all levels of the planning process.	
	Chelmondiston water recycling centre (WRC) is the local sewage works serving the parish. This is currently at around 80% of its permitted capacity, having room for approximately 100 dwellings, so early planning and consultation with Anglian Water will be essential to ensure any infill development is planned sustainably so not to overload existing infrastructure.	
	We suggest that the content above would be a well suited and welcomed edition to the CNDP OBJECTIVE 7 -To ensure that the area has appropriate levels of infrastructure section.	
	Environmental legislation	
	We welcome that the neighbourhood plan acknowledges the need for respecting and protecting the local environment in the Landscape and Environment section. This section could be strengthened by referencing statutory environmental legislation which is in place to protect various aspects of the environment. Any key statutory objectives of the relevant legislation should be acknowledged here and links made to sustainable development. For example the	Add references to legislation as suggested.
	Respondent	if possible, they are within close proximity to the existing foul sewer. Maps of the existing foul sewer network for the parish can be provided from AWS. Given no large or significant development is planned for this area we have no significant concerns, but a general acknowledgement of the current foul wastewater infrastructure would be worthy of mention in the neighbourhood plan. It is good practise to show that wastewater infrastructure is being considered at all levels of the planning process. Chelmondiston water recycling centre (WRC) is the local sewage works serving the parish. This is currently at around 80% of its permitted capacity, having room for approximately 100 dwellings, so early planning and consultation with Anglian Water will be essential to ensure any infill development is planned sustainably so not to overload existing infrastructure. We suggest that the content above would be a well suited and welcomed edition to the CNDP OBJECTIVE 7 -To ensure that the area has appropriate levels of infrastructure section. Environmental legislation We welcome that the neighbourhood plan acknowledges the need for respecting and protecting the local environment in the Landscape and Environment section. This section could be strengthened by referencing statutory environmental legislation which is in place to protect various aspects of the environment. Any key statutory objectives of the relevant legislation should be acknowledged here

Reference	Respondent	Comment Summary	Suggested response
		Framework Directive (WFD), Habitats directive and the local water environment, particularly the Orwell Estuary; parts of which are designated important protected areas such as a SSSI, SAC and SPA. The two principal requirements of the WFD are that development activities within the neighbourhood must not lead to a deterioration of the water environment and opportunities should be taken to improve river status where possible.	
		The plan should highlight important local environmental information relevant to the parish to provide a baseline for planning sustainable development much of this information can be found on the .gov.uk website or the Catchment Data Explorer. This baseline information should then be linked in the plan to the importance of ensuring that no deterioration in the local (water) environment occurs as a result of development pressures within the parish. A map in this section would be a useful tool to visually reflect this baseline information showing the parish location with regards to local watercourses and protected designations.	Add information and links as suggested.
		Ecology	
		The Plan shows good local biodiversity knowledge, which will support understanding of potential impacts that any development may have, whilst also providing a good baseline from which enhancements can be made.	
		Further to the planting of native species and conserving existing features, within Objective 4, the following enhancements could be considered and added: Wildflower verges,	

Reference	Respondent	Comment Summary	Suggested response
		Creating designated Local Wildlife Sites. Supporting, where location allows, protected species such as water vole, bat, and	Review Objective 4 and revise in light of these
		reptiles, Use local materials and soils where possible,	comments.
		Using soft rather than hard engineering techniques, Preserve and enhance the mudflat habitat along the river, preventing too much pressure being applied to them from either development or recreation, Potential for the creation of wet woodland along the shoreline, Retention of mature trees, in particular, as they often provide the greatest habitat and species diversity.	Text added to 5.16 as examples of biodiversity net gain.
		Regarding development, either planned or existing, along the river edge, Natural England can provide further detail on the current status and threats posed to the designated sites. Further information can also be found here https://designatedsites.naturalengland.org.uk/ (under Stour and Orwell Estuaries (Ramsar) / Orwell Estuary (SSSI) / Stour and Orwell Estuaries (SPA)).	
		If any watercourse crossings are required, culverts should not be default. It is important to maintain natural form and function of watercourses to maintain and allow when culverts are built which has resultant effects on ecology.	
		If land types allow, reconnecting the floodplain to the river, a form of Natural Flood Management, provides an array of landscape, ecological and human benefits. Further information can be found here https://valuing-nature.net/FloodplainNC	

Reference	Respondent	Comment Summary	Suggested response
		Referring to the water quality comments above, it is known that a few smaller, off-mains waste water discharges, can accumulate to create a damaging effect on water quality and therefore habitat quality; encouraging more dominant species at the expense of others. Silt and road run-off contributes to poor water quality not only locally but in the main rivers. Sediment blocks spawning gravels and blocks light for macrophyte plant growth. In heavily farmed areas field run-off can contribute to this. Farming Rules for Water aims to help reduce these impacts, further information can be found here https://www.gov.uk/guidance/rules-for-farmers-and-land-managers-to-prevent-waterpollution and https://www.gov.uk/government/publications/farming-rules-for-water-inengland.	
STAT-09	Suffolk County Council	Archaeology SCC welcomes the references to historical background of the parish in paragraphs 3.9 to 3 and Policy CNDP7 for including archaeological sites.	Supporting comments noted.
		Early Years Chelmondiston falls in the Orwell ward where there is a surplus of 15 full time places once approved planning applications are taken into consideration. As it stands there will be sufficient childcare places to accommodate an additional 52 dwellings by 2036. Primary Education Chalman distant Church of England Primary School has a capacity of	Comment noted. No change.
		Chelmondiston Church of England Primary School has a capacity of 140 places, however for planning purposes 95% capacity is used, making the capacity 133 places. The forecast for 2024/25 is a surplus of 44 places.	Comment noted. No change.

Reference	Respondent	Comment Summary	Suggested response
		Based on current forecasts, the school has sufficient surplus capacity to accommodate the additional pupils arising from this development. Should demand for places change, this may necessitate the expansion of the catchment school using developer contributions. Alternatively, another school in the area may require expansion using developer contributions in order to free up capacity at the development's local school by prioritising in catchment pupils through the admissions process.	Comment noted. No change.
		Secondary Education Holbrook Academy has a capacity of 600 places, however using 95% capacity, there is 570 places. The forecast up to 2024/25 expects a deficit of 49 places.	Comment noted. No change.
		The number of pupils emanating from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. The proposed strategy for mitigating this growth is via expansion of the school from 600 to 750 places. A high-level feasibility study has been completed which indicates that the accommodation can expand beyond the net capacity of 600 on the existing site. Development will be expected to contribute towards the expansion costs of schools.	Add paragraph summarising current position in schools to section 3.
		Flooding In general, Chelmondiston has a low risk of surface water flooding, is within flood zone 1 and no risk of reservoir flooding. Pin Mill does have a history of surface water flooding along the Pin Mill Road, and SCC built a series of measures including an attenuation area to store	Flooding comments noted. Add reference.

Reference	Respondent	Comment Summary	Suggested response
		surface water when there is the combined effect of heavy rainfall and a high or spring tide. These measures are maintained by the Parish. Also, as the hamlet is coastal large parts are within flood zones 2 and 3.	
		One point that is worth raising is the Strand at Wherstead and the effect the spring tides has on getting to/from the parish during these events and the impact it has by diverting traffic through other parishes of Tattingstone, Stutton and Holbrook.	
		SCC recommends that the following SuDS wording is added to Policy CNDP2 Design Principles:	Add new criterion (m) as suggested and commentary on surface
		will be assessed against the following criteria, where relevant:	water flooding issues to Background/Justificatio
		(m) Developments will not result in water run-off that would add to or create surface water flooding and unless inappropriate shall include the use of above ground open Sustainable Drainage Systems (SuDS), which could include wetland and other water features, which can help reduce flood risk whilst offering other benefits including water quality,	n of CNDP2.
		Health and Wellbeing	
		The neighbourhood plan makes reference to the fact that 28% of the residents are aged 65 or older, and yet does not appear to make any provisions for the needs of an ageing population. Building homes that are accessible and adaptable (meaning built to M4(2) building standards) means that certain residents such as elderly or young families are not excluded from buying property, as these homes are built to a standard that can meet the needs of a lifetime. While it is	Building Regulations not a matter for NDP. No change. Housing mix is dealt with by other development plan policy. No change.

Reference	Respondent	Comment Summary	Suggested response
		understandable that each housing type may not be suitably accommodated on every site, efforts should be made where possible to ensure that each site contains a mixture of housing types. This can help prevent segregation by age group and possible resulting isolation. While neighbourhood plans cannot set specific requirements for accessible and adaptable homes it is recommended that the neighbourhood plan supports their inclusion in planning applications.	
		Therefore, the following wording is recommended for Policy CNDP1 New Housing Development within Settlement Boundaries:	
		built to optional M4(2) standards), in order to meet the needs of the aging population,	See above.
		It is suggested that there could also be further considerations for the needs of residents who suffer from dementia, and the potential for making Chelmondiston Royal Town Planning Institute has guidance on Town Planning and Dementia2, which may be helpful in informing policies.	Comments noted. No change.
		Green Spaces and Facilities	
		The provision of the designated Local Green Spaces and other open 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.
		It is therefore suggested that paragraph 5.13 could include reference to the health and wellbeing benefits that can be gained from access to	Add reference to 5.13 as suggested.

Reference	Respondent	Comment Summary	Suggested response
		pleasant outdoor areas. Physical and mental health benefits can also be improved by increased access to the countryside.	
		We welcome the emphasis on retaining and creating community facilities. Availability of such spaces is key to reducing social isolation and promoting mental and physical wellbeing. It is vital any loss of existing facilities does not take place before alternative provision can be made. Co-location of health-promoting activities.	Support noted.
		Provision of community spaces will be beneficial in reducing social isolation and for hosting a range of classes and activities. The lockdown due to current Covid-19 situation has brought some challenges but brought some opportunities for people working from home instead of working in the offices etc. so creating such community hubs might positively influence business success and contribute to positive emotional and mental wellbeing.	Comment noted. No change.
		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 of these policies safeguard potential minerals surfaces and minerals and waste facilities.	Comment noted. Mineral and Waste a proscribed matter for NDPs. No change.
		Having reviewed the neighbourhood plan SCC has identified that the whole parish is within an area of potential minerals resource, however does not consider that the proposals in the neighbourhood plan cause safeguarding issue. Additionally, there are no minerals or waste	Comment noted. No change.

Reference	Respondent	Comment Summary	Suggested response
		facilities within the parish, so the neighbourhood plan does not cause any facilities safeguarding issues.	
		Natural Environment	
		It would be helpful for the Neighbourhood Plan to include some of the additional information from the Village Development Framework, such as the maps and images displaying the important views, or at least be referenced to explicitly within the Neighbourhood Plan, to highlight the evidence on which policies are based.	Review and add further references to VDF where appropriate.
		Policies CNDP 5 & 6 - Local Green Spaces	
		SCC welcomes Policies CNDP 5 and 6 protecting local green spaces and other open spaces, as part of the Greenest County Initiative . However, it is suggested that the neighbourhood plan ought to include a map displaying the Local Green Spaces and other open spaces, as it is not very clear to see on the Policies Map, which is a little cluttered. The following amendments is recommended for accuracy for Policy CNDP5:	Comment noted. Maps to be reviewed and more detailed maps provided in Appendix 1.
		Inappropriate d Development on these sites will only be permitted in very special circumstances, when potential harm to the local green space by way of inappropriateness, and any other harm, is clearly outweighed by other considerations.	No change. This is partial quote of national
		Policy CNDP7 Conserving and Enhancing Valued Landscape and Biodiversity	planning policy.
		There is a great detail in the introduction section regarding biodiversity and wildlife, which indicates that it is very important to the residents of	Amend CNDP7 as suggested.

Reference	Respondent	Comment Summary	Suggested response
		the parish. This could be better reflected in policy with specific reference to net gain in biodiversity. Therefore, the following wording is recommended to be added to Policy CNDP7 Conserving and Enhancing Valued Landscapes and Biodiversity:	
		New development should	
		 (n) ensuring the protection of natural features and providing a net gain in biodiversity through, for example, o the creation of new natural habitats including ponds o the planting of additional trees and hedgerows (reflecting the character of the hedgerows), and o restoring and repairing fragmented biodiversity networks 	
		Important Views	
		Seven significant views are mentioned in Policy CNDP7 (part g) which states that they are shown on the Policies Map and paragraph 5.14 states shown on Figure 6 in the Chelpin". However, there does not seem to be any significant views displayed on the Policies Map, and there is no map or image labelled Figure 6 in the Chelmondiston and Pin Mill Neighbourhood Plan. Map 2 of the VDF does show the important views, so it is recommended that this map should be included in the Neighbourhood Plan.	Correct Policies Map by adding views or provide in new map.
		Paragraph 5.14 is the justification and background for Policy CNDP7, however there appears to not be any justification for why these views were selected or what makes them important to the parish and worth protecting. There does not appear to be any real justification for these views in the VDF either. Adding a description of the views and the	Add justification and description of each view.

