

Elmsett Neighbourhood Plan

Elmsett Parish Council's response to comments received at Regulation 16 Consultation stage. 4 April 2019

Body	Parish Council response
1) Babergh District Council	The Parish Council would support this modification in order to reflect the current situation regarding mitigation of potential disturbance in the SPA.
2) Natural England	Nothing further to add
3) Historic England	Nothing further to add
4) Environment Agency	The Parish Council considers that sufficient policy guidance is already contained in the Local Plan and NPPF to cover the Flood Risk matters raised. Further, it is not considered necessary to develop Policy EMST9 – Local Green Spaces given that the spaces already exist and are not new green space proposals.
Highways England	Nothing further to add.
6) Anglian Water	The Parish Council would support the additional wording concerning SuDS should the Examiner consider it necessary to ensure that the policy meets the Basic Conditions.
7) National Grid	Nothing further to add
8) Suffolk County Council	Given that paragraph 98 of the NPPF, as referred to by Suffolk CC, addresses the protection and enhancement of public rights of way, it is not considered necessary to repeat such a requirement in the neighbourhood plan. The comments concerning the primary school capacity are noted. The Neighbourhood Plan exceeds its housing requirement and no further allocations are required in the Neighbourhood Plan.

Body	Parish Council response
9) Strutt & Parker	<p>In relation to comments concerning Basic Condition d) (page 2 of the representation), the evidence base referred to was published for consultation as part of the August 2017 Joint Local Plan Options consultation. It was found to have a number of flaws concerning data including that for Elmsett, when all of the criteria were examined in detail using the District Councils own points system it clearly suggests that the village should be classified as a “hinterland village”. Given that the Core Village designation has no status in the adopted development plan and the early stage of the preparation of the Joint Local Plan, this argument does not have any weight in the preparation of the Neighbourhood Plan.</p> <p>The Plan identifies how it meets the currently identified housing requirement for the settlement in a sustainable way, in accordance with the adopted planning policies for the distribution of housing growth and likely requirements based upon the latest housing forecasts for Babergh to 2036. It is significantly higher than the current adopted planning policy requirement and the requirement that is calculated in paragraph 8.6 of the Plan (between 15 and 46 homes). Even if Elmsett were to be designated as a Core Village in the emerging Local Plan, the calculation based on the formula in para 8.6 would be between 23 and 54 homes. The Neighbourhood Plan makes provision for 60 homes and this does not include a recent permission for 18 homes that were granted consent in November 2018. The fact that these largely comprise existing planning consents demonstrates that these allocations are deliverable while it is not considered that, based on available evidence, further local demand for an additional market housing allocation is likely during the plan period.</p> <p>Under “Condition e)” the respondent refers to the 2006 Core Strategy. The Core Strategy is, in fact, dated 2014. It is also impossible for the Neighbourhood Plan to reflect the “likely emerging policies” as nobody knows what these are! The Joint Local Plan is unlikely to be adopted until the end of 2020, at the earliest, and therefore should there be a requirement to update the Neighbourhood Plan it can be undertaken at this time. Further, there is no evidence provided by Strutt & Parker to demonstrate that the requirement in the JLP could be “closer to 100”.</p> <p>Further, Babergh District Council can currently demonstrate a five-years supply of housing sites and there is no need to allocate a further site at Elmsett to address any shortfall.</p> <p>We conclude that the representations submitted by Strutt & Parker are not supported by evidence and that their proposed modifications are not required in order for the Plan to meet the Basic Conditions.</p>
10) Gladman Developments	<p>The Parish Council is well aware of the requirements of legislation and the NPPF in respect of preparing neighbourhood plans and are satisfied that the Neighbourhood Plan has been prepared within these requirements. We are also fully aware of the relationship with the current and emerging Local Plan.</p> <p>The Neighbourhood Plan has been prepared for the period to 2036 in order that it can provide a policy framework for the village in excess of 15 years (in accordance with Para 157 of the NPPF) and to reflect forecast housing growth levels for this period. To plan only to 2031 would reduce the housing requirement set out in paragraph 8.6 considerably, adding nothing to the Plan given that permissions already exceed the calculated need to 2036.</p>

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	<p>Specific comments follow:</p> <p>EMST1 - A fundamental plank of Policy CS11 is the need to demonstrate that the housing proposed meets an identified local need. Babergh District Council has recently refused a planning application for 42 homes because <i>“The application fails to adequately demonstrate how the proposal responds to a local identified housing need, contrary to policy CS11 (iv) of the Babergh Core Strategy and paragraph 77 of the NPPF which requires development in rural areas to be responsive to local circumstances and support housing developments that reflect local needs.”</i> (Application reference - DC_18_02316).</p> <p>EMST2 – The Neighbourhood Plan has taken a positive approach to the consideration of housing growth in the village. As identified in paragraph 8.3 of the Plan, had the Plan been prepared in accordance with the Core Strategy then there would not have been a need to identify any sites for housing as the Core Strategy requirement for Hinterland Villages has already been delivered.</p> <p>We also disagree with the suggested approach that commitments should not be deleted from the housing requirement. If all the commitments across Babergh were deleted from the housing requirement, as at 1 April 2018 there would be an oversupply need for an additional 4,377 dwellings. The suggested approach is not supported through the preparation of local plans and is therefore not appropriate for a neighbourhood plan!</p> <p>The comments in their paragraph at the top of page 4 have been addressed in our response to Strutt & Parker. Gladman have also suggested that the Plan makes provision for “60 dwellings per year” which is clearly wrong.</p> <p>EMST6 – Evidence collected during the preparation of the Plan, including the household survey, demonstrated a strong need for homes for residents to downsize. Typically, such homes require larger rooms to meet such needs.</p> <p>EMST7 – It is acknowledged that the SHMA is only “a snapshot in time” but it does provide a forecast of needs over the Plan period and, in the absence of anything else, is the most reliable data upon which to base a planning policy.</p> <p>EMST10 – The important views have been identified using Landscape Institute criteria and the evidence is set out in the Important Views Assessment – October 2018 available on the Parish Council website.</p> <p>Community Action 4 – While the comments concerning the Village Hall are noted, the community action does not constitute a planning policy and therefore does not need to satisfy the basic conditions. Consideration of the provision of a new village hall has commenced and such a building is almost certain to be located on the existing site.</p>