

Redgrave Neighbourhood Plan 2018 - 2037

**Report by Independent Examiner to Mid Suffolk
District Council**

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Summary and Conclusion

1. The Redgrave Neighbourhood Plan has a clear vision supported by objectives. It is an extremely well written document with detailed background information throughout the Plan that clearly outlines justification for the policies.
2. I have recommended modification to some of the policies in the Plan. In particular, the submitted Plan provides for up to 24 dwellings including a site at Churchway, windfall and infill sites within the settlement boundary and conversions and new development outside the settlement boundary subject to rural constraints. I have recommended that the Plan is modified to provide for a minimum of 24 dwellings with approximately 8 of these on the Churchway site.
3. In the latest revision of the National Planning Policy Framework, paragraph 131 makes it clear that it is the Government's intention that all new streets include trees unless in specific cases there are clear justifiable and compelling reasons why this would be inappropriate. Therefore, to have regard to national policy I have recommended the inclusion of such a requirement in Policy RED11.
4. I have recommended that Policy RED12 only applies to non - residential development.
5. My reasons with regard to all these and other suggested modifications are set out in detail below. None of these significantly or substantially alters the intention or nature of the Plan.
6. **Whilst I have set out my reasoning under individual policies, my overall conclusion is that, subject to my recommendations, the Plan meets the Basic Conditions. It is appropriate to make the Plan. Subject to my recommendations being accepted, I consider that the Redgrave Neighbourhood Plan will provide a strong practical framework against which decisions on development can be made. I am pleased to recommend that the Redgrave Neighbourhood Plan, as modified by my recommendations, should proceed to Referendum.**

Introduction

7. On 20 December 2018 Mid Suffolk District Council (MSDC) approved that the Redgrave Neighbourhood Area be designated in accordance with the Neighbourhood Planning (General) Regulations 2012. The Area covers the whole of the Parish of Redgrave.
8. The qualifying body is Redgrave Parish Council. The Plan has been prepared by a Neighbourhood Plan Steering Group on behalf of the Parish Council. The Steering Group has been assisted by the Neighbourhood Plan Working Group. The Plan covers the period 2018 to 2037.

9. I was appointed as an independent Examiner for the Redgrave Neighbourhood Plan in June 2021. I confirm that I am independent from the Parish Council and MSDC. I have no interest in any of the land affected by the Plan and I have appropriate experience to undertake this examination. As part of my examination, I have visited the Plan area.

Legislative Background

10. As an independent Examiner, I am required to determine, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, whether:
- the policies in the Plan relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
 - the Plan meets the requirements of Section 38B of the 2004 PCPA where the plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area; and
 - that the Plan has been prepared for an area that has been designated under the Localism Act 2011 and has been developed and submitted for examination by a qualifying body.
11. I am obliged to determine whether the Plan complies with the Basic Conditions. The Basic Conditions are:
- having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan;
 - the making of the neighbourhood plan contributes to the achievement of sustainable development;
 - 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; and
 - the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations and human rights requirements.
12. *The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018* came into force on 28 December 2018. They state:

Amendment to the Neighbourhood Planning (General) Regulations 2012.

3.—(1) *The Neighbourhood Planning (General) Regulations 2012(5) are amended as follows.*

(2) *In Schedule 2 (Habitats), for paragraph 1 substitute:*

“Neighbourhood development plans

1. In relation to the examination of neighbourhood development plans the following basic condition is prescribed for the purpose of paragraph 8(2)(g) of Schedule 4B to the 1990 Act(6)—

The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(7).”

13. Since 28 December 2018, A neighbourhood plan is required to be examined against this extra Basic Condition. I will make further reference to this matter under EU Obligations.
14. Subject to the modifications I have recommended in this report, I am content that these requirements have been satisfied.

EU Obligations, Strategic Environmental Assessment (SEA) and Habitat Regulation Assessment (HRA)

15. Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) (EA Regulations) set out various legal requirements and stages in the production of a Strategic Environmental Assessment (SEA).
16. The *Redgrave Neighbourhood Development Plan SEA Screening Opinion* was prepared by Land Use Consultants in September 2020. It explains: *the housing allocation in the Redgrave NDP lies within fairly close proximity of sensitive features including a Conservation Area and listed buildings. Of particular significance is the proximity of the proposed development to the nationally and internationally designated Redgrave and Lopham Fen and the fact that the allocated site is located within Impact Risk Zones associated with the Site of Special Scientific Interest, which flag any development that could cause air pollution as a potential risk. The presence of high quality agricultural land and a County Wildlife Site within the parish add to its sensitivity. It concludes: given the sensitivity of the area in which the allocated site is located, it is considered that the Redgrave NDP has the potential to have significant environmental effects and that SEA is therefore required.* Natural England concurred with this opinion.
17. MSDC prepared a *Redgrave Neighbourhood Plan Strategic Environmental Assessment (SEA) Screening Determination* in November 2020. It states: *In the light of the SEA Screening Report prepared by Land Use Consultants and the responses from the statutory bodies it is determined that a*

precautionary approach is necessary and that the Redgrave Neighbourhood Plan does require a Strategic Environmental Assessment in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004.

18. Based on the screening determination and consultee response, I consider that it was necessary for the Plan to require a full SEA Assessment.
19. *A Strategic Environmental Assessment (SEA) for the Redgrave Neighbourhood Plan* was prepared by AECOM in April 2021. It was published alongside the submission version of the Plan. The SEA considered reasonable alternatives. Four alternative sites for residential development were considered to meet the community preference for targeted needs for smaller homes. These include the Land at Churchway which was allocated in the Regulation 14 Pre-Submission version of the Plan. The preferred allocation strategy has not changed as a result of the SEA. The findings of the SEA have built upon the evidence base supporting the key reasons for the progression and rejection of options. In addition, The SEA appraised the Submission Plan under eight SEA theme headings. Overall, the assessment has determined that the current version of the Plan is likely to lead to predominately positive effects. I am satisfied that The SEA accords with the provisions of the European Directive 2001/42/EC.
20. As regards HRA, the *Redgrave Neighbourhood Plan 2018-2036: Regulation 14 Pre-Submission Draft Habitats Regulations Assessment (HRA): Screening Report* was prepared by Place Services in October 2020. Two habitats sites, Redgrave & South Lopham Fens Ramsar site and Waveney & Little Ouse Valley Fens SAC, were assessed for any likely significant effects resulting from the Redgrave Neighbourhood Plan Regulation 14 Pre-Submission Draft as the Plan area lies within the 5km Impact Risk Zone of these habitats sites.
21. The HRA report screened out impact pathways for recreational disturbance and water quality and quantity, and determined that no likely significant effects on designated features are likely as a result of the draft Plan alone. It also found that there is currently no potential for any likely significant effects in combination with other plans and projects. Therefore, the draft Plan was been screened out for any further assessment (Appropriate Assessment).
22. The report concludes: *subject to Natural England's review, this HRA Screening Report concludes that the Redgrave Neighbourhood Plan Regulation 14 Pre-Submission Draft is not predicted to have any Likely Significant Effect on any Habitats site, either alone or in combination with other plans and projects. The content of the modification draft Redgrave Neighbourhood Plan has therefore been screened out for any further assessment and Mid Suffolk DC can demonstrate its compliance with the Conservation of Habitats and Species Regulations 2017 (as amended).* Natural England concurred with this opinion.