Reference	Respondent	Comment Summary	Suggested response
		features that make them special to the plan evidence base would make these polices more effective.	
		Public Rights of Way	
		At present, the neighbourhood plan does not make any reference to the protection or enhancements of public rights of way.	
		The introduction could include reference to the importance of public rights of way in the area, as these enable access into the AONB and provide residents and visitors access to the landscape	Add reference as suggested.
		Objective 3 could expand to reference the need to protect and enhance the local public rights of way network. The justification for this would be that the public rights of way network may provide access to, and linkages between, green spaces.	Not accepted, Objective 3 is about open space.
		There could be reference under Policy CNDP2 Design Principles to any new development protecting and enhancing the public rights of way network, where reasonable. Public rights of way can encourage healthy lifestyles by enabling access to the natural environment for physical and mental health and wellbeing.	Add to CNDP2 as suggested.
		There could be reference to other strategies that support this Neighbourhood Plan. This includes -2030 commitment to enhance public rights of way, including new linkages and upgrading routes where there is a need. The strategy also seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working.	Add references as suggested.

Reference	Respondent	Comment Summary	Suggested response
		Transport	
		There are footways on Main Road with varying widths and pedestrians need to cross the road a number of times to remain on the surfaced footway or walk on the verge or edge of footway in some instances. There are footways adjacent to the estate roads that links the community to the Primary School.	Comment noted. No change.
		There is a frequent bus service between Ipswich and Shotley which serves the village and could be used to commute to work. There is scope to improve the bus stops in the village with raised kerbs to DDA standards and installation of bus shelters where possible, which could potentially be funded by development.	Comment noted, add reference to possible bus shelter
		Future developments would need to consider the impact they would have on the highway, and consider improvements to the footway network and bus stops to promote sustainable transport as outlined in the National Planning Policy Framework.	improvement. Add this to references in
		It is recommended that there is provision for a proportion of on-street parking are considered for new developments. Having well designed and integrated on-street parking can help to reduce inconsiderate parking, which can restrict access for emergency services and refuse collections, and parking on pavements that hinder pedestrian access	Chelpin to footways. (Added to CP Objective 7)
		and safety. Please see pages 25-28 of Suffolk Guidance for Parking 2019 for further guidance.	Comment noted. This is a highway matter that can be dealt with as
		Therefore, the following amendment is recommended to part L of Policy CNDP2 Design Principles:	part of the development management process. No change.

Reference	Respondent	Comment Summary	Suggested response
		and, where possible, this is sited so that it is unobtrusive and does not dominate the street scene the visual impact of car parking should be minimised with a proportion of welldesigned on-street parking included in development designs	See above.
		General	
		It is suggested that Policy CNDP8 Protection and Enhancement of Local Shops, Community Facilities and Public Houses, and CNDP10 Local Business and Shops could be incorporated together into one consolidated policy, as there appears to be a bit of an overlap in the topic covered.	Noted. No change. New UCO.

Table 3 Residents

Reference	Respondent	Comment Summary	Suggested response
R001	Resident	Support	Support noted.
R002	Resident	Support for whole plan.	Support noted.
R003	Resident	Policies CNDP2 and 4. Policy CNDP2 amend criterion (a) to "and detailing, building style and the vernacular of the settlement in which it is to be located <i>including</i> the design and scale of windows and glazing, doors and porches, eaves and gables, gates and boundary walls and fences."	Amend as suggested.
		Policy CNDP4 – add Webb's Boatyard to non-designated heritage assets.	Group considered adding Webb's Boatyard to non-designated heritage assets but decided against since although the boatyard business is of historic interest the buildings themselves are not.
R004	Resident	Support	Support noted.
R005	Resident	Support	Support noted.
R006	Resident	Maps 3a and 3c – seeks an amendment to these maps.	These maps are from the Babergh and Mid Suffolk Local Plan Preferred Option. Maps cannot be amended in the Chelpin, Suggest

Reference	Respondent	Comment Summary	Suggested response
			contacting respondent advising that their comment should be made in response to the Joint Local Plan.
R007	Resident	My overall view of the CNDP is that it is a thorough, balanced document which well represents the majority views of those who live and work in the parish and which sets out appropriate aspirations for the future of the community. I give the document my wholehearted support, but wish to make a few comments/suggestions:	Support noted.
		1. Page 10. KEY ISSUES, first bullet point, final sentence. It is my view that this sentence is far too weak, especially in view of comments and policies elsewhere in this plan and in Babergh Mid Suffolk Draft Plan. Babergh's draft Plan states that development in areas beyond the settlement boundaries "will only be permitted in exceptional circumstances subject to a proven justifiable need." I suggest therefore that the final sentence in the Chelpin Plan, KEY ISSUES, first bullet point should read: "There should not be any development in the Area of Outstanding Natural Beauty (AONB), Sites of Specific Scientific Interest (SSSIs) and RAMSARs site (protected wetlands) unless an overriding local need can be established and there is no suitable alternative site within the settlement boundaries."	Comment noted. The Chelpin does not deal with these matters. No change.
		2. Page 14. Introduction paragraph 3.8	Add to paragraph 3.8.
		The mature, disease-free elm tree in Richardson's Lane should be mentioned as a notable natural asset which requires protection.	

Reference	Respondent	Comment Summary	Suggested response
		 Page 25 CNDP Objective 1, final paragraph. This statement should be more strongly worded, quoting Babergh's policy CS2 to read: "Proposals for development located outside of these settlement boundaries will only be permitted in exceptional circumstances subject to proven justifiable need." 	Amend to bring in to line with policy CS2. Amended.
		 4. Page 26 CNDP Objective 2 (d) The words "It uses space" at the beginning make the meaning of this paragraph unclear. I suggest the wording should be: "It creates a feeling of spaciousness by incorporating new open spaces" 5. Page 35 CNDP Objective 8. 	Amend as suggested. (CP2 amended.)
		I suggest that the list of valuable community facilities should include the playgroup. Clerical Issues Noted in the draft CNDP Page 27 Paragraph 5.6, 3 rd line from the bottom 'pan' should read 'plan'.	Is the playgroup housed in its own building? Yes - added to local facilities.
		 Page 31 CNDP Objective 3, final paragraph Remove the word 'inappropriate' at the beginning of the paragraph. 	Amend.

Reference	Respondent	Comment Summary	Suggested response
		Page 31 paragraph 5.12 Final sentence requires a comma after 'once designated'	This wording is from national policy – no change.
		• Page 33 CNDP Objective 4 (e) 3 rd line Remove 'the' from: 'is provided elsewhere on- the site or'	Amend as suggested.
		 Page 34 CNDP Objective 4 paragraph 5.14, 3rd line from the end: 'Figure 6 in the Chelpin.' Add the word 'Plan'. 	Amend as suggested.
		 Page 36, paragraph 5.15 (Final sentence): 'e.g. swimming at Holbrook Academy" There is no swimming pool at Holbrook Academy. The school pool which is available to community groups 	Amend as suggested.
		is at Ipswich High School, Woolverstone. (Whether this is still available to community groups under the new owners I do not know.)	Amend as suggested.
R008	Resident	Development Plan. Congratulations on a considerate and well prepared document. We are supportive of the proposals subject to the following comment. Policies CNDP2 and CNDP3 both make reference to a preference for pitched roofs. For example, Policy CNDP3 states that:	Support noted.
		"Development proposals will be supported where they use pitched roofs with cottage style dormer windows and chimneys".	
			Amend to be less prescriptive.

Reference	Respondent	Comment Summary	Suggested response
		I tend to agree that there should be a general preference towards pitched roofs in cottage settings and/or heritage assets. However, there is an implication in this policy that any other type of construction, for example flat roof construction, would not be supported. If this is the proposal then in my view it goes too far.	
		For example, there are already a number of existing buildings in the area (such as some of the buildings on Orwell Rise) which have flat roof construction. It would be inappropriate for any development proposals to such buildings only to be supported if they encompass pitched roof construction. As a minimum, this policy should be qualified for cases where there is an existing non-pitched structure.	
		In addition, a sensitively designed extension of an existing development can benefit from a more contemporary roof design and can avoid an unhappy pastiche of new construction being made to look traditional. In my view, whilst the policy should certainly discourage poor quality modern development, I believe that high quality, beautiful architectural design should be encouraged in the village, particularly where the design has architectural merit and uses appropriate, quality, materials (timber, zinc etc).	
R009	Resident	Supporting comment and need for at least two car parking spaces.	Support noted. Car parking will provide in line with local adopted standards – no change.
R010 R011	Resident Resident	Supporting comment I have just read the Chelpin NDP, and the one thing that stands out as missing, is any reference to the Pin Mill Sailing Club, as a "Sport and recreational facility", which I would have thought should be included as a village asset. As well as the clubhouse, there is the area of grass that has tables and benches (include in the Green Space Appendix?). One thought regarding this is what would happen if the club was to fold - if it is not covered in the development plan, the likely outcome	Support noted. Add reference to Sailing Club in CP9.

Reference	Respondent	Comment Summary	Suggested response
		would be building of dwellings on the site, so I would think there ought to be some mention of it. (FYI - I am one of the PMSC trustees). Probably not so significant, but the National Trust plan to fell a significant number of the trees in the Cliff Plantation - basically all the conifers in the area abutting Cordles / Hill Farm Equestrian Centre paddocks and FP 43 (would have been done by now, if it was not for Covid-19).	Comment noted. No change.
R012	Resident	Support, particularly need to protect AONB.	Supporting comment noted.
R013	Resident	Support, particularly need to protect AONB.	Supporting comment noted.
R014	Resident	The Plan is excellent, and I congratulate the Steering Group for its work and its vision following the Village Design Statement (with which, by the way, I was involved). So I accept the Plan almost as is, but wish to make some remarks/suggestions relating to items that need, in my view, to be a bit bolder in ambition. For example –	Supporting comment noted.
		I am keenly aware that localised habitat fragmentation plays an enormous role in the overall collapse of natural systems. So under 5.5 PolicyCNDP2 Design Principles (c) I would replace 'makes links' with 'creates wildlife corridors with other wildlife areas within and beyond the neighbourhood boundary'.	Amend as suggested.
		This is not clear either in CNDP 7, especially (e) and (f) which is piecemeal rather than integrative, holistically, in its approach.	Comment noted, no change.
		5.7 Replace 'zero carbon homes' by the phrase 'Passive House' i.e. the ambition to quickly reach Passive House standards, which is a clarion call for highest standards now, and which must be achieved in	Add reference to Passivhaus.

Reference	Respondent	Comment Summary	Suggested response
		the looming evidence of destructive global heating and terrible atmospheric chaos.	
		Under Heritage, non-designated heritage assets, I suggest to include my The Old Meeting Room (it was built in 1735 after all) and even more historical examples, Alma Cottage and no 26 Church Road, which, as one building, are I think 15th or 16th century - just need confirming.	Group to consider adding these to list of non-designated heritage assets.
		Under 5.21, road safety and slowing traffic speeds; I accept exploring different methods of traffic calming including making more of the pinch points (I suggest Plenty in the pinch points), and designated pedestrian crossing points, but until such facilities are in place I would hotly oppose parking restriction on the main road - for the reasons I think there's a need to enforce pinch points.	Comment noted. Add Parish Council Supporting Action
		Moreover, because relentless traffic- the noise, and the gases - causes heart attacks, high blood pressure, cognitive depreciation, especially in children, and dementia - car use needs to be designed out - especially single-occupancy car use. One element could be that new developments could offer limited parking (not sufficient parking), for shared car use/lifts schemes, for example.	Comment noted. No change.
		Generally, I didn't see mention of social housing. 'Housing need' is a cover-all term used by governments and the building lobby, and it allows loads of speculative development, as it perfectly clear to anyone with eyes. But the need is for locals who have nowhere near the ridiculous amount of capital required - mostly young people, local young people - for whom not even in so-called 'affordable housing' (the other cover-all term, which is 80% of outlandish house prices) has any meaning.	This is dealt with on the Local Plan. No change.

