

FRESSINGFIELD HOUSING WORK GROUP

RESPONSE TO MSDC JOINT DRAFT LOCAL PLAN

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Fressingfield Housing Working Group (FHWG) was set up in in 2017. It is made up of a cross section of residents who put themselves forward against criteria aimed at achieving as wide a cross section of opinion as possible, such as membership of village societies. Its purpose is to make recommendations on what constitutes sustainable growth for the village.

2012 Requirements - Mid Suffolk District Council (MSDC) Draft Joint Local Plan (DJLP), which was required in the Localism Act 2011, is being started long after the government target date of the beginning of 2017. This has gravely disadvantaged MSDC residents because it has created a planning policy vacuum, which will persist in the forthcoming two years required to make the Plan, making way for opportunistic development. As MSDC cannot show it can meet five year housing supply targets, any housing policies in the 1998 Local Plan will be deemed out of date¹. Listing applicable non-housing policies (e.g. on landscape) would have been helpful.

The document is driven by housing supply needs. Housing is vital. Yet this emphasis misses the importance of retaining Suffolk's character, so that people actually want to live there.

The consultation mapping tool generates a map of Fressingfield which is very hard to comprehend. It reclassifies development sites in the village without explanation. Some are indicated has of development potential but with no explanation of how this was determined. A change is also shown in the settlement boundary, the reason for which is not given. This is not an acceptable way of conducting a public consultation.

1. CONTEXT – Local Plans requires a three-tier framework for decision and plan making:

- **Local Tier**– informed by the needs of local residents, collated in Neighbourhood Development Plans (NDPs), Community Right to Build Orders (CRBOs) and Neighbourhood Development Orders (NDOs), developed and voted on by local residents
- **District Tier**– shaped by evidence and strategy on housing, the economy, infrastructure, services and the environment from across the district and County, as well as from other districts if residents of one district work or use services in another
- **National Tier**– consistent with the government's National Planning and Policy Framework² based on 12 principles of planning, as well as other national legal requirements.

The DJLP does not measure up well against this framework.

1.1 Local - A Democratic deficit - Principle One of the NPPF requires planning to '*be genuinely plan-led, empowering local people to shape their surroundings with succinct local and neighbourhood plans*' Neighbourhood Development Plans (NDPs) have legal status as part of the Local Plan itself, weaving local views into planning decisions. In 2017, the law was strengthened³ requiring authorities to

- take account of NDPs earlier in the process, even before they are fully 'made'.
- explain why, if it approves permission for a development that conflicts with an NDP⁴

The Secretary of State has power to require the County to step in if a planning authority performs poorly on local plan documents despite government funding to assist the process.

There are over 400 neighbourhood plans in force across the country, but only one in Mid Suffolk. The other 119 Mid Suffolk parishes have no voice. An example of how - contrary to the spirit of the Localism Act - this failure has disenfranchised communities is Fressingfield. In 2017 the Parish Council conducted a housing survey which found that 64% of respondents felt the village needed fewer than 50 new houses in the village over the next 10 years with 42% (the

¹ Para 49 NPPF and Suffolk Coastal v. Hopkins Homes Ltd 2017

² [National Planning and Policy Framework 2012](#)

³ Neighbourhood Planning Act 2017

⁴ Housing and Planning Act 2016

largest group) favouring fewer than 10 houses on each site. FHWG canvassed village opinion this year on the following proposition: *'We, the undersigned, support the Parish Council's declared objective of the building of 50 new houses in our village over the next 10 years. However we strongly reject any plans for further, large scale developments beyond the 50 houses (up to 300 are in the pipe-line) including those proposed for Post Mill Lane, Stradbroke Road and John Shepherd Road.* 93.8% (450) supported this with only 6.2% (28) abstaining or opposing.

Despite this evidence of local opinion, Fressingfield has been assessed by MSDC as capable of yielding 270 dwellings in a five year period. The DJLP suggests it could take even more. The village is incorrectly classified as a Core Village because of inaccurate data (paragraph 11.2). Were the village correctly classified as a hinterland village, this disparity between local views and bureaucratic planning theory would be even starker.

Planning decisions are therefore being made in Mid Suffolk without complying with the framework because the local tier is largely non-existent. In a county where more than half of the population live in villages and rural areas,⁵ this failure undermines the Local Plan, and calls into question any decisions made before it is finalised. The delay in producing the Local Plan and the lack of NDPs could expose any planning decisions before 2019 to a legal challenge of prematurity.⁶

Legally,⁷ authorities must offer support for NDPs, CRBOs and NDOs. The fact that only one plan has been completed shows support has been inadequate. Although the DJLP includes better support for NDPs as an objective on p12, there is nothing about how this is to be done

1.1.2 Solutions - To fill the local evidence gap and compensate for the democratic deficit caused by poor delivery on NDPs, other neighbourhood planning tools⁸ which are more focused and take less time need to be employed.

a) A local say in development - [Neighbourhood Development Orders](#)⁹ (NDO) directly grant planning permission for certain specified kinds of developments [e.g housing] within the Neighbourhood Area. Permission could be full, or outline, and could have conditions attached. It could be site specific, or an Order could grant more generalised development right across the Neighbourhood Area. Such Orders can permit housing on allocated sites in a designated neighbourhood area and could be used to protect conservation areas.

b) Affordable housing if, how, where and when communities need it - A [Community Right to Build Order](#) (CRtBO) 'gives communities the ability to build their own housing, shops or community facilities without going through the traditional planning process. It will help communities deliver small-scale projects [e.g affordable housing].'¹⁰ CRtBOs could be used to decide planning on small clusters of infill or affordable housing. Each process is led by the community working with the District Council, with input across the community and verified through a local referendum and external examination to check viability and consistency with a Local Plan.

c) Housing to meet genuine need - A [Local Housing Need Scheme](#) can be devised with Parish Councils to develop affordable housing which can be kept for local people in perpetuity. Schemes are informed by detailed local housing needs surveys. These ask

⁵ DJLP

⁶ <https://www.gov.uk/guidance/determining-a-planning-application>

⁷ [Town and Country Planning Act 1990 as amended Schedule 10 paragraph 3](#)

