STRADBROKE NEIGHBOURHOOD PLAN
REGULATION 14 REPRESENTATIONS & RESPONSES

R01

- **Name**
- **Email**
- **Subject** Village plan
- **Message** Surprise surprise the 2 plots in queen street are chosen is that because none of the parish council live at this end of the village.the traffic is already terrible this will only add to it.the inclusion of a school drop off point will not stop all the farm and Guv traffic.typical bias corrupt local politics , how much was the backhander from the various property developers will we ever know.

- **Sent on:** 20 January, 2018

R02

Continuing on from our previous communication I have read the report produced regarding the Neighborhood Plan on the Stradbroke web site. Firstly I would like to congratulate the people that have produced this report it is very detailed and covers many relevant issues for Stradbroke moving forward, so well done to all concerned.

I hope I have read this clearly that site 14 which is the Roger Skinner proposal was not deemed suitable for housing but would be considered for future development by his company.

I have enclosed proposed plans for the Skinner site plus two taken from a google extract showing the size of the developed land. I have also enclosed a similar size development in Diss to try and show how large this parcel of land is and what it could bring to this area.

My concern is very selfish one as our garden backs directly on to this development and I am clearly interested in how this will progress and who has a say in what if anything is built on this site. I am still not sure who has the final say in any development. Is it Mid Suffolk or your good selves? It seems a sin to be able to bypass all the good work that has been done to produce this report only to be given the green light by Mid Suffolk who are not as near to the local issues.

Once again great report well done to all concerned.

Regards

R02

Maps

Imagery ©2017 Google, Map data ©2017 Google 100 m

Measure distance
Total area: 72,963.61 m² (785,373.76 ft²)
Total distance: 1.25 km (4,111.49 ft)

Google Maps

Imagery ©2017 Google, Map data ©2017 Google 100 m

Measure distance
Total area: 72,602.56 m² (781,487.46 ft²)
Total distance: 1.29 km (4,222.23 ft)

L01

Many thanks for your very informative email regarding this.

Can you please add some clarification.

Is it the parish councils intention to propose a public footpath/cyclist route through the middle of our front garden continuing down our private driveway and then into Doctors Lane?

This would obviously divide our bungalow from our carport and outbuildings, which, I hope you will agree with us is unacceptable.

We look forward to your reply, thank you

Jenny and Philip Cleveland

R03

Good Day,

Please i have a question regarding potential development of land south of New Street.

On page 42 of the Stradbroke Neighbourhood Plan 2016-2036 the western boundary for the indicative concept plan lines up with the boundary ditch between Hillcrest and Green Oak on the north side of New Street

On page 50 the western boundary of area Strad 17 that also indicates potential development land south of New Street does not line up with the same boundary and in fact lines up withe the boundary between Timbers and Green Oak on the north side of New street.

I would like to know which is correct as one puts development directly in front of Green Oak and will change the outlook and the other does not.

I suspect that the concept plan on page 42 is just that…. a concept but it is important to me that I know accurately what the potential development area is being considered.

Kind regards

S01

SUFFOLK PRESERVATION SOCIETY
Respecting the past, shaping the future

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7 February 2018

The Clerk
Ms O Waldon
Stradbroke Parish Council,
Mill Hill House,
Church Lane,
Wickham Skeith
IP23 8NA

Dear Ms Waldon

Re: Stradbroke Neighbourhood Plan – Pre-Submission Consultation

I am writing on behalf of the Suffolk Preservation Society (SPS), the only countywide amenity society dedicated to protecting and promoting the special historic and landscape qualities of Suffolk. We also represent the Campaign for the Protection of Rural England in Suffolk and work closely with parish and town councils and other bodies who share our objectives. As Neighbourhood Plans offer the opportunity for protecting or improving the heritage and landscape character of an area, SPS are supportive of plans being drawn up in Suffolk, particularly where they are centred on historic settlements such as Stradbroke. Having read the draft plan we would like to make the following observations.

We congratulate the Neighbourhood Plan team on the excellent coverage of design principles (STRAD 1 and 2) and thoroughly endorse the efforts to raise the standard of new development in a way that safeguards and enhances the village's historic built environment. However, we would recommend that this policy includes requirement for development within or affecting the setting of the conservation area to adhere to the local design context as outlined in the 2010 Conservation Area Appraisal.

We consider that the wording of policy Design and Heritage (STRAD 11) could be strengthened to reflect the statutory weight that local planning authorities must give to the protection of designated heritage assets when determining planning applications. We note that the site allocations section of the document identifies at least three of the sites which are either adjacent to the conservation area boundary or affect the setting of a listed building (cf: Land east of Farriers Close, Land south of New Street, Land south of Mill Lane). The statutory duty to pay special regard to protecting listed buildings and their setting, and protecting and enhancing the character and appearance of conservation areas is enshrined in law and we recommend that the wording in STRAD 11 more closely reflects this.

We note that the Plan does not make reference to Locally Listed Buildings, otherwise known as Non-Designated Heritage Assets (NDHAs). These are unlisted buildings, features and monuments, both within and outside conservation areas, which have a degree of significance meriting consideration in planning decisions. The National Planning Policy Framework sets out the protection given to NDHAs (para. 135) when determining planning applications that affect them.

Neighbourhood Planning allows for the identification of non-designated heritage assets. Mid Suffolk District Council does not currently maintain a district-wide Local List and therefore the production of a Neighbourhood Plan provides an ideal opportunity to provide one. Historic England also advocates this approach and provides advice to local groups via its website, in particular its guidance note *Neighbourhood Planning and the Historic Environment*.

We would strongly encourage your team to consider compiling such a list which will strengthen protection from demolition or harmful development within the assets' setting which is otherwise limited, particularly outside the conservation area. The Society has recently been involved in two instances elsewhere in the county where the assessment of a building as a non-designated heritage asset has successfully prevented its demolition. We would therefore recommend that the Environment and Heritage chapter of the plan includes a policy which will protect non-designated heritage assets by requiring consideration of development that affects non-designated heritage assets to take into account the scale of any harm or loss and the significance of the heritage asset. A commitment to the compilation of a local list, in conjunction with Mid Suffolk District Council could, in turn be included in your list of community action projects to be carried out at a future date.

I attach a link to Suffolk Coastal District council's recently adopted criteria for your assistance which you may find helpful in this regard:

http://www.suffolkcoastal.gov.uk/yourdistrict/planning/designandconservation/non-designated-heritage-assets/

We would be happy to discuss with you any of the matters raised in this letter further, please do not hesitate to contact us.

Yours sincerely,

Fiona Cairns
BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC
Director

Cc: Mid Suffolk District Council Heritage Team

S02

Historic England

EAST OF ENGLAND OFFICE

Miss Odile Wladon
Stradbroke Parish Council
Mill Hill House
Church Lane
Wickham Skeith
Suffolk
IP23 8NA

Direct Dial: 01223 582746

Our ref: PL00285445

9 February 2018

Dear Miss Wladon

Thank you for consulting Historic England about your Pre-Submission (Regulation 14) Neighbourhood Plan for Stradbroke. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. We are therefore pleased to have the opportunity to comment on your neighbourhood plan at this stage.

In general, we welcome this comprehensive and detailed document, and are pleased to see that the historic environment is considered throughout, and particularly in relation to the proposed Site Allocations A-E, which will, if adopted, provide up to around 260 new dwellings in the parish. We welcome the commitment to high quality design and a mix of housing types as well as the principles of high quality urban design regarding settlement edges and pedestrian access, as well as the intention to ensure that the proposed developments respond to their historic and built environment context. We have the following comments to make:

Where the neighbourhood plan refers to 'heritage' we instead recommend that the term 'historic environment' is used, in line with the terminology used in national planning policy. It also reflects the holistic nature of the historic environment, which includes built, below ground and landscapes as well as nationally and locally designated heritage assets. We would also suggest that section 7 be titled 'Natural and Historic Environments', again in line with the terminology used in the NPPF.

It will be important that the strategy you put together for this area safeguards those elements which contribute to the significance of heritage assets within the neighbourhood area. This will ensure that they can be enjoyed by future generations of the area and make sure it is in line with national planning policy.

The government's National Planning Practice Guidance is also clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's

local plan into action but at a *neighbourhood* scale. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character.

In addition to considering designated heritage assets therefore, a Neighbourhood Plan is an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. This includes identifying any non-statutorily designated historic buildings, sites, views or places of importance to the local community, and setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. The plan could also include consideration of any Grade II listed buildings or locally-designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at their enhancement.

We welcome the commitment in policy STRAD1 for high quality design, but suggest a minor addition to the final bulletpoint so that it reads '...in order to retain the rural character and physical structure of Stradbroke, conserving and where possible enhancing its historic environment'.

We welcome policies STRAD2 and STRAD11, including the requirement for new development to use high quality materials and the retention of historic features. We suggest that the supporting text and policies could refer to the Stradbroke Conservation Area Appraisal, which provides more detailed discussion of the local character and materials, and which could therefore usefully inform new design in the conservation area. We also recommend that policy STRAD11 is entitled 'Historic Environment and Design'. We also note that the plan does not make mention of below ground archaeology considerations, and therefore suggest that this is included, in particular with suggests as to how the community might benefit from the results of any pre-development archaeological investigations within the parish. For instance, this could involve a policy requirement to disseminate the results locally through a series of talks, exhibitions or local publications.

We welcome the inclusion of policy STRAD4 regarding energy self sufficiency and efficiency. We would, however, recommend that reference is made to the fact that listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance, or harm their significance. Special considerations under Part L of the Regulations are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any guidance encouraging energy efficiency should note that the application of measures will therefore be different with respect to these classes of buildings and structures.

Further information can be found in the Historic England advice Energy Efficiency and Historic Buildings - Application of Part L of the Building Regulations to historically and traditionally constructed buildings, which is available to download here: <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl>.

The following general guidance also published by Historic England may also be useful to links to in the plan, to assist members the forum in managing change in the neighbourhood area once the plan

is Made:

HE Advice Note 2 - making changes to heritage assets: <https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>

HE Good Practice Advice in Planning 3 - the setting of heritage assets: <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>

HE Advice Note 3 - site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans>

HE Advice Note 7 - local listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>

We recommend the inclusion in your glossary of the relevant terminology regarding the historic envionment contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets enjoy.

Finally, we should like to stress that this advice is based on the information provided by Stradbroke Parish Council in your correspondence of 15 January 2018. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

Edward James

Historic Places Advisor, East of England

Edward.James@HistoricEngland.org.uk

R04

The Parish Council and all others involved are to be congratulated on a very comprehensive document covering many vital issues for the village.

My particular concern is about traffic and parking in Queen Street, which is where I live. The volume of traffic and the problems it can cause is referred to in several places in the Draft Plan, in particular paragraph 9)e) on page 38, which acknowledges that the proposed developments at Grove Farm and south of Mill Lane - a total of about 120 new households - "will put additional pressure on Queen Street" and states that "significant further growth requiring vehicular access onto Queen Street will be resisted". I think that Queen Street is already over loaded, and cannot cope with the additional pressure of the cars belonging to those new households. It is simply not wide enough and has limited visiblity in more than one place due to bends in the road. Further, I have noticed that once past the school, as the road becomes straighter, traffic tends to accelerate, so that by the time it reaches the points where the traffic from the new sites would be joining the road, it will often already be exceeding the 30mph limit.

I am all in favour of a car park for the school, as is proposed. This would help ease congestion and make the road safer at school drop off and pick up times, but I don't think it will be enough. There is a need for a larger car park which is clearly available for all to use, and which would balance the car park at the community centre the other side of the village. It could be located nearer to the Queen Street exit from the new development site, not tucked away as shown on the plan for Site D but still adjacent to the school premises, so that it would be more noticeable and people would use it, and not be tempted to carry on parking in Queen Street anyway for convenience.

I do see from the plan for Site D that there seems to be a proposal to introduce a parking restriction in Queen Street, indicated by a pink arrow on the plan, though I can't see any reference to this in the text. This would make a larger and easily accessible car park all the more necessary since some Queen Street residents do not have sufficient off-road parking for their visitors, who would no longer be able to park in the street.

If the principle of parking restrictions in the village was established, could this be extended to the junction with Queen Street and New Street, where parking near the crossroads is a serious visibility hazard?

The Mill Lane development itself will of course add to traffic disruption and congestion while it is going on, as well as disturbance and general nuisance to those living close to it, probably for quite a long period of time. I have to say that traffic in front of my house and a building site behind it is not something I look forward to very much!