Reference	Respondent	Comment Summary	Suggested response
R015	Resident	Support, particularly AONB, SSSI and Ramsar	Support noted.
R016	Resident	Following the design principles is important, especially Policy b, g, h and j	Support noted.
R017	Resident	I object to the proposed local plan: I am astonished that there is no recognition of the need for more public parking, both for local residents who live on the main road, as well as visitors to Pinmill and the local area. There is a dire need for parking. Appendix 2 showed that a number of people raised this as an issue. Failing to improve parking means you cannot help the local businesses grow which is a stated aim in policy CNDP 10 My suggested solutions are I. Extend the village car park near the Red Lion 2. Convert the horrid Picnic area next to the existing Pin Mill public parking, the dismal damp picnic area has no views, and might as well be parking, the description in Table Al page 47 is inaccurate 3. Create one or more completely new parking areas near a public footpath, the public who like walking often take up the whole main road car park when they arrive as group walkers so why not have a parking area outside the village that encourages more walking. Table A2, page 50 item I, this area is frequently mis-used by people parking to display their "for sale" vehicles, this is unsightly and damages the wonderful daffodil bulbs, which suffer from the weight of the vehicles parked there. There should be some protective barrier to prevent vehicular access.	Group to consider further actions on car parking. See CP OBJECTIVE 7 - To ensure that the area has appropriate levels of infrastructure and Section 5.
		The plan has no consideration of disability issues, with several wheelchair users in our household, I can tell you the pavements are dangerous to use for a wheelchair-not wide enough in most places, and the camber leans dangerously into the roads	Group to discuss. PC owned – enforce?

Reference	Respondent	Comment Summary	Suggested response
		My overall feeling is that the village boundary has been drawn so tightly that this will	Add more on disability
		provide grounds for challenge in the future.	issues. Design policies.
			Village boundary is from the Joint Local Plan – no change.
R018	Resident	Sorry have no trust they will do what they like or who shouts loudest.	Comment noted. No change.
R019	Resident	General support	Support noted.
R020	Resident	Social media post liking R018.	Comment noted.
R021	Resident	Support	Support noted.
R022	Resident	Support, especially AONB, SSSI, Ramsar	Support noted.
R023	Resident	Support	Support noted.
R024	Resident	Amend objective to resist development in AONB.	Resist is too strong,
			development can take
			place in AONB but is
			"restricted". Use word
			"restricted".
R025	Resident	Support	Support noted.
R026	Resident	Does not want to see further large scale development on the peninsula	Comment noted. No
			change.
R027	Resident	Pin Mill House boats.	Not a matter for the
			Chelpin. Comments
		They should not discharge black OR grey water directly into the river.	noted, no change. EA
		The council needs to seek guidance from the Environment Agency	test? New JLP.
		who must approve all discharges into any water course, attached is an email I received from the Environment Agency.	

Reference	Respondent	Comment Summary	Suggested response
		In the short term until this very serious issue is resolved the house boats MUST follow the guidance on products they should use on the Green/Blue web site Look at the warning on some washing up liquids like Fairy Liquid which states that it is harmful to aquatic life with long lasting effects, products like these must not be used.	
		The above are already in place on the Thames and the guidance given by the PLA for the Thames should be implemented on the Orwell, extract below from https://exer1.boatineonthethames.co.uk/Houseboats-LivingAfloat also included.	
R028	Resident	I would like to assure you that in assuming that anyone who has not sent in a response to the Plan does not care about the village is quite wrong. I have not responded thus far, because, like some others, I passionately believe that the development of the Hill Farm field would be a very good thing for the village, but I assume that because noisy important people, with deep pockets are opposing it, the idea stands absolutely no chance, and my view would simply be ignored.	Comment noted. No change.
		Hoping that I might be listened to, I will try to explain why I am so convinced. I was born in this village in 1954. I have never lived anywhere else, and have worked in the village all my life. The village is VERY important, and precious to me. I believe that it needs to grow in order to prosper. We need to welcome new residents, especially young families. No growth equals slow death. You may say that the rate of growth if we had a number of dwellings added in one go would be too fast. I contest that, for this reason. I well remember the addition	
		of the Woodlands to the village. I helped my father with a retail milk round at the time, and we used to go round every day looking for new curtains going up, so as to get new customers. When Woodlands was built, the area of land was larger than the Hill Farm site, and, more	

Reference	Respondent	Comment Summary	Suggested response
		importantly the 88 units added to the village was a SIGNIFICANTLY larger proportion of the existing village than the Hill Farm one would be. The village was NOT ruined by that, it was the making of it, enabling the supporting of a school, as a result. People who furiously oppose this new step are simply being selfish, we call them NIMBYS, and short sighted. They are fighting because they worry that their view might be curtailed, or their property be devalued.	
		The number of units which might be built on Hill Farm field has been a cause for concern. The Kirkups' fliers a while ago spoke of 90 units, designed to scare people, no doubt. When brother David and I spoke to the developer, he spoke of under 50. The proposed plan of 70+ was simply a starting point from which to negotiate down. That is a MUCH smaller percentage of the overall size of the village than was absorbed so successfully 50 or more years ago. History proves to us that this step could be done with ease.	
		The viability of the shops, and particularly the school would be enhanced by growth. So too the other businesses.	
		Looking through the Plan, I see no place where the Hill Farm site militates against the aspirations of the village. The most negative thing I can see is on page 17, where as I understand it, Babergh Planning Policy says that development in Hinterland villages "will only be permitted in exceptional circumstances subject to proven justifiable need".	
		In sum, I therefore urge you to drop this implacable opposition to a necessary, indeed, essential step in the ongoing life and development of our village, and do all in your power to support it.	

Reference	Respondent	Comment Summary	Suggested response
R029	Resident	Comment on Map 3A and paragraph 4.9. Disappointed to see	Settlement boundaries
		settlement boundary used from Local Plan.	a matter for Joint Local
			Plan. No change to
			Chelpin. Respondent
			should engage in Joint
			Local Plan process.
R030	Resident	General Support. Specific support for CNDP1 and there should be no	Support noted. No
		development in AONB, SSSI.	change.
R031	Resident	Support	Support noted.
R032	Resident	Support – all green spaces should be protected.	Support noted
R033	Resident	Support	Support noted.
R034	Resident	I wish to oppose vehemently the proposed development at Hill Farm	Comment noted. No
		Chelmondiston. This site already has plenty enough properties on	change.
		three sides, and I consider it would be very crowded and over-	
		developed if the proposal were to be allowed.	
		Despite what our government keeps telling us,in that we need so	
		many more houses,I consider that this proposal is merely to satisfy	
		greedy developers who are intent on spoiling the countryside,and at	
		the same time, providing homes which are too expensive for our young	
		people to purchase.I am well aware that the developers are duty	
		bound to provide so-called 'starter-homes ' in a development of this	
		size,but I am still very much against the whole idea.	_
R035	Resident	I'm generally very supportive of the plan especially where it aims to	Support noted. Remove
		protect all the green spaces and limit the size of development. Small	Riga from non-
		developments or infill are no great problem especially if they are well	designated heritage
		designed to blend in, like the Nursery site in Woolverstone where the	assets, add Dions
		properties look high quality and the design is sympathetic to the village	Cottage.
		style. Sadly at Pin Mill which should be particularly protected we have	
		two examples of properties which to me are neither, in fact are	
		eyesores. Listing the Riga as a building of note is far too late as the	
		original has long gone in my opinion, but I would suggest Dions	

Reference	Respondent	Comment Summary	Suggested response
		Cottage is far more deserving. It has been beautifully maintained to preserve and enhance its character.	
		Well done and thanks to all those who have done such a lot of work on this	
R036	Savills	Savills (UK) Ltd is instructed by the Landowners of Land north of Main Road, Chelmondiston to submit representations in response to the Chelmondiston Neighbourhood Plan (Chelpin) Regulation 14 Consultation, closing date 1st September 2020.	
		Broad support is given to Chelmondiston Parish Council for the preparation of a draft Neighbourhood Plan however we have set out below a number of comments for consideration as the Neighbourhood Plan progresses to the next stage of consultation and then Examination. As you will be aware it is necessary for Neighbourhood Plans to meet the basic conditions which include the requirements to seek to contribute to achieving sustainable development and to have regard to national policies and guidance.	Support noted.
		National Planning Policy Context The National Planning Policy Framework 2019 (NPPF) establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. The three objectives of sustainable development, as set out in the NPPF, require the planning system to perform an economic, social and environmental role. Paragraph 8 of the NPPF explains:	Comments on national planning policy noted. It is not a requirement for NDPs to allocate sites. Chelpin does not do this. The settlement boundaries will be defined in the Joint Local Plan. No change.
		a) an economic objective _ to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the	, and the second

Reference	Respondent	Comment Summary	Suggested response
		right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;	
		b) a social objective _ 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 present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural wellbeing; and	
		c) an environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.	
		For plan making, Paragraph 11 of the NPPF, requires that Local Planning Authorities positively seek opportunities to meet the development needs of their area.	
		Paragraph 78 of the NPPF outlines to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It notes that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby. Residential development in such settlements can make a significant contribution to the maintenance	

Reference	Respondent	Comment Summary	Suggested response
		and continuing provision of local services and facilities for community use, as supported by paragraph 83 of the NPPF in relation to Supporting a Prosperous Rural Economy.	
		In respect of housing delivery, the NPPF recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, as they are often built-out relatively quickly (paragraph 68).	
		It is therefore important that the emerging Neighbourhood Plan pursues a development strategy which allows for the growth of Chelmondiston as a means of ensuring its long term sustainability. An approach to growth which allows for development at an appropriate scale, triggering the provision of affordable housing, is vital.	
		Chelmondiston Neighbourhood Plan Regulation 14 Consultation Document, July 2020	
		The focus of the comments made on behalf of our client relate to the • following policies: Policy CNDP1 New Housing Development • within Settlement Boundaries • Map 4 Policies Map • Policy CNDP2 Design Principles Policy CNDP7 Conserving and Enhancing Valued Landscapes and Biodiversity	
		Planning Policy Context	
		For a Neighbourhood Plan to proceed to a referendum it must meet a set of basic conditions	

Reference	Respondent	Comment Summary	Suggested response
		Section 4 of the Draft Neighbourhood Plan explains the relevant planning making reference to the adopted Core Strategy and emerging Babergh and Mid Suffolk Local Plan. It is unclear from the available documentation whether Chelmondiston Parish Council intends to process the Neighbourhood Plan in advance of the emerging Draft Local Plan, or following the adoption of the emerging Local Plan. This is necessary so that the Parish Council can take relevant relevant steps to meet the basic conditionss Given the inclusion of the emerging Draft Local Plan Policy Map extracts, it would suggest that the Neighbourhood Plan intends to follow the adoption of the Draft Local Plan. It is recommended that the Neighbourhood Plan follows the adoption of the emerging Babergh and Mid Suffolk Joint Local Plan to be able to rely on the DC's evidence base and seek to avoid the situation where the Neighbourhood Plan could quickly be afforded reduced weight in decisions about planning applications if	
		there is conflict with the overarching Joint Local Plan. Remedy: It is recommended that the Parish Council confirms the emerging Neighbourhood Plan is intended to be made following the adoption of the emerging Babergh and Mid Suffolk Joint Local Plan. This approach will provide longevity to the Neighbourhood Plan.	In line with government guidance the Chelpin will progress ahead of the emerging Joint Local Plan. The plan will be examined against the development plan at the time, not the emerging plan. No change.

