

## Great Barton Neighbourhood Plan - Response to Examiner's Clarification Note

Great Barton Parish Council approved the content of this response to the Neighbourhood Plan Examiner's Clarification Note at its meeting on 21 September 2020. The response should be read in conjunction with the Clarification Note issued on 1 September 2020

### **Policy GB3**

**Does the imposition of development of 'around 150 dwellings' have regard to national policy to (NPPF paragraphs 59/60)?**

#### **Response:**

For the avoidance of doubt, it is Policy GB2 that sets out "around 150 dwellings" would be developed in the village, not including the Severals Strategic Site but taking account of the content of Policy GB3. Policy GB2 makes provision is made for a limited number of additional dwellings across the parish that would be in accordance with the locational criteria of Policy GB2.

Policy GB3 sets a requirement for up to 150 dwellings as it has taken "local circumstances into account, to reflect the character, needs and opportunities of each area" as required by Paragraph 9 of the Framework. In addition, and in accordance with Policy CS4 of the Core Strategy, the number of dwellings has been set so that the development meets the requirements of Policy RV18 of Rural Vision 2031 and will "not detract from the environmental quality, townscape, functional vitality and setting of the settlement as a whole" (Policy CS4).

The housing need for Great Barton has been assessed by AECOM in the Housing Needs Assessment (April 2019) which forms part of the evidence for the Neighbourhood Plan. The Assessment states: "The combined two sites allocated to Great Barton in the Local Plan generate a de facto Housing Needs Figure (HNF) for Great Barton of 1,290 dwellings. While the capacity of these sites has however not been confirmed, it is not worth generating an alternative HNF for Great Barton given that such a figure would not take full account of the major strategic site, and fall significantly beneath the 1,290 number.

Therefore, the figure of around 150 dwellings in Policy GB2 and the subsequent specification of typologies:

- 1 - meets the "needs of groups with specific housing requirements" (Para 59 of the NPPF).
- 2 - is "informed by a local housing need assessment" (Para 60 of the NPPF).

It also has regard to Paragraph 9 of the Framework in that it demonstrates that the development has taken "local circumstances into account, to reflect the character, needs and opportunities of each area."

### **Policy GB3**

**Is the figure of 150 dwellings intended to be a cap or simply an indicative figure?**

It is intended that the figure of 150 is a cap and is based on the character, environment, design and infrastructure constraints and requirements for the site and its surroundings. This is reinforced by the new requirement from the County Education Department, as identified at the Submission Consultation stage, for additional land to be set aside for the potential expansion of the Primary School. This is to be in addition to the adopted Local Plan Policy requirement for community uses, enhanced footpath and cycleway access and areas of public open space. The figure also has regard to Policy CS4 of the Core Strategy and Paragraph 9 of the Framework, as referred to above.

In considering this policy and how the site could be developed, regard has been given to the outcomes of the various stages of community engagement as noted in the Consultation Statement.

**Policy GB4**

**Is the proposed housing mix underpinned by appropriate evidence?**

It is considered that the evidence is appropriate for what is required to support a Neighbourhood Plan and demonstrate that it meets the Basic Conditions. The AECOM Housing Needs Assessment (April 2019), referred to in paragraph 6.26 of the Neighbourhood Plan, demonstrates the need for the mix of dwellings set out in Policy GB4. The Parish Council is not aware of any other up-to-date information on this matter having been published by West Suffolk Council.

The Neighbourhood Plan Household Questionnaire also identified a demand for bungalows.

Great Barton is an almost unique village where bungalows make a significant contribution to its character and environment. The map attached to this response illustrates the propensity of bungalows in the village centre.

**Policy GB4**

**Is the intended 15% delivery of bungalows intended to overlap with the requirement for 60% of all dwellings to be two or three bedrooms in size?**

It is intended that 60% of all the dwellings would be two or three bedrooms in size. Further, 15% of all the dwellings on the site would be bungalows, regardless of number of bedrooms or tenure.