⁸ https://mycommunity.org.uk/wp-content/uploads/2016/09/NDO-Guide_FINAL_260216.pdf

⁹

<https://planninghelp.cpre.org.uk/planning-explained/neighbourhood-planning/neighbourhood-development-orders>

¹⁰

<https://www.gov.uk/government/publications/youve-got-the-power-a-quick-and-simple-guide-to-community-rights/youve-got-the-power-a-quick-and-simple-guide-to-community-rights>

residents, for example, whether a relative has had to leave the village because of lack of affordable housing. An LHS opened in Southwold in 2016. S106 Agreements can serve the same purpose, but must be based on a Local Housing Need Survey.

d) Messages from communities - Even without NDPs the Local Plan does not start with a blank page. Documents that have captured local issues (such as existing Village Design Statements, Parish Plans and local housing needs surveys) can be incorporated into the DJLP:

MSDC could adopt such ‘messages from communities’ as Supplementary Planning Documents (SPDs), where they are sound. The NPPF states that such documents are *capable of being a material consideration in planning decisions but are not part of the development plan.*¹¹ and permits their use ‘where they can help applicants make successful applications’ For example the Barking-Darmsden Village Design Statement¹¹ was been adopted by MSDC as Supplementary Planning Guidance.

The NPPF requires SPDs to be consistent with Local Plans, to be material considerations. As the DJLP is now being drafted, there is an opportunity to make it consistent with existing SPDs, rather than the other way round.

MSDC should urgently set up a well-resourced, dedicated team to

- a) Audit all parish plans and village design statements and include key themes in the DJLP
- b) Conduct Local Housing Needs Surveys in each Parish to a standard format.
- c) Conduct or update appraisals for each of its 30 conservation areas
- d) Support local communities to develop the three tools for neighbourhood planning

1.2 Missing District and County level Strategic Information – To be effective the Local Plan must bring together three strands: economic, social and environmental.¹² Much of the supporting information is missing from the DJLP or not yet available:

1.2.1 Economic - The Suffolk Growth Strategy¹³ cites tourism as one of the nine key economic sectors, worth over £1.5 billion per year, and it appears first in the DJLP Key Issues list of economic sectors ‘capable of growth’. Yet there is no strategy to for it. Such a tourism strategy should recognise the need to preserve the character of historic rural Suffolk that helped generate tourism in the first place.

1.2.2 Social - The Suffolk Strategic and Infrastructure Framework is not complete and there is no indication of when it will be. The outcome of this document could radically alter the standard of amenity for existing residents, or make existing housing options undeliverable. The Heritage Settlement and Landscape Sensitivity Assessment is also not available to assess the options put forward in the plan for their impact on heritage and landscape.

1.2.3 Environmental - Mid Suffolk’s 30 Conservation areas¹⁴ are not even mentioned in the DJLP. In contrast, South Norfolk District Council has started a programme of conservation area appraisals across the district, each subject to public consultation, which will inform its planning. Conservation areas also contribute to tourism as they preserve historic character.

1.2.4 Cross boundary issues – Cutting across all three themes above are cross boundary issues. This means that the DJLP is based on flawed data, as it takes no account of the cross boundary issues between South Norfolk and Mid Suffolk.

¹¹ <http://www.midsuffolk.gov.uk/assets/Parish-Plans/Barking-Darmsden.pdf>

¹² NPPF

¹³ *Suffolk Growth Strategy* Suffolk County Council updated 2013

¹⁴

<https://data.gov.uk/dataset/mid-suffolk-district-council-conservation-areas/resource/71029a82-368c-4717-ad10-7f8bd49ed882>

Without the above information, the sustainability of proposals cannot be judged. There is a risk of Mid Suffolk deteriorating into a landscape of ex historic villages hemmed in by new developments, congested with traffic, with overloaded amenities and services. Housing targets might be met but communities would be alienated and the district no longer attractive to live in nor capable of attracting tourism, a supposed growth area (Key Issues in the DJLP).

1.3 National Reform - After the consultation on the DJLP was published, government published their own consultation on proposals to alter the way housing need is determined and allocated to neighbourhood communities, which will radically affect how housing need is calculated, as described below

1.4 Accurate data - there are errors and inconsistencies in the audit of facilities used to determine the settlement hierarchy. Errors in the Plan's core data do not inspire confidence. It is important to note that Fressingfield is wrongly classified as a Core Village, as explained in paragraph 11.2 below. Using accurate data would make it a hinterland village.

VISION AND OBJECTIVES

Q1. What do you think the vision should be? It is hard to argue with the vision, mainly because it does not say very much. Phrases like *'Delivery of the right type of homes, of the right tenure in the right place meeting need'* convey little. It would have been more usual to set out a vision that captures the Key Issues identified on pages 9-11, then set objectives to deliver that vision.

Q2. Do you agree with the identified objectives? No. 75% of the Mid Suffolk population live in rural areas which is where 50% of businesses are located¹⁵. It is classified as 'mainly rural' under the government's *Defining Rural Areas*¹⁶ classification. Yet the vision is thin on the issues of rural quality of life and rural growth. The word 'rural' does not even appear in the vision. It reads like a vision written for the 25% who live in towns and cities. To support a prosperous rural economy, the NPPF requires¹⁷ plans to:

- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres*
- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship*

There are no objectives to deliver these aims.

Q3. Are there other objectives which should be added? An objective is needed to direct development to *where it will enhance or maintain the vitality of rural areas*¹⁸, rather than where opportunistic development places it. Drawing on the NPPF principles, further objectives to sustain the economic, social and environmental needs of the area should include

Economic

- a) Nurturing rural communities to maintain their sustainability and contribution to the local economy, whilst protecting them from over development

¹⁵ *Babergh & Mid Suffolk Key Sectors & Market Towns* Oct. 2014 Ingham Pinnock Associates for Babergh & MSDC

¹⁶ *RUCLAD11 Defining Rural Areas* DEFRA 2015

¹⁷ Paragraph 28 NPPF

¹⁸ NPPF para 55

- b) Linking economic growth and climate change to help deliver the Suffolk Growth Strategy's overall aim for a green economy.
- c) Supporting the Strategy's growth priority areas of particular relevance to Mid Suffolk:
 - tourism, responsible for 7% of Mid Suffolk employment¹⁹, and still growing
 - food drink and agriculture responsible for 6% of its employment

Social

- Preserving 'access to a good standard of amenity for all existing and future occupants.'
- Guaranteeing a mix of housing that meets the needs of older people including those not eligible for affordable housing.