Reference	Respondent	Comment Summary	Suggested response
		Policy CNDP1 - New Housing Development within Settlement Boundaries	
		Objection Draft Policy CNDP 1 does not propose to allocate any sites for residential development.	
		Part of the Vision for Chelmondiston states: "By 2036 any development will have been sustainable, with the necessary infrastructure a place that is thriving and enjoyable for residents, local businesses and visitors (page 10 resulting in	
		Relevant objectives of the Neighbourhood Plan are: 1. To help manage future housing growth and to meet local housing needs within the neighbourhood area. 5. To protect and enhance community and recreation facilities. 7. To ensure that the area has appropriate levels of infrastructure.	
		It is clear that Chelmondiston benefits from a number of existing services and facilities which can support additional residential development. Babergh's Settlement Hierarchy Assessment 2019 identifies the following available facilities: Convenience store Post Office Food and drink outlet	
		Other retail Pre-School Primary School Village Hall Places of Worship Bus service operating at peak times Recreation ground	

Reference	Respondent	Comment Summary	Suggested response
		Super-fast broadband	
		It is particularly important that Chelmondiston is not be viewed in isolation, but as part of a wider network of settlements in this part of Suffolk all of which work together to provide a critical mass to support local services. It is important to recognise the opportunity new homes provide to help sustain existing services and facilities.	
		The Adopted Development Plan comprises of the Babergh Core Strategy & Policies DPD (2014) and relates to the plan period 2011 to 2031. It is noted that the front cover of the Draft Neighbourhood Plan identifies that the plan period is intended to be 2020 to 2036, extending the current Development Plan by 5 years.	
		EMPAHSParagraph 33 of the NPPF rei Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary The Babergh Core Strategy was adopted some 6 years ago. In accordance with requirements the Council has taken the decision to prepare a new Local Plan jointly with Mid Suffolk.	
		In respect of the housing requirement for emerging Neighbourhood Plans, in instances where strategic policies for housing are out of date as is the case for Chelmondiston para 66 of the NPPF states	
		Where it is not possible to provide a requirement figure for a neighbourhood area the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood	

Reference	Respondent	Comment Summary	Suggested response
		area and the most recently available planning strategy of the local planning authority	
		The Regulation 18 Draft Joint Local Plan was the subject of consultation in July and September 2019. At that time, Babergh Council suggested for the period to 2036 Chelmondiston Neighbourhood Plan should be planning for a minimum of 52 new homes (Table 4), draft Policy SP04 specifically states:	
		In order to assist with delivery of the overall district housing need requirements, designated Neighbourhood Plan areas will be expected to plan to deliver the minimum housing requirements set out in Table 4 between 2018 and 2036.	
		Despite this clear direction, the draft Neighbourhood Plan does not propose to make any allocations. As a consequence there is concern that the overall spatial strategy for Babergh will be compromised.	
		It is noted in recent years that Babergh Council has not been able to demonstrate a five year housing land supply which resulted in a number of speculative applications for residential development, including sites at Chelmondiston (Land west of Woodlands, Chelmondiston LPA Refs: DC/18/00236 and DC/19/01634). The identification of an appropriate site for allocation within the emerging Neighbourhood Plan can help to prevent speculative applications and would take a positive, planned approach to development.	
		Within the National Planning Policy Framework, paragraph 14 provides an additional level of protection to neighbourhood plan areas where the District Council has a shortfall in housing land supply. It states:	

Reference	Respondent	Comment Summary	Suggested response
		14. In situations where the presumption (at paragraph 11d) applies to	
		applications involving the provision of housing, the adverse impact of	
		allowing development that conflicts with the neighbourhood plan is	
		likely to significantly and demonstrably outweigh the benefits, provided	
		all of the following apply: a) the neighbourhood plan became part of	
		the development plan two years or less before the date on which the	
		decision is made;	
		b) the neighbourhood plan <u>contains policies and allocations</u>	
		to meet its identified housing requirement;	
		c) the local planning authority has at least a three year	
		supply of deliverable housing sites (against its five year	
		housing supply requirement, including the appropriate buffer	
		as set out in paragraph 73); and	
		d) the lpa's housing delivery was at least 45% of that	
		required over the previous three years.	
		As there are no allocations contained within the draft Neighbourhood	
		Plan, Chelmondiston would not be able to benefit from the above	
		additional level of protection. Furthermore, a recent legal judgement	
		has confirmed that it is not sufficient to simply rely on the identification	
		of committed development (i.e. sites already benefitting from planning	
		permission) within Neighbourhood Plans. As such it is necessary to	
		identify new sites for residential allocation to benefit from this	
		additional level of protection.	
		New development can create a number of benefits. Small to medium	
		sized development it can provide a mix housing types and sizes,	
		including affordable housing responding to local needs. A further direct	
		benefit is the receipt of additional CIL funding which can be used to	
		support local infrastructure schemes. It is acknowledged that once the	
		Neighbourhood Plan is made,	
		Infrastru However, as the Neighbourhood Plan does	

Reference	Respondent	Comment Summary	Suggested response
		not propose to identify any allocations, there will be very limited opportunity for additional CIL income to be forthcoming. Furthermore it is noted that objective 5 of the Draft Neighbourhood Plan is To protect and enhance community and recreation facilities It is therefore questioned how the plan seeks to meet this objective to not only protect but to enhance recreation facilities without relevant funding.	
		Remedy: • A revision to Draft Policy CNDP 1 is required to plan for additional housing at Chelmondiston to respond to the 52 dwelling requirement identified in the emerging Joint Babergh Mid Suffolk Local Plan. • Development of this scale will deliver associated affordable housing in accordance with District policy requirements. • In addition, this increased population will also support the retention of existing facilities at the settlement.	NDPs are not required to allocate sites. No change.
		Land north of Main Road, Chelmondiston should be identified for residential allocation. Suggested policy wording: Land north of Main Road, Chelmondiston is allocated for residential development: a) The development of the site will accommodate approximately up to 40 dwellings (subject to discussion). b) Access to the site can be taken from Main Road. c) The development layout will be designed in order to respect the living conditions and amenity of the residents to the east and west of the site. d) Incorporate appropriate landscape mitigation measures.	Comments noted. There is no requirement to allocate a site. No change.
		We would welcome the opportunity to explore the options, including the scale of development, with the Neighbourhood Plan Steering Group.	

Reference	Respondent	Comment Summary	Suggested response
TOTOTOTO CONTRACTOR OF THE PARTY OF THE PART	respondent	Map 4 Policies Map It is noted that the draft Policies Map for the Neighbourhood Plan proposes to replicate the settlement boundaries as proposed within the emerging Babergh and Mid Suffolk Local Plan. For the reasons stated above, it is recommended that the Neighbourhood Plan amends the extent of the settlement boundary so that Land north of Main Road, Chelmondiston is located within the settlement boundary. Policy CNDP2 - Design Principles Support is given to Draft Policy CNDP2 as it is clear that design has	The settlement boundary is a matter for the Joint Local Plan. No change.
		an important role to play in the delivery of new development at Chelmondiston which responds positively to the character of the settlement. The draft Neighbourhood Plan has aspirations for good design, where appropriate the use of traditional materials and energy efficient homes.	Support noted.
		Policy CNDP7 Conserving and Enhancing Valued Landscapes and Biodiversity It is noted that the National Planning Policy Framework affords great weight to conserving and enhancing landscape designated within Areas of Outstanding Natural Beauty (para 172). However consideration needs to be balanced against the need to fulfil economic and social objectives (as provided at page 1 of this response).	There is no requirement to allocate a site. No change. National planning policy is such areas is that

Reference	Respondent	Comment Summary	Suggested response
		Draft Babergh and Mid Suffolk Local Plan Policy LP19 AONB states: a. Gives great weight to conserving and enhancing the landscape and scenic beauty; b. Does not adversely affect the character, quality views and distinctiveness of the AONB or threaten public enjoyment of these areas; and c. Supports the wider environmental, social and economic objectives as set out in the AONB Management Plan	development should be restricted.
		As such, the overarching policy context enables for the provision of carefully planned development within the AONB where it is justified. It is recommended that the Neighbourhood Plan makes an allocation for residential development to ensure that the identified housing needs are met in a planned approach, as discussed in detail above. Through the allocation process it will be necessary to consider the landscape impacts of development so that judgements can be made about where new homes should be directed. As part of this process consideration can also be given to the opportunity the site would have to incorporate appropriate landscaping.	
		It is noted that draft Policy CNDP7 proposes a number of specific policy criteria. Para 5.14 states Policy CNDP7 has been developed by using a wide variety of evidence sources, including work carried out for the VDF It is requested that relevant evidence for the Draft Neighbourhood Plan should be made available and it should robustly justify the proposed policy criteria. It is requested that this is made	Make available the evidence base.

Reference	Respondent	Comment Summary	Suggested response
		available for consideration as part of the next round of consultation (Regulation 16).	
		As stated above, Land north of Main Road, Chelmondiston is promoted for residential allocation. It is acknowledged that this site is located within the AONB. This site is also located immediately to the west of Land west of Woodlands, Chelmondiston which was recently the subject of a speculative planning application which was granted planning permission by Babergh District Council (LPA Refs: DC/18/00236 and DC/19/01634).	
		It is requested that consideration is given to the Land north of Main Road, Chelmondiston as an edge of settlement location for new housing at Chelmondiston. There are existing hedgerows and trees to the south and west of the site. As part of comprehensively planned development, potentially concentrated at the northern part of the site, there is the opportunity for enhanced landscaping, particularly at the western edge of Chelmondiston.	
		Conclusion	
		It is important that the Neighbourhood Plan is considered within the context of national policy which continues to focus on the importance of growth and housing in rural areas. The inclusion of a sufficient amount of housing growth is vital to the long term sustainability of this	
		rural community. Development is essential to secure the future of services and facilities in the local area, which are key to the long term sustainability of rural communities.	See previous recommended response.
R037	Resident	Opposes further development.	Noted. No change.

Reference	Respondent	Comment Summary	Suggested response
R038	Resident	Please record my name in support of the Chelmondiston Neighbourhood Develpoment Plan, as agreed by the Parish Council previously. It should always be remembered that this is a rural community, surrounded by farmland, whose housing needs are adequately provided for by the small developments already planned. Housing estates at either end of the village, to accommodate the overflow from Ipswich, are not required or needed by the local residents.	Support noted.
R039	Resident	I have read through the development plan and support it in it's entirety .	Support noted.
		On the subject of roads and traffic control, and while I suspect that this is not the appropriate place to mention it, I do have concern about the narrowness of the pavements on both sides of the main road between Church Road and Chesapeake Close. I know that I and other pedestrians fear that we are are at considerable risk from our closeness to the huge lorries and agricultural machines that frequently pass through the village.	Comment noted. No change.
		Having said that I would like to express my appreciation to all those who were instrumental in the production of such an excellent plan.	
R040	Resident	The Committee has made a great effort to satisfy comments from Chelmondiston residents as to how they see the future of their village with an emphasis on small developments and infill. Every effort should be made to preserve the character of the village and this paper has, I believe, gone a long way to achieving this. As such I support this paper in going forward to the next stage.	Support noted. Comments on changes to planning system. The Chelpin will be part of the development plan and given appropriate weight in decision
		At the same time, it would be nice to see some infrastructure improvements from Babergh DC to cope with all the additional building on the Peninsular.	making.

Reference	Respondent	Comment Summary	Suggested response
		If I have any reservations regarding CNP it would be as to how much weight they would carry in a future planning system. Central Government announced a month ago they would be looking at the present system in order to speed up building in the country. The experience at East Bergholt, when the village plan was practically ignored by Babergh, was not encouraging.	
		Overall, I still support this document.	
R041	Resident	Pin Mill Lane is a very pretty lane leading to the river . It has to cater for a great many people and uses. At times it is almost impossible to go up and down e.g. Sunday between 11am and 3pm However there is much traffic going to the popular Butt and Oyster, visiting the boat yards, people going for walks, sitting watching the river and children playing in the Grindle. When there is considerable parking along the road there is not room for two vehicles to pass each other. Then there is much reversing and shuffling -it is also part of the Suffolk B cycle route. I cannot think what can be done to improve the situation and not spoil the pleasant road. Maybe there could be passing places which are more frequent and more defined but certainly not concrete and hard standing. Here cars could tuck in and traffic and pedestrians could avoid on coming traffic. Also within the last two years it has at times become very difficult to turn out of	Comments noted. No change.

Reference	Respondent	Comment Summary	Suggested response
		Pin Mill Lane onto Main Ipswich Road as so many cars are parked	
		along the road that when you see it is safe to turn out towards lpswich	
		before you have passed the long line of parked cars there may be a	
		vehicle coming from the Ipswich direction and there is nowhere to go.	
		Parking in Pin Mill is really difficult and people totally ignore the yellow	
		lines and instructions not to park.	
R042	Resident	Support	Support noted.
R043	Resident	Support – no building in AONB, Ramsar, SSSI.	Support noted.
R044	Resident	Support	Support noted.
R045	Resident	Support	Support noted.
R046	Resident	Support	Support noted.
R047	Resident	Would like to see more protection for AONB etc. Policy CNDP says	The significance of the
		"protecting according to their significance": what does this mean?	AONB and other
			designated sites stems
			from their protection
			under other legislation
			and the weight afforded
			to them in national
			planning policy. Add
			reference to this in
			Background/Justificatio
			n section of CNDP7.
R048	Resident	Accepts Chelpin would be beneficial for village. The plan does not	Comments noted. No
		include house numbers or affordable house numbers for next 5 years.	change.
		Any new development should be small in scale. The plan includes little	
		expansion for employment. Pleased to see the houseboat area	
		included – this provides affordable housing.	
R049	Resident	Support.	Support noted.
R050	Resident	Support, although concerns about traffic on Woodlands and Main	Support noted.
		Road.	Comment on traffic
			noted, no change.