**Policy GB5**

**Is it the Parish Council's intention that the whole of the policy would apply to The Severals site with the exception of section ii (the two-storey height issue)?**

It is considered that all elements of the Policy are appropriate to The Severals site.

Early engagement with Berkeley Strategic, the initial developers and promoters of the Severals Strategic Site, indicated that they were content for their site to be included in the Neighbourhood Plan Area and, as such, that its policies might apply to that area as appropriate. St Joseph Homes, part of the Berkeley Group, submitted a hybrid planning application for the strategic site in December 2019. They submitted comments at the Regulation 14 consultation stage but have not submitted comments during the submission consultation.

The Policy takes its direction from the content of the AECOM Design Guidelines (January 2020) which has given careful consideration to the character and form of development in the Parish, as required by Policy CS4 of the Core Strategy. It is therefore appropriate that the content of Policy GB5 should apply to the Severals site but, as explained below, the Policy as submitted does provide exceptions.

Part i of the Policy is entirely appropriate to the consideration of development on the Severals site. Part ii of the Policy excludes the Severals site, acknowledging that the adopted masterplan makes provision for dwellings in excess of two storeys.

Part iii of the Policy states "where appropriate" dwellings should have a minimum back-to-back distance of 40 metres. The developers of the site may not consider that such a requirement is

appropriate on the Severals site and this should be demonstrated at the time of the planning application or subsequent “reserved matters” submission.

The household questionnaire, referred to in the Plan and on the Neighbourhood Plan pages of the Parish Council website, identified that 89% of respondents considered that the Neighbourhood Plan should include specific garden sizes and minimum separation distances to maintain current housing densities as typifies Great Barton.

It is also considered essential that the Government Technical Standards for minimum floorspaces should also be retained and apply to The Severals. The Standards are adopted as “Technical Guidance” by West Suffolk Council (link below) and paragraph 8.4 of that document states that “It is the intention of West Suffolk Council to include a policy requirement for all new homes to be built to the national space standards in the next version of their Local Plan.”.

[https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/171205-Space-Standards-at-Dec-2017-for-West-Suffolk-FINAL-clean-version.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/171205-Space-Standards-at-Dec-2017-for-West-Suffolk-FINAL-clean-version.pdf)

**Policy GB9**

**The Local Green Space Assessment is well-developed and is presented in an attractive way. However, is the final sentence of the submitted policy supporting text rather than policy?**

This is a policy approach that has been successfully examined in other neighbourhood plans including the Hargrave Neighbourhood Plan, also in West Suffolk. Its inclusion provides a level of consistency of policies for practitioners.

**Policy GB14**

**The Buildings of Local Significance study is well-developed and is presented in an attractive way.**

Noted.

**Parish Council’s response to the Regulation 16 representations received by West Suffolk Council.**

The table below provides a response from the Parish Council to all comments received at the Regulation 16 Submission Consultation Stage.

<b>Body/Individual</b>	<b>Parish Council response</b>
Anglian Water	<p>Policy GB1: The Parish Council has nothing further to add to its comments in response to the Pre-Submission Consultation representation.</p> <p>Policy GB13 – Nothing further to add.</p>
Baker	<p>The respondent did not comment at the Regulation 14 consultation stage.</p> <p>Highways England have responded to the consultation, and explain that the situation and limitations concerning the A143 are a matter which the local highway authority may wish to consider outside of the Plan. They state that they would be happy to be involved in any future discussions regarding strategic traffic movements along the A143 especially where this has any bearing on the strategic road network.</p>
Broughton	<p>The respondent did not comment at the Regulation 14 consultation stage although his wife, Councillor Mrs S Broughton (the West Suffolk Ward Councillor for the Neighbourhood Plan Area), did make comments.</p> <p><b>Policy GB6</b> – The Neighbourhood Plan seeks to protect existing employment opportunities in the village from being lost to ensure a balanced and sustainable community, as noted in one of the Plan’s Objectives. The adopted Local Plan Development Management Policies, in particular Policy DM30, would apply for any non-employment use proposed to employment premises referred to. The Neighbourhood Plan adds value to Policy DM30 by identifying local employment sites and refers to proposals for the loss of employment floorspace being considered against the policies of the Local Plan. We recognise that the Examiner will determine whether the policy is contrary to Government Guidelines.</p> <p><b>Policy GB14</b> - The Neighbourhood Plan has met the requirements of the Neighbourhood Planning Regulations in terms of engagement as is noted in the Consultation Statement. The ownership of individual properties is not in the public domain and so the Parish Council does not know whether the occupier rents or owns their property.</p> <p>With regard to Anglenook Cottages, which were being considered for inclusion in the Buildings of Local Significance, letters were addressed to the Owner/Occupier on 20 June 2019 and again on 16 December 2019.</p> <p>At a Drop-in event held to commence the pre-submission consultation of the draft Neighbourhood Plan we were advised by his wife, Councillor Mrs S Broughton that Anglenook Cottages were rented and that she</p>