Environmental

- a) Protecting the 'intrinsic beauty of the countryside'²⁰ through a scale development which is proportionate to the existing landscape, coherent with settlement patterns, 'sensitive to the defining characteristics of the local area' and 'significantly enhances its immediate setting.'²¹
- b) Preserving heritage including conservation areas
- c) Improving access to sustainable transport

Q4. What should be a priority across the district area? In Mid Suffolk supporting new development by directing it where it is to scale and appropriate for its setting as well as related to employment opportunities (current or feasible) will meet the three strands set down to sustainability in the N PPF of economic, environmental and social sustainability

Q5. What is most important for your town or village? A say for local people in assessing housing need for their neighbourhoods in a robust way, and in deciding how that need can be met in a sustainable way. For this to be meaningful, people must be provided with a detailed explanation of technical terms, including housing types and tenures.

COOPERATION

Q. 5a Do you agree or disagree with the identified key issues for compliance with the Duty-to-Cooperate for the Babergh and Mid Suffolk Joint Local Plan? Disagree. Co-operation is a legal requirement²² and if not fully delivered it is possible that apparent housing need in one area could be met by another, due to patterns of migration and travel, whilst use of services by new or existing residents of one district could overload services such as education and health in another. The consequences of inadequate co-operation are recognised in the government's current public consultation on changing the requirement: 'co-operation is only tested towards the end of the plan-making process at examination, at which point it is too late to remedy any failures, and plans typically have to be withdrawn leading to significant delays in plans being put in place. This can result in an area with no plan in place for longer, leaving it vulnerable to speculative development and failing to provide certainty to neighbouring authorities over the level of need that will be met by the authority.'²³

It is hard to judge the degree of cooperation so far when no detail is given of what it has consisted of.

Q 6. Are there any other key planning issues that need to be considered in accordance with the Duty-to-Cooperate? Though reference is made to cooperation on 'bordering housing and employment' with South Norfolk, it is not clear what this consisted of. The Ipswich and

¹⁹ Babergh & Mid Suffolk Key Sectors & Market Towns Oct. 2014 Ingham Pinnock Ass. for Babergh & MSDC

²⁰ NPPF para 17 principle 5

²¹ NPPF para 55

²² Section 33A of the Planning and Compulsory Purchase Act 2004

²³ *Planning for the Right Homes in the Right Places* Public consultation 14.09.17 DCLG

Waveney Housing Market Areas Strategic Housing Market Areas Assessment (SHMAA)²⁴ commissioned by MSDC to help determine housing need, noted that ‘there are a number of towns on either side of the boundary with Waveney (and Mid Suffolk), notably Diss, Eye, Harleston, Bungay and Beccles, which are likely to generate migration (and commuting) flows.’ Yet it rejected co-operation with South Norfolk.

6a.1 Information from actual residents on how they actually live their lives tells a different story. MSDC’s Functional Clusters document²⁵ produced for the DJLP, is based on surveys from Parish Councils on actual patterns of travel to work and service use. It is therefore more reliable than the number crunching exercise in the SHMAA or the online search used for the facilities audit that determined the Settlement Hierarchy. Cross boundary issues needing cooperation with South Norfolk are:

- **Norwich – South Norfolk** ‘Norwich’s influence extends to encompass the northern half of the District.’
- **Diss – South Norfolk** – ‘Diss plays an important role for Parishes at the northern edge of the District.’
- **Harleston - South Norfolk** - a ‘functional cluster’ covering villages in the north of Mid Suffolk with the South Norfolk towns of Diss and Harleston was also identified.

6a.2 There is further evidence for the need to cooperate with South Norfolk:

- **The DJLP itself** describes the ‘heavy influence’ of Diss and Harleston on the population of the area.
- **Joint Neighbourhood Plan area for South Norfolk and Mid Suffolk** -As recently as August this year MSDC approved an application for a joint neighbourhood plan for Diss with Mid Suffolk villages on the grounds that ‘the surrounding parishes look to Diss for most of their services, shops and traders and for employment and public transport.’

It is irrational for MSDC to recognise evidence of cross boundary issues with South Norfolk and make decisions based on that evidence, yet ignore them in its Local Plan process..

HOUSING AND HOUSING REQUIREMENT

Q7. Do you agree with the proposed approach set out under Option HR1? No

7.1 Government Reform - As this Local Plan will not come to examination before 31st March 2018 the entire methodology for setting OAN is likely to be rendered invalid if government proposals currently out to public consultation²⁶ come into effect. A standard methodology for determining housing need is to be imposed, based on ONS projections adjusted for market signals (house prices and earnings). The government has [estimated](#) that the Mid Suffolk will need 573 new houses per year over the next 10 years under this formula, instead of 452.

Each neighbourhood plan area will be notified of the housing need for their area, calculated as the percentage of the total housing need figure (calculated as above) that the population of the area bears to the total population of the district. Using Fressingfield (which has yet to start its neighbourhood development plan) as an example:

- Mid Suffolk’s population is 99121
- Fressingfield’s population is 1012
- Fressingfield’s population is 1.02% of Mid Suffolk’s population
- 1.02% of government’s proposed annual housing need for Mid Suffolk, is 6 houses
- Over 10 years total new houses in Fressingfield using this formula would be 60.

²⁴ Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Part 1 May 2017 para 3.2

²⁵ MSDC Functional Clusters Report 2017

²⁶ *Planning for the Right Homes in the Right Places* Public consultation 14.09.17 Department of Communities and Local Government

The Table below compares this figure with what would be result from an equitable distribution (i.e. assuming an even spread across the 25 MSDC core villages) of the best and worst case options in the DJLP for Core Villages, of which Fressingfield is supposedly one.