Reference	Respondent	Comment Summary	Suggested response
R051	Resident	Support	Support noted.
R052	Resident	Support	Support noted.
R053	Resident	Support	Support noted.
R054	Resident	General support. Including the land between Meadow Close and White	Support noted. AONB
		House Farm precludes more social housing.	boundary not a matter
			for Chelpin. No change.
R055	Resident	Support for Policies 1 to 10.	Support noted.
R056	Resident	Support	Support noted.
R057	Resident	Support	Support noted.
R058	Resident	Support	Support noted.
R059	Resident	Support, particularly AONB, Ramsar, SSSI.	Support noted.
R060	Resident	Supports document as a whole.	Support noted.
		Objective 1 – any local need should be accurately assessed before a proposal is approved. Support for objective 4.	This will be a matter for the planning application process. No change. Support for objective 4
		Traffic calming consideration should be given for a roundabout at Lings Lane/Woodlands.	noted. Group to consider. Urban and inappropriate.
R061	Resident	Support – no houses.	Support noted.
R062	Resident	Objective 7 – junction at Pin Mill Road and Woodlands need improving. Strengthen objective 7.	Main Road junctions at Pin Mill Road & Woodlands need improving. Decided not to further this suggestion. Aside from the fact that the PC has

Reference	Respondent	Comment Summary	Suggested response
			no ability to act on this it
			was felt that any
			problems there might be
			are more down to road
			users than the junctions
			themselves.
R063	Resident	Support	Support noted.
R064	Resident	Support	Support noted.
R065	Resident	Objective 3 – the hedge referred to is private property maintained by	Noted. No change.
		the occupant.	
		Rest illegible.	
R066	Resident	CNDP 1 New Housing Design and Policy	
		CNDP2	
		CNDP2	
		1.1 No new houses should have access frontage onto the main road	This is a development
		81456 (to be sited on a side service road)	management issue and
		01 100 (to 20 ofted off a clas convice road)	will be assessed against
			highway authority
			standards. No change.
			community of the second of t
		1.2 Re para 3.17 The 13% "Social Rented" proportion	The figure referred to as
		(Council/Housing Associations) quoted on Page 15 should be raised	a fact from the 2011
		to 50% plus in new build policy.	Census. Target noted,
		1.3 CNDP p26 para g	but considered
			unrealistic. Support in
			principle.

Reference	Respondent	Comment Summary	Suggested response
		My house and the one attached to it (No.2) are three storey Edwardian Villas which fit in well in Church Road. There are others like it in the village. Consider the wording should be changed from "not more than two stories" to "not more than three storeys". (see*Note I.)	Group to consider raising to 3 storeys – context/not prescriptive.
		1.4 The planning and design emphasis should seek to maintain the high density of the original village buildings of the Georgian, Victorian and early Edwardian period, but with small enclosed patios or gardens, safe enclosed communal open spaces for children to play in, and "Individual" off-street parking for two cars per house unit. (This to give space for a vehicle used for "Working from home ") (See para 1.5 below) *Note 1.	Comment noted. No change.
		I know of a very good, highly successful modern "High density" Suffolk village development recently completed in the ANOB (?) area of Rendlesham Village. It is "Sycamore Drive" IP12 2GF. Architects Anglia design Norwich and builders Elvin Property developments. It illustrates what I am describing.	Comment noted. No change.
		1.5 Working from home (see my comment on CNDP 6 (p.37)1.6 Page 25 para 5.5	See below.
		The red line of Map 4 should encompass the houseboats so that they are subject to the general provisions of the objective.	Red line is village boundary. Houseboats subject to different Local Plan policy. No change.

Reference	Respondent	Comment Summary	Suggested response
		Map 5. The houseboats should be within the conservation area as they are of great unique, original *historical, and heritage value as a group of vintage ex-working vessels and barge conversions.	Conservation Area boundary cannot be changed through NDP – no change.
		CNDP 4 pp 33-34 Impact of views We strongly object to the "ribbon development" planned for the open fields on the southside of the B1456 west of Lings Lane. It would be very much better if that development was off the west side of Lings Lane itself between the main road and the first house of Lings Lane hamlet (modify red boundary line maps 3a, 3 and 4,6).	Comment noted. No change.
		CNDP4 Heritage Assets Page 29 Add CNDP 4/15 Vintage Barns at Webb's Boatyard 4/16 Brick "Coal Store" barn facing the hard (backing on to proposed /15) 1 CNDP 7 Page 38, 5.21/1 Pedestrian road, road crossing between Hollingsworth and the hairdressers "His & Hers" and one by the bus stop at Lings Lane 5.21/2 Full agree with re-siting 30 limit to Bylam Lane plus white painted fence "Gates" on each verge side similar to that entrance to Shotley. Very effective "Traffic calming" feature we find.	Group to consider these additions. Add pedestrian crossings as Parish Council Supporting Action. – NO ref to crossings.
		5.21/7 Provide dedicated cycle lane on the B14S6 and footpath where currently none.	Comment noted. No change.

Reference	Respondent	Comment Summary	Suggested response
		Para 5. 21/7 There needs to be a bus shelter beside the "Red Lion". Not practicable to use the concrete one opposite for people going to Ipswich. 5.21/4 Adequate parking" should all be off-road and designed in total to number 2 for every new home (some could be in a communal residents' parking lot like that in St. Andrews drive. (See also comment 1.4 of CNDP I and 2). Every parking area above should have an electric car charging socket fitted in all new build homes.	Add as Parish Council Supporting Action. Comment noted. No change.
		CNDP objective 6 (P37) policy CS2/CS11 (P17) 1. Business and economic development 1.1 Space should be allocated for light industrial artisan workshops units within the village red boundary zone to rent, or the zone increased to provide it specifically underutilised or disused farm buildings should be designated and an example of this is the use of barns in Church Farm for manufacturing incubators for the game bird business, and similar semiderelict farm buildings down Lings Lane* (see note 2) and similarly at Cordle's farm on the main road going out towards Shotley. Many other local villages already have these units (Harkstead etc.) 1.2 The current pandemic has emphasised the utility of WORKING FROM HOME. This accelerates an already existing trend. All new homes should have a designated "work Room" which is not a bedroom or an extra normal living room. It could be where previously a garage was planned	Comments noted. Chelpin does not seek to allocate such sites. Any proposals would be assessed against development plan policy, including the NDP.

Reference	Respondent	Comment Summary	Suggested response
R067	Resident	Support	Support noted.
R068	Resident	General support. Plan takes account of national and strategic planning policy and promotes sustainable development.	Support noted.
		However crucial natural environment is protected.	Comment noted, alongside other policy Chelpin seeks to do this.
		Against new development, this should only take place in the village boundary and should take account of previous amount of development.	Chelpin has to plan positively so cannot be against development. Chelpin seeks to guide development to within village boundary. No change.
R069	Resident	Support	Support noted.
R070	Resident	Resident of 73 years who loves the village. Over the years seen much development e.g. at Woodlands. With careful thought there is no need to think that well-planned development could not continue to be the community and local services. AONB was designated without consultation in the 1960s – one area in particular front meadow at Hill Farm is inappropriate.	Comments noted. No change.
R071	Resident	Support	Support noted.
R072	Resident	Support	Support noted.
R073	Resident	Support	Support noted.
R074	Resident	Support	Support noted.
R075	Resident	Support	Support noted.
R076	Resident	Support	Support noted.
R077	Resident	Support	Support noted.

Reference	Respondent	Comment Summary	Suggested response
R078	Resident	Support	Support noted.
R079	Resident	Support	Support noted.
R080	Resident	Support	Support noted.
R081	Resident	I should like to thank you for taking on this enormous task. My greatest fear is the design of the buildings. We must at all costs prevent a development such as the recent one at Holbrook, which is appalling. Almost 200 years ago the beautiful village of Woolverstone was created. It is a wonderful example of mixed housing designed to a high standard specifically for a RURAL setting. Surely we can demand that our new development employs a sympathetic architect to echo those same standards but fit for the 21st century. Last year the RIBA awarded their first prize to Norwich City Council for a beautifully designed, low cost development. Can we not attempt to achieve a similar result here, in our precious countryside? It would be helpful to know where we can find examples of good practice elsewhere in the country so that we can show the planners what is possible and what our expectations are!	Support noted, Chelpin seeks to secure good design.
R082	Resident	I would like to thank everyone involved for their careful thought in putting together this plan and would like to express my support for it. I moved to Chelmondiston from the Pinewood/Belstead area due to the increased traffic noise and continual housing developments in that area. Chemondiston was perfect for being a bit quieter with nearby walks and countryside and still conveniently on a direct public transport link to Ipswich where I work. I appreciate everyone working to protect the area. My only concern is the statement of 'we wish to see the enhancement of sports and recreational facilities'; this is not particularly clear. There is a huge difference between getting a local team together or offering yoga sessions in the town hall versus building a swimming pool or something like that.	Support noted.
R083	Resident	Support	Support noted.
R084	Resident	Support	Support noted.

Reference	Respondent	Comment Summary	Suggested response
R085	Resident	Move speed sign to Bylams Lane – this would reduce speeding.	Neither of these are land use planning
		Houseboats – sewage washes back into marsh at Pin Mill.	matters. No change.
R086	Resident	Policy CNDP8 - List Pin Mill Sailing Club as leisure facility.	Incorrect policy reference. Policy CNDP9 protects recreation facilities. Add to CNDP9?
		Support for actions under Objective 7 – general support for plan.	Supporting comments noted.

Reference	Respondent	Comment Summary	Suggested response
R087	Resident	In general, we must say we are very impressed with the plan and very appreciative of the considerable effort and hard work this represents. It is quite clear from the Settlement Boundary indicated on Map 4, Page 24 that the only extensive tract of land scheduled for potential development is that to the north and far west of the Settlement Boundary, accessed through either the end of Woodlands or Robinson's Lane.	Supporting Comments noted.
		We would object strongly to the development of this piece of land for the following reasons: 1) The substantial housing development proposed for HMS Ganges in Shotley Gate is going to provide more than ample additional housing for the Shotley Peninsula, in addition to extensive housing being provided in the wider lipswich area. The development of this particular tract of land in Chelmondiston appears to be opportunistic, rather than in any way necessary for housing stock. 2) The existing road network on the Shotley Peninsula will be put under considerable strain by the HMS Ganges development, and this would be unnecessarily compounded by creating future traffic volume with this development in Chelmondiston, notwithstanding the extra traffic accessing the development via Woodlands and past the Primary School. 3) The development of this tract of land would create considerable noise and light pollution that would be highly undesirable in an area of such natural beauty. In short, any further extensive housing development of Chelmondiston, including that referred to in this objection, appears to be merely the opportunistic initiative of a housing developer, rather than the necessary provision of a meaningful village development plan. The Settlement Boundary should be redrawn to exclude this particular tract of land, and further housing development in Chelmondiston limited to a very bare minimum to preserve the unique character of this delightful corner of Suffolk.	Objection noted. Map 4 settlement boundary reflects that in the emerging Joint Local Plan – no change.
R100-r152	Residents via email	All in support of the plan.	Support noted.

Table 4 Landowners and Developers

Savills

Reference	Comment Summary	Suggested response
R036 Savills	Savills (UK) Ltd is instructed by the Landowners of Land north of Main Road, Chelmondiston to submit representations in response to the Chelmondiston Neighbourhood Plan (Chelpin) Regulation 14 Consultation, closing date 1st September 2020.	
	Broad support is given to Chelmondiston Parish Council for the preparation of a draft Neighbourhood Plan however we have set out below a number of comments for consideration as the Neighbourhood Plan progresses to the next stage of consultation and then Examination. As you will be aware it is necessary for Neighbourhood Plans to meet the basic conditions which include the requirements to seek to contribute to achieving sustainable development and to have regard to national policies and guidance.	Support noted.
	National Planning Policy Context The National Planning Policy Framework 2019 (NPPF) establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. The three objectives of sustainable development, as set out in the NPPF, require the planning system to perform an economic, social and environmental role. Paragraph 8 of the NPPF explains:	Comments on national planning policy noted. It is not a requirement for NDPs to allocate sites. Chelpin does not do this. The settlement boundaries will be defined in the Joint Local Plan. No change.
	d) an economic objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;	

Reference	Comment Summary	Suggested response
	e) a social objective 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 present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities health, social and cultural wellbeing; and	
	f) an environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.	
	For plan making, Paragraph 11 of the NPPF, requires that Local Planning Authorities positively seek opportunities to meet the development needs of their area.	
	Paragraph 78 of the NPPF outlines to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It notes that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby. Residential development in such settlements can make a significant contribution to the maintenance and continuing provision of local services and facilities for community use, as supported by paragraph 83 of the NPPF in relation to Supporting a Prosperous Rural Economy.	

