

Withersfield Parish Neighbourhood Development Plan 2021-2040

**A report to West Suffolk Council on the Withersfield
Parish Neighbourhood Development Plan**

**Andrew Ashcroft
Independent Examiner
BA (Hons) MA, DMS, MRTPI**

Director – Andrew Ashcroft Planning Limited

Executive Summary

- 1 I was appointed by West Suffolk Council in October 2025 to carry out the independent examination of the Withersfield Parish Neighbourhood Plan.
- 2 The examination was undertaken by written representations. I visited the neighbourhood area on 31 October 2025.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It proposes a Landscape Buffer between Withersfield and Haverhill, and includes policies on local green spaces, design, and the natural environment.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
23 January 2026

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Withersfield Parish Neighbourhood Development Plan 2021-2040 ('the Plan').
- 1.2 The Plan was submitted to West Suffolk Council (WSC) by Withersfield Parish Council (WPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises indirectly from my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the development plan. It provides a context in which the neighbourhood area can maintain its character and appearance.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Plan would then be used to determine planning applications within the neighbourhood area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by WSC, with the consent of WPC, to conduct the examination of the Plan and to prepare this report. I am independent of both WSC and WPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. I have 43 years' experience either in various local authorities at either Head of Planning or Service Director level or since 2016 as an independent examiner. I have significant experience of undertaking neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met subject to the modifications in this report.

3 Procedural Matters

- 3.1 In undertaking this examination I have considered the following documents:
- the submitted Plan (and its appendices)
 - the Basic Conditions Statement.
 - the Consultation Statement.
 - the SEA and HRA screening reports.
 - the representations made to the Plan.
 - WPC's responses to the clarification note.
 - the adopted West Suffolk Local Plan.
 - the National Planning Policy Framework December 2024.
 - Planning Practice Guidance.
 - relevant Ministerial Statements.
- 3.2 I visited the neighbourhood area on 31 October 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan.
- 3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I concluded that the Plan could be examined by way of written representations. I was assisted in this process by the comprehensive nature of many of the representations and the detail within the package of submission documents.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such, the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended), WPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and the policies in the Plan. It is presented in a concise fashion and is supported by six detailed appendices. The Statement summarises the approach which WPC took on consultation and engagement as the Plan was being prepared.
- 4.3 Section 4 of the Statement comments about the initial phases of engagement which led up to the pre-submission version of the Plan (November 2022 to January 2023). The engagement is helpfully set out in three stages.
- 4.4 Section 4 of the Statement also summarises the comments received on the pre-submission version of the Plan and provides details of the ways in which the document was refined because of this process. It is supported by the details in Appendix F. This information helps to describe the way in which the Plan evolved.
- 4.5 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. WSC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.6 Consultation on the submitted Plan was undertaken by WSC. It ended on 15 October 2025. This exercise generated representations from the following organisations:
- Jaynic Properties Limited
 - National Gas
 - Suffolk Wildlife Trust
 - Historic England
 - National Highways
 - Natural England
 - Sport England
 - Pigeon (and associated landowner)
 - West Suffolk Council
- 4.7 Representations were also received from parishioners.

- 4.8 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Withersfield. It is an attractive linear village located to the north of Haverhill. Its population in 2021 was 516 persons. It was designated as a neighbourhood area on 24 January 2020.
- 5.2 The main built-up part of Withersfield is focused around the junction of Church Street, Queen Street and Thurlow Road. It includes the Village Hall, St Mary the Virgin church and the White Horse public house. The remainder of the parish is primarily rural and in agricultural use.
- 5.3 An interesting element of the character of the neighbourhood area is the prominence of two green spaces. The first is Town Green which is the lower remaining part of the historic village green and plays an essential role in shaping the character and identity of the village. The second is Burton Green. It is a surviving remnant of the historic village green towards its upper end, and lies at the heart of the Burton Green and Rose Hill part of the village. The Plan advises that it is a tranquil space occasionally used for informal recreation.