Regards

R05

- **Message Details:**
  -
  - **Name**
  - **Email**
  - **Subject** Neighbourhood Plan Response
  - **Message** I think this is a good and cohesive document and strategy, underpinned as it is by the need for sustainable development in the village. I think all the sites and policies for those sites detailed in the document are appropriate for the village, and essential to maintain the sense of place which the document mentions, and which most of those living in the village feel. It's great to finally see something tangible which will hopefully have a lasting beneficial effect on Stradbroke.

R06

- **Message Details:**
  -
  - **Name**
  - **Email**
  - **Subject** Neighbourhood Plan Response
  - **Message** Having read the Neighbourhood Plan I am disappointed that in the 'Investment Priorities' there appears to be no leisure provision for Primary/High School pupils. I believe that in the initial survey it was identified that young people requested a Skate Park. Although I do not have any children of this age, I do have Grandchildren who gain a lot of pleasure from such an activity (basing my experiences on such a scooter/skate park in Sheffield and the disappointment that we only have a running track to scooter around). Perhaps funding this time could be directed towards such a project, particularly as we are trying to address Anti-Social Behaviour, instead of the Courthouse and Library which has in recent years been successfully refurbished. I appreciate that these areas can be noisy but sometimes you have to accept noise when children are enjoying themselves and I would not object to one on the land south of New Street
- **Sent on:** 16 February, 2018

R07

Transcript of R07:

As owners of a Grade II listed property within the conservation area of Queen St, we would like to raise the following points regarding the proposed development site (STRAD18) for 75 houses on the land adjacent to Mill Lane:

a) In which order are the sites likely to be developed and is there a time frame for development STRAD 18.

b) Pro-rata the density of proposed houses on STRAD18 seems to be far in excess of the other sites.

c) Define what is meant by protecting and enhancing the conservation area and listed buildings given that on the plan there seems to be no buffer zone are between the start of the development and the conservation area boundary ie: the rear of the existing properties. Will this "enhancement" be carried out prior to the start of the building works.

d) The consultation acknowledges that there is already a problem with surface water drainage in Queen St, would it not be possible to resolve this problem prior to the development starting.

e) During the 13 years we have owned our property we have become increasingly disturbed by the increase of traffic along Queen St. The introduction of developments STRAD18 & 19 will surely only compound the problem. The proposal will now mean we will suffer traffic noise and pollution to the front and rear of the property.

f) Reference is made within the plan to the existing open and rural feel of the village and indeed one of the attractions of our property is the far reaching views across open farmland which will be lost if STRAD18 goes ahead. Given that the development borders the conservation area, it seems to have more impact on neighbouring properties than the other proposed sites.

g) Define the meaning of restricted parking in Queen St, and what effect this will have on the residents ie: visitors, trades people etc.

h) With regard to the existing preschool/nursery building, the description of it being dilapidated seems rather extreme. Surely money could be saved by refurbishing this building to bring it up to a useable standard, rather than demolishing it for a car park when provision for parking has already been included in the development plan.

i) As the rear of the properties in Queen St are presently not overlooked, what measures will be put in place to ensure privacy and security for the existing residents of those properties.

19th February, 2018.

R08

Mid-Suffolk Council Planning - Stradbroke

Neighbourhood Plan. 2016-2036

We have looked at the draft version of the Neighbourhood Plan, and have some comments.

Firstly, it does not show on any maps we have seen of Maple Close, on this land are 3 footings already in place, by Steve Lee (Builder) for 3 more houses. Also he has purchased another plot of land which is a rear part of the garden of Westland House. All of the site vehicles and deliveries for this development will come via Meadow Way. Plus one other house which has been agreed by Stradbroke Parish Council on the existing vacant plot of land next to Jubilee House, on the corner of Maple Close and Meadow Way.

3.7 Site NP6 - Land North of Meadow Way.

The Vehicular Access to this site via Meadow Way is very narrow, and not wide enough for passing vehicles, which will cause bottle necks for emergency vehicles.
Therefore all construction traffic will only be able to access the sites via Meadow Way, Is this legally allowed? this will take years to build, causing major disruption around Meadow Way, not to mention the safety aspect, with so many heavy vehicles accessing the site. We have quite a few children living in Meadow Way. Laurel House will be on the junction of all these future developments. This will cause much stress and aggravation to the residents.

We understand the owners of Site NP6 Land North of Meadow Way had only wanted 6 houses built. This is more acceptable re: safety aspect for everyone concerned.

Paragraph re: vegetation removal/maintenance in Meadow Way could you please clarify what this will entail?

3.6 Site NP5 - Land at Meadow Way and Cottage Farm.

We understand the only way through to this site is via Meadow Way/New Street
This is totally unacceptable re volume of vehicles needed to build this site, and the dangers that it could entail for existing residents.
Also when completed the dangers for all residents.

We know that part of Meadow Way and New Street is in the Conservation Area, this must also be considered.

We also understand that the existing ransom strip is only wide enough for a single lane road. Your 3.6 Site NP5 states Suffolk Design Guide would put in footpaths, certainly there would not be enough width at this ransom strip, on to the site for any contractors lorries, vans, and emergency vehicles.

We are at present a small cul de sac, if these developments go ahead, we will have Maple Close, plus two looped roads coming in and out of Meadow Way, causing congestion and many safety issues involving young children and adults. Also we feel that parking will be a major issue.

The potential to link NP7 with NP5 via an emergency access/footway link this could be alright for non motorised users, or end up being a rat-run through the site, if not monitored correctly.

R09

As per our telephone conversation, please find my questions/concerns arising from the above plan.

I appreciate that maybe not all questions can be answered at this time but any answers/replies will be welcomed.

Many thanks,

NEIGHBOURHOOD PLAN 2018
STRAD2

- who will ensure that the design principles are adhered to?
- bullet point starting 'respecting established' ... sorry don't understand
- what comprises a landscape buffer?
- 5mtr buffer required for open countryside borders, what about for existing dwelling/property borders?

STRAD3

- are 1 bed properties really needed in Stradbroke?

STRAD4

- who vets the developers proposals for alleviating some potentially major problems with both drainage and electricity supply?

General (on above)

- who will ensure that the overall requirements stated within the plan are met?

STRAD18
Flooding

- during heavy rainfall the surrounding brooks/ditches/swales fill and overflow
- the field itself is permanently waterlogged during wet months

Proximity to existing dwellings

- will the new rear gardens be adjacent to perimeter boundary?
- what will be the minimum distance between existing and new properties?
- will there be any privacy planting?

Noise pollution

- a number of home offices face the proposed site
- what will be put in place to minimise noise levels during working hours?
- What will be put in place to minimise on-going noise levels?

Privacy

- currently first floor bedrooms and offices overlook open fields, during building works they will overlook a building site and on completion will overlook housing estate

- what specifics will STRAD2 provide to minimise this loss of privacy?

Traffic

- how will you ensure that parents (some) do not continue to drop their school children off in Queen Street?

Suggestion

- to run a footpath around the boundary between existing and new properties to allow dog walkers and ramblers access to existing footpaths

Building works

- what are the potential timescales, duration and hours of work?
- will early morning and weekend working be allowed?
- how will the site be secured?

Compensation

- will financial compensation be considered for devaluation of existing properties, viz-
    - outlook?
    - air pollution?
    - noise pollution?
    - light pollution?
    - loss of privacy?

R10

- **Message Details:**
  -
    - **Name**
    - **Email**
    - **Subject** SNP Draft Plan
    - **Message** I would like to say that out of the sites that were put forward, i think the four that have been picked are the best sites to deliver Stradbrokes housing needs and would have my support. They are evenly spread out and maintain the character of the village. I also like that they offer expansion to the two schools and playing field. My two concerns however are with the land south of Mill Lane. I totally get why this land has been included as it is the only site that offers expansion to the Primary School. But i wonder if houses are built there will people want to live between a school and a dog food factory? Also where the roadway exits onto Queen Street. Won't that be near the entrance to the Grove Farm development thus making a dangerous crossroads? I think this needs to be considered. The other point i would like to make and i think this is REALLY IMPORTANT going towards a referendum is that i think this plan is good for the village and i hope it goes through. However i think the flyers you put through everyone's doors recently is a good idea but you need to make things clearer! Why do i say this? Well although i understand the process and have read all the paperwork, i think a lot of people won't do this because they are too busy. They will look at this and think by voting for the SNP they are voting for up to 222 new homes to be built. If they are against new homes they will vote against it. But what they might not realise is these homes will be built anyway but the SNP is the best way to go for the village. I really think you need to consider the above point as it is REALLY IMPORTANT and make this clear to people, otherwise all the hard work you have put in could be wasted if people don't vote for the SNP when it comes to the referendum. Many Thanks
- **Sent on:** 23 February, 2018

R11

- **Message Details:**
  -
    - **Name**
    - **Email**
    - **Subject** POLICY STRAD18: LAND SOUTH OF MILL LANE
    - **Message** Although the preamble to 'Site D: Land south of Mill Lane' states that 'vehicular access would be onto Mill Lane', the attached map shows at the southern boundary of the development a symbol which although not colour matched is presumably the one listed to mean 'agreement with private landowner required for new vehicular access'. If this is not a mapping error and there is also to be proposed vehicular access at the southern boundary of Site D the map should show comprehensively how this would connect with New Street. The map legend is incomplete and ambiguous in this case. I wrote the email below on 3/11/17 to the Parish Clerk after the initial consultation last year explaining why I think that a skatepark carefully situated would be a valuable asset to the growing village. I have since discussed it with her having not received a reply and she told that it had recently been discussed positively by the PC but too late for it to be included in the printed pre-submission document. I had hoped it might have be included digitally in the version online but I see not. However I trust it will be taken forward in the final submission as I see there is significant interest for one recorded in the Analysis of responses to Youth Questionnaire 2016. Dear Councillors I forgot to include this in my response to the recent public consultation. Presumably there are reasonable grounds to ask developers to provide a social good in return for the house-building profits they stand to gain from that particular site. I assume this would apply in the proposal to include access to a safe parking area off Queen Street for primary school parents to use. I know that teenagers feel there is little for them in the village and want somewhere to meet their friends and hang out. My suggestion is that good use could be made of a properly designed concrete skatepark with shelters to sit in by what is inevitably going to be a growing teenage population. I understand a good skatepark is lacking in this area. There are bmx bikers and skateboarders in the village and always will be now. It is healthy physical activity and in fresh air. My son is 30 and skates to this day. He began skateboarding when he was 9 so I visited a lot of parks with him as he grew up. My experience has been that behaviour is mostly very good, invariably good-humoured, friendly and helpful, particularly to beginners and younger users, and a great deal of concentration and energy is spent on learning new tricks. My son has met people at parks in this country and abroad who remain his friends. I hope this is helpful. Yours faithfully
- **Sent on:** 24 February, 2018

R12

RE STRADBROKE NEIGHBOURHOOD PLAN 2016 - 2036,
FOOTPATH TO NEW STREET, DRAWINGS SITES OPTIONS B&C

[redacted]

NEW STREET
STRADBROKE
SUFFOLK
[redacted]

THE CLERK
STRADBROKE PARISH COUNCIL
MILL HOUSE
CHURCH LANE
WICKHAM SKEITH
IP23 8NA

THE CLERK

THE SUGGESTED FOOTPATH HIGHLIGHTED ON ENCLOSED DRAWING TO NEW STREET, IS OWED BY MOORHENS PROPERTY. THIS IN TURN ALLOWS VEHICLE ACCESS TO MOORHENS HOUSE AND GARAGE, IF THIS IS DESIGNATED AS A FOOTPATH, THE FOLLOWING QUESTIONS ARISE

1 ACCESS DENIED TO OTHER VEHICLES ONLY AS A FOOTPATH
2 CHANCE OF INCIDENT BETWEEN VEHICLES, PEDESTRIANS, OR CYCLISTS

ALSO BY WHAT LAW CAN PARISH COUNCIL AND HIGHWAY USE LAND OWED BY THE PROPERTY OF MOORHENS AS A PUBLIC THROUGHWAY, AT THIS MOMENT IN TIME IT IS ACCESS TO FOUR HOUSES ONLY, AND NOT A THROUGHWAY.

REGARDING TO BUILDING OF HOUSES ON SITE FIVE WHICH ACCESS ROAD WILL BE USED, TO TRANSPORT MATERIALS TO SITE?, THE HIGHLIGHTED LANE ON SITE FIVE DRAWINGS, DOES NOT SEEM VIABLE FOR HEAVY TRAFFIC.

YOURS SINCERELY.

[redacted]

Site d
Site e
Meadow Way
B1117 New Street
ion C concept plan

Land Registry
Official copy of title plan

Title number SK265289
Ordnance Survey map reference TM2273NE
Scale 1:1250
Administrative area SUFFOLK: MID SUFFOLK

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This official copy is incomplete without the preceding notes page.

