

Responses received to Pre-Submission Consultation, Responses to Comments and Proposed Changes

The tables in this appendix set out the comments that were received during the Pre-Submission Consultation Stage and the responses and changes made to the Plan as a result of the comments. The table is laid out in Plan order with the general comments following the comments on the policies. Where proposed changes to the Plan are identified, they relate to the Pre-Submission Draft Plan. Due to deletions and additions to the Plan, they may not correlate to the paragraph or policy numbers in the Submission version of the Plan.

Name	Organisation	Comment	Parish Council Response	Proposed Changes
Sections 1, 2 and 3 comments				
B Hunt	-	South of the village is already being over developed. The original heritage north side of the village should remain untouched .	Noted	None
S Marquess	-	Chapter 2, paragraph 2.14 Volume of traffic/speed/parking: Traffic/parking along Church Lane is a nightmare during the Primary School runs! Perhaps if traffic were controlled more could walk safely to/fro school?	Noted	None
C Fuller	-	<p>Ch1 para 13 - The terms 'conserve' and 'enhance' are more appropriate than 'protect' and 'preserve' when considering the needs of the charm and unique character of the parish.</p> <p>Ch3 para3.2 - The NPPF defines sustainable development as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'. The consistently expressed concerns of residents (notably High Street) about lack of pedestrian safety; traffic volume/HGV usage clearly shows that the current scale of development within the surrounding area significantly adversely impacts on residents, thus the present needs are not being met. The proposed imposition of a minimum of 1514 new homes plus additional intensification of residential & employment development in the vicinity of sproughton will only serve to bring further and higher traffic volumes; more necessary diversions of HGV A14 traffic; reduced Air Quality: increased Noise pollution and increased health & safety risks to pedestrians and residents of high street, sproughton. The 'well being' of future residents and visitors to sproughton is therefore being compromised by the imposition of an</p>	<p>Noted</p> <p>Noted</p> <p>The neighbourhood plan cannot stop Babergh DC planning for strategic development of this nature.</p>	None

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		inappropriate scale of development in this locality that will exacerbate the longstanding & well defined impacts (eg Parish Plan) caused by the traffic. Thus by its own definition the current and proposed development for Sproughton cannot be regarded as sustainable development because it doesn't meet the needs of the present and will compromise the ability of future to meet their own needs (which fundamentally meets good wellbeing and high quality of life). The COP26 has clearly identified that unsustainable development is a collective concern and local people need to challenge plans that will erode environmental quality - this plan should seek to do this.		
S Maxwell	-	I would say in 3.7 Sproughton is a Hinterland village and not a Core village because it has little amenities, ie shops, supermarkets, post office as Bramford has.	Noted. The neighbourhood plan has to conform with the strategic policies of the Local Plan, where the village is defines as a Core Village	None
S Lavington	-	Page 10, para. 2.3, History. Should mention that the B1113 (High Street) follows the route of Iter IX, the Roman road from Colchester to Caister-by-Norwich. Of interest is the fact that the Sproughton field boundaries generally align perpendicular to the River Gipping and were laid down prior to the arrival of the Roman road. One consequence of this can be seen in the southern boundary wall to number 46 High Street, which follows an ancient field boundary and therefore does not align with more recent houses whose boundaries are perpendicular to High Street (the Roman road).	Noted	None
S Catermole	-	I do not agree with the minimum housing requirement allocated for Sproughton of 1514 new homes. The reasons are shown in Para 2.16 which i agree with. There are safety issues for the pedestrians. Understand the JLP has minimum housing requirements.	Noted	None
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No. National Planning Practice Guidance (PPG) is clear at Reference ID: 41-009 that where a Neighbourhood Plan is brought	Noted	None

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		<p>forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in: the emerging Neighbourhood Plan; the emerging Local Plan; and the adopted Development Plan. It notes that it is particularly important for any issues to be resolved to ensure the draft Neighbourhood Plan has the greatest chance of success at independent examination.</p> <p>In this context, we support the inclusion of the following contextual statements in Chapter 1 of the Neighbourhood Plan:</p> <ul style="list-style-type: none"> - Paragraph 1.5 sets out that the Neighbourhood Plan cannot go against the strategic policies of the Joint Local Plan or stop development that already has planning permission. - Paragraph 1.10 recognises that the Neighbourhood Plan cannot contradict the strategic policies and site allocations in the emerging Local Plan. <p>Despite this recognition of the importance of not contradicting the emerging Local Plan, the remainder of the Neighbourhood Plan clearly sets out to contradict the emerging Local Plan with respect to the proposed allocation of Land east of Lorraine Way (JLP Policy LA116).</p> <p>For example, at Paragraph 3.8 the Neighbourhood Plan states:</p> <p>“one of the sites [i.e. Policy LA116] was refused planning permission by the district council in 2020 and a subsequent appeal was dismissed by the Secretary of State. It remains to be seen whether this allocation, which is not supported in the Neighbourhood Plan, survives the examination of the Joint Local Plan.”</p> <p>This statement clearly contradicts the emerging Local Plan which continues to allocate the site for development in full</p>	<p>Noted</p> <p>In December 2021 the Local Plan Inspectors issued a note to the District Council recommending that all new allocations in the Joint Local Plan (including the site at Lorraine Way) be deleted and that Settlement Boundaries revert to those in the adopted Local Plan. As such, the Neighbourhood Plan is not in contradiction with the Joint Local Plan.</p>	<p>None</p> <p>None</p>

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		<p>knowledge of the appeal decision. The District Council has reviewed the appeal decision and has presented detailed further evidence to demonstrate the acceptability of the site allocation on heritage grounds. The Neighbourhood Plan's decision not to support the site allocation therefore directly contradicts the emerging Local Plan. We object to paragraph 3.8 for this reason and consider that the inclusion of this statement renders the Neighbourhood Plan contrary to the PPG and it would therefore not meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.</p>		
	<p>Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust</p>	<p>The SNP correctly identifies that the development plan consists of the adopted Core Strategy and the 'saved policies' of the 2006 Babergh Local Plan. However, the SNP notes that the current strategic planning framework for Sproughton is likely to be replaced by the emerging Joint Local Plan (JLP) in the near future.</p> <p>As such, the SNP gives significant regard to the content of the JLP, including the proposed allocations and settlement boundaries contained within the emerging JLP. Given the advanced stage of preparation of the JLP, this is an appropriate approach for the SNP to adopt and one which Pigeon and the Trust fully support.</p>	<p>Noted</p>	<p>None</p>
	<p>Boyer on behalf of Taylor Wimpey UK Ltd</p>	<p>2.2 Paragraph 1.10 of the Pre-submission SNP acknowledges that it cannot contradict the strategic policies and site allocations in the emerging Local Plan and we fully support this statement, which aligns with Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).</p> <p>2.3 As identified in this Section, however, it is clear that the Pre-submission SNP does contradict the strategic policies and site allocations in the Draft JLP.</p>	<p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p>

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		<p>2.4 Paragraph 1.12 states that the current adopted Babergh Local Plan Core Strategy, provides a framework for the period to 2036. This statement is incorrect, the adopted Core Strategy provides a framework to 2031.</p> <p>2.5 We disagree with Paragraph 1.17, which states “The Plan has been developed through extensive community consultation and is based on sound research and evidence.” We have fundamental concerns with regards to the Landscape evidence and site assessment work and their methodologies that support this Pre-submission SNP, as they clearly conflict and undermine the Draft JLP evidence base. Our concerns are set out in detail in the proceeding section.</p> <p>2.6 We do not disagree with Chapters 2 and 3, however it should be acknowledged that the recent pause to the Draft JLP Examination may need to be considered in terms of timescales for the Pre-submission SNP production.</p>	<p>The paragraph will be amended</p> <p>Noted</p> <p>Given the recent decisions by the Local Plan Inspectors, there is no reason to halt the submission of the Neighbourhood Plan.</p>	<p>Amend Para 1.12</p> <p>None</p> <p>None</p>
	Ipswich Borough Council	<p>It is noted in the foreword and at paragraph 1.12 that reference is made to the Neighbourhood Plan covering the period to 2036. However, it is clear from the title page and the vision in Chapter 4 that the intended plan period is to 2037. It is assumed for the purposes of this response that the plan period is to 2037 so that it matches the plan period set out in the emerging Babergh & Mid Suffolk Joint Local Plan (JLP) but this should be clarified for completeness. Should there be any changes to the period that the B&MS JLP covers then consideration should be given to the timescales set.</p> <p>Step 2 of neighbourhood planning (gathering the research and information baseline), should in addition to consulting those who live and work in the area should also include those with an interest in or are affected by the proposals and this should also include landowners. I am not aware that the Council as the</p>	<p>The foreword will be amended to refer to 2037 as the end date.</p> <p>The Borough Council has been made aware of the Plan at the Pre-Submission stage and has been afforded the opportunity to comment.</p>	<p>Amend the Foreword</p> <p>None</p>

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		<p>owner of Sproughton Enterprise Park (also known as Eastern Gateway) was involved at this stage which it should have been.</p> <p>Chapter 3 Chapter 3 sets out the planning policy context of the Neighbourhood Plan area. It is requested that a short paragraph be included to highlight the current position in terms of planning policy in Ipswich Borough in terms of the adopted and emerging Local Plans. The adopted 2017 Local Plan and the emerging Ipswich Local Plan which is awaiting the Inspectors report following the Main Modifications public consultation. This is because of the close geographical and functional relationship between the Borough and Sproughton.</p>	<p>The Neighbourhood Pan does not cover Ipswich Borough and so this would only serve to confuse users of the Plan.</p>	<p>None</p>
	<p>Suffolk County Council</p>	<p>In terms of paragraph 2.14, SCC as The Highway Authority is aware of the traffic issues in the village and any measures to improve highway safety and reduce congestion are fully supported and will be procured through development wherever possible. Potential changes to signal timing at key junctions are being considered to discourage rat-running issues along B1113.</p>	<p>Noted</p>	<p>None</p>
	<p>Babergh District Council</p>	<p>Foreword, Para 1.12 The plan period end dates should read 2037.</p> <p>Para 1.6 Drop 'th' from 26 February 2020 so the date format is consistent with rest of the Plan</p> <p>Para 1.19 "... which are published" instead of "... which is published..."</p> <p>Para 2.11 The quoted percentages don't quite match the pie chart below.</p>	<p>The foreword will be amended to refer to 2037 as the end date.</p> <p>Para 1.6 will be amended.</p> <p>Para 1.19 will be amended.</p> <p>Para 2.11 will be reviewed</p>	<p>Amendments to be inserted here</p>

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Vision Comments				
V Durrant	If applicable	The Vision and resulting Objectives are fully supported. The Development Design paras (14-16) and Infrastructure paras (17-19) are important for ensuring the character of the village are maintained and supporting facilities further developed. The Transport Objectives support the vision successfully but it is especially important that the objectives of para 23 are robustly supported and maintained by the developers to ensure the amenity and safety of residents.	Noted	None
J Webb	-	The Wall around (& its two bells must be preserved) the Old Rectory P15 built by William Mee.	Noted	None
C Fuller	-	<p>Vision - This text could be beneficially adjusted as follows: In 2037 Sproughton will be a thriving safe parish that will have met the requirements of sustainable development ensuring the special character, historic landscape & environment has been conserved and enhanced for the benefit of residents, visitors and sproughton businesses.</p> <p>2- 4.2 Housing Objectives - Need to revise the objective text 'To maintain a residential community that can experience a high quality of life.</p> <p>Natural Env't Objectives - 8 - Need to revise the objectives text 'To conserve and enhance ... '</p> <p>Add text - To ensure water, soil, noise, light and air quality meets appropriate environmental standards.</p> <p>Business & Employment Objectives - 4 - Need to revise the objective text 'To encourage the provision of appropriate servicesdevelopment.</p> <p>Development design - 14 - Need to revise the objective text 'To ensure new buildings either avoid, mitigate or compensate for environmental impact where necessary to ensure a net environmental gain is delivered.</p> <p>Transport objectives - 23 - Need to revise the objectives text 'To address the impact of traffic through the village and ensure any future development within or affecting the parish adequately addresses these impacts alone and in combination with other</p>	Noted. It is not considered necessary to amend the Vision and Objectives	None

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		developments consistent with sustainable development principles and environmental net gain objectives'		
	Boyer on behalf of Taylor Wimpey UK Ltd	2.7 The Vision and Objectives appear to echo the principles set out within national planning policy though the NPPF (2021), reinforced through the Draft JLP, and are largely supported.	Noted	None
	Ipswich Borough Council	<p>Whilst the Council does not disagree with the intentions behind the list of objectives provided in the Neighbourhood Plan, it is recommended that the 24 objectives are consolidated down to a more focussed number of objectives. This will also make monitoring progress against the objectives easier. For comparison, the emerging Babergh and Mid Suffolk Joint Local Plan has nine objectives and the emerging Ipswich Local Plan has 12 objectives. In light of the smaller geographical scale of the Parish compared to the wider Districts and Borough it would be expected that the quantity of objectives for the neighbourhood plan would be lower than local plan level. As an example, objective No's 21 and 24 could be merged into one objective as cycle routes and sustainable travel modes relate very closely to one another. Consolidating the list of objectives will also aid significantly with the monitoring of these objectives after adoption.</p> <p>On a specific note, it is recommended that objective No.12 is amended to read "To conserve and or enhance the heritage assets and their settings." This complies with national guidance on historic assets.</p> <p>It would also be helpful to include more in the neighbourhood plan regarding the housing objectives covering the measures to improve the community cohesion and integration between the Wolsey Grange sites and the Parish. For example, connecting the rights of way between the Wolsey Grange Site 2 and Sproughton Enterprise Park. Land owned by Ipswich Borough has been safeguarded to help provision of a crossing point over the river to help facilitate this.</p>	Well I did say that there were too many objectives!	
	Babergh District Council	Objective 13 (pg 13 & 45)	Agree. Objective 13 will be amended	

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		Should this read '... historic character <u>of the parish</u> .'? Without the last three words, the objective seems a bit vague.		
Policy SPTN 1 Spatial Strategy				
H Davies	-	It is important that Sproughton does not join up with Ipswich & Bramford becoming a suburb of Ipswich - no to urban sprawl	Noted	None
J Tuppen Davies	-	Sproughton must remain a village and not join up with Bramford, Ipswich or Burstall. Policies should be constructed to achieve this	Noted	None
K Athroll	-	My reason being that you are swamping an area around Hadleigh Road/church lane with housing/traffic congestion which is not suitable.	Noted	None
J Webb	-	No more HUGH white buildings.	Noted	None
P Powell	-	However: Re proposed amendment to Plns examination of JLP by BMSDC SP03(1) SP03(4) Removed; this removes substantial policy requirements for infrastructure, quality of development and development sympathetic with setting/area. SP03(3) that development outside settlement boundaries no longer subject to EXCEPTIONAL circumstances and now only subject to limitations of National Policy. Re: SPTN1 Para3: 'Proposals for development located outside the Settlement Boundary will only be permitted where they are in accordance with national and district level policies'. This needs consideration now as only National policy remains since the amended JLP has by removal or amendment of SP03 removed much district policy relevant to objectives of SPTN1.	Noted	None
C Fuller	-	The text of SPTN1 needs revision to 'The NP area will seek to accommodate development commensurate with sustainable development principles and Sproughton's hierarchy. Settlement boundaries, as defined on the policies map indicates the extent of land that Babergh & Mid Suffolk local plan regards as necessary for local plan district housing targets to be met.'	It is unlikely that such an amendment would survive the independent examination of the Plan.	None

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		<p>The key aim should be to ensure sustainable development is delivered accounting for qualitative & quantitative indicators rather than the local plans minimum quantitative housing targets. This fits better with the governments definition of 'Sustainable Communities are places where people want to live and work now and in the future. They meet the diverse needs of existing and future residents, are sensitive to the environment, and contribute to a high quality of life'.</p>		
J Pateman-Gee		<p>This policy consists of three policies, but is unclear and confusing as explained below. This policy also raises the first overarching considerations in terms of particular word use that needs to be consistent and fully understood throughout all policies. "Development" without any context is a word that represents everything and in planning terms can cover both operation works as well as change of use. It covers commercial, agricultural, industrial and residential development from dwellings to household extensions. The NP needs to be very careful and ensure the context of the word development is understood in respect of the specific policy or it may cover much more than intended. In this first policy please consider if development is meant to be "Housing Development" or otherwise is meant to cover all other aspects of development types as well.</p> <p>Para 1 - The Neighbourhood Plan (NP) area is the area the policies and vision of the entire NP applies to. The Plan area is not the same area as the Settlement Hierarchy. However, essentially this para says the Neighbourhood Plan area (much larger than any of the current and proposed settlement boundaries in the LPA local plan) will take all development that the district decides should go to Sproughton. It is true that the</p>	<p>The suggested amendment is not considered necessary and would result in a policy that is inconsistent with examined and adopted neighbourhood plan policies elsewhere in the District.</p>	None

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		<p>district does dictate the extent of development (be it a focus on housing) that each parish needs to take and this para puts this in a confusing way. So the real question is why is this statement needed at all as it simply tries to describe the mechanics of planning policy.</p> <p>Para 2 - "Settlement Boundaries, as defined on the Policies Map, identify the extent of land which is required to meet the development needs of the parish."</p> <p>Firstly "settlement boundaries" is not defined. It's a common term in planning and therefore it's assumed everyone knows what this is, but it is not clear in the policy or any glossary.</p> <p>Second, this provides that said settlement boundaries will identify the extent of land to meet the development needs of the parish. I have never understood settlement boundaries to identify the extent of land to meet needs. Para 5.3 and 5.4 of the NP that serve to support this policy are more helpful, but do not feature as part of the policy itself. Most of the time developers and the LPA will essentially ignore anything not defined as the policy text. Essentially, settlement boundaries is where development (all types) should be directed, unless the LPA Development Plan or NPPF would otherwise say so.</p> <p>Para 3 - This essentially says proposals for development (all types?) when outside the Settlement Boundary can go ahead if in accordance with national and district level policies. What this fails to say is "and the policies of this Neighbourhood Plan, because otherwise what was the point.</p>		

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		<p>Overall the point of this policy is unclear and does not provide a clear objective. We all know what is it trying to achieve, but I think this needs to be looked at again to get it right.</p> <p>Suggested Wording Change for this policy:</p> <p>The following is respectfully suggested for consideration:-</p> <p><i>All development (with exception of agricultural and householder development) shall be directed to within Settlement Boundaries, as defined on the Policies Map, unless otherwise allowed in principle by national and district level policies adopted and/or the policies of this neighbourhood plan.</i></p>		
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	<p>No.</p> <p>We object to the failure to include Land east of Lorraine Way (JLP Policy LA116) within the settlement boundary.</p> <p>POLICY SPTN 1 – SPATIAL STRATEGY states that:</p> <ol style="list-style-type: none"> 1. The Neighbourhood Plan area will accommodate development commensurate with Sproughton’s position in the district’s Settlement Hierarchy; and 2. Settlement Boundaries, as defined on the Policies Map, identify the extent of land which is required to meet the development needs of the parish. <p>Neither of these statements is factually correct with respect to the emerging Local Plan which identifies Sproughton as a Core Village within the Ipswich Fringe and allocates it a level of development that is commensurate with this position at the top of the settlement hierarchy. This includes the allocation of Land east of Lorraine Way (JLP Policy LA116) and yet the Neighbourhood Plan fails to include this land within the settlement boundary despite including other site allocations</p>	<p>In December 2021 the Local Plan Inspectors issued a note to the District Council recommending that all new allocations in the Joint Local Plan (including the site at Lorraine Way) be deleted and that Settlement Boundaries revert to those in the adopted Local Plan. As such, the Neighbourhood Plan is not in contradiction with the Joint Local Plan as the site in Lorraine Way is not now to be allocated in the Joint Local Plan at this time.</p>	None

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		<p>that do not yet have planning permission. The failure to include JLP Policy LA116 within the settlement boundary means that the Neighbourhood Plan neither accommodates development commensurate with Sroughton's position in the Settlement Hierarchy, nor do the proposed Settlement Boundaries identify the extent of land which is required to meet the development needs of the parish. The exclusion of Land east of Lorraine Way (JLP Policy LA116) from the settlement boundary renders the draft Neighbourhood Plan contrary to the emerging Local Plan and to national policy and therefore fails to meet the basic conditions.</p>		
	<p>Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust</p>	<p>Paragraph 5.3 of the SNP states that, in accordance with Policy SP03 of the emerging JLP, the principle of development within defined settlement boundaries will be supported. This approach is reflected in SNP draft Policy SPTN 1, which refers to the Settlement Boundaries, as defined on the Policies Map.</p> <p>Whilst not reflected in the policy text, paragraph 5.3 goes on to state that outside the settlement boundaries, development will not normally be permitted unless there are 'exceptional circumstances', "as defined by the JLP and the National Planning Policy Framework (NPPF)".</p> <p>The term 'exceptional circumstances' appears to have been taken from the Submitted Version of the JLP, where at Policy SP03 it stated in Part 2 that 'outside of the defined settlement boundaries, in isolated locations development will only be permitted in exceptional circumstances'.</p> <p>However, through the hearing sessions for the examination of the JLP, the Councils have proposed a main modification to Policy SP03. This is in light of guidance from the Inspectors who questioned whether such a requirement was in compliance with national planning policy. On reflection, the Councils have considered this further and proposed a modification to the Inspectors, which will be consulted upon at a later date. The</p>	<p>Paragraph 5.3 will be amended</p>	

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		<p>proposed modification is that 'outside of defined development boundaries, development will only be permitted in circumstances specified in national policy'. To retain the requirement in the SNP for development to only be allowed outside the settlement boundaries in exceptional circumstances would be actively preventing development that is now proposed as acceptable in the relevant spatial policy of the emerging JLP.</p> <p>As such, Paragraph 5.3 should be amended to remove any reference to exceptional circumstances and should simply refer to proposals that are in accordance with national and district level policies (as per the draft policy text above).</p>		
	<p>Boyer on behalf of Taylor Wimpey UK Ltd</p>	<p>2.8 We support the principle of Policy SPTN 1, specifically the recognition that the NDP will accommodate development in accordance with the position of Sproughton in the Draft JLP. Sproughton is identified as Ipswich Fringe, which is the highest position in the settlement hierarchy. In accordance with Draft JLP Policy SP03, Ipswich Fringe "will act as a focus for development, which will be delivered through site allocations in the Plan and/ or in Neighbourhood Plans". We also support the recognition that the NDP cannot plan for less development than that specified in the Draft JLP.</p> <p>2.9 We acknowledge the reference made to settlement boundaries and note that Policy SPTN 1 states that settlement boundaries identify the extent of land which is required to meet the development needs of the parish and proposals for development located outside the settlement boundary will only be permitted where they are in accordance with national and district level policies.</p> <p>2.10 The settlement boundary set out in the Parish wide policies map does not, however, include the full extent of Draft JLP emerging allocation LA013 and therefore does not currently</p>	<p>Noted</p> <p>Noted</p> <p>In December 2021 the Local Plan Inspectors issued a note to the District Council recommending</p>	

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		<p>conform with the Draft JLP as it would prevent the comprehensive delivery of allocation LA013 which contributes to the Draft JLP housing numbers. As a result, the settlement boundary fails to meet Basic Condition e) set out in Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).</p> <p>2.11 We strongly recommend and request that the settlement boundary is amended to align with the settlement boundary set out within Draft JLP. This will ensure that the Pre-submission SNP appropriately accords with Basic Condition e) of Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).</p>	<p>that all new allocations in the Joint Local Plan (including the site at Lorraine Way) be deleted and that Settlement Boundaries revert to those in the adopted Local Plan. As such, the Neighbourhood Plan is not in contradiction with the Joint Local Plan as the site in Lorraine Way is not now to be allocated in the Joint Local Plan at this time.</p>	
	<p>Babergh District Council</p>	<p>Housing Numbers Settlement Boundary (SPTN1 etc. and various maps)</p> <p>Table 1 (pg 17) explains how the minimum housing requirement figure for this area (1,514 dwellings) has been calculated. Para 6.2 expands on the situation regarding JLP site allocation LA116 (Land east of Loraine Way), noting that there are unresolved issues. It also pre-empts an outcome whereby the JLP allocation is removed, and the housing requirement figure reduced accordingly. The reasoning for this is understandable but for now, and until such time as the JLP Hearings have come to an end, this Council's position is that the housing figure for Sproughton remains fixed at 1,514 dwellings. The Parish Council are also reminded of the requirement for this Neighbourhood Plan (NP) to be in general conformity with the strategic policies contained in any development plan for the area and that National Planning Policy Framework (NPPF) para 29 explains that: "Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies".</p>	<p>In December 2021 the Local Plan Inspectors issued a note to the District Council recommending that all new allocations in the Joint Local Plan (including the site at Lorraine Way) be deleted and that Settlement Boundaries revert to those in the adopted Local Plan. As such, the Neighbourhood Plan is not in contradiction with the Joint Local Plan as the site in Lorraine Way is not now to be allocated in the Joint Local Plan at this time.</p>	