23. MSDC prepared a *Habitats Regulations Screening Determination* in November 2020. The determination concludes: *In the light of the Screening Report prepared by Place Services and the responses from the Natural England it is determined that the Redgrave Neighbourhood Plan does not require further assessment under the Habitats Regulations 2017.*
24. Based on the screening determination and consultee response, I consider that the Plan does not require a full HRA under Articles 6 or 7 of the Habitats Directive. I am satisfied that the Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(7).
25. A Neighbourhood Plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant. I am satisfied that the Plan is compatible with EU obligations and does not breach the European Convention on Human Rights obligations.

Policy Background

26. Just before the start of this examination, the Government published a revised *National Planning Policy Framework* (NPPF) (2021), which sets out the Government's planning policies for England and how these are expected to be applied. The *Planning Practice Guidance* (2014) (PPG) provides Government guidance on planning policy.
27. I have examined the Plan against policies in this revised NPPF. As the Plan was prepared under the 2019 NPPF, I asked for a further two - week consultation period inviting comments on the affect of the revised NPPF on how the Plan meets the Basic Conditions.
28. At the heart of the NPPF is the presumption in favour of sustainable development. Paragraph 8 sets out the three overarching objectives which are interdependent and need to be pursued in mutually supportive ways. The three overarching objectives are:
 - a) *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

29. Redgrave Parish is within the local authority area of Mid Suffolk District Council (MSDC). The development plan for the Redgrave Neighbourhood Plan Area comprises the saved policies in the Mid Suffolk Local Plan (1998); The Mid Suffolk Local Plan First Alteration: Affordable Housing (2006); The Mid Suffolk Core Strategy Development Plan Document (2008); and The Mid Suffolk Core Strategy Focused Review (2012).
30. The strategic policies in the development plan include policies regarding housing provision and the conservation and enhancement of the natural and historic environment.
31. MSDC with Babergh District Council published a new Joint Local Plan Pre-Submission (Regulation 19) Consultation Document for public consultation in November 2020. This covers the period to 2037. It was submitted for examination in March 2021.

The Neighbourhood Plan Preparation

32. I am required under The Localism Act 2011 to check the consultation process that has led to the production of the Plan. The requirements are set out in Regulation 14 in The Neighbourhood Planning (General) Regulations 2012.
33. The initial consultation process began in July 2019 with a questionnaire delivered to all households. The Steering Group held a workshop meeting in September 2019, to establish a draft vision and a set of draft objectives. The Steering Group undertook a 'Call for Sites' between October and November 2019. This resulted in five sites being put forward for potential development. Drop in sessions were held in November and December 2019 where draft policies were shared with the local residents and businesses. A feedback session was held in January 2020.
34. A Neighbourhood Plan web page provided details of the progress of the Neighbourhood Plan and notes from Steering Group meetings, together with copies of the consultation materials and exhibition boards used for consultation events, together with feedback from those events. Details of all consultation events were also published in the Parish newsletter. Posters and flyers were used to publicise events and banners were erected.
35. The Consultation period on the pre-submission draft of the Plan ran from 14 September 2020 to 8 November 2020. Copies of the Plan were placed on the website and hard copies available for loan in the community shop. A

flyer was distributed to every household. Consultation was publicised via the website, and two articles in the Parish Magazine.

36. I am satisfied that the pre-submission consultation and publicity has met the requirements of Regulation 14 in The Neighbourhood Planning (General) Regulations 2012. The consultation and publicity met the requirements and it is clear that the qualifying body sought to ensure that local residents and businesses were able to engage in the production of the Plan. I congratulate them on their efforts, especially during the challenging period of the pandemic.
37. MSDC publicised the submission Plan for comment during the publicity period between 26 May 2021 and 16 July 2021 in line with Regulation 16 in The Neighbourhood Planning (General) Regulations 2012. A total of ten responses were received. A further two responses were received to the additional two - week consultation. I am satisfied that all these responses can be assessed without the need for a public hearing.
38. Some responses suggest additions and amendments to policies. My remit is to determine whether the Plan meets the Basic Conditions. Where I find that policies do meet the Basic Conditions, it is not necessary for me to consider if further suggested additions or amendments are required. Whilst I have not made reference to all the responses in my report, I have taken them into consideration. I gave the Parish Council the opportunity to comment on the Regulation 16 representations. I have taken their comments into consideration. Their comments have been placed on the MSDC web site. The further consultation period responses did not raise any issues. Therefore, it was unnecessary for the Parish Council to make further comment.

The Redgrave Neighbourhood Plan

39. Paragraph 16 in the NPPF requires plans to be prepared positively, in a way that is aspirational but deliverable; and serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. In addition, paragraph 16 in the NPPF requires plans to contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.
40. PPG states: *A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.* (Paragraph: 041 Reference ID: 41-041-20140306).