Land Registry
Official copy of title plan

Title number **SK311049**
Ordnance Survey map reference **TM2273NE**
Scale **1:1250** enlarged from 1:2500
Administrative area **Suffolk: Mid Suffolk**

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This official copy issued on 5 January 2009 shows the state of this title plan on 5 January 2009 at 11:13:50. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002).
This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. See Land Registry Public Guide 19 - Title Plans and Boundaries.
This title is dealt with by Land Registry, Kingston upon Hull Office.

S03

Dear Sir/Madam,

Thank you for the opportunity to comment on the Stradbroke 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 e-mail.

POLICY STRAD1: DEVELOPMENT STRATEGY AND PRINCIPLES

Anglian Water is supportive of Policy STRAD1 as it states that development on the site identified in the Neighbourhood Plan will be expected to address the provision of utilities infrastructure including that provided by Anglian Water.

POLICY STRAD4: UTILITIES PROVISION

Anglian Water is responsible for managing the risk of flooding from new development only where it is proposed to connect to the existing sewerage network. Suffolk County Council has lead responsibility for managing the risk from surface water flooding.

Therefore it is suggested that the title of Policy STRSD4 be amended to include reference to surface water management.

As outlined in the Government's national planning practice guidance is to discharge surface run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.

It is therefore proposed that the first paragraph of Policy STRAD4 be amended as follows:

- For ~~the~~ **surface water** drainage ~~network~~, this means demonstrating that all reasonable and sustainable options have been considered **in accordance with the surface water hierarchy**.

Reference is made to a scheme for the long term management of utilities infrastructure. The principal concern appears to be the long term management of surface water management and passing the responsibility to the Parish Council or new residents as outlined in the supporting text for this policy.

In the case of foul sewerage network there is an established process for applicants to apply to Anglian Water under the provisions of the Water Industry Act 1991 to adopt new sewers which are provided as part of the development.

Further details of this process are available to view at the following address:

http://www.anglianwater.co.uk/developers/adoption-of-a-new-or-existing-sewer.aspx

It is therefore proposed that the second paragraph of Policy STRAD4 be amended as follows:

'Such solutions should be accompanied by an appropriate scheme of management which ensures the effective long term management of the~~utilities infrastructure~~ **surface water drainage system**'

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

Regards,
Stewart Patience
Spatial Planning Manager

Anglian Water Services Limited
Mobile: 07764989051
Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT
www.anglianwater.co.uk

S04

Date: 27 February 2018
Our ref: 236421

Stradbrooke Parish Council
Mill Hill House
Church Lane
Wickham Sketh
Suffolk
IP23 8NA

BY EMAIL ONLY

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

T 0300 060 3900

Dear Sir/Madam

STRADBROKE NEIGHBOURHOOD PLAN

Thank you for your consultation on the above dated 18 January 2018.

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 draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully
Dawn Kinrade
Consultations Team

R13

Response to Pre-submission Consultation Document
Feb 2018

1. Forward. 'Community-wide responses.....Policies are there to deliver the community's ambitions'

The 1st survey was rigorous, anonymous and incorruptible as each respondent had a unique code so it could only be completed once. The NP committee at the time worked with CAS to develop this secure survey that, as a result, was efficient, effective and accurate. Each household was given a copy personally by one of the team of volunteers who helped householders where needed and collected the survey if there was a difficulty in returning it. Prior to the survey there was blanket coverage and publicity including articles, posters and a large banner above the Spar shop.
The 2nd survey was virtually non-existent. The vast majority of residents did not know it was taking place until too late. There was scant publicity and respondents had to be pro-active. A substantial number of elderly residents do not have access to the internet and would not be willing or able to make a special effort to go to the library where they would have to go through all the documents and complete a paper copy. We made a particular point of home visits for those people in conducting the first survey. Their voice has now been ignored.
2 posters only appeared in the village on the day of the deadline so not seen by residents. One resident wrote a full response to the consultation process suggesting at the time that it was rushed and not open to all. The reply from the NP committee was that they were 'adhering to deadlines set by MSDC' which is not accurate.
The 2nd survey was conducted on SurveyMonkey that is open to corruption and was proved to be so by some people testing the system. It was very easy to enter multiple entries with no security checks. As such, any results are null and void as a large number are fictitious.
However, no evidence from this survey appears to be available yet policies and site allocations have been written in this document. This suggests that the NP committee have made decisions about the sites rather than residents and have hoped that it matches general opinion. This goes against the aim of an NP and the sentence quoted above. The NP committee need to be reminded that they are merely an objective conduit of information that is true and accurate and not at liberty to manufacture policies. It appears that Policy Strad1: Development Strategy and Principles is dubious in its content as it is not based on full and accurate evidence but the opinion of a few.
At the very least this survey needs to be repeated using a secure system after full publicity and access to it followed by open and clear evidence.

2. The Village Design Statement. 'If there is further expansion.....very effective and influential linear form is retained.' (2003)

This document is now 15 years old and the research behind even older and contains some subjective views. It has not been tested by reference to the resident opinion/consultation in the preparation of this document. It is stated that the VDS was up-dated and approved in 2014 but by whom? This was not shared with the village nor does it appear on the MSDC website (unlike Eye's, for example). Again, if it is to be used as evidence, this needs to go to consultation with all residents and then shared with MSDC.

3. Policy Strad1: Development Strategy and Principles

Where is the evidence that the 5 sites allocated are the genuine sites? Some of these are in direct conflict with the original village responses in the first survey/questionnaire and have not been flagged up as high priority sites by AECOM eg Land North of Laxfield Road. Others have been dismissed not because of major problems highlighted by AECOM but by a decision made by the current NP committee without solid backing from the village or a clear rationale.

With such important decisions to be made it is vital that Stradbroke residents are given as much information/guidance as possible. An effective way would be in the form of scenarios highlighting pros and cons of all the sites indicating all the extras that the village would gain from each eg Site 5 is partially a brown field site that has its advantages and would open up a series of pathways especially if linked to the back of the primary school....and so on. None of these scenarios were put forward to allow residents to think creatively and widely and with a full set of options
There is particular concern as a member of the current NP committee/Parish Councillor has contacted 2 of the landowners in this list of 5. He tried to persuade one to develop his land to build 45 houses instead of the 9 that he is asking planning permission for. He tried to persuade another landowner that if he agreed to certain terms matching the suggestion in the NP for site 2 then permission for houses would be easily and readily granted. This is clearly unacceptable and manipulating practice again not adhering to the principles and remit of a Neighbourhood Plan.

4. Infrastructure
The 1st survey allowed for feedback from households and businesses on broadband and mobile reception. There was a strong bank of response that has been ignored here yet it was a priority for many.

5. Education
Stradbroke High School (SHS) is one of the smallest high schools in Suffolk with fewer than 250 students. It is not fully utilising all its property and substantial playing fields and has ample opportunity to expand without devoting a parcel of land to it. No evidence is being provided that educational experts have demanded this nor has this been reflected by any evidence from opinion gathering from Stradbroke residents. It simply appears as an emotive and manipulative move to prevent development on a particular site.

5. Other Community Provision
It is suggested that 1 'approved' site would allow for expansion of the Community Playing Fields 'to provide .....informal recreation such as dog walkers.' There is a strict rule about no dogs on the Playing/Sports field so where did this idea emerge from? However, another proposed site offers many further opportunities for recreational activities such as circular paths leading to a network of paths around the village for everyone plus a large fishing lake and wildlife observation look-outs yet this has been ignored. Again there is no evidence of residents' response to these sites so we are unable to judge whether this is simply the NP committee's view.

6. Transport and Accessibility
'There has been growing concern.....unadopted roads.' Where is the evidence for this? Which unadopted roads and where is this in any survey and where are the responses?

7.Infrastructure Investment Priorities
There is no mention of the community centre here yet in the 1st survey this scored very highly as an important facility to retain and maintain as part of the village. Over 60% of respondents stated that the leisure centre and the community centre were very important as opposed to less than 40% citing the courthouse and All Saints Church. However, these have been put forward to receive attention/actions/monies. Again is this simply the committee's views on what should receive monies?

8. Community Actions
There has been no public debate or reference to Assets of Community Value and no evidence that there has been dialogue regarding it with both private owners, trusts or organisations. This is yet

another idea that has sprung from the NP committee without any reference to the community or stimulus from it. Genuine community actions that were clearly pinpointed in the first survey have been ignored.

9. Full Representation
The original questionnaire consisted of 3 surveys: Household, Business and Youth. This draft makes reference to the first but the other 2 appear to have been side-lined yet both contain valuable and insightful points for the future of Stradbroke and lead to various community actions.

S05

Environment Agency

Our ref:	AE/2018/122462/01-L01
Your ref:	*
Date:	27 February 2018

Stradbroke Parish Council
Mill Hill House Church Lane
Wickham Skeith
Eye
IP23 8NA

Dear Mrs Wladon

DRAFT STRADBROKE NEIGHBOURHOOD PLAN STRADBROKE

Thank you for consulting us on the Draft Stradbroke Neighbourhood Plan.

Our principal aims are to protect and improve the environment, and to promote sustainable development, we:

- Act to reduce climate change and its consequences
- Protect and improve water, land and air
- Work with people and communities to create better places
- Work with businesses and other organisations to use resources wisely

You may find the following two documents useful. They explain our role in in the planning process in more detail and describe how we work with others; they provide:
:

- an overview of our role in development and when you should contact us.
- initial advice on how to manage the environmental impact and opportunities of development.
- signposting to further information which will help you with development.
- links to the consents and permits you or developers may need from us.

Building a better environment: Our role in development and how we can help: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf

Environmental Quality in Spatial Planning http://www.english-heritage.org.uk/publications/environmental-quality-in-spatial-planning-supplementary-files/

Please also find attached to this e mail our document “Planning for the environment at the neighbourhood level.”

Infrastructure

We feel this section would be improved by reference to the current situation regarding the disposal and treatment of sewage in the locality. Disposal of new development to the Water Treatment Works at Eye would bring that facility close to the upper limits of its permit.

Developers should consult with Anglian Water and if necessary development should be phased to align with any improvements required.

Your plan should consider if there are opportunities for increasing reuse and recycling facilities and for decreasing incidents of fly tipping.

Environment and Heritage

We welcome the recognition given to the importance of local green spaces. Further exploration of how these spaces relate to each other and to habitat outside of the village boundary (connectivity) would give you an understanding of how “green corridors” could be created and enhanced.

It is also important to recognise and value the “blue environment.”

There are ecological improvements needed to be made to the two tributaries of the Waveney close to Stradbroke: Chickering Beck (waterbody ID GB105034045690) and the unnamed tributary GB105034045740. Works that need to be undertaken for these waterbodies to achieve Good Ecological Status include undertaking river habitat enhancements, riparian tree planting and working with local landowners to reduce diffuse pollution from agriculture.

Any development must not cause a deterioration in Water Framework Directive status to either of these waterbodies. For example, drainage from new housing should be designed to trap and control pollutants from domestic car washing and the use of garden pesticides and herbicides.

Measures to capture rainwater in developments should be installed to enable this water to be used in the garden and for washing cars and to reduce water demand. New developments should be designed to achieve a maximum water consumption of 110litrese per person per day.

Please note that the view expressed in this letter by the Environment Agency is a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application.

Please contact me on the details below should you have any questions or would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan.

Yours sincerely

Mr GRAHAM STEEL
Sustainable Places - Planning Advisor

Direct dial 02 03 02 58389
Direct e-mail graham.steel@environment-agency.gov.uk

S06

NHS England

NHS England Midlands & East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex
CM2 5PF

Email address: kerryharding@nhs.net
Telephone Number – 0113 824 9111

Our Ref: NHSE/STRAD/NDP/KH

Your Ref: Stradbroke Neighbourhood Development Plan

Stradbroke Parish Council

Email Only – StradbrokePC@outlook.com

28 February 2018

Dear Sirs

Stradbroke Neighbourhood Development Plan 2016- 2036
(Pre-submission Consultation)

I write following the above consultation on behalf of NHS England Midlands and East (East) (NHS England) and Ipswich and East Suffolk Clinical Commissioning Group (CCG).

We have reviewed the information available and note that there is reference to the access of local healthcare services for the current and future population of Stradbroke. It is also noted that there does not appear to be reference to the provision of assisted living developments or nursing/ care homes to cater for an aging population. Stradbroke is currently serviced by Stradbroke medical centre, a branch of Fressingfield GP Practice; in terms of premises space this practice currently has capacity.