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		<p>The question then is, what are options are on the table?</p> <ol style="list-style-type: none"> 1. This NP could anticipate that an alternative scheme will come forward on the LA116 allocation site at a later date, in which case the site should be included with the settlement boundary as shown on Map 5 and on the relevant policy maps. 2. If the Parish Council feel confident that LA116 cannot progress and accept that the minimum housing number will remain unchanged, this NP will need to find and allocate an alternative site to make up the shortfall. 3. The Parish Council can await the outcome of the decision on the JLP. <p>We do appreciate that none of the above will be desired by the Parish Council. Option 2 will set this Plan back simply because it will require you to undertake further assessment work etc. Some of that time might be negated somewhat if, for example, an alternative site which delivers an equivalent number of new homes, has happened to have come forward through the planning system in the meantime. That could then form the basis of an alternative allocation in this Plan.</p> <p>Finally, we note that the settlement boundary on Map 5 etc. is drawn to exclude the buildings around 'First Strokes' and the small field immediately south of this (bounded by Hadleigh Rd, the A1071 and the A14). In the submitted JLP all are included within the defined settlement boundary which follows the line of the A14 embankment. Amending the NP maps to match the JLP should, in this regard, be easily amended.</p>	<p>Given that the housing allocations in the Joint Local Plan now have no meaning, it is not necessary to consider any of the three options put forward here.</p>	
Chapter 5 General Comments				
V Durrant	If applicable	<p>Para 5.2 is of utmost importance in ensuring the continued character of the village and is not diluted in any move to assimilate our Parish into Ipswich. This would completely break down the 'Community Spirit' if allowed to happen. The objective of para 3 must be robustly defended and any adverse</p>	Noted	None

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		impacts on 'residential amenity' must be satisfactorily mitigated or strongly opposed.		
H Davies	-	The policy needs to be strengthened to emphasise no creeping coalescence	The policy is considered to be as strong as national and local strategic policies will allow.	None
B Hunt	-	Major traffic concerns using the village on already over crowded roads by large scale housing developments including possibility of approval of Snowasis in Claydon and Bramford.	Noted	None
P Powell	-	However: As above particularly with reference to 5.2 and 5.3	Noted	None
C Fuller	-	5.2 - 1st sentence - I disagree, this plan should strive to challenge the lpa to demonstrate & ensure the proposed scale of development delivers a sustainable development solution. 5.4- 1st sentence needs to include text ' not have a detrimental impact on the environmental quality'. 2nd sentence needs to be adjusted ' All development sites will need to avoid contributing to air, water & noise pollution and traffic volumes on the village road network'.	Neighbourhood plans cannot go against the strategic policies of Local Plans. The Parish Council have been challenging the planned growth through the Local Plan examination process. These amendments are not considered necessary.	None
	Boyer on behalf of Taylor Wimpey UK Ltd	2.12 We support the content of Chapter 5, particularly the acknowledgement that the A14 creates a physical barrier between the village and wider parish. The A14 is also considered to represent a physical barrier separating the Draft JLP emerging allocation LA013 with the wider countryside and this should be acknowledged in the Pre-submission SNP.	Noted	None
	Ipswich Borough Council	The opening sentence of paragraph 5.1 states "As noted above, in paragraph 3.6,..." However paragraph 3.6 is quite detached physically from this paragraph and it is therefore suggested that this is reworded for clarity. It is also recommended that paragraph 5.4 is amended when explaining the impacts of noise and air quality. The paragraph currently uses "adverse" when describing noise and air quality	This is not considered necessary Para 5.4 will be amended	Amend second sentence of Para 5.4 as follows:

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		impacts, but it is advised that this is amended to "unacceptable". This is because a noise and air quality impact can technically be adverse but not be deemed to be so adverse as to be deemed to harm amenity. Whereas unacceptable is the limit whereby amenity is considered to be harmed.		All development sites will need to have particular regard to the potential for adverse <u>unacceptable</u> noise and air quality impacts on new development arising from the presence of the A14 and the capacity of the highways network to accommodate additional traffic resulting from the proposal.
Policy SPTN 2 Housing Mix				
V Durrant	If applicable	I believe the Neighbourhood Plan (NP) focus' on the needs identified within the village community, and should where possible prioritize the demand from local people initially. I consider too many 'buy to let' speculators are distorting the housing market, and especially housing costs. The design quality of new homes should and must be improved, especially on larger developments, such as Wolsey Grange, where the 'shoe box' design is considered poor.	Planning policies cannot control who buys property. The design policies of the Neighbourhood Plan have been introduced to seek to achieve a better quality of design in new development.	None
H Davies	-	I is important that developers build houses that are needed e.g. affordable housing & homes with fewer bedrooms as that is what is needed - ref the HNA NOT the houses that maximise their profits.	The Plan seeks to achieve this	None
J Webb	-	The Gov needs to define Housing Mix and affordable housing. Who can afford 2021 £200,000 in not affordable. At least 2 car parking spaces per house. Extras to have a car park which builders have to provide at a cost to users off road.	Noted	None
C Fuller	-	needs to be set within the context of comments made in this consultation response	Noted	None
J Pateman-Gee		There are three parts to this policy. The first addresses the desire to have more three bed development. Please note this will only apply to outline and full applications and not reserved matters. The word *shall" is great, but the following word of "emphasis" takes away the strength. If you want 3 beds to be	To be completed once consideration to Babergh's comments is complete	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>the highest proportion of the mix, say so. Highest proportion will only mean 51% unless you say otherwise.</p> <p>The paragraph about bungalows is meaningless filler. It states support, but it's doesn't state you will not support without bungalows. If you want bungalows, state that X% or a minimum has to be bungalows. Also don't give the developer an excuse to avoid bungalows as being out of keeping with the area. A bungalow doesn't have to look like all the bungalows of the 60s; that is a lot of the village. Bungalows can be more traditional single storey buildings of interest, maybe innovation.</p> <p>The last paragraph on affordable housing is good. However, if you want to improve, maybe define small clusters as no more than 4 units. The risk is that a developer will define small as 10 or 15 or something that suits them. .</p> <p>Suggested Wording Change for this policy:</p> <p>The following is respectfully suggested for consideration:-</p> <p><i>In all housing developments of ten or more dwellings, there shall be a higher proportion of three-bedroomed homes within the proposed scheme, unless it can be demonstrated that:</i></p> <p><i>a) the particular circumstances relating to the tenure of the housing dictate otherwise; or</i></p> <p><i>b) the latest publicly available housing needs information adopted by the LPA and/or Parish Council identifies a need for a different housing mix for Neighbourhood Plan Area.</i></p> <p><i>To ensure suitable access to the housing market for all parts of society, including those less mobile, there shall be a minimum of 1 bungalow (single storey with no accommodation in the roof) per 10 dwellings provided.</i></p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p><i>Proposals that include affordable housing will be required to ensure that:</i></p> <p><i>i. it is designed to be 'tenure blind' (so that it is indistinguishable from open market housing) either on site or, where schemes do not include onsite open market housing, the wider area; and</i></p> <p><i>ii. where appropriate, small clusters of affordable housing (clusters of no more than 5 units) are distributed around the larger site and indistinguishable from the housing mix.</i></p>		
Dr Hoque	National Highways (former, Highways England)	<p>Housing Policy SPTN 2 - Housing Mix Policy SPTN 3 - Affordable Housing on Rural Exception Sites We have noted the following statement stated in para 6.1, – “.....The emerging Joint Local Plan (November 2020) identifies a requirement for at least 1,514 additional new homes in the parish between 1 April 2018 and 2037.” While preparing the transport supporting documents such as Transport Statement/Transport Assessments, for these 1,514 additional new homes must include all committed development within any assessment carried out for any surrounding road junction capacity assessment.</p>	Noted	None
	Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust	<p>Draft policy SPTN2 (Housing Mix) states that there shall be an emphasis on providing a higher proportion of three-bedroomed homes within all schemes of ten or more homes. Whilst this reflects the housing need survey carried out by Aecom for the SNP, it implies that there is little or no requirement for 4+ bedroom homes. We would query whether this is appropriate given that it will limit the choice of housing for those already living in the village who may require 4+ bedroom homes in the future. In addition, there may be a requirement for 4+ bedroom homes to meet affordable housing needs arising in the wider housing market area as well as different types of housing, such as self and custom build housing, which are more likely to give rise to a need for 4+ bedroom homes. We suggest that the policy is amended to</p>	The policy does not imply that there is no requirement for 4+ bedroom homes and criterion a) notes that a different mix, such as for affordable housing, can be provided if “the particular circumstances relating to the tenure of the housing dictate otherwise”.	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>reflect these different requirements so that it provides for the full range and type of new homes that may be required during the life of the SNP.</p> <p>In addition, we would suggest that the word "small" is omitted from the draft policy in the context of clusters of affordable housing. Whilst it is appropriate to distribute affordable housing around larger sites to ensure the delivery of mixed and balanced communities, imposing a restriction on affordable housing cluster sizes may compromise the design of a scheme. Furthermore, it may also compromise the ability of a Registered Provider to manage the affordable homes effectively, potentially prejudicing the delivery of much needed affordable housing. We consider that these issues can be avoided by removing reference to "small" and simply referring to clusters of affordable housing. In any event, Babergh and Mid Suffolk Councils already seek to ensure that affordable housing is not placed in groups of more than 15 homes.</p>	<p>This is not considered necessary.</p>	
	<p>Boyer on behalf of Taylor Wimpey UK Ltd</p>	<p>2.13 We support Policy SPTN 2 and the emphasis on providing a higher proportion of three bedroomed homes within a scheme of 10 or more dwellings.</p> <p>2.14 It is acknowledged that the mix proposed in the Pre-submission NDP does not fully align with the Strategic Housing Market Assessment (January 2019), which supports the Draft JLP.</p> <p>2.15 The Draft JLP supporting text 06.09, however, recognises housing need surveys may give a more localised view on the type and size of housing required, and it is noted that the Presubmission SNP is supported by a Housing Needs Assessment (HNA) prepared by AECOM.</p> <p>2.16 The AECOM HNA has been supported by the following local data:</p> <ul style="list-style-type: none"> • Census 2001 and 2011; 	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<ul style="list-style-type: none"> • Land Registry data on prices paid for housing within the local market; • Population and household projections produced by the Office of National Statistics (ONS); • Information on current property asking prices, for housing for sale or rent, from home.co.uk; and • Valuation Office Agency (VOA) data on local housing stock by dwelling type. <p>2.17 This includes appropriate evidence demonstrating the need for larger family homes and a departure from the current SHMA (2019) allowing for a separate housing mix to be secured to that underpinning the Draft JLP. Policy SPTN 2 is therefore still considered to meet Basic Condition e) in Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).</p>	Noted	
	Suffolk County Council	<p><i>Adaptable homes and an ageing population</i></p> <p>The neighbourhood plan refers to an ageing population, and states in paragraph 2.8 that many residents are aged 65 or older. Paragraphs 6.14 to 6.16 discusses M4(2) and Lifetime Homes standards which is welcome, however it is suggested that these desires for accessible and adaptable homes could be set out in policy.</p> <p>While the neighbourhood plan cannot set a standard, it would be helpful to set out support for this kind of housing in the neighbourhood plan. The emerging local plan will be setting a requirement for the proportion of dwellings to be built to this standard, it would be positive if the neighbourhood plan could indicate its support in the meantime.</p> <p>As such, the following wording is recommended to be included in Policy SPTN2 Housing Mix, following the line regarding bungalows:</p>	As noted in the County Council comments “the neighbourhood plan cannot set a standard” and it	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>"The provision of bungalows will also be supported where the proposal would not have a detrimental impact on the character of the area in the vicinity of the site. <i>Support will be given for smaller 2 and 3 bedroomed homes that are adaptable (meaning built to optional M4(2) standards), in order to meet the needs of the aging population, without excluding the needs of the younger buyers and families."</i></p> <p>It is suggested that there could also be further considerations for the needs of residents who are living with dementia in the community, and the potential for making Sproughton a "Dementia-Friendly" village. The Royal Town Planning Institute has guidance on Town Planning and Dementia¹, which may be helpful in informing policies.</p> <p>¹ https://www.rtpi.org.uk/practice/2020/september/dementia-and-town-planning/</p>	is therefore not appropriate to amend the policy as suggested,	
	Babergh District Council	<p>The Policy is supported but could go further by specifying the percentage of 3-bed homes required based on the HNA information set out under para 6.12.</p> <p>We also recommend that criterion b). refers to '... <u>Neighbourhood</u> Plan area'</p>	I have no problems with this	
Policy SPTN 3 Affordable Housing on rural exception sites				
V Durrant	If applicable	This is exactly what must happen rather than just being given 'lip service' and then being deleted/overlooked for spurious 'financial viability' reasons.	Noted	None
J Webb	-	Some "Council Housing" for those who cannot afford to buy.	Noted	None
P Powell	-	Again However, The amendments proposed to the JLP by BMSDC removed much of SP03 and therefor limitations on rural development. The Inspector then questioned the relevance of exception sites.	The NP policy is in accordance with the NPPF and therefore remains appropriate	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		It seemed to me their thoughts were that if those limitations had been removed was there any relevance to exception sites as no exception would be required. I do not think any indication was given how they might direct on these issues.		
C Fuller	-	I believe affordable housing should be delivered within a suitable scale of housing growth where it meets the tests of sustainable development at strategic and all subsequent levels, set within the context of comments made in this consultation response. There is a direct conflict between proposing or accepting 'minimum' housing growth targets at a strategic level (ie, maximum is undefined) and being able to demonstrate that this is environmentally sustainable.	Noted	None
Dr Hoque	National Highways (former, Highways England)	Housing Policy SPTN 2 - Housing Mix Policy SPTN 3 - Affordable Housing on Rural Exception Sites We have noted the following statement stated in para 6.1, – “.....The emerging Joint Local Plan (November 2020) identifies a requirement for at least 1,514 additional new homes in the parish between 1 April 2018 and 2037.” While preparing the transport supporting documents such as Transport Statement/Transport Assessments, for these 1,514 additional new homes must include all committed development within any assessment carried out for any surrounding road junction capacity assessment.	Noted	None
D Taylor	-	Ensure sufficient affordable housing is provided by developers on sites already earmarked for new housing as there is already an extremely high proportion of development assigned within the parish in the joint local plan.	Noted	None
C Taylor	-	Bearing in mind the large amount of new housing already planned for the village, it seems unnecessary to consider development beyond the agreed settlement boundary. More pressure needs to be put on developers to facilitate affordable housing.	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
J Pateman-Gee		<p>There are a lot of issues with this policy and lots of loop holes for developers to exploit. However, the point is it is not clear. Why have a policy on Affordable Housing when the JLP and its associated Supplementary Planning Document in due course as well as the NPPF shall essentially supersede this whenever such affordable housing schemes come forward?</p> <p>There are lots of problems, some examples:</p> <ul style="list-style-type: none"> - What is small scale? 5 or 50. A developer will say 50+ - "is for people that are in housing need because they are unable to buy or rent properties in the village at open-market prices. Once you define "the village", how do you prove this and be consistent and fair? By the way less and less can afford to live in the "the village", so that's a lot of people with proven need? - "paragraph 78 of the NPPF" Dont reference paragraphs of NPPF, it changes almost every year and just changed in July 2021. - Small number of market homes, small again is any number and a floodgate to open. - The last section refers to the countryside, but the point of this policy is exceptional and thus it is always the countryside! 	<p>The supplementary Planning Document has yet to be produced and will not carry the weight of a Development Plan policy.</p> <p>It is not normally down to the developer to decide as it is determined where a local housing needs assessment is undertaken.</p> <p>Through a housing needs survey and the Babergh Choice Based Lettings Scheme.</p> <p>It would be likely that the Examiner would require the NPPF paragraph to be referenced.</p> <p>The policy clearly states that these would only be considered where the viability of the scheme would be negative for the affordable homes.</p> <p>The last sentence will be amended to delete "countryside".</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>Also you don't need to apply more design criteria to this policy when you have a design policy that applies to the proposal in any event. However, if the policy is so desired, it is rewritten below in a form that would be harder to break and will not be out of date so fast.</p> <p>Suggested Wording Change for this policy:</p> <p><i>Proposals for the development of small-scale (not more than 9 units) secured affordable housing schemes (as defined as Affordable by the most up to date NPPF), on rural exception sites outside the settlement boundary, will be supported where there is a demonstrated proven local need and provided that the housing:</i></p> <ul style="list-style-type: none"> <i>i. remains affordable in perpetuity secured by legal obligation;</i> <i>ii. is offered, in the first instance, to people with a demonstrated local connection to Sproughton, as defined by the Gateway Home Choice Based Lettings Scheme (as may be amended or replaced). Where there is no local connection demonstrated, a property should then be offered to those with a demonstrated need for affordable housing in neighbouring villages before wider afield.</i> <i>iii. proposals shall demonstrate that a local need exists which cannot otherwise be met by applying normal planning policy for the provision of affordable homes in association with market housing.</i> <p><i>In exceptional circumstances, market dwellings will be permitted with the exceptional affordable housing scheme if it can be demonstrated:</i></p> <ul style="list-style-type: none"> <i>a) that no other means of viable funding the construction of the affordable homes is available; and</i> <i>b) the market housing is subsidiary by being no more than 25% of the affordable housing element of the proposal;</i> <i>c) the amount of market housing required is, as demonstrated through a viability assessment, the minimum required to deliver the affordable housing.</i> 	<p>It is important to emphasise that both tenures should be designed and constructed to the same design standards.</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		Lastly, What are exceptional circumstances? Did you want to have an idea of these ahead of some developer surprising you?		
	Babergh District Council	In the first paragraph, the NPPF reference should be to paragraph 72. The policy wording is otherwise consistent with what we have seen come forward elsewhere.	The policy will be amended.	Amend the first sentence of Policy SPTN 3 as follows: Proposals for the development of small-scale affordable housing schemes, including entry level homes for purchase (as defined by paragraph 78 <u>72</u> of the NPPF) on rural exception sites outside the settlement boundary, where housing would not normally be permitted by other policies, will be supported where there is a proven local need and provided that the housing:

Chapter 6 Housing General Comments

V Durrant	If applicable	I consider this essential to maintain and develop a thriving local community within the village.	Noted	None
H Davies	-	It is important that developers prove the viability of their proposals at the start so that any later claims that the development is not viable without cutting the number of affordable homes can be assessed in an open and transparent way.	Noted	None
P Powell	-	However as per comments made against policies 1 & 3.	Noted	None
C Fuller	-	needs to be adjusted to take account of comments made in this consultation response	Noted	None
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No. We object to the statement at paragraph 6.2 that: "a planning application for the development of the land East of	In December 2021 the Local Plan Inspectors issued a note to the District Council recommending that all new allocations in the Joint Local Plan (including the site	Paragraph 6.2 will be amended to note the change in circumstances of the Joint Local Plan.

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>Lorraine Way (Policy LA116) was refused planning permission for 49 homes in 2020 and subsequently turned down at a planning appeal. It was considered that development on this site would have a detrimental impact on the adjoining heritage asset. Given the fundamental reason for refusal, this is something that is unlikely to be addressed and brings into doubt the deliverability of the site. However, given that the Joint Local Plan allocates the site and, across the district, exceeds its the minimum housing requirement by over 20%, there is no need for the Neighbourhood Plan to allocate further sites for housing to make up for this loss. This will be a matter to be considered by the Planning Inspector examining the Joint Local Plan during 2021."</p> <p>This quote misinterprets the appeal decision which found that the proposed development would have a detrimental impact. It does not conclude that any development on the site would have a detrimental impact. As set out under question 1, the District Council has reviewed the appeal decision and has presented detailed further evidence to demonstrate the acceptability of the site allocation on heritage grounds.</p>	<p>at Lorraine Way) be deleted and that Settlement Boundaries revert to those in the adopted Local Plan. As such, the Neighbourhood Plan is not in contradiction with the Joint Local Plan as the site in Lorraine Way is not now to be allocated in the Joint Local Plan at this time.</p>	
	Boyer on behalf of Taylor Wimpey UK Ltd	2.18 We support the content of Chapter 6, notably recognition that the Draft JLP has identified a housing required for the District, and identifies the emerging allocation at LA013 for 800 dwellings.	Noted	None
	Suffolk County Council	Paragraph 6.2 typo: "However, given that the Joint Local Plan allocates the site and, across the district, exceeds <u>its the</u> minimum housing requirement by over 20%,"	Para 6.2 will be amended	Amend Para 6.2
	Babergh District Council	The inclusion of any text that refers to Nationally Described Space Standards has received a mixed response from our NP Examiners, especially where an associated policy requires adherence to those standards. There is no such policy requirement in this draft Plan but to be consistent with the	It is agreed that Para 6.17 adds little to the Plan given that the matter is addressed in the Joint Local Plan.	Delete Para 6.17 and supporting table