41. I do refer to clarity and precision with regard to some recommendations to modifications to the Plan. Where I do so, I have in mind the need for clear and unambiguous policies, thus ensuring that the Plan has regard to national policy in this respect.
42. It is not for me to re-write the Plan. Where I have found editing errors, I have identified them as minor editing matters and highlighted these as such. These have no bearing on whether the Plan meets the Basic Conditions.
43. Policies in a neighbourhood plan can only be for the development and use of land. Where there are community aspirations (identified as Community Action Projects in this Plan) these have to be clearly differentiated from policies for the development and use of land.
44. Background information is provided throughout the Plan. A clear vision for the Parish has been established and is supported by seven objectives. The vision refers to the year 2036. I assume that a previous version of the Plan was for a plan period up to 2036. As the Plan now extends to 2037 and as paragraph 5.1 clearly refers to the vision being an overarching statement describing what Redgrave should be like at the end of the Plan period, the vision should refer to the end date of 2037. **I see this as a minor editing matter.**
45. At paragraph 3.7, the updated text incorrectly states that Hinterland Villages across Mid Suffolk are expected to deliver 11,267 new dwellings over the plan period 2018 to 2037. The figure should read 1,267. I have spotted a Typo in paragraph 2.22. Cross referencing to a number of Maps in many of the policies is not correct. The paragraph numbering from page 78 onwards needs revising. **I see these as minor editing matters.**
46. There are references to the NPPF (2019) throughout the Plan. These need to be changed to the relevant sections of the revised NPPF (2021). Whilst this is an onerous task, it is necessary to ensure that the Plan has regard to national policy.
47. **Recommendation: to meet the Basic Conditions, I recommend that all references to the NPPF (2019) throughout the Plan are revised where necessary to refer to the relevant sections of the revised NPPF (2021).**
48. The maps in the Plan are difficult to read in detail. In particular, it is difficult to distinguish the Settlement Boundary from the Conservation Area Boundary. In the interest of precision, they should all be on an Ordnance Survey base with some of the main roads identified and at a scale where the policies/proposals are clear to identify.
49. **Recommendation: to meet the Basic Conditions, I recommend that all maps in the Plan are on an Ordnance Survey base with some of the main roads identified and at a scale where the policies/proposals are clear to identify.**

50. I now turn to the policies in the Plan. For ease of reference, I have used the same policy titles as those in the Plan. I have briefly explained national policy and summarised main strategic policies where relevant to each neighbourhood plan policy. I have tried not to repeat myself. Where I have not specifically referred to other relevant strategic policy, I have considered all strategic policy in my examination of the Plan.

Community

RED1 New Housing

51. Paragraph 78 in the NPPF states: *in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Paragraph 80 seeks to avoid the development of isolated homes in the countryside unless certain circumstances apply such as an essential need for a rural worker or the re-use of a redundant building.*
52. Core Strategy Policy CS1 identifies Redgrave as a Secondary Village. These are villages unsuitable for growth but capable of taking appropriate residential infill and development for local needs only. Whilst Core Strategy Focused Review Policy FC 2 outlines the provision and distribution of housing in the District, this is not up to date.
53. There is no legal requirement to test the Neighbourhood Plan against emerging policy although PPG advises that the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which the neighbourhood plan is tested. The qualifying body and the local planning authority should aim to agree the relationship between policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan, with appropriate regard to national policy and guidance.
54. The neighbourhood plan was prepared alongside the emerging Joint Local Plan Pre-Submission (Regulation 19) Document.
55. Policy SP03 in the emerging Joint Local Plan Pre-Submission Document identifies Redgrave as a Hinterland Village. Emerging Policy SP03 allows for development within the settlement boundaries subject to a list of criteria including sympathetic design, a high standard of landscaping and retention of existing hedgerows and treelines where they make an important contribution to the setting.
56. Policy RED1 refers to Redgrave being a Hinterland Village. This is not technically correct until confirmed in an adopted Joint Local Plan. Therefore, such a reference should be removed.
57. The Joint Local Plan Pre-Submission document is yet to be considered in detail at examination and the emerging housing figures may change as a

result of that examination. It is not for me to undertake a detailed assessment of the emerging housing figures in the Joint Local Plan.

58. PPG advises that *a neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy.* It further advises that *national planning policy states that it should support the strategic development needs set out in strategic policies for the area, plan positively to support local development and should not promote less development than set out in the strategic policies (see paragraph 13 and paragraph 29 of the National Planning Policy Framework).* *Nor should it be used to constrain the delivery of a strategic site allocated for development in the local plan or spatial development strategy.* (Extracts from PPG Paragraph: 044 Reference ID: 41-044-20190509).
59. The minimum housing requirement in the emerging Joint Local Plan Pre-Submission Document for Redgrave is 11 dwellings. From the evidence before me, I consider the indicative housing figure provides me with the best guidance on total housing numbers for the Parish and I have also taken into account that 16 dwellings had planning permission as of 24 August 2020.
60. National policy emphasises that development means growth. Policy RED1 has sought to provide for sustainable growth by providing for up to 24 dwellings during the Plan period. This figure includes the 16 dwellings with planning permission. Up to 8 dwellings are proposed to be delivered on a site at Churchway. The policy also makes allowance for windfall and infill sites within the settlement boundary and for conversions and new development opportunities outside the settlement boundary subject to rural constraints.
61. MSDC has welcomed the proposal for additional dwellings. My concern is with the upper limit of ‘up to 24 dwellings’. This does not allow for sustainable development that meets all the criteria for development within this and other policies. Therefore, I recommend that Policy RED1 refers to ‘a minimum of’ 24 dwellings as an overall total and ‘approximately’ 8 dwellings on the site at Churchway. This would contribute towards sustainable development. Paragraph 7.22 should be amended accordingly as **a minor editing matter**.
62. The small number of additional dwellings above that required in the emerging Joint Local Plan would not constrain the delivery of a strategic site and would support the strategic development needs. I will refer to the choice of site in detail under Policy RED2.
63. Policy RED1 refers to the 16 dwellings with planning permission that ‘are not yet constructed’. Some may well be constructed before the Plan is made. Therefore, I suggest deletion of this reference.

