

## **Great Barton Neighbourhood Development Plan Regulation 16 Submission Consultation Responses**

In May 2020, Great Barton Parish Council (the 'qualifying body') submitted their Neighbourhood Development Plan to West Suffolk District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

The consultation period ran from 10 June until 19 August 2020.

In total, 17 individual responses were received. They are listed below and copies of their representations are attached.

1. Anglian Water
2. Baker
3. Broughton
4. Browning
5. Hale
6. Highways England
7. Montagu Evans obo West Suffolk Council and Suffolk County Council
8. National Grid
9. Natural England
10. NHS West Suffolk CCG
11. Sheppard
12. Sport England
13. Suffolk County Council
14. Suffolk Fire and Rescue
15. Thorneley
16. West Suffolk Council
17. West Suffolk Council Strategic Housing

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**From:** Patience Stewart  
**Sent:** 15 June 2020 09:01  
**To:** neighbourhood.planning  
**Subject:** Re: Great Barton Neighbourhood Plan consultation - Wednesday 10 June (9am) to Wednesday 19 August (5pm) 2020

[THIS IS AN EXTERNAL EMAIL]

Dear Sir/Madam,

Thank you for the opportunity to comment on the Great Barton Submission Neighbourhood Plan. The following comments are submitted on behalf of Anglian Water.

I would be grateful if you could confirm that you have received this response.

### **Policy GB1: Spatial Strategy**

In our previous comments we had raised concerns that Policy GB1 as drafted did not refer to water and wastewater infrastructure as being acceptable in principle in the designated countryside.

We note that in response to Anglian Water's previous comments it is stated that such works would normally fall within permitted development rights and therefore no changes to Policy GB1 are proposed.

However not all works undertaken by Anglian Water would have the benefit of permitted development rights as suggested. For example any planning applications for water supply infrastructure (both potable and raw water) above or below ground would be determined by West Suffolk Council.

Further details of Anglian Water's permitted development rights for both water supply and wastewater infrastructure are outlined in the Town and Country Planning General Permitted Development Order 2015(Part 13 of the Order).

<http://www.legislation.gov.uk/ukxi/2015/596/contents/made>

Policy GB1 does not allow for development which requires planning permission being brought forward by Anglian Water within the designated countryside. As such this could limit our ability to make provision for water and water recycling infrastructure to serve our customers.

We therefore the remain of the view that the Neighbourhood Plan should be amended to acknowledge development which requires planning permission which is proposed by Anglian Water as an infrastructure provider within the designated countryside provided for our customers.

It is therefore recommended that the following supporting text be added to the Neighbourhood Plan:  
'For the purposes of point a) of policy GB1 this would include development required by a utility company to fulfil their statutory obligations to their customers.'

### **Policy GB13: Development Design Considerations**

We note that Policy GB13 (formerly Policy GB12) has been amended to refer to surface water harvesting as previously recommended by Anglian Water.

Anglian Water fully support the requirement to include water re-use measures as outlined in Policy GB13.

### **Future Notifications**

We would wish to be notified of the examination, the outcome of the examination and any subsequent decision made by the Council relating to the Neighbourhood Plan.

Should you have any queries relating to this response please let me know.

Regards,

**Stewart Patience, MRTPI**

Spatial Planning Manager

### **Anglian Water Services Limited**

Anglian Water, Thorpe Wood House, Thorpe Wood, Peterborough, Cambridgeshire. PE3 6WT



**From:** Andy Baker  
**To:** [neighbourhood.planning](#)  
**Subject:** Great Barton Neighbourhood Plan Consultation  
**Date:** 11 June 2020 20:34:46

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[THIS IS AN EXTERNAL EMAIL]

Hi

I feel the plan is comprehensive and well documented.

I support it as a resident of Great Barton.

One note of disappointment is the parish council has little or no impact on larger scale transportation plans such as a bypass for the village, as the A143 dissects the village in half! Bringing significant environmental and safety concerns to the village.

Especially when developments outside of West Suffolk County Council are starting to have a significant impact affecting road traffic

Kind Regards

Andrew Baker

Great Barton

**From:** James Broughton  
**To:** [neighbourhood.planning](#)  
**Subject:** Neighbourhood Plan- Comment  
**Date:** 17 August 2020 11:49:53

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[THIS IS AN EXTERNAL EMAIL]

Great Barton Neighbourhood Plan.

I am the owner of Barton Stud, Barton Farm Partnership and Manor Farm Partnership within Great Barton, and am writing to object to certain policies within the Neighbourhood Plan and the manner in which it has been implemented.

I operate a commercial Thoroughbred Stud Farm within Great Barton, called Barton Stud, which rears and cares for thoroughbred horses. The business employs 15 people looking after over 200 thoroughbreds for clients all over Europe and consign horses at all major British auction sales.

I also run a farm growing arable crops within the village. Over the last 5 years we have diversified some of our agricultural buildings, and converted former Dairy units into 9 commercial office units (known as Manor Park, Church Road, Great Barton, IP31 2QR). Until Covid 19 these were all rented well, and now tenants of four of the units have given notice. The Neighbourhood Plan has identified this as commercial/ office use - I have serious concerns that if people continue to work from home there will be no demand for rural office space. I therefore object strongly that this should be allocated as only commercial office use. The Government allows change of use from office to residential but under the Neighbourhood Plan this will not be allowed which seems to go against Government Guidelines. The Neighbourhood Plan policy GB 6 says these should be retained, as employment but the units at Manor Park are adjacent to farm buildings one of which is a large grain store and another a store for farm use, therefore this area is not purely employment land and therefore contradicts the policy that the Neighbourhood Plan suggests.

15 years ago we converted what was a dilapidated Grade 11\* thatched barn , Manor Barn, Church Road, Great Barton, IP31 2QR to high quality office space - this again is in the Neighbourhood plan as designated as commercial/ employment Policy GB 6. What happens when there is no demand for commercial offices, and this is more likely since Covid 19 . Again I object to this proposal of the Neighbourhood Plan.

I am also disappointed that as the owner of three cottages called Anglenook Cottages which are on the A143 I was not written to directly to say that the Neighbourhood Plan thought they should be listed as buildings of local significance- GB14. I was only written to once my wife discovered this, after the publication of the Draft Neighbourhood Plan.

At no point has the Neighbourhood Plan committee tried to engage with me directly as a landowner or employer within the village. I have on occasion looked up the agenda and minutes from the Neighbourhood Plan committee and to my disappointment often the agenda is placed on the parish council website on the day of the meeting or at times months later, and the minutes are also placed on the website months later. It has therefore been impossible to follow the Neighbourhood Plan in any orderly or meaningful way.

It is a disappointment that the Neighbourhood Plan have failed to engage with me directly as an employer and landowner within Great Barton and therefore I cannot

support the Neighbourhood Plan and I strongly object to polices No: GB 6 and GB 14.

Hon James H A Broughton  
Great Barton

**From:** James Browning  
**To:** [neighbourhood.planning](#)  
**Subject:** Great Barton neighbourhood planning consultation  
**Date:** 15 July 2020 13:57:15

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[THIS IS AN EXTERNAL EMAIL]

Hi,

We are currently in the process of buying a property in Maple Green, Great Barton. In the Great Barton Neighbourhood Plan that is currently under consultation, the Parish Council has asked for Maple Green and Conyers Way to be given the designation of 'local green space'. What does this actually mean if it is approved? Will the above areas receive legislative protection from future development?

We were hoping to have this clarified before we get any further in the purchasing process.

Many thanks in advance.

Kind regards,

James and Lydia

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**From:** Robert Hale  
**Sent:** 10 June 2020 16:01  
**To:** neighbourhood.planning  
**Subject:** Great Barton Neighbourhood Plan Consultation

[THIS IS AN EXTERNAL EMAIL]

FAO Marie Smith  
Strategic Planning Service Manager

Whilst disappointed to see that Thurston Road, Great Barton which has been evidenced by Vehicle Activated Signs as being a road where speeding vehicles are also common place and drivers act with impunity travelling at speeds of 40 / 50 / 60 and recorded at over 70 mph - is not mentioned in the plan proposal and I believe should be - see Map 10 page 63; in all other respects I / we think the plan proposal fulfils the "basic conditions"

Robert Hale and Jane Hamblin  
Great Barton  
Bury St Edmunds Suffolk



**From:** [Planning EE](#)  
**To:** [neighbourhood.planning](#)  
**Subject:** Great Barton Neighbourhood Plan  
**Date:** 26 June 2020 09:38:17  
**Attachments:** [Great Barton Neighbourhood Plan\\_Highways England\\_Letter response 250620 \(002\).pdf](#)  
**Importance:** High

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[THIS IS AN EXTERNAL EMAIL]

Dear Sir/Madam

Please find the attached Highways England comments on the above neighbourhood plan.

Yours faithfully

Connor Adkins

**Connor Adkins**

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

Web: <http://www.highways.co.uk>

GTN: 0300 470 4744

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Our ref:  
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Sent by email:  
[neighbourhood.planning@westsuffolk.gov.uk](mailto:neighbourhood.planning@westsuffolk.gov.uk)

Highways England  
Woodlands  
Manton Lane  
Bedford MK41 7LW

25 June 2020

Dear Sirs

## **Great Barton Neighbourhood Plan (Regulation 15 submission version)**

Thank you for consulting with Highways England on the Great Barton Neighbourhood Plan.

The Neighbourhood Plan covers an area which incorporates the village of Great Barton and surrounding countryside. The area is crossed by the A143 and bounded to the south by the Ipswich-Ely railway line.

Further to the south is the A14 which is managed by Highways England with four likely points of access in the area at Junction 43 (via the A143 towards Bury St Edmunds town centre), Junction 44 (via Moreton Hall, Bury St Edmunds), Junction 45 (via Sow Lane) and Junction 46 (via Thurston).

