

Dear Andrew

Thank you very much for your note seeking clarifications. We appreciate your thoughts that the plan is clear and concise and contains good information and good supporting material. Your suggestions for clarifications are also welcome and helpful. We appreciate the care and attention you have given to this process.

We provide these below the sections you have written, written in bold text. We hope this is a clear way to address them, but if you prefer a different approach, please do let us know.

With best regards

Philip Stiles and Julia Korona, Withersfield Parish Council

Withersfield Parish Neighbourhood Development Plan

Examiner's Clarification Note

This Note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of any doubt, matters of clarification are entirely normal at this early stage of the examination process.

Initial Comments

The Plan provides a clear and concise vision for the neighbourhood area.

The presentation of the Plan is good. The difference between the policies and the supporting text is very clear. In addition, the Plan makes good use of various high-quality maps, photographs, and other related information.

Points for Clarification

I have read the submitted documents and the representations made to the Plan. I have also visited the neighbourhood area. I am now able to raise issues for clarification with the Parish Council.

The comments made on the points in this Note will be used to assist in the preparation of the examination report and in recommending any modifications that may be necessary to the Plan to ensure that it meets the basic conditions. I set out specific policy clarification points below in the order in which they appear in the submitted Plan:

Policy WITH1

In principle the policy provides a good spatial strategy for the neighbourhood area and properly seeks to focus new development within the Housing Settlement Boundary.

However as submitted the use of the word 'may' brings an element of uncertainty to the policy's approach. Should 'may' read 'will' given the inbuilt safeguards in the policy?

This change has been made.

Policy WITH3

This is another good policy. The proposed designation of the Local Green Spaces (LGSs) is underpinned by the details in Appendix A.

In part C of the policy is the final sentence intended to apply generally or only to development proposals within the proposed LGSs?

Yes, it is intended to apply generally.

Policy WITH4

I looked carefully at the proposed Landscape Buffer during the visit. I saw its relationship to the northern edge of Haverhill.

I note that the supporting text identifies that the approach taken is a spatial policy rather than one which relates to landscape character. As such is the title of 'Landscape Buffer' appropriate and/or correct?

I note that the supporting text refers to former development plan documents rather than to the recently adopted Local Plan. In this context, does the policy have regard to strategic policies in the current development plan?

Furthermore:

- what has caused the Parish Council to want to define a precise area for the proposed landscape buffer (paragraph 4.18)?
- given the distance between the northern edge of Haverhill and Withersfield, and the policies in the adopted development plan, is there any realistic risk of coalescence taking place between the two settlements?
- could the objectives of the policy be achieved without spatially defining a buffer?

Thank you for these observations.

We have decided to keep the term “landscape buffer” because the town of Haverhill is fast-growing and numerous housing schemes have been developed on the eastern parts of the town. This is why, in response to bullet point 1, the Parish Council want to define a precise area for the landscape buffer. There were recent proposals to build on the land between Haverhill and Withersfield that would have seen significant infill and would have represented an erosion of the boundary between the two places. Relatedly, a proposal to build an anaerobic digester plant with a very large industrial footprint on Spring Grove Farm represents a major threat to the village in terms of its character, identity, and its health. So in response to bullet point 2, there is certainly a realistic risk of coalescence between the two settlements.

On bullet point 3. The spatial definition of a buffer is essential to maintain a strict boundary between the two settlements. Without a firm definition then there will be the possibility of a “stealth” infill, with developments making inroads into the boundary between the two settlements. The spatial definition follows natural boundaries and provides a clear and appropriate demarcation between Withersfield and Haverhill.

The text in the draft document refers to previous policies. In the revised version we will update this to include the West Suffolk Local Plan (2025). In particular Strategy Policy 21 Housing in the Countryside:

Policy SP21 Housing in the countryside.

“Permission will not be granted where a proposal harms or undermines a visually important gap that contributes to the character and distinctiveness of the rural scene, results in an unacceptable level of harm to the amenity of neighbouring properties, or where development would have an adverse impact on the environment or highway safety. Development should not contribute towards coalescence with adjacent settlements or contribute towards the development of isolated homes in the countryside in a piecemeal manner on sites next to other dispersed rural housing in the countryside. ”

Policy WITH5

In general terms the policy takes a positive approach towards safeguarding dark skies.

I am minded to recommend that the second bullet point is repositioned into the supporting text as the Institute of Lighting Professionals guidance is not directly a development plan (or land use) policy. Does the Parish Council have any comments on this proposition?

The second bullet has been moved into the main body of the text.

Representations

Does the Parish Council wish to comment on any of the representations made to the Plan? I would find it helpful if the Parish Council commented on the representations from:

- Jaynic Limited.
- Pigeon (and the landowners); and
- Suffolk Council (the two separate representations).

Thank you. We will comment on the representations from Jaynic, Pigeon, and Suffolk Council. Our responses would be:

Jaynic Limited.

Jaynic note that.

“Paragraph 1.3 references the emerging West Suffolk Local Plan. In July, the West Suffolk Local Plan was adopted and therefore should be updated to reflect what now constitutes the ‘development plan’ for the area. In addition, Plan A: Designated Withersfield Neighbourhood Area is an old OS Map base, and this should be updated to reflect the location of the Epicentre which is omitted at present.”

We will change both and also update the textual comments as suggested.

Pigeon (and the landowners)

The major point of Pigeon’s representation is to query policy WITH4 relating to the landscape buffer. Their intention is to build a housing development at Hales Barn Road, which falls within the parish of Withersfield. They question whether the growth of Haverhill should be restricted in this manner. We fundamentally disagree. The wording of the Neighbourhood Plan on WITH4 makes this plain and has particular reference to Hales Barn Road.

“The policy now translates the indicative buffer into a precise land area for the first time. No formal landscape assessment has been necessary to inform the extent of the buffer, as, like the Green Belt, this is a spatial policy, not one that accounts for landscape character. Simply, the Policy Map defines the minimum area of land the Parish Council considers is necessary to prevent development proposals that might otherwise be consistent with a countryside location causing the visual coalescence of the village with Haverhill from public vantage points in the village and town. Those points comprise highways, public open spaces, and public footpaths, notably Hales Barn Road and Three Counties Way in Haverhill and the public footpath running south from the village east of Hall Farm. The area boundaries follow clear physical features in the landscape – woodland and mature hedges – that act to contain the gap and, in the north, the boundary of the designated Withersfield Conservation Area. “

We accept, as Pigeon claim, that the Neighbourhood Plan did not have a specific response to Pigeon’s initial representation and we will add this to the revised version.

West Suffolk County Council

We have addressed all of WSC’s points within the text. We will also state this in a response to their representation.

Suffolk County Council

We have added the paragraph SCC have suggested concerning historic and archaeological sites into Section 4.10/

West Suffolk Council suggests a series of refinements to paragraphs 3.8 and 3.9 of the Plan. The Parish Council’s comments on these suggestions would be helpful.

These have all been accepted and the text has been altered accordingly.

Protocol for responses

I would be grateful for responses and the information requested by 24 November 2025. Please let me know if this timetable may be challenging to achieve. It is intended to maintain the momentum of the examination.

If certain responses are available before others, I would be happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled, please could it come to me directly from West Suffolk Council. In addition, please can all responses make direct reference to the policy concerned.

Andrew Ashcroft

Independent Examiner

Withersfield Parish Neighbourhood Development Plan

3 November 2025