64. Policy RED1 refers to an end date of March 2036. I assume this should read 'March 2037' in accordance with the extent of the Plan period.
65. Paragraph 7.21 states that the settlement boundary is that defined in the Joint Local Plan Pre-Submission Document. As that document is currently subject to examination and as the settlement boundary is new, Policy RED1 should define this new settlement boundary. I have suggested modified wording. MSDC has pointed out that the settlement boundary line identified on the maps in this plan appears to follow the one shown in the Regulation 18 Preferred Options Joint Local Plan rather than the line in the Joint Local Plan Pre-Submission Document. Thus, in the interest of precision, the settlement boundary line should be amended to follow that in the Joint Local Plan Pre-Submission Document.
66. Subject to the above modifications, Policy RED1 has regard to national policy, contributes towards sustainable development, and is in general conformity with strategic policy. Modified Policy RED1 meets the Basic Conditions.
67. **Recommendation: to meet the Basic Conditions, I recommend:**
- 1) amendment to the settlement boundary line on all relevant maps to follow that in the Joint Local Plan Pre-Submission Document.**
 - 2) modification to Policy RED1 to read as follows:**
New Housing
The Redgrave Settlement Boundary is identified on Map [XX] and the Policies Map.
The Neighbourhood Plan will accommodate new housing development in Redgrave commensurate with its classification in the Local Plan settlement hierarchy.
This plan provides for a minimum of 24 dwellings to be developed in the Neighbourhood Plan area between April 2018 and March 2037, of which 16 already have the benefit of planning permission. The housing target will be met through a combination of the existing commitment together with:
 - 1) Allocation of a site at Churchway for approximately 8 dwellings.**
 - 2) small 'windfall' sites and infill plots within the Settlement Boundary that come forward during the Plan period and are not specifically identified in the Plan.**
 - 3) conversions and new development opportunities outside the Settlement Boundary where it can be demonstrated that there is a need for the dwelling which is essential for the operation of agriculture, horticulture, forestry, outdoor recreation, and other exceptional uses.**

RED2 Housing Allocation

68. A call for sites was undertaken to identify potential residential sites. The five sites together with a site assessed through the MSDC Strategic Housing and Employment Land Availability Assessment were subject to a Site Options Assessment undertaken by AECOM. Constraints were identified for each of the sites. Further investigations identified some scope for a small area of one of the parcels, which is now identified in Policy RED2 as the Churchway Site.
69. The owners of the wider recreation site raised concern at the Regulation 14 Consultation stage. I note that a larger part of the wider site was being promoted by the landowner for residential development. The site is leased by a charitable trust, the Redgrave Activities Trust for Redgrave village, with the current lease ending in the autumn of 2021.
70. I am satisfied, from the evidence before me, that the choice of site was undertaken in a transparent way with local community involvement. I am satisfied, as far as I can reasonably be expected to be, that the chosen site is deliverable and together with the overall housing strategy in the Neighbourhood Plan will contribute towards the achievement of sustainable development by the provision of sustainable growth.
71. Policy RED2 identifies the site at Churchway for up to 8 dwellings. For the same reasons as explained under Policy RED1, Policy RED2 should refer to an allocation of 'approximately' 8 dwellings on the Churchway site.
72. Developer contributions can only be sought where they meet the tests that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. These tests are set out as statutory tests in the Community Infrastructure Levy Regulations 2010 and paragraph 57 in the NPPF. Paragraph 58 in the NPPF states: *where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable.* For a site to be deliverable, contributions required should assure that the development is viable.
73. The site at Churchway is part of a wider recreation area. The remaining area is proposed as Local Green Space in Policy RED8.
74. The NPPF at paragraph 99 explains: *existing open space, sports and recreation buildings and land, including playing fields, should not be built on unless:*
- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
 - b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*

c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

75. Core Strategy Policy CS6 expects new development to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development.
76. The Mid Suffolk Open Space Assessment (2019) indicates that Redgrave is well served in terms of recreational open space. Policy RED2 requires mitigation for the loss of this part of the wider open space in the form of financial contributions towards improving and enhancing overall open space and biodiversity on the remaining area of adjacent open space. Whilst such a contribution is reasonable and necessary due to the loss of an existing part of the wider recreation ground, it is necessary to ensure that the site is deliverable.
77. It is imperative that contributions towards community benefits do not make the development unviable. Otherwise, there may be a risk that the delivery of the housing may not be achieved. As such, reference should be made in Policy RED2 to the level of contribution being subject to viability and deliverability of the development. I have suggested revised wording. This has regard to national policy and is in general conformity with strategic policy.
78. The fourth bullet point regarding financial contributions towards improving and enhancing overall open space and biodiversity on the remaining area of adjacent open space refers to the establishment of a community orchard and wildflower meadow in the south eastern corner of the 'site'. As the financial contributions are towards improving and enhancing overall open space and biodiversity on the remaining area of adjacent open space, it follows that this 'site' is the south eastern corner of the remaining area of open space. In the interest of precision I have suggested revised wording.
79. I now turn to a consideration of the list of detailed proposals for the site. Criterion iv. requires an affordable housing contribution. Policy RED2 states that the site at Churchway is *approximately 1 acre (0.5 hectares)*. However, 1 acre is actually less than 0.5 hectares. This is relevant to the provision of affordable housing as paragraph 64 in the NPPF states that provision of affordable housing should not be sought for residential developments outside designated rural areas that are not major development (defined as 10 or more dwellings or a site area of 0.5 hectares or more). It is not possible for me to accurately measure the size of the site. I sought clarification from the Parish Council as to the actual size of the site and it was confirmed that the site is 0.53 hectares. Therefore, the provision of affordable housing can be sought. In the interest of precision, the size of the site in Policy RED2 should be amended accordingly.
80. Criterion vi. refers to the creation of a 5m landscaping belt between the site and adjacent residential properties to the west. Due to the close proximity of

dwellings that overlook the site, there is a clear justification, in the interest of residential amenity, for the requirement of such a landscaping strip.

81. Criterion ix. refers to avoiding potential harm to the character and appearance of the Conservation Area and nearby listed buildings. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes duties requiring special regard to be had to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses. Therefore, criterion ix. should refer to the settings of the listed buildings. I have suggested revised wording.
82. From my visit to the area and from the background evidence I am satisfied that all other requirements listed in Policy RED2 are reasonable and necessary.
83. Policy RED2 incorrectly cross refers to the site on Map D, which shows all of the sites covered in the AECOM Site Assessment Report. In the interests of precision, I suggest revised cross reference wording.
84. Subject to the above modifications, Policy RED2 has regard to national policy, contributes towards sustainable development, and is in general conformity with strategic policy. Modified Policy RED2 meets the Basic Conditions.
85. **Recommendation: to meet the Basic Conditions, I recommend**

1) modification to the first two paragraphs in Policy RED2 to read as follows:

A site of 0.53 hectares at Churchway is allocated for new housing development of approximately 8 dwellings. The site is indicated on Map E, Map F and the Policies Map.