Reference	Comment Summary	Suggested response
	In respect of housing delivery, the NPPF recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, as they are often built-out relatively quickly (paragraph 68).	
	It is therefore important that the emerging Neighbourhood Plan pursues a development strategy which allows for the growth of Chelmondiston as a means of ensuring its long term sustainability. An approach to growth which allows for development at an appropriate scale, triggering the provision of affordable housing, is vital.	
	Chelmondiston Neighbourhood Plan Regulation 14 Consultation Document, July 2020	
	The focus of the comments made on behalf of our client relate to the following policies: Policy CNDP1 New Housing Development within Settlement Boundaries Map 4 Policies Map Policy CNDP2 Design Principles Policy CNDP7 Conserving and Enhancing Valued Landscapes and Biodiversity	
	Planning Policy Context	
	For a Neighbourhood Plan to proceed to a referendum it must meet a set of basic conditions	
	Section 4 of the Draft Neighbourhood Plan explains the relevant planning making reference to the adopted Core Strategy and emerging Babergh and Mid Suffolk Local Plan. It is unclear from the	

Reference	Comment Summary	Suggested response
Reference	available documentation whether Chelmondiston Parish Council intends to process the Neighbourhood Plan in advance of the emerging Draft Local Plan, or following the adoption of the emerging Local Plan. This is necessary so that the Parish Council can take relevant steps to meet the basic conditions Given the inclusion of the emerging Draft Local Plan Policy Map extracts, it would suggest that the Neighbourhood Plan intends to follow the adoption of the Draft Local Plan. It is recommended that the Neighbourhood Plan follows the adoption of the emerging Babergh and Mid Suffolk Joint Local Plan to be able to rely upon the Dc's evidence base and to seek to avoid the situation where the Neighbourhood Plan could quickly be afforded reduced weight in decisions about planning applications if there is conflict with the overarching Joint Local Plan. Remedy: It is recommended that the Parish Council confirms the emerging Neighbourhood Plan is intended to be made following the adoption of the emerging Babergh and Mid Suffolk Joint Local Plan. This approach will provide longevity to the Neighbourhood Plan.	In line with government guidance the Chelpin will progress ahead of
	This approach will provide longevity to the Neighbourhood Flam.	the emerging Joint Local Plan. The plan will be examined against the development plan at the time, not the emerging plan. No change.
	Policy CNDP1 - New Housing Development within Settlement	
	Boundaries	

Reference	Comment Summary	Suggested response
Reference	Objection Draft Policy CNDP 1 does not propose to allocate any sites for residential development. Part of the Vision for Chelmondiston states: By 2036 any development will have been sustainable, with the necessary infrastructure "a place that is thriving and enjoyable for residents, local businesses and visitors" Relevant objectives of the Neighbourhood Plan are: 1. To help manage future housing growth and to meet local housing needs within the neighbourhood area. 5. To protect and enhance community and recreation facilities. 7. To ensure that the area has appropriate levels of infrastructure. It is clear that Chelmondiston benefits from a number of existing services and facilities which can support additional residential development. Babergh's Settlement Hierarchy Assessment 2019 identifies the following available facilities: Convenience store Post Office Food and drink outlet Other retail Pre-School Primary School Village Hall Places of Worship Bus service operating at peak times Recreation ground Super-fast broadband	Suggested response

Reference	Comment Summary	Suggested response
	It is particularly important that Chelmondiston is not be viewed in isolation, but as part of a wider network of settlements in this part of Suffolk all of which work together to provide a critical mass to support local services. It is important to recognise the opportunity new homes provide to help sustain existing services and facilities.	
	The Adopted Development Plan comprises of the Babergh Core Strategy & Policies DPD (2014) and relates to the plan period 2011 to 2031. It is noted that the front cover of the Draft Neighbourhood Plan identifies that the plan period is intended to be 2020 to 2036, extending the current Development Plan by 5 years.	
	Paragraph 33 of the NPPF rei Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary The Babergh Core Strategy was adopted some 6 years ago. In accordance with requirements the Council has taken the decision to prepare a new Local Plan jointly with Mid Suffolk.	
	In respect of the housing requirement for emerging Neighbourhood Plans, in instances where strategic policies for housing are out of date as is the case for Chelmondiston, para 66 of the NPPF states	
	Where it is not possible to provide a requirement figure for a neighbourhood area the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority	

Reference	Comment Summary	Suggested response
	The Regulation 18 Draft Joint Local Plan was the subject of consultation in July and September 2019. At that time, Babergh	
	Council suggested for the period to 2036 Chelmondiston	
	Neighbourhood Plan should be planning for a minimum of 52 new	
	homes (Table 4), draft Policy SP04 specifically states:	
	In order to assist with delivery of the overall district housing need requirements, designated Neighbourhood Plan areas will be expected to plan to deliver the minimum housing requirements set out in Table 4 between 2018 and 2036.	
	Despite this clear direction, the draft Neighbourhood Plan does not propose to make any allocations. As a consequence there is concern that the overall spatial strategy for Babergh will be compromised.	
	It is noted in recent years that Babergh Council has not been able to demonstrate a five year housing land supply which resulted in a number of speculative applications for residential development, including sites at Chelmondiston (Land west of Woodlands, Chelmondiston LPA Refs: DC/18/00236 and DC/19/01634). The identification of an appropriate site for allocation within the emerging Neighbourhood Plan can help to prevent speculative applications and would take a positive, planned approach to development.	
	Within the National Planning Policy Framework, paragraph 14 provides an additional level of protection to neighbourhood plan areas where the District Council has a shortfall in housing land supply. It states: 14. In situations where the presumption (at paragraph 11d) applies to	
	applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is	

Reference	Comment Summary	Suggested response
Reference	likely to significantly and demonstrably outweigh the benefits, provided all of the following apply: a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made; e) the neighbourhood plan contains policies and allocations to meet its identified housing requirement; f) the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and d) the lpas housing delivery was at least 45% of that required over the previous three years. As there are no allocations contained within the draft Neighbourhood Plan, Chelmondiston would not be able to benefit from the above	Suggested response
	additional level of protection. Furthermore, a recent legal judgement has confirmed that it is not sufficient to simply rely on the identification of committed development (i.e. sites already benefitting from planning permission) within Neighbourhood Plans. As such it is necessary to identify new sites for residential allocation to benefit from this additional level of protection.	
	New development can create a number of benefits. Small to medium sized development it can provide a mix housing types and sizes, including affordable housing responding to local needs. A further direct benefit is the receipt of additional CIL funding which can be used to support local infrastructure schemes. It is acknowledged that once the Neighbourhood Plan is made, the PC will receive an increase in the Community Infrastructure Levy of at least 25% instead of 15% However, as the Neighbourhood Plan does not propose to identify any allocations, there will be very limited opportunity for additional CIL income to be forthcoming. Furthermore it	

Reference		Suggested response
	is noted that objective 5 of the Draft Neighbourhood Plan is To protect and enhance community and recreation facilities It is therefore questioned how the plan seeks to meet this objective to not only protect but to enhance recreation facilities without relevant funding.	
	Remedy: • A revision to Draft Policy CNDP 1 is required to plan for additional housing at Chelmondiston to respond to the 52 dwelling requirement identified in the emerging Joint Babergh Mid Suffolk Local Plan. • Development of this scale will deliver associated affordable housing in accordance with District policy requirements. • In addition, this increased population will also support the retention of existing facilities at the settlement.	NDPs are not required to allocate sites. No change.
	Land north of Main Road, Chelmondiston should be identified for residential allocation. Suggested policy wording: Land north of Main Road, Chelmondiston is allocated for residential development: e) The development of the site will accommodate approximately up to 40 dwellings (subject to discussion). f) Access to the site can be taken from Main Road. g) The development layout will be designed in order to respect the living conditions and amenity of the residents to the east and west of the site. h) Incorporate appropriate landscape mitigation measures.	Comments noted. There is no requirement to allocate a site. No change.
	We would welcome the opportunity to explore the options, including the scale of development, with the Neighbourhood Plan Steering Group.	
	Map 4 Policies Map	

Reference	Comment Summary	Suggested response
	It is noted that the draft Policies Map for the Neighbourhood Plan proposes to replicate the settlement boundaries as proposed within the emerging Babergh and Mid Suffolk Local Plan. For the reasons stated above, it is recommended that the Neighbourhood Plan amends the extent of the settlement boundary so that Land north of Main Road, Chelmondiston is located within the settlement boundary.	The settlement boundary is a matter for the Joint Local Plan. No change.
	Policy CNDP2 - Design Principles	
	Support is given to Draft Policy CNDP2 as it is clear that design has an important role to play in the delivery of new development at Chelmondiston which responds positively to the character of the settlement.	Support noted.
	The draft Neighbourhood Plan has aspirations for good design, where appropriate the use of traditional materials and energy efficient homes.	
	Policy CNDP7 Conserving and Enhancing Valued Landscapes and	
	Biodiversity	There is no requirement
	It is noted that the National Planning Policy Framework affords great weight to conserving and enhancing landscape designated within Areas of Outstanding Natural Beauty (para 172). However consideration needs to be balanced against the need to fulfil economic and social objectives (as provided at page 1 of this response).	to allocate a site. No change. National planning policy is such areas is that development should be restricted.
	Draft Babergh and Mid Suffolk Local Plan Policy LP19	

Reference	Comment Summary	Suggested response
	AONB states: a.1. The Councils will support development in or near the AONBs that: d. Gives great weight to conserving and enhancing the landscape and scenic beauty; e. Does not adversely affect the character, quality views and distinctiveness of the AONB or threaten public enjoyment of these areas; and f. Supports the wider environmental, social and economic objectives as set out in the AONB Management Plan	
	As such, the overarching policy context enables for the provision of carefully planned development within the AONB where it is justified. It is recommended that the Neighbourhood Plan makes an allocation for residential development to ensure that the identified housing needs are met in a planned approach, as discussed in detail above. Through the allocation process it will be necessary to consider the landscape impacts of development so that judgements can be made about where new homes should be directed. As part of this process consideration can also be given to the opportunity the site would have to incorporate appropriate landscaping.	
	It is noted that draft Policy CNDP7 proposes a number of specific policy criteria. Para 5.14 states Policy CNDP7 has been developed by using a wide variety of evidence sources, including work carried out for the VDF It is requested that relevant evidence for the Draft Neighbourhood Plan should be made available and it should robustly justify the proposed policy criteria. It is requested that this is made available for consideration as part of the next round of consultation (Regulation 16).	Make available the evidence base.

Reference	,	Suggested response
	As stated above, Land north of Main Road, Chelmondiston is promoted for residential allocation. It is acknowledged that this site is located within the AONB. This site is also located immediately to the west of Land west of Woodlands, Chelmondiston which was recently the subject of a speculative planning application which was granted planning permission by Babergh District Council (LPA Refs: DC/18/00236 and DC/19/01634).	
	It is requested that consideration is given to the Land north of Main Road, Chelmondiston as an edge of settlement location for new housing at Chelmondiston. There are existing hedgerows and trees to the south and west of the site. As part of comprehensively planned development, potentially concentrated at the northern part of the site, there is the opportunity for enhanced landscaping, particularly at the western edge of Chelmondiston.	
	Conclusion	
	It is important that the Neighbourhood Plan is considered within the context of national policy which continues to focus on the importance of growth and housing in rural areas. The inclusion of a sufficient amount of housing growth is vital to the long term sustainability of this rural community. Development is essential to secure the future of services and facilities in the local area, which are key to the long term sustainability of rural communities.	See previous recommended response.

Vistry Group

Section of Plan	Vistry Response	Suggested Response
Chapter 2	Key Issues	

Section of Plan	Vistry Response	Suggested Response
	How much future development? What and where?	
	3.1 The response sited in relation to the delivery of new houses 'on infill sites or previously developed sites and otherwise on a small scale - single or small groups of houses that relate well to the neighbouring environment', does not reflect the objective set out later in the Plan	
	(CNDP Objective 1), or the corresponding policy (CNDP1 New Housing Development within Settlement Boundaries).	
	3.2 It is considered that it would be more effective for the 'response' sited to state that new development should be delivered within the defined settlement boundary and on suitable sites that relate well to the existing settlement, where it is demonstrated that they are required to meet an identified local need. As is set out in detail in section 5 of these representations, the settlement boundary should be include additional sites, including land at Hill Farm, Chelmondiston, in order to give greater certainty to the local community, developers and the Local Planning Authority and ensure that a specific supply of identifiable sites can be identified over the plan period.	Comment noted. No change. It is not a requirement for NDPs to allocate sites.
	3.3 Furthermore, the amount or type of development to be provided within the Parish is not addressed. The Neighbourhood Plan should seek to ensure that new development serves to meet local housing need and contribute to housing delivery both in the neighbourhood area and the wider district, which should be the intention of the current planning system. As discussed in more detail in section 5 of these representations, the draft JLP prescribes a minimum housing requirement figure for Neighbourhood Areas, in order to assist the formation and progression of emerging Neighbourhood Plans, and reference should be made to these.	Noted. No change.
	3.4 It is acknowledged that great weight should be given to conserving and enhancing sites of landscape, cultural and ecological importance, and this is supported by Vistry Group.	Comment noted. No change.