COMPARISON OF NEW HOUSES NEEDED PER YEAR BASED ON GOVERNMENT AND MID SUFFOLK FORMULAS		
	MSDC 'FAIR SHARE'	GOVERNMENT
Mid Suffolk p.a	452	573
Fressingfield Worst case (Core Village Option MHD3*) p.a.	5	6
Fressingfield (Core Village Best Case Option MHD4**) p.a	3	6

* 30% spread evenly across 25 Core villages

**15% spread evenly across 25 Core Villages

These figures for housing need do not take account of housing for which permissions have been granted but not yet implemented.

Fressingfield is currently subject to approved applications for 52 houses and 3 pending applications for 208, a total of 260 in a village with just over 400 houses. This amounts to 52 years' worth of housing under MSDC's worst-case option applied on a fair shares basis, which is supposed to cover 22 years. It gives 43 years' worth of housing under the government formula, which is intended to cover 10 years. Approving such developments would not meet the NPPF principle of directing development '*where it will enhance or maintain the vitality of rural areas*'²⁷.

7.2 Uplift The DJLP does not mention the requirement in the NPPF that where councils have consistently failed to deliver on their five-year housing supply, they must apply a 20% uplift in their OAN.²⁸ MSDC falls into this category. If this uplift has been included, it would be helpful to say so in the interests of transparency. If it has not, the figures are wrong.

7.3 Cross boundary issues -The boundary of the SHMA is wrong for the reasons stated above. This means that the possibility of housing need in the northern part of the district being met by developments in the market towns of Diss or Harleston has not been considered. This is a flawed approach and undermines the OAN and the affordable housing need upon which the options are based.

Q8. When allocating sites what scale of contingency should be applied? It is not necessary to allocate a contingency because MSDC is already required to increase its OAN by 20% as a penalty for failing to meet its housing targets in the last five years. Further contingency on top of this will artificially inflate the OAN and lead to over development.

Q 9. Are there any specific measures that could be included within the Joint Local Plan that would assist with delivery? To comply with principle 1 of the NPPF on empowerment and the requirements of the Localism Act 2011 and the Neighbourhood Planning Act 2017, much more work is needed to create the lowest tier of the decision-making framework on planning, as described in Context section above. This will permit local people to have a real say in proactively shaping their communities, rather than defending themselves against opportunistic inappropriate development.

Q10. What factors or priorities should be set as triggers for reserve sites to come forward? Reserve sites are unnecessary as the OAN is, or should be, already inflated by 20% to reflect MSDC past failures to meet housing targets.

²⁷ NPPF para 55

²⁸ NPPF paragraph 47

SETTLEMENT HIERARCHY

Q.11. Do you agree with the proposed criteria approach to rank settlements in the hierarchy?

No. As these criteria 'set in stone' the locations to which development will be directed they must be fit for purpose and accurately applied.

However, the criteria used are crude, and insufficiently sensitive to capture the constraints on sustainable development in a rural area, providing a false foundation for the settlement hierarchy. Additional criteria are needed to address this. Nor do the criteria address reflect the NPPF or the Key Issues identified in the DJLP itself.

They have also been applied inaccurately and using flawed data.

11.1 Amendments and additions to the criteria – Fressingfield has been wrongly classified as a Core Village so the discussion in this document has related to Core Villages. However, its correct classification would be 'Hinterland Village'. If the classification were correctly applied, the arguments below would be even more compelling as smaller settlements are even more sensitive to overdevelopment.

a) Current and projected demographics – The Neighbourhood Planning Act 2017²⁹ requires planning authorities to address the housing needs for older and disabled people. This cannot be done without using demographics to differentiate settlements with a significant older population in the settlement hierarchy.

b) Local character - The NPPF principle 5 requires account to be taken of '*different roles and character of different areas*' so that regard is taken in planning of '*the intrinsic character and beauty of the countryside*'. Without criteria to determine character, it is impossible to differentiate settlements where character is relevant to development.

- **Rurality** is an important criterion of local character. For example, according to government classification³⁰, Fressingfield is a '*rural village*' surrounded by '*rural hamlets and isolated dwellings*.' The DJLP has included it in its list of so-called Core villages. However, this category includes both rural villages and settlements which the government classifies as '*rural town and fringe*' areas, such as Elmswell, Debenham, Woolpit and Haughley. Criteria which distribute new housing by lumping together such different settlement types, are not sensitive enough to assess character as required by the NPPF.
- **Environment** is one important example of why this makes Core Village criteria are unfit for purpose. The average distance travelled in a year³¹ by those in rural villages is 15% higher than that travelled by those in rural town and fringe areas and 88% of this travel is by car. In rural villages, the average time to travel to 8 key services³² is almost 50% longer than in rural town and fringe areas (31.7 minutes compared to 21.3 minutes)³³. Extra development in rural villages will therefore exacerbate climate change more than development in rural town and fringe areas. Because rural villages and rural town and fringe areas are lumped together as Core Villages in the DJLP, the methodology is too crude to distribute development in an environmentally sustainable way.
- **Landscape** criteria are missing from the criteria, although the NPPF requires that the planning system should '*contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, geological conservation interests and soils*'.³⁴

²⁹ section 8

³⁰ [Rural Urban Classification for Output Areas V2](#) ONS

³¹ *Statistical Digest of Rural England DEFRA August 2017*

³² Employment Centre, Primary school, Secondary school, Further Education, GP, Hospital, Food store, Town Centre

³³ *Statistical Digest of Rural England DEFRA August 2017*

³⁴ NPPF Para 109

MSDC's own 2015 Joint Guidance³⁵ notes: *'The whole of Babergh's and Mid Suffolk's landscape is sensitive to change. Development can cause irreparable change to the character of the landscape. The guidance allocates villages to one of 12 landscape types with recommendations for each. Fressingfield is Plateau Claylands with an 'overall appearance of wide open views with small clusters of hedges, trees and houses.' with 'a scattered historic settlement pattern' which is recommended for preservation. These landscape types should have been included in criteria to differentiate those less sensitive to development.*

- **Historic assets and character** is a 'Key Issue' yet it is absent from the criteria. MSDC has legal duties to
 - have 'special regard' to desirability of preserving a listed building or its setting; and
 - pay 'special attention' to 'the desirability of preserving or enhancing the character or appearance of' a conservation area.³⁶

The criteria do not differentiate settlements with heritage assets in in the hierarchy. Mid Suffolk has a large number of listed buildings, 57 of them in Fressingfield³⁷ alone. Without capturing where these are, MSDC's spatial distribution does not pay 'special attention – or indeed any attention – to the impact of directing development to the setting'³⁸ of such buildings.