We welcome the policies and proposals within the plan to encourage sustainable travel across the local area, including The Severals development in the North East of Bury St Edmunds, which reinforce policies in the Core Strategy Local Plan.

The A143 forms part of the local road network and runs through the village of Great Barton. We note that the plan highlights an issue with the A143's role in facilitating inter-urban trips between the Norfolk/Suffolk coast at Great Yarmouth and Lowestoft, and the A14 at Bury St Edmunds.

The movement of longer distance through-traffic along the A143 is a strategic highway matter outside the remit of a Neighbourhood Plan which the plan acknowledges. This is a matter which the local highway authority may wish to consider outside of the plan, and Highways England 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.



We have no further comment to make in relation to the Neighbourhood Plan or supporting documents.

Yours sincerely

Simon Willison

[planningEE@highwaysengland.co.uk](mailto:planningEE@highwaysengland.co.uk)

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**From:** Nadine James  
**Sent:** 19 August 2020 09:13  
**To:** neighbourhood.planning  
**Cc:** David Mabb; Will Edmonds  
**Subject:** Great Barton submission consultation - Representations  
**Attachments:** Great Barton Neighbourhood Plan Representations - West Suffolk and Count....pdf

[THIS IS AN EXTERNAL EMAIL]

Dear Sir/Madam

On behalf of West Suffolk Council and Suffolk County Council please find attached representations in relation to the Great Barton Neighbourhood Plan Consultation exercise.

I would be grateful if you could confirm receipt of these representations.

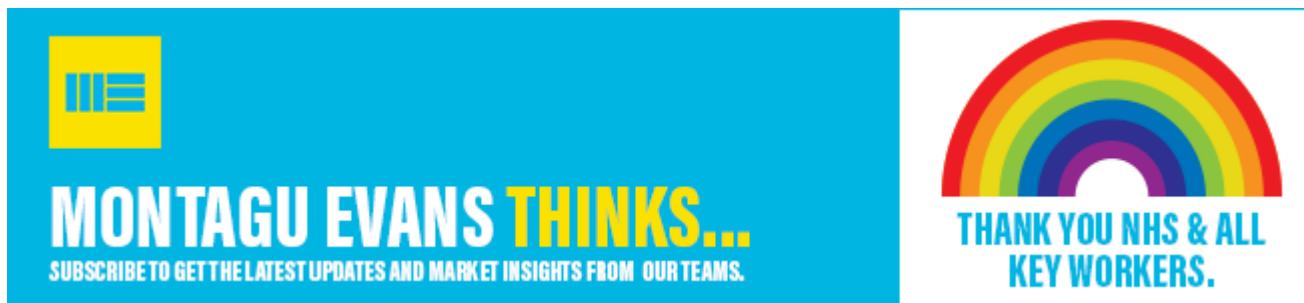
Kind regards

Nadine

**NADINE JAMES**  
**PLANNER**

Montagu Evans LLP, 5 Bolton Street, London, W1J 8BA

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Strategic Planning  
West Suffolk Council  
West Suffolk House  
Western Way  
Bury St Edmunds  
IP33 3YU

19 August 2020

Dear Sir / Madam

**GREAT BARTON NEIGHBOURHOOD PLAN: SUBMISSION CONSULTATION (REG 16)**  
**WRITTEN REPRESENTATION BY MONTAGU EVANS LLP ON BEHALF OF WEST SUFFOLK COUNCIL AND SUFFOLK COUNTY COUNCIL**  
**TOWN AND COUNTY PLANNING ACT 1990 (AS AMENDED)**

**INTRODUCTION**

We are instructed by West Suffolk Council and Suffolk County Council (“the Clients”) to submit representations in respect of the Draft Great Barton Neighbourhood Plan (“the Neighbourhood Plan” / “GBNP”).

The Clients’ have control of land at Mill Road and School Road, Great Barton (“the Site” / “the Triangle”). Representations were submitted to Great Barton Parish Council on 25 February 2020 on behalf of the Clients’ in relation to the Pre-submission Consultation of the Draft Neighbourhood Plan (Regulation 15), which expired on 2 March 2020.

A number of unresolved policy issues were identified at that consultation stage which the Clients’ would like to bring to the Examiner’s attention (via these subsequent representations) to ensure the GBNP can be effectively applied when adopted, in accordance with National and Local Policy and Guidance.

The GBNP has to be independently examined following processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the subsequent Neighbourhood Planning (General) Regulations 2012.

In line with Paragraph 8, Schedule 4B of the Town and Country Planning Act 1990 (as amended), the GBNP must meet the following ‘Basic Conditions’:

1. Have regard to national policy and guidance from the Secretary of State;
2. Contribute to sustainable development;
3. Be in general conformity with the strategic policy of the Development Plan for the area or any part of that area; and
4. Not breach or is otherwise compatible with EU obligations – including the SEA Directive of 2001/42/EC.

**WWW.MONTAGU-EVANS.CO.UK**

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Once the assessment is complete, the Examiner is required to recommend one of the following:

- The Plan can proceed to a Referendum
- The Plan with recommended modifications can proceed to a Referendum
- The Plan does not meet the legal requirements and cannot proceed to a Referendum

The Clients' submit this representation to assist the Examiner in assessing the GBNP against the 'Basic Conditions' and making a recommendation. They are made in the spirit of cooperation and it is our clients intention to work with the local community in order to successfully bring forward a significant allocation within the Neighbourhood Plans. The representations consider the entire GBNP against these Conditions, but primarily focus on Policy GB3 – Land at School Road to which the Clients' interests specifically relate.

This policy relates to the Clients' Site and states:

*"12.4 hectares of land at School Road, known as The Triangle and identified on the Policies Map, is allocated for the following development:*

- i) up to 150 dwellings including 15% bungalows and 30% affordable housing;*
- ii) community facilities that could include the uses identified in Policy GB7;*
- iii) at least 0.65 hectares of land for the expansion of the primary school; and*
- iv) recreational open space and children's play.*

*Development of the site should be undertaken in accordance with the Concept Diagram (Figure 12) and the Development Principles set out in this Plan and any future adopted development brief for the site as required by Policy RV18 of the Rural Vision 2031 Local Plan document.*

*Proposals should also enable the reduction of traffic speeds on Mill Road and the provision of safe crossing points on School Road, Mill Road and the A143 (The Street) to enable safe and sustainable travel to the wider public rights of way network and village facilities.*

*Housing proposals should provide a mix of sizes and types in accordance with the need identified in the Neighbourhood Plan unless clear and demonstrable evidence is provided to justify an alternative response that is supported by the local community.*

*The affordable housing provision should be designed so that it is 'tenure blind' (so that it is indistinguishable from open market housing), be distributed around the site and not concentrated in any one area.*

*Proposals that include an element of self-build housing will be supported."*

The next section outlines relevant policy and guidance, followed by an assessment of the policy wording as drafted against the basic conditions. The final section then proposes modifications to the current draft policy wording within the GBNP to ensure compliance with the basic conditions.

## COMPLIANCE WITH THE BASIC CONDITIONS

### National Planning Policy

The National Planning Policy Framework (the “NPPF” / “the Framework”) was published on 19 February 2019 and supersedes previous national planning guidance contained in various Planning Policy Guidance and Planning Policy Statements, as well as previous versions of the Framework, first published in 2012.

The Framework sets out the Government’s approach to planning matters, and is a material consideration of very significant weight in the consideration and determination of planning matters including Neighbourhood Plan preparation.

In March 2014, the Government published the National Planning Practice Guidance (NPPG) which is also a material consideration in relation to a variety of planning matters. The NPPG replaces a number of previous circulars and guidance to provide a simplified single source of guidance at the national level.

As noted above to meet the Basic Conditions test, the Plan must have “regard to national policy and advice”.

### Housing Capacity

Paragraph 29 of the Framework states:

*“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies”.*

Paragraph 044 (ref 41-044-20190509) of the Neighbourhood Plan Guidance states that where there is a conflict between a policy in a Neighbourhood Plan and a Policy in a Local Plan, section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.

Paragraph 103 (ref: 41-103-20190509) of the Neighbourhood Plan Guidance states that Neighbourhood Planning Bodies are encouraged to plan to meet their housing requirement, and where possible exceed it.

It is acknowledged that the GBNP does not need to repeat these national or local policies, but it does need to demonstrate they have been taken into account.

The Site, is allocated in the Council’s Local Plan Rural Vision Document (2014) under Policy RV16 for up to 40 dwellings in the period to 2031, where the capacity of the rest of the Site is to be determined through a site Development Brief.

GBNP Policy GB3 ‘caps’ residential development at 150 dwellings on site. Paragraph 6.12 of the GBNP acknowledges the absence of a Development Brief and that the GBNP provides a high level Concept Plan for the Site. The paragraph explicitly states the Concept Plan does not constitute the Development Brief required by Rural Vision Policy RV16

As a result of the Concept Plan, Paragraph 6.17 of the GBNP states that 150 homes reflects a developable area for house building on site equating to 7.5ha and a density of 20 units per ha, in line with densities across the village.

As currently drafted, the Policy does not accord with the Basic Conditions upon which the Examiner is required to assess the GBNP for the following reasons:

- Policy RV16 of the Council's Rural Vision Document notes that Great Barton is a Local Service Centre which is a term used to identify areas with a range of services and facilities to meet local needs. Great Barton is therefore considered a sustainable location to focus new housing growth. Paragraph 122 of the Framework states that planning policies and decisions should support development that makes efficient use of land.
- Local Plan Policy RV16 accords with Paragraph 122 by requiring a Development Brief to be produced to identify the sustainable development capacity of the Site. The Concept Plan within the GBNP provides a good high level 'starter-for-ten', but it is not of sufficient detail to test the development potential of the Site and therefore make sure a scheme is making efficient use of land. The suggested development capacity within GBNP Policy GB3 of 150 units at 20 dwellings per hectare is therefore not in accordance with national or local policy.
- A proposed 'cap' on development capacity enshrined in policy without a Development Brief would introduce a constraint that would undermine the requirement of Policy RV16 of the Local Plan Rural Vision Document for the production of a Development Brief and contradict paragraph 29 of the Framework which states Neighbourhood Plans should not "promote less development than set out in strategic policies within the Statutory Development Plan.