The plan identifies preference for housing developments with smaller numbers of dwellings rather than large developments. Please bear in mind that the planning obligations that can be gained from larger number of smaller developments will not always have as much benefit as one large development. This will limit the options available for the provision of additional community infrastructure to be delivered as part of a scheme and NHS England have limited funding available to invest in creating additional capacity as a result of development growth.

We would welcome the addition of a simple statement, to confirm that Stradbroke Parish Council will support NHS England and the CCG in ensuring suitable and sustainable provision of Primary Healthcare services for the residents of Stradbroke. At the appropriate time NHS England and the CCG would welcome the opportunity to discuss with the Parish Council potential solutions to ensure sustainable Primary Care services for the local community.

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

Yours faithfully

Kerry Harding
Head of Estates

High quality care for all, now and for future generations

X01

GLADMAN
DEVELOPMENTS LIMITED

Gladman House, Alexandria Way
Congleton Business Park
Congleton, Cheshire
CW12 1LB

T: 01260 288800
F: 01260 288801

www.gladman.co.uk

By email only to: stradbrokepc@outlook.com

Dear Sir/Madam,

Re: Stradbroke Neighbourhood Plan – Regulation 14 consultation

Introduction

This letter provides the response of Gladman Developments Ltd. (hereafter referred to as "Gladman"). Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.

Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic growth.

Gladman has been involved in contributing to the plan preparation process across England through the submission of written representations and participation at local plan and neighbourhood plan public examination.

Structure of representations

These representations are structured to follow the consultation document and will cover the following key topic areas:

- Legal compliance
- Consistency with the Development Plan
- Neighbourhood Plan polices

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the Stradbroke Neighbourhood Plan (SNP) must meet are as follows:

(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.
(d) The making of the order contributes to the achievement of sustainable development.
(e) The making of the order 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).
(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

Directors: D J Gladman BA, K J Gladman MCSP, SRP, J M S Shepherd BSc, CEng, MIEE, G K Edwards DipTP, MRTPI
VAT Registration No. 677 6792 63
Registered Address: Gladman House, Alexandria Way, Congleton Business Park, Congleton, Cheshire, CW12 1LB, Registration No. 3341567

National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded.

Relationship to Local Plans

To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The adopted Development Plan relevant for the preparation of the SNP consists of the saved policies of the Mid Suffolk District Local Plan (1998), the First Alteration to the Mid Suffolk Local Plan (2006), the Mid Suffolk District Core Strategy (2008) and the Mid Suffolk District Core Strategy Focused Review (2012)

However, it is important to note that the Council in partnership with Babergh District Council are preparing a new joint local plan to meet the requirements of the Framework. As such, it is important that the SNP allows for flexibility and adaptability so it can positively respond to changes in circumstance which may arise over the duration of the plan period. This degree of flexibility is required to ensure that the SNP is capable of being effective over the duration of it plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:

> 'if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).'

Stradbroke Neighbourhood Plan

These representations are made to the current consultation on the pre-submission version of the SNP, under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.

This section highlights the key issues that Gladman would like to raise with regards to the contents of the SNP as currently proposed and its consistency with the requirements of national policy and guidance. To address these inconsistencies Gladman has sought to recommend a series of alternative options to be considered so that the Plan fully reflects the requirements of national policy and guidance.

Neighbourhood Plan Policies

Policy STRAD1: Development Strategy and Principles

Whilst it is acknowledged that the SNP seeks to allocate land for housing, Gladman is concerned that policy STRAD1 in its current form will act to preclude the delivery of otherwise sustainable development opportunities located beyond the proposed settlement boundary from coming forward. The Framework is clear that development that is sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development. The use of a settlement boundary will likely act to arbitrarily restrict growth opportunities from coming forward and therefore does not accord with the positive approach to growth required by the Framework.

Indeed, the PPG is clear that all settlements can play a role in delivering sustainable development, so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence[1]. Accordingly, Gladman recommend that a more flexible stance to development that is well related to Stradbroke is taken and the following wording is put forward for consideration:

"When considering development proposals, the Stradbroke Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Stradbroke Neighbourhood Plan will be supported particularly where:

- Provide new homes including market and affordable housing; or
- Opportunities for new business facilities through new or expanded premises; or
- Infrastructure to ensure the continued vitality and viability of the neighbourhood area.

Development adjacent to the existing settlement will be permitted provided that any adverse impacts do not significantly and demonstrably outweigh the benefits of development."

Policy STRAD2: Design Principles

[1] PPG Paragraph: 001 Reference ID: 50-001-20160519

Whilst recognising the importance of ensuring good design is incorporated into future development proposals, the Framework is clear that design policies should avoid unnecessary prescription or detail and should not attempt to impose architectural styles or particular tastes and should not stifle innovation, originality or initiate through unsubstantiated requirements to conform to certain development forms or styles.

In this regard, the design policy as currently worded requires all development proposals to meet the requirements of the policy which places an onerous burden on development such as minimum garden sizes or meeting all requirements of Secure By Design which is guidance and not policy. Indeed, many of the design principles may not be relevant to a development proposal i.e. small scale development, householder extension etc.

Gladman recommend that the design principles are amended and reference minimum garden sizes, landscape buffers are deleted and that development proposals are 'encouraged' to have regard to Secure by Design guidance.

Policy STRAD3: Housing mix

In principle, Gladman generally support the principle of the above policy which seeks to provide a mix of housing types. However, it should be noted that housing mix can change over the plan period and it would be more appropriate if the policy referenced 'in accordance with the latest Strategic Housing Market Assessment' as opposed to setting out a specific housing mix requirement. This modification will ensure that the policy remains responsive to changes in circumstance when new evidence is made available over the duration of the plan period.

Policy STRAD10: Local Green Spaces

Gladman remind the Parish Council that the Framework makes clear at Paragraph 76 that designation of land as Local Green Space (LGS) should be consistent with the local planning of sustainable development for the area. Paragraph 77 sets out three tests that must be met for the designation of Local Green Spaces. Paragraph 77 states that:

"The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:
- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreation value (including as a playing field), tranquillity or richness of its wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land." (emphasis added)

It is considered that there is insufficient evidence to support the proposed designations against the requirements listed above. Indeed, this issue was highlighted in the Examiner's Report to the Wantage Neighbourhood Plan[2] which stated:

"12.5 Overall, there is simply insufficient, proportionate, robust evidence to support the proposed designations in the plan promoted by this policy. Given this I am not in a position to determine which green spaces should be retained in the plan. I would recommend that the policy be deleted. "

Gladman recommend that the Steering Group assess the proposed sites against all three tests which must be met for LGS designation to ensure the proposed allocations are consistent with the requirements of the Framework.

Conclusions

[2]http://www.whitehorsedc.gov.uk/sites/default/files/Wantage%20NP%20Report%20Final%2030.7.16.pdf

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. Whilst we support many of the policies aims and objectives in principle, we feel that the Plan would benefit from additional modifications to the Plan to ensure that it allows for flexibility going forward and ensures the Plan is capable of reacting positively to changes that may occur over the plan period.

Gladman hopes you have found these representations helpful and constructive.

Yours faithfully,
John Fleming

R14

- **Message Details:**
  -
    - **Name**
    - **Email**
    - **Subject** Neighbourhood Plan Response
    - **Message** Dear Stradbroke Parish Council, Firstly the Parish Council and the Neighbourhood Planning group should be commended on a thorough piece of work. My response is as follows: 1) I am pleased that all of the sites selected, except one (Farriers Close), are going to be accessed, for both construction and habitation, from the arterial roads of the village and not through existing housing developments. 2) Have every sympathy with the residents of Farriers Close and I think at a minimum serious consideration should be given to an alternative access route to the site for construction traffic NOT down Farriers Close. If an alternative could be found and workable then possibly this could be a long term access solution to the site. 3) I would like to understand how any future planning applications for new developments on sites outside the Neighbourhood Plan will be managed. Will such applications be automatically rejected? If so how long will this amnesty last? 4) I would also like to understand that if any of the chosen sites do not deliver the estimated number of properties then what? 5)As a parent and teacher at the High School I would like to understand the plans for the development of these sites and how this marries with the expansion of the village infrastructure especially the doctors and schools. Best wishes,
- **Sent on:** 1 March, 2018

X02

This response is made on behalf of the Governing Body of the All Saints Church Schools Federation and All Saints Schools Trust who are responsible for running Stradbroke Church of England Primary School.

Stradbroke Primary School welcomes the neighbourhood plan and its strong focus on education and the needs of families with children. Stradbroke is a rural area with a older than average age profile and services for children and families are not always seen as a priority.

Numbers of children have dropped across rural parts of Mid-Suffolk over the last decade and the plan's emphasis on providing affordable and low cost housing should provide greater opportunities for young families to be able to settle in the village. This will help the school remain viable.

In recent years we have take significant steps to secure the long term viability of the school. We started a partnership in 2014 with All Saints Church of England Primary School in Laxfield which developed into a Federation in 2015. The two schools share

amongst other things a Headteacher and have a single governing body. Both these schools are founder members of the All Saints Schools Trust which is a new multi academy trust consisting of rural church and community primary schools in North Suffolk. The other founder members are St Peter and St Paul Church of England Primary School in Eye, Fressingfield Church of England Primary School and Wortham Primary School.

This partnership working helps to keep schools sustainable but all schools need children to remain viable. In addition we know from our experience running Laxfield that a strong pre-school provision helps both local families and the viability of the school. We have seen a strong growth in numbers at Laxfield which is in part attributable to the new pre-school that opened around 7 years ago on the school site.

Our response to the proposed policies:

STRAD3
We welcome the commitment to a mix of housing. Our experience is that younger families often need smaller houses to begin with when they have perhaps one small child but do also need opportunities to move to larger houses as families grow. This can be an issue at present with either a lack of smaller houses for younger families or larger houses for growing families that are still affordable.

STRAD5
We strongly welcome the commitment to a pre-school/nursery and would strongly recommend that this would be best located on our site. Additional land to enable this would be welcome. The existing pre-school at the Primary School is located in an out of date building and this means it is only able to operate for limited hours. A new purpose-built facility would enable a much more comprehensive service to be provided.

The school cannot use its funds to pay for a pre-school/nursery so this project would need to be funded independently and we would suggest that this would be a good use of CIL money due to Mid Suffolk District Council and Stradbroke Parish Council.

We also welcome the commitment to measures to improve traffic outside the school particularly at pick up/drop off times. We would remind the Parish Council of the need to work together with the school on any such proposals.

STRAD7
We would welcome more opportunities for children to be able to walk and cycle to school safely particularly off road.

STRAD18
We welcome the opportunities this could bring for the school and for local children and families. Currently the school does not have long term security for its playing field which

is leased to us. This proposal could secure this and provide opportunities for improved access and car parking as well as a site for a new nursery.

Infrastructure Investment Priorities

We welcome the inclusion of a new nursery/pre-school as the first priority shown on the list.
We also welcome the commitment to look to improve transport for Post-16 provision. Whilst we only run primary schools we are clearly still interested in the opportunities for children once they have left both primary and high school.

James Hargrave
On Behalf of:
Governing Body of All Saints Church Schools Federation
All Saints Schools Trust Board of Trustees

L02

Re: Stradbroke Draft Neighbourhood Plan.

Dear Odile,
I am writing to comment on the Draft Stradbroke Neighbourhood Plan on behalf of myself and Nick Stones of Cottage Farm, for the avoidance of doubt, “I” and “me” refers to myself, “we” and “our” to myself and Nick Stones of Cottage Farm.

We believe that the sites proposed that relate best to the existing settlement pattern are those at the core of the village, STRAD16 and STRAD18.
Sites STRAD15 and STRAD17 are perimeter development and will be very prominent on entering the village.

Whilst site STRAD18 has the potential benefit of providing a new vehicle drop off point for the primary school that will only work if drivers are prepared to make the journey to the rear through the new estate road.
However, all pedestrian access to the school excepting that from the new development (STRAD18) and existing properties North of the school will still be via the restricted footway on Queen Street. The danger will actually be worsened if the parking congestion is solved as traffic speed will then be higher and immediately adjacent to the narrow footway.

The site at Cottage Farm was submitted to MSDC in 2014 and brought forward as “with potential to support development” in the draft SHLAA published in May 2016.
In 2017 we had numerous conversations with the leader of the Neighbourhood Plan working group who suggested to us it would work well with the site now known as STRAD18 making it possible to provide safe foot and cycle access from the North of the village right through to the other core facilities (Community centre, Surgery, Swimming pool, High school) without needing to use the existing restricted footway on Queen Street by the Primary School or navigate the T junction opposite the Spar shop.