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>approach being taken elsewhere our recommendation is that para 6.17 and Table 1 (pg 22) are deleted in full. The following paragraphs will need re-numbering as a consequence.</p> <p>Through our internal consultation, the last paragraph in 6.7 came under specific scrutiny. We see the limitation on the number of permitted storeys in a dwelling is not carried through to policy text but do note that SPTN 16 relies on a checklist derived from the AECOM Design Guidelines and Codes document. Within this:</p> <ul style="list-style-type: none"> • DC01 part 'i' (pg 33) states that 'large scale development is not appropriate for the village and should be avoided' and seems to conflict directly with some of the potential allocations. • DC03, part 'i' (pg 38) relates to properties being no more than two storeys high, which seems unduly restrictive. • DC03, part 'iii' (pg 38) works better because it relates to the surroundings, whilst 'i' isn't entirely consistent with that more flexible approach, especially noting the supporting text which notes that the village/parish has examples of one, two, 2.5, and three-storey buildings. <p>We therefore seek an amendment to DC03 (pg 38) of the Design Guidelines document which will see part 'i' read as follows:</p> <p>i. Development within the Parish should be of a scale and design to reinforce the locally distinctive character of the area. Development will generally be expected to be of no more than two storeys in height unless specific justification is given and when having regard for ii. and iii. below.</p> <p>Para 6.2 Delete the word 'its' from before the words 'the minimum' in the fourth sentence.</p>	<p>We might need to address this – village centre or whole parish?</p> <p>I guess you'll want to stick with this?</p> <p>One to think about</p> <p>I have no problem with this</p> <p>Para 6.2 will be amended accordingly</p>	<p>Amend the fourth sentence of Para 6.2 as follows: However, given that the <u>emerging</u> Joint Local Plan</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
				<p>allocates the site and, across the district, exceeds its the minimum housing requirement by over 20%, there is no need for the Neighbourhood Plan to allocate further sites for housing to make up for this loss.</p>
	<p>Ipswich Borough Council</p>	<p>In paragraph 6.2 references are made to the "Joint Local Plan". It is recommended that "emerging" is added before these references to make clear to readers that this is an emerging development plan document and not adopted.</p> <p>Paragraph 6.11 directs readers towards the AECOM Housing Need Assessment (HNA) (2020). The HNA states that "The proposed Neighbourhood Plan period starts in 2021 and extends to 2036, therefore comprising a planning period of 15 years." As the Neighbourhood Plan period is proposed to cover 2018 – 2037 the evidence base should cover this entire period. It is therefore recommended that this evidence is updated to adequately cover the entire plan period for soundness.</p> <p>The Borough Council has some concerns that the Design Code proposed is too prescriptive and needs to ensure that it does not negatively impact on existing local plan site allocations and existing planning permissions which is beyond the remit of the Neighbourhood Planning process and national objectives.</p>	<p>Para 6.2 will be amended</p> <p>It is not considered necessary to amend the evidence base.</p> <p>As noted in the comment, the Design Code cannot influence proposals that already have planning consent.</p>	<p>Amend the fourth sentence of Para 6.2 as follows: However, given that the <u>emerging</u> Joint Local Plan allocates the site and, across the district, exceeds its the minimum housing requirement by over 20%, there is no need for the Neighbourhood Plan to allocate further sites for housing to make up for this loss.</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>For example, the standalone reasoned justification paragraph beneath the space standards states that "Three storey homes are not permitted under the Neighbourhood Plan Design Code. Any development permitted shall be restricted to up to two storeys in height. For the avoidance of doubt this does not permit two and a half storey buildings with accommodation in roof spaces."</p> <p>The Council does have concerns that imposing a blanket ban on three-storey developments and roof extensions is unlikely to be deemed to be sound, particularly as the Design Code is not itself a policy within the Neighbourhood Plan and is a standalone document that is not subject to the same level of status as the Neighbourhood Plan itself.</p> <p>In addition, roof extensions are often classified as 'Permitted Development' and often do not require planning permission.</p>	In this instance, the Neighbourhood Plan policies could not be applied.	
Policy SPTN 4 - Employment Sites				
V Durrant	If applicable	I strongly support this, but it is important to ensure that para 7.6 is adhered to avoid the adverse impact that has resulted from the construction of the La Doria building and its 'non compliance' with the maximum planned building heights set out for the development. I also believe that the colour of such buildings is important and must be chosen to 'blend in' with its surroundings, and NOT stand out from them.	Noted	None
H Davies	-	It needs to be clear that an increase in noise, traffic & pollution needs to be mitigated.	Noted	None
C Fuller	-	<p>The text adjusted</p> <p>'The retention detrimental impact on the landscape character, environmental and heritage assets'.</p> <p>National planning policy recognises that brownfield and</p>	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		employment land can support significant biodiversity and can contribute to important green infrastructure		
J Pateman-Gee		<p>An emerging theme with these policies is being unnecessarily wordy. For example "existing employment and other business use" in this policy. If it's not existing then what other business would it be?</p> <p>Again this policy has lots of issues as it tries to cover everything and by doing too much it's weaker for it and undefined. For example, what does "<i>Proposals for non-employment or business uses that are expected to have an adverse impact on employment generation</i>" mean? Just how would a planning officer in defendable terms prove a proposed use would have an adverse impact on employment generation?</p> <p>The real problem is this policy fails to achieve what it probably set out to achieve. At no point does this policy prevent the loss of an employment site. This policy supports existing businesses; it also has a criteria for proposals for non employment types of applications; however it has nothing to stop or provide a criteria for the loss of employment. Read it through again with this in mind and you will see.</p> <p>Assuming that these points can be addressed, we can then turn to the criteria.</p> <ul style="list-style-type: none"> A) This seeks to ask for evidence that attempts to sell have been made. Sadly it provides no criteria on how or what is evidence should be submitted or how long it should cover. B) This set out very subjective judgement that environmental harm that may outweigh economic use. This a valid criteria, but very much a judgement. C) This provides we can loss a employment use if an alternative use or mix of uses would assist in regeneration and offer greater benefits to the 		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>community in meeting local business and employment needs. I have never come across anything like this and would not know how to prove that something is better for community and business than an existing business. Does this simply mean that a business that might have a few more employees than the existing one can be supported? What will the parish do if it is argued that housing generates around 3 jobs per house and provides customers for local businesses....does this not comply if the existing business just employs a couple.</p> <p>D) This states we can remove an existing use (once the first part of this policy is changed) if it is for an employment related support facility, such as employment training/ education or workplace crèche. So this would allow the loss of the Wild Man Pub if this was proposed as a crèche.</p> <p>E) Same as C, but with the addition of sustainable use, but such uses are not define and this represents a significant risk.</p> <p>The policy states you only need to comply with one of the criteria. Sadly this means developers will always choose the easiest one. My money would be to prove that the business leads to environmental harm as this normally always is the conflict of an existing business near residential use regardless of economic benefit. This criteria is also the easiest to find support for locally, especially if you live next door to say the noisy pub.</p> <p>The Joint local plan also has a retention of employment use policy proposed and this one includes marketing campaigns and other criteria. Therefore it is questioned why this one at NP level needs to be so overly complex and instead perhaps it should be worded so it marries up with the joint local plan version and covers exceptions (such as creches) that the parish wishes to put forward. In the end both the new joint local plan</p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		and this neighbourhood plan will form the same development plan and so the opportunity for the neighbourhood plan is the detail at a local level and not necessarily just a repeat what the joint local plan already says.		
Dr Hoque	National Highways (former, Highways England)	<ul style="list-style-type: none"> • Business and Employment Policy SPTN 4 - Employment Sites Policy SPTN 5 - New Businesses and Employment Development Policy SPTN 6 - Farm Diversification National Highways (former Highways England) is already discussing a few of the proposed employment development applications. The Para 7.1 has mentioned few employment areas located between Junction 54 of the A14 and the main railway line and three other employment areas– <ul style="list-style-type: none"> o Sproughton Enterprise Park, o Farthing Road Industrial Estate o Thompson and Morgan o Wolsey Grange 1 and o the Wolsey Grange Masterplan Area (interchange 55). We support the statement in para 7.5 – “While acknowledging the content of Policy SP05, any expansion of these and other employment sites must not result in unacceptable increases in traffic on the roads through Sproughton village or roads that lead to the sites, either through a significant increase in the number of people working on the site or through lorry movements servicing the site.” They also must not result in a severe impact upon the A14 or its junctions.	Noted	None
Policy SPTN 5 New Business and Employment Development				
V Durrant	If applicable	I do have trouble with some of the wording here. Who defines what is 'unacceptable and to whom, and especially the definition of 'residential amenity'. These issues are completely overlooked or over-ridden in efforts to persuade developers to go ahead, such as happened with the 'La Doria' building.	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
H Davies	-	It is important the new buildings comply with the design code and blend into the site with no impact on wildlife or biodiversity.	Noted	None
C Fuller	-	Needs to be set within the context of comments made in this consultation response	Noted	None
J Pateman-Gee		<p>It's assumed that outside the settlement boundary you would also want new business to also not harm residential amenity, heritage assets and the highways network as stated for businesses within the settlement boundary. This policy doesn't state this.</p> <p>Instead, criteria a and b apply to business outside the settlement boundary. Criteria a is fine. Sadly criteria b is a floodgate. The first problem is the idea of "small scale". 20 caravans are small scale for me in my profession. So would this scale match the parish expectation? Essentially this allows any form of use in the countryside, if small (subjective), appropriate (subjective again and no definition provided) and needs to be there in the countryside (very subjective and again no definition of what need may be in mind).</p> <p>Given the lack of business allocation and space in the settlement of Sproughton, this would be an easy argument to get my "small" commercial interest in the countryside if I was a developer.</p> <p>The last paragraph that starts "Where possible..." is a lost cause. Begging for some to be possible or "should" will be ignored and has no bearing or strength to affect a planning decision or influence a developer. State what you want, don't give them a choice.</p>		
Dr Hoque	National Highways (former,	<ul style="list-style-type: none"> Business and Employment Policy SPTN 4 - Employment Sites Policy SPTN 5 - New Businesses and Employment Development Policy SPTN 6 - Farm Diversification 	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
	Highways England)	<p>National Highways (former Highways England) is already discussing a few of the proposed employment development applications. The Para 7.1 has mentioned few employment areas located between Junction 54 of the A14 and the main railway line and three other employment areas–</p> <ul style="list-style-type: none"> o Sproughton Enterprise Park, o Farthing Road Industrial Estate o Thompson and Morgan o Wolsey Grange 1 and o the Wolsey Grange Masterplan Area (interchange 55). <p>We support the statement in para 7.5 – “While acknowledging the content of Policy SP05, any expansion of these and other employment sites must not result in unacceptable increases in traffic on the roads through Sproughton village or roads that lead to the sites, either through a significant increase in the number of people working on the site or through lorry movements servicing the site.” They also must not result in a severe impact upon the A14 or its junctions.</p>		
Policy SPTN 6 - Farm Diversification				
V Durrant	If applicable	I believe that care must be taken when allowing such developments and that they do not serve as a pre-cursor and precedent for the unacceptable developments of housing sites.	Noted	None
C Fuller	-	Text needs adjusting 'Proposals for new business ... residential amenity, environmental and heritage assets and the highways network' 'Proposals for equestrian effect on the character, environmental quality and appearance of the locality'	Noted	None
J Pateman-Gee		The first paragraph on the location of new business is a repeat of NP policy 5. This needs to be removed.		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>The rest applies to equestrian use and is fine. In planning the word "impact" is used more than "effect", but I do not think it matters.</p> <p>Last thought, Equestrian is not Agricultural use in planning terms and so it is unclear why this policy is called Farm Diversification.</p>		
Dr Hoque	National Highways (former, Highways England)	<ul style="list-style-type: none"> • Business and Employment Policy SPTN 4 - Employment Sites Policy SPTN 5 - New Businesses and Employment Development Policy SPTN 6 - Farm Diversification <p>National Highways (former Highways England) is already discussing a few of the proposed employment development applications. The Para 7.1 has mentioned few employment areas located between Junction 54 of the A14 and the main railway line and three other employment areas–</p> <ul style="list-style-type: none"> o Sproughton Enterprise Park, o Farthing Road Industrial Estate o Thompson and Morgan o Wolsey Grange 1 and o the Wolsey Grange Masterplan Area (interchange 55). <p>We support the statement in para 7.5 – “While acknowledging the content of Policy SP05, any expansion of these and other employment sites must not result in unacceptable increases in traffic on the roads through Sproughton village or roads that lead to the sites, either through a significant increase in the number of people working on the site or through lorry movements servicing the site.”</p>	Noted	Non