Body/Individual	Parish Council response
	<p>owned the cottages. At her request the Neighbourhood Plan Clerk posted her the relevant documents via Royal Mail on Monday 20 January, two days after the pre-submission consultation commenced. The Parish Council is therefore satisfied that the owner was aware of the proposed identification of Anglenook Cottages as Buildings of Local Significance and was able to comment on their inclusion during the statutory consultation stages.</p> <p>The comments from Councillor Mrs S Broughton relating to the inclusion of Anglenook Cottages in Policy GB14 are set out on page 114 of the Consultation Statement.</p> <p><b>Engagement with the Neighbourhood Plan</b> - The Neighbourhood Plan Working Group (NPWG) was set up in 2016. It comprises a group of volunteers who offered to help the Parish Council develop the Neighbourhood Plan. The NPWG usually meets once a month in the Village Hall and the dates of all the meetings are published in advance on the Neighbourhood Plan section of the Parish Council website. The agenda is sent out to members of the NPWG a week ahead of each meeting. At the same time, it is put onto the Neighbourhood Plan website and a copy sent to the Parish Council Clerk for her to put on the Parish Council Notice Boards. The NPWG has always encouraged the residents of Great Barton who are interested in the Great Barton Neighbourhood Plan to join the meetings and help to develop the plan.</p> <p>The Action Points from each NPWG meeting are agreed at the following meeting and are put on the Neighbourhood Plan Noticeboard in the Village Hall that same day. They are then put on the Neighbourhood Plan website as soon as possible. Dates of future meetings are noted on the Cation Points.</p> <p>In addition, as the Qualifying Body the Parish Council has been given an update on the progress of the Neighbourhood Plan at each monthly Parish Council meeting and decisions on the Neighbourhood Plan are taken by the Parish Council at their meeting as and when appropriate. The Parish Council has included an update on the Neighbourhood Plan in its quarterly newsletter delivered to all homes in the Parish. Invitations for the Drop-in and Household Questionnaires have also been delivered to all homes.</p> <p>The Neighbourhood Plan website has been kept up to date throughout the past four years. The email address for the Neighbourhood Plan Clerk has been available throughout that period along with the name, address and telephone number of the Parish Clerk if anyone has wanted further information or has wanted to assist with the development of the Neighbourhood Plan.</p> <p>There have been many opportunities for residents to engage with the Parish Council and the NPWG on the Neighbourhood Plan and many have done so.</p>