In the light of the above, the GBNP, as currently drafted, does not accord with the Basic Conditions, which requires a Neighbourhood Plan to have regard to national policy and guidance from the Secretary of State and be in general conformity with the strategic policy of the Development Plan for the area or any part of that area.

Consequently, the examiner is asked to consider whether an amendment to the wording of both Policy GB3 is required to ensure the development capacity on Site is robustly tested through the production of a Development Brief, in accordance with the Development Plan, and is not unduly constrained by the GBNP.

### Housing Type and Mix

GBNP Policy GB4 (Housing Mix) requires 15% of dwellings to be built as single storey bungalows on sites of 10 or more. This requirement is also reiterated within Policy GB3 relating to the Site. Policy GB3 also requires at least 60% of dwellings to have two or three bedrooms and 30% of the dwellings on site to be affordable.

As noted above, one of the overarching aims of the Framework is to make the efficient use of land in sustainable locations.

Paragraph 041 (ref 41-041-20140306) of the Neighbourhood Planning Guidance requires policies within a neighbourhood plan to be concise, precise and supported by appropriate evidence.

Paragraph 103 (ref 41-103-20190506) of the Neighbourhood Planning Guidance states:

*"Any neighbourhood plan policies on size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally produced information."*

Neighbourhood Planning Guidance (first published on 6 March 2014 and last updated at the time of writing on 13 May 2020) prepared by the Ministry of Housing, Communities and Local Government states at paragraph 006 (ref: 41-009020190509):



*“Although a draft neighbourhood plan is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up to date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development.”*

Prescribing a requirement for 15% single storey bungalows on sites of 10 dwellings or more, and explicitly relating this to the Site under Policy GB3 goes further than the policies within the Development Plan. The GBNP is supported by a Housing Need Assessment (April 2019) prepared by Aecom. Whilst it is acknowledged there will be a need for elderly accommodation, the report does not directly state that a proportion of 15% of new dwellings should be one storey bungalows, nor does it mention this requirement should be directly related to the Site. Such specific reference is considered unduly prescriptive and it should be for then market to determine the actual housing tenure and mix at the time a planning application is brought forward following production of the Development brief.

The Development Plan for West Suffolk Council is currently under review with a consultation on an Issues and Options Document (Regulation 18) proposed to commence in October 2020. The preparation of a new Local Plan will include an up to date evidence base and an assessment of housing need. To ensure the GBNP remains up to date for the Plan Period, it is not considered appropriate to fix housing type and mix, in case this does not accord with future demand.

In the light of the above, the requirement for 15% single storey bungalows and 60% two and three bedroom houses is not considered to meet the Basic Conditions, and therefore a revision to Policy GB3 and GB4 is requested to require an application to provide a mix of units and sizes to meet current objectively assessed need, in line with National Policy.

In relation to the requirement for 30% affordable housing on site, it is acknowledged that this accords with the percentage sought within the Local Plan. The Clients; will strive to meet this, but do not consider it necessary to reiterate local plan policy under the specific site allocation policy GB3. Nevertheless, if the Examiner is minded to keep reference to 30% provision, it is requested that the policy is modified to state “provision of 30% affordable housing, subject to viability” which would be consistent with the adopted Local Plan.

### Housing Design

Criterion iii of GBNP Policy GB5 (Housing Design) requires, where appropriate, a 40m back to back separation distance between dwellings. This requirement does not appear to be supported by an evidence base that justifies a departure from the typically accepted industry standard of 25m separation distances in location such as this.

The Clients; wish to highlight this to the Examiner and request draft policy GB5 be amended to remove reference to a minimum back to back separation distance of 40m to ensure the GBNP meets the Basic Conditions by complying with national policy and guidance, paragraph 041 (of the Neighbourhood Planning Guidance) of which require policies within a neighbourhood plan to be supported by appropriate evidence.

### Vehicular and Pedestrian Access

Rural Vision Policy RV18 requires the Development Brief to include access to the site from Mill Road and enhanced footpath and cycleway access to the village centre and areas of public open space.

Draft policy GB3 states that:

*“Development of the site should be undertaken in accordance with the Concept Diagram (Figure 12) and the Development Principles set out in this Plan”.*

The Development Principles are set out on page 34 of the Draft GBNP and under the sub-heading ‘Access and Movement’ it is stated that there shall be ‘a single vehicular access from Mill Road’. At the same time, the draft wording of policy GB3 states that:

*“Proposals should also enable the reduction of traffic speeds on Mill Road”.*

As noted in the Clients’ representations in February 2020, while it is appropriate to limit vehicular access into and out from the site to Mill Road only as per the requirements of Development Plan policy RV18, is not judged to be reasonable to seek to limit the number of vehicular access points to a single point. Such limitation could inhibit the ability for development of the site to make an efficient use of land (because the Highway Authority may require more than a single point of access for schemes of more than 150 dwellings). It may also contradict advice from emergency services who require two points of vehicular access on to a site in case one route is blocked.

In addition, artificially constraining the number of access points from Mill Road may fetter the ability of development to enable the reduction of traffic speeds on Mill Road – additional access points on Mill Road would increase opportunities for engineering interventions to reduce speed and increase the prospects of a successful Traffic Regulation Order to reduce the speed limit.

An assessment of the local highway network will be undertaken to inform the future Development Brief, which is required to be produced prior to an application for residential development on site being submitted. Access and egress should be assessed at that point, to ensure a suitable strategy is agreed. The Clients’ therefore request a modification to the wording on page 34 for the GBNP to remove reference to a single point of access from Mill Road.

## **REQUESTED MODIFICATIONS TO POLICY WORDING**

In summary, and in the light of the representations above, the Clients’ conclude a number of modifications are required to the policy wording to ensure the GBNP meets the Basic Conditions. The Clients’ suggest the following wording changes to assist the Examiner.

### **POLICY GB 2 – HOUSING DELIVERY**

#### **Existing Wording**

*“... this Plan provides for around 150 dwellings to be developed in the Neighbourhood Plan area between 2019 and 2041”.*

#### **Proposed Modifications**

*“...this Plan provides for ~~around~~ a minimum of 150 dwellings to be developed in the Neighbourhood Plan area between 2019 and 2041”.*

### **POLICY GB3 – LAND AT SCHOOL ROAD (THE TRIANGLE)**

#### **Existing wording**

*“12.4 hectares of land at School Road, known as The Triangle and identified on the Policies Map, is allocated for the following development:*

- i) up to 150 dwellings including 15% bungalows and 30% affordable housing;
- ii) community facilities that could include the uses identified in Policy GB7;
- iii) at least 0.65 hectares of land for the expansion of the primary school; and
- iv) recreational open space and children's play.

Development of the site should be undertaken in accordance with the Concept Diagram (Figure 12) and the Development Principles set out in this Plan and any future adopted development brief for the site as required by Policy RV18 of the Rural Vision 2031 Local Plan document.

Proposals should also enable the reduction of traffic speeds on Mill Road and the provision of safe crossing points on School Road, Mill Road and the A143 (The Street) to enable safe and sustainable travel to the wider public rights of way network and village facilities.

Housing proposals should provide a mix of sizes and types in accordance with the need identified in the Neighbourhood Plan unless clear and demonstrable evidence is provided to justify an alternative response that is supported by the local community.

The affordable housing provision should be designed so that it is 'tenure blind' (so that it is indistinguishable from open market housing), be distributed around the site and not concentrated in any one area.

Proposals that include an element of self-build housing will be supported."

## Proposed Modifications

"12.4 hectares of land at School Road, known as The Triangle and identified on the Policies Map, is allocated for the following development:

- i) ~~up to 150~~ Residential dwellings including ~~15%~~ bungalows and 30% affordable housing *subject to viability*;
- ii) community facilities that could include the uses identified in Policy GB7;
- iii) at least 0.65 hectares of land for the expansion of the primary school; and
- iv) recreational open space and children's play.

Development of the site should *have regard to* ~~be undertaken in accordance with~~ the Concept Diagram (Figure 12) and the Development Principles set out in this Plan and be *in accordance* with any future adopted development brief for the site as required by Policy RV18 of the Rural Vision 2031 Local Plan document.

Proposals should also *consider methods* ~~enable the reduction of~~ *to reduce* traffic speeds on Mill Road and the provision of safe crossing points on School Road, Mill Road and the A143 (The Street) to enable safe and sustainable travel to the wider public rights of way network and village facilities.