Section of Plan	Vistry Response	Suggested Response
	However, suggesting a blanket restriction of development in designated areas does not align with the provisions of national planning policy, which states (NPPF, paragraph 172) that "The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated." It is considered that the wording of this sentence should be amended to better reflect the provisions of the NPPF.	
	Caring for the natural environment. 3.5 It is suggested that it would also be appropriate to include consideration of the impact on biodiversity.	Comment noted. No change.
	What should new buildings look like? 3.6 It is suggested that reference could be included to The Suffolk Design Guide for Residential Areas or any future revisions, which provides the supplementary planning guidance used by all local authorities in Suffolk.	Add in reference.
	What community facilities do we need? 3.7 It would be beneficial to make reference to how the need for community facilities has been identified.	Comment noted. No change.
	What adequate supporting infrastructure do we need? 3.8 It would be beneficial to make reference to how the need for supporting infrastructure has been identified, and to provide a definitive list of the infrastructure/facilities that have been identified as being required to support the Parish through the plan period.	Comment noted. No change.
	Vision 3.9 To accord with the NPPF (2019) it is suggested that the wording of the Vision should be amended as follows: "To conserve and enhance the unique rural"	Comment noted. No change.

Section of Plan	Vistry Response	Suggested Response
	character of the Parish of Chelmondiston, its built and natural assets with particular reference to the historic environment of the Pin Mill Conservation Area, the landscape and scenic beauty of the Suffolk Coast and Heath Area of Outstanding Natural Beauty, and significance of other designated areas within the Parish, including SSSIs and RAMSAR sites. All new development to 2036 will be sustainable, supported by necessary infrastructure to contribute to a place that is thriving and enjoyable for residents, local businesses and visitors"	35
	Objectives 1. To help manage future housing growth and to meet local housing needs within the neighbourhood area. 3.10 This objective should reflect the requirement to meet local housing needs and	There is no requirement for NDPs to allocate sites. No change.
	contribute to housing delivery both in the neighbourhood area and the wider district.	
Chapter 4	4.1 National policy and guidance requires that Neighbourhood Plans are in general conformity with the adopted Local Plan in their area. However, it is noted that the Babergh Local Plan is outdated and work on the emerging Babergh and Mid Suffolk Joint Local Plan is still taking place. The Chelpin Plan will need to be flexible and robust to ensure that it can satisfy the Neighbourhood Planning regulations and basic conditions tests at the point of submission and examination.	Comment noted. No change. National Planning Practice Guidance sets out the regard NDPs should take of emerging plans – the Chelpin has been prepared in line with this.
	4.2 It is noted that paragraph 4.2 states that "Strategic planning policy is changing through the new Babergh and Mid Suffolk Joint Local Plan (JLP). The Chelpin Plan does not have to be in general conformity with this emerging plan…". As the draft JLP gains more weight as it progresses through to examination, and given that it is likely that the draft JLP could be adopted (winter 2021/22) ahead of the emerging neighbourhood Plan, it is considered appropriate that the preparation of the Chelpin Plan should see to be in general conformity with the emerging JLP.	The Chelpin cannot be in general conformity with an emerging plan – no change.
	4.3 The Chelpin Plan is proposing to use the settlement boundaries included within the emerging Local Plan, which, as yet, has only been subject to preferred options consultation.	Comment noted. No change. The Chelpin can be amended if necessary. Should the settlement boundary change in the JLP after the Chelpin is
	Depending on timescales, this could result in a position where the settlement boundary is amended by the Local Plan when the Chelpin Plan is at an advanced	made this would supersede the boundary in the Chelpin.

Section of Plan	Vistry Response	Suggested Response
	stage. This does not therefore provide the Chelpin Plan with a robust policy background, supported by evidence.	
	If the emerging Local Plan changes in the next iteration or during examination then that will result in changes being required to the Chelpin Plan, or the Neighbourhood Plan would be based on incorrect documents.	
Chapter 5	Map 4. Policies Map; Housing and Design; CNDP OBJECTIVE 1; Policy CNDP1 New Housing Development within Settlement Boundaries; Paragraph 5.4	
	5.1 It is noted there are no formal housing site allocations proposed by the Chelpin Plan.	
	However, the settlement boundaries proposed would follow that presented under the emerging JLP, which proposes revisions to the current boundaries to incorporate additional land to accommodate planned growth.	
	5.2 The draft JLP prescribes a <i>minimum</i> housing requirement figure for Neighbourhood Areas, in order to assist the formation and progression of emerging Neighbourhood Plans. Paragraphs 9.3 and 9.4 of the draft JLP notes that, "9.3 In identifying the respective NP requirement figures, the Councils have been mindful of their duty to ensure that the overall district Plan requirement figures can be met. 9.4 All outstanding dwellings (yet to be built) with planning permission as at 1st April 2018 have been assumed, leaving a residual amount to be found from new development locations. The total housing numbers in the Plan have been identified by combining the outstanding dwellings with planning permission as at 1st April 2018, with new development locations set out in the Plan."	
	5.3 In relation to the 'preferred approach' to housing delivery, the draft JLP states at paragraph 9.7 that "The spatial distribution of housing set out in this Plan seeks to secure a balance to growth in the strategic transport corridor areas, as well as ensuring that other market towns and rural communities benefit from appropriate growth. The Councils will closely monitor the ongoing annual delivery rates of housing across the Plan area and will	

Section of Plan	Vistry Response	Suggested Response
	take appropriate, proactive action, if it is required to address delivery performance issues." 5.4 The housing requirement for NP Areas is set out in Table 4 of the draft JLP (page 40). For Chelmondiston this is set at 52 homes. These are minimum figures and include outstanding planning permissions granted as at 1st April 2018. 5.5 There is no reference within the Chelpin Plan to this minimum requirement for the neighbourhood plan area, as prescribed by the draft JLP.	There is no requirement on the Chelpin to identify site the Chelpin defers to the JLP on this matter and the definition of settlement boundaries. No change.
	5.6 Within the revised draft JLP settlement boundary for Chelmondiston, two new sites have been included: Land east of Richardson Lane, Chelmondiston: BMSDC 2019 SHELAA Ref. SS0872 Outline Planning Permission Ref.: DC/18/00236 - 24 dwellings (including 8 affordable dwellings). Granted July 2018 Land south of B1456, Chelmondiston BMSDC 2019 SHELAA Ref. SS0872 Estimated yield 15 dwellings Estimated delivery 0-5 years	
	5.7 As the details above indicate, development of 24 dwellings has been approved for land east of Richardson Lane, and it is anticipated that this development will come forward in the immediate term.	Comments noted. These comments should be addressed to those preparing the JLP. No change.
	5.8 Land south of B1456 does not benefit from planning permission at the current time. It is not clear why this site has been selected in the draft JLP, and the Chelpin Plan. Whilst it is recognised it fronts the road and it is located outside the AONB, it is surrounded to the south and west by open countryside. It is considered there are sites, such as at the land at Hill Farm Lane, which are better related to the settlement and existing built development. In particular the land at Hill Farm Lane is surrounded by built development, and the existing settlement boundary on 3.5 sides. Given the current irrational settlement boundary, the site has the ability to be enclosed. This would help mitigate any potential impact on the landscape.	These comment should be addressed through the emerging JLP. No change.

Section of Plan	Vistry Response	Suggested Response
	5.9 Based on the details available through the BMSDC SHELAA (2019) and planning permission records, collectively the two sites have the potential to deliver 39 dwellings, leaving a remaining 13 dwellings to come forward through windfall development in order to meet the expected <i>minimum</i> requirement for the Neighbourhood Plan Area.	
	5.10 No evidence has been presented to demonstrate the likelihood that this residual need can be met through windfall development, and it is considered to be questionable, given the potential limited number of suitable/available sites and constraints to development within the settlement boundary.	
	5.11 Furthermore, windfall developments (assuming they are small scale infill developments) would not be able to provide for, or effectively contribute to, the infrastructure requirements of the Parish as outlined in the Plan. Nor would they deliver the varied mix of housing types or affordable housing provision required to provide fully for the needs of the community, or to provide choice for residents.	
	5.12 In addition, the deliverability of the land south of B1456 has not been demonstrated.	
	5.13 Vistry Group are concerned that a high proportion of the planned development for Chelmondiston is heavily based on existing commitments and it does not plan sufficient new growth over the plan period. The two sites included within the revised settlement boundary are suggested to come forward in the early part of the plan period, and there is no further provision included for the mid or later years of the plan period, or beyond.	
	5.14 It is has not been demonstrated that the <i>minimum</i> housing requirement for the Neighbourhood Plan Area can be met through the proposed revised settlement boundary alone. As such, the Chelpin Plan can not be considered to include sufficient provision to meet the housing need of the neighbourhood area or the wider district. On this basis the Chelpin Plan would fail to accord with National Planning Policy.	
	5.15 In addition, without providing sufficient allocation of sites for new development, and given the undemonstrated deliverability of land south of B1456 and windfall	

Section of Plan	Vistry Response	Suggested Response
	development, the Parish would leave itself vulnerable to speculative development which is looking to provide for the local housing needs of the community.	
	5.16 Chelmondiston is a well-served Parish in the heart of the Shotley Peninsular. The Parish has evolved over centuries, with its heritage still evident throughout, which adds to much of the settlement's character. Parish benefits from a number of key facilities and services, including the Primary School, convenience shops, takeaways, public houses, places of worship, and also public transport links. The draft Chelpin Plan states that the average age of the Parish's population is slightly higher than the Suffolk average (paragraph 3.15), and that a significant number of properties in the Parish are 'second homes' (paragraph 3.13). As such, it is appropriate to ensure that a sufficient supply of suitable and attainable housing, including Affordable Housing, as well as services and facilities, can be provided in appropriate locations through the plan period and beyond, to meet the needs of local residents, whether they be younger people or those of later years, and fulfil the social objection of sustainable development in supporting a 'strong, vibrant and healthy community' (NPPF paragraph 8).	
	5.17 Chelmondiston is identified within the draft JLP as a Babergh Hinterland Village. Whilst it is recognised that larger settlements are the focus for development, it is considered that additional growth could be accommodated within Chelmondiston. Within the BMSDC Settlement Hierarchy Review Topic Paper (July 2019), it identifies Core Villages as locations which score 18 points and over, whilst Hinterland Villages are designated based on scores of 9 to 17 points. No explanation is given as to how the thresholds were set. Chelmondiston scores 17 points, and therefore misses out by a single point to be identified as a Core Village. Chelmondiston was previously identified as a Core Village in the BMSDC JLP Regulation 18 consultation document in 2017. It is understood this was based on the Council's initial preferred option to review settlements recognising their relationships to higher order settlements, key services and supporting services. There is no explanation why this approach changed, and Chelmondiston downgraded to a Hinterland Village as a result.	
	5.18 It is clear that Chelmondiston performs significantly better than other Hinterland Villages in relation to the settlement hierarchy. In addition, further consideration should be given to the strategic location of Chelmondiston. It is a very sustainable location and, as noted above, with the range of services and	

Section of Plan	Vistry Response	Suggested Response
	facilities available locally and proximity to the A12/A14 and pswich, it is capable of accommodating additional small and medium sites. It is recognised that that a significant proportion of Chelmondiston is covered by the Suffolk Coast and Heaths AONB. However, this does not prevent well planned development from coming forward, which still ensures great weight is afforded to conserving and enhancing the landscape and scenic beauty.	
	5.19 It is considered that the approach to growth applied for Chelmondiston should be similar to other areas in the district, where additional growth has been planned for, and it does not heavily rely on existing consents. Other settlements with similar attributes (such as Copdock and Washbrook, and Capel St Mary) are indicated to accommodate significantly more development.	
	5.20 Aside from following the revised settlement boundary of the draft JLP, there appears to be no explanation of the rational for not including formal allocations in Chelmondiston.	
	5.21 To assist with delivery, additional smaller and medium scale sites should be allocated or included within the revised settlement boundary, to rectify any potential delivery issues, and guard against a shortfall in delivery and unmet need across the plan period. This approach is recognised by the NPPF (Paragraph 68) which states "small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly". It is considered that Chelmondiston could appropriately accommodate growth from additional small and medium sites, and that the proposals for land at Hill Farm, Chelmondiston would provide a suitable and deliverable site for inclusion.	
	5.22 It is noted that the Policy makes reference to the 'Proposals Map', which is referred to elsewhere as the 'Policies Map' (e.g. Map 4; paragraph 4.9; and paragraph 5.2). It is suggested that a consistent approach is applied, and that references are clear in making distinction from the Proposals Map of the adopted/emerging Local Plan.	Amend references if necessary.
	CNDP OBJECTIVE 1 - To help manage future housing growth and to meet local housing needs within the neighbourhood area.	