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		They also must not result in a severe impact upon the A14 or its junctions.		
M Levett	-	I support SPTN6 fully but observe that light pollution is a major factor in exiling wildlife and visual amenity at night	Noted	None
	Babergh District Council	Given the two issues are discussed separately in para's 7.9 and 7.10, consideration should be given to having separate policies on Farm Diversification and Equestrian Development. Alternatively, the policy title could be amended to covers both.	Amend Policy Title?	
Chapter 7 Business and Employment General Comments				
P Wood	-	I believe more detail needs to be obtained from potential business developments as in the past the lure of jobs has never born fruition	Noted	None
R Hardacre	(Babergh District Council Councillor)	Minor quibble, but "Work at or mainly from home" would be better placed at the top of the chart, being a smaller distance travelled than 2km!	Noted	None
P Powell	-	Clerical note: Section 7.1: the I55 commercial development is not part of Wolsey Grange1 which is a Taylor Wimpey development, It is a separate developer but it is part of the land allocated in Policy CS7 which is the Ipswich Fringe Strategic Development Site in which both WG1 and I55 sit.	The outline planning permission at Wolsey Grange includes the employment land.	None
C Fuller	-	section 7.10 - Need to adjust text 'Where such proposals wider landscape, environmental Notedassets and the countryside	Noted	None
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No opinion	Noted	None
	Boyer on behalf of Taylor Wimpey UK Ltd	2.19 We largely support the content of Chapter 7 (Business and Employment) and Questions 8-11. We have no further comments to make on this Chapter/these questions.	Noted	None
	Ipswich Borough Council	Paragraph 7.1 references "greater Ipswich" but it is recommended that "Ipswich Strategic Planning Area (ISPA)" is used instead for consistency with the emerging B&MS Joint Local Plan. This is because Babergh/Mid Suffolk districts, East	Agree	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>Suffolk and Ipswich work together to meet the employment needs within the Ipswich Functional Economic Area.</p> <p>There should also be reference to the relationship of Sproughton to Ipswich and the identification of Ipswich as one of six 'Priority Places' in the Economic Strategy for Norfolk and Suffolk.</p> <p>Paragraph 7.4 references Sproughton Enterprise Park as a 'strategic employment location' which is welcomed. However, it goes on to refer to the 'remaining four plots of the Enterprise Park' and the need to be 'sensitive to the landscape, biodiversity and heritage assets'.</p> <p>The Enterprise Park is controlled through the requirements set out in conditions attached to the outline planning consent which means the principles of the development have already been established. In addition, the height of any development is limited to 28m through condition attached to the planning consent, and road and infrastructure requirements have been agreed and set out through the parameters plan which was part of the outline planning approval.</p> <p>Proposals are set in place to develop a local nature reserve which is being taken forward by a specialist consultancy and the outline planning consent sets out 36 conditions which need to be delivered as part of the development. The use, height, roads, infrastructure and layout is covered through a master plan and it is misleading to refer to four plots remaining as the development of the remaining acreage of the site is dependent on the end user. For example, it could be a single end user and reference to acreage is therefore more appropriate than reference to plots.</p> <p>In paragraph 7.5 there is reference to expansion of these (including the Sproughton Enterprise Park) 'must not result in</p>	<p>This is not necessary</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>unacceptable increases in traffic on the roads through Sroughton village or roads that lead to the sites...'</p> <p>In terms of the Sroughton Enterprise Park, a Site Wide Travel Plan has already been agreed with Suffolk County Council and the Borough collects data which is sent to the county for monitoring traffic impact so traffic is already being monitored closely. It also needs to be recognised that the A14 is a strategic highway of regional and national importance linking the Suffolk coastal ports to the Midlands and beyond and via the A12 junction to London.</p> <p>In terms of the Sroughton Enterprise Park, the parameters for the full development of the site is already under the control of an existing outline planning consent which in planning terms is a heavier material consideration in terms of site development than Policy SPTN4 in the draft Neighbourhood Plan. In addition, the Parish Council will have been consulted on the outline application and matters raised taken into account in determining the planning consent.</p>	<p>Noted</p> <p>Noted</p>	
	<p>Babergh District Council</p>	<p>It is not clear where the 'increased 15%' figure has come from. To recognise that the number of people working from home has increased and perhaps tie that in with the mention of covid-19 in the Foreword, might we suggest that the penultimate sentence be split and now read:</p> <p>"Home working is popular in the parish with the 2011 census showing 15% of those in employment working from home. That figure is likely to have increased since then and, perhaps, has accelerated even further as one the longer-term impacts on work patterns caused by the Covid-19 pandemic."</p>	<p>Amend Para 7.3 as suggested</p>	<p>Amend Para 7.3</p>
Policy SPTN 7 – Area of Local Landscape Sensitivity				
<p>K Athroll</p>	<p>-</p>	<p>Can i add that the land around Redhouse cottages should also be included (to deter ANY building work along church lane either-side).</p>	<p>These are included in the Valued Landscape designation under the same policy.</p>	<p>None</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
C Fuller	-	The River Gipping & Valley within the Parish boundary should be protected as a landscape. The other listed landscape corridors 'The Grindle, Abbey Oaks & Sproughton Hall should also be protected.	The Landscape Appraisal did not conclude that these areas qualified as sensitive landscape.	
D Taylor	-	Not in agreement with any development taking place in the area of Local Landscape Sensitivity	Noted	None
C Taylor	-	Development should not be permitted in these areas.	Noted	None
J Pateman-Gee		Nothing wrong with this one and I understand and support the point. Not sure if it will be upheld by planning or inspectors on appeal. I suspect the value of this lies in the fight of people behind it at the appropriate time.	It would have the same weight as any other policy in the Development Plan and would be the starting point for making decisions.	None
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>2.20 We strongly object to Policy SPTN 7 and specifically the accompanying policies map which designate Valued Landscape.</p> <p>2.21 Policy SPTN 7 seeks to designate large swathes of allocation LA013 as a valued landscape, whereby development should only be permitted where it seeks to protect and enhance the special landscape qualities of the area. This suggests that development within valued landscapes should be resisted, which would appear to align with NPPF (2021) Paragraph 174 stating that planning decisions should protect and enhance valued landscapes. Whilst we support and acknowledge the need to protect valued landscape, we do not agree with the areas that have been designated. As a whole this Policy is restrictive and does not provide a positive policy approach.</p> <p>2.22 Notwithstanding our fundamental objection to the Pre-submission SNP evidence base which supports the designation of valued landscapes (as discussed further below and in the following Section), as large parts of LA013 are now being sought to be kept free from development this, in turn, constrains large swathes of the site's developable area.</p> <p>2.23 This could inhibit the delivery of 800 dwellings on emerging allocation LA013 and would therefore conflict with</p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>the Draft JLP as it would prevent the comprehensive delivery of allocation LA013 which contributes to the Draft JLP housing numbers. In turn, Policy SPTN 7 fails to meet basic condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011) in so far as it conflicts and undermines strategic policy SP04 (Table 04) and the minimum' homes necessary in the Draft JLP.</p> <p>2.24 Policy SPTN 7 has also failed to recognise the implications it will have on housing delivery as set out within Table 1 (Page 17) of the Pre-submission SNP.</p> <p>2.25 We also have significant concerns with regards to the landscape evidence base underpinning Policy SPTN 7, such as the Neighbourhood Plan - Landscape Assessment (Alison Farmer Associates; February 21), which does not align and arguably undermines the evidence base underpinning the Draft JLP.</p> <p>2.26 As discussed in the following Section, the Draft JLP is supported by a robust evidence base, which includes a Landscape Sensitivity Assessment of the SHELAA Sites. Emerging allocation LA013 was assessed as part of this process and considered to be of moderate sensitivity to residential development. The Landscape Assessment supporting the Presubmission SNP considers the site to have high sensitivity and also claims that the site has little to no capacity for further development, which clearly does not align with the conclusion reached by BMSDC and supporting evidence to the Draft JLP.</p>		
	Suffolk County Council	<p>Policy SPTN7 Area of Local Landscape Sensitivity and SPTN8 Settlement Gaps are welcomed.</p> <p>While the Landscape Appraisal seems to suggest just one relatively large area to the north-east of the village to function</p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		as settlement gap (extent not clear, as off the map), the neighbourhood plan contains several settlement gap corridors. The depiction on the map suggests linear zones along some of the roads. It is unclear, how much area would be included within the settlement gap. Wider areas would be more effective in preventing coalescence.		
Policy SPTN 8 - Settlement Gaps				
V Durrant	If applicable	I completely agree with this policy, but will it have the necessary powers to prevent this happening.	Noted	None
H Davies	-	Creeping coalescence MUST be prevented. Might be worth including that the size of the Settlement Gap cannot be reduced in any direction.	The policies of the Neighbourhood Plan are strong enough without such additional wording.	None
C Fuller	-	There may need to be more than shown to deliver quality of life and sustainable development objectives accounting for comments made in this consultation response	Noted	None
J Pateman-Gee		<p>The word "help" implies failure is expected. Take out the word help.</p> <p>Why mention SPTN 1? This policy has no criteria to be in conformity with except to be in settlement boundary and this would be in direct conflict with the intention of this policy to have gaps of development so the village is not just a part of Ipswich.</p> <p>Take out help and sptn1 and we have a decent policy in terms of wording. I have never seen this tried before, normally the approach is having important views and local greens etc to achieve the same effect. This is far more direct. The risk is that the examiner will mine the nppf to find a way to dilute or remove this. Not least as it may read as restrictive to housing supply. Might be worth looking at the nppf with this in mind to see if anything else can be drawn in.</p>	<p>Happy with this</p> <p>Policy SPTN also allows development outside the Settlement Boundary where it is in conformity with the NPPF. Hence the reference.</p> <p>Policies of this nature have successfully been used in Neighbourhood Plans.</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>My suggestion would be to list the gap areas and importance. For example, The one to the river is a gap of importance due to main A14, river setting, the unique sproughton mill and church, and village use of the millennium green and it's rural village setting. Bramford direction is harder given the pigeon disaster and the development approved at Bramford....but maybe the last remaining field is the key point now. Around Red House is the value of this former grand farmstead and the one remaining connection of Church lane leading under the main road to the village.</p> <p>New wording could be:</p> <p><i>The open and undeveloped nature of the Settlement Gaps, as identified on the Policies Map, will be protected from development, other than agricultural use and householder development, to help prevent coalescence and retain the separate rural identity and character of the settlements. Development which is otherwise in conformity of all other policies of the Neighbourhood Plan will only be permitted within a Settlement Gap where:</i></p> <p><i>i. it would not undermine the physical and/or visual separation of the settlements; and</i></p> <p><i>ii. it would not compromise the integrity of the Settlement Gap, either individually or cumulatively with other existing or proposed development.</i></p>	<p>There is no need to do this as the gaps are shown on the Policies Map.</p>	
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	<p>No.</p> <p>It is clearly inappropriate to identify a Settlement Gap on a site that is allocated in the JLP (i.e. land East of Lorraine Way (Policy LA116)). As set out under question 1, the PPG is clear that where a Neighbourhood Plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between their policies. The inclusion of a proposed</p>	<p>In December 2021 the Joint Local Plan Inspectors instructed Babergh District Council not to proceed with the current allocations. Therefore the site in question (East of Lorraine Way) is no longer allocated.</p>	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		Settlement Gap on a site that is proposed to be allocated in the emerging Local Plan clearly demonstrates a failure to reach such an agreement and renders the Neighbourhood Plan contrary to the PPG and therefore to the basic conditions.		
	Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust	Draft policy SPTN8 (Settlement Gaps) seeks to prevent coalescence and retain the separate identity of "the settlements". Whilst the supporting text for this policy (paragraph 8.11) refers to preventing coalescence of the parish with the urban area of Ipswich and the villages of Bramford, Burstall and Copdock and Washbrook, the 'settlement gaps' as currently identified on the policies map do not reflect the evidence base. The SNP Landscape Appraisal refers to Ipswich and Bramford at section 4.7 of the document, but does not refer to the other settlements noted within the supporting text of the SNP, which are some distance from the settlement boundary. Notwithstanding the restrictions on development that are already imposed by Policy SPTN1, development within the majority of the "settlement gaps" as shown on the policies map would not result in coalescence of Sproughton with the neighbouring settlements. We therefore suggest that the policy is either deleted or the settlement gaps are revised to reflect the SNP Landscape Appraisal.	Development outside the Settlement Boundary would firstly have to conform with Policy SPTN1 and, should it meet those requirements, will then have to ensure that it would not result in coalescence of settlements. This seems a perfectly sound and justified planning approach.	None
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>2.27 Whilst we do not object to the principle of Policy SPTN 8, we object to the designation of parts of Hadleigh Road as a settlement gap and question how Policy SPTN 8 will be implemented.</p> <p>2.28 Policy SPTN 8 states that the open and undeveloped nature of the Settlement Gaps will be protected from development to help prevent coalescence and retain the separate identity of the settlements. It is unclear, however, how land along parts of Hadleigh Road and Church Lane are identified as fundamental in preventing coalescence of the Parish with the urban area of Ipswich and the villages of Bramford, Burstall and Copdock and Washbrook, noting the</p>	Development outside the Settlement Boundary would firstly have to conform with Policy SPTN1 and, should it meet those requirements, will then have to ensure that it would not result in coalescence of settlements. Given that the allocation for Wolsey Grange 2 (Policy LA013) is now being removed from the Joint Local Plan, the matter of coalescence from any future allocations will need to be addressed at that time.	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>physical barrier of the A14 and changing character from the underpass at Church Lane.</p> <p>2.29 The Pre-Submission SNP's supporting documents includes a Landscape Appraisal prepared by Alison Farmer Associates (February 2021). The Appraisal identifies important gaps and states at 4.7.2 that "an area where an open gap is important to retain a sense of separation is illustrated on Figure 4".</p> <p>2.30 Figure 4 does not identify Hadleigh Road or indeed land adjacent to Hadleigh Road as representing an Important Gap. There is no evidence to support the designation of a settlement gap along Hadleigh Road.</p> <p>2.31 Notwithstanding this, the settlement gaps shown on Map 5 would restrict parts of LA013 from being able to accommodate development. This would conflict with the Draft JLP as allocation LA013 contributes to the Draft JLP housing numbers. The designation of the settlement gaps along allocation LA013 would therefore not comply with Basic Condition e) under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).</p> <p>2.32 As set out above, the annotation on Map 5 is also unhelpful and unclear. It is not known whether the annotation is illustrating the frontage that is considered needing to remain free from development, or what area is considered to be identified as a "settlement gap".</p>		
	Suffolk County Council	<p>Policy SPTN7 Area of Local Landscape Sensitivity and SPTN8 Settlement Gaps are welcomed.</p> <p>While the Landscape Appraisal seems to suggest just one relatively large area to the north-east of the village to function as settlement gap (extent not clear, as off the map), the neighbourhood plan contains several settlement gap corridors. The depiction on the map suggests linear zones along some of</p>	<p>Given that any development is likely to result in construction along road frontages, this approach of indicating the important gap seems perfectly reasonable.</p>	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		the roads. It is unclear, how much area would be included within the settlement gap. Wider areas would be more effective in preventing coalescence.		
Policy SPTN 9 Protection of important Views				
V Durrant	If applicable	Again, I completely agree with this, but will our NP be sufficiently robust and have the power to follow this through.	Noted	None
P Wood	-	Although this was totally disregarded with regard to De Lorio	Noted	None
H Davies	-	Protection of longstanding views is critical - can we say that the extent & direction of the view must not be reduced.	The policy implies this	No
C Fuller	-	Needs to be set within the context of comments in this consultation response	Noted	None
D Taylor	-	Please also consider the important view of the parish and its setting coming over the brow of the hill on the B1113 past the entrance to the Beagle to the north east and north west	Has this been considered?	
C Taylor	-	Add the view northwards from the brow of the hill near the entrance to Premier Inn & Beagle	As above	
S Lavington	-	Map 6: important views (page 36). This map pays too little attention to the approach to Sproughton from the south along the B1113. Mature woodland, and in particular some fine oaks enjoying TPO status, surround listed buildings as the main area of High Street settlement is entered. These views have community value which should be recognised by appropriate symbols on Map 6. The general look and feel of the entrance to Sproughton village from the south is distinctive and needs to be preserved.	As above	
S Catermole	-	In particular for Hadleigh Road/Chantry Vale area.	Noted	None
J Pateman-Gee		This policy is guilty of referring to built up area and settlement boundaries. Are these the same or different? You need to ensure the language is consistent across the document. "Should" is a choice meaning that everything that follows this word can be ignored. Please make it required by using "shall" or even "must". The rest is subjective judgement. How about adding development over 7 metres will not be supported in		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		these important views areas or something similar that is tangible.		
	Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust	Policy SPTN9 states that “distinctive” views from public vantage points including those identified on the policies map, shall be maintained. It is unclear whether the use of the term “distinctive” as opposed to “important” is relevant. This should be clarified or alternatively we suggest that consistent language should be used to avoid confusion in respect of how the policy is applied in practice. Furthermore, we would suggest that the requirement to “maintain” views is inappropriate. This suggests that any change to an existing view is unacceptable, effectively creating a presumption against all development. Instead, the policy should require an assessment of the impact of proposals on views from public vantage points taking into account any mitigation that is proposed as part of the scheme. This approach will ensure that the key features of “important views” are preserved, whilst not preventing development where it is consistent with other policies in the SNP.	Change to important	
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>2.33 We do not object to the principle of identifying important views across the Parish and acknowledge Policy SPTN 9 in seeking to protect such views.</p> <p>2.34 We also acknowledge that there are important views along Hadleigh Road, which should be considered and assessed when delivering development on emerging allocation LA013.</p> <p>2.35 Planning Application (DC/21/02671) is supported by a Landscape and Visual Impact Assessment (LVIA), which assesses a number of viewpoints both across emerging allocation LA013 and from neighbouring areas and PROW.</p> <p>2.36 These viewpoints were discussed at length and subsequently agreed with the Councils’ Landscape Officer as needing to be assessed as part of the proposed development. Whilst viewpoints from the A1071 and A1214 were included, it</p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>is noted that those identified in the Landscape Appraisal prepared by Alison Farmer Associates (February 2021) and illustrated on Map 6, were not identified as viewpoints necessitating assessment by the Council.</p> <p>2.37 Each of the agreed viewpoints with the Councils' Landscape Officer were photographed and form part of the Technical Appendices underpinning the Environmental Statement, which supports the planning application.</p> <p>2.38 Views along the A1071, Hadleigh Road and A1214 were assessed as part of the LVIA. With appropriate mitigation, secured through the implementation of the Parameter Plans submitted with the application, the impact on such views would be no greater than moderate – slight adverse and not significant.</p> <p>2.39 The Council's Landscape Officer (30.07.2021) has also subsequently commented on the planning application and confirmed: "We agree with the assessed level of effect on landscape receptors...In terms of visual amenity, we agree with the chosen visual receptors and have no concerns regarding the number of viewpoints or verified views."</p> <p>2.40 We remained concerned that a number of the views identified within the Pre-submission SNP do not align with those requested from the Council as viewpoints needing to be assessed as part of a future application.</p>		
	Suffolk County Council	The policy refers to the identified views indirectly by referring to Map 6, which shows them. Part i. and part ii. are given a wider remit than the protection of specific views, and work towards a parish wide approach to safeguard the visual characteristics of the parish.		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		It would be easier to talk about the 19 individual identified views, if they had been systematically named and numbered and shown in photographs referenced to Map 6. Photographs could be in a supplementary evidence document.		
	Babergh District Council	<p>In SPTN9, at start of the first paragraph, replace the word 'Distinctive' with the word 'Important'. All the references on pages 36 and 37 are to important views, not distinctive views. The same generally applies to the separate Landscape Appraisal.</p> <p>Within the NP, but not necessarily in the policy itself, a numbered list of the Important Views, cross referenced to Map 6 and the Policies Maps would be helpful.</p> <p>There are some minor discrepancies between the locations of some views symbols on Map 6 compared with the Policies Map. We have identified the following, but you should check for others:</p> <ul style="list-style-type: none"> • On Map 6, no view shown looking south from Lower Street across the Millennium Green, but this is shown on the Village Centre Inset Map (pg 62) • On Map 6, the location of the two views west of Church Lane and associated with the footpath across the field between Red House to the south and Red House Cottages to the north. 	<p>Agree</p> <p>This is addressed in the separate Appraisal of Important Views</p>	
Policy SPTN 10 – Local Green Spaces				
V Durrant	If applicable	BUT- I do not see any mention of the large 'green' space of the 'Island site' now owned by IBC, and am concerned that this will be overlooked. (See also comments on question 29).	This site does not meet the Local Green Space criteria set by the NPPF.	None
C Fuller	-	Needs to be set within the context of comments in this consultation response	Noted	None
S Lavington	-	Map 8: Local green spaces (page 39). Too little attention is paid to the southern areas of the village, to either side (west and east) of the B1113. Based on NPPF criteria and especially on the well-used footpath connecting High Street to the sports field and the primary school, Monks	These spaces do not meet the Local Green Space criteria set by the NPPF.	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		Wood should definitely have been included on Map 8 and listed in Policy Spin 10 (page 40).		
J Payeman-Gee		<p>In this policy the local greens are in fact listed and I would recommend the same approach with local significant buildings and important views.</p> <p>However, the fundamental issue with this that once listed there is nothing to say what was the point of being a green in the policy. I assume the idea is that no development or limited development is proposed/supported for these areas, but this doesn't say that this is the intent in the policy itself. Please don't rely on the nppf as that is guidance, put a solid requirement of protection in the policy.</p>		
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>2.41 Policy SPTN 10 identifies a number of Local Green Spaces, which includes a "Green triangle at the junction of Hadleigh Road with First Strokes swimming pool" (Green Space 10).</p> <p>2.42 Paragraph 102 of the NPPF (2021) states that a Local Green Space designation should only be used where the green space is:</p> <ul style="list-style-type: none"> a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land <p>2.43 Green Space 10 is approximately 395m2 and represents a thin strip of highway verge on the edge of Hadleigh Road. The Pre-submission SNP Green Spaces Assessment (prepared by the SNP Sub-Committee) recognises the highway verge as not being demonstrably special to the local community and does not hold a particular local significance. The highway verge lies within the ownership of the Highways Authority (see Appendix Three), it is unclear whether appropriate engagement has been undertaken with the Highways Authority. This area is subject to</p>	I tend to agree with them	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>change as part of the development proposals at Land North of the A1071 (LA013) to ensure that access for all users can be delivered safely including those using the existing facilities. As those discussions have taken place with Suffolk County Council, we consider this space cannot be designated.</p> <p>2.44 The Pre-submission SNP Green Spaces Assessment (prepared by the SNP Sub- Committee) goes on to state that the highway verge is historically significant noting its position next to a farm building. The said farm building has no historical significance and therefore fails to meet this element of Paragraph 102 of the NPPF (2021).</p> <p>2.45 Policy SPTN 10 therefore fails to meet Basic Condition a) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011) as it does not accord with the NPPF (2021).</p> <p>2.46 Notwithstanding this, land adjacent to the First Strokes swimming pool is allocated for development under emerging allocation LA013 in the Draft JLP. The emerging allocation recognises that there may be a need for highway improvements to deliver the emerging allocation.</p> <p>2.47 Noting that the aforementioned highway verge fails to meet the criteria set out within the NPPF (2021) paragraph 102, it would appear that the Pre-submission SNP proposal to designate a highway verge adjacent to the emerging allocation as a Local Green Space is seeking to prevent the LA013 from being delivered, therefore also conflicting with Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).</p>		
	Suffolk County Council	The provision of the designated Local Green Spaces in Policy SPTN10, and Open Space Sports and Recreation in Policy	Noted	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>SPTN19, is welcomed. There are proven links² between access to green outdoor spaces and the improvements to both physical and mental health and wellbeing for the population as a whole, including increasing the quality of life for the elderly, working age adults, and for children.</p> <p>² https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5663018/</p> <p>SCC welcomes the designation of Local Green Spaces in Policy SPTN10 and Map 8 and the Policies Map, as this supports the ongoing work to make Suffolk the Greenest County³</p> <p>The Green Spaces Assessment on the Parish Council website justifies the designated Local Green Spaces based on the NPPF, which is welcome by SCC. There could have been greater evidence to demonstrate why the green spaces are important to the parish/ residents, in the 'demonstrably special to the local community and hold a particular local significance' sections of each of the tables.</p> <p>The selection of the final ten sites out of the qualifying 26 sites needs to be documented more clearly, to explain why sixteen of the sites were rejected as local green spaces despite meeting the criteria as set out in the NPPF.</p> <p>It is not clear why the size limitation imposed of the proposed spaces as 2.5ha. The OSS4 gives the following guidance 'The areas would normally be fairly self- contained with clearly-defined edges. Blanket designation of open countryside adjacent to settlements will not be appropriate.'</p> <p>³ https://www.suffolk.gov.uk/planning-waste-and-environment/greenest-county</p>		
	Babergh District Council	<p>This policy lists ten Local Green Spaces (LGS), the locations for which are identified on Map 8 and on the Policies Maps. We make no comment on the policy itself but do make with a general comment about the quality of maps at the end of this table so refer you to that.</p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>We question the allocation of site # 10 (Green triangle at junction of Hadleigh Rd) based on the information set out in the Green Space Assessment. This states that the land has no ecological significance and that it is not demonstrably special to the local community. On that basis alone, it fails to meet the second criteria set out in NPPF para 102 and should be deleted. On a lesser point, is it just pure coincidence that this area has been identified as a LGS given the Wolsey Grange 2 application situation?</p> <p>As a closing paragraph we recommend you include: “Development in the Local Green Spaces will be consistent with national policy for Green Belts.”</p>		
Policy SPTN 11 – Biodiversity Protection and Enhancement				
J Webb	-	But consideration to up keep of trees and hedgerows? Parish Council 1 tree £750 to maintain Hawthorn Hegde at No 17 CL (Church Lane?) £300 one cut.	Noted	None
C Fuller	-	The list of (a) - (c) provides examples that are very small-scale. The aspiration should be elevated to ensure Sproughton delivers more because it has the potential & key assets. At a basic level, the objective should be to significantly conserve & enhance the existing resource through more ambitious objectives to help address biodiversity loss to meet government net gain/nature recovery objectives and contribute to quality of life/well-being & sustainable communities objectives. For example, this should be through the creation and safeguarding of new habitat for biodiversity, particularly to increase connectivity and extent of wildlife corridors and to conserve & enhance existing nature conservation sites.		
S Catermole	-	In particular the planting of additional tree /hedgerows.	Noted	None
J Pateman-Gee		This policy, despite the should word, is good. I could offer that measuring a new net gain is very hard, not least as the baseline to measure from is different for every site. Also there is nothing stopping a developer from clearing a site of all ecology value prior to making an application. However, there is very little that	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>can be done about this. The only thing I could suggest is a standard requirement for bee bricks, swift boxes etc for every house and this could go in the design requirements.</p>		
	<p>Boyer on behalf of Taylor Wimpey UK Ltd</p>	<p>2.48 We support both Policy SPTN 11 and SPTN 12 relating to biodiversity protection and enhancement and also recreational disturbance avoidance and mitigation, which aligns with the Draft JLP (specifically SP09).</p> <p>2.49 Draft JLP allocation LA013 and application (DC/21/02671) provides a measurable net gain in biodiversity through the creation of new habitats, and will also be contributing to Recreational Disturbance Avoidance and Mitigation as well as providing circular walks, informal and formal areas of open space and dog walks. This is confirmed within the Environmental Statement (Chapter 8) and Shadow HRA that support the associated planning application (DC/21/02671).</p>		
	<p>Suffolk Wildlife Trust</p>	<p>We are pleased to see that the Sproughton Neighbourhood Plan recognises the importance of biodiversity and proposes measures to protect and enhance it within Policy SPTN 11. As stated within the National Planning Policy Framework (NPPF) (2021), development should seek to provide biodiversity net gain, so it is encouraging that this is recognised within the Parish. A minimum requirement of 10% net gain in biodiversity; whilst not yet formally required by law, is contained within the recently passed Environment Act and this level is already being implemented as good practice across the country. Therefore, we recommend that the Sproughton Neighbourhood Plan should require developments to seek a minimum of 10% biodiversity net gain and this should be stated within Policy SPTN 11.</p> <p>Map 7 – Green Infrastructure Network, highlights ecological networks within the parish, however protection and enhancement of these specific ecological networks is not referenced within Policy SPTN 11. We recommend that the introductory sentence within Policy SPTN 11 is expanded to</p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>include the river and green corridors as highlighted in Map 7, to ensure that development does not impact these key ecological networks within the parish.</p> <p>Policy SPTN 11 should also reference safeguarding protected species, as well as Priority Habitats and Species as listed within The Natural Environment and Rural Communities (NERC) Act 2006 from future development. We recommend including key Priority Habitats and Species for Sproughton Parish within Policy SPTN 11 to ensure strengthened protection. For example, stag beetles and reptile species such as slow worm and grass snake are UK Priority Species with good populations within the parish. Other key species for the parish should be identified and specifically mentioned within the plan in order to provide better protection and require developers to provide targeted enhancements for key species and habitats. Sproughton parish also has a good resource of Ancient Woodland, therefore protection and enhancement of this Priority Habitat should be highlighted within the policy, as these irreplaceable habitats need buffering from development pressures in perpetuity.</p>		
	Ipswich Borough Council	<p>To highlight the necessity of achieving biodiversity net gain, it is suggested for presentation purposes that the requirement for biodiversity net gain be moved to the start of the policy and not the end.</p> <p>On the matter of biodiversity net gain, the “for example” criteria appear to read as more of a checklist, i.e. that if you provide one of these three suggestions the development will be supported. Obviously, there are a multitude of different means of achieving biodiversity net gain and they will vary drastically depending on the nature of the development, the site characteristics and its surroundings. Subsequently it is recommended that the three criteria are removed and instead used in the reasoned justification paragraphs as examples to provide applicants with potential ideas.</p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>It also needs to be specified what a “measurable net gain” in biodiversity is. It is assumed that this is 10% as per the Environment Bill but this needs to be clearly stated in the policy.</p>		
	Suffolk County Council	<p>SCC welcomes Policy SPTN11 and the other mentions of biodiversity protection throughout the plan, particularly in the objectives and Policy SPTN17</p> <p>The following amendment is proposed to improve clarity for the reader to Policy SPTN11: “Otherwise, acceptable Development proposals will be supported where they provide a measurable net gain in biodiversity through, for example ...”</p> <p>The policy could also ask for the use of a standard biodiversity metric.</p>		
Policy SPTN 12 - Recreational Disturbance Avoidance and Mitigation				
P Powell	-	<p>I have already objected to the RAMS policy in relation to the JLP. Habitats Regulations Assessment/ NPPF/Gov guidance requirements for development in the zones of influence of designated habitat/wildlife sites set a hierarchy of measures that starts with impact avoidance and as its last resort considers mitigation payments. Natural England and NPPF clearly recommend Habitat Impact avoidance as the first consideration and this can be avoided by creation of SANG’s (Suitable Alternative Natural Greenspace provision). This can preserve the best of an area for the recreational use of all the new residents of housing development and existing residents thereby diverting recreational users away from the Orwell Habitat sites. I have no Idea why this first recommended option doesn’t even seam to have been considered in the JLP. But it should be at</p>	<p>This policy is already agreed across a number of districts and it is not appropriate to propose amendments to it in the Neighbourhood Plan.</p>	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		the top of our options for local development to ensure as much local green space as possible.		
C Fuller	-	Needs to align with comments in this consultation response	Noted	None
J Pateman-Gee		Duplicate of the current provisions of the district council and duty of all decisions to consider by the LPA. Totally pointless if repeated in a NP.	The policy is yet to be in an adopted Local Plan for the area.	None
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>2.48 We support both Policy SPTN 11 and SPTN 12 relating to biodiversity protection and enhancement and also recreational disturbance avoidance and mitigation, which aligns with the Draft JLP (specifically SP09).</p> <p>2.49 Draft JLP allocation LA013 and application (DC/21/02671) provides a measurable net gain in biodiversity through the creation of new habitats, and will also be contributing to Recreational Disturbance Avoidance and Mitigation as well as providing circular walks, informal and formal areas of open space and dog walks. This is confirmed within the Environmental Statement (Chapter 8) and Shadow HRA that support the associated planning application (DC/21/02671).</p>		
	Ipswich Borough Council	<p>It would be beneficial in the reasoned justification of this policy to identify that the financial contribution towards mitigation measures to address the impact of new housing development on internationally designated sites is £121.89 per property based on the current RAMS strategy. This would provide applicants with certainty upfront about the required contribution.</p> <p>The policy should also make clear that additional mitigation beyond the financial contribution may be required for larger schemes as per the agreed RAMS strategy.</p>		
Chapter 8 Natural Environment General Comments				
V Durrant	If applicable	Paras 8.14 & 8.15 and map7 could be the place in the NP where the Green Infrastructure of the 'Island Site' could be detailed for protection and also included on Map 7. It could even be shown on Map 9 as a specific heading of 'Nature Reserve'. (Although		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		mentioned in para 8.2, 'Biodiversity', I believe it should be included on one of the detailed maps to ensure its identity is highlighted and hopefully protected.		
H Davies	-	The documentation of wildlife corridors in the parish is important so that any proposed development can be assessed against this.	Noted	None
R Hardacre	(Babergh District Council Councillor)	Good that Wildlife corridors gets a mention but a bit more detail would be good, e.g. ensuring link between Chantry Park and Gipping	Noted	None
P Powell	-	Note re Map 7: I have spoken with the architect of the Havens Gateway green Corridors and I would suggest that the potential Green Corridor Project shown is a little inaccurate, though is generally indicative. The intention was to show a greenway linking Chantry Vale up with Berlstead meadows to maintain a continuous green(ring) corridor around Ipswich within the developing area/A14. Therefore terminating at the bottom closer to the Copdock Roundabout where Bedstead Meadows wraps round the South end of the Pinewood development. However I understand this is now being interpreted by developers as a green route following the cycle path from the A14 underpass old route of London Road through to Chantry Park? The two flowers are projected green areas on the SEP (Chantry Cut Island) and a county park envisaged in Chantry Vale.		
C Fuller	-	8.22 - Needs to adjust text 'In Sproughton parish appropriate development proposals that deliver such improvements will be encouraged' Delivering Sustainable developments and maintaining Sustainable Communities should not involve accepting impacts & compromises at the outset, it is about ensuring there are appropriate 'win/win/win' solutions for environmental/economic/social outcomes that delivers net environmental gain in step and in credit and a high quality of life & good well-being at the local level.		
G Armstrong	Armstrong Rigg Planning on	No opinion	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
	behalf of Hopkins Homes			
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>2.50 In addition to our concerns with regards to the valued landscape designation, we also raise concerns with regards to Map 7 of Chapter 8, which relates to “potential site based green infrastructure projects”. In addition to our concerns with regards to the designation of a “potential site based green infrastructure project” on allocation LA013, Map 7 is unclear and is not considered to represent an effective tool in the decision making process.</p> <p>2.51 It is unclear what is meant by “green infrastructure projects”. It is noted that Paragraph 8.16 of the Pre-submission SNP suggests that investigations into possible green infrastructure projects will begin after the Neighbourhood Plan has been drafted, which will seek to improve accessibility; enhance biodiversity; and provide health benefits.</p> <p>2.52 It is considered that insufficient information has been provided to demonstrate that the intention to designate an area of land on allocation LA013 to accommodate a green infrastructure project could have on the delivery of the allocation. We therefore raise concerns as to whether Map 7 – Green Infrastructure Network aligns with the Draft JLP (allowing for the full delivery of allocation LA013 to meet the Draft JLP housing numbers) and therefore accords with Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).</p>		
	Ipswich Borough Council	Map 7 Green Infrastructure Network does not indicate the potential green corridor projects within Ipswich and suggests that it terminates at the edge of the Borough. It is recommended that Green Corridor Project I of the emerging Ipswich Local Plan is hatched onto Map 7 to demonstrate how the projects would link up. A copy of the Borough’s Green		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>Corridors map can be viewed here - https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/plan_6_green_corridors.pdf</p> <p>In addition to the above, the map itself feels too detached from its relevant Policy SPTN 21. It is recommended that either this map is moved to sit adjacent to Policy SPTN 21 or vice-versa.</p> <p>Map 7 'Potential site based green infrastructure projects' includes a sunflower symbol in the middle of the Sproughton Enterprise Park. It is presumed that this is with reference to the 'Island site' local nature reserve, and it is recommended that this be relocated to reflect this better.</p>		
	Suffolk County Council	<p>Green Infrastructure</p> <p>The Household Survey (2020) indicates that 97% of the residents [or of those who replied] find Green Spaces in and around the parish important (paragraph 2.13).</p> <p>Map 7 Green Infrastructure illustrates areas for green corridors and GI projects. A brief summary on these within the narrative of the plan would be a useful addition to the plan.</p> <p>The Landscape Appraisal identifies four landscape corridors, which are referred to in paragraph 8.9; they are described as intact. These four corridors (The Grindle, The Gipping Valley Floor, Abbey Oaks and Sproughton Hall) could also be identified in the GI section and on Map 7. If they are the potential corridors shown (or part of these), it would be helpful to have them identified with a label, to get a more complete picture.</p>		
	Babergh District Council	<p>Page 31</p> <p>Amend the '(Source: *****)' description in the graph to read 'Household Survey'</p> <p>Para 8.4</p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>It might help to specifically direct readers to look at Figure 2 in the 'Landscape Appraisal (Feb 2021)' document.</p> <p>Para 8.9 In the last sentence, the cross reference should be to Map 4.</p> <p>Para 8.10 Typo. At end of the first paragraph, it should read 'designation:' {Nb: We include the colon given that what follows is a quote from the relevant AFA document.}</p> <p>Para 8.13 Suggest fully justify so this occupies the whole page width (as per para 8.12)</p>		
Policy SPTN 13 – Heritage Assets				
P Wood	-	Although more awareness should be shared with people moving into the Parish	Noted	None
C Fuller	-	Needs to align with comments in this consultation response	Noted	None
J Pateman-Gee		<p>The only flaw in this application is point f.</p> <p>Firstly, setting validation requirements for planning applications is not the role of a policy. This will likely be picked up in the examination if not removed.</p> <p>Second, this is essentially a copy of Para 198 of the current nppf, but the nppf says "should" and not "must". This is ironic as I have been saying to remove "should" and in fact this policy is stronger other policies in the NP in that regard. However, the risk due to the NPPF in this specific matter is that an inspector will take the nppf version, as the NP wording essentially conflicts by being a prescription requirement compared to the nppf version.</p>		
G Armstrong	Armstrong Rigg Planning on	<p>No.</p> <p>Criteria a. of the policy states that proposals must preserve or enhance the significance of the heritage assets of the parish,</p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
	behalf of Hopkins Homes	their setting and the wider built environment. This is clearly not in accordance with national policy which allows harm to heritage assets in certain circumstances where it is outweighed by the benefits of proposed development (e.g. NPPF paragraph 202). This policy does not therefore meet the basic conditions of having regard to national policy.		
	Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust	Draft policy SPTN13 (Heritage Assets) states that “all proposals must preserve or enhance the significance of the heritage assets of the parish; their setting and the wider built environment”. The language used within the emerging SNP, as currently drafted, is inconsistent with the NPPF. Paragraph 202 of the NPPF states that where a development proposal will lead to “less than substantial harm” to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. As such, a proposal that results in harm to a designated heritage asset may be acceptable in some circumstances. By requiring all proposals to preserve or enhance the significance of the heritage assets of the parish, draft policy SPTN13 is inconsistent with the NPPF. We would suggest that the draft SNP policy is amended so that it is consistent with national planning policy.		
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>2.53 We object to Policy SPTN 13, particularly criterion b), which seeks retention of valued landscape areas. We have fundamental concerns with regards to this designation and associated criterion b) which would prevent development from coming forward on large swathes of allocation LA013, and directly conflict with the Draft JLP, thereby failing to meet Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).</p> <p>2.54 Moreover, the AECOM Design Guidance and Codes supporting document suggests that the majority of buildings within Sproughton are between 2 and 2.5 storeys. This fails to acknowledge the 3 storey dwellings that have been recently</p>	<p>Policy LA013 of the emerging Joint Local Plan now has no status as the District Council has agreed with the Local Plan Inspectors that it and all other new allocations should not be included in the current Joint Local Plan document. There is no requirement for the Neighbourhood Plan to allocate these sites.</p> <p>The majority</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>approved and considered acceptable on the development at Wolsey Grange 1. When developed, this will introduce 3 storey development to the Hadleigh Road Community area.</p> <p>2.55 The Draft JLP technical evidence base that supports allocation LA013 includes a Heritage Impact Assessment (HIA) prepared by LUC. It is acknowledged that parts of LA013 are sensitive in heritage and landscape terms. As set out in the HIA prepared by LUC, "detailed design and careful location of the development parcels could minimise this level of harm." This has been demonstrated through planning application (DC/21/02671), which seeks approval of a number of Parameter Plans that have been informed by landscape and heritage assessments, and restrict the development parcels to the least sensitive areas of the Site. This is an approach which has been discussed extensively with the Councils' appointed Heritage and Landscape Officers.</p>		
	Ipswich Borough Council	<p>Policy SPTN 13 requires proposals to "preserve or enhance" heritage assets within the Parish. This wording could be strengthened to "preserve and enhance". Furthermore, there are a number of designated and non-designated heritage assets which sit outside the parish boundary. Due to the proximity of these sites to the parish boundary it is not unreasonable to consider that the setting of these heritage assets could be impacted by development taking place within Sproughton. The Policy should therefore be amended to afford protection to the setting of heritage assets beyond the Sproughton parish boundary for example the Listed Chantry Park which is also a Conservation Area.</p>	Agree. The Policy will be amended	Amend Policy SPTN 13
	Babergh District Council	<ul style="list-style-type: none"> • Insert '<u>designated</u>' before 'heritage assets' in opening para' and in criterion a. • In criterion b., 'character or appearance <u>of</u> the parish' would be better than 'character or appearance within the parish' <p>Regarding criterion f., the Council's Heritage Team have advised that it is not simply by submitting a heritage statement that</p>	<p>Agree</p> <p>Agree</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>harm would be justified and that it would be the content of the heritage statement that may or may not justify it. They also suggest:</p> <ul style="list-style-type: none"> • "... through the submission of a heritage statement..." may be the wrong phrase to use here and this could be removed from the rest of the paragraph. Also, if the requirement of point f. is met, then the requirement to meet some of the other points would not be required. It may be necessary to update some of the wording to reflect this., and • that criterion f. should refer to 'clear <u>and convincing</u> justification' rather than just 'clear justification,' to match NPPF para 200. <p>Such an approach would lead to wording that now differs from what has come forward of late by way of this policy criterion in other NPs and means that, in practice, it might read: 'provide clear and convincing justification for any works that would lead to harm to a heritage asset and yet be of wider substantial benefit.'</p>	<p>Let's change it and see what the Examiner makes of it</p>	
Policy SPTN 14 – Buildings of Local Significance				
P Wood	-	See my comments re 19	Noted	None
C Fuller	-	Needs to align with comments in this consultation response	Noted	None
J Pateman-Gee		Great. A development plan document, eg NP in this case, has to power to create a local list for non for non designated assets. So I personally would list the buildings in the policy itself to ensure this is confirmed as the case and there is no argument. .	Noted	None
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	<p>No.</p> <p>The policy states that "Proposals for any works that would lead to the loss of or substantial harm to a local heritage asset or a building of local significance must be supported by an appropriate analysis of the significance of the asset to enable a balanced judgement to be made having regard to the scale of any harm or loss and the significance of the heritage asset."</p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>We object to this policy on the grounds that the accompanying document on Buildings of Local Significance designates almost every building on Lower Road with no assessment as to why the building is of local historical significance. If the Neighbourhood Plan is seeking to protect buildings that are not designated as listed buildings, then the burden of presenting evidence to demonstrate their significance falls on the Neighbourhood Plan and not future applicants for planning permission.</p>		
	<p>Boyer on behalf of Taylor Wimpey UK Ltd</p>	<p>2.56 Policy SPTN 14 would appear to align with National and Local Policy as required, however it would be helpful if the local significance buildings are referenced in the Pre-submission SNP, by way of appendix or similar.</p>	<p>A separate Assessment will be published at the time the Plan is submitted.</p>	
	<p>Babergh District Council</p>	<p>SPTN14 (and supporting documents) In the second paragraph, the word 'substantial' should be dropped.</p> <p>The Council's Heritage Team point out that, per NPPF para 194, all applications should contain a suitable heritage statement, regardless of the level of harm and that this applies to any heritage asset, meaning designated and non-designated. Similarly, they point out that NPPF para 203 refers to 'any harm,' and not just substantial harm.</p> <p>Given that this paragraph in policy SPTN14 is also identical to that of the second paragraph in the submitted Little Waldingfield NP (see policy LWD 12, pg 26), note should also be taken of commentary on this by the Examiner of that Plan (see text immediately preceding and first bullet on pg 26 of the Final Exam Report) and the same modification implemented.</p> <p>References:</p> <ul style="list-style-type: none"> ▪ https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Little-Waldingfield-NP-Sub-Draft-Sept20.pdf ▪ https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Little-Waldingfield-NP-Exam-Report.pdf 	<p>Agree</p> <p>Amend</p> <p>Agree the amendment should be made</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
Policy SPTN 15 – Sproughton Parish Special Character Area				
H Davies	-	Where 'scale' is mentioned can we included (height, width & length)	NO!	
J Webb	-	My Grandad and dad built it.	Noted	None
C Fuller	-	It would be more effective and holistic, if this plan and associated local plans sought to promote & enhance the environmental quality of all of this area through appropriate traffic management & pedestrian safety measures etc, aligned with comments in this consultation response. The value of this village hub area to the identity of this village should be harnessed as a foundation for enhancement (consistent with delivering quality of life, well-being & sustainable communities objectives) rather than eroded by focusing on short term quantitative targets that are regarded as non- sustainable development fro reasons set out within this consultation response	Noted	None
S Lavington	-	Map 10: Sproughton special character area (page 47). The shaded area on this map does not go far enough southwards along the B1113, thus missing out key areas of woodland (including TPO'd trees) and historically interesting buildings to the east and west of the road, including Monks Gate and Monks Wood, up to and including Rivers Farm cottages. The shaded area should be appropriately extended southwards before the Parish Council asks Babergh District Council to designate a Conservation Area.	It is not considered that the features referred to are appropriate for inclusion in the identified Special Character Area given the development that is located in between them.	None
M Levett	-	i have queried why Map 10 limits the North end of the Special Character Area to the mid point of Cardinal Field. I assume it is because there is a post and wire fence, arbitrarily fenced to separate grazing.	IS THERE A REASON – NOT THAT THERE IS JUSTIFICATION TO EXTEND ANY FURTHER NORTH!	
J Pateman-Gee		Not a conservation area yet, but trying to be. Not sure what an examiner is going to make of this approach, but have a go.	Noted	None
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No. There is a set statutory process for designating conservation areas and it is important that this is followed. It is not appropriate for the Neighbourhood Plan to try and fast track	This is a designation that does not pretend to be a conservation area but seeks that development	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>this process.</p> <p>Paragraph 9.6 states that: "A separate "Special Character Area Appraisal" is being prepared to describe its special architectural and historic interest and within it, development proposals will need to demonstrate how they preserve and enhance the special characteristics of the area". It is clear from this that the Neighbourhood Plan has not even undertaken the necessary technical work to identify why (or indeed if) this area is of special character. The PPG is clear at ID: 41-072 that draft Neighbourhood Plans should be supported by sufficient and proportionate evidence. Until this evidence is produced, this policy cannot be said to meet the basic conditions as it fails to accord with national guidance.</p>	proposals recognise the character of an area that, combined, have special and locally distinct qualities.	
	Boyer on behalf of Taylor Wimpey UK Ltd	2.57 We have no comments to make with regards to Policy SPTN 15 and the Parish's Community Action 1.	Noted	None
	Ipswich Borough Council	As above Policy SPTN 15 requires proposals to "preserve or enhance" heritage assets within Sproughton. This wording could be strengthened to "preserve and enhance". Paragraphs 9.6 and 9.7 already refer to the need to "preserve and enhance" the Special Character Area, so there is currently a discrepancy between the supporting text and policy wording.	Agree	
Community Action 1 – Conservation Area				
H Davies	-	Believe there is more than one area in the parish that should be conserved e.g. Red House Farm and Sproughton Manor & surrounding parkland	It is unlikely that these areas would meet the Historic England definition for conservation areas	None
C Fuller	-	Needs to be set within the context of SPTN15 and comments in this consultation response	Noted	None
S Lavington	-	Map 10: Sproughton special character area (page 47). The shaded area on this map does not go far enough southwards along the B1113, thus missing out key areas of woodland (including TPO'd trees) and historically interesting buildings to the east and west of the road, including Monks	It is not considered that the features referred to are appropriate for inclusion in the identified Special Character Area	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No opinion.	Noted	None
	Boyer on behalf of Taylor Wimpey UK Ltd	2.58 We have no further comments to make on Chapter 9.	Noted	None
	Suffolk County Council	<p>Archaeology</p> <p>Paragraph 9.4 gives a good indication on the long history of the parish whilst clearly stating SCC Archaeological Service should be consulted at an early stage with regards to below ground heritage, which is welcomed.</p> <p>It is suggested that the plan could note in this paragraph that the Historic Environment Record maintained by Suffolk County Council Archaeological Service contains further information about the history of the parish, found here: https://heritage.suffolk.gov.uk/.</p> <p>Following the link, people will be able to see the publicly accessible records within the Historic Environment Record of Suffolk and be able to see the HER records for Sproughton.</p> <p>Housing Allocations</p> <p>LA012 Land north of Burstall Lane, West of Loraine Way. This site has had first phase pre application archaeological evaluation which identified the presence of ring ditch and other archaeological features. The site requires a second phase of archaeological evaluation followed by mitigation by condition (application has been submitted already)</p> <p>LA013 Land North of A1071. This site has had first phase pre application archaeological evaluation. The site requires a second phase of archaeological evaluation followed by mitigation by condition</p>	<p>Paragraph 9.4 already refers to the Historic Environment Record.</p> <p>These sites are not allocated in the Neighbourhood Plan</p>	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>LA014 Land at Poplar Lane. Archaeological fieldwork has been completed, SCCAS are currently waiting the post excavation work to be completed and for the report to be submitted for approval. This is covered by conditions.</p> <p>LA116 Land east of Loraine Way. This site has had an archaeological evaluation which identified the presence of a ring ditch and Saxon features. The site requires archaeological mitigation by archaeological excavation.</p>		
	<p>Babergh District Council</p>	<p>Para 9.2 The third and fourth sentences should be combined to read as one. As separate sentences they do not make sense. Also, it should refer to 'special regard' not just 'regard,' to reflect s.16 and s.66 of the P(LBCA) Act 1990.</p> <p>Para 9.7 It is not clear what 'subservient to its setting' (second bullet point) would mean in practice. 'Subservience' can be used in relation the scale, design, function etc. of a building relative to another building, but we are not sure how you would compare, for example, the scale of a building with the scale of a 'setting'?</p> <p>Can the Parish Council confirm which of the reference documents listed on this page http://sproughton.onesuffolk.net/neighbourhood-plan/reference-documents is the one referred to as 'K. Sproughton parish Special Character Area Appraisal' on their main consultation webpage.</p>	<p>Agreed. Para 9.2 will be amended.</p> <p>Agree that this needs looking at</p> <p>Need to tidy this up</p>	<p>Amend Para 9.2 as follows: In considering whether to grant planning permission or listed building consent for development that has an impact on a listed building or its setting, regard must be had to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
Policy SPTN 16 – Development Design Considerations				
V Durrant	If applicable	It is important for any new development to provide 'sufficient' off-road parking (drives or garages) to try and avoid what has happened on most new developments, that parking on roads/footways is accepted as the norm. This could result in delays to / the obstruction of public service vehicles from attending sites.	Noted	None
J Tuppen	-	Houses shouldn't be higher than 2 storeys and warehouses & business premises heights should be restricted to be in line with other nearby business premises. The height of the La Doria warehouse MUST not be used as a precedent as it is completely out of line with other warehouses in Suffolk and most of the UK.	Noted	None
C Fuller	-	Needs to be set within the context of comments in this consultation response	Noted	None
S Catermole	-	Broadly agree but must (F) enhance the safety of the highway network. Just maintaining is not enough where the existing highway network is not safe or robust enough. Wording to "enhance" and not include "maintain".	Noted	None
J Pateman-Gee		<p>When a design policy is put together it tries to capture all, but the best ones break down what development they are aiming at. This policy doesn't break it down and so will have elements to work out if they apply or not, eg what applies if you are looking at a porch or hundreds of housing. Instead, this needs to to consider commercial, residential, industry, agricultural, household and also in the terms of outline, full and reserved matter applications.</p> <p>The appendix checklist are not requirements as the policy reports. Instead, it's a list of questions and so any answer will satisfy this policy (if you dont like the answer or not is not the point). Sadly in any event by putting "as appropriate" you have given the choice of even answering or not to the developer anyway, regardless of the fact you may not like the answer. .</p>	<p>The policy states "proposals will be supported where, as appropriate to the proposal, they:..." which makes it quite clear that not all elements will apply to every planning application. It is not possible and unreasonable for a policy to set out which elements will apply to every potential type of planning application.</p> <p>This is a matter for planning officers dealing with an application to consider, as was demonstrated in a recent decision at Botesdale in Mid Suffolk.</p>	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>So in this case we have the checklist to be demonstrated that doesn't need to be, but then we have additional elements that don't need to be demonstrated in the policy, but will be supported if they were proposed. However, nothing to say the proposed development will be not supported if none of this policy is complied with. This whole policy is undermined by the word "should" and similar words and means the whole thing is an option for developers. This needs urgent review!</p> <p>I have looked at the checklist and it's questions and it achieves very little, I have skipped to the following design requirements themselves in the actual policy:-</p> <p><i>a. recognise and address the key features, characteristics, landscape/building character, local distinctiveness, and special qualities of the area and/or building and, where necessary, prepare a landscape character appraisal to demonstrate this;</i></p> <p>While the policy doesn't require any notice to be taken of these matters, part a again provides no guidance for a landscape character appraisal. Where necessary is pointless unless you state where and when necessary. The rest is subjective judgement.</p> <p><i>b. do not involve the loss of gardens, important open, green, or landscaped areas, which make a significant contribution to the character and appearance of that part of the village;</i></p> <p>Sort of ok. Someone might argue that gardens are previously developed land and the best place for new development. However, the link is to its actual contribution to the village and so gardens that don't contribute would be fine. A very clever developer might realise that this only refers to the village and not the wider neighborhood plan area.</p>	<p>Noted</p> <p>These points are noted.</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p><i>c. taking mitigation measures into account, do not affect adversely:</i></p> <ul style="list-style-type: none"> <i>i. any historic character, architectural or archaeological heritage assets of the site and its surroundings,</i> <i>ii. important landscape characteristics including trees and ancient hedgerows and other prominent topographical features as set out in the landscape appraisal,</i> <i>iii. identified important views into, out of, or within the village as identified on the policies map, and</i> <i>iv. sites, habitats, species and features of ecological interest;</i> <p>Ok, these are generally the material considerations. Nothing wrong with listing them I suppose.</p> <p><i>d. do not locate sensitive development where its users and nearby residents would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented;</i></p> <p>Fails to say what is sensitive development and in what context. Also this is confusing as it talks about new development impact and then moves on to forms of pollution from existing. Good to have both, but split these apart and it will be stronger.</p> <p><i>e. produce designs that respect the character, scale, and density of the locality and, for new dwellings, ensuring garden sizes are proportionate to the character of the area;</i></p> <p>Good enough, but I would have added, "with a minimum of 79sqm of amenity excluding any parking". Something tangible!</p> <p><i>f. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that road layouts do not dominate the area, that all vehicle parking is provided within the plot and seek always to ensure permeability</i></p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p><i>through new housing areas, connecting any new development into the heart of the existing settlement;</i></p> <p>Goodbye parking courts forever! This is strong and might be very good if the beginning of this policy and the word "should" can change to ensure this is a requirement.</p> <p><i>g. where appropriate, incorporate sustainable drainage systems including, where feasible, rainwater and storm water harvesting and not result in water run-off that would add to or create surface water flooding;</i></p> <p>Where appropriate....who decides?</p> <p>In the end why not require rainwater recycling for all development.....and not just housing. Again get a minimum tangible gain for good design and climate change.</p> <p><i>h. where appropriate, make adequate provision for the covered storage of all wheelie bins and for cycle storage, including cycle charging points, in accordance with adopted cycle parking standards;</i></p> <p>Again where appropriate! Why not say required and let the exceptions come forward as needed.</p> <p>Ps - What are the adopted cycle standards? If the parish means SCC parking standards, these are not adopted by mid Suffolk.</p> <p><i>i. include suitable ducting capable of accepting fibre to enable superfast broadband; and</i></p> <p>Good</p> <p><i>j. provide one electric vehicle charging point per new off-street parking place created.</i></p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>Good.</p> <p>A few potential gains may come forward as part of this policy, more if strengthened, but what the following...</p> <ul style="list-style-type: none"> - All public areas must include a minimum of 50% wildflower planting - Compost bins for all dwellings - Level access for less mobile for all buildings - Bee brick, swift, owl and bat boxes - Street lights to be motion active - Nothing on illumination, adverts - Tree lined streets (I know this one is in the NPPF now) 		
	Babergh District Council	<ul style="list-style-type: none"> • Amend cross reference in first para to read 'Appendix 3'. • In criterion b., we have previously seen NP Examiners call for the word 'important' to be removed from before 'open, green, and landscaped areas' because, in their opinion, these areas have not been defined. You should consider whether the same applies here and, if it does, take appropriate action. 	<p>Agree</p> <p>Agree. The policy will be amended.</p>	<p>Amend second sentence of Policy SPTN16 as follows: Planning applications should, as appropriate to the proposal, demonstrate how they satisfy the requirements of the Development Design Checklist in Appendix 2 <u>3</u> of this Plan.</p> <p>Amend criterion b. as follows: b. do not involve the loss of gardens, important open, green, or landscaped areas, which make a significant contribution to the character and appearance of that part of the village;</p>
	Boyer on behalf of Taylor Wimpey UK Ltd	2.59 We do not object to the criteria in Policy SPTN 16, which appear to align with the principles set out within the NPPF.	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
	Ipswich Borough Council	<p>Policy SPTN 16 requires development to reflect local characteristic in the Neighbourhood Plan area. It is noted that criteria h requires one electric vehicle charging point per new off-street parking space. Ipswich Borough Council supports efforts to encourage electric vehicle charging points in new developments to help address air quality concerns in the Borough. It is recommended though that Sproughton Parish Council engage with Suffolk County Council to ensure that this requirement is justified and feasible. This is because the requirement is beyond the standards set out in the Suffolk Guidance for Parking (2019) and it needs to be demonstrated that this can be achieved in new developments.</p> <p>Paragraph 6.17 (Housing Space Standards) of the Plan states that "Three storey homes are not permitted under the Neighbourhood Plan Design Code. Any development permitted shall be restricted to up to two storeys in height." The Borough considers that such a design requirement is unduly restrictive and the Parish Council may want to review this particular design requirement.</p> <p>The Design Guidance and Codes document appears to include design policies, rather than guidance. The document is very prescriptive and could be said to prohibit creativity and distinctiveness. The Parish Council may wish to review the wording and formatting of this document to avoid any confusion over its status accordingly. It is also unclear how this guidance sits within the context of the emerging draft Babergh and Mid Suffolk Joint Local Plan and any design guidance therein.</p>	<p>This requirement has already been successfully incorporated into made neighbourhood plans across Suffolk.</p> <p>Noted. The guidance is considered appropriate.</p> <p>The Design Guidance does not contain policies.</p>	None
	Suffolk County Council	<p>The plan does indicate the concerns of unsafe parking in the parish. Therefore it is recommended that the neighbourhood plan should include a proportion of on-street parking to be included within new housing developments. On-street parking will always be inevitable from visitors and deliveries or</p>	<p>Disagree. On-street parking could have a significant detrimental impact on the character of the area as well as the ability to</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>maintenance. Having provisions that are well-designed and integrated into the development will help to ensure safety of pedestrians and road users, and help to minimise disruptions to access, including for emergency service and refuse collections vehicles. Please see pages 25-28 of Suffolk Guidance for Parking 2019 for further guidance.</p> <p>The following amendments are recommended for Policy SPTN16:</p> <p>“ f. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that road layouts do not dominate the area, that all appropriate vehicle parking is provided within the development plot where a proportion of parking is provided on street within a new development, but is well designed, located and integrated into the scheme to avoid obstruction to all highway users or impede visibility, and seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement whilst prioritising the movement of pedestrians and cyclists;”</p> <p>h. where appropriate, make adequate provision for the covered storage of all wheelie bins and for secure cycle storage, including cycle charging points, in accordance with adopted cycle parking standards;”</p> <p>SCC requests that reference should be made to Suffolk Guidance for Parking (2019)⁶ with regard to parking, cycle storage, and electric vehicle charging.</p>	<p>service a development and highway safety.</p> <p>Disagree</p> <p>The Policy will be amended</p> <p>The Plan seeks to exceed the electric vehicle charging standards for residential development.</p>	
Policy SPTN 17 – Flooding and Sustainable Drainage				
P Wood	-	I think this is a crucial issue with global warming	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
J Tuppen Davies	-	Consideration needs to be given to developments upstream exacerbating flooding downstream in Sproughton.	The Neighbourhood Plan cannot control developments outside the parish.	None
C Fuller	-	Development should avoid building in the Gipping Valley floodplain. Needs to be set within the context of the comments within this consultation response	Noted	None
J Pateman- Gee		SuDs are a requirement for development of 10 dwellings or more and SCC Floods team will not look at anything under 10 units. However this policy is vague on when and what development types this policy applies to. All new development could mean a conservatory or a new warehouse. As the SCC flood team already deal with this area, the policy is vague and has lots of words like "should"it will be ignored. Also it sort of repeats point g of the design policy 16.		
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>2.60 We do not support Policy SPTN 17. Firstly, the need for Drainage Strategies and Flood Risk Assessments to support proposals, as well as the requirement to use SuDS are addressed through National and Local Policies. This Policy, as currently worded, is unnecessary as it repeats existing requirements.</p> <p>2.61 The Policy also states that all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site drainage and water resources will be managed. The Policy, however, fails to confirm what level of detail is appropriate for what scale of development and does not define the term "water resources". Further clarification is required.</p> <p>2.62 Whilst it is not disputed that multifunctional drainage systems have clear benefits, it is not considered that "wetland" is the appropriate term in reference to drainage strategies.</p>	<p>Disagree</p> <p>The policy will be amended</p> <p>Disagree</p> <p>Noted</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>2.63 In response to "rainwater and stormwater harvesting and recycling", it should be acknowledged that only large scale harvesting would usually provide an open basin.</p> <p>2.64 Drainage schemes and strategies are entirely man-made, the Pre-submission SNP's choice of phrase "natural drainage systems" is also not considered appropriate in the context of this Policy.</p>	Noted	
	Suffolk County Council	<p><u>Flooding</u> Firstly, there have been changes to the NPPF regarding flood risk and development. We have within Babergh and Mid Suffolk districts a number of allocated sites being re-evaluated due to the changes.</p> <p><i>Policy SPTN17 - Flooding and Sustainable Drainage</i> The following amendments are proposed to the first part of this policy: "Proposals for all new development will be required to submit schemes appropriate to the scale of the proposal assess levels of flood risk (existing and future) and ensure they manage surface water from the proposal development, detailing how on-site drainage and water resources will be managed so as not to cause or exacerbate flooding elsewhere."</p> <p>The following amendments are proposed in order to strengthen paragraph 10.9: "All new development will be required where appropriate, to make provision for the management of surface water run-off in order not to exacerbate the situation increase the risk of flooding. The preferred method for this area is infiltration which reduces the flood threats from river floods and best matches the historical absorption of surface water by woodland and agriculture. Whilst infiltration is preferable, this is subject to the site geology, and alternative methods to drain the development shall be in line with national drainage</p>	Amend the Policy	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<i>hierarchy</i> . The attenuation and recycling of surface water and rainwater will be required through the incorporation of Sustainable Drainage Systems (SDS SuDS) that might include on-site rainwater and stormwater harvesting, greywater recycling and the management of run-off and water management in order to reduce the potential for making the situation worse."		
	Ipswich Borough Council	Policy SPTN17 requires proposals to include use of above-ground open Sustainable Drainage Systems (SuDS) "as appropriate". This is a loose phrase which doesn't offer any certainty as to the circumstances where it is or is not appropriate to meet the policy requirement. The Parish Council may wish to be more precise in their wording of this policy to avoid ambiguity. Reference should be made to the Suffolk County Council SuDS guidance and any guidance produced by Babergh and Mid Suffolk Councils in terms of Supplementary Planning Guidance and emerging Local Plan policy.		
Chapter 10 Development Design - General Comments				
V Durrant	If applicable	This is a highly important chapter and the Development Design Checklist should be robustly implemented.	Noted	None
B Hunt	-	Sproughton appears to have numerous under ground water runs and should be taken seriously to prevent flooding problems	Noted	None
P Powell	-	Note 10.9 seems to make distinction that infiltration is the preferred method for this area, But that Attenuation and recycling is SUDs. Both infiltration and attenuation are SUDs drainage systems, but Infiltration is the preferred method for this area.	The Policy will be amended to reflect the comments of the County Council	
S Catermole	-	In particular 10.6 in terms of height of rooflines. Wolsey Grange seems to have taller properties than originally agreed, unless i am mistaken.	Noted	None
C Fuller	-	Needs to be set within the context of the comments within this consultation response	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No opinion	Noted	None
	Boyer on behalf of Taylor Wimpey UK Ltd	2.65 We are concerned by Paragraph 10.9, which identifies infiltration as being the preferred method of drainage as it "reduces the flood threats from river floods and best matches the historical absorption of surface water woodland and agriculture". We suggest this phrase is removed from the SNP	The Policy will be amended to reflect the comments of the County Council	
Policy SPTN 18 – Protecting Existing Services and Facilities				
C Fuller	-	Needs to be set within the context of the comments within this consultation response	Noted	None
J Pateman-Gee		Good, but only a and b or a and c need to be complied with to be satisfied. I will say b is going to be hard and may not be seen as reasonable.	Noted	None
	Boyer on behalf of Taylor Wimpey UK Ltd	2.66 We have no comment to make in response to Policy SPTN 18 and note the Parish's commitment to undertaking play area improvements.	Noted	None
	Ipswich Borough Council	Policy SPTN 18 seeks to safeguard " <i>valued facilities or services</i> " which support the local community, however the policy fails to define what is meant by the term " <i>valued facilities or services</i> ". The Parish Council should consider identifying which facilities and services it aims to safeguard through this policy to prevent their unintended loss. Clause c states that the loss of existing community facilities and services will be supported where " <i>alternative facilities and services are available, or replacement provision is made, of at least equivalent standard, in a location that is accessible to the community it serves with good access by public transport or by cycling or walking.</i> " In order to support sustainable travel choices, the Parish Council may wish to consider requiring alternative facilities to be accessible via public transport, cycling and walk, as opposed to one or other of these sustainable travel modes.	This is not considered necessary	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
	Suffolk County Council	We fully support any measures to encourage sustainable travel.	Noted	None
	Babergh District Council	Our only comment relates to criterion a. Policy LP31 in the emerging JLP refers to a sustained 6-month marketing period. We suggest amending the NP to follow suite.	Agree. Amend requirement to 6 months marketing	
Community Action 2 – Playing Field Improvements				
C Fuller	-	Improvement should be within the existing location	Noted	None
	Boyer on behalf of Taylor Wimpey UK Ltd	2.66 We have no comment to make in response to Policy SPTN 18 and note the Parish's commitment to undertaking play area improvements.	Noted	None
Policy SPTN 19 – Open Space, Sport and Recreation Facilities				
V Durrant	If applicable	I would suggest the specific mention of the 'Island Site' here. This is owned by IBC who have indicated that this will become a protected 'Nature Reserve'. To include this as a specific site would protect this major wildlife site and important element of the 'wildlife corridors'. Not specifically detailing this site and its protection from development in the NP, could lead to its absorption within the 'British Sugar' development, and its subsequent disappearance over time.	Need to think about this	
J Webb	-	Must include sufficient car parking Church Hall.	Noted	None
C Fuller	-	Needs to be set in the context of the comments in this consultation response	Noted	None
J Pateman-Gee		This sort of two policies. The first is protection of existing provisions and that reads fine. The second is to gain new provision of open space and sport out of new development. You state "where necessary", but don't say what your criteria is for when it is necessary. Meaning planners will not know when to apply making this policy useless.	Noted This will be through the use of open spaces standards in the adopted development plan. Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>Babergh has no criteria on open space and sport provision at the moment, so this is a chance to write one. I would suggest splitting this into two policies.</p> <p>The rest of this policy is sort of design elements to consider, but that could be picked up under the design policy anyway if that was developed a little further and so this can slimmed down.</p> <p>PS - Floodlights are important to address and perhaps operation times as well.</p>	This is not considered necessary.	
	Boyer on behalf of Taylor Wimpey UK Ltd	2.67 We support both Policy SPTN 19 and SPTN 20, which appear to align with NPPF (2021) and the Draft JLP in terms of needing to provide open space on new developments.	Noted	None
	Ipswich Borough Council	<p>Policy SPTN 19 states that "Proposals for the provision, enhancement and/or expansion of amenity, sport or recreation open space or facilities will be permitted subject to compliance with other Policies in the Development Plan. Development which will result in the loss of existing amenity, sport or recreation open space or facilities will not be allowed unless...". The use of the phrases 'will be permitted' and 'will be allowed' carry too much weight and imply pre-determination. The phrases could be replaced with the terms 'supported' or 'encouraged' to convey a positive approach.</p> <p>Policy SPTN 19 continues "Where necessary to the acceptability of the development, the local planning authority will require developers of new housing, office, retail and other commercial and mixed development to provide open space including play areas, formal sport/recreation areas, amenity areas and where appropriate, indoor sports facilities or to provide land and a financial contribution towards the cost and maintenance of existing or new facilities, as appropriate." It is unusual for development other than residential to provide public open space and other forms of open space other than boundary treatment and setting which is required to contribute to 10%</p>	<p>Disagree that such words should not be used.</p> <p>Noted</p>	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>increase in biodiversity. It is suggested that this is amended to reflect this.</p> <p>Finally, the Policy states that "Proposals which give rise to intrusive floodlighting will not be permitted'. It would helpful to define what is considered to be "intrusive floodlight" to enable the Policy to be applied correctly and consistently. In addition to having an impact on residential amenity, flood lighting can have a detrimental impact on local wildlife habitats. Schemes involving floodlighting and developments in sensitive areas, such as adjacent to sites of nature conservation importance, should employ a specialist lighting engineer accredited by the Institute of Lighting Engineers to ensure that artificial lighting causes minimal disturbance to occupiers and wildlife.</p>	<p>This would be determined through the consideration of a planning application.</p>	
	Suffolk County Council	<p>SCC would suggest the inclusion of the need to make green spaces and facilities accessible to residents with limited mobility (inclusion of benches and well-maintained paths etc), into Policy SPTN19. This could help to make an elderly population feel more included as part of the community and reduce isolation of vulnerable groups.</p> <p>This policy could include public cycle parking to encourage active travel. Reference could be made to Suffolk Guidance for Parking (2019) regarding parking.</p>	<p>These matters of detail are not considered necessary for inclusion in the policy.</p> <p>Any development will need to conform with adopted standards and therefore it's not appropriate to refer to it specifically in this policy.</p>	None
	Babergh District Council	<p>A minor amendment to ensure consistency with other recently examined NPs. Insert the words 'current and future' before 'needs of users' in criterion b.</p>	<p>The policy will be amended</p>	<p>Amend criterion b. of Policy SPTN19 as follows: b. replacement for the space or facilities lost is made available, of at least equivalent quantity and quality, and in a suitable location to meet the <u>current and future</u> needs of users of the existing space or facility</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
Policy SPTN 20 – Utilities and infrastructure				
P Wood	-	More consideration in this area is required	Noted	None
C Fuller	-	Needs text adjustment (c) proposals have been sited & designed to minimise the impacts on the rural character & environmental quality of Sproughton Needs to be set in the context of the comments in this consultation response	Noted	None
J Pateman-Gee		Pointless policy from a planning position as thanks to permitted development the vast majority of this type of development doesn't need permission. Even when it might need permission, criteria are very narrow to judge and often on a prior approval basis with default of deemed consent in a short timeframe. .	Noted	None
	Boyer on behalf of Taylor Wimpey UK Ltd	2.67 We support both Policy SPTN 19 and SPTN 20, which appear to align with NPPF (2021) and the Draft JLP in terms of needing to provide open space on new developments.	Noted	None
	Ipswich Borough Council	Policy SPTN 20 aims to ensure that such infrastructure is sensitively sited and designed. A number of forms of electronic communications development are permitted under the provisions of the GPDO and as such the policy may not be enforceable. Furthermore, the Policy states that "Where possible, new overhead power and telephone cables/masts should be placed underground. Alternatively, they must be camouflaged to blend in with the environment". The term 'where possible' is a loose phrase which doesn't offer any certainty as to the circumstances where it is or is not possible to meet the policy requirement. The Parish Council may wish to be more precise in their wording of this policy to avoid ambiguity.	Noted Noted	None
	Babergh District Council	The last paragraph requires some re-writing to avoid confusion. We suggest: "Where possible, new power and telephone cables should be placed underground. If this is not possible, masts must be camouflaged to blend in with their environment."	Agree to amendment	Amend final paragraph of Policy SPTN20 as follows: Where possible, new overhead power and telephone cables/ masts should be placed underground. <u>Alternatively,</u>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
				they If this is not possible, <u>masts</u> must be camouflaged to blend in with the environment.
Chapter 11 Infrastructure, Services and Facilities - General Comments				
J Tuppen	-	More consideration needs to be given to cumulative traffic impact of the developments in Sproughton and surrounding parishes.	Noted	None
C Fuller	-	Needs to be set in the context of the comments in this consultation response	Noted	None
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No opinion	Noted	None
	Boyer on behalf of Taylor Wimpey UK Ltd	2.68 We support the content of Chapter 11 and have no further comments to make.	Noted	None
Policy SPTN 21 – Public Rights of Way				
H Mitchell	-	More attention needs to be taken to ensure the rights of way are kept clear	Noted	None
C Fuller	-	Needs to be set in the context of the comments in this consultation response	Noted	None
J Pateman-Gee		So this is a public right of way and bridle path policy. Sounds great and I don't think anyone would say support of footways is not a good idea. However, I think you have missed a trick. Why not get new development sites can only be supported if they ensure connection and improvement to existing footways to be sustainable. New development should contribute to existing footways to mitigate the burden of new people using them.	This would probably fail Para 122 of the CIL regulations.	None
Dr Hoque	National Highways (former, Highways England)	<ul style="list-style-type: none"> Highways and Movement Policy - SPTN 21 Public Rights of Way On highways and movement, there are few existing problems/issues which have been identified in paragraph between 12.1 to 12.6. From National Highways, there are	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>already few identified schemes on A14 and A12 to improve major highway infrastructures and associated junction improvement schemes although they are within the RIS programme they are still subject to statutory procedures and the availability of funding and cannot necessarily be guaranteed to come forward.</p> <p>Any transport assessment will need to be undertaken in accordance with the requirements of DfT Circular 02/2013: And National Highways protocol "The Strategic Road Network and the Delivery of Sustainable Development."</p>		
S Lavington	-	<p>12.9: walking (page 59). Community Action 3: public rights of way.</p> <p>Two items should be added to the list of required new paths:</p> <p>(a). Formalising the customary footpath through Monks Wood between High Street and the playing field and Primary School. There is a need to obtain a permanent public right of way between Monks Close and the playing field, using a path through the wood that has been in regular use by Sproughton residents for many years – and to my knowledge certainly since 1986. The community benefit of this is self-evident, since it provides a convenient, safe and direct footway between the dwellings on High Street and the village sports facilities and the primary school. The alternative route via Lower Street and Church Lane is much longer and passes alongside traffic-filled highways giving off excessive polluting fumes, using footways (pavements) that are in some places dangerously narrow – for example in the vicinity of number 9 High Street – where accidents to pedestrian have happened in the past.</p> <p>(b). A new footpath and cycle path is needed southwards along the headland to the eastern side of the B1113, connecting the Sproughton built area with the Beagle roundabout and hence with the A1071. This path would allow pedestrians and cyclists to avoid the dangers of the faster and twistier sections of the B1113 with blind bends. This is especially important for children attending the One Suffolk sixth form college and those residents who at present walk to work daily along the B1113.</p>	ONE FOR YOU TO DECIDE	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>Note that Sproughton Parish Council's Transport Panel carried out a study of the route of this path, including Land Registry data, some years ago when actively pursuing a plan to obtain a grant to implement this footpath. The application was not successful.</p>		
	<p>Boyer on behalf of Taylor Wimpey UK Ltd</p>	<p>2.73 We support the principle of Policy SPTN 21 in that measures to improve and extend existing network of public rights of way should be supported.</p> <p>2.74 We do not agree with the inclusion of criterion ii) which states that improved or extended rights of way should lead to development of new bridleways to support the local equestrian community. We support the local equestrian community but it needs to be recognised that it may not always be possible for rights of way to lead to bridleways as a result of constraints outside of an applicant's control, including location.</p> <p>2.75 Notwithstanding this, Policy SPTN 21 also fails to acknowledge that Suffolk County Council have responsibility for the PROW network, yet recognition of this is not referenced in the Pre-submission SNP.</p> <p>2.76 We suggest that criterion ii) is reworded to state, "where possible, and in conjunction with Suffolk County Council, they lead to development of new bridleways to support the local equestrian community with the local and neighbouring parishes".</p>	<p>Noted</p> <p>The policy does not state that proposals "should" lead to new bridleways.</p> <p>This is not appropriate.</p> <p>Disagree</p>	<p>None</p>
	<p>Ipswich Borough Council</p>	<p>Ipswich Borough Council supports Policy SPTN 21 which aims to improve and extend the existing network of public rights of way. Part of the Outline Consent for the development of the Sproughton Enterprise Park includes agreement to upgrade and widen 1.4km of public footpath to an all weather surface. There is also reference to enhancement of the cycleway by the river in the Neighbourhood plan. This is not designated cycleway but is in fact a public right of way footpath.</p>	<p>Noted. The reference to a cycle path is made in the planning consent for the Enterprise Park.</p>	<p>None</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>The Borough Council is seeking to establish and extend its own publicly accessible green trail around the edge of the Borough as illustrated on Plan 6 of the emerging Ipswich Local Plan, in order to address the need within the Borough for access to Natural and Semi Natural Greenspace. The green trail will provide an ecological corridor (this links to paragraph 8.23 of 'Biodiversity' in the draft neighbourhood plan and the need to accommodate wildlife corridors and a recreational resource for people to use. Development at the edge of the built-up area will be required to provide links within the green trail as part of on-site open space provision.</p> <p>Ipswich Borough Council is keen to work with neighbouring local authorities and parish councils to address cross boundary green infrastructure provision and identify sites or routes later in the plan period.</p>	<p>Noted</p> <p>Noted</p>	
	Suffolk County Council	<p>Policy SPTN 21 Public Rights of Way and Community Action 3 Public Rights of Way are both very welcome.</p> <p>However, whilst point iii regarding biodiversity benefits is generally supported, it should be caveated with not allowing planting schemes to adversely affect the use of the public right of way. It should be noted that close planting or overhanging vegetation can impinge on the use for a path where such planting prevents sunlight drying out paths after bad weather.</p>	This amendment is not considered necessary	None
Community Action 3 – Public rights of way				
V Durrant	If applicable	Presumably this should be action 3.	It is acknowledged that the comments form referred to Community Action No 2 but that the title was correct	None
P Powell	-	This should be CA 3	It is acknowledged that the comments form referred to Community Action No 2 but that the title was correct	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
C Fuller	-	Needs to be set in the context of the comments in this consultation response	Noted	None
D Taylor	-	but would add to point 2 enabling road avoidance as much as is practicable	Public rights of way generally avoid roads	None
C Taylor	-	Do you mean Community Action 3?	It is acknowledged that the comments form referred to Community Action No 2 but that the title was correct	None
S Lavington	-	<p>12.9: walking (page 59). Community Action 3: public rights of way.</p> <p>Two items should be added to the list of required new paths:</p> <p>(a). Formalising the customary footpath through Monks Wood between High Street and the playing field and Primary School. There is a need to obtain a permanent public right of way between Monks Close and the playing field, using a path through the wood that has been in regular use by Sproughton residents for many years – and to my knowledge certainly since 1986. The community benefit of this is self-evident, since it provides a convenient, safe and direct footway between the dwellings on High Street and the village sports facilities and the primary school. The alternative route via Lower Street and Church Lane is much longer and passes alongside traffic-filled highways giving off excessive polluting fumes, using footways (pavements) that are in some places dangerously narrow – for example in the vicinity of number 9 High Street – where accidents to pedestrian have happened in the past.</p> <p>(b). A new footpath and cycle path is needed southwards along the headland to the eastern side of the B1113, connecting the Sproughton built area with the Beagle roundabout and hence with the A1071. This path would allow pedestrians and cyclists to avoid the dangers of the faster and twistier sections of the B1113 with blind bends. This is especially important for children attending the One Suffolk sixth form college and those residents who at present walk to work daily along the B1113. Note that Sproughton Parish Council’s Transport Panel carried out a study of the route of this path, including Land Registry</p>	ONE FOR YOU TO DECIDE	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		data, some years ago when actively pursuing a plan to obtain a grant to implement this footpath. The application was not successful.		
	Boyer on behalf of Taylor Wimpey UK Ltd	Community Action 2 is noted	Noted	None
	Suffolk County Council	<p>Policy SPTN 21 Public Rights of Way and Community Action 3 Public Rights of Way are both very welcome.</p> <p>However, whilst point iii regarding biodiversity benefits is generally supported, it should be caveated with not allowing planting schemes to adversely affect the use of the public right of way. It should be noted that close planting or overhanging vegetation can impinge on the use for a path where such planting prevents sunlight drying out paths after bad weather.</p>		
Chapter 12 Highways and Movement - General Comments				
V Durrant	If applicable	In para 12.5, continued pressure needs to be put on Highways England to improve or modify the 'Off Network Diversion Route' using the B1113, through the village. I would suggest that para 12.1 also highlights the lack of a safe footway from the village centre to link up with the footway at the 'Beagle'. One way of reducing vehicle speeds through the village is the installation of one or more pedestrian/ pelican crossings in the High Street.	Noted	None
P Wood	-	This is crucial as the Parish has suffered terribly from highways decisions	Noted	None
C Fuller	-	<p>Needs to be set in the context of the comments in this consultation response</p> <p>12.9 - The text underplays the reality of the current & long-running traffic problems on High street that have been well-defined over many years (eg Parish Plan etc) and consistently ignored by Highways authorities, local planning authorities, developers and other regulators/enforcers. The road and pavement design is not fit for current traffic volume & A14 HGV</p>	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		usage, accounting for necessary residential parking, pedestrian requirements and characterful residential properties. There is a clear and well-documented conflict between necessary pavement usage by pedestrian/residents (includes vulnerable residents & front door directly opens onto pavement) and commuting vehicles driving along the pavement. Records will also show the excessive number of road works in high street (eg, water pipes etc) which are at least in part due to the excessive weight & associated vibrations of vehicles (including A14 diverted HGV's) and pavement driving impacting on insufficiently protected sub-surface infrastructure.		
D Taylor	-	12.9 First bullet point- also an extension to the footpath along High Street from Rivers Court to the Beagle second bullet point- also a crossing where the footpath changes sides further to the south on the B1113	Noted	None
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No opinion	Noted	None
S Lavington	-	12.9: walking (page 59). Community Action 3: public rights of way. Two items should be added to the list of required new paths: (a). Formalising the customary footpath through Monks Wood between High Street and the playing field and Primary School. There is a need to obtain a permanent public right of way between Monks Close and the playing field, using a path through the wood that has been in regular use by Sproughton residents for many years – and to my knowledge certainly since 1986. The community benefit of this is self-evident, since it provides a convenient, safe and direct footway between the dwellings on High Street and the village sports facilities and the primary school. The alternative route via Lower Street and Church Lane is much longer and passes alongside traffic-filled highways giving off excessive polluting fumes, using footways (pavements) that are in some places dangerously narrow – for	ONE FOR YOU TO DECIDE	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>example in the vicinity of number 9 High Street – where accidents to pedestrian have happened in the past.</p> <p>(b). A new footpath and cycle path is needed southwards along the headland to the eastern side of the B1113, connecting the Sproughton built area with the Beagle roundabout and hence with the A1071. This path would allow pedestrians and cyclists to avoid the dangers of the faster and twistier sections of the B1113 with blind bends. This is especially important for children attending the One Suffolk sixth form college and those residents who at present walk to work daily along the B1113. Note that Sproughton Parish Council's Transport Panel carried out a study of the route of this path, including Land Registry data, some years ago when actively pursuing a plan to obtain a grant to implement this footpath. The application was not successful.</p>		
S Catermole	-	Broadly agree. High Street and Lower Street have significant issues regarding pedestrian safety. I would additionally must reference the footpath provision along Hadleigh Road which i do consider to be dangerous considering the type of commercial traffic that uses the and speeds along it.	Noted	None
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>2.69 Overall, we appreciate and endorse Objectives 20 – 24 set out in this Chapter. Whilst this is not a direct comparison with the planning application that has been submitted (DC/21/02671), nor LA013 draft allocation within the Draft JLP, there is a clear correlation and we can with certainty say that the allocation and application (DC/21/02671) will achieve these objectives.</p> <p>2.70 The mitigation proposed as part of both the Wolsey Grange 1 development which has been modified and that proposed as part of development at Land North of the A1071 (DC/21/02671) will promote measures to improve pedestrian and cycle access, alongside safety.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>2.71 This includes: making segregated provision through the development to allow linkage between the A14 underpass and Church Road to the 6th form college at Suffolk One; improving existing provision alongside the A1071 to access the Beagle Public House; provide improvement to the Beagle Roundabout with traffic signal control that will remove existing congestion; and provide facilities within Hadleigh Road or the development to improve access to Chantry Park.</p> <p>2.72 Many of these measures are included within the relevant Policies of the Draft JLP. They will complement the focus on Public Rights of Way which as set out below the proposed development at Land North of the A1071 is maintaining in their own right.</p> <p>2.78 As explained above, the Parish's aspirations for highways and transport improvements are noted and appreciated. It is also acknowledged that the Parish are seeking improved cycle ways and infrastructure and a safe crossing point or points on Hadleigh Road to provide links between Collinsons and Elton Park and Chantry Park. We do not object to Chapter 12 Highways and Movement.</p>	<p>Noted</p> <p>Noted</p>	
	Suffolk County Council	<p>We welcome the reference to the physical and mental health and wellbeing benefits that can be gained from access to pleasant outdoor areas, in paragraph 12.11</p> <p>Active Travel Active travel, such as walking and cycling, is important in order to improve physical health and reduce obesity levels, as well as can help to minimise levels of air pollution from motorised vehicles.</p> <p>SCC welcomes the desire for safe walking and cycling routes highlighted throughout the plan and particularly in Chapter 12. Safe routes for walking and cycling are important to ensure the</p>	<p>Noted</p> <p>Noted</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>safety of residents of all ages, especially those that are very young or very old, and have mobility issues or are frail.</p> <p>Public Rights of Way There could be reference to other strategies that support this Neighbourhood Plan. This includes Suffolk County Council's Green Access Strategy (2020-2030)⁵. This strategy sets out the council's commitment to enhance public rights of way, including new linkages and upgrading routes where there is a need. The strategy also seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working. There is a typo under 12.10 where reference to Map 11 should be to Map 12.</p> <p>SCC recommends that Chapter 12 should include a new highways and sustainable transport policy. Transport Modelling undertaken for the Ipswich, Babergh and Mid Suffolk and Suffolk Coastal Local plans, highlight potential severe impacts on the road network in and around Ipswich as a result of the cumulative growth in the local plans. The identified solution to address this impact while meeting the housing need set out in local plans is mode shift from private cars to other modes of transport, of both the new and existing population. Mode shift is key, but not travelling at all (home working and parcel consolidation etc.) trip internalisation (work, education and residential co-located) and trip shift (travelling outside the peak hours for discretionary trips and more flexible employment options) are all part of the overall demand reduction picture. SCC produced the Transport Mitigation Strategy for the Ipswich Strategic Planning Area⁷ to outline how this mode shift can be achieved and further work is being undertaken to identify a program of works to deliver the strategy.</p>	<p>This is not considered necessary</p> <p>Para 12.10 will be amended.</p> <p>Noted</p>	<p>Amend map reference in Para 12.10</p> <p>None</p> <p>None</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>Sproughton Neighbourhood Plan can contribute to the delivery of this strategy. Being an Ipswich Fringe location, it has some of the highest potential for mode shift than many other places within the Ipswich Strategic Planning Area, with the exception of Ipswich itself. The Neighbourhood Plan should support the delivery of the strategy through policy. Supporting the strategy would also help to achieve the Transport Objectives within the neighbourhood plan.</p> <p>Within this new policy, there should be the explicit support for the Ipswich Strategic Plan Area (ISPA) Transport Mitigation Strategy, which covers Babergh and Mid Suffolk Districts, Ipswich Borough, and part of East Suffolk Council (former Suffolk Coastal Area).</p> <p>This new policy should support sustainable transport measures set out in the Babergh and Mid Suffolk Infrastructure Delivery Plan (IDP), the emerging programme of works to deliver the Transport Mitigation Strategy and walking and cycling infrastructure plans.</p> <p>The IDP indicates the following mitigation schemes will be required for Sproughton: Mitigation measures identified under current applications in this area would be required: - Footways improvements in Sproughton - Zebra crossing in Sproughton - Junction improvements A1071 - Improved pedestrian links between Sproughton and Bramford. - Land to the west of Hadleigh Road (LA013) – Cycle links and pedestrian links will be required.</p> <p>The following wording is proposed for a new policy regarding sustainable transport:</p> <p><i>“Policy SPTN 22 – Highways and Sustainable Transport. Development proposals should seek to maximise sustainable modes of transport as a priority, ensuring that the site is connected to existing services and facilities, and is accessible via</i></p>	<p>This is not considered necessary at such a local level especially as most works identified are within the highway and would not require planning consent.</p> <p>It is considered that the content of this policy is already sufficiently addressed in the Joint Local Plan</p>	<p>None</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p><i>active travel such as walking and cycling, can access public transport</i></p> <p><i>Proposals must demonstrate contribution to the achievement of transport mode shift in the Transport Mitigation Strategy for the Ipswich Strategic Planning Area. Financial contributions or works in kind will be sought from development to assist with delivery of the Transport Mitigation Strategy for the Ipswich Strategic Planning Area, sustainable transport measures identified in the most up to date Infrastructure Delivery Plan and the most up to date walking and cycling infrastructure plans.</i></p> <p><i>Development should include</i></p> <ul style="list-style-type: none"> <i>• Safe, connected, and inclusive walking and cycle routes</i> <i>• Linkages to existing pedestrian and cycle networks and improvements to those routes if necessary</i> <i>• Public transport, such as new or revised services, and physical measures such as bus stops, improvements</i> <i>• Incentives to use sustainable modes of transport and encourage behaviour change, including through Travel Plans."</i> 	and elsewhere in the Neighbourhood Plan.	
	Babergh District Council	Para 12.10 Should refer to Map 12	Para 12.10 will be amended.	Amend Para 12.10 to refer to Map 12.
Parish Wide Policies Map Comments				
H Davies	-	Inclusion of the important view from the hill north of Sroughton Road adjacent to the A14 junction close to Sroughton Manor	This view is not from a public area and it is therefore not appropriate to include it.	None
P Powell	-	The Parish Wide Policies Map includes all sites allocated in the JLP. However if an allocated site is rejected or reduced in the JLP examination process it will no longer need to be built on, but if it has been assigned in the SNP Policies Maps as	As a result of the outcome of the Joint Local Plan examination the settlement Boundaries will be amended to reflect those in the	Amend policies maps to reflect the outcome of the Joint Local Plan examination.