Mitigation for the loss of existing recreational open space will be required in the form of a financial contribution to improving and enhancing overall open space and biodiversity provision on the remaining area of adjacent open space. The level of financial contribution should be subject to the viability and deliverability of the development and take into account the findings in the Babergh and Mid Suffolk Open Space Assessment 2016-2036 (May 2019).

This should include:

- **Enhancement to existing children's play area.**
- **Enhanced or additional playing pitch provision.**
- **Enhanced youth provision.**
- **Establishment of community orchard and wildflower meadow in south eastern corner of the remaining area of adjacent open space to benefit wildlife and provide informal recreation.**

- **Retention of existing footpath and Rights of Way.**

2) modification to criterion ix) in Policy RED2 to read as follows:

The layout should avoid the potential for harm to the character and appearance of the Conservation Area and harm to the settings of the Listed Buildings along Half Moon Lane, due to loss of some views towards these from Churchway, which allow appreciation of the Listed Buildings' rural backdrop and the one-plot-deep development pattern.

RED3 Housing Type

86. Paragraph 60 in the NPPF states that the needs of groups with specific housing requirements need to be addressed, to support the Government's objective of significantly boosting the supply of homes.
87. Core Strategy Policy CS9 seeks to ensure a mix of housing types, sizes and affordability to cater for different accommodation needs.
88. Policy RED3 seeks a mix of housing in line with the latest evidence of need. This includes the provision of small dwellings. Background evidence justifies the current need for small dwellings.
89. Policy RED3 seeks the provision of affordable housing. As mentioned under Policy RED2, paragraph 64 in the NPPF states that provision of affordable housing should not be sought for residential developments outside designated rural areas that are not major development (defined as 10 or more dwellings or a site area of 0.5 hectares or more). Therefore, Policy RED3 should make this clear.
90. PPG, (at Paragraph: 001 Reference ID: 56-001-20150327), makes it clear through a link to a Written Ministerial Statement of 25 March 2015 that it is not appropriate to refer to any additional local technical standards or requirements relating to the construction or performance of new dwellings in neighbourhood plans. Therefore, reference to M4(2) standards should be deleted from the third paragraph.
91. Subject to the above modifications, Policy RED3 has regard to national policy, contributes towards sustainable development, and is in general conformity with strategic policy. Modified Policy RED3 meets the Basic Conditions.
92. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy RED3 to read as follows:**

Housing Type

Support will be given to the provision of a wide range of types of housing that meet local needs and achieves a better balance of

housing to enable the creation of a mixed, balanced, and inclusive community.

In line with the latest evidence of need, new developments should provide a broad range of homes suitable for first time buyers, families, and older people, where appropriate, and should include:

- **Family housing - 2 & 3 bedrooms.**
- **Low-cost market homes suitable for first time buyers and Shared Ownership- 1-2 bedrooms.**
- **Bungalows and housing for older people.**
- **Affordable Housing.**

Support will be given for smaller 2 and 3 bedroomed homes that are adaptable in order to meet the needs of the ageing population, without excluding the needs of the younger buyers and families.

It should be noted that the above housing types may not be suitably accommodated on every site and an affordable housing contribution can only be required for major development.

RED4 Existing Community Facilities

93. Paragraph 93 in the NPPF states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should, amongst other matters, plan positively for the provision of community facilities and guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.
94. Core Strategy Policy CS6 seeks to ensure that new development provides or supports the delivery of appropriate and accessible infrastructure to meet the justified needs of new development. Whilst not a policy specifically supporting the retention of existing facilities, the supporting text does refer to seeking to ensure the protection of existing facilities and services.
95. The above policies are relevant to Policies RED4 and RED5.
96. Policy RED4 seeks to protect existing community facilities unless convenient improved or equivalent facilities can be provided or where non-viability can be demonstrated. As these facilities are identified on both Map G and the Policies Map, in the interest of precision, Policy RED 4 should cross refer to these maps.
97. Subject to the above modification, Policy RED4 has regard to national policy, contributes towards sustainable development, particularly the social

objective, and is in general conformity with strategic policy. Modified Policy RED4 meets the Basic Conditions.

98. Background evidence in the first sentence in paragraph 2.27 on page 17 states that all facilities should be retained, enhanced and supported. This is not translated into Policy RED4. Therefore, in the interest of precision, that sentence should be deleted.
99. **Recommendation: to meet the Basic Conditions, I recommend:**
- 1) modification to Policy RED4 by the inclusion of cross referencing to Map G and the Policies Map;**
- 2) the deletion of the first sentence in paragraph 2.27.**

RED5 New or Improved Community Facilities

100. Policy RED5 seeks to ensure that there is sufficient supporting infrastructure to meet the needs of new housing development and supports the creation of new facilities including a new village hall.
101. Policy RED5 has regard to national policy, contributes towards sustainable development, particularly the social objective, and is in general conformity with strategic policy. Policy RED5 meets the Basic Conditions.

Built and Natural Environment

RED6 Area of Landscape Sensitivity (ALLS)

102. Paragraph 174 in the NPPF requires the planning system to contribute to and enhance the natural and local environment; including protecting and enhancing valued landscapes.
103. Core Strategy Policy CS5 seeks to protect and conserve landscape quality, taking into account the natural environment and the historic dimension of the landscape as a whole.
104. These policies are relevant to Policies RED6, RED7 and RED8.
105. Policy RED6 seeks to protect an area designated as a Special Landscape Area in the Local Plan (2008). The emerging Joint Local Plan does not propose such a designation. Policy RED6 proposes that this area is designated as an Area of Local Landscape Sensitivity (ALLS). This policy does not prevent development within the defined area, but where development is proposed, it must seek to conserve or enhance the special qualities of the landscape and be sympathetic to the scenic beauty.