<b>Body/Individual</b>	<b>Parish Council response</b>
Browning	<p>The respondent did not comment at the Regulation 14 consultation stage.</p> <p>The purpose of Local Green Spaces is explained in the Plan and it means that those areas cannot be built on except in exceptional circumstances.</p> <p>The extent of the proposed Local Green Spaces at Maple Green is identified on the Policies Map and it does not include any of the houses or their gardens on Maple Green. This Local Green Spaces Assessment provides a more detailed map to show the extent of the green space that would be protected.</p>
Hale	<p>The respondent did not comment at the Regulation 14 consultation stage.</p> <p>The comments are noted. Map 10 illustrates areas where residents highlighted concerns. Speeding on Thurston Road is not a matter that was highlighted by residents during the various community engagement exercises undertaken in the preparation of the NP.</p>
Highways England	<p>Highways England did not respond to the consultation at the Regulation 14 stage.</p> <p>The comments do not raise any objections to the Plan and the Parish Council does not wish to make comment.</p>
Montagu Evans on behalf of West Suffolk Council and Suffolk County Council	<p>The representation takes the form of a 9-page letter representing the local authorities as landowner and prospective developer. The Parish Council response is made on a page by page basis.</p> <p>Page 1 – Nothing further to add.</p> <p>Page 2 – Nothing further to add.</p> <p>Page 3 – Housing Capacity. Paragraph 6.5 of the Neighbourhood Plan acknowledges the point repeated by Montagu Evans about taking account of the Planning Practice Guidance.</p> <p><b>General Response</b></p> <p>The preparation of the Neighbourhood Plan has enabled the early and positive planning for how the whole of the site covered by Policy RV18 of the Rural Vision 2031 document could be developed. Without this, the adopted Local Plan policy would only allow “up to 40 dwellings to be permitted by 2031”. The Neighbourhood Plan, as written, enables up to 150 dwellings on the site without a time constraint on when this would be permitted.</p> <p><b>Housing Capacity</b></p> <p>Page 4: First bullet point – Reference is made to Policy RV18 of the Rural Vision 2031 Document and Great Barton’s designation as a “Local Services Centre” suggesting that the village should be a “focus for new housing growth”. However, the letter fails to acknowledge the hierarchy</p>

Body/Individual	Parish Council response
	<p>of settlements set out in the adopted St Edmundsbury Core Strategy, from which the Rural Vision document takes its direction. Outside the main towns of Bury St Edmunds and Haverhill, the Core Strategy designates Key Service Centres, Local Service Centres and Other Villages.</p> <p>In Rural Vision 2031, a table on page 29 identifies the site allocations for each Key Service Centre and Local Service Centre through to 2031. In accordance with the Core Strategy, most development is planned for the Key Service Centres (78% of the housing allocation) and in the Local Service Centres, such as Great Barton, only 22% of the growth in the rural area was planned.</p> <p>The level of development planned in Policy GB3 is commensurate with the adopted Core Strategy and Rural Vision 2031. The policy also supports the efficient use of the land and has regard to Policy CS4 of the Core Strategy which states that "Careful consideration will be given to maintaining the identity, character and historical context of settlements, to ensure new development does not detract from the environmental quality, townscape, functional vitality and setting of the settlement as a whole." Clearly this does not require maximising the development potential of a site regardless of all other considerations.</p> <p>Page 4: Second bullet point – Paragraph 6.12 of the Neighbourhood Plan acknowledges that what is contained in the Plan "does not constitute the Development Brief required by the Rural Vision 2031 policy, but it does provide guidance on how the site could be developed in order that a more detailed Development Brief can be prepared, should West Suffolk Council deem it necessary." The content of the Neighbourhood Plan represents a considered approach having regard to "the identity, character and historical context of settlements, to ensure new development does not detract from the environmental quality, townscape, functional vitality and setting of the settlement as a whole" as specified in Core Strategy Policy CS4. This is also in accordance with Paragraph 9 of the Framework, overlooked by Montagu Evans, which states that "Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area."</p> <p>Page 4: Third bullet point – Paragraph 6.17 explains how the dwelling capacity of the site has been arrived at, demonstrating that development has taken "local circumstances into account, to reflect the character, needs and opportunities of each area" as required by Paragraph 9 of the Framework and, in accordance with Policy CS4 of the Core Strategy, will "not detract from the environmental quality, townscape, functional vitality and setting of the settlement as a whole".</p> <p>As such, Policy GB3 does have regard to national policy and is in conformity with the strategic policies of the adopted Development Plan.</p>