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>settlement Boundaries it will invite further attempts to develop as it will conform to policies for land within the settlement boundary.</p> <p>LA116 is particularly relevant. Even if the JLP examination upholds the rejected appeal the SNP will have designated this as land within the settlement boundary and the community could be fighting of unacceptable planning applications (within the settlement boundary) on this site until a new SNP can be created to remove or amend it.</p> <p>Map should designate all settlement boundaries as 'subject to confirmation of settlement boundary in the emerging JLP'</p>	adopted Babergh Local Plan while taking account of subsequent development and unbuilt planning consents.	
C Fuller	-	Needs to be set in the context of the comments in this consultation response	Noted	None
S Catermole	-	Cannot as i do not have a Hadleigh road inset included in the version i have.	Noted	None
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>2.79 As set out in our response to previous questions, we do not support the Parish Wide Policies Map for the following reasons:</p> <ul style="list-style-type: none"> • It excludes parts of allocation LA013 and therefore is contrary to Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011); • It designates large swathes of allocation LA013 as valued landscape which should be protected from development and therefore seeks to prevent the delivery of allocation LA013, therefore failing to meet Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011); • It proposes settlement gaps along Hadleigh Road which does not appear to be supported by appropriate evidence. 	<p>Policy LA013 is to be deleted from the JLP</p> <p>The designation is supported by robust and professional assessment.</p> <p>The designation is supported by robust and professional assessment.</p>	None
	Ipswich Borough Council	It would be helpful if the resolution of the Policies Map could be sharper/ clearer to allow for sites to be examined in greater detail. Perhaps a separate document could be used instead to help with this.	This will be addressed.	Identify the non-designated heritage assets on the Policies Map.