Development Plan Context

- 5.4 The West Suffolk Local Plan was adopted on 15 July 2025. The submitted neighbourhood plan was developed as the Local Plan was being prepared
- 5.5 Policy SP13 of the Local Plan identifies a Settlement Hierarchy. Withersfield is one of a series of Type B villages. The Plan advises these settlements have a very limited range of or no services and poor accessibility to public transport. It is likely that residents will rely on the private car to travel to meet their day-to-day needs. In these villages no sites are allocated through the local plan and only limited infill development or affordable housing exception sites would be permitted, where it accords with other policies in the development plan.
- 5.6 The following other strategic policies in the Local Plan are relevant to the submitted Plan:
- Policy SP1 The climate and environment emergency and sustainable development
 - Policy SP2 Flood risk and sustainable drainage
 - Policy SP4 Design
 - Policy SP14 Housing needs
 - Policy SP15 Neighbourhood plans
 - Policy SP16 Affordable Housing
 - Policy SP17 Housing type and tenure
 - Policy SP23 General employment and rural employment areas
 - Policy SP24 Economic development and essential utilities in the countryside

- 5.7 The Plan has been prepared within this wider context and has relied on up-to-date information. It also seeks to give a local dimension to the relevant policies in the Local

Plan. This is best practice, and the approach taken is helpfully captured in the Basic Conditions Statement.

Visit to the neighbourhood area

- 5.8 I visited the neighbourhood area on 31 October 2025. I approached it from Haverhill to the south. This helped me to understand its position in the wider landscape and its relationship to the strategic road network (A1307).
- 5.9 I looked initially at the countryside between Haverhill and Withersfield and as proposed as a Landscape Buffer in Policy WITH4 of the Plan.
- 5.10 I then spent time in Withersfield. I saw the importance of the Village Hall, St Mary the Virgin Church, and the White Horse Public House.
- 5.11 I also looked at the proposed Local Green Spaces in the village. In doing so, I saw the significance of Town Green and Burton Green.
- 5.12 I left the neighbourhood area and drove to West Wrating to the north and west. As with the initial part of the visit, this helped me to understand its position in the wider landscape and its accessibility to the strategic road network (in this case the A11).

6 The Neighbourhood Plan and the Basic Conditions

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.

6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan in the area;
- not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings:

National Planning Policies and Guidance

6.3 For the purposes of this examination, the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2024 (NPPF).

6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Withersfield Parish Neighbourhood Development Plan:

- a plan-led system - in this case the relationship between the neighbourhood plan and the West Suffolk Local Plan;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.5 Neighbourhood plans sit within this wider context both generally and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic

needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy, including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It proposes a Landscape Buffer between Withersfield and Haverhill, and includes policies on local green spaces, design, and the natural environment.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. The Guidance also advises that policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted, the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has sought to achieve sustainable development in the neighbourhood area. In the social dimension, it includes policies on dark skies (Policy WITH5), and buildings of local importance (Policy WITH2). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on design (Policy WITH1), on local green spaces (Policy WITH3), and on a landscape buffer (Policy WITH4). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in West Suffolk in paragraphs 5.4 to 5.7 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject

to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, WSC prepared a Screening Report for the Plan. The report (February 2025) is thorough and well-constructed. It concludes that environmental effects can be screened out and that a Strategic Environmental Assessment is not needed.

Habitats Regulations Assessment

- 6.15 WSC also screened the need for a Habitats Regulations Assessment (HRA) of the Plan at the same time. The report is very comprehensive. It advises that there are no habitats sites within the neighbourhood area. Nevertheless, it advises that habitats sites outside of the neighbourhood plan area but within 20 km include Devils Dyke Special Area of Conservation (12 km), Breckland Special Protection Area (SPA) (nearest component is 19km), and the Chippenham Fen Ramsar (19km).
- 6.16 It advises that the Plan does not in itself intend to allocate any sites for development and there are no potential pathways for impacts on the habitats sites that are all located a significant distance from the plan boundary. The screening assessment of the policies in the Plan therefore concludes that likely significant effects can be excluded in relation to all policies presented within the submitted Plan.
- 6.17 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns on this matter. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with the relevant regulations.