Body/Individual	Parish Council response
	<p><b>Housing Type and Mix</b>  Pages 4 &amp; 5: The representation continues to rely on the singular requirement of the Framework to make efficient use of land.</p> <p>Policies GB3, GB4 and GB5 are in accordance with the adopted Development Plan policies and supported by new and up-to-date evidence. While it is acknowledged that a new Local Plan for West Suffolk is in preparation, we are where we are with that timetable and evidence in support of the Local Plan has yet to be published. Even if it had, it is considered unlikely to provide settlement-by-settlement detail that the Neighbourhood Plan evidence provides. The AECOM Housing Needs Assessment, referred to in paragraph 6.26 of the Neighbourhood Plan, accords with the Framework requirements in relation to meeting “objectively assessed needs”.</p> <p>The inclusion of the requirement for 30% affordable housing in Policy GB3 is considered appropriate as it provides certainty for all involved in the development of the site.</p> <p><b>Housing Design</b>  Page 5: It is important to emphasise that Policy GB5 iii states “where appropriate” dwellings should have a minimum back-to-back separation of 40 metres. If developers’ consider that such a requirement is not appropriate then they should set out the reasons for this at the planning application stage or “reserved matters” submission.</p> <p><b>Vehicular and Pedestrian Access</b>  Pages 5&amp;6: The Parish Council has previously addressed this comment at the Pre-Submission Consultation stage. To re-iterate, it is considered that a second access would be likely to have a significant detrimental impact on the rural character of the village. It is also considered that the development costs would increase significantly if a second, unnecessary, access were required. The County Council, as highways authority, has not objected to a single access as proposed in Policy GB3.</p> <p><b>Montagu Evans requested modifications to Policy Wording</b>  Just as, in the view of Montagu Evans, setting a limit of 150 dwellings is, in their opinion, too rigid, so would setting a requirement of “at least 150 dwellings” for the site. If, taking other factors and policy requirements into account, it was concluded that the site couldn’t deliver 150 dwellings then the development would not be in accordance with policy and should be refused. The Policy as contained in the Neighbourhood Plan provides a positive approach to determining the nature and quantum of development of the site in accordance with the Framework, Policy CS4 of the adopted Core Strategy and Policy RV18 of Rural Vision 2031.</p> <p>Further, the Parish Council does not support the remaining requested modifications to policies proposed by Montagu Evans.</p>
Avison Young obo National Grid	The response is a repeat of that submitted at the Regulation 14 stage. The Parish Council has nothing further to add.

Body/Individual	Parish Council response
Natural England	<p>Natural England did not respond to the consultation at the Regulation 14 stage.</p> <p>The comments do not raise any objections to the Plan and the Parish Council does not wish to make comments.</p>
NHS West Suffolk CCG	<p>Paragraph 3.11 – This is a factual statement as the Severals Masterplan has been approved by West Suffolk Council, who are currently considering a planning application for the site. The matters relating to the possible provision of health facilities on the site is a matter for the CCG to take up with West Suffolk Council.</p> <p>Paragraph 8.7 – The Parish Council has nothing further to add.</p>
Sheppard	<p>The respondent did not comment at the Regulation 14 consultation stage.</p> <p>The comments do not raise any objections to the Plan and the Parish Council does not wish to make comment.</p>
Sport England	<p>The response is a repeat of that submitted at the Regulation 14 stage. The Parish Council has nothing further to add.</p>
Suffolk County Council	<p><u>Education</u> – The updated capacity information data for the Primary School is noted. It is for the Examiner to determine whether the updated information is relevant and material to the Plan and whether modifications are required to meet the Basic Conditions.</p> <p>The new requirement for a larger area of land to be safeguarded for the possible expansion of the Primary School is noted. This requirement was not raised at the pre-submission stage. The Parish Council is happy to support the amendment but would not wish to see the Policy GB3 requirement for community facilities to be diminished. Such an amendment should result in a decrease on the developable area for residential uses and reinforces the stance that the Neighbourhood Plan takes in terms of the housing capacity of the site. It is assumed that this would result in a lesser area suitable for housing development and reinforces the argument for why the maximum amount of 150 is appropriate.</p> <p>It is further assumed that the additional land required for education is deliverable as it would be transferred by the County Council as landowner to the School.</p> <p><u>Health and Wellbeing</u> – The Parish Council remains of the opinion that Neighbourhood Plans should not be setting additional technical standards due to the Ministerial Statement. However, the Examiner may consider that such an amendment can be made.</p> <p><u>Transport</u> – It is considered that the proposed amendment to Policy GB12 part 17 would result in a vague policy that would be open to</p>