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>Additionally, including designated and non-designated heritage assets on the map would be helpful to users of the document. It is also recommended that the Ipswich Green Trail is included on the Policy Map (see the Ipswich Local Plan Review Policies Map).</p> <p>Finally, the key is missing from the Village Centre Inset Map.</p>	The Non-Designated Heritage Assets will be identified but it is not appropriate to identify designations that are outside the Plan Area.	
	Suffolk County Council	<p>The Parish Wide Policies Map on page 61 says "See Hadleigh Road Inset Map" but is labelled as "Ipswich Fringe Policies Map" on page 63.</p> <p>There are areas of a grey colour on the policies maps, that do not appear to be identified in the key.</p> <p>It would also be helpful for the policies map to display the housing sites allocated in the JLP, to provide clarity and ease of reading.</p>	<p>This will be addressed</p> <p>The JLP will no longer allocate sites at this stage and therefore the maps will be amended to reflect these changed circumstances.</p>	Amend policies maps to reflect the outcome of the Joint Local Plan examination.
Village Centre Policies Map Comments				
J Tuppen Davies	-	Should include Sproughton Manor and surrounding parkland as a special character area and note the view from the hill north of Sproughton Rd opp the Millenium Green adjacent to the A14 junction as per Alison Farmers Landscape Appraisal.	The extension of the special character area into the area suggested would water down the strength of the designation, primarily made to recognise that built heritage assets if the area.	None
P Powell	-	However this does not include LA116 in the settlement boundary even though it has not been rejected yet by the JLP examination. Either the SNP has to conform to emerging JLP or it doesn't.	As a result of the outcome of the Joint Local Plan examination the Settlement Boundaries will be amended to reflect those in the adopted Babergh Local Plan while taking account of subsequent development and unbuilt planning consents.	Amend the Settlement Boundaries to reflect the adopted Local Plan boundaries but to include recent developments and current planning consents.
C Fuller	-	Needs to be set in the context of the comments in this consultation response	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
G Armstrong	Armstrong Rigg Planning on behalf of Hopkins Homes	No. As set out under questions 3, 13 and 21, the decisions to exclude Land east of Lorraine Way (JLP Policy LA116) from the settlement boundary and to identify this site as both a Settlement Gap and part of a Special Character area render the draft Neighbourhood Plan contrary to the emerging Local Plan and to national policy and guidance. The draft Neighbourhood Plan therefore fails to meet the basic conditions.	Policy LA116 of the emerging Joint Local Plan now has no status as the District Council has agreed with the Local Plan Inspectors that it and all other new allocations should not be included in the current Joint Local Plan document. There is no requirement for the Neighbourhood Plan to allocate these sites.	None
	Boyer on behalf of Taylor Wimpey UK Ltd	2.80 We have no comment to make on the Village Centre Policies Map.	Noted	None
	Babergh District Council	On the Village Centre Inset Map on page 62, the colour combinations mean that the Local Green Space referred to as the 'Oak triangle by Manor Lodge' is not easily discernible.	This will be addressed	
Ipswich Fringe Policies Map Comments				
V Durrant	If applicable	See comments under question 35.	Noted	None
J Webb	-	Not if it impinges any further into Sproughton	Noted	None
P Powell	-	Following on from answer 36: If the SNP settlement boundaries don't have to conform to the JLP allocations. Then the WG2 application which hasn't yet been tested, and in particular those sections of WG2 that conflict with Heritage Impact Assessment guidance on similar levels as the grounds for the rejected appeal of LA116 (that land South of Church Lane and West of Hadleigh Road) should not be included in the SNP boundary for exactly the same reasons. That if it is included in the SNP Settlement Boundary it will be open to continued planning application attempts as a site within the settlement boundary until a new SNP can be drawn up, even if development of that part of the area is rejected by the JLP.	As a result of the outcome of the Joint Local Plan examination the settlement Boundaries will be amended to reflect those in the adopted Babergh Local Plan while taking account of subsequent development and unbuilt planning consents.	The Policies Maps will be amended to reflect the recent outcome of the examination of the Joint Local Plan
C Fuller	-	Needs to be set in the context of the comments in this consultation response	Noted	None