Human Rights

- 6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and WPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning practice guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan.
- 7.6 For clarity, this section of the report comments on each of the policies in the Plan.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial parts of the Plan (Parts 1-4)

- 7.8 The Plan is organised and presented in a positive way. It makes an appropriate distinction between the policies and their supporting text. The Plan is concise and concentrates on a carefully selected areas of local concern and interest.
- 7.9 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.10 The Introduction (Section 1) defines the neighbourhood area (Plan A), and the Plan period (in paragraph 1.3). It also comments about the basic conditions.
- 7.11 Section 2 provides information about the neighbourhood area. It includes interesting and comprehensive details which help to set the scene for the eventual policies.
- 7.12 Section 3 comments about the planning policy context within which the Plan has been developed. It addresses both national and planning policy. The Local Plan has been adopted since the Neighbourhood Plan was prepared and submitted. I recommend later in this report that the section on the Local Plan is updated.
- 7.13 Section 4 comments about the Plan's Vision and objectives. The Vision provides a good summary of the overall approach as follows:

'The village of Withersfield will have conserved its special historic interest as schemes to change, extend, or redevelop buildings will have been of a high quality and fitted in

with the grain and character of the village. Some sensitive infill will have led to a small number of new, affordable homes being built.

The village hall and pub will remain the centre of community life and Town Green and Burton Green will continue to be precious open spaces. Our most important historic buildings will have survived in good repair and together with other buildings that remind us of our past and our wealth of local nature, we will have kept our rural identity.

Although Haverhill will have continued to grow it will have crept no closer to the village and the new residential scheme at the Arboretum will have stitched well into the existing community. Hanchett End will have remained a rural lane and Barsey Green a valued public open space. The Haverhill Research Centre will have been completed to provide a valuable source of local employment and allow some residential development.

The roads through the village will have got no busier. There will have been a significant switch to EV vehicles in the area, making the village quieter.'

- 7.14 The Vision is supported by the series of objectives set out in paragraph 4.2 of the Plan.
- 7.15 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy WITH1 Design Quality

- 7.16 This policy recognises the distinct, historic village of Withersfield. It requires applicants to acknowledge, understand and respond to the Withersfield Parish Design Code. It advises that the Code has been derived from an assessment of the Withersfield Conservation Area and the built-up area at Hanchett End undertaken as part of the preparation of the Plan and has used the approach recommended by the National Model Design Code where relevant to the parish.
- 7.17 The hyperlink on page 36 of the neighbourhood plan links to the Withersfield Design Code and is intended to be appendix A of the Plan as referred to in the support text to policy WITH1. Nevertheless, the hyperlink to the design code is not labelled as 'appendix A' in the document and WSC recommend that a modification is made to list the Withersfield Design Code as appendix A and that the other appendices are renumbered accordingly. I address this matter in paragraph 7.51 of this report.
- 7.18 WSC has advised that the public and interested parties had the opportunity to comment on all aspects of the Withersfield Neighbourhood plan, including the appendices during the Regulation 16 consultation. I also note that the Design Code was available to comment during the pre-submission consultation as a separate document in 2022. The comments received at that stage of the Plan preparation process on this matter are recorded in the submitted Consultation Statement.
- 7.19 In general terms I am satisfied that the policy takes a positive approach both to the location of new development and to its design. The Design Code is well-prepared and locally-distinctive. In this context it is a good local response to Section 12 of the NPPF. Nevertheless, I recommend that the wording used in the policy is clearer and that the

Settlement boundary is referenced to the policies map. In both cases these modifications will bring the clarity required by the NPPF.

- 7.20 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the policy with:

‘Development proposals within the Withersfield Housing Settlement Boundary (as shown on the Policies Map) will be supported where they respond positively to the Withersfield Parish Design Code and other policies in the development plan.’