106. At my site visit the local importance of the landscape in the designated area was evident. I am satisfied that the definition of this area as an Area of Local Landscape Sensitivity is justified.
107. Policy RED6 has regard to national policy, contributes towards sustainable development, particularly the environmental objective, and is in general conformity with strategic policy. Policy RED6 meets the Basic Conditions.
108. As the designation is for an Area of Local Landscape Sensitivity, Map H should not include 'important' in the title. **I see this as a minor editing matter.**

RED7 Protection of Important Public Local Views

109. Policy RED7 seeks to protect eleven Important Public Local Views. Development within these views should respect and take into account the view concerned. I have visited the viewpoints and understand their importance to the local community. I am satisfied that the protection of the views identified by the local community is justified.
110. Policy RED7 has regard to national policy, contributes towards sustainable development, particularly the environmental objective and is in general conformity with strategic policy. Policy RED7 meets the Basic Conditions.
111. Policy RED7 should refer to Map I, not Map D. The Important Public Local Views should be numbered on the Policies Map Inner to correspond with the numbering in Policy RED7. TBC should be removed from the title. **I see these as minor editing matters.**

RED8 Protection of Local Green Spaces

112. The NPPF in paragraphs 101 - 103 states: *the designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.*
- The Local Green Space designation should only be used where the green space is:*
- 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.

Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

113. Policy RED8 identifies three Local Green Spaces (LGS). The choice of LGS is supported by background evidence in Appendix 3 in the Plan. I have seen the three proposed LGS during my visit to the Parish. My comments on each site are set out below. They all meet the criteria for designation.
114. a) *The Flat iron*. This is a triangular spaced meadow within the village with views from Hall Lane and Half Moon Lane. As such it is in reasonable proximity to the local community. It is demonstrably special to the local community due to its setting and beauty and historical significance as part of a former common. It is local in character and is not an extensive tract of land. I have no evidence to suggest that this designation is not capable of enduring beyond the end of the plan period. The owners of this site have objected to the designation. A site does not have to have public access for it to meet the criteria for designation as a LGS. I note the owners have raised concern that they were not notified of this proposed designation. Whatever the circumstances, they did make comment at an early stage as part of the Regulation 14 consultations. Therefore, I do not consider that they were unduly disadvantaged in this respect.
115. b) *The Knoll*. This is the central green at the heart of the village. As such it is in reasonable proximity to the local community. It is demonstrably special to the local community due to its informal recreation provision and local meeting place. It is local in character and is not an extensive tract of land. I have no evidence to suggest that this designation is not capable of enduring beyond the end of the plan period.
116. c) *The Playingfield*. This is a recreation ground that includes sports fields and children's play equipment. It is in reasonable proximity to the local community. It is demonstrably special to the local community due to its recreation provision. It is local in character and whilst it is a large site it is not an extensive tract of land.
117. I note that the site is privately owned and is leased to the Parish Council. That lease is due to expire in the Autumn of this year. A LGS is required to be capable of enduring beyond the end of the Plan period. Even if the site does revert back to private ownership, this does not prevent it from being capable of enduring beyond the end of the Plan period.
118. Following a recent Court of Appeal case with regard to the lawfulness of a LGS policy in a neighbourhood plan: (*Lochailort Investments Limited v. Mendip District Council and Norton St Philip Parish Council*, [2020] EWCA Civ 1259), I consider it necessary to delete the last paragraph in Policy

RED8 and reference to special protection in the first sentence of the policy. This will ensure that there can be absolutely no doubt regarding the lawfulness of the policy. The restrictions on development with regard to LGS designation will continue to apply through the NPPF. This will ensure that policies for managing development within a LGS are consistent with those for Green Belts. This ensures that the policy meets the Basic Conditions.

119. Subject to the above modifications, Policy RED8 has regard to national policy, contributes towards sustainable development, particularly the environmental objective, and is in general conformity with strategic policy. Modified Policy RED8 meets the Basic Conditions.

120. Paragraph 8.20 refers to the wrong map. **I see this as a minor editing matter.**

121. **Recommendation: to meet the Basic Conditions I recommend modification to Policy RED8 to read as follows:**

Protection of Local Green Spaces

The following areas are designated as Local Green Space (as shown on Map XX and the Policies Map).

a) Land known as ‘The Flat Iron’ between Half Moon Lane and Hall Lane.

b) Land known as ‘The Knoll’ in front of the Cross Keys Public House, Churchway.

c) The Playing Field (including the Children’s Play Area) adjacent to the Redgrave Activities Centre on Churchway.

RED9 Protection of Natural Assets

122. The NPPF, in Paragraph 174, requires the planning system to contribute to and enhance the natural and local environment. This includes protecting and enhancing valued landscapes and minimising impacts on biodiversity and providing net gains in biodiversity.

123. Core Strategy Policy CS5 seeks to protect, manage and enhance local biodiversity.

124. Policy RED9 seeks to protect natural features. New development will be expected to provide a net gain in biodiversity. It recognises the need for mitigation where losses or harm are unavoidable.

125. Suffolk County Council has requested the deletion of ‘and where practical to do so’ from the second paragraph in Policy RED9. In the interest of precision, I concur with this request.

126. Policy RED9 states that where loss or damage is unavoidable, the benefits of the development proposals must be demonstrated to clearly outweigh any impacts. In Paragraph 180 b) in the NPPF, this test is only relevant for development on land within or outside a Site of Special Scientific Interest. I have no evidence before me to indicate why this test should be relevant for all loss or damage to biodiversity features in the Parish. Therefore, I have recommended deletion of this reference.
127. Suffolk Wildlife Trust has requested reference to County Wildlife Sites. Paragraph 8.28 on page 75 refers to the Redgrave Lake County Wildlife Site but this site is not specifically mentioned in Policy RED9. It does refer to designated sites such as County Wildlife sites. In the interest of precision, this should refer to 'locally' designated sites.
128. Policy RED9 recognises the importance of Redgrave and Lopham Fen as a Site of Special Scientific Interest (SSSI), National Nature Reserve (NNR), and part of the Waveney and Little Ouse Valley Fens Special Area of Conservation (SAC).
129. I have a concern with the sub-headings in Policy RED9. By dividing the policy in this way implies that all the second half of the policy is only relevant to Redgrave and Lopham Fen, whereas it is more general than that. In addition, reference to biodiversity in the first sub-heading is also relevant to the second part of the policy. Therefore, in the interest of precision, I recommend the deletion of both sub-headings.
130. Subject to the above modifications, Policy RED 9 has regard to national policy, contributes towards sustainable development, particularly the environmental objective, and is in general conformity with strategic policy. Modified Policy RED9 meets the Basic Conditions.
131. The last sentence in paragraph 8.28 should refer to Policy RED9, not Policy RED8. That said, the sentence is not necessary and can be deleted. **I see this as a minor editing matter.**
132. **Recommendation: to meet the Basic Conditions I recommend:**
- 1) the deletion of both sub-headings in Policy RED9.**
 - 2) the deletion of 'and where practical to do so' in the second paragraph in Policy RED9;**
 - 3) modification to the third paragraph in Policy RED9 to read as follows:**
Where loss or damage is unavoidable, the development shall provide for appropriate replacement planting on site together with a method statement for the ongoing care and maintenance of that planting;
 - 4) modification to the fourth paragraph in Policy RED9 to read as follows:**