*Housing proposals should provide a mix of sizes and types in accordance with the most up to date evidence on objectively assessed need the need identified in the Neighbourhood Plan unless clear and demonstrable evidence is provide to justify an alternative response that is supported by the local community.*

*The affordable housing provision should be designed so that it is 'tenure blind' (so that it is indistinguishable from open market housing), be distributed around the site and not concentrated in any one area, unless there is support for an alternative layout from a Registered Affordable Housing Provider.*

*Proposals that include an element of self- build housing will be supported."*

## **POLICY GB4 – HOUSING MIX**

### Existing Wording

*"With the exception of the North East Bury St Edmunds Strategic Site, proposals for housing developments of 10 dwellings or more in the Neighbourhood Area should include provision for a mix of 60% of two and three bedroomed dwellings unless more up-to-date and publically available needs assessments demonstrate otherwise. At least 15% of dwellings on these sites shall be single storey bungalows unless the development is the conversion of an existing building".*

### Proposed Modifications

*"With the exception of the North East Bury St Edmunds Strategic Site, proposals for housing developments of 10 dwellings or more in the Neighbourhood Area should include provision for a mix of 60% of two and three bedroomed dwellings unless more up-to-date and publically available needs assessments demonstrate otherwise. At least 15% of dwellings on these sites shall be single storey bungalows unless the development is the conversion of an existing building".*

## **POLICY GB5 – HOUSING DESIGN**

### Existing Wording

*"...iii Where appropriate, have a minimum back to back separation distance of 40 metres with garden sizes that reflect the average of properties around it and the character area within which the site is located and as identified by data illustrated in Paragraph 9.21 of the Plan*

*... b) where appropriate, small clusters of affordable housing are distributed around the larger site".*

### Proposed Modifications

*"...iii Where appropriate, have a ~~minimum~~ back to back separation distance that minimises the perception of overlooking from existing and proposed dwellings; ~~of 40 metres with garden sizes reflects~~ the average of properties around it and, where appropriate, the character area within which the site is located ~~and~~ as identified by data illustrated in Paragraph 9.21 of the Plan.*

*... b) where appropriate, small clusters of affordable housing are distributed around the larger site, unless there is support for an alternative layout from a Registered Affordable Housing Provider."*

## POLICY GB12 – DEVELOPMENT DESIGN CONSIDERATIONS

### Existing Wording

“... 3 Reflect the local garden size characteristics”

### Proposed Modifications

“... 3 Reflect the local garden size characteristics *where appropriate*”.

## PAGE 34 OF THE GBNP – DEVELOPMENT PRINCIPLES

### Existing wording

“... At least 60% of dwellings to have two of three bedrooms;

... Maximum building height to be the equivalent of two storey dwellings;

... Densities to reflect local character and to be informed by desire to create new development within a high quality landscape;

... Affordable housing... to be distributed in small clusters, across the site; and

... A single vehicular access from Mill Road”.

### Proposed Modifications

“... At least 60% of dwellings to have two of three bedrooms *unless more up-to-date and publically available needs assessments demonstrate otherwise*;

... Maximum building height to be *identified through the production of a Development Brief* ~~the equivalent of two storey dwellings~~;

... Densities are to be *identified through the production of a Development Brief and should complement* ~~reflect~~ local character *and the* ~~and to be informed by~~ desire to create new development within a high quality landscape;

... Affordable housing... to be distributed in small clusters, across the site *unless there is support for an alternative layout from a Registered Affordable Housing Provider.*”

; and

... ~~A single~~ vehicular access from Mill Road”.

## CLOSING

We trust this representation is of use. In line with Local Plan Policy RV16 capacity, design and access analysis should be undertaken via the production of Development Brief, and not unduly constrained by policy beforehand. As currently drafted, the GBNP is not considered to meet the Basic Conditions. The proposed amendments to the policy wording outlined above make the policies, in the Clients’ view, acceptable and should allow the examiner to recommend the Plan proceeds to Referendum, subject to these modifications.



Yours faithfully,

**WILL EDMONDS**

**Partner**

**From:** [National Grid \(Avison Young - UK\)](#)  
**To:** [neighbourhood.planning](#)  
**Subject:** Great Barton Neighbourhood Plan Regulation 16 Consultation  
**Date:** 30 July 2020 14:15:23  
**Attachments:**

[30.07.20 West Suffolk C - Great Barton NP Reg 16 Jun-Aug 20.pdf](#)

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[THIS IS AN EXTERNAL EMAIL]

Dear Sir / Madam

We write to you with regards to the current consultation as detailed above in respect of our client, National Grid.

Please find attached our letter of representation. Please do not hesitate to contact me via [nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com) if you require any further information or clarification.

Kind regards

Chris Johnson

**Christopher Johnson MRTPI**

Planner

---

Avison Young  
Central Square South  
Newcastle, NE1 3AZ  
United Kingdom

[avisonyoung.co.uk](http://avisonyoung.co.uk)

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Our Ref: MV/15B901605

T: +44 (0)191 261 2361  
F: +44 (0)191 269 0076

30 July 2020

**avisonyoung.co.uk**

West Suffolk Council  
[neighbourhood.planning@westsuffolk.gov.uk](mailto:neighbourhood.planning@westsuffolk.gov.uk)  
via email only

Dear Sir / Madam

**Great Barton Neighbourhood Plan Regulation 16 Consultation  
June – August 2020  
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

**Response**

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

**Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.



To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

**Matt Verlander, Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

**Spencer Jefferies, Town Planner**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

**Matt Verlander MRTPI  
Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)  
For and on behalf of Avison Young

## Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

### Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

### How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: [plantprotection@nationalgrid.com](mailto:plantprotection@nationalgrid.com)

Cadent Plant Protection Team  
Block 1  
Brick Kiln Street  
Hinckley  
LE10 0NA  
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

---

**From:** SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>  
**Sent:** 17 June 2020 15:20  
**To:** neighbourhood.planning  
**Subject:** Great Barton Neighbourhood Plan consultation - Wednesday 10 June (9am) to Wednesday 19 August (5pm) 2020 - Response  
**Attachments:** 319026 NE Response.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

[THIS IS AN EXTERNAL EMAIL]

FAO Marie Smith

Please find Natural England's response in relation to the above mentioned consultation attached herewith.

Kind regards,

Ben Jones

Operations Delivery  
Consultations Team  
Natural England  
Hornbeam House  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

Email: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

**[www.gov.uk/natural-england](http://www.gov.uk/natural-england)**

- During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.
- Stay alert, control the virus, save lives.



Date: 17 June 2020  
Our ref: 319026  
Your ref: Great Barton Neighbourhood Plan



Marie Smith  
Strategic Planning Service Manager  
neighbourhood.planning@westsuffolk.gov.uk

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Ms Smith,

**Great Barton Neighbourhood Plan Regulation 16 consultation**

Thank you for your consultation on the above dated 09 June 2019

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this neighbourhood plan.**

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Ben Jones  
Consultations Team

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**From:** Crisell Chris (IESCCG) on behalf of planning.apps  
<planning.apps@suffolk.nhs.uk>  
**Sent:** 19 August 2020 11:44  
**To:** neighbourhood.planning  
**Cc:** TAYLOR, Jane (NHS NORTH EAST ESSEX CCG)  
**Subject:** CCG Great Barton NP response  
**Attachments:** G Barton NP Response Aug 20.pdf

[THIS IS AN EXTERNAL EMAIL]

Please find attached the response to the latest Great Barton Neighbourhood Plan on behalf of West Suffolk CCG.

Regards

### **CCG Estates Planning Support**

Ipswich & East Suffolk CCG & West Suffolk CCG  
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX  
[planning.apps@suffolk.nhs.uk](mailto:planning.apps@suffolk.nhs.uk)  
[www.westsuffolkccg.nhs.uk](http://www.westsuffolkccg.nhs.uk)  
[www.ipswichandeastsuffolkccg.nhs.uk](http://www.ipswichandeastsuffolkccg.nhs.uk)





integrated working



**West Suffolk**  
Clinical Commissioning Group

West Suffolk House  
Western Way  
Bury St Edmunds  
Suffolk IP33 3YU  
Tel: 01284 758010

[www.westsuffolkccg.nhs.uk](http://www.westsuffolkccg.nhs.uk)

06/08/2020

### **Great Barton Neighbourhood Plan**

Thank you for communicating with West Suffolk Clinical Commissioning Group (CCG) regarding the Great Barton Parish Council's Neighbourhood Plan (NP). As with the original draft the CCG is encouraged to see mention of healthy living, designing green spaces and community spaces for communities to grow, this is important in preventing physical and mental health issues. Since our response to the draft of the NP we have had the Covid-19 pandemic and this has brought about rapid changes in the way health care is delivered. The CCG is aware of the constraints placed on residents of Great Barton when trying to obtain primary care. However, C-19 has enabled the fast track of the universal adoption of video conferencing and comprehensive telephone triage which has delivered care into patients' homes, wherever they are. Work is being undertaken between all healthcare providers and the local council to look at how we can collaboratively work in providing healthcare in and around Bury St Edmunds of which Great Barton is included.

The Neighbourhood Plan provides for up to 150 dwellings in the parish but with the inclusion of 1250 dwellings proposed in Policy GB 2 work is required to look at healthcare provision in the area. The CCG along with our healthcare colleagues and West Suffolk Council are in the process of looking at strategic need in the area and Great Barton is very much part of that. Obviously Covid-19 has had an impact on healthcare and this has resulted in new strategies being looked at and old plans are now out of date and out of focus with new technologies and methodologies. Due to this, time is required to look at strategies going forward.

Section 3.11 the approved masterplan delivers the following. This section includes healthcare facilities as something that will be delivered. As mentioned earlier, healthcare strategies are currently being looked at, this means that although a healthcare facility in Great Barton might be seen as the best strategic location, it is not guaranteed. What we want to avoid is residents being under the impression that they are getting a healthcare facility when the reality is that a lot of work has to be done before anything is decided.

West Suffolk CCG is grateful for the inclusion of a statement in 8.7 in which Great Barton Parish Council confirms it "will support West Suffolk Clinical Commissioning Group in ensuring suitable and sustainable provision of primary healthcare services for the residents of Great Barton". This is really helpful as we would like to be as open and



integrated working

transparent with Great Barton Parish Council going forward and your support in moving into a post Covid-19 future will be gratefully received.

If you have any queries or require further information, please do not hesitate to contact me

Kindest Regards

**Chris Crisell**  
Estates Project Manager  
West Suffolk Clinical Commissioning Group

**From:** Natham Sheppard  
**To:** [neighbourhood.planning](#)  
**Subject:** Great Barton Neighbourhood Plan Consultation  
**Date:** 08 July 2020 12:06:51

---

[THIS IS AN EXTERNAL EMAIL]

I'd like to make the following comments regarding the draft Great Barton Neighbourhood Plan.