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	<p>interpretation and would not result in a consistent and coherent approach across the parish.</p> <p><u>General</u> – The General comments concerning maps are errors that can be addressed at the post-examination stage without the Examiner requiring the modifications to ensure that the Plan meets the Basic Conditions.</p>
Suffolk Fire and Rescue	<p>The suggested requirement for sprinkler systems and access in new development is a matter for the Building Regulations and not something that can be addressed in planning policies.</p>
Thorneley	<p>The respondent did not comment at the Regulation 14 consultation stage.</p> <p>Figure 12, the Concept Diagram, and the site Development Principles (page 34) identify that a single vehicular access to the site should be from Mill Road, which is in accordance with the adopted Local Plan (Rural Vision 2031 Policy RV18 refers) but that footpath and cycleway connections through the site should provide links between School Road, Mill Road and the A143. These are illustrated on Figure 12.</p>
West Suffolk Council – Planning Policy	<p>Page 1 of West Suffolk Council letter – The Parish Council has nothing further to add.</p> <p>Page 2 – It is not clear what the purpose of the inclusion of Annex A to the letter serves, but the Parish Council has nothing further to add to Annex A.</p> <p>Reference is made to the suggestion of a meeting. Meetings have been held with the local planning authority on several occasions during the preparation of the Plan. A draft of the Neighbourhood Plan was sent to West Suffolk Planning Policy Officers in December 2019, ahead of the Pre-Submission Consultation. The Planning Officers did not identify any “showstoppers” in the Plan and their comments were primarily focused on matters of detail.</p> <p>The Parish Council believes that appropriate amendments to the Neighbourhood Plan have been made following the receipt of the comments from West Suffolk Council. It was not considered necessary to meet with Planning Policy Officers following the consultation given the clarity of their comments and desires of the Parish council in terms of the content and coverage of the Plan. It is acknowledged that there remain matters where the Parish Council and West Suffolk Council have a difference of opinion, but the Parish Council is content for the Examiner to assess whether the Neighbourhood Plan policies meet the Basic Conditions or whether the Plan needs to be amended to ensure that the Plan meets the Basic Conditions..</p> <p><b>Pages 2 to 5 – West Suffolk Council matter a)</b>  Policy GB5 - The Parish Council notes that The Severals strategic site is expected to be developed over a number of years. It is therefore</p>

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	<p>important that appropriate policies are in place to deliver a high quality living environment as and when future planning applications for the development are considered. The comment states that the Severals site is an “urban extension allocation to Bury St Edmunds”. However, the Vision in the adopted masterplan for the site, adopted by the former St Edmundsbury Borough Council on 30 June 2014, is “to deliver a new community with a village character”.</p> <p>As the Parish Council has stated above, Policy GB5 iii states “where appropriate” dwellings should have a minimum back-to-back separation of 40 metres. If developers’ consider that such a requirement is not appropriate then it will be for them, at the time of submitting planning applications, to demonstrate satisfactorily to the local planning authority why the minimum separation distance should not be applied to their development.</p> <p>Policy GB12 – It is important to understand the content of the Policy as a whole and, as such, the introduction to the 17 criteria in Policy GB12 states that “as appropriate to the proposal:” In respect to reflecting local garden size characteristics, it is recognised that, at present, there are no local garden sizes but, as future detailed applications on the Severals Strategic Site come forward it is essential that the emerging character of the area is maintained and that garden sizes reflect the overall character of that area.</p> <p><b>Pages 5 to 6 – West Suffolk Council matter b)</b>  Paragraph 6.12 of the Neighbourhood Plan acknowledges that the approach “does not constitute the Development Brief required by the Rural Vision 2031 policy, but it does provide guidance on how the site could be developed in order that a more detailed Development Brief can be prepared, should West Suffolk Council deem it necessary.”</p> <p>The preparation of the Neighbourhood Plan has enabled the early and positive planning for how the whole of the site covered by Policy RV18 of the Rural Vision 2031 document could be developed. Without this, the adopted Local Plan policy would only allow “up to 40 dwellings to be permitted by 2031”. The Neighbourhood Plan, as written, enables up to 150 dwellings on the site without a time constraint on when this would be permitted.</p> <p>Given the content of paragraphs 6.10 to 6.21 of the Neighbourhood Plan, as well as the supporting “Neighbourhood Plan Design Guidelines” the Parish Council questions what additional information could be addressed in a development brief that, having regard to “environmental quality, townscape, functional vitality and setting of the settlement as a whole” (Core Strategy Policy CS4) would provide a different result? The representation asks “whether a policy amendment to GB3 is required so that the maximum capacity for the whole site is determined through the production of a site development brief.” However, the Council has not specified what additional work over and above that already undertaken</p>