Where development proposals cause damage to identified natural features, or locally designated sites such as County Wildlife Sites, wildlife corridors around the interruption will be constructed.

RED10 Protecting Redgrave's Heritage Assets

133. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes duties requiring special regard to be had to the desirability: firstly at Section 16(2), of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses; and secondly, at Section 72(1), of preserving or enhancing the character or appearance of a Conservation Area.
134. The NPPF advises at paragraph 199 that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.
135. Core Strategy Policy CS5 seeks to ensure that all development maintains and enhances the environment, including the historic environment, and retains the local distinctiveness of the area.
136. Policy RED10 seeks to protect and reinforce the established special character of Redgrave Park, the Conservation Area and other heritage assets.
137. In the interest of precision, to conform with terminology for heritage assets, 'historic' assets in the third and last paragraphs should be referred to as 'heritage' assets. Similarly, rather than referring to 'value' in the third paragraph, this should be altered to 'significance'.
138. Subject to the above modifications, Policy RED10 has regard to national policy, contributes towards sustainable development, particularly the environmental objective, and is in general conformity with strategic policy. Modified Policy RED10 meets the Basic Conditions.
139. **Recommendation: to meet the Basic Conditions I recommend modification to Policy RED10 as follows:**

'historic' assets in the third and last paragraphs should be referred to as 'heritage' assets. 'Value' in the third paragraph, should be altered to 'significance'.

RED11 The Design of New Development

140. Paragraph 126 in the NPPF states: *The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and*

helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

141. Paragraph 127 in the NPPF states: *Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.*
142. Core Strategy Policy CS5 seeks to ensure that all development maintains and enhances the environment and retains the local distinctiveness of the area. Core Strategy Focused Review Policy FC1.1 seeks to ensure that proposals for development conserve and enhance the local character of different parts of the district.
143. Policy RED11 is a general design policy that seeks to ensure that the design of all new development reflects local distinctiveness and that new housing development is of a high standard of design.
144. As mentioned under Policy RED3 it is not appropriate to refer to any additional local technical standards or requirements relating to the construction or performance of new dwellings in neighbourhood plans. Therefore, I have suggested revised wording to criterion a) in Policy RED11 and criterion n) should be deleted.
145. Criterion i) refers to 'Secure by Design'. As this is guidance rather than policy, in the interest of precision, criterion i) needs to refer to 'having regard to Secure by Design', rather than being 'consistent with' the guidance. I have suggested revised wording.
146. Criterion j) requires soft well landscaped boundaries with a minimum edge of 5 metres, where adjacent to open countryside or edge of settlement. Whilst I appreciate the need for soft well landscaped boundaries, I have no robust background evidence to justify the five metre requirement. In particular, there is no detailed character appraisal of the Parish to provide the justification required. Therefore, to avoid over prescription that cannot be justified, I recommend deletion of the five metre reference. I have also deleted the first reference to 'soft' in this criterion as an editing matter.
147. In the latest revision of the NPPF paragraph 131 makes it clear that it is the Government's intention that all new streets include trees unless in specific cases there are clear justifiable and compelling reasons why this would be inappropriate. In addition, opportunities should be taken to incorporate trees

elsewhere in developments; appropriate measures should be in place to secure the long-term maintenance of newly-planted trees; and existing trees should be retained where possible. Therefore, to have regard to national policy it is necessary to include such requirements in Policy RED11.

148. Subject to the above modifications, Policy RED11 has regard to national policy, contributes towards sustainable development, particularly the environmental objective, and is in general conformity with strategic policy. Modified Policy RED11 meets the Basic Conditions.

149. **Recommendation: to meet the Basic Conditions I recommend:**

1) modification to criterion a) in Policy RED11 to read as follows:

a) high quality and local materials, such as Suffolk Red brick and Suffolk White Brick.

2) modification to criterion i) in Policy RED11 to read as follows:

i) include built in crime reduction measures, having regard to the guidance in Secure by Design to minimise the likelihood and fear of crime.

3) modification to criterion j) in Policy RED11 to read as follows:

j) include well landscaped soft boundary edges especially where adjacent to open countryside or edge of settlement.

4) the deletion of criterion n) in Policy RED11.

5) The inclusion of new criteria under Landscaping and Environmental Features in Policy RED11 to read as follows:

include tree-lined streets unless in specific cases there are clear justifiable and compelling reasons why this would be inappropriate.

include trees within developments where the opportunity arises.

where development is permitted, conditions will be imposed to secure the long term maintenance of newly-planted trees.

6) modification to criterion l) to read as follows:

retain existing trees, tree belts and hedgerows making a feature of them as part of the development.