The Neighbourhood Plan working group then showed this idea (sites 5 and 7) at the Public Consultation at the Courthouse in October 2017 as one of the options to consider at which several members of the public spoke to me and said they were in favour.
Very soon after, discussion between ourselves to explore possibilities and the landowner of STRAD18 started favourably but unfortunately the landowner did not want us to approach the Neighbourhood Plan working group to explain our position.
No further communication was received from the working group, I sent an e-mail in November explaining my willingness to continue working on the proposal but did not receive a reply. The next communication was effectively the Draft Plan.

The Cottage Farm/Meadow Way proposal submitted to MSDC in 2014, brought forward in the May 2016 SHLAA document and numbered 5 for the Public consultation fits with all the relevant policy criteria in the Draft Stradbroke Neighbourhood Plan.
My understanding is that when people are asked about development, the main cause for concern is usually the size of that development, it is much preferred for the village to grow slowly and from the core as it has done for hundreds of years.
Faced with the task of providing a considerable number of new dwellings in a relatively short period of time, the effect can be mitigated by situating them carefully within the village as opposed to the perimeter which is effectively ribbon development.
Our site, whether considered in conjunction with STRAD18 to provide pedestrian and cycle access or standing alone relates well to the existing village settlement pattern as do sites STRAD18 and STRAD16.

We are confused as to why communication ceased and site 5 has not been put forward in the Draft Plan, believing it to be more suitable than sites STRAD15 and STRAD17.
The opportunity to provide safer access to both Schools and the core facilities in the village has been missed.
Please could you provide us with your documented evidence base showing the method and results for assimilating Public opinion leading to the selection of sites.

For the above reasons we are at the moment objecting to the Draft Plan.

Steve Lee.
Nick Stones.

Steve Lee, S R Lee Builder Ltd.

S07

Date: 2nd March 2018
Enquiries to: Cameron Clow
Tel: 01473 260171
Email: cameron.clow@suffolk.go.uk

Suffolk County Council

Stradbroke Parish Council
Mill Hill House
Church Lane
Wickham Skeith
Suffolk IP23 8NA

Dear Odile Wladon,
Submission version of the Stradbroke Neighbourhood Plan

Thank you for consulting Suffolk County Council on the Submission version of the Stradbroke Neighbourhood Plan.

The County Council is not a plan making authority, except for minerals and waste. However, it is a fundamental part of the planning system being responsible for matters including:

- Archaeology
- Education
- Fire and Rescue
- Flooding
- Minerals and Waste
- Natural Environment
- Rights of Way
- Transport

This response, as with all those comments which the County Council makes on emerging planning policies and allocations, will focus on matters relating to those services.

Suffolk County Council is supportive of the Stradbroke Neighbourhood Plan's vision for the Parish. Some issues are raised below, however the County Council is open to discussion in order to resolve these issues.

Archaeology
The plan includes heritage and local character as a theme in the policies, which is welcome, and the supporting information demonstrates consultation of the County Historic Environment Record.

SCC Archaeology Service would welcome a sentence in Chapter 7, which recognises the need for evaluation and consideration of archaeological remains in planning decisions and offers commitment to the appropriate management of archaeological remains on development sites.

We offer the following comments on site allocations, which have particular potential to impact as yet unknown archaeological remains relating to early settlement and also, in particular, medieval 'suburban' activities:

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- Site C: The site is on the edge of the medieval settlement, and has not been systematically assessed for archaeological remains. We would welcome an addition to the policy to state that any planning application should be supported by the results of an archaeological evaluation which enables impacts on archaeological remains to be considered and provision made for preservation, if appropriate. Geophysical survey would be appropriate as a first stage of works. This matches advice given for the Mid Suffolk SHLAA in 2016 for site STR(NS)06.

- Site D: Land South of Mill Lane. The site is on the edge of the medieval settlement, and has not been systematically assessed for archaeological remains. We would welcome an addition to the policy to state that any planning application should be supported by the results of an archaeological evaluation which enables impacts on archaeological remains to be considered and provision made for preservation, if appropriate Geophysical survey would be appropriate as a first stage of works. This matches advice given for the Mid Suffolk SHLAA in 2016 for site STR(01).

- Site B is adjacent to The Priory (listed building 280217) and its associated moat. This is acknowledged in the plan, as is the need to protect and enhance the setting of the listed building. The current shielding of the site due to existing vegetation is noted, but it is also the relationship of the complex in relation to the wider landscape which will be impacted, and the significance of heritage assets and significance of impacts on their setting would need to be assessed, in accordance with Historic England guidance. The moat as a feature would have had a context as a boundary feature between the house and more open space. I would advise that the policy should set out that the concept plan and development designs should be informed by rigorous assessment of the significance of heritage assets and impacts on the setting, and that buffers, viewpoints through the site, and design concepts informed by it. Caution may be needed in terms of housing numbers, particularly given that some of the site is allocated for school expansion. Mid Suffolk Conservation Officers would offer advice on approaches to assessment and the significance of impacts. Additionally, we would advise, for the purposes of project management, that early archaeological evaluation will enable the nature and character of remains on the site to be assessed and appropriate provision made in project planning.

Education

Stradbroke Parish Council has been proactive in policies relating to education, which is welcome.

Early Years
Stradbroke has one early years setting which is co-located at Stradbroke primary school. There is currently available provision for the estimated 26 (maximum) children arising from allocated sites requiring early years places within the ward. However, due to current restrictions at the primary school (see below) the County Council supports the provisions in policy STRAD18, which enables the re-provisioning of the pre-school at the primary school, providing more room for primary school expansion. Whilst the County Council is supportive of this principle it is not clear where funding for this project could be sourced.

Stradbroke Primary School
The table below outlines the current capacities forecast for Stradbroke Primary School. These figures account for site at Grove Farm which currently has planning application for 44 dwellings.

		Forecasts				
PAN	**CAPACITY**	**2017**	**2018**	**2019**	**2020**	**2021**
20	140	97	105	103	106	109

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	Surplus	43	35	37	34	31
	Surplus w/ 5% buffer	36	28	30	27	24

The allocations in the site would generate approximately 53 primary school pupils (maximum), which would exceed the school's current capacity, but the school does have room to expand to a 210 place school. However, there would not be enough land to meet BB103 requirements. For these reasons the County Council supports the provisions in policy STRAD18, which enables the re-provisioning of the pre-school at the primary school, providing more room for primary school expansion.

Stradbroke High School
The County Council do not foresee any issues with the plan regarding the High School, which will be able to provide spaces for the to the pupils generated by the site allocations.

Sixth Form
The catchment sixth form school for pupils arising from Stradbroke is Thomas Mills, which currently has capacity to provide spaces to sixth form pupils generated by the plans site allocations.

Fire and Rescue

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.

Flooding

The County Council has a number of issues regarding policy STRAD4, concerning flood management and drainage. The importance of flood issues to the Plan and to Stradbroke Parish Council and residents is recognised, and the County Council will offer support to ensure an appropriate policy is in place.

Flood elements of this policy should be separated into their own policy as the aim of flood policy is to manage risk, whereas utilities provision is about meeting an infrastructure need. While the two are connected with regards to drainage, a policy outlining how flood risk should be managed will be more clear and effective if it is separate.

There are also a number of factual inaccuracies that should be corrected in the Flooding and Drainage section on page 21:

- The statement in paragraph 'a' "a number of areas in the village are at considerable risk of flooding, particularly surface water flooding" is incorrect. The majority of the parish is in flood zone 1, the exception to this is small areas of flood zone 3 bordering water courses, which can be affected by significant rainfall events. According to technical guidance to the National Planning policy Framework, "areas at risk of flooding" is land in flood zone 2 and 3, or land which has a critical drainage problem notified to the local planning authority or Environment Agency. The County Council has no record of flood events within the parish, however if the Parish Council has different evidence the County Council would take this into consideration.
- Some of the parish is however at risk of surface water flooding and as such development these area's should be avoided or mitigated. We can provide a surface water flood water on request for the parish.

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- Paragraph ‘b’ states that “in Stradbroke there are a number of swales”, however there are no recorded swales in Stradbroke, this should be changed to “ordinary watercourses”.
- Paragraph ‘c’ contains a misguided view of Sustainable Drainage Systems (SuDS), stating it “is used in urban areas where it is not cost effective to drain into the ground” and that it is not suitable in a rural area such as Stradbroke. The term “urban” is no longer specified in SuDS as the principles should apply to all built environments, including rural environments. SuDS is a system to use the best drainage option available. Development should follow a hierarchy of SuDS which is:

    1. infiltration into the ground
    2. to a surface water body;
    3. to a surface water sewer, highway drain, or another drainage system;
    4. to a combined sewer.

  Flood risk policy should make reference to this hierarchy with preference to measures as high up as is practically possible.

The flood risk section of the plan should make reference to national and local policy in regards to flood risk management. National policy is outlined in paragraph 100 of the NPPF. Local policy to refer to is the Flood Risk Management Strategy produced by the Flood Risk Management Partnership and Policy CS 4 of the Mid Suffolk Core Strategy. Flood risk policy should also require assessment of all flood types, including from river or the sea (flood zones 1,2,3), surface water, ground water, reservoirs and make reference to this hierarchy with preference to measures as high up as is practically possible.

The County Council recommends the Flooding and Drainage sub section (under the Infrastructure section) should be its own section in the plan. As a starting point for a flood risk policy the Council would suggest the following wording:

“Development should be directed away from areas of the highest flood risk, including risk from river or the sea, surface water, ground water, and reservoirs. Flood risk should be managed using Sustainable Drainage Systems (SuDS) and the method of discharge should be as high up the hierarchy of drainage options as is possible, once the other options have been proved not to be viable. Development is encouraged to take opportunities to reduce flood risk and create betterment.

It is the preference of the Parish Council that where surface run off cannot be discharged into the ground the method of discharge is adoptable by a risk management authority.”

The County Council will be pleased to help with the Stradbroke Neighbourhood Planning in producing an effective flood risk policy.

<u>Minerals and Waste</u>
In responding regarding minerals and waste matters the County Council will be referring to the currently adopted Minerals Core Strategy and Waste Core Strategy and the emerging Suffolk Minerals and Waste Local Plan.

Minerals
The neighbourhood plan area of Stradbroke and the sites the Neighbourhood plan is currently allocating do not coincide with the minerals consultation area and are not within proximity to any currently operating or allocated minerals extraction sites.

Waste

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There are two waste facilities within Stradbroke. An Anglian Water Waste Water Treatment Plant and the Barley Briggs Biogas anaerobic digestion plant. Existing waste sites are safeguarded under policy WDM1 of the Waste Core Strategy. However, the Barley Briggs Biogas Site is more than 250m from any allocated sites, so it is not expected that allocated sites will have an impact on the operation of this site. The closest allocated Site to the Waste Water Treatment Plant has already been granted planning permission and the County Council raised no objection. The other sites are not expected to prejudice the operation of the waste water plant.

Emerging Suffolk Minerals and Waste Local Plan
The Emerging Minerals and Waste Local Plan is expected to be adopted in 2019. This new plan contains a more extensive minerals consultation area and additional minerals extraction sites. A small area in the north of the Parish will be within the draft minerals consultation area, however it is approximately 500m from the northern edge of the built-up village of Stradbroke, so no allocated sites or policies are expected to sterilise mineral resources as identified in the draft minerals and waste plan. No new minerals or waste sites are being proposed in the proximity of Stradbroke in the draft plan. The anaerobic digestion site and the waste water treatment site within Stradbroke are safeguarded within the draft plan.

Natural Environment

Landscape
The majority of the plan is well balanced in regards to landscape, however the County Council is concerned that Policy STRAD 13 is overly restrictive in this regard. The policy would benefit from a minor change of wording from “the proposals are not detrimental to the character of the wider countryside or the views across it;” to “the proposals are not significantly detrimental to the character of the wider countryside or the views across it;”.

The policy should outline the positive benefits that an employment proposal is expected to deliver for the village, rather than solely the negative effects it should seek to minimise. In this way the policy will be demonstrably balanced, the benefits of a proposal being weighed against any adverse impact on the character of the village.

Public Rights of Way
Encouragement of development connecting to public rights of way as part of the sustainable transport network is welcome.

Highways and Transport
The emphasis placed on sustainable modes of transport in the plan, such as walking and cycling, is welcome, particularly where this improves access to the schools. The County Council would suggest some changes to the wording of Policy STRAD7 to make this policy more effective:

“Development adjacent to Walkway Routes will be expected to:”

It is recommended that this wording is changed to “Where practical development in the vicinity identified walkway routes of will be expected to:” This will be more closely aligned to paragraph 35 of the NPPF and will help to better connect developments that aren’t directly adjacent to existing walkaways to the wider pedestrian and cycle network.