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	<p>would be required to meet the adopted policy requirements or the Council's <a href="#">Development Brief Protocol</a>.</p> <p>The Parish Council considers that the work it has undertaken has maximised the capacity of the site. The capacity identified in Policy GB3 consistent with Paragraph 9 of the Framework, which states that "Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area."</p> <p>The following development briefs in West Suffolk have used similar approaches to that in the Neighbourhood Plan to inform how the sites could be developed:</p> <p><a href="#">Barrow - land east of Barrow Hill</a>  <a href="#">Clare - land at Cavendish Road</a>  <a href="#">Haverhill - Castle Hill (former Castle Hill Middle School)</a>  <a href="#">Wickhambrook - The Meadows, (land at Nunnery Green and Cemetery Road)</a></p> <p>Ultimately, the site is currently allocated for 40 dwellings in the period to 2031 (Policy RV18). The Neighbourhood Plan has taken a positive approach to the development of the Triangle site as a whole and accepts the potential development of all of the site by 2036. Without the Neighbourhood Plan, development above 40 dwellings would be contrary to the adopted Local Plan and would have to be informed by the new Local Plan. Notwithstanding the potential impact of the changes to the Local Plan process proposed in the Planning White Paper (August 2020), the West Suffolk Local Development Scheme (June 2020) does not envisage that the new Local Plan Inspector's Report would be received until May 2024.</p> <p><b>Pages 6 to 7 – West Suffolk Council matter c)</b></p> <p>While the Council has suggested that Policy GB4 would not result in the "efficient use of land", the suggestion overlooks the requirements of Core Strategy Policy CS4 which states that "careful consideration will be given to maintaining the identity, character and historical context of settlements, to ensure new development does not detract from the environmental quality, townscape, functional vitality and setting of the settlement as a whole." This is precisely the approach undertaken in considering the development of the site allocated in Policy GB3.</p> <p>Great Barton is an almost unique village where bungalows make a significant contribution to its character and environment. The map attached to this response illustrates the propensity of bungalows in the village centre.</p> <p>It is not considered that the requirement for 15% of the properties to be bungalows, when having regard to the need for two and three bedroomed properties - and the 30% affordable housing (regardless of size and type) would have a negative impact on the viability and</p>

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	deliverability of the site, given that it is a greenfield site with no other constraints to its development.
Strategic Housing: West Suffolk Council	<p>The respondent did not comment at the Regulation 14 consultation stage.</p> <p>The support for 15% of dwellings to be built as bungalows is acknowledged albeit that it that it does not reflect the views of West Suffolk's Planning Policy comments.</p> <p>The support for the Concept Plan and, inter-alia, Policy GB3 is also acknowledged and again does not reflect the views of West Suffolk's Planning Policy comments.</p>
Historic England	The Parish Council has nothing further to add.

## Bungalows in village centre

The map below illustrates which properties in the Village centre are known to be bungalows and does not include 1½ storey properties. It based on observation using Google Maps Streetview and local observation from the public highway and therefore represents the minimum situation.