RED12 Low Carbon and Future Sustainability

150. Paragraph 152 in the NPPF states: *the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that*

contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

151. Core Strategy Policy CS3 seeks to reduce contributions to climate change.
152. Policy RED12 supports a number of renewable energy measures.
153. As mentioned under Policies RED3 and RED11, PPG, (at Paragraph: 001 Reference ID: 56-001-20150327), makes it clear through a link to a Written Ministerial Statement of 25 March 2015 that it is not appropriate to refer to any additional local technical standards or requirements relating to the construction or performance of new dwellings in neighbourhood plans. Therefore, Policy RED12 can only apply to non - residential development. I suggest that Policy RED12 is modified accordingly.
154. The accompanying text can explain that it is not appropriate to refer to any additional local technical standards or requirements relating to the construction or performance of new dwellings in neighbourhood plans. **I see this as a minor editing matter.**
155. Subject to the above modification, modified Policy RED12 has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Modified Policy RED12 meets the Basic Conditions.
156. The criteria numbering needs to be altered as there are two f) criterion in this policy. **I see this as a minor editing matter.**
157. **Recommendation: to meet the Basic Conditions, I recommend modification to Policy RED12 by the addition of the following sentence at the beginning of the policy:**
- This policy only applies to non - residential development.**

Business and Infrastructure

RED13 New and Existing Business

158. The NPPF supports a prosperous rural economy. Paragraph 84 states:
Planning policies and decisions should enable:
- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses;*

c) sustainable rural tourism and leisure developments which respect the character of the countryside; and

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

159. Core Strategy Policy CS2 restricts development in the countryside and countryside villages to defined categories. These include new-build employment generating proposals where there is a strategic, environmental or operational justification.
160. Core Strategy Focused Review Policy FC 3 directs the majority of new employment to the towns and Key Service Centres. It supports economic development proposals in rural areas that cannot be more sustainably located closer to existing settlements and where the proposal is restricted in size, scale and type appropriate to a rural setting.
161. Policy RED13 seeks to protect existing businesses and support new small scale businesses appropriate to a rural area. Where an existing business is considered to have no reasonable prospect of continued viable use, amongst other matters this needs to be demonstrated with twelve months of marketing.
162. MSDC has commented that Policy LP13 in the emerging Joint Local Plan restricts such marketing to only six months and has suggested that Policy RED13 adopts the same approach. This is not a current strategic policy requirement and has no bearing on whether the Plan meets the Basic Conditions. Therefore, Policy RED13 does not need to be modified in this respect in order to meet the Basic Conditions. The Parish Council has commented that it has no objection to modifying the policy to require a six month marketing period. In these circumstances, I will leave it up to the Parish Council and MSDC to decide if they wish to make such a modification.
163. The Policies Map wrongly identifies Redgrave Business Centre as Redgrave Business Park. This needs to be amended. **I see this as a minor editing matter.**

RED14 Traffic and Highway Safety

164. Section 9 in the NPPF promotes sustainable transport. Paragraph 111 in the NPPF states: *development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*
165. Core Strategy Policy CS6, amongst other matters, seeks to reduce the need to travel and make safer and easier access.

166. Policy RED14 promotes sustainable transport and seeks to ensure highway safety. This has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Policy RED14 meets the Basic Conditions.

RED15 Walking and Cycling

167. Paragraph 106 in the NPPF requires planning policies to *provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans)*.
168. Core Strategy Policy CS6, amongst other matters, states: *The Council will help reduce the need to travel, reduce journey distances and make it safer and easier for people to access jobs, shopping, leisure facilities and services by public transport, walking and cycling.*
169. Policy RED15 seeks to improve levels of walking and cycling and protect and enhance public rights of way. This has regard to national policy, contributes towards sustainable development and is in general conformity with strategic policy. Policy RED15 meets the Basic Conditions.
170. Paragraph 9.20 at the top of page 98 has an extra '4' in the text. There is also a further paragraph 9.20 on the same page. **I see these as minor editing matters.**

RED16 Drainage and Flood risk

171. Paragraph 159 in the NPPF states: *Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.*
172. Paragraph 161 in the NPPF recognises opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding.
173. Core Strategy Policy CS4 seeks to ensure that new development contributes to the delivery of sustainable development and reflects the need to plan for climate change. It supports development proposals that avoid areas of flood risk and seeks sustainable drainage systems where technically feasible.
174. Policy RED16 requires sustainable drainage systems, recognising the use of drainage and water features to provide drainage, wider amenity, recreational and biodiversity benefits. In addition, this policy seeks to ensure that new development mitigates risk of flooding.

175. Policy RED16 has regard to national policy, contributes towards sustainable development, particularly the environmental objective and is in general conformity with strategic policy. Policy RED16 meets the Basic Conditions.

Referendum and the Redgrave Neighbourhood Plan Area

176. I am required to make one of the following recommendations:
- the Plan should proceed to Referendum, on the basis that it meets all legal requirements; or
 - the Plan as modified by my recommendations should proceed to Referendum; or
 - the Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.
177. **I am pleased to recommend that the Redgrave Neighbourhood Plan as modified by my recommendations should proceed to Referendum.**
178. I am required to consider whether or not the Referendum Area should extend beyond the Redgrave Neighbourhood Plan Area. I see no reason to alter or extend the Neighbourhood Plan Area for the purpose of holding a referendum.

Minor Modifications

179. The Plan is a well-written document, which is easy to read. Where I have found errors, I have identified them above. It is not for me to re-write the Plan. If other minor amendments are required as a result of my proposed modifications, I see these as minor editing matters which can be dealt with as minor modifications to the Plan. In particular, the stages of the Plan preparation in the Introduction need updating. Paragraph 10.1 should refer to an end date of 2037. The Glossary includes references that are not included in the Plan and thus these should be deleted. The definition of affordable housing in the Glossary should include all aspects of affordable housing as defined in the Glossary in the NPPF.

Janet Cheesley

Date 2 September 2021

Appendix 1 Background Documents

The background documents include:

The National Planning Policy Framework (The Framework) (2019)
The Planning and Compulsory Purchase Act 2004
The Localism Act (2011)
The Neighbourhood Planning (General) Regulations (2012)
The Neighbourhood Planning (General) (Amendment) Regulations (2015)
The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations (2016)
The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations (2017)
The Neighbourhood Planning Act (2017)
The Planning Practice Guidance (2014)
The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018
The Saved Policies in the Mid Suffolk Local Plan (1998)
The Mid Suffolk Local Plan First Alteration: Affordable Housing (2006)
The Mid Suffolk Core Strategy Development Plan Document (2008)
The Mid Suffolk Core Strategy Focused Review (2012)
Babergh & Mid Suffolk Joint Local Plan: Preferred Options Consultation Document (July 2019)
Mid Suffolk Open Space Assessment (2019)
Joint Babergh and Mid Suffolk District Council Landscape Guidance (August 2015)
Regulation 16 Representations
Further Representations
All Supporting Documentation submitted with the Plan
Examination Correspondence (On the MSDC web site)