The NPPF requires Local Plans to identify *land where development would be inappropriate, for instance because of its environmental or historic significance,*³⁹ Yet there are no criteria to capture this.

There are 31 conservation areas in Mid Suffolk although this fact is not even mentioned in the DJLP. Among the Core Villages are 8 with conservation areas and 16 without, yet they are all lumped together with no 'special regard' to their historic status.

d) Amenity

- **Public Transport** – as well as being inaccurately applied (Fressingfield has been awarded 2 points for a service it does not have), the criterion on *bus stops with peak time services to/from a high order settlement*, is not sufficiently sensitive to capture the impact of development on a settlement. With an aging demographic, (stated as a 'key issue' but ignored in the criteria), people who are not of working age will not travel at peak times. Government data⁴⁰ records *the percentage of households where the nearest bus stop is within 13 minutes' walk and has a service at least once an hour*. This would be a more meaningful criterion to capture the sustainability of development in a settlement.
- **Local traffic network and highways capacity** – the criteria need to capture impact. There is no guarantee that a village will have wide enough roads or enough pavements to take extra development nor that road safety will not be compromised by extra traffic and parking in rural villages and conservation areas without pavements. Lack of pavements may be part of the character of such areas but they may only be viable up to a certain level of traffic

³⁵ Babergh and MSDC *Joint Landscape Guidance* 2015

³⁶ Planning (Listed Buildings and Conservation Areas) Act 1990 sections 66 and 72

³⁷ https://www.britishlistedbuildings.co.uk/england/fressingfield-mid-suffolk-suffolk#.Wft_J3ZpFLN

³⁸ Defined in the NPPF as *'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'*

³⁹ NPPF Para 157

⁴⁰ Ibid

A credible process needs to be used to assess the impact of traffic generated by new development on the existing local and national road networks. A recent Highways Survey in Fressingfield

- focused only on junctions, ignoring the impact on traffic flow and parking
- failed to assess a major route through the conservation area into the village
- failed to assess raised accident risk concluding that as there had not been many accidents in the past there would not be many in the future
- Despite noting '*significant levels of additional pedestrian and vehicular movement*' as a result of development in an area with few pavements, concluded that putting signs up to say there were pedestrians about would be sufficient.
- lack independence as it was conducted by the same consultants who helped produce the planning applications

This meant that it provided a false picture of traffic impact. Without such robust evidence the environmental and amenity impact of traffic cannot be projected.

- **Capacity of services** - The capacity of facilities for expansion, as well as whether they exist or not, is an important criterion for the settlement hierarchy. Without information on capacity for expansion, the existence of certain services is as much an argument for no new development – as they may be at full capacity with existing residents – as it is an argument for it.

A settlement cannot absorb new development if its services are already at breaking point. For example as Suffolk County Council⁴¹ has pointed out, Fressingfield primary school is landlocked so its capacity for expansion may be limited while at its GP surgery 54% of patients are seen later than their appointment time compared to only 31% in Mid Suffolk.⁴²

An accurate baseline audit is needed of such facilities, followed by an accurate audit of their capacity for expansion, to comply with NPPF principles 4 and 12

e) Employment is supposedly measured by the employment criterion of up to 100 jobs, is far too insensitive. This covers employers with 3 employees and those with 99 and therefore is not fit for purpose in determining economic sustainability. An employer with 99 jobs might be out of scale for a rural village.

The existence of employment of a certain size is too crude to assess its impact on the potential for development and viability. Businesses may have a stable workforce and no vacancies, so would not contribute employment to residents of new houses. Survey data from businesses would be more reliable.

f) Brownfield and public land prioritisation is not covered. In the absence of criterion to differentiate settlements with available brownfield sites, MSDC will not be able to comply with principle 8 of the NPPF by prioritising its use for development. This is despite the statement on page 11 that MSDC and Babergh perform poorly on use of brownfield land.

g) Cross boundary issues are missing, despite the assertion to the contrary on page 23. Where residents living outside Mid Suffolk but close to its borders, use facilities in Mid Suffolk settlements, such as health services or schools, the capacity of these services to expand may be minimal. Similarly, where a village with a relatively small population has services such as shops, schools or health services which are used by other Mid Suffolk parishes, these may already be at capacity but this factor will not be captured by the criteria.

11.2 Inaccurate and inconsistent audit data - The audit of data used to populate the criteria and categorise settlements is inaccurate - but even the inaccuracy is inconsistent. One set of

⁴¹ Letter Suffolk County Council June 2017

⁴² National GP Survey

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data is provided for Fressingfield in the source document, the Audit⁴³ and a different set in the Settlement Hierarchy Topic Paper used to construct the settlement hierarchy in the JDLP.

Both contain inaccuracies but it is not clear which has been used. For example

- **Bus service** - Fressingfield does not have a daily peak - time services to and from a higher order settlement, but a bus to Norwich once a week on a Saturday only and a school bus for local children in the term time. Yet it has scored two points for a daily peak time service.
- **Pharmacy** - Fressingfield does not have a pharmacy only a dispensary that is part of the surgery and dispenses medication to the patients of that surgery only. It has no provision or staff qualified to offer healthcare advice. It does not sell over-the-counter medicines. The Audit shows that it does not have this service yet it has scored 2 points for it in the Settlement Hierarchy Topic Paper.⁴⁴

The Table below compares the results for Fressingfield in the Audit itself, the results as presented in the Settlement Hierarchy Topic Paper, and the actual position.