The second bullet point of this paragraph which reads “make developer contributions through the Community Infrastructure Levy (CIL) toward the enhancement of these Walkway Routes, particularly at key points of conflict between pedestrians/cyclists and vehicular traffic;” should also be changed. Section 106 agreements may be a better way to collect developer contributions for this purpose. It is suggested this wording is changed to “make developer contributions toward the enhancement of these Walkway Routes, particularly at key points of conflict between pedestrians/cyclists and vehicular traffic;” in order to provide flexibility.

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Reference to the Suffolk Design Guide regarding standards of highways infrastructure is policy STRAD8 is welcome.

Parking
Policy requiring adequate parking measure is welcome, but should make reference to Suffolk Guidance for Parking (2015)[1], which has been adopted by Mid-Suffolk District Council. The County Council suggest amending Policy STRAD9 from:

"Development proposals that generate an increased need for parking must provide suitable off-street parking…";

To:

"Development proposals that generate an increased need for parking must provide suitable off-street parking in accordance with the Suffolk Guidance for Parking (2015),…"

Site A – Policy STRAD15
At the time of writing this response there is a planning application on this site. Footway improvements will be required to link the site to the rest of the village and the existing private footpath will require widening and reconstructing to an adoptable standard. The indicative concept plan and the current planning application on this site bot have two accesses; Suffolk County Council Highways has requested a single access.

Site B – Policy STRAD 16
This site has good footway links to the existing network. Farriers close, which would be the site's highways access has sufficient visibility onto the B1118.

Site C – Policy STRAD 17
This site would require a footway along the frontage to connect it to the existing pedestrian network.

Site D – Policy STRAD 18
A footway will be required along the frontage to connect the site to existing networks and exiting footways will likely be require improvements such as widening. Carriage way widening will be required on mill lane.

Overall it is expected there is sufficient capacity on the highway network for the proposed sites.

I hope that these comments are helpful. The County Council is always willing to discuss issues or queries you may have. Some of these issues may be addressed by the County Council'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,

Cameron Clow

Planning Officer, Growth, Highways and Infrastucture

[1] https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/2015-11-16-FINAL-2015-Updated-Suffolk-Guidance-for-Parking.pdf

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R15

- **Message Details:**
  -
    - **Name**
    - **Email**
    - **Subject** Comments of Pre-Consultation Document
    - **Message** Stradbroke Parish Neighbourhood Plain 2016-2036 – Pre-submission Consultation Further to the issue of the draft document relating to the above and the detailed comments that I submitted to the Parish Council as an online submission on 25th October 2018, I write to respond to the latest information that has been provided. At the outset, I must express my disappointment that the key points that I raised in my note of 25th October last year do not seem to have been addressed in the development of the draft plan; these provided serious inputs regarding the following: 1. Traffic Volumes in Queen Street 2. The "Choke Point" in Queen Street outside the Primary School 3. The Queen Street / Mill Street Junction 4. Queen Street Site – Land to the South of Mill Lane (which is to the rear of our listed property). In addition, the location of the Primary School was raised very specifically and, in particular, whether or not the current location of the school had been assessed, openly and without prejudice, as an essential criterion in the overall development of the plan? Having looked in depth at the pre-submission consultation, it is hard not to conclude that all the above have only received scant, if any attention and that there has, therefore, been a limited and myopic approach in the development of the plan. As the basis of a formal response, therefore, I am re-submitting the overall text that I provided last October along with some amplifications and modifications that will, I trust, be considered objectively and in detail – the issue such as the future location of the Primary School is something that should surely be at the centre of longer term planning for the village and its seeming absence within the latest consideration is troublesome. As previously advised, my wife and I moved to Stradbroke comparatively recently (in April 2015) and we live in the house that is, arguably, closest to Stradbroke Primary School (on the same side of the road), our house is in a location that is truly sensitive in several ways. Whilst we fully understand that there are pressures to add to the housing stock of rural villages throughout the County, and we support the development of a local plan; we remain profoundly concerned that there has been limited thinking in the approach that is being adopted, and that it seems that the retention of the Primary School, in its present location, is of seminal importance and that increasing the number of pupils is a primary objective. We are concerned – indeed staggered – that it appears that consideration of infrastructure issues and especially the capability and capacity of the road system to cope with some of the changes proposed are not being accorded the high profile that is, indisputably, required. Our property is a Listed Building on the edge of a Conservation Area and since we arrived here is Suffolk, we have invested very significantly both in the structure of the main house and its grounds to restore the building appropriately and to develop what we suggest is a suitable ambiance for such an old property. The view across the fields to the rear is a key and agreeable feature (as it is to neighbours with a listed home) and any development of this area,

would provide a regrettable intrusion into and blight on the countryside; further it would unquestionably have a negative impact on our home (an image of which has been included in the draft plan (without any consent on our part, which is both surprising and unfortunate). Personal considerations apart, and having analysed the information provided in more detail, please note the following: 1. Traffic Volumes in Queen Street During the last 34 months, traffic volumes have increased not insignificantly; it is not just in the number of the vehicles using the road, but in their character. Daily, sizeable agricultural machines (modern JCB Fast Track or equivalent with 17 tonne trailers) use the road, and all too often at speeds of 40 mph and more, notwithstanding the speed limit and the 20 mph advisory limit by the Primary School; indeed, and as previously advised, and when there was no school traffic, in the week commencing 16th October, a 15.6 metre (51') skid mark appeared outside No. 2 and Wheatsheaf Cottages when one such machine was close to causing an accident. Other agricultural machines which, from time to time, use this road include combine and sugar beet harvesters. Looking at Commercial Traffic, the number of large articulated lorries and trailers is not diminishing and it has been acknowledged that these volumes have been on the increase. As a result, potentially dangerous situations arise all too often – the lack of / failure to impose speed restrictions is unfortunate and the potential consequences are self-evident. 2. Queen Street including "Choke Point" (outside the Primary School) Notwithstanding thoughts that a car park to the rear of the existing school could, eventually be provided, it should be noted, and it must be recognised that the width of the road in Queen Street varies considerably. As previously indicated, rough measurements indicate that the road is 5.5 metres wide outside No. 2 Cottage; this increases to 6.5 metres outside our property; it is, however, just 5.9 metres outside Sunnyside, which has no off-road parking – for much of time, therefore, the width at this point is reduced by at least a car's width. There is no scope to widen the road and whilst much of the focus around this area concentrates on the challenges during term time and the ingress and egress of people to and the from the Primary School itself (of course, the arrival and departure of School buses do add to the traffic chaos), it is the case that the pressures remain in this area at other times as well as indicated above). It is, absolutely not the case that it is only during school opening and closing times that the traffic pressures arise, albeit these is no question that at these times they can be exacerbated. In addition, with the site of the former Petrol Station now being redeveloped this will add to the traffic volumes in Queen Street 3. Queen Street / Mill Street Junction There are several points of a concerning nature that need to be articulated; these include: a. It is understood that the site of Grove Farm has planning permission for an additional 44 dwellings – assuming a mean of around 1.5 vehicles per property, this implies around 60 - 70 further vehicles, the use of which will need to be absorbed within the existing road system. All the traffic from this development will impinge on the above junction, and this is but one of the developments that is proposed. b. Looking at commercial traffic and following the recent expansion of the business at the Mill, the volume of heavy lorries, and particularly articulated vehicles with their trailers has unquestionably increased and anecdotally, it is understood that if the anticipated growth plans for the business are realised, then axiomatically the volume of this

commercial traffic will continue to increase. (On a related point, is it the case that additional residential premises so closely adjacent to an expanding industrial site should be considered?) c. If a Car Park to the rear of the School Playing Field was to be provided, and the school population increases by around 50 pupils, then a substantial number of vehicles would use this facility including, school buses. 4. Land to the South of Mill Lane Any combination of the above point to an increase in number of vehicles that would have to use the Queen Street / Mill Street junction and therefore potentially to much increased congestion on a road system that is already stressed. The width of Mill Street is just 6.1 metres and the limitations that this affords for articulated lorries going in and out into Queen Street should be self-evident; further any rational consideration of these points confirm the view that the junction of Queen Street / Mill Street will not be fit for purpose to accommodate the volumes of traffic In the light of the above, it does seem incredible - even illogical - that there seems to be such concentrated focus on putting more pressure on to Queen Street both in its main thoroughfare and the junction with Mill Lane. It is hard to conclude that the issue of the chronic situation is Queen Street, with the health, safety and welfare issues that are manifestly apparent, have been set to one side as other short-term aspirations have been pursued – it must be the case that fuller and more rational explanations are provided. In my submission of October 2018, I asked, very specifically, the following, "In terms of the Primary School, has consideration been given to the development of a new school on another site, and if not, then why not? Precedents such as recent closures of schools in Coddenham and Mendlesham demonstrate that this is possible. Considerable grants and funding are available for proactive and creative thinking – has the possible re-location of the school, the sale and re-development of the site of the exiting Primary School been considered, and if not, then why not?" I commented further that, "It has been brought to our notice that during recent meetings at the Primary School the week before last, parents of children attending the school were given the distinct impression that the development of Site 7, with "the provision of 75 dwellings" were, seemingly a "done deal" – the only reasonable reaction is that comments to this end, no matter whether they were deliberately intended or not, were, and indeed, are, utterly inappropriate. The fact that this impression can have been provided should be a matter of grave concern; indeed, it must be the case that any such assertion (not matter how deliberate or otherwise) points to prejudice and pre-determination and from a legal standpoint this must, at the very least, be doubtful." As indicated above, it does seem that the current location of the Primary School has been "ring fenced" in the preparation of this outline plan and therefore, the opportunity to explore the provision of an up to date, modern, environmentally friendly school with a reasonable and appropriately sized playing field (which would provide scope for the development and enjoyment of better physical training and a more healthy education in line with government policies). It must be germane to ask about the location of the Primary School and why other locations, for example adjacent to Stradbroke High School of in other locations where access would not, remotely, be as difficult as it is now, or will be if the proposed changes are permitted; has this been a consideration, and if not, why not? Overall, it is hard not to conclude that the real driver in the development of the plan has been

driven principally by the perceived need to add residential dwellings to the village and that a golden and real opportunity to think "out of the box" on a much broader basis in the development of a radical plan for the village has been missed. Broader infrastructural issues must merit and surely demand detailed and objective analysis within the overall planning process and how the variety of retained agencies in this process appear not to have contributed to these matters is hard to comprehend. We trust that the above thoughts will be given reasonable and principled consideration and further, we trust that they will be borne in mind with diligence and objectivity as the next stage of the process evolves.

- **Sent on:** 2 March, 2018

R16

- **Message Details:**
  -
    - **Name**
    - **Email**
    - **Subject** Neighbourhood Plan Response
    - **Message** First may I congratulate team on this document. I am all too aware of its history. It is well presented and argued. My only major point relates to sequencing of developments. The traffic pinch point at the primary school is a major issue. It has high risk potential for a serious road accident with children involved. The development plans for a rear entrance to the school (D) must have the highest priority over all other developments because all of those others will only add to the risks through more traffic/ more families dropping off children by car or on foot at the current pinch point .My fear is that the developments to the rear of the school are those most likely to require public funds rather than totally paid by the site developer and therefore the least likely to happen without the strongest commitment from County or District Council. I believe that the Parish Council should set out clearly that priority in the plan and must resist all other development options until the primary school access pinch point is permanently removed.
- **Sent on:** 2 March, 2018

L03/X03

Further to the regulation 14 consultation of the Stradbroke Neighbourhood Development Plan, please find enclosed representations on behalf of our clients, comprising letter dated 02.03.18 and drwg no. 402902-30-100 –Conceptual Masterplan.
I would be very grateful if in due course you could confirm receipt of the attached representation.
If you have any questions please don't hesitate to contact me on 01379 646603.
Kind Regards - **Chris Hobson**, BSc (Hons) MSc MA MRTPI Principal Planner

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DURRANTS
SINCE 1853

Our Ref: CH/AW/301177 2nd March 2018
Your Ref:

By email: stradbrokepc@outlook.com

The Clerk,
Stradbroke Parish Council,
Mill HIll House
Church Lane
Wickham Skeith
Suffolk
IP23 8NA

Dear Sirs, Madams,

Consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended

Site: Land to the east of Queen Street, (North of Shelton Hill) Stradbroke – Site (12) Representations

We write further to the Councils Regulation 14 consultation with respect to the Stradbroke Neighbourhood Development Plan and in particular reference to the above site adjacent to the permitted development site at Grove Farm, Stradbroke.