Policy WITH 2 Buildings of Local Importance

- 7.21 This policy identifies a series of buildings and structures (known as ‘Buildings of Local Importance’ in West Suffolk) highlighted in the Design Code as having some local architectural and/or historic interest to the extent that they can be defined as non-designated heritage assets. The Plan advises that this process gives weight to such ‘assets’ in decision making in accordance with the nature of their interest. The Plan advises that the list in the policy is not exhaustive as further Buildings of Local Importance may be added as they are discovered.
- 7.22 This is an excellent policy which adds a local dimension to the details in Section 16 of the NPPF. I looked at the proposed buildings of local importance during the visit. The reasons for their selection were self-evident.
- 7.23 In this broader context, I recommend that the final part of the policy is modified to ensure that it relates to development proposals which would directly affect any of the proposed buildings of local importance. I also recommend modifications to the supporting text so that it comments more generally about national policy and refers to the recently-adopted Local Plan rather than a previous component of the development plan. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the final part of the policy with:

‘Development proposals affecting the identified buildings should demonstrate that the significance of its role as a Local Heritage Asset has been understood and considered in determining the scale of any harm to or loss of that significance.’

Replace 4.10 with:

‘This policy identifies buildings and structures (known as ‘Buildings of Local Importance’ in West Suffolk) highlighted in the Design Code as having some local architectural and/or historic interest to the extent that they can be defined as ‘non-designated heritage assets’ in accordance with Section 16 of the NPPF. This gives weight to such ‘assets’ in decision making in accordance with the nature of their interest, as does Policy LP36 of the Local Plan which provides greater detail on how benefit and harm are measured, and on the information required from applicants. This

list is not exhaustive as further Buildings of Local Importance may be added as they are discovered.'

Policy WITH 3 Green Infrastructure and Local Green Spaces

- 7.24 The Plan advises that this policy refines Policy RV9 of the 2014 Rural Vision and Policy HV18 of the Haverhill Vision by defining in greater detail how the former St. Edmundsbury Green Infrastructure Strategy (superseded by the West Suffolk Green Infrastructure Study April, 2022) and Haverhill Green Infrastructure Opportunity Map relate to the parish. Using relevant information and evidence from other sources, a network of green infrastructure assets has been identified. The policy requires proposals to acknowledge, understand and respond to the definition of the network in relation to their local, scale and nature.
- 7.25 A key element of the policy is the identification of four local green spaces (LGSs).
- 7.26 In general terms the policy takes a positive approach to these issues and has regard to Sections 8 and 15 of the NPPF.
- 7.27 I looked at the proposed LGSs during the visit. Based on my observation and the evidence in the Plan and Appendix B, I am satisfied that they meet the criteria in paragraphs 106 and 107 of the NPPF. I note the comments made by Suffolk County Council on the designations of the LGSs. Nevertheless, I am satisfied that a proportionate assessment has been undertaken by WPC. I also note that no objections have been received from the various landowners.
- 7.28 I recommend that part C of the policy is modified so that it takes the matter-of-fact approach in paragraph 108 of the NPPF.
- 7.29 Finally I recommend that the structure of the policy is modified by way of the combination of the introductory element and part A. As submitted, the former reads as supporting text in isolation from part A of the policy.
- 7.30 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the introductory element and Part A with:

'The Neighbourhood Plan identifies a Green Infrastructure Network, as shown on the Policies Map, comprising sites of special scientific interest, county wildlife sites, woodlands, significant trees and hedges, water courses and bodies, green spaces, footpaths, and bridleways. Development proposals that lie within or adjacent to the Network should respond positively to its natural features and demonstrate that they will not undermine its ecological or functional integrity by way of their location, scale, and nature. Proposals that will lead to an improvement to a specific feature or to the spatial connection between features, and that are suitable in all other relevant matters, will be supported.'

Replace Part C with:

‘Development proposals for the identified Local Green Spaces should be consistent with national policy on Green Belts.’