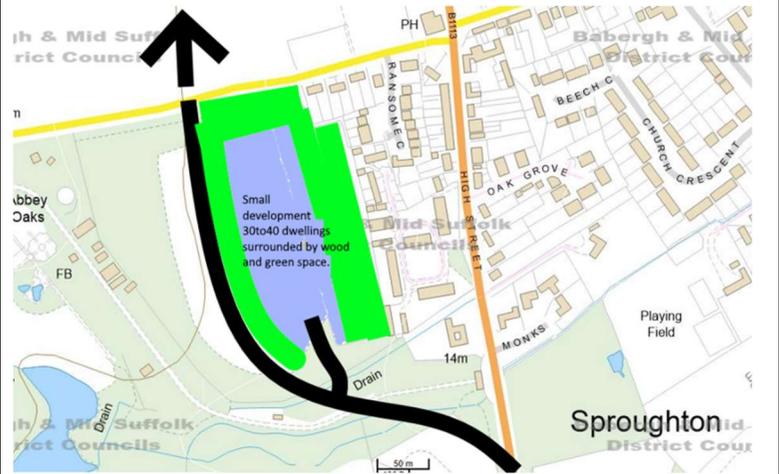
Name	Organisation	Comment	Parish Council Response	Proposed Changes
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>2.81 As set out within our response to question 35, we do not support the Parish Wide Policies Map for the following reasons:</p> <ul style="list-style-type: none"> • It excludes parts of allocation LA013 and therefore is contrary to Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011), as allocation LA013 contributes to the overall housing numbers within the Draft JLP; • It designates large swathes of allocation LA013 as valued landscape which should be protected from development and therefore seeks to prevent the delivery of allocation LA013, therefore failing to meet Basic Condition e) required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011); • It proposes settlement gaps along Hadleigh Road which does not appear to be supported by appropriate evidence. 	<p>Policy LA013 of the emerging Joint Local Plan now has no status as the District Council has agreed with the Local Plan Inspectors that it and all other new allocations should not be included in the current Joint Local Plan document. There is no requirement for the Neighbourhood Plan to allocate these sites.</p>	<p>The Policies Maps will be amended to reflect the recent outcome of the examination of the Joint Local Plan</p>
	Babergh District Council	<p>For the map on page 63, should the title read 'Hadleigh Road Inset Map'? {Nb: The Contents Page entry will also need correcting.}</p>	<p>The title and Contents page will be amended</p>	<p>Amend title of Inset Map on page 63 to Hadleigh Road Inset Map</p>
General Comments				
V Durrant	If applicable	<p>It is important that any agreed improvements under S106 Agreements for mitigating traffic flows, improving pedestrian safety or general infrastructure improvements are robust and that the responsible Authority enforces their implementation. We have been let down before with inter Authority disagreements on the SnOasis and associated Housing development. which has led to the current situation we have within the village where agreed traffic flow mitigations were not carried out.</p>	<p>Noted and thanks</p>	<p>None</p>
V Scott Gray	-	<p>We Need the pavement extended on the High Street in Sproughton up to the Hadleigh Road roundabout.</p>	<p>Noted and thanks</p>	<p>None</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		We need a convivial pub in the village 8		
P Wood	-	Excellent and applaud the hard work invested	Noted and thanks	None
H Davies	-	The policies need to be as strong as possible to ensure that the village remains a village.	Noted	None
H Wood	-	More attention needs to be paid to the traffic and speeding problems both in the village and on the Hadleigh Road. New developments will just exacerbate this very real problem	Noted and thanks	None
H Mitchell	-	The traffic situation particularly where I live on the Hadleigh Road is increasing. Speeding is making it more and more dangerous and flagrant breaches of the overnight weight limit with no policing of this is just making it a very busy and dangerous road and this will only get worse with the new Taylor Wimpoery developments	Noted and thanks	None
S Marquess	-	Well done to all involved!	Noted and thanks	None
V Scott Gray	-	Congratulations on a well-prepared and balanced plan.	Noted and thanks	None
J Webb	-	Just a marvellous piece of hard work on our behalf. For which the whole village should be grateful for. Sadly it just needs one politician to change an aspect of it and this document will stand for only some of it. Members of parliament should not have a say unless they actually visit and discuss with you all. House builders must be kept up to the rules and not allowed to do otherwise. Village will need a hedge and tree worker to maintain what is required.	Noted and thanks	None
R Hardacre	(Babergh District Council Councillor)	Good and comprehensive work!	Noted and thanks	None
P Powell	-	The team should be commended and supported in their efforts to produce such a complex and detailed piece of work. Resume of further points identified: SPTN 1,2 & 3 These may need looking at in light of changes made to the JLP by BMSDC and Examination Inspectors comments.	Noted and thanks	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>SPTN 12 & Chapter 8</p> <p>SNP should promote the preferred option of SANG's in relation to protection of the European Dedicated Habitat sites as that diverts footfall from those sites whilst providing better green spaces for our community.</p> <p>Map 7 doesn't accurately replicate the intended purpose of the proposed green (Ipswich ring) corridor</p> <p>Policy Maps</p> <p>There is an inconsistency in application of JLP policy to the Settlement Boundaries shown.</p> <p>LA116 which is still a proposed JLP site and now reduced to 40 homes by BMSDC from the 50 homes application rejected in the appeal is not included and therefore does not conform with the JLP. This was rejected in the appeal on Heritage Grounds which are duplicated in the JLP Heritage Impact Assessment.</p> <p>LA013 which is proposed in the JLP and for which an application has been submitted. This includes a significant parcel of land West of Church Lane, Red House and Hadleigh Rd. which is however rejected for development by the JLP's own Heritage Impact Assessment on similar grounds to LA116. However this is included in the SNP's defined Settlement Boundary.</p> <p>As these are similar issues not yet decided the SNP should either define the Settlement Boundary as provisional subject to JLP approval of allocated sites.</p> <p>Or if corrections to the SNP Settlement Boundary in consequence of final JLP allocation is allowed then both dealt with the same way. Either both provisionally excluded or both provisionally included</p>		
C Fuller	-	<p>I can broadly support much of the content of many policies, but I believe the text and context should be adjusted as indicated within my consultation response. My consistent 'No' recognises that each policy does not sit in isolation but is set within the policy suite with reference to supporting text. Thus, I believe there needs to be adjustments to the vision and the policies /text that flows with a clear emphasis on ensuring</p>	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>sustainable development, sustainable communities, environmental net gain, high quality of life & good well being objectives are adequately met, as necessary within the relevant hierarchical structure of local plan & national policies.</p> <p>The only policy where I have supported with a 'yes' is for Q34 because at least the text in section 12 refers to the traffic problem and I want to ensure this matter is not overlooked and subsequently ignored, which would be consistent with my experience to date over the last fifteen years. I acknowledge addressing these issues may be complex but the plan needs to be ambitious & influence the outcomes for the benefit of current & future parish residents and this is a fundamental issue of quality of life & well-being. Additionally, the current environmental assets of sproughton should not be undervalued and the plan needs to more ambitiously promote enhancement & expansion of its green infrastructure as part of delivering environmental net gain & sustainable communities for the benefit of residents & visitors.</p>	Noted	None
C Harris	-	<p>Whilst I do support the policy SPTN8 for settlement gaps, it seems to me that the Map 5 does not adequately specify their extent. The Map 5 shows red lines and checkered lines, but I don't find their purpose defined in the text or identified in a key. There appears to be no constraint in the Wolsey Grange settlement extending west (beyond the A14).</p>	I is considered that the Plan provides sufficient certainty.	None
D Taylor	-	<p>The document has been very well researched, considered and expressed and I am very grateful for the extensive work done on it.</p> <p>My only slightly negative comment would be that at a glance, unless positioned with text about our problems, photos give the impression that they convey items that we approve or are proud of, whereas pictures like the 2 1/2 storey development at Wolsey Grange on page 49 (which is juxtaposed with text about good design) would be an example of design we would refuse.</p>	<p>Noted and thanks</p> <p>Noted</p>	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		Maybe a picture of sensitive design (if there is one) would give a more aspirational impression?		
C Taylor	-	Well done in producing a comprehensive & generally sensible plan	Noted and thanks	None
M Levett	-	<p>1. I have read the Draft Plan twice and i commend the skilful and thoughtful manner in which it has been drafted and presented.</p> <p>2. I have questions on :</p> <p>a. page 62 the Village Centre Insert map.</p> <p>b. Is this red line the existing Settlement Boundary of the village (ie. that it includes the dark olive green area adjacent to the allotments?)</p> <p>c. I understood the SPTN 8 Settlement Gap to be within this olive coloured area but it is not as far as i know the Village Settlement Boundary.</p> <p>2. It is a critical feature for satellite villages not to suffer from any urban sprawl. Likewise for those villages it is important that there is no fused coalescence with adjoining villages. These points can be protected by consideration of, and including or extending</p> <p>a. guarantees that there will be no permitted development on the pasture land of the valley floor which areas of themselves have a real and threatened flood risk and provide essential wild life corridors.</p> <p>b. an extension of the area marked on page 47, map10, where there is a purple coloured area designated "Special Character Area" which in my view should extend further Northwards to fall in line with a point at Wayside Cottage (shown on page 62 Village Centre insert map)</p> <p>c. the assurance that the entire area known as Cardinal Field (allocated site LA116 (Map 3 red hatched area 2 para 6.2) is included in SPTN 15 to protect the setting of the Cluster of Heritage Assets (SPTN 13 & 14) and the important views from public vantage points (SPTN 9).</p>	<p>Noted</p> <p>The Plan seeks to prevent this.</p> <p>The Settlement Boundaries limit the extent of development.</p> <p>The Landscape Appraisal did not recommend this.</p> <p>The area covered by Policy SPTN15 has been carefully considered.</p>	None
S Catermole	-	Just a thank you to those involved in preparing the document. My main concerns mirror those negative aspects mentioned in	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>1.23: Traffic and footpaths being narrow. These are of concern in the high Street and Lower Street but also closer to me along the upper part of Hadleigh Road. Plans submitted for Wolsey Grange 2 do not take into account the narrow footway provision and traffic using this road.</p>		
<p>J Pateman-Gee</p>		<p>Need policy on adverts and perhaps avoiding illumination of such in all the special areas designated in the NP.</p> <p>This NP is going to be there for 20 years and lot can happy to the NP area in that time. The High Street is a problem and this entire document fails to do anything about it.</p> <p>There is an opportunity for a bypass of sorts. Even if it is a one way circuit. Ransomes Close could still have green to the rear, but a small development and opportunity for road could save the village character..</p> <p>See below.</p> 	<p>This is not considered necessary</p> <p>Allocations of this nature in a development plan document have to demonstrate that they are deliverable. This would include a demonstration that the land is available and that the proposal is viable. This has not been demonstrated in support of the comment.</p>	<p>None</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
	<p>Pigeon Investment Management Ltd and the Felix-Thornley Cobbold Agricultural Trust</p>	<p>Thank you for consulting Pigeon Investment Management Ltd ('Pigeon') and the Felix-Thornley Cobbold Agricultural Trust ('the Trust') on the Regulation 14 Sproughton Neighbourhood Plan ('the SNP'). We very much welcome the opportunity to participate in the current Regulation 14 consultation.</p> <p>Pigeon is a privately owned company based in the Eastern Region, which specialises in high quality, landscape and design led sustainable development. As such, we support Neighbourhood Planning and the role that it can play in delivering a long-lasting positive contribution for local communities.</p> <p>The following comments are provided in the interests of ongoing and future collaborative working between Pigeon, the Trust and Sproughton Parish Council and Babergh District Council and are intended to assist with the ongoing preparation of the Sproughton Neighbourhood Plan.</p> <p>We trust that the above comments will assist with the ongoing preparation of the Sproughton Neighbourhood Plan and request that we are notified when the Parish Council submits the SNP to Babergh District Council, in due course.</p> <p>We also confirm that we are willing to have our contact details shared with Babergh Council for the purpose of enabling Babergh Council to keep us informed of further consultations on the SNP.</p> <p>In the meantime, if it would be of assistance, we would be happy to meet with the Parish Council to discuss our comments.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p>
	<p>Boyer on behalf of Taylor Wimpey UK Ltd</p>	<p>1.1 These representations are submitted by Boyer on behalf of Taylor Wimpey UK Ltd. In response to the consultation on the Sproughton Neighbourhood Plan (SNP) Pre-Submission</p>	<p>Noted</p>	<p>None</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>Consultation (October 2021) under Regulation 14 of the Neighbourhood Planning Regulations.</p> <p>1.2 These representations make specific reference to Land north of the A1071 ("the Site"), as illustrated at Appendix One, which is also identified as allocation LA013 in the emerging Babergh Mid Suffolk Draft Joint Local Plan ("the Draft JLP").</p> <p>1.3 In May 2021, Taylor Wimpey submitted an Outline planning application, with all matters reserved except for access, for the residential development of up to 750 dwellings, up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements on the Site (DC/21/02671).</p> <p>1.4 Prior to the Outline application submission, Taylor Wimpey have been promoting this Site for a number of years through the Draft JLP. Most recently, representations were submitted to the Regulation 19 consultation in December 2020, following which the Draft JLP was formally submitted to the Secretary of State for Housing, Communities and Local Government for independent Examination (Regulation 22) on 31st March 2021. Subsequent to this, Hearing Statements were also submitted in June 2021 in response to the Inspector's Issues, Matters and Questions and Taylor Wimpey have adopted an active role in participating in the Hearing sessions that have been undertaken to date.</p> <p>1.5 The pause to the Draft JLP examination does give uncertainty to its possible adoption timetable, and it is considered that the Pre-submission SNP timetable will need to be amended to ensure it aligns with the Draft JLP and conforms with the emerging strategic policies. This will ensure accordance with the Planning Practice Guidance (Paragraph: 009 Reference ID: 41-009-20190509) which states; "The local planning authority should work with the qualifying body so that</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>It is not necessary for the SNP to be delayed.</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>complementary neighbourhood and local plan policies are produced”.</p> <p>1.6 Taylor Wimpey support the production of the SNP and encourage local residents to undertake an active role in delivering new development in their local area.</p> <p>1.7 As set out within National Planning Practice Guidance (NPPG), Neighbourhood Plan policies should be clear and unambiguous (Paragraph: 041 Reference ID: 41-041-20140306). Moreover, National policy and guidance requires that Neighbourhood Plans are in general conformity with the adopted Local Plan in their area (Paragraph: 065 Reference ID: 41-065- 20140306). Whilst the current adopted Local Plan for Babergh is the Core Strategy 2014, Babergh is preparing a joint Local Plan with Mid Suffolk, which is currently undergoing Examination with an anticipated adoption date of 2022. It is therefore necessary for the preparation of this SNP to be in general conformity with the reasoning and evidence of the emerging Draft JLP to ensure that it is in general conformity with the Local Plan when it is made (Paragraph: 009 Reference ID: 41-009-20190509).</p> <p>1.8 The Neighbourhood Plan should support the delivery of strategic policies contained in the Draft JLP, and should guide and direct development that is outside of these strategic policies.</p> <p>1.9 When considered against the necessary Basic Conditions as required by Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011), it is our view that, as currently drafted, the Pre-submission SNP is not in conformity with the Draft JLP, therefore failing to meet Basic Condition e, which states “the making of the neighbourhood plan is in general conformity</p>	<p>Noted</p> <p>It is considered that the SNP is in conformity with the strategic policies of the adopted and latest emerging local plans.</p> <p>Noted</p> <p>It is considered that the SNP is in general conformity with the strategic policies of the development plan.</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>with the strategic policies contained in the development plan for the area of the authority (or any part of that area)".</p> <p>1.10 This is because the SNP includes policies that are likely to undermine the delivery of the minimum houses identified for Sproughton as set out in strategic policy SP04 of the Draft JLP.</p> <p>1.11 The Basic Conditions relevant to the making of a neighbourhood plan are:</p> <ul style="list-style-type: none"> • Condition a: having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan; • Condition d: the making of the neighbourhood plan contributes to the achievement of sustainable development; • Condition e: the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area); • Condition f: the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and • Condition g: prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for neighbourhood plan. <p>1.12 Section 2 of these representations provides our response to the Pre-submission SNP document, Section 3 provides our review of the relevant supporting documents to the Presubmission SNP, with details of the Site and proposed development sought through planning application (DC/21/02671) set out in Section 4.</p> <p>2.82 We remain concerned that, as currently drafted, the Pre-submission SNP is not in conformity with National Planning Policy or the Draft JLP and would not contribute to the</p>	<p>The Inspectors examining the JLP have proposed that Policy SP04 is deleted from the Plan.</p> <p>The Parish Council is aware of the Basic Conditions.</p> <p>Noted</p> <p>The Parish Council is satisfied that the SNP, as submitted, will satisfy the Basic Conditions.</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		achievement of sustainable development, and as such would fail to meet the necessary Basic Conditions as required under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).		
	Boyer on behalf of Taylor Wimpey UK Ltd	<p>PRE-SUBMISSION SNP: SUPPORTING DOCUMENTS</p> <p>3.1 It is acknowledged that the Pre-submission SNP is supported by a number of supporting documents, some of which it is noted have been prepared by the SNP Sub-Committee.</p> <p>3.2 As outlined in response to the questions set out above, we have fundamental concerns with regards to the content of some of these documents, notably the supporting landscape documents, as discussed in greater detail below. As currently proposed, we consider that the Pre-submission SNP and supporting landscape documents seek to undermine the Draft JLP and its evidence base, particularly in respect of LA013.</p> <p>Landscape Appraisal (Alison Farmer Associates; February 2021)</p> <p>3.3 As a component of the Pre-submission SNP supporting documents, a Landscape Appraisal of the parish was produced by Alison Farmer Associates in February 2021. This appraisal aimed to provide robust evidence to support judgements on the sensitivity of land and its capacity to accommodate housing development from a landscape/settlement perspective. Four local assessment areas were identified within the appraisal with Local Area 4 encompassing Chantry Vale and Hermitage Farm. The area to the east of the A14 within Local Area 4 (Chantry Vale) has been predominantly allocated for development in the emerging local plan under Policy LA013.</p> <p>3.4 The Landscape Appraisal's assessment of Local Area 4 came to the following conclusion: The valley sides around The Red House have a high sensitivity (despite being east of the A14 and in close proximity to the</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Agreed</p>	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>existing urban edge of Ipswich) due to their intact rural character, setting to historic buildings at Red House, visual connectivity to the wider landscape to the west and high visibility. The proximity of this area of countryside, close to Ipswich is in easy reach of the local population and forms valued access to natural greenspace as well as a distinctive and high-quality approach to Ipswich. This landscape has little to no capacity for further development without loss of these qualities. Furthermore, farmland immediately surrounding Red House Farm is covenanted, restricting its use other than as agricultural land.</p> <p>3.5 This assessment appears to have led SPC to allocate significant proportions of Chantry Vale as valued landscape within their Pre-submission SNP, seeking to nullify the potential for residential development and comprehensive delivery of LA013.</p> <p>3.6 We object to the conclusions reached within the Landscape Appraisal and remain concerned that these fail to align with evidence published by BMSDC underpinning the Draft JLP evidence base, as well as the Environmental Statement produced by Boyer on behalf of Taylor Wimpey regarding site LA013, ultimately undermining the evidence base supporting the Draft JLP</p> <p>3.7 To support their Draft JLP, BMSDC published the Babergh and Mid Suffolk Landscape Sensitivity Assessment of SHELAA Sites. This document assessed each site identified within the SHELAA to determine impacts that development would have on the landscape. Within the report sites SS0191, SS0954, SS1024 were assessed in unison as they combine to form LA013. The assessment of these sites used similar criteria to that utilised within the Sproughton landscape appraisal, with the conclusion reached that:</p>	<p>Policy LA013 of the JLP is to be deleted from the Local Plan.</p> <p>The Landscape Appraisal is a professionally prepared and detailed appraisal of what exists by a well-respected consultant.</p> <p>The Sensitivity Assessment is a higher level assessment than the SNP Landscape Appraisal.</p>	