COMPARISON OF FACILITIES BETWEEN THE AUDIT, THE TOPIC PAPER AND REALITY			
Facility	Audit	Topic Paper	Actual
Convenience Store	2	2	2
Public Houses	2	2	2
Bakers/Butchers/Hairdressers/Newsagents/Bank/ATM/Fuel	0	3	0
Pre-school	0	1	1
Primary School	2	2	2
Proximity to a small scale employment site	1	0	0
Village hall	1	1	1
Library	1	1	1
Place of worship	1	1	1
Doctor's surgery	2	2	2
Chemist/Pharmacy	0	2	0
Bus stop (daily peak time service to/from higher order settlement)	0	2	0
Recreational grounds/children's play area	1	1	1
Sports Centre/Leisure Centre	0	1	0
Broadband to 76Mp	2	2	1
Proximity to a Key Service Centre/Core Village (within 2 Km)	1	0	0
TOTALS	16	23	14

(Inconsistencies shown in bold).

As the threshold for categorisation as a Core Village is 18 points, it is clear that the consequences for Fressingfield, and any other settlement subject to similar inaccuracies, are very serious. Fressingfield should be classed as a Hinterland Village not a Core Village. If the village were correctly designated these points would be even more compelling.

SPATIAL DISTRIBUTION

Q.13.Which option(s) for housing spatial distribution do you think is the best?

13.1 Flaws in the settlement hierarchy seriously undermine the spatial distribution. Flaws in the Strategic Housing Market Assessment have already been pointed out. The other key piece of evidence cited for the spatial distribution, Suffolk Joint Strategic Housing Land Availability Assessment (SHLAA)⁴⁵ is also questionable.

⁴³ BDC and MSDC Services and Facilities Audit August 2017

⁴⁴ Topic Paper – Settlement Hierarchy Review August 2017

⁴⁵ [Babergh and Mid Suffolk Joint Strategic Housing Land Availability Assessment](#) (SHLAA) May 2016

- **Community led not market led** - The call for sites reported in the 2016 SHLAA was a market led approach rather than a community led approach. The methodology was not consistent with the first of the 12 NPPF⁴⁶ principles, that people should be ‘empowered to shape their surroundings.’ Communities were not asked to review any responses to the call for sites to see if these were sustainable for development. It was effectively left to the market to decide which sites were possible for development.
- **Inconsistencies** There are also some odd inconsistencies in the SHLAA:
 - Fressingfield is assessed as capable of yielding 270 dwellings in a five year period.
 - In contrast, neighbouring villages then given the same status as Primary Villages have been assessed⁴⁷ as supporting far fewer dwellings in the same five year period: Laxfield – 35 and Hoxne – none.
 - Curiously all six possible sites in Hoxne, totalling 21.3 hectares, were assessed as unsuitable for one reason or another in the SHLAA, including two sites totalling 3.9 hectares capable of producing 90 houses rejected as ‘disproportionate and unsuitable’ for the village. How can 90 houses be disproportionate in one Primary Village but 270 perfectly suitable for another?

Such differing approaches to three villages that were at the time all classed as Primary Villages, are irrational and needs to be explained.

- **Density** is not discussed. The NPPF Principle 47 requires councils to set out their approach to housing density, yet it is not covered at all in the DJLP. The SHLAA applies three different possible levels of density to its allocation of sites – with radically different results. The density of development is critical to character as well as traffic and use of amenities so this is a serious flaw.

13.2 New standard methodology- As this Local Plan will not come to examination before 31st March 2018 the entire methodology for assessing housing need is likely to be rendered invalid if government proposals currently out to public consultation⁴⁸ come into effect. This will also affect the spatial distribution policy. In addition to changing the housing need for MSDC upwards to 573 new houses per year, the government proposes a new approach for areas where local plans are out of date, as in Mid Suffolk, to assist neighbourhood plans, as explained in section on Housing and Housing Requirement above. This will have major implications for spatial distribution as it will effectively map new development to existing distribution, at least before other factors relevant to siting development are taken into account.

13.3 Sustainability - NPPF Principle 11 is clear on locating new development sustainably, - *actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.* Yet the spatial distribution proposed seems to take no account of this.

Q14. Are there other realistic broad distribution options, which should be considered?

14.1 Practice elsewhere - It is useful to compare policy and experience elsewhere on sustainability. Unlike MSDC, Suffolk Coastal’s policy for Key and Local Service Centres (equivalent to Core Villages) recognises the need to

- a) *retain the diverse network of communities, supporting and reinforcing their individual character;*

⁴⁶ NPPF para 17

⁴⁷ Ibid

⁴⁸ *Planning for the Right Homes in the Right Places* Public consultation 14.09.17 DCLG

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(b) permit housing development within defined physical limits or where there is a proven local support in the form of small allocations of a scale appropriate to the size, location and characteristics of the particular community.

MSDC cites no such criteria in its spatial distribution proposals. The outcome of the two approaches is shown in the Table below.

SETTLEMENT TYPE (Suffolk Coastal/MSDC)	PERCENTAGE OF HOUSING PLANNED SUFFOLK COASTAL	PERCENTAGE OF HOUSING PLANNED MSDC OPTIONS			
		Option 1	Option 2	Option 3	Option 4
Major Centres /Ipswich Fringe area	51%	35%	25-30%	20%	20%
Towns/ Urban areas and market towns	19%	30%	25-30%	35%	20%
Key or Local Service Centres/ Core villages	17%	20%	20-25%	30%	15%
Other Villages/ Hinterland villages	<i>'Minimal. No physical limits and very limited development. Small scale developments within or abutting existing villages in accordance with the Community right to Build or in line with village Plans or other clearly locally defined needs with local support. Infill housing to meet agreed and evidenced local need and where there is an aspiration in a parish plan to become a sustainable settlement.</i>	10%	15%	10%	5%
Countryside/ Hamlets & Countryside		5%			
New Settlement		35%			

The DJLP options compare poorly with Suffolk Coastal's proposals overall, but particularly on rural character and local empowerment.