It is important to recognise the contribution that the Hall Park and The Park "Special Character Areas" make to the lives of many residents in the village, not only those living in Hall Park and The Park. These areas are used and enjoyed by many as recreational areas, for walking and relaxing. They contributed greatly to the overall character of the village and are what give it its distinct character.

It's therefore vital that any development in these areas protects and is subservient to the trees, ensures that properties and plot sizes continue to be large and that existing plots are neither over developed or split into smaller plots.

Kind regards  
Nathan Sheppard  
Great Barton



**From:** [Planning Central](#)  
**To:** [neighbourhood.planning](#)  
**Subject:** Great Barton Neighbourhood Plan consultation  
**Date:** 24 July 2020 09:26:25

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[THIS IS AN EXTERNAL EMAIL]

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework** (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy)

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

*(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)*

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Administration Team

E: [Planning.central@sportengland.org](mailto:Planning.central@sportengland.org)

**PLEASE NOTE, Sport England offices are now CLOSED. We currently have no access for the foreseeable future due to Covid 19.**

**Please send any planning applications/strategic consultations & planning general enquiries via email only to:**

**[Planning.central@sportengland.org](mailto:Planning.central@sportengland.org)**

**We will endeavor to respond within our usual timescales. We thank you for your patience.**

Sport England



This girl can



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Louise Hartley](#)

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---

**From:** Cameron Clow  
**Sent:** 18 August 2020 09:59  
**To:** neighbourhood.planning  
**Cc:** Georgia Teague  
**Subject:** SCC Response to Great Barton Neighbourhood Plan Reg. 16 consultation  
**Attachments:** FINAL SCC Response Great Barton R16.pdf

[THIS IS AN EXTERNAL EMAIL]

Hello,

Please see attached the county council response to the regulation 16 Great Barton Neighbourhood Plan. Please get in touch if there is anything in the response you would like to discuss.

Kind regards,  
Cameron

Cameron Clow  
Senior Planning and Growth Officer  
Growth, Highways and Infrastructure  
Suffolk County Council  
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

[www.suffolk.gov.uk](http://www.suffolk.gov.uk)

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<https://www.suffolk.gov.uk/about/privacy-notice/>

Date: 18<sup>th</sup> August 2020  
Enquiries to: Georgia Teague  
Tel: 01473 265054



West Suffolk Council  
West Suffolk House,  
Western Way,  
Bury St Edmunds  
IP33 3YU

Dear Ms. Howell,

### **Submission version of the Great Barton Neighbourhood Plan**

Thank you for consulting Suffolk County Council (SCC) on the Submission version of the Great Barton Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Where amendments to the plan are suggested added text will be in *italics* and deleted text will be in ~~strikethrough~~.

### Education

In the previous response provided at pre-submission consultation stage, SCC told the parish council that the primary school would have a deficit of 31 places with the level of growth planned at the Triangle. However, paragraph 2.16 of the neighbourhood plan can be updated to provide more up to date information regarding the capacity of the primary school:

“The County Council Education Department has indicated that the primary school is forecast to have spare capacity of ~~7~~ *nine* places by ~~2023/24~~ 2024/25. However, taking account of the proposal for 150 dwellings in Policy GB3 of this Neighbourhood Plan, it is expected there would be a deficit of ~~34~~ 47 places.”

SCC welcomes the policy provision in Policy GB3 to enable Great Barton primary school to expand in the future and thanks the parish council for including a specific land area following SCC comments. However, after further consideration and discussion with developers, in order to future-proof the primary school and prevent it from being landlocked, it is recommended that 1.1ha is safeguarded in Policy GB3, in case of future need for expansion to 420 places. The current allocation of 0.65ha in Policy GB3 part iii) would enable the school to expand to 315 places only, which would not enable the school to meet long term education needs.

The above amendments would ensure the neighbourhood plan meets Part A of the Basic Conditions, by following guidance of the NPPF paragraph 94, which states that great weight should be given to the needs to expand and create schools, and to have sufficient choices of school places to meet the needs of both new and existing communities, through the preparation of plans and applications decisions. It is important to “work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted” (paragraph 94 part b of the NPPF). Land area being a key issue the plan can resolve before the submission of a planning application, through policy.

In the Consultation Statement, the response from the Parish Council is that they expect the shortage of places to be met by Thurston. However, SCC wishes to clarify that the expansion of Thurston primary school is to provide places to children emanating from new development in Thurston. The additional pupils arising from growth in Great Barton will not be mitigated by the new school in Thurston.

SCC’s Strategy in the short term would be to provide places at the new primary school within the Cattishall development (The Severals), due to its proximity to the existing school. This could help to reduce out of catchment children at Great Barton Primary school, but it is still important that land is safeguarded at Great Barton to ensure that it is protected from being landlocked, if the future need for expansion arises.

Priority should be given to new pupils in the catchment areas for Great Barton Primary School and the new school as part of The Severals development, over new out-of-catchment pupils.

### Health and Wellbeing

The Great Barton Neighbourhood Plan states that “parish has a high proportion of older residents. In 2011 28% of the population was aged 65 or over, compared with 19% across the former St Edmundsbury area.” and describes the Part M of the building Regulations.

The Great Barton Neighbourhood Plan does state support for “Lifetime Homes” in Policy GB5 and paragraph 6.33. This is welcome, however not entirely correct – the Lifetime Homes standard has been replaced with Building Regulations Part M4 (2) -Accessible and adaptable dwellings.

Paragraph 6.31 does refer to the more up to date housing standards of Building Regulations Part M, which is welcome. Therefore, the removal of paragraph 6.33, and following amendment is recommended for Policy GB5 – Housing Design:

*“Proposals that deliver new residential development to Lifetime Homes standards for smaller 2 and 3 bedroomed homes that are adaptable (meaning built to optional M4(2) standards), in order to meet the needs of the aging population, without excluding the needs of the younger buyers and families, will be strongly supported.”*

SCC acknowledges that the Written Ministerial Statement 2015 states that a neighbourhood plans cannot set additional technical standards, however the previous recommendation of the county council was not to set a requirement for homes built to the M4(2) standard but simply support the inclusion of homes built to that standard within policy; it is recommended that the neighbourhood plan set out in policy their specific support towards proposals which contain homes built to those standards. This will help the plan meet the needs of a wider range of groups including older and vulnerable people, reflecting paragraph 61 of the NPPF (“...size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies...”), and meets Basic Condition part A and B.

This amendment would help the neighbourhood plan to follow guidance from footnote 46 in the NPPF: “Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.

### Transport

Policy GB12 Design Considerations currently states; “17. Produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that all vehicle parking is provided within the plot.”

Within the Consultation Statement, the neighbourhood planning group disagree with the County Council’s suggestion that development should provide a level of on-street parking, stating: “This is not supported as inconsiderate on-street parking on residential roads can cause significant obstructions, particularly to refuse and emergency services vehicles.”

The county council agrees with the issues that can be caused by on street parking and believes that the parish council have misunderstood the intent of SCC’s recommendation to include on-street parking. That some parking will take place on the street is inevitable. Therefore, having well-designed and integrated on-street parking can help to reduce inconsiderate parking, and avoid access issues for emergency services, refuse collections, and parking on pavements that hinder pedestrian access and safety. Please see pages 25-28 of Suffolk Guidance for Parking 2019<sup>1</sup> for further guidance.

Therefore, the following amendment is recommended to Policy GB12 part 17:

*“Produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that all appropriate vehicle parking is provided within the plot on site, where a proportion of parking is provided on street within a new development, but is well designed, located and integrated into the scheme to avoid obstruction to all highway users or impede visibility.”*

This supports the Basic Condition of sustainable development, as stated in the NPPF paragraph 8.2 “a social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment,...” (underline added for emphasis). It is also supported by paragraph 95 of the

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<sup>1</sup> <https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf>

NPPF to promote healthy and safe communities, which states: “Planning policies and decisions should promote public safety and take into account wider security and defence requirements...”.

### General

Maps are labelled incorrectly:

- There is no Map 6.
- The map on p47, which is currently incorrectly captioned as Map 9 “Village Centre Woodland”, is referred to as Map 7 in paragraph 9.3 discussing important views, however it should actually be captioned and referred to as Map 6.
- All maps following this are numbered and referenced within the supporting paragraphs incorrectly, e.g. Map 8 (Important Gaps) should actually be labelled as Map 7, Map 9 (Village Centre Woodland) should be Map 8, and so on.

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I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. Some of these issues may be addressed by the SCC’s Neighbourhood Planning Guidance, which contains information relating to County Council service areas and links to other potentially helpful resources.

The guidance can be accessed here: [Suffolk County Council Neighbourhood Planning Guidance](#).

If there is anything I have raised you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Georgia Teague  
Planning Officer  
Growth, Highways, and Infrastructure



**From:** [Water Hydrants](#)  
**To:** [neighbourhood.planning](#)  
**Cc:** [Dave Pedersen](#)  
**Subject:** FW: Great Barton Neighbourhood Plan consultation  
**Date:** 30 June 2020 08:57:15  
**Attachments:**

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[THIS IS AN EXTERNAL EMAIL]

**From:** Fire Business Support Team

**Sent:** 29 June 2020 16:17

Good morning

Can the following comments be put against the Neighbourhood Plan for Great Barton please. Suffolk Fire & Rescue Service has considered the plan and are of the opinion that, given the level of growth proposed, we do not envisage additional service provision will need to be made in order to mitigate the impact. However, this will be reconsidered if service conditions change. As always, SFRS would encourage the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but if incorporated into the design/build stage it is extremely cost effective and efficient. SFRS will not have any objection with regard access, as long as access is in accordance with building regulation guidance. We will of course wish to have included adequate water supplies for firefighting, specific information as to the number and location can be obtained from our water officer via the normal consultation process. Please do not hesitate to contact us should you require anything further.