Policy WITH 4 Landscape Buffer

7.31 The Plan advises that this policy aims to protect the open gap between the village and the northern expansion of Haverhill by refining the ‘Settlement Identity Buffer’ shown on the Key Diagram of the 2010 Core Strategy in relation to its Policy CS4. WPC considers that Haverhill is creeping slowly towards the village and the evidence base of the emerging Local Plan indicates that the town will continue to grow. WPC also comments in the supporting text that what was a precious gap between the village and town in 2010 is even more so now, especially at night when the glow of urban lights to the south of the village is considerable.

7.32 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 in the clarification note I sought advice from WPC about the following matters:

- is the title of ‘Landscape Buffer’ appropriate and/or correct?
- noting that the supporting text refers to former development plan documents rather than to the recently adopted Local Plan does the policy have regard to strategic policies in the current development plan?
- 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?

7.33 In its response to the clarification note, WPC advised that:

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) (and in particular) Strategy Policy 21 Housing in the Countryside.’

7.34 Pigeon objects to the policy. The key elements of its representation are as follows:

‘In the Basic Conditions Statement (July 2025) it states in relation to Policy WITH4 that ‘the policy contributes to conserving the natural and local environment by protecting a specific type of valued landscape in a manner that is commensurate with its identified quality in the evidence base’.

No specific national guidance is provided on what constitutes a ‘valued landscape’. However, paragraph 188 of the NPPF states that ‘plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries’.

Paragraph 189 of the NPPF states that the highest status of protection should be afforded to National Parks, the Broads and Areas of Outstanding Natural Beauty (National Landscapes).

The commentary in the Basic Conditions Statement (July 2025) is therefore considered to misrepresent the value of the land. The other issue also being that there is no evidence base on this matter, therefore it is entirely unclear what ‘identified quality’ has been concluded and what methodology or framework it might have been based on.

Policy SP6 of the West Suffolk Local Plan relates to ‘locally valued landscapes’ and includes mapping which identifies areas recognised as such. One of the locally valued landscapes shown is the ‘Upper Stour Valley’ which wraps around the east of Haverhill, extending northwards and further east. None of the land within the Withersfield Neighbourhood Plan area is within this identified landscape, and certainly not therefore the area that has been identified as a buffer under Policy WITH4.

Whilst it is recognised that the Neighbourhood Plan can identify considerations and protections which the Development Plan does not, the main issue is that the landscape buffer identified under Policy WITH4 is not supported by any justification in the evidence base for such a designation. Neither in the evidence base on the Local Plan, which included landscape evidence, nor in the evidence base of the Neighbourhood Plan itself.

It is however noted that the intention behind Policy WITH5 appears to be focused on the desire to direct development away from this area to prevent any coalescence between Haverhill and Withersfield.

It is therefore queried on what basis the Neighbourhood Plan has justified the conclusion that the area of land adjacent to the northern boundary of Haverhill has been determined as the 'landscape buffer' as opposed to the land directly around the southern boundary of Withersfield itself, which would be a more appropriate means of protecting the village. Subject to evidence justifying the need for this. Again, referring back to the Vision and the ambitions set out within this, the restriction of development adjacent to Haverhill would not protect Withersfield in the way that Vision seeks to.

Haverhill is clearly a highly sustainable settlement within the district and is identified as such in Local Plan Policy SP13, which places Haverhill in the top five category of the settlement hierarchy alongside Brandon, Bury St Edmunds, Mildenhall and Newmarket. Haverhill is therefore a settlement which is highly suitable for growth, but this will be restricted in the future to the east by the Locally Valued Landscape under Local Plan Policy SP6. It is therefore inappropriate to speculatively protect further areas of land under the Neighbourhood Plan that could accommodate the sustainable future growth of Haverhill, subject to robust future landscape and townscape assessment.

The edge of each settlement is defined by the Housing Settlement Boundary in the Local Plan and at its closest point, the separation distance between the two settlement boundaries is 1.01km. However, development within both settlements extends beyond the Housing Settlement Boundary. This therefore affects the perceived separation.'

- 7.35 I sought WPC's views on this representation. In its response to the clarification note it commented that:

'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.'