Section of Plan	Vistry Response	Suggested Response
	5.23 In addition to the comments above, the following comments relate to CNDP OBJECTIVE 1.	
	5.24 It is right that the draft Chelpin Plan should seek to secure development that meets the needs of the local community. However, as previously noted, this objective should reflect the requirement to meet local housing needs and contribute to housing delivery both in the neighbourhood area and the wider district, in order to satisfy the requirements of the emerging Local Plan. The proposals for land at	Noted. There is no requirement for NDPs to allocate sites.
	Hill Farm, Chelmondiston would provide a suitable and deliverable development that would contribute towards achieving this.	This objective is addressed in the Chelpin. No change.
	5.25 In order to align with national planning policy, it is considered that there should be clearer acknowledgement of the social objective of sustainable development – "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 present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing" (NPPF, 2019, paragraph 8).	
	Policy CNDP2 Design Principles	Policy to be reviewed.
	5.26 It is suggested that the wording within the opening paragraph of Policy CNDP2 requires further clarity of the 'key attributes' and 'key local design features' of the area, to ensure that new development responds appropriately.	
	5.27 It is considered that the policy wording should make reference to the ANOB.	Add in reference.
	5.28 It is also recommended that reference is included to The Suffolk Design Guide for Residential Areas (or later revisions), which provides the supplementary planning guidance used by all local authorities in Suffolk.	
	Heritage CNDP OBJECTIVE 2 - To conserve and enhance the character of the neighbourhood area.	Comment noted. No change.

Section of Plan	Vistry Response	Suggested Response
	5.29 It is suggested that the wording of CNDP Objective 2 is too vague and it is recommended that, if the objective is seeking to relate to the area's historic character, it would be better worded as follows, in order to provide consistency with the NPPF (2019): "To conserve and enhance the historic environment of the neighbourhood area"	

Copy of Vistry Group Representation - Introductory sections and proposed site allocation

Representations to Chelpin Plan, Regulation 14 Pre-submission Draft (July 2020) | Land at Hill Farm, Chelmondiston

1. INTRODUCTION

- 1.1 These representations are submitted by Boyer on behalf of Vistry Group in response to the publication of the Regulation 14 Pre-submission Draft Chelmondiston Neighbourhood Development Plan ('Chelpin Plan') 2020-2036.
- 1.2 These representations make specific reference to land at Hill Farm, Cheimondiston ("the Site") as illustrated in the Proposed Concept Masterplan at Appendix One.
- 1.3 The Site has previously been promoted for future residential development through the 'Call for Site' process and representations to the Babergh and Mid Suffolk Draft Joint Local Plan (hereafter referred to as 'the Draft JLP').
- 1.4 The draft Chelpin Plan document has been reviewed in its own context, but also in relation to the Site. Detail of the Site and the proposals for development are provided in Section 2. Our comments, on behalf of Vistry Group, to relevant chapters of the Chelpin Plan are set out in Sections 3. 4 and 5 below, and reflect the order and sequence of the consultation document.
- 1.5 The comments provided in these representations are intended to be informative and helpful to the further refinement and progression of the draft Chelpin Plan prior to submission.
- 1.6 Vistry Group support the production of a Neighbourhood Plan for the village, which positively enables local residents to guide development in their area.
- 1.7 From our review, the general principles of the draft Chelpin Plan appear to be sound, and the context of the policies and objectives appear to be locally based. As such, in principle, the Plan would fulfill its' role effectively as the 'local' element of the 'Development Plan'.
- 1.8 However, when considered against the necessary Basic Conditions as required by Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (Inserted by the Localism Act 2011), it is our view that, as currently drafted, the Chelpin Plan is not in conformity with National Planning Policy and would not contribute to the achievement of sustainable development, and a such would fail to meet the necessary Basic Conditions.

2. LAND AT HILL FARM, CHELMONDISTON

- 2.1 Vistry Group are actively promoting the land at Hill Farm, Chelmondiston for residential development.
- 2.2 The Site extends to approximately 2.59ha and is a flat, agricultural field, well related to Chelmondiston. The Site is surrounded by but if development to the north, west, south and to the east. It also adjoins the settlement boundary along the western and southern boundaries, and also partly along the eastern boundary.
- 2.3 There is an existing access to the Site from Hill Farm, via Hill Farm Lane and Hollow Lane. A Public Right of Way is located along the western and northern boundaries.
- 2.4 The site's position on the edge of Chelmondiston provides a very sustainable location for new development. There are strategic and local transport connections, plus easy access to nearby local services and facilities in the village. It is considered for these reasons Chelmondiston should be allocated additional growth, given its strategic location in the district.
- 2.5 The Site is located within the Suffolk Coasts and Heaths Area of Outstanding Natural beauty (AONB), and any development would clearly need to be considerate of the impact on the wider countryside and characteristics of this designated valued landscape.
- 2.6 As greenfield land in agricultural use, there are no known physical constraints to the development of the Site.
 - Babergh and Mid Suffolk JLP Strategic Housing and Economic Land Availability Assessment (SHELAA)
- 2.7 The Site is included as part of the SHELAA 2019 (Ref SS1115), however it was discounted on the basis that 'large scale development is not suitable and is likely to have a detrimental impact on the ACMET. It therefore formed part of Appendix E discounted sites.
- 2.9 We do not agree with the reasons outlined in the SHELAA, and it is not clear why exactly the site was discounted as no detailed assessment of the site is provided. Whilst the site is located within the AONS, this also covers the vast mejority of the village and therefore the proposed development of the site would form a sensitive extension of the village through mainly infill development as the site is surrounded on three sides by existing development, rather than new development within the AONS.
 - Proposed Concept Masterplan
- 2.9 With appropriate masterplanning and design, the Site is capable of delivering a sensitively designed, but comprehensive and well-connected sustainable development that could contribute to the local development needs of Babergh District and Cheimondiston. A Proposed Concept Masterplan (Appendix One) has been prepared for the Site to demonstrate this, showing indicatively how the site could be brought forward to deliver

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around 60 homes, including affordable housing, together with new public open space and facilities for the community.

- 2.10 Through the allocation of the site for development, there would be a number of positive benefits for the Parish, and it would ensure that the Parish have more influence and certainly over the delivery of new development and what it looks like.
- 2.11 The proposals would provide a range of housing types and sizes to reflect local need and provide greater choice for local residents. The proposals would comprise 35% Affordable Housing, which could include discounted housing for owner occupation, such as 'Starter Homes' or 'First Homes' for first time buyers, shared ownership or affordable housing for rent. It is noted that paragraph 3.15 of the Chelpin Plan outlines that Chelmondiston has an older average age than the rest of Suffolk, and suitable dwelling types to meet the needs of older persons could be included within the proposals.
- 2.12 As illustrated on the Proposed Concept Masterplan, the proposals seek to provide ecological enhancements, new tree planting, new attenuation basin/SuDS, new public open space with areas for informal and formal recreation, and new pedestrian and cycle links.
- 2.13 Furthermore, through the delivery of a comprehensive development, achievable at land at Hill Farm Lane, significant contributions would be made to the Parish through obligations and the Community infrastructure Levy (CIL) and the PAMS payment.

Land Ownership and Deliverability

2.14 The Site is wholly in Vistry Group's control. This significantly de-risks the deliverability of the site as there are no third parties involved in the site promotion and its delay to come forward as a future planning application. This should be given considerable weight when considering the development need and delivery through the plan period.

Highways and Access

2.15 The Proposed Concept Masterplan indicates access from the Main Road. Suitable accesses to the site, and any required highway improvements, would be agreed with officers from Suffolk County Council Highways.

Flooding and Drainage

2.16 The site lies within Flood Zone 1 and there is no surface water flooding onsite. The proposals would include a new attenuation basin/SuDS within the site. Drainage and points of discharge for surface water drainage would be agreed as part of the detailed design stage with the LLFA.

Landscape and AONB

2.17 As set out above, the Site's location within the AONB is recognised and is a principle consideration of the emerging proposals. The Proposed Concept Masterpian is sensitive to the relationship the development would have to the wider landscape and seeks to ensure

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that landscape features maintain the Site's visual containment. This enhancement of existing vegetation will also look to increase biodiversity.

2.18 An area of open space is proposed to the north of the site that would contribute to a sense of place, provides connections with the public footpath to the north of the Site along Hollow Lane, and protects the setting of the nearby Listed Buildings. This area of informal recreational open space would be bound to the south by hedgerow planting to reinstate a historic field boundary.

Heritage

2.19 There are three Grade II listed buildings located to the north of the site. As set out above, the Proposed Concept Masterplan seeks to minimise the harm to the significant of the Listed Buildings with an open space buffer to the north of the site to protect the setting.

Community Benefits

- 2.20 The proposed development has the potential to provide a range of benefits to the local community, including:
 - 35% affordable housing = 21 affordable homes for rent or ownership;
 - A mix of homes for purchase, from bungalows to four-bedroom homes, in a range of types and styles;
 - All homes (including affordable housing) built to a very high quality, with high standards of energy efficiency, sympathetically designed in keeping with the local character, matching local styles and materials:
 - New public open spaces and recreation facilities for the local community to enjoy, including:
 - an attractive walking route through the connected green spaces within the scheme;
 - a new green village space, including seating areas;
 - a central green area for new residents, integrated into the scheme and overlooked by housing:
 - a naturalistic children's play area;
 - potential opportunity for a community garden;
 - a tree-lined green street running through the development, connecting the two new green spaces, providing an attractive walking and cycling route;
 - Habitat and wildlife corridors, tree and hedge planting, providing biodiversity enhancement opportunities;
 - Financial contributions to community infrastructure, which could include contributions to public transport improvements:
 - A new access from the B1456, which would slow approaching traffic from the east and could incorporate further traffic caiming measures if necessary.

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Proposed Mechanism for Delivery

Site Promotion

- 2.21 Further to previous engagement, Vistry Group welcome the Parish Council's consideration of the potential to bring this site forward for residential development as part of the Neighbourhood Plan.
- 2.22 This approach would allow for full consideration of the delivery of infrastructure, and housing in line with the needs of the local community.
- 2.23 This should also be seen as an opportunity to assist with planning growth for Babergh, Mid Suffolk and the wider Housing Market Area, which should be the intention of the current planning system.

Engagement

- 2.24 Vistry Group have sought to proactively engage with the Parish Council early in the promotion of the site and the evolution of development proposals. They are also keen to work cooperatively to inform the Parish Council of the emerging proposals, and to directly input to the emerging Neighbourhood Plan and the supporting documents.
- 2.25 Vistry Group are committed to continuing engagement with the Parish Council as well as Officers at Babergh District Council, and Suffolk County Council, as part of this Site's promotion, and any subsequent application.
- 2.26 As the proposals evolve further, engagement would also be had with key stakeholders, and the local community to obtain their feedback and inform the proposals for the site.

6. CONCLUSIONS

- 6.1 As has been explained through these representations, having undertaken a detailed review of the consultation document, whilst Vistry Group are supportive of the Neighbourhood Plan, it is considered that the current draft Chelpin Plan requires some amendments to ensure it is in conformity to national planning policy and guidance. As it is currently drafted it would fall to meet the necessary Basic Conditions of Paragraph 8(1)(a)(2) of Schedule 4B of the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).
- 6.2 Chelmondiston provides a sustainable location for new development and is capable of accommodating appropriate level of growth through the delivery of small and medium size sites, in order to provide for the identified housing need of the local community throughout the plan period. However, the proposed approach of the Chelpin Plan fails to plan for sufficient new growth over the plan period to meet even the minimum housing requirement. For this reason, the Chelpin Plan, as currently drafted, does not accord with provisions of the NPPF (2019) and would not contribute to the achievement of sustainable development, and does not therefore meet Basic Conditions a) or d).
- 6.3 It is considered that Cheimondiston could appropriately accommodate more growth from additional small and medium sites to meet the identified housing need, and it is proposed that land at Hill Farm, Cheimondiston presents an available, suitable and sustainable site that could sympathetically deliver around 60 homes, including affordable housing, within the mid to later years of the plan period. The scale of the proposed scheme means that it could provide a wealth of benefits to the local community, as summarised at paragraph 2.20, which other smaller scale developments would not be able to provide. It would therefore help to secure the investment and community infrastructure that the Neighbourhood Plan aims to achieve, as well as providing affordable homes locally.
- 6.4 Amendments and further refinement, in line with the suggestions and recommendations provided through these representations, should be made in order to progress the Chelpin Plan towards submission.
- 6.5 Vistry Group are keen to work cooperatively with the Parish Council in relation to the emerging proposals for Land at Hill Farm, Chelmondiston and are willing to provide further details to demonstrate the deliverability of the site. Through further engagement, Vistry Group would be pleased to inform and support the progression of the emerging Neighbourhood Plan for Chelmondiston.

APPENDIX ONE – PROPOSED CONCEPT MASTERPLAN



Chelmondiston Parish Council

December 2020