Angela Kempen

Water officer

Suffolk Fire and Rescue Service

Public Health and Protection

Endeavour House

Russell Road

Ipswich

IP1 2BX

01473-260588

[Water.hydrants@suffolk.co.uk](mailto:Water.hydrants@suffolk.co.uk)

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**From:** Chris Thorneley  
**To:** [neighbourhood.planning](#)  
**Subject:** Re: Great Barton Neighbourhood Plan Consultation  
**Date:** 10 June 2020 17:05:52

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[THIS IS AN EXTERNAL EMAIL]

To Whom it may Concern,  
with reference to the document, page 36, Figure 12, Concept diagram, it appears that Mill Road will be the only access to the housing site, however, thereafter, it appears to be rather ambiguous, only stating footpaths and cycle paths.

Please can you advise on the road system within the site to each property. Our house resides right behind the site on the A143 and, therefore, this information would be appreciated. We do not feel that we are able to comment on the proposal without this essential information.

Yours faithfully,  
Dr and Mrs Thorneley

Our ref:  
Contact: Planning Policy  
Email: [planning.policy@westsuffolk.gov.uk](mailto:planning.policy@westsuffolk.gov.uk)  
Tel: 01284 757368

Date: 24 July 2020

Dear Sir/Madam,

## **West Suffolk Council's response to the Regulation 16 submission Great Barton Neighbourhood Plan consultation**

Please find below a response to the Submission Great Barton Neighbourhood Plan on behalf of the Local Planning Authority (LPA). The response was endorsed by Cabinet on 21 July 2020.

The comments have been provided to assist the examination of the plan focusing on the content and wording of the proposed policies and propose amendments or raise issues that we suggest will require consideration during the examination.

At the submission plan stage comments are invited regarding whether the 'plan proposal', fulfils the 'basic conditions', as required by Paragraph 8, Schedule 4B Town and Country Planning Act (as varied by s38C Planning and Compulsory Purchase Act 2004 as amended). These require that the plan:

1. Has regard to national policy and guidance from the Secretary of State;
2. Contributes to sustainable development;
3. Is in general conformity with the strategic policy of the development plan for the area or any part of that area;
4. Does not breach or is otherwise compatible with EU obligations – this includes the SEA Directive of 2001/42/EC; and that
5. The making of the Neighbourhood Plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species regulations 2010(d), either alone or in combination with other plans or projects.

As part of the formal submission of the Great Barton neighbourhood plan a Basic Conditions statement was submitted which is a statutory requirement in order to demonstrate that the basic conditions have been met. An analysis of the statement alongside the plan has been undertaken by officers and in respect of conditions 2, 4 and 5 above, the council is satisfied that they have been met.

However, some tensions have been identified between basic conditions 1 and 3 and the neighbourhood plan, but to avoid overlap and repetition these conditions are considered in conjunction below.

### **Regulation 14 pre-submission stage**

West Suffolk's strategic policies are identified in a document available on the council's website at

[https://www.westsuffolk.gov.uk/planning/Planning\\_Policies/upload/Strategic-Policies-for-the-purpose-of-Neighbourhood-Plans-2017-10-11.pdf](https://www.westsuffolk.gov.uk/planning/Planning_Policies/upload/Strategic-Policies-for-the-purpose-of-Neighbourhood-Plans-2017-10-11.pdf)

At the Regulation 14 pre-submission consultation stage on the Great Barton Neighbourhood plan, officers responded setting out some concerns about the wording of some of the draft policies in relation to the council's strategic policies. This response, along with an additional column setting out the neighbourhood plan group's response (transposed from the table of responses in the consultation statement) is attached at Annex A to this letter.

In responding to the regulation 14 pre-submission plan, officers suggested a meeting would be appropriate to discuss the points raised to find a way forward prior to the submission of the final plan. It was disappointing that this offer was not taken up by the neighbourhood group which goes against the expectation of collaborative working in the neighbourhood planning process. It should also be noted that only the minor points raised by the council were taken into account in the submission version plan, as evidenced in Annex A some comments remain either partially or not met.

Having reviewed the amendments made to the neighbourhood plan between the pre-submission and submission draft stages, it is felt that there remains some tension of varying degrees between national planning policy, the council's strategic planning policies and certain policies and paragraphs within the Great Barton neighbourhood plan. These tensions are identified below in order of perceived strategic importance;

- a) The NPPF, Core Strategy Policy CS11 (The Severals Strategic Site allocation), and neighbourhood plan policies GB5 and GB12
- b) The NPPF, Rural Vision 2031 Policy RV18 and neighbourhood plan policy GB3 School Road allocation
- c) The NPPF and neighbourhood plan Policy GB4 Housing mix

These areas are discussed in more detail below;

#### **a) The NPPF, Core Strategy Policy CS11 (The Severals Strategic Site allocation), and neighbourhood plan policies GB5 and GB12**

Before looking at the local issues, it is necessary to consider the national context set out in the National Planning Policy Framework (NPPF), the latest iteration of which is dated February 2019.

Paragraph 16 of the NPPF sets out a list of criteria against which plans should be prepared. It is considered that three of these points are of specific note in relation to the Great Baryon neighbourhood plan;

- b) which requires that plans are prepared positively, in a way that is aspirational but deliverable;
- d) which requires that policies are drafted clearly and unambiguously so that it is clear how a decision maker should react to proposals, and;
- f) where plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.

Paragraph 13 of the National Planning Policy Framework (NPPF) is also relevant to the council's response and states that *"...Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."*

Paragraph 29 of the NPPF goes on to state *"Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies."*

National Planning Practice Guidance (PPG) expands on this at paragraph 44, stating, *"The resulting draft neighbourhood plan must meet the basic conditions if it is to proceed. National planning policy states that it should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies (see paragraph 13 and paragraph 29 of the National Planning Policy Framework). Nor should it be used to constrain the delivery of a strategic site allocated for development in the local plan or spatial development strategy."*

If we turn now to consider the local issues, the Severals strategic site allocation is identified in the 2010 former St Edmundsbury area Core Strategy (Policy CS11) as delivering around 1250 homes and in the 2014 Bury St Edmunds Vision 2031 document (Policy BV6). While this site will form an urban extension to Bury St Edmunds, it falls within the Great Barton neighbourhood plan area and as such is referred to a number of times within the document.

An adopted concept plan for the Severals site is included within the Bury St Edmunds Vision 2031 Local Plan (2014) with a masterplan also adopted in 2014 as a Supplementary Planning Document (SPD).

A hybrid outline planning application for 1375 homes on the site, with full details for phase 1 and 291 dwellings, was submitted in December 2019 and is pending consideration.

As the strategic site falls within the neighbourhood area the application of each policy in the Great Barton submission neighbourhood plan will apply, unless otherwise stated.

Due to this fact, there arises a tension between two of the neighbourhood plan policies and the council's strategic policies as outlined below:

#### Neighbourhood plan Policy GB5 - Housing Design

Policy GB5 states at point ii that '*except within The Severals Strategic Site, (proposals should) not be in excess of 2 storeys.*' This therefore implies that all other parts of this policy do apply to the Severals site.

Point iii of the policy states that proposals should '*where appropriate, have a minimum back to back distance of 40m with garden sizes that reflect the average of properties around it and the character area within which the site is located and as identified by the data illustrated in Paragraph 9.21 of the Plan*'.

While the wording 'where appropriate' is acknowledged, requiring a 40m back to back separation is a prescriptive requirement with a lack of evidence to support it. The information at paragraph 9.21 does not explain how a distance of 40m was arrived at and why it would be an applicable distance. Imposing this restriction could constrain the viability and deliverability of the strategic site, and indeed any site that may come forward within the neighbourhood plan area, contrary to paragraphs 13, 16 and 29 of the NPPF and paragraph 44 of the PPG.

It should also be noted that no character area is identified for the Severals site, and that the information on garden sizes for the village at paragraph 9.21 is not applicable. This requires clarity in accordance with NPPF paragraph 16.

Policy GB5 goes on to state '*the layout of new housing developments must reflect the rural characteristics of the village*'.

The Severals strategic site is an urban extension to Bury St Edmunds with an adopted masterplan and it would not be applicable to consider the application against this policy requirement. This also requires clarity in accordance with NPPF paragraph 16.

It is considered that as drafted, the policy fails to meet basic condition 1 in respect of paragraphs 13, 16 and 29 of the NPPF, and basic condition 3 in respect of Core Strategy Policy CS11 and BV6. It is requested that the examiner considers appropriate amendments to the wording of Policy GB5 to exempt the Severals strategic site due to the potential impacts this could have on the flexibility, viability and deliverability of this important allocation which lies within the neighbourhood area.

It is also requested that the examiner considers the need and evidence for the requirement for a 40m back to back separation between dwellings in the context of *all* development in the neighbourhood area, as this could also affect the viability and deliverability of other smaller sites coming forward, including the allocation at GB3 Land at School Road.

## Neighbourhood plan Policy GB12 – Development Design Considerations

This policy applies to proposals for all new development including the Severals strategic site. While it is acknowledged that the policy states planning applications should demonstrate how they comply with a development design checklist and criteria 'as appropriate', there remain tensions in relation to the council's strategic site allocation at the Severals.

Criteria 3 of Policy GB12 states that planning applications should demonstrate how they reflect garden size characteristics. This is not applicable to the Severals site which is an urban extension allocation to Bury St Edmunds and does not relate spatially to gardens within the village area.