This site is referred to as site NP 12 (new) in the AECOM Site Allocation report dated September 2017 (SD07) and identified in the Neighbourhood Plan Working Groups Site Allocation report (SD21).

We can confirm that the site has been put forward to Babergh Mid Suffolk District Council as a suitable, available and achievable site as part of the emerging Local Plan and during the Regulation 18 consultation in 2017. It is our strong contention that the site represents a suitable opportunity for future residential development in Stradbroke and delivers many of the objectives set out in the draft Neighbourhood Development Plan. The site should therefore be reassessed having regard to updated evidence hereby presented and considered for allocation in the Stradbroke Neighbourhood Development Plan. This representation should be read alongside drawing no. 402902-30-100-Conceptual Masterplan hereby attached.

Suitability

We would reiterate that the site is suitable for residential development being located centrally in the village of Stradbroke which is identified as a Core Village within the recent review of settlements and its relative place in settlement hierarchy. The site abuts residential areas to the south and planning permission (reference 4005/14) exists for residential development of 44 dwellings immediately to the north of the site. The proposed site would therefore represent a logical extension to the village being in close proximity to the centre and its various amenities to the south. There are no insurmountable technical or environmental constraints to the site's development and therefore we conclude it represents a suitable site for inclusion in the Stradbroke Neighbourhood Development Plan.

Whilst we agree with a number of the assessments made by AECOM in their analysis of the site during the site allocation search and assessment process, we would highlight that the site should also be considered in light of the evidence contained within this representation. We note that the site assessment proforma in the AECOM report of September 2017, highlights that access can indeed be taken from the permitted Grove Farm site but that the ownership is unclear and that delivery of both sites may exceed the maximum number of dwellings allowed off a single access.

However, as set out in the attached conceptual masterplan and vision, the site could accommodate 58 dwellings at an appropriate density and with access provided off Queen Street via the permitted site at Grove Farm. The permitted scheme (reference no.4005/14) has since been amended under planning permission reference 3774/16 to allow 2 dwellings to be accessed and served directly from Queen Street. As a result, the number of dwellings on the permitted Grove Farm site that would be served from the new access road would be 42. The combined total from the two sites of 100 would therefore accord with Suffolk County Council design brief and Manual For Streets guidance. This is therefore not a constraint on development of this site.

Availability

With respect to availability, it is important to note that our clients currently own both this site and the adjoining site at Grove Farm that benefits from planning permission (reference 4005/14). The site with permission is currently in an advanced stage of sale to a developer with the matter being processed by solicitors. The same developer is taking the subject site (site 12) through the plan process with a view to development on this site as an extension to the existing permitted site at Grove Farm. There will therefore be a mechanism for delivering both sites and there are no known legal restrictions to prevent the development being brought forward in the short term and the immediate delivery of new homes.

Achievability

Having undertaken an initial scoping and contextual appraisal we have prepared a conceptual masterplan for how the site may come forward. This demonstrates that the site could reasonably accommodate between 50 and 60 dwellings. This is provided at a low density appropriate to the surrounding context whilst also providing for substantial areas of open space and landscape buffers to the perimeters. As noted above, access could be achieved through the existing permitted site and therefore contrary to the conclusions of the Neighbourhood Plan evidence base this is not a constraint on development of this site, and this site could be delivered in tandem with the existing permitted site.

Deliverability and Viability

As set out above, negotiations have since progressed between the current land owners and prospective developers that would allow this site to be brought forward along with the already permitted site at Grove Farm. This would remove any potential access and ransom strip issues referred to in the reports that have formed the evidence base of the Neighbourhood Plan. The presence of an existing permission on the adjoining site is of significant benefit to developers and assists in securing the necessary investment. The subject site could be brought forward with this already permitted site as part of a larger phased development which will both help to reduce risk to developers and also benefit from the various economies of scale achievable on a site of this size. This will enhance the overall deliverability and viability of the site.

The Vision

We hereby attach a conceptual masterplan which sets out a vision for the future site allocation and demonstrates what can reasonably be achieved and delivered at the site. Important aspects within the masterplan to note include:

- Provision of 58 dwellings (22 dwellings per hectare (dph)) that would provide a mix of detached and semi-detached bungalows, two storey houses with a mix of 2, 3 and 4 bedroom dwellings.
- Provision of market housing, policy compliant affordable housing, and starter homes.
- Landscape buffers to south and west boundaries.
- Public open space and surface water drainage infrastructure to the east.

In terms of access it is proposed to utilise the permitted route through the adjacent development site to the north-west. A highway to adoptable standards would provide pavements either side with pedestrian connections potentially to residential areas to the south. As set out above the combined number of dwellings would not exceed that allowed off a single access point. Retention of a landscape zone to the west boundary as indicated would provide a buffer in the interests of preserving and enhancing the setting to the listed buildings to the west (the Hall and the Barn for conversion). The conceptual masterplan also retains the mature belt of trees running along the southern boundary of the site which form a prominent landscape feature adjacent to the

Stradbroke Conservation Area. The conceptual masterplan also makes provision for open space and drainage infrastructure towards the eastern boundary which would allow for a soft edge to the open countryside beyond.

It is considered that the development provides additional assurance to the Parish Council that the allocation of this site for future housing is both achievable and deliverable, and that the growth and needs of the local community can be adequately managed within the emerging plan in a central and well located site that would avoid further elongated spread of the village. More importantly the site would meet the following objectives of the draft Neighbourhood Plan, PL2 (Built Environment), PL3 (Transport and Movement), PL5 (Design), PE1 (Education), and PE5 (Housing).

In being able to deliver a mix of size, type and tenure of new dwellings in a sustainable location we feel that such a scheme represents sustainable development and the site makes a significant contribution in meeting the settlements housing allocation. We would also highlight that the attached masterplan accords with the options put forward in the Stradbroke Neighbourhood Masterplanning Final Report dated November 2017 (AECOM).

Settlement Character / Morphology and Landscape

This site also has a number of relative benefits when considered against other sites, in respect of the settlement pattern and the overall character of the village, and impacts on the surrounding rural landscape and countryside The site is located centrally within the village and therefore this site coming forward would avoid the further elongation and spread of the village outwards into the open countryside. This avoids an ever increasing distance to facilities in the village and the more immediate visual impacts associated with the loss of more prominent and open agricultural land on the edges of the village.

The site also represents a logical ‘in-fill’ in comparison to other sites allocated in the draft plan. As a result of the site being enclosed on 3 sides by the existing village the visual impacts would be significantly less in comparison to the sites put forward. Both short and long distance views of the site are limited due to the site being well screened from Queen Street to the east by existing and future development, or mature vegetation and from existing residential areas to the south and north by the existing built form and mature belts of trees.

Sustainability

As noted by the AECOM Site Assessment report of September 2017, the site is well located being in close proximity to the village centre and its facilities and amenities. There are also opportunities to open up pedestrian routes to the north and south and create links to the remainder of the village. Whilst the Neighbourhood Plan highlights concerns regarding existing congestion and the impacts of additional traffic along Queen Street, one of the inherent benefits of this site is the short walking distance to the school, and the shops along Queen Street, Church Street and New Street and bus stops which would encourage walking and cycling and limit the number of car trips and vehicles on the road. A benefit not achieved on other allocated sites in the Neighbourhood Plan that are

located in more peripheral locations. Indeed this site would meet one of the objectives of the Neighbourhood Plan which is to enable more children to be able to walk and cycle to school.

Site Allocation Assessment

Having regard to the above, we would disagree with the assessment and score given to the subject site in the determination of appropriate sites for allocation carried out by the Neighbourhood Plan Working Group and therefore subsequently the conclusions and recommendations of the Site Allocation Reports (SD21). We consider the scoring for this site to be unreasonable and having regard to the content of this representation calculate that a score of 18 is more accurate for the subject site. This is in line with those other sites included for allocation in the Neighbourhood Plan, which score either 17 or 19. A review of the subject sites appraisal against that within the Neighbourhood Plan evidence base is set out below.

Criteria	**Justification**	**Score NPWG**	**Score (Durrants)**
1.The Owner/s has/have full development control of the whole development site, and could in theory "start on site" tomorrow. Reason: to guard against a stalled site and achieve sustainable growth	As set out in this representation the subject site is being put forward as part of the plan process by a developer who is in the advanced stages of sale of the adjoining site with the a view that this site be developed as an extension of the permitted development at Grove Farm.	1	**2**
2. The site helps to maintain the crossroad layout as the village focal point Reason: to maintain social cohesion and preserve the conservation area as a focus of the village in accordance with the Village Design Statement	Agreed	3	**3**
3. The site is well connected to the village centre, or is capable of design to create good pedestrian and cycle/mobility connection. Reason: to assist those with mobility needs including the elderly, those of limited mobility and parents with young children to access central village services	Agreed	3	**3**
4. The site can mitigate manage or reduce car dependency, and promote pedestrian and cycle use Reason: to promote green economy, encourage recreation and heathy living and promote the environment	Agreed	2	**2**

5. The site has a low impact on the established Queen Street bottleneck or can help reduce its impact Reason: to encourage pedestrian travel to the school, assist through traffic at rush hour, help lower air and noise pollution levels in Queen Street and encourage further site use and growth.	Acknowledge that there would be an impact on Queen Street. However, trips to and from school largely to be via foot or cycle given the proximity of the site to the primary school. Close proximity to centre of the village and its amenities further encourage travel on foot. Not considered significantly more detrimental than alternative sites that would engender car dependency given their location and that scored 2.	1	**2**
6. The site is capable of evidencing positive viability especially by means of efficient infrastructure costs. Reason: to improve land value for promotion, encourage site delivery/ development and ensure it can afford contribution to community priorities	The site would be brought forward as part of a larger development that would be phased and as a result benefit from the economies of scale derived from a larger development, in terms of build costs; labour; materials; marketing; obtaining finance; professional fees. The site would also benefit from the associated utilities and infrastructure of the adjacent permitted site, therefore substantially reducing one off costs incurred from stand alone sites. The proportionate costs would therefore be significantly reduced, and development viability enhanced.	1	**3**
7. The site assists or can be designed to assist the primary and secondary schools (by providing a range of housing) to develop and grow their services either by way of positive contribution from viability or by other means Reason; to preserve and grow the range of education services available to a growing population	Agreed	2	**2**
8. The site does not rely on open drainage as a means of surface water control unless that open water can be adopted by Utility company or maintained at no cost to parish or estate residents. Reasons: to ensure full range of affordable housing can be provided though limiting service charging, to prevent the village crossroads design being unbalanced by multiple open water drainage ponds	The indicative concept allows for sufficient space for surface water drainage to be dealt with via differing options within the site. The proposals indicate potential swales but these are not conclusive and alternative drainage designs could be incorporated to meet the specific requirements of utility companies. Individual soakaways to be incorporated into each plot.	0	**1**
Total Score		**13**	**18**

Summary and Conclusions

For the above reasons the site therefore represents a suitable, available and achievable site that is well located and within close proximity to the core services and facilities within the village of Stradbroke. The delivery of this site would accord with the objectives set out within the draft Neighbourhood Plan, and also avoid a number of detrimental impacts necessitated from development of other sites that have been put forward and allocated for development in the draft Neighbourhood Plan.

As noted above discussions are advanced with respect to a developer taking forward this site along with the adjacent permitted development site to the northwest. The issue raised within the Neighbourhood Plan evidence base with respect to access has been overcome. An access has been identified through the adjoining site at Grove Farm that already benefits from planning permission. Based on its merits the site should be allocated in the Stradbroke Neighbourhood Development Plan for residential development.

Should the Neighbourhood Plan Working Group and Parish Council still determine that the site should not be allocated in the Neighbourhood Plan, we would request that the site be included as a 'buffer site' as recommended by the groups advisers AECOM in their Site Assessment report dated September 2017. We note that the final paragraph of section 3.1 on page 21 of the report states:

"It is recommended that a 'buffer' of housing supply is provided, which may be one or two sites allocated as contingency housing sites. These could be developed if the allocated sites do not progress as expected."