- 7.36 I have considered the policy, the responses to the clarification note and the response to the Pigeon representation very carefully. The submitted policy raises the following overlapping issues:

- strategic policy considerations;
- the appropriateness of defining a buffer between Haverhill and Withersfield and the development pressures within the buffer; and
- the size and extent of the proposed buffer.

- 7.37 On the strategic policy considerations issue, the supporting text refers both to the 2010 Core Strategy and to the Joint Development Management Policy Document. It is silent on what was the emerging Local Plan (as the neighbourhood plan was being prepared) and which is now the adopted Local Plan. Nevertheless, paragraph 4.18 of the submitted neighbourhood plan advises that the policy:

'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.'

- 7.38 Policy SP21 (Housing in the Countryside) of the recently-adopted Local Plan is one of a series of strategic policies. It identifies criteria whereby new dwellings will be permitted in the countryside. The Local Plan advises that the purpose of this policy is to support limited housing development in small cohesive groups of dwellings outside defined housing settlement boundaries, to enhance or maintain the vitality of West Suffolk's rural communities. The policy also includes the following additional component:

'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.'

- 7.39 The explanation associated with this policy comments mainly about the geography of the West Suffolk being such that there are many small, dispersed communities of housing outside of the defined housing settlements boundaries in the Local Plan and policies map. Such communities do not have the level of services and facilities to support larger scale new housing development (and hence do not have settlement boundaries) but a small amount of development may help to meet local housing needs, enable people to stay within rural communities and help to sustain these rural communities and any existing services and facilities within them. It also comments that the countryside needs to be protected from inappropriate development which would detract from the rural character and landscape quality of the area.
- 7.40 The explanation associated with the policy offers no suggestion that either WSC or qualifying bodies preparing neighbourhood plan should identify parcels of land which may need to be safeguarded to prevent the coalescence of adjacent settlements. Other elements of the Local Plan identify settlement boundaries (for both Withersfield and Haverhill) alongside a broader approach towards development in the countryside (outside the identified settlement boundaries). Policy SP12 of the Local Plan provides a very clear spatial strategy for West Suffolk which focuses new development within settlement boundaries and ensures that the intrinsic benefits, character, and beauty of land designated as countryside on the policies map is recognised, and is protected from unsustainable development.
- 7.41 In this broader context I consider that the policy sets out a strategic approach towards maintaining the distinction between Haverhill and Withersfield which goes beyond the definition of settlement boundaries and the more general requirements of other policies in the Local Plan. National legislation is clear that a neighbourhood plan should not address strategic issues.

- 7.42 On the second issue I have carefully considered the appropriateness of defining a buffer between Haverhill and Withersfield and the development pressures within the identified area. I saw on the visit that there is considerable distance between Haverhill and Withersfield. In this context, the separation between the two settlements and the size of the proposed Landscape Buffer as proposed on the Policies Map are both significantly larger than landscape buffers/settlement gaps traditionally proposed in other neighbourhood plan which seek to protect much smaller parcels of land between two villages, or between separate elements of the same village. In this case, any new development that would cause the coalescence of Haverhill with Withersfield would be of a strategic scale which would conflict with the approach taken in the adopted Local Plan where the future development of Haverhill is addressed in Policies AP13-15. In reaching this conclusion I have taken account of Pigeon's representation on the Plan. It proposed residential development at Hales Barn Road Haverhill was not included in the West Suffolk Local Plan due to a combination of factors which included the potential impacts to West Suffolk Landscape Character Assessment (2022).
- 7.43 In this broader context I have concluded that there are no specific factors which have justified the approach taken in the Plan.
- 7.44 On the third issue I have carefully considered the size and extent of the proposed Landscape Buffer. As the Plan describes it seeks to defines the minimum area of land that WPC 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. I have already commented about the proposed size of the Buffer in paragraph 7.42 of this report. I also note that the Plan offers no detailed explanation about the way in which the Buffer has been identified. I also note that the extent of the Buffer is such that it would largely prevent the expansion of Haverhill to the north rather than safeguarding the setting of Withersfield. Whilst I acknowledge that the proposed Buffer is within the neighbourhood area, I have already concluded (in paragraph 7.41 of this report) that the effect of the policy is strategic in nature, and this is reinforced as Haverhill is a Town (the highest category) in the Local Plan settlement hierarchy.
- 7.45 In all the circumstances I recommend the deletion of the policy and the associated supporting text. This conclusion should not be taken as anything else other than an assessment of the policy against the basic conditions. I am satisfied that the recently-adopted Local Plan includes a range of strategic policies to secure the outcomes that WPC seeks to achieve regarding the ongoing separation of Withersfield from Haverhill.