The garden size characteristics referred to at paragraph 9.21 only includes areas within the village and not the area covered by the strategic site. To overcome this tension, it is requested that the examiner considers the insertion of an additional line of text to criteria 3 of Policy GB12 as follows;

"With the exception of the North-East Bury St Edmunds Strategic Site reflect the local garden size characteristics..."

### **b) The NPPF, Rural Vision 2031 Policy RV18 and neighbourhood plan policy GB3 School Road allocation**

Land at School Road is allocated in the council's strategic Policy RV18 for up to 40 dwellings in the period to 2031, where the capacity of the site is to be determined through a site development brief.

A Development Brief provides a detailed framework for the development of a site where a full master-planning approach is not required. It is required on the School Road site as the RV18 Local Plan allocation allowed up to 40 dwellings on the site in the period to 2031, with the total capacity to be determined by the brief taking into account the land required for the expansion of the primary school, community uses, access requirements and landscaping.

Paragraph 6.12 of the neighbourhood plan acknowledges the current absence of a development brief and that the plan provides 'a high level concept statement' (figure 12) for the site which has been prepared as part of AECOM's support package, and guidance on how the site could be developed so that a more detailed development brief can be prepared 'should West Suffolk deem it necessary'.

However, the concept statement provides less detail than would be found in a development brief which puts into question whether the identification of up to 150 dwellings on the site, at a density of 20 dwellings per hectare with a requirement of 15% bungalows (GB4) and back to back separations between dwellings of 40m (GB5) can be justified as deliverable. (NPPF paragraph 16, point b).

Determining the site capacity through a development brief would allow full consideration of the other requirements of the site in terms of community uses, infrastructure and landscaping before making a decision on housing numbers, ensuring the site is deliverable in accordance with the policy requirements.

It is requested that the examiner considers 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. This would ensure general conformity with paragraph 16 of the NPPF and the strategic development plan policy RV18.

### **c) The NPPF and Policy GB4 Housing mix**

One of the overarching aims of the NPPF is to achieve an efficient use of land through the planning process and that sites are deliverable and viable. Paragraph 122 states that *"Planning policies and decisions should support development that makes efficient use of land, taking into account:*

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed, attractive and healthy places."*

Point b) of paragraph 16 of the NPPF requires that plans are prepared positively, in a way that is aspirational but deliverable.

Policy GB4 Housing Mix requires 15% of dwellings to be built as single storey bungalows on sites of 10 or more. While this would help support the growth of the aging population, there are concerns that apportioning such a figure would not be compliant with the NPPF in terms of an efficient use of land and deliverability and viability and is also not fully evidenced by the AECOM Great Barton Housing Needs Assessment (April 2019).

The AECOM assessment states that the people within Great Barton strongly support bungalows within the parish (page 10). The assessment goes on to acknowledge that the projected growth in older households will generate a demand for *"smaller detached or semi-detached properties, especially bungalows rather than flats, the stock of which is very low in the Neighbourhood Area."* However, page 49 of the assessment refers to the fact that there is no available data on the number of bungalows in the Parish. There is no information in the assessment to support that 15% of dwellings on developments of 10 or more should be bungalows.

This requirement would result in 23 bungalows (rounded up) being required on the School Road allocated site in policy GB3. In addition to the other site requirements of 30% affordable housing and a 40m back to back separation



distance between dwellings, the requirement for bungalows could cumulatively have a negative impact on the viability and deliverability of this particular site. On the basis of the above, it is requested that the examiner considers whether a policy amendment to GB4 is required.

In conclusion we remain available to having a telephone conference to discuss the points raised if you feel this would be helpful in moving the examination forward. If you have any queries about the council's comments, please do not hesitate to contact Ann-Marie Howell who is the principal planning policy contact for this neighbourhood plan.

Yours faithfully

Marie Smith  
Strategic Planning Service Manager

## Annex A

### West Suffolk Council officer comments on the Great Barton pre-submission neighbourhood plan and Great Barton neighbourhood planning group response

Page/Policy number	West Suffolk Council pre-submission comments (March 2020)	Great Barton neighbourhood planning group response (May 2020)
General comments	<p>Please note that references to the council should refer to 'West Suffolk' or 'the former St Edmundsbury' instead of 'St Edmundsbury'.</p> <p>The references to the Joint Development Management Policies Local Plan document (2015) within the text and policies are noted, but these may quickly become dated as the new West Suffolk Local Plan is progressed.</p>	<p>Noted. References will be amended.</p> <p>The Neighbourhood Plan will be examined against these policies and, given that West Suffolk Council has identified these as "strategic" they remain relevant to the Neighbourhood Plan.</p>
All policies	<p>The Local Plan Severals strategic site allocation, identified in the adopted former St Edmundsbury area Core Strategy and Bury St Edmunds Vision 2031 documents, falls within the Great Barton neighbourhood plan area. The references to this site are noted in various places within the pre-submission neighbourhood plan.</p> <p>The application of each policy in the pre-submission neighbourhood plan therefore applies to the</p>	<p>The policies in the Neighbourhood Plan have been reviewed following receipt of this comment and it is considered that the Plan has stipulated where the policies would not apply to The Severals strategic site and that the policies remain in conformity with the strategic policies of the Local Plan.</p>

	<p>Severals site, unless otherwise stated. An example of this is in Policy GB5 Housing Design, where it is stated in point ii that <i>'except within The Severals Strategic Site, (proposals should) not be in excess of 2 storeys.'</i> This implies that all other parts of this policy <u>do</u> apply to the Severals, including details on back to back separation distances between properties and where affordable housing should be situated within a site. This would clearly be in conflict with current planning policy and the adopted masterplan.</p> <p>It is therefore suggested that each policy is reviewed looking at the currently adopted wording allocating the Severals site in the council's local plans to ensure that they are compatible and avoid any conflict.</p> <p>One way this issue could be resolved is by inserting some words at the beginning of each policy exempting the Severals site from being included where this is applicable. It would be helpful to arrange a meeting with yourselves and your planning consultant to discuss how best to progress this at your earliest convenience prior to working up the submission draft plan.</p>	
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<p>Housing need</p>	<p>Where a neighbourhood plan chooses to address housing need it is necessary to identify the housing needs for the area during the plan period. The housing needs assessment undertaken by AECOM in April 2019 is noted, as is the fact that the current local plan allocation dwellings generate a 'de facto' housing needs figure of 1290 dwellings, as generating an alternative figure would fall significantly below this figure.</p> <p>The Planning Practice Guidance (PPG) on Neighbourhood Plans expects LPAs to provide a housing requirement figure for neighbourhood planning bodies. This is either determined through strategic policies or as an indicative figure. Where the LPA is not able to do this, the neighbourhood plan may use the neighbourhood planning toolkit for this purpose. The calculation of 150 dwellings for this neighbourhood plan does not follow either of these approaches so it is therefore important for the neighbourhood plan group to understand that their assessment of housing need will be subject to testing against the methodology set out in para 6.2 to 6.8 of the neighbourhood plan at the examination.</p>	<p>The comment acknowledges that generating a housing need figure in accordance with the spatial strategy and strategic policies of the adopted Local Plan would generate a smaller figure than is provided for in the Neighbourhood Plan.</p> <p>While it is acknowledged that the Planning Practice Guidance identifies methodologies for calculating a housing need for a neighbourhood plan, it does not expect the Local Planning Authority to provide one.</p> <p>The current adopted Local Plan provides for growth to 2031. A new Local Plan is to be prepared for the new West Suffolk area, but this is at a very early stage and consultation has yet to be undertaken on the Issues and Options. The latest published Local Development Scheme (January 2020) identified that this would have taken place in May 2020, but this has subsequently been postponed due to the COVID-19 situation.</p> <p>There is, therefore, no published housing requirement for West Suffolk as a whole or preferred strategy as to how the housing numbers</p>
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	<p>Should you and your planning consultant wish to discuss the housing numbers with the council, we would be willing to meet prior to you working up the submission draft plan.</p>	<p>will be distributed across the Local Planning Authority area. Until such a time as the new Local Plan reaches a more advanced stage, it is not considered that housing numbers from the Local Planning Authority can be relied upon.</p> <p>The current Local Plan makes provision for 1,290 new homes in the Neighbourhood Plan Area, but recognises that The Triangle site (Policy GB 3) has the capacity for additional dwellings but regard has to be had to the position of Great Barton in the Settlement Hierarchy in the current Core Strategy, is a Local Service Centre.</p> <p>Policy CS1 of the Core Strategy only identified 14% of the growth in St Edmundsbury between 2001 and 2031 would take place in the rural area outside Bury St Edmunds and Haverhill, with Local Service Centres only taking a part of that growth.</p> <p>Paragraph 4.56 of the Core Strategy states that 13 Local Service Centres are identified where "some small scale housing and employment development will be encouraged. As a general</p>
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		<p>guide, we consider that a limit of ten homes per development site would be appropriate, although more than one site might be identified in the village during the plan period. However, the scale of growth in the individual settlements will be dependent upon the local environmental and infrastructure capacity of the settlement concerned.</p> <p>Paragraph 9.16 of the subsequent Rural Vision 2031 Local Plan document notes that, "taking account of the higher rates of house-building since 2001, the number of new homes to be constructed in the rural area in the period 2012 to 2031 will be reduced to 13% of the borough total, or 1,490 homes, in order to conform with the Core Strategy."</p> <p>The Rural Vision 2031 document consequently allocates a site for 40 dwellings (The Triangle) for development between 2012 and 2031 (a 19 year timeframe). The Neighbourhood Plan provides for a further 110 dwellings for the extended 10 year plan period.</p> <p>This, together with the currently planned additional 125 dwellings at The Severals Strategic Site in the planning</p>
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		<p>application, means that the Neighbourhood Plan is, without any cause for doubt, meeting its housing requirement in accordance with the adopted Local Plan.</p> <p>An additional paragraph will be inserted in the Plan to explain that the background to the housing numbers provided for in the Neighbourhood Plan.</p>
Affordable housing	<p>We support the references seeking 30% affordable housing and small clusters of affordable homes. However, we would not wish to see the affordable dwellings clustered in concentrations of greater than fifteen dwellings, to ensure we help create a balanced and sustainable community, in accordance with the Council's Affordable Housing SPD Nov 2019.</p> <p>An issue we would like to see included is the tenure split for the affordable dwellings as defined by the Strategic Housing Market Assessment (SHMA). This may change as and when the SHMA is updated but the inclusion of a paragraph stating that the affordable housing tenure must be in accordance with the SHMA would avoid any misinterpretation that the affordable dwellings can</p>	<p>Noted.</p> <p>Given that West Suffolk Council has a recently adopted SPD for Affordable Housing, which is a material consideration in the consideration of planning applications, it is not considered necessary to include this additional material in the Neighbourhood Plan.</p>