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		<p>"These sites are assessed as having moderate sensitivity to residential development due to the undulating agricultural character, close proximity to heritage assets, and strong connection to Ipswich. The road network and lack of semi-natural features reduce sensitivity."</p> <p>3.8 The sites are adjudged to have moderate sensitivity to residential development, not high sensitivity as was claimed by the Landscape Appraisal supporting the Pre-submission SNP. The Landscape Appraisal supporting the Pre-submission SNP also claims that the site has little to no capacity for further development, which clearly does not align with the conclusion reached by BMSDC and supporting evidence to the Draft JLP. Indeed, the conclusions of SNP undermine and disregard the Draft JLP therefore failing to meet basic condition e) under Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011).</p> <p>3.9 BMSDC's Sustainability Appraisal assessed the sustainability issues and effects of emerging plans and policies, including Policy LA013. The table below is an extract from Table 7.21 of the Sustainability Appraisal showing a Summary of SA scores for place and allocations policies. Outlined in red are the scores given to Policy LA013 regarding landscape/townscape.</p> <table border="1"> <thead> <tr> <th>Allocation Policy</th> <th>Size</th> <th>Dwellings</th> <th>Site ref.</th> <th>Purpose</th> <th>SA1: Weight and SA2: Evaluation and SA3: Accessibility</th> <th>SA4: Housing</th> <th>SA5: Water</th> <th>SA6: Air Quality</th> <th>SA7: Noise and SA8: Vibration</th> <th>SA9: Flood Risk</th> <th>SA10: Green Change</th> <th>SA11: Climate Change Appraisal</th> <th>SA12: Biodiversity</th> <th>SA13: Air Quality</th> <th>SA14: Landscape</th> <th>SA15: Townscape</th> <th>SA16: Heritage</th> <th>SA17: Sustainability</th> </tr> </thead> <tbody> <tr> <td>LA114: Land north of Red Hill Road / Malton Road, Haverigg</td> <td>3.2ha</td> <td>75</td> <td>S50584</td> <td>Residential</td> <td>++</td> <td>+</td> <td>++</td> <td>+</td> <td>+</td> <td>+</td> <td>N/A</td> <td>+</td> <td>-</td> <td>-</td> <td>0</td> <td>0</td> <td>+</td> <td>+</td> </tr> <tr> <td>LA058: Land east of Ipswich Road, Hobrook</td> <td>0.3ha</td> <td>7</td> <td>S50717</td> <td>Residential</td> <td>++</td> <td>++</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>N/A</td> <td>+</td> <td>0</td> <td>-</td> <td>0</td> <td>0</td> <td>+</td> <td>+</td> </tr> <tr> <td>LA069: Land north west of Melford Road, Lavenham</td> <td>0.57ha</td> <td>20</td> <td>S50288</td> <td>Residential</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>+</td> <td>N/A</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>+</td> </tr> <tr> <td>LA098: Land south of High Road, Lavenham</td> <td>5.29ha</td> <td>40</td> <td>S50587</td> <td>Residential</td> <td>+</td> <td>+</td> <td>++</td> <td>+</td> <td>+</td> <td>+</td> <td>N/A</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>+</td> </tr> <tr> <td>LA113: Land east of the B1064, Long Melton</td> <td>8.8ha</td> <td>150</td> <td>S50812</td> <td>Residential</td> <td>++</td> <td>+</td> <td>0</td> <td>+</td> <td>+</td> <td>+</td> <td>N/A</td> <td>+</td> <td>0</td> <td>-</td> <td>0</td> <td>0</td> <td>+</td> <td>+</td> </tr> <tr> <td>LA075: Land south of The Street, Shotley</td> <td>2.98ha</td> <td>50</td> <td>S50208</td> <td>Residential</td> <td>++</td> <td>+</td> <td>0</td> <td>++</td> <td>+</td> <td>+</td> <td>N/A</td> <td>+</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>+</td> </tr> <tr> <td>LA012: Land north of Buntall Lane and west of B1113, Sproughton</td> <td>10.6ha</td> <td>105</td> <td>S50223</td> <td>Residential</td> <td>++</td> <td>+</td> <td>+</td> <td>++</td> <td>+</td> <td>+</td> <td>N/A</td> <td>++</td> <td>-</td> <td>-</td> <td>0</td> <td>0</td> <td>+</td> <td>+</td> </tr> <tr> <td>LA013: Land north of the A1071, Sproughton</td> <td>47.6ha</td> <td>800</td> <td>S50191 S50954 S51024</td> <td>Residential</td> <td>++</td> <td>+</td> <td>++</td> <td>++</td> <td>+</td> <td>+</td> <td>N/A</td> <td>++</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>+</td> <td>+</td> </tr> <tr> <td>LA014: Land at Poplar Lane, Sproughton</td> <td>12ha</td> <td>479ⁱⁱ</td> <td>S50299</td> <td>Residential</td> <td>++</td> <td>+</td> <td>++</td> <td>++</td> <td>+</td> <td>+</td> <td>N/A</td> <td>++</td> <td>0</td> <td>-</td> <td>-</td> <td>0</td> <td>+</td> <td>+</td> </tr> </tbody> </table>	Allocation Policy	Size	Dwellings	Site ref.	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LA075: Land south of The Street, Shotley	2.98ha	50	S50208	Residential	++	+	0	++	+	+	N/A	+	0	0	0	0	+	+																																																																																																																																																																																
LA012: Land north of Buntall Lane and west of B1113, Sproughton	10.6ha	105	S50223	Residential	++	+	+	++	+	+	N/A	++	-	-	0	0	+	+																																																																																																																																																																																
LA013: Land north of the A1071, Sproughton	47.6ha	800	S50191 S50954 S51024	Residential	++	+	++	++	+	+	N/A	++	0	0	0	0	+	+																																																																																																																																																																																
LA014: Land at Poplar Lane, Sproughton	12ha	479 ⁱⁱ	S50299	Residential	++	+	++	++	+	+	N/A	++	0	-	-	0	+	+																																																																																																																																																																																

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		<p>3.10 The three parcels were assessed as resulting in a minor negative harm to landscape/townscape. Similar to the BMSDC Landscape Sensitivity Assessment, this presents a very different conclusion to that drawn by the Landscape Appraisal submitted as supporting evidence to the Pre-submission SNP. Minor negative harm does not equate to the high sensitivity that SPC's commissioned Landscape Appraisal identified regarding the site.</p> <p>3.11 The Environmental Statement submitted in support of planning application DC/21/02671 and relating to allocation LA013 provided an assessment of the likely significant environmental effects of the project and helps to ensure that the importance of these effects, and the scope for reducing them, are properly understood by the public and the relevant authorities. Table 11.2 of the Statement provides a summary of the effects on the landscape in both the construction and operational phase. It was concluded that there will be a small number of negligible effects, however none of the effects are deemed to be major. The table also demonstrates that mitigation/enhancement measures will be applied to reduce residual effects where possible. This site specific and thorough Environmental Statement failed to identify any areas in which LA013 would be at high sensitivity to residential development.</p> <p>3.12 Given the fact that three reports (BMSDC's Sustainability Appraisal; BMSDC Landscape Sensitivity Assessment; and the Environment Statement submitted with application DC/21/02671), completed independent of each other, fail to reiterate the conclusions reached by the Landscape Appraisal commissioned by SPC, serious questions should be asked about the veracity of the Landscape Appraisal supporting document to the Presubmission SNP. SPC's desire to allocate large swathes of Chantry Vale as protected and valued landscape does not have sufficient or appropriate evidence to support it and is contradictory to all existing analysis of the site and</p>	<p>Noted</p> <p>This will be a matter for Babergh District Council to consider when determining the planning application.</p> <p>Noted</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>ultimately, its assessment undermines the Draft JLP evidence base.</p> <p>4. LAND NORTH OF THE A1071, IPSWICH</p> <p>Introduction</p> <p>4.1 Taylor Wimpey are pleased to note that the Land North of the A1071 is identified as an allocation in the Pre-submission NDP, which aligns with the Draft JLP. That being said, and as set out in the preceding Sections, fundamental concerns are raised in response to the Parish's proposal to restrict large parts of the emerging allocation from being developed.</p> <p>4.2 The allocation is located on the edge of Ipswich, with approved and partially implemented developments to the north (referred to by Ipswich as the Eastern Gateway) and south (allocation LA014), with the urban edge of Ipswich to the east. The site is therefore in a logical location for accommodating development, and this is a position agreed by Officers at BMSDC through its allocation.</p> <p>4.3 Various forms of consultation and engagement has been undertaken in respect of the emerging allocation over a number of years. This has included various meetings with the Parish over this period. A workshop was also held with the Parish to discuss the evolution of the Proposed Development in May 2019 and a preview session held in advance of the Public Consultation Event in September 2019.</p> <p>4.4 Post-submission meetings have also been held with the Parish following the application submission in May 2021.</p> <p>Outline Planning Application</p> <p>4.5 Following continued site promotion since 2014 and extensive engagement with statutory consultees and the Parish, in May 2021, Taylor Wimpey submitted an Outline planning application, with all matters reserved except for access, for the</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>residential development of up to 750 dwellings, up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements on Land North of the A1071, identified as allocation LA013.</p> <p>4.6 The application (reference: DC/21/02671) is supported by all relevant technical supporting information.</p> <p>4.7 The application is also supported by a number of Parameter Plans that have been informed by landscape and heritage assessments, and restrict the development parcels to the least sensitive areas of the Site. This is an approach which has been informed by extensive discussions with the Councils' appointed Heritage and Landscape Officers over a number of years.</p> <p>4.8 Taylor Wimpey are fully committed to delivering allocation LA013 which will make a positive contribution to the delivery of housing across Babergh and Mid Suffolk over the Neighbourhood and Local plan period.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	
	<p>Avison Young on behalf of National Grid</p>	<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas</p>	<p>Noted</p>	<p>None</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>National Grid provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ <p>Please also see attached information outlining guidance on development close to National Grid infrastructure [not included with this comments table but available on request from the Parish Council].</p>		
	Natural England	<p>Thank you for your consultation on the above dated 2 October 2021.</p> <p>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.</p>	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>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.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex [not included in this summary of comments but available from the Parish Council on request] which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p>		
	<p>Water Management Alliance on behalf of East Suffolk Drainage Board</p>	<p>The Parish Sproughton falls partially within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. A copy of the Board's Byelaws can be accessed on our website (https://www.wlma.org.uk/uploads/ESIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf). These maps also show which watercourses have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB. These maps also show which watercourses have been designated as 'Adopted Watercourses' by the Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD and as such will normally receive maintenance from the IDB. Mapping indicating the watershed catchments of each Board are also available on our website: (https://www.wlma.org.uk/uploads/KLIDB_Watershed.pdf, https://www.wlma.org.uk/uploads/NRIDB_Watershed.pdf).</p>	<p>Noted</p>	<p>None</p>

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.</p> <p>In order to avoid conflict between the planning process and the Board's regulatory regimes and consenting processes where developments are proposed within or partially within a Board's IDD, please be aware of the following:</p> <ul style="list-style-type: none"> • If a development proposes to dispose of surface water via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency. If (following testing) a strategy wholly reliant on infiltration is not viable and a surface water discharge is proposed to a watercourse, the proposed development will require consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy (available at https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf). • If a development proposes to discharge surface water to a watercourse, the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy. (available at https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf). 	<p>These are matters for consideration at the planning application stage.</p>	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<ul style="list-style-type: none"> • If a development proposes to discharge surface water to a sewer, I recommend that you satisfy yourselves that this proposal is in line with the drainage hierarchy (as per best practice) and is viable in this location. • If a development proposes to discharge treated foul water to a watercourse, this proposal will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). • Should any development include works within 9 metres of a Board adopted watercourse, consent would be required to relax Byelaw 10 (no obstructions within 7 metres of the edge of drainage or flood risk management infrastructure). • Should any development include works to alter a Board Adopted watercourse consent will be required under the Land Drainage Act 1991 (and byelaw 4). • Should and works be proposed to alter a riparian watercourse, consent would be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4). • Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application. <p>For developments outside a Board's IDD but within its watershed catchment, where surface water discharges have the potential to indirectly affect the Board's IDD, we would offer the following advice:</p> <ul style="list-style-type: none"> • If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced. As such we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of 	Noted	

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.</p> <ul style="list-style-type: none"> • If it is proposed to discharge surface water to a watercourse within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible. • The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 163 of the National Planning Policy Framework). For further information regarding the Board's involvement in the planning process please see our Planning and Byelaw Strategy, available online. 		
	Suffolk County Council	<p>Thank you for consulting Suffolk County Council (SCC) on the Pre-Submission version of the Sproughton Neighbourhood Plan.</p> <p>SCC 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:</p> <ul style="list-style-type: none"> - Archaeology - Education - Fire and Rescue - Flooding - Health and Wellbeing - Libraries - Minerals and Waste 	Noted	None

Name	Organisation	Comment	Parish Council Response	Proposed Changes
		<p>and an onsite pre-school, which is more sustainable in the long term.</p> <p>In addition to the new primary school within the Wolsey Grange Development, future expansion of Sroughton Church of England Primary School from 105 to 140 places may be considered to meet demand where required.</p> <p>Secondary Education</p> <p>The parish of Sroughton is served by more than one secondary school catchment area. Much of the development proposed in Sroughton will be mitigated via expansion of Chantry Academy due to the proximity of the proposed developments to that school.</p> <p>In regard to Claydon High School, our response to the local plan was as follows:</p> <p>The number of pupils arising from the Local Plan sites, alongside other planning applications in the catchment area, means the school is currently forecast to exceed 95% capacity. Contributions are expected to be sought to enable expansion. However, it is expected that demand from development and background population will mean that the level of expansion that is possible on the existing site may not be sufficient to mitigate this growth. The remainder of the additional demand will be met through out-of-catchment pupils from Ipswich being diverted back to Ipswich secondary schools in the longer term. Significant available capacity exists at Westbourne High School and the new Ipswich Garden Suburb secondary is planned to provide for the north and west of Ipswich. If needed, temporary places could be provided at schools in Ipswich, to manage short-term excess demand.</p>		

Name	Organisation	Comment	Parish Council Response	Proposed Changes																				
		<table border="1" data-bbox="526 140 1256 687"> <thead> <tr> <th data-bbox="526 140 701 177"></th> <th data-bbox="701 140 898 177">Status</th> <th data-bbox="898 140 1075 177">Primary Catchment</th> <th data-bbox="1075 140 1256 177">Secondary Catchment</th> </tr> </thead> <tbody> <tr> <td data-bbox="526 177 701 260">LA012 Land north of Burstall Lane West of Loraine Way, 10.6ha for x105 dwellings</td> <td data-bbox="701 177 898 260">Pending application DC/19/00567/HYB for 105 dwellings</td> <td data-bbox="898 177 1075 260">Sproughton Church of England Primary</td> <td data-bbox="1075 177 1256 260">Claydon High School</td> </tr> <tr> <td data-bbox="526 260 701 453">LA013 Land North of A1071, 47.6ha for x800dw including 3ha land for preschool & primary school</td> <td data-bbox="701 260 898 453">Pending application DC/21/02671/OUT for 750 dwellings</td> <td data-bbox="898 260 1075 453">Sprites Primary Academy / Sproughton Church of England Primary This development will be mitigated by the provision of a new primary school within this site.</td> <td data-bbox="1075 260 1256 453">Chantry Academy / Claydon High School This development will be mitigated via expansion of Chantry Academy</td> </tr> <tr> <td data-bbox="526 453 701 627">LA014 Land at Poplar Lane, 12ha for x475 dwellings, 4ha employment land & primary school</td> <td data-bbox="701 453 898 627">Approved application B/15/00993/OUT for 475 dwellings</td> <td data-bbox="898 453 1075 627">Cpodock Primary School / Sprites Primary Academy This development will be mitigated by the provision of a new primary school within site LA013</td> <td data-bbox="1075 453 1256 627">East Bergholt High School / Chantry Academy This development will be mitigated via expansion of Chantry Academy</td> </tr> <tr> <td data-bbox="526 627 701 687">LA116 Land east of Loraine Way, 3.4ha for x50 dwellings</td> <td data-bbox="701 627 898 687">Local plan allocation</td> <td data-bbox="898 627 1075 687">Sproughton Church of England Primary</td> <td data-bbox="1075 627 1256 687">Claydon High School</td> </tr> </tbody> </table> <p data-bbox="515 778 766 805">Minerals and Waste</p> <p data-bbox="515 815 1263 986">Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means the County Council makes planning policy and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan, adopted in July 2020.</p> <p data-bbox="515 1029 1258 1236">The County Council has assessed the neighbourhood plan regarding the safeguarding of potential minerals resources and operating minerals and waste facilities. Site allocations have already been assessed through the local plan process. As the neighbourhood plan is not allocating further sites SCC has no concerns with the proposals in the plan.</p> <p data-bbox="515 1278 616 1305">General</p> <p data-bbox="515 1315 1236 1417">Maps Some maps are of a low-quality resolution, and therefore it is difficult to see any fine detail.</p>		Status	Primary Catchment	Secondary Catchment	LA012 Land north of Burstall Lane West of Loraine Way, 10.6ha for x105 dwellings	Pending application DC/19/00567/HYB for 105 dwellings	Sproughton Church of England Primary	Claydon High School	LA013 Land North of A1071, 47.6ha for x800dw including 3ha land for preschool & primary school	Pending application DC/21/02671/OUT for 750 dwellings	Sprites Primary Academy / Sproughton Church of England Primary This development will be mitigated by the provision of a new primary school within this site.	Chantry Academy / Claydon High School This development will be mitigated via expansion of Chantry Academy	LA014 Land at Poplar Lane, 12ha for x475 dwellings, 4ha employment land & primary school	Approved application B/15/00993/OUT for 475 dwellings	Cpodock Primary School / Sprites Primary Academy This development will be mitigated by the provision of a new primary school within site LA013	East Bergholt High School / Chantry Academy This development will be mitigated via expansion of Chantry Academy	LA116 Land east of Loraine Way, 3.4ha for x50 dwellings	Local plan allocation	Sproughton Church of England Primary	Claydon High School	<p data-bbox="1294 711 1370 738">Noted</p> <p data-bbox="1294 1283 1697 1310">Theses concerns will be addressed</p> <p data-bbox="1294 1390 1370 1417">Noted</p>	
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		<p>We also remind you that, should you feel it is necessary to make substantive changes to this pre-submission draft plan in response to comments received, it may be appropriate to consult again at this stage prior to formally submitting it and the other required documents to the District Council.</p> <p>Maps The Maps throughout the Plan are of variable quality. While it is appreciated that these are essentially copies of maps prepared elsewhere, every effort should be made to improve their clarity. That includes any 'Key'. Qstn: Are the grey shaded areas on the maps meant to represent the housing site allocations set out in the emerging JLP? If so, and given that [the comment ended here]</p> <p>Appendix 4 We mention this in connection with the Reference Documents on the PC website at: http://sproughton.onesuffolk.net/neighbourhood-plan/reference-documents</p> <p>Some re-organisation of both is needed to help understand what's what. In many cases, document titles and/or version dates do not match so it is unclear what might be draft and what might be the final document. There are also documents listed in Appendix 4 that do not appear to have a corresponding listing on the PC website, e.g., entry # 9. Sproughton parish list of significant buildings - December 2020. We will expect both to have been put right before this NP is formally submitted.</p> <p>Contents page Check and amend the page entry for the Errata. Should this be 71?</p> <p>Glossary</p>	<p>Noted. It is not considered that this is necessary.</p> <p>The quality of maps will be reviewed.</p> <p>These issues will be addressed</p> <p>This will be addressed</p>	

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		Entry should read 'Historic Landscape'	This will be amended	