14.2 Cumulative development –development that has already taken place should be considered in the spatial distribution so that the impact of cumulative development is taken into account. The table overleaf shows new residential completions between 2010 and 2015 in a group of villages.

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SAMPLE PARISHES	POPULATION	HOUSEHOLDS	NO. NEW RESIDENTIAL COMPLETIONS 2			
			2010/2011	2011/2012	2012/2013	2013
Ashbocking	356	139	0	0	0	
Bacton	1228	499	0	1	1	
Badwell Ash	770	316	1	1	8	
Botesdale & Rickinghall	2073	923	0	5	1	
Bramford	2303	1070	1	0	3	
Claydon	2197	922	1	0	1	
Coddenham	620	256	0	0	3	
Combs	852	357	1	0	1	
Creeting St Mary	697	290	1	0	1	
Debenham	2210	967	4	4	0	4
Elmswell	3950	1654	14	6	4	4
Fressingfield	1012	444	10	1	10	
Gislingham	1040	424	8	1	2	1
Grt Blakenham	1235	536	23	0	85	3
Haughley	1638	714	3	1	3	
Henley	573	226	0	1	0	
Mendlesham	1407	600	1	0	1	
Norton	1003	383	1	1	8	
Old Newton	1211	512	1	0	1	
Stonham Aspell	601	226	0	0	1	
Stowupland	1988	900	3	2	0	
Stradbroke	1408	622	3	1	4	1
Thurston	3232	1237	3	22	3	
Walsham le Willows	1213	512	23	18	3	
Whitton	168	51	0	0	0	
Woolpit	1995	835	10	10	3	

NB – No data provided for Somersham

In addition to showing the cumulative development, the comparison illustrates just how random and inequitable the approach is:

- Claydon had just 3 new houses over a five year period whilst Fressingfield, which is half the size (922 households compared to 444) had 33 (7% increase)
- parishes of a similar size such as Bacton (499 households) had just 8 new houses in that period (2% increase)

14.3 Flawed Option - Option MHD3 Transport Corridor Focussed distribution is not accurately presented because it introduces a new criterion: being within 2Km of an A road junction or mainline rail station. Yet this fails to recognise that this criterion was not used to define the various settlement types in the Settlement Hierarchy section. This makes the Option meaningless as 30% of new development is proposed for all the Core Villages which will include some settlements which are within 2Km of an A road junction or mainline rail station, and some which are not.

Q 15.If a new settlement was to be planned in the area, where should it be located? A new settlement should be located where it meets access and transport criteria to reduce carbon footprint, makes use of brownfield and low grade agricultural land and is accessible to services and facilities of the right capacity. It should only proceed in an area where a majority of local people support it.

HOUSING TYPES AND AFFORDABLE HOUSING

The evidence cited for this section is the SHMA Parts 1 and 2, which, as stated above is flawed and does not fully comply with the legal requirements in respect of the north of the district. Two other important contextual points are relevant.

Sustainability - To support social and environmental sustainability in rural communities a 'cradle to grave' approach should be taken to planning and housing, through

- a mix of housing types within areas or functional clusters so that residents can move within their areas between housing types as their needs change, but stay in the area
- available and affordable local housing to preserve coherent communities where
 - a) older people are supported by younger family still living nearby, and vice versa
 - b) affordable housing is designed through a CRtBO so local people are driving it.
- preservation of the capacity of vital services such as health services, upon which older people become increasingly dependent, by protecting their catchment areas from over development, locating housing only where there is proven funded extra capacity.

Neighbourhood Planning – given the local sensitivity needed to plan for rural areas sustainably, local data is vital to the effectiveness of the DJLP. As there is only one neighbourhood development plan in Mid Suffolk the different approaches described above in Context section, need to be employed to

- determine need through a Local Housing Needs Survey in each Parish
- decide the best way to meet that need and control it through CRtBOs for affordable housing and NDOs for market housing where possible.

Such an approach would meet the first principle of the NPPF on the '*empowerment of local people to shape their surroundings*'.

Q.16 Should the Joint Local Plan include a requirement for new dwellings to meet the Nationally Described Space Standards? Without a comparison between these standards and those that apply already, this is a difficult question to answer. If application of these standards led to greater density of building, through larger houses and smaller gardens, this would not be acceptable. In the absence of any explanation of the MSDC's approach to density, this is not clear.

16.1 Standards to capture sustainability - A more wide ranging standard would be the Building Research Establishment's Home Quality Mark⁴⁹ which rates design that takes account of local character and has had good local engagement. This standard also awards points for reduced travel to access.

16.2 Application of Optional Building Regulation Requirements - MSDC should exercise its right to impose the optional addition to the Building Regulations MK4(2). This would require all new housing to be designed to meet the needs of '*occupants with differing needs, including some older or disabled people*'. It requires that the houses be built in such a way that they be adapted '*to the changing needs of occupants over time.*'

Requiring this flexibility in new housing would

- comply with Principle 6 of the NPPF by reusing resources
- reduce the need to move with all its attendance costs and disruption for owners.
- help reduce CO2 emissions by reducing the environmental cost of new construction
- avoid built in obsolescence which serves developers' profit need rather than user need
- protect local character by reducing the need for new building in rural communities
- save money for the tax payer by meeting changing needs as people become older by adapting existing housing rather than building new.

16.3 Environmental standards In line with the aspirations in the DJLP to mitigate climate change and meet county targets on carbon emissions, incentives could be applied for new builds to meet Level 5 or 6 of the Sustainable Homes Code, creating a market for sustainable homes.

Q18. What should the Councils' approach to Starter Homes be? The exception process is 'last resort' planning. If Starter Homes are properly planned based on evidence of need, it would not be necessary to make use of rural exception sites. These homes should be located where neighbourhood planning groups or parish councils think they should be, acting through Neighbourhood Development Orders so that they are supported by a referendum. This would permit such homes to be prioritised for local people.

19. Evidence of Local Need - Answers to the questions listed below require evidence and will vary by area. Local Housing Needs Surveys in parishes are needed to provide local evidence.