	be delivered by any means. In the case of the former St Edmundsbury area, this would be 80% rented and 20% Intermediate Housing and should meet the definition of affordable housing within the NPPF.	
Para 3.12	West Suffolk updated its LDS timeline in January 2020 which suggests adoption February 2024.	Noted. Amend paragraph to bring it up to date.
Para 3.12 Vision Policy GB1 Para 5.3 Para 6.3 Para 6.6 Policy GB2 Para 11.1	West Suffolk's Local Plan end date has been amended to 2040 to align with neighbouring LPAs and it is suggested that this is reflected in the submission neighbourhood plan.	Given that the Local Plan revised end date was published after the Neighbourhood Plan commenced pre-submission consultation, it is considered that the Neighbourhood Plan should continue to plan to 2041 to reduce any confusion in the local community.
Para 5.5	It would be helpful to have a plan showing how the settlement boundary for the main part of the village has been changed.	The Plan does not change the settlement boundary of the main village. It is not considered that this historical information is necessary for inclusion in the Neighbourhood Plan and would only confuse readers. The Plan will be amended to reflect that changes have not been made to the main village Settlement Boundary.
Policy GB1 – Spatial Strategy	The wording would benefit from the insertion of the word 'village' between 'defined settlement boundaries' in GB1 for clarification.	Agree  Agree



	Suggest removal of the wording 'St Edmundsbury' in bullet b, as it is a West Suffolk joint plan.	
Para 5.8	Planning application DC/19/2456/HYB was submitted on The Severals site on 18 December 2019, which could be reflected in the next iteration of the plan.	The Plan will be amended to reflect this fact.
Policy GB2	<p>The policy refers to the strategic site known as Severals as meeting part of the growth needs but does not allocate the site. In order to be in general accordance with the local plan, where a neighbourhood plan seeks to address housing need, as in this case, it will need to identify the sites that meet that including the strategic sites.</p> <p>Policy GB2 states it will provide for around 150 dwellings through the neighbourhood plan to be developed across;</p> <p>i – the site allocation in Policy GB3,  ii – windfall and infill and;  iii – infill.</p> <p>This is inconsistent with policy GB3 which states around 150 will be provided on GB3 alone.</p> <p>Policy GB2 appears to plan for homes for the neighbourhood plan area based on the assessed capacity of site GB3 and</p>	It is not considered necessary to allocate The Severals site as this is already allocated in the strategic policies of the adopted Local Plan.

	not housing needs assessed through a recognised methodology.	
6.12 – small typo in third bullet	Should read – ‘Allocating a new post office’	Noted. This will be corrected
6.14 – small typo on fourth line	Should read - ‘number of houses’	Noted. This will be corrected
6.17	This paragraph states ‘ <i>a maximum site capacity of up to 150 homes at 20 dwellings per hectare.</i> ’ Local Plan Policy RV18, which has been identified as a strategic policy, states that the capacity of the site will be determined by a development brief for the site. Aside from the earlier comments on the appropriateness of the 150 dwelling housing requirement figure, it is not considered appropriate to set a maximum site capacity. It may be that the insertion of an indicative figure is appropriate, and it is suggested that a meeting is arranged to discuss a way forward.	It is noted that the adopted Local Plan sets a maximum of 40 dwellings for the site and, as such, it is considered that the Neighbourhood Plan, for reasons set out elsewhere, is fully justified in setting a maximum figure. The offer of a meeting is noted but not considered necessary given the representations submitted by West Suffolk Council as potential landowners.
GB3 Land at School Road	As above, the allocation states development will be for up to 150 dwellings. The Rural Vision 2031 states the total capacity of the site should be determined through the site’s Development Brief. In order to be consistent with policies in the local plan, it is therefore not considered appropriate to	Work undertaken in the preparation of the Neighbourhood Plan has had regard to the adopted local plans for the area. In particular, the list of “Local constraints and opportunities” listed in the Great Barton section of Rural Vision

	<p>set a maximum site capacity. It may be that the insertion of an indicative figure is appropriate, and we would be happy to meet to discuss a way forward.</p>	<p>2031. Part a of the section states:</p> <p>“a. Scale of growth will be dependent on local environmental and infrastructure capacity and will need to respect the character of the settlement.”</p> <p>Residents have identified that retaining the character of the village is of particular importance to them and this is reinforced by the comments received during the consultation on the draft Neighbourhood Plan.</p> <p>The developable area identified on Figure 12 – The Concept Diagram, amounts to approximately 7 hectares and results in a development density of approximately 21 dwellings per hectare, a density commensurate with the character of the village as noted in Rural Vision 2031 referred to above.</p>
GB3 – second para	<p>It is suggested that the words ‘and any future adopted development brief for the site’ is included to better reflect policy RV18.</p>	<p>Agree. Amend Policy GB 3 accordingly</p>
GB4	<p>The housing mix breakdown by dwelling sizes seems reasonable in respect of the evidence</p>	<p>Given that opportunities for sites in excess of 10 dwellings coming forward in the Neighbourhood</p>

	<p>provided. However, the council would prefer to consider the housing mix on a scheme by scheme basis and reflective of the current housing need.</p> <p>While the benchmark of 15% of dwellings to be built as bungalows would help support the growth of the aging population, we have concerns that apportioning such a figure would not be compliant with the NPPF and is not fully evidenced by the Great Barton Housing Needs Assessment (April 2019).</p> <p>If the decision is made to continue with the 15%, we assume that the figure would only be applied to sites classed as major developments (sites over 10 dwellings but excluding the Severals site) in accordance with the NPPF, an issue which would be useful to clarify in the policy or supporting text.</p>	<p>Area are limited, primarily to the sites allocated in the Local Plan, it is considered that the figures are appropriate. However, it is proposed to amend the policy to reflect that the requirement might change during the Plan period should new and robust evidence be published.</p> <p>The requirement is supported by needs identified by residents and also the character of the village in terms of the mix of dwelling types.</p> <p>The policy wording will be clarified.</p>
Page 68 Village Centre Inset Map	The demarcation of the strategic site boundary does not match that shown in the key.	The Village Centre Inset Map will be amended to address this error
page 69	Inset map of Barton Hamlet includes a settlement boundary (SB). Although some reference is made to settlement boundaries in	No response provided

	policies GB1 and GB2, it is suggested a specific policy for proposed settlement boundaries should be considered.	
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**From:** [Langley, Kim](#)  
**To:** [neighbourhood.planning](#) [Howell](#),  
**Cc:** [Ann-Marie](#); [Price, Lee](#) Great  
**Subject:** Barton Neighbourhood Plan 13  
**Date:** August 2020 12:08:42

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Good morning Ann-Marie,

Thank you for sending through Great Barton's Neighbourhood Plan. I thought the Neighbourhood Plan was very well written and had considered in depth both existing and future needs of the village.

I was pleased to see that they had recognised that the Strategic Site (Several's) should be excluded from any future housing need identified for the village, as this site is being brought forward in part, to help meet the Councils overall Objectively Assessed Need for housing.

With regards to the affordable housing provision I was pleased to see that they have recognised our current policies and aspirations in such:

- We required 30% affordable housing on site;
- We do not wish to see the affordable dwellings clustered in concentrations of greater than fifteen dwellings, to ensure we help create a balanced and sustainable community;
- They have acknowledged the Councils desire to implement the National Described Space Standards for all house types and referenced the need to bring this forward;
- They have considered 'housing design' and recognised the need that new homes need to have enough space to ensure sufficient storage can be integrated into the dwellings;
- To encourage the building of new homes that are future proof and adaptable to changing household needs. The encouragement to meet Part M4(2) and M4(3) as a minimum standard would help to achieve this. However we need to be mindful that this doesn't impact on the Councils Planning Obligation to secure 30% affordable housing on site;
- The housing mix breakdown by dwellings sizes seems on reflection of the evidence provided reasonable, however I would prefer to consider the housing mix on a scheme by scheme basis and reflective of the current housing need;
- To support the benchmark of 15% of dwellings to be built as bungalows would help support the growth of the aging population, as identified. I assume however that the 15% would be applied to sites classed as major developments in accordance with the NPPF. (Sites over 10 dwellings)
- The Concept Plan which demonstrates the deliverability of 150 new dwellings within the village seems reasonable in principle for the life of the Plan. It has considered the existing density of homes within the village and recommended 20dph, whereas a number of Local Service Centres are often set at 30dph. The Concept Plan has also taken in account local characteristics such as restricting the height of new dwellings to two-stories, ensuring homes would remain in keeping with the existing village. The Concept Plan has also allowed for additional growth to the school and although hasn't taken into account the impact of the Several's development in terms of Housing Need, it has recognised the need to address the impact it may have to, infrastructure and the integration to the existing village services.

Please let me know if you require any further information,

Regards

Kim Langley

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Kim Langley  
Housing Specialist Strategy & Enabling Officer  
Strategic Housing

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