Delete the policy

Delete paragraphs 4.17 to 4.18

Delete the reference to Policy WITH4 (incorrectly identified as Policy WITH5) from the Policies Map

Policy WITH 5 Dark Skies

- 7.46 The Plan comments that there is limited street lighting in Withersfield. It also advises that the major development and highways schemes of the Haverhill expansion on the southern edge of the parish have had an impact on existing lighting levels.

- 7.47 In general terms the policy takes a positive approach to this important matter. I saw the importance of the dark skies' environment during the visit. In this broader context I recommend that the policy is recast so that it has a more natural flow and relates relevant points one to the other. As part of this process, I recommend that 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. I also recommend that the final part of the policy is repositioned into the supporting text. This acknowledges that it describes how the policy will be implemented rather than being a land use policy.
- 7.48 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Development proposals should be designed to reduce the occurrence of light pollution wherever practicable, or as a minimum, kept to current levels. New or replacement external lighting, and other externally projected lighting, should:

- **demonstrate a need for new external lighting for its intended purpose, including safety and/or operational requirements, through clear evidence or significant community demand; and**
- **use energy-efficient forms of lighting that reduce light scatter.**

Permanent street lighting will not be supported in the Withersfield Village area, except where it is required to address highways or public safety matters.'

At the end of paragraph 4.21 add:

'Development proposals should demonstrate how they have been designed to prevent light pollution. Information on these measures should be submitted with development proposals. Where a development would potentially impact on light levels in the area, an appropriate lighting scheme will be secured by planning condition. Wherever it is practicable to do so, proposals should meet or exceed the current guidelines established for rural areas by the Institute of Lighting Professionals.'

Other Matters – General

- 7.49 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters, including policy numbering arising from the recommended deletion of Policy WITH4. It will be appropriate for WSC and WPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

Other Matters – Specific

- 7.50 WSC has raised a series of issues on the Plan. Those which relate to specific policies have been addressed earlier in the report.
- 7.51 WSC also raise a more general range of issues. In the main, they propose updates or factual corrections to the Plan. I have noted WPC's responses to the matters. In this context I recommend that the following matters are addressed/incorporated in the Plan (using the referencing system in WSC's representation):
- General
 - Paragraph 1.7
 - Page 17
 - Paragraph 3.8
 - Section 3 (updates to the references to the development plan)
 - Paragraph 4.7
 - Paragraphs 4.10/4.11/4.17
 - Pages 33/35/36
 - Appendices A-C
- 7.52 WPC has responded positively to the representation from Jaynic Properties Limited in relation both to its site and to the adoption of the West Suffolk Local Plan. I recommend that appropriate factual modifications and updates are made to paragraph 1.3 of the Plan

Make appropriate factual modifications and updates to paragraph 1.3 of the Plan

8 Summary and Conclusions

Summary

8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2040. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area.

8.2 Following the independent examination of the Plan, I have concluded that the Withersfield Parish Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

8.3 On the basis of the findings in this report, I recommend to West Suffolk Council that, subject to the incorporation of the modifications set out in this report, the Withersfield Parish Neighbourhood Development Plan should proceed to referendum.

Other Matters

8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as most-recently was approved on 24 January 2020.

8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses from the Parish Council to the clarification note were both detailed and informative, and West Suffolk Council managed the overall process in a very efficient manner.

Andrew Ashcroft
Independent Examiner
23 January 2026