We therefore respectfully request that the above be considered further in the emerging Stradbroke Neighbourhood Development Plan. Please contact us should clarification be required on any point

Yours faithfully

Christopher Hobson BSc (Hons) MSc MA MRTPI

Principal Planner

Building Consultancy Department

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SITE PLAN

Scale 1:250

10m 0 10 20 30 40 50 60 70

AREA AND DWELLING SCHEDULE		
KEY	AREA (ac)	No. of Dwellings
	1.145	18
	0.626	10
	0.456	8
	1.241	22

DRAWING NOTE
- This drawing must not be reissued, loaned or copied without the written consent of Durrants.
- All errors, omissions, discrepancies should be reported to Durrants immediately.
- All dimensions to be checked before site fabrication by the contractor, his sub-contractor or supplier.
- Any deviation from the drawing to be reported to Durrants immediately.
- **This drawing is only to be used for the purpose identified in the boxes below.**

DO NOT SCALE FROM DRAWING

CDM 2015 DESIGNER RISK INFORMATION

In addition to the hazards/risks normally associated with the type of construction work detailed on this drawing which a competent contractor should be able to control using normal good practice and procedures.
NOTE THE FOLLOWING UNUSUAL AND EXTRAORDINARY RISKS TO HEALTH AND SAFETY:-

CONSTRUCTION

MAINTENANCE/CLEANING

DECOMMISSIONING/DEMOLITION

Further Information can be found on designer risk assessment number / document ref:-

It is assumed that all works will be carried out by a contractor competent under CDM 2015 working to an approved method statement and that unless otherwise advised a principle designer has been appointed

Rev.	Date	Details	Drawn	Checked

Issued for:

INFORMATION

Client/Project:
HILLEN
MID-SUFFOLK
CALL FOR SITES

Drawing Title:
QUEEN STREET, STRADBROKE
IP21 5HH
PROPOSED DEVELOPMENT PLAN

Drawn:	Checked:	Size:	Scale:	Date:
TK	CH	A3	1:1250	NOV 2017
Project No.		Drawing No.		Revision:
402902		30-100		-

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DURRANTS SINCE 1853

S08

Planning for Growth

By e-mail
Ms Odile Wladon
Clerk
Stradbroke Parish Council

Plse ask for:	Paul Bryant
Our email:	Communityplanning@baberghmidsuffolk.gov.uk
Our direct line:	01449 724771
Our fax no:	
Our ref:	
Your ref:	

Date: 2 March 2018

Dear Odile

STRADBROKE NEIGHBOURHOOD PLAN 2016 - 2036: Regulation 14 Pre-Submission Draft

Thank you for consulting the Council on the Pre-Submission Draft version of the Stradbroke Neighbourhood Plan.

We have worked closely with both yourselves and the consultancy appointed by the Working Group to help prepare this plan over the last few months and are pleased to see that many of the comments we made on an earlier draft have been taken on board. Consequently, we have no further specific or detailed comments to make at this stage.

The Parish Council and Neighbourhood Plan Working Group are reminded that, should they feel it necessary to make substantive changes to the current draft Neighbourhood Plan following the close of this round of public consultation, it may be appropriate for them to re-consult on the revised document for the required period prior to formally submitting the Stradbroke Neighbourhood Plan to Mid Suffolk.

We have just one minor observation to make. On page 4 (Table of Contents), it may be helpful to include page reference numbers to both the 'List of Policies' and 'List of Maps'. On a similar note, you may also wish to include a table showing a list of 'Figures' that appear in the Plan - in particular, the indicative concept plans that appear as Figures 2 - 5.

We will continue to work closely with you, and advise you as appropriate, as the Plan progresses to the next stages.

Yours sincerely

Paul Bryant

(Interim) Spatial Planning Policy Officer | Planning for Growth
Babergh & Mid Suffolk District Councils - Working Together

cc: Robert Hobbs (Corporate Manager - Spatial Planning)

STRADBROKE NEIGHBOURHOOD PLAN

REGULATION 14 REPRESENTATIONS & RESPONSES

R= Resident
L = Landowner
S = Statutory consultee
X = Other organisations or companies

Date Rec.	ID	Response	Action Required/Taken
20/1/18	R01	There is only one new site off Queen St, the other already has planning permission. All information available was carefully examined before the working party made recommendations to Parish Council.	None
22/1/18	R02	Thank you for your support. MSDC will still be the planning authority but will have to refer to policies, including site allocations, within the Neighbourhood Plan.	Comments noted.
22/1/18	R03	Thank you for your comments. Until a site is submitted for planning approval the precise borders will not be known.	Note added to Plan to state the drawings and maps are for illustrative purposes only and may not be to scale.
22/1/18	L01	Thank you for your support of the plan. The concept maps were used for illustrative purposes. It is the preferred intention that each new development within Stradbroke should enhance, at a minimum, the footpath network where possible.	Note added to Plan to state the drawings and maps are for illustrative purposes only and may not be to scale.
7/2/18	S01	Thank you for the points raised. Map of 69 listings is included in SEA documentation that supports the Neighbourhood Plan.	Section 3 now includes a sentence concerning Conservation Area Appraisal with an additional bullet point added to STRAD1. The wording of the paragraph supporting STRAD12 has been reviewed with wording strengthened.
7/2/18	S02	Thank you for the points raised.	Heritage will be replaced with Historic Environment. As above, Section 3 now includes a sentence concerning Conservation Area Appraisal with an additional bullet point

			added to STRAD1. Section 5 now contains reference to listed buildings and energy efficiency requirements. STRAD12 has been reviewed to cover archaeology. Glossary updated to include Historic Environment.
13/2/18	R04	Thank you for your comments. Please refer to Traffic Survey (SD03) and letter from SCC S07 above. No land has been made available at the present time for a car park other than that already noted in the plan. Any changes made to highways, including parking restrictions, in Stradbroke would be subject to a Traffic Regulation Order which includes extensive public consultation.	Concept plan revised to remove "parking restrictions".
13/2/18	R05	Thank you for your comments in support of the plan.	Comments noted.
16/2/18	R06	Thank you for your comments. A skate park has been discussed as an option and was inadvertently omitted from the draft document. Following discussions with the Safer Neighbourhood Policing Team as suitable location for a skate park has yet to be identified, this will be reviewed alongside the work already undertaken by the Parish Council when a skate park was previously investigated.	Skate park to be added to CIL priorities with the proviso that it is subject to a suitable location being identified and reference made to previous work undertaken.
18/2/18	R07	Thank you for taking the time to write with your comments. We refer you to the Traffic Survey (SD03) and letter from SCC S07 above and the site allocation report SD08. Site D contains a variety of housing types. The Plan is keen to support starter homes for young families which are affordable and are built at a higher density. The pre-school building is in need of replacement. A buffer between the existing dwellings and new would create separation not inclusion.	Comments noted.
19/2/18	R08	Thank you for taking the time to comment. The comments you make apply to the Masterplanning document developed by AECOM. This is a document that was used as evidence when assessing sites – the sites you mention are not included in the plan.	None.
22/2/18	R09	Thank you for your questions: STRAD2: MSDC are the planning authority but the Neighbourhood Plan will	STRAD2 relevant bullet point rewritten

		guide planning in Stradbroke. We see that the bullet point needs rewriting. A buffer between the existing dwellings and new would create separation not inclusion. Please refer HNS executive summary (Consultation Statement Appendix C) MSDC are the planning authority however PC will scrutinise all planning applications Flooding will be separated into its own policy as per SCC comment (S07) above. The Parish Council have no control over where any individual in Stradbroke parks. Footpath would be expensive and a buffer by default. Other matters will be discussed with the developer/landowner once a planning application is submitted for the site.	
23/2/18	R10	Thank you for your support. AECOM have undertaken a traffic survey which shows that the roads and the junction have capacity (SD03). We take on board your point concerning informing the public that development will happen with or without a plan – the plan will enable SPC to guide the development. We will ensure more communication takes place.	FAQs in Stradbroke Monthly and on PC Website. Working party will increase public engagement.
24/2/18	R11	Thank you for your comments. The concept maps were for illustrative purposes and the map has been reworked to remove the additional vehicular access. Apologies for the confusion this has caused. A skate park has been discussed as an option and was inadvertently omitted from the draft document. Following discussions with the Safer Neighbourhood Policing Team as suitable location for a skate park has yet to be identified, this will be reviewed alongside the work already undertaken by the Parish Council when a skate park was previously investigated.	Review concept plan illustration Skate park to be added to CIL priorities with the proviso that it is subject to a suitable location being identified and reference made to previous work undertaken.
27/2/18	R12	Thank you for your comments. The site you refer was included in the Masterplanning document which was used to assist in the selection of the final sites included in the plan. The site you refer to has not been included in the plan.	None.
27/2/18	S03	Thank you for the points raised	STRAD4 has been amended accordingly

27/2/18	S04	Thank you for your comments.	Comments noted.
28/2/18	R13	Thank you for taking the time to submit a comprehensive representation. • We refer you to the following documents: Consultation Statement and its appendices F, H and I alongside the Neighbourhood Plan SD08. In addition we refer you to Page 1 of SD01 and to the October consultation pages on the Parish Council's website which can be accessed via the Committees & Working Parties page. (www.stradbrokepc.org) • The Village Design Statement update was produced by the Chair and Vice Chair of the Parish Council and adopted unanimously at the Full Parish Council Meeting on 11th June 2012 – apologies the draft contained a typing error and identified it as 2014. The VDS has been a vital document used as reference and a supporting document by members of the working group in all stages of the preparation of the plan from 2015 to date. • Communications between the working group members and landowners have taken place since the inception of the plan. • Infrastructure – thank you for this helpful comment. Improvements to mobile and broadband was identified in Objective PL1. • There is a full consultation process required before Assets of Community Value are designated. • All other comments are noted. We would like to take this opportunity to thank you for the time and effort you contributed to the work on the plan in its early stages	Typing error corrected now reads 2012. Broadband and mobile connectivity have been added to Community Actions.
28/2/18	S05	It is the hope that the sites, once brought forward, will enhance at least the footpath network around the village. The Blue environment will be addressed with the changes proposed above to the utilities policy and flood policy.	Comments noted. Reference to Chickering Bec will be added to Policy STRAD16
28/2/18	S06	Thank you for your comments. We have been in touch with the CCG throughout the preparation of this plan and appreciate the offer to now work with us in planning for the future.	Comments noted.
01/3/18	X01	Thank you for taking the time to comment on the draft plan. STRAD1: Infrastructure constraints on development led us to use site allocations to balance the growth in the village. STRAD3: The final sentence states that alternatives may be considered if	Comments noted.

		sufficient evidence supplied. We refer you to section 12 of the plan – monitoring and delivery. We note the rest of your comments.	
01/3/18	R14	Thank you for your comments. The development of the site will be the responsibility of the developer and landowner. MSDC will still be the planning authority but the Plan will provide a supporting document to the Local Plan adopted by MSDC. The SNP covers the period 2016-2036 and has sites included that provide sufficient housing to satisfy the needs of the Parish in accordance with guidance supplied by MSDC. It will be reviewed at a minimum every 5 years. The plan contains policies which will support the infrastructure in the village alongside the development.	Comments noted.
02/3/18	X02	Thank you for your support and comments.	Comments noted.
02/3/18	L02	Thank you for your comments which are noted. All sites were assessed using the set criteria. A proposal was put to the Parish Council on sites to be included and this was accepted by majority vote.	Comments noted.
02/3/18	S07	Thank you for your comprehensive response. Flooding will be separated into its own policy as per SCC comment (S07) above. Changes will be made to the plan to reflect your suggestions alongside those comments received from S01 and S02. Your comments re access to sites are noted.	Flood policy added Archaeology comments to site policies added. STRAD8, STRAD9 & STRAD14 updated Parking policy amended to reflect Suffolk guidance.
02/3/18	R15	Thank you for your comments. We noted them after the initial October 2017 consultation and note them again. Suffolk County Council have confirmed that there is sufficient capacity at both of the schools in Stradbroke to cater for the density of housing proposed. We refer you to the Traffic Survey (SD03).	Comments noted.
02/3/18	R16	Thank you for your comments and support. The sequence of developments will be dependent on when landowners/developers bring their sites forward. Any developer contributions needed from sites will be fully assessed when applications are submitted to MSDC.	Comments noted.
02/3/18	L03/ X03	Thank you for your comprehensive response. Attempts were made to contact all landowners at every stage in the production	Comments noted.

		of the plan. The working party reached decisions on all sites collectively not one site subjectively (see SD07), the Parish Council then ratified their conclusions. The plan contains a robust review and monitoring process - see section 12 of the plan. The NP and its proposed allocations is contributing fully to Mid Suffolk's objectively assessed housing need. At the appropriate time, the Plan will be reviewed and it may be necessary to allocate further sites if the need changes. However, it will be necessary to review options and alternatives at that time and, for example, to go through a fresh Call for Sites so that all sites can be considered with the most up-to-date information to hand.	
02/3/18	S08	Thank you for your comments.	Page numbers added to map/figure index.