Q19. Should the Councils be prioritising the provision of any particular types of homes?

Q20. Are there any other types of housing that should be planned for / required?

Q22. In relation to affordable housing, do you consider the requirement should be set at a percentage other than the current 35%? If so, please provide reasons.

Q 24. In relation to affordable housing, should there be any preference for housing to accommodate key workers?

19.1 Key Issues include the growing numbers of older people in Mid Suffolk. A range of tenures is needed to accommodate the different financial circumstances of older people, as well as different or adaptable housing types to meet their housing needs. Subject to local evidence of need these should include affordable housing for purchase or rent, Older People's Shared Ownership, and open market housing. Such a mix of housing and tenure would free up local housing for working age people, responding to evidence of need.

Q 23. To what extent should affordable housing be (or not be) prioritised over provision of other infrastructure where viability is an issue? This question is hard to understand because affordable housing is not sustainable without infrastructure. How could one be prioritised over the other?

⁴⁹ http://www.homequalitymark.com/filelibrary/HQM-Beta--England--2015_SD232_r1.0.pdf

24.1 The Options

Option HM1 is not acceptable as it leaves the mix of housing to the market and the SHMA, which is even more of a weak approach without the 'reality check' of neighbourhood development plans on market driven development.

Option HM2 is preferable, but cannot be delivered without sound local evidence as explained above.

Option HM3 lumps together different types of housing for older people rather than suggesting approaches that work best for each. For example, it may be sensible to locate extra care and residential homes in urban centres as they are employment centres. However sheltered housing often has limited staffing so it is feasible for sheltered housing to be located in villages, sustaining the community by allowing older people to continue to live where they may have grown up, improving options for them to live near their families and reducing the need for either to move to maintain easy contact. This improves community cohesion, contributes to stable village communities and reduces travel. Such a variation on Option HM3 would be more sustainable than what is proposed.

Option AH1 – sound local evidence of need is needed to assess this Option.

Options RE1 and RE2 - Option RE2 (market housing permitted on rural exception sites for affordable housing) would be acceptable in certain limited circumstances if supported by Local Housing Need Surveys and addressed through CRtBOs or NDOs. Community Action Suffolk has suggested such an option for older people currently living in owner occupied family type properties and wishing to remain in the parish for support from family and friends, but unable to find suitable smaller open market properties for downsizing. They suggest a limited number of such homes on a rural exception site could meet this need.

Q 25. If Option RE2 is supported, what maximum percentage of market housing should be acceptable if there is evidence to support the need for affordable housing for older people

To understand the level of need, the proportion of over 65s to parish population should be used to determine the percentage in each parish. If 20% of the parish were over 65, 20% of market housing would be needed on rural exception sites or elsewhere.

RURAL GROWTH AND DEVELOPMENT

26. National Policy is important for answering these questions. All NPPF requirements on rural growth, as well as the general principles quoted in sections above, need to be followed. In addition, the priorities in the government Rural Statement⁵⁰ must be used to test policy:

- Economic Growth
- Rural Engagement
- Quality of Life

26.1 Learning Lessons – the DJLP acknowledges (p.40) that housing has not always turned out as planned:

- *Over recent years, a significant proportion of housing development has come forward in rural towns and villages. This is despite the planned approach to growth which has sought to concentrate the greatest proportion of growth in the main towns.*
- many settlements have already expanded beyond their original settlement boundary, even though such areas were classified as 'open countryside'

A radical change is clearly required.

a) Sustainable housing - To address the failure to direct housing to where is most sustainable, a much more proactive and rigorous approach is needed to neighbourhood planning. It is

⁵⁰ Rural Statement 2012 Department of Communities and Local Government 2012

local people who have the intelligence about what is economically, socially and environmentally sustainable for them. Therefore in the absence of local evidence (whether through neighbourhood planning or Local Housing Needs Surveys), there is no sound evidence and sustainability cannot be judged.

b) Settlement Boundaries

There is a need to clarify:

- where settlement boundaries now lie and why
- what the policy is on permitting development inside and outside such boundaries are.

c) Rural growth as a whole - There is also lack of clarity in the DJLP on policy for development as a whole. The options put forward are vague or relate to small scale developments only. However the criteria set out in Option HG2 Approach to landfill in hamlets, is actually quite appropriate for development as a whole.

There are also inconsistencies as the approach to infill for hamlets in Option HG2 indicates that the *cumulative impact of proposals will be a major consideration*. Yet this must be a consideration for all development, if character is to be preserved and sustainability achieved.

Q26. Which option for the policy approach to rural growth do you think is most appropriate?

In the absence of a density policy, it is difficult to comment on the options. At first sight, Option RG2 seems the most appropriate one to preserve the scale and character of villages whilst meeting housing need based on sound evidence. However, the wording is vague.

- The allocation of sites for ‘*large development*’ is meaningless and depends on context. A large development in a small hamlet could be 5 houses, in a hinterland village 10.
- an option to *review boundaries and set criteria* is too vague to be commented upon
- The option also takes no account of development has already taken place. The table on page 12 shows the variation in new development in a Core Villages between 2010-2015. If a historic or small village has already been subject to significant redevelopment, it is hard to see how any further development can be sustainable because of the destruction of its character and strain on its amenities and infrastructure. This factor is mentioned in Option HG2 but only in relation to hamlets.

Q 27. Are there any other approaches to distributing development in rural areas that we should consider? There some policy elements that are missing or inadequately covered, as set out in the Table below. The right hand column shows the sources from which these elements have been extrapolated. The hamlets infill criteria are included as suitable for all rural areas.

MISSING POLICY ELEMENT	RELEVANT SOURCE
Sustainability Focus significant development where it is or can be made sustainable	NPPF principle 11
Rural Character Preserve the rural character of villages	NPPF Principle 5
Scale Do not permit developments which are out of scale in settlements.	NPPF Paras 59, 157 & 159
Landscape character Avoid ribbon development	Joint Landscape Guidance
Special Landscape Protect Areas of Outstanding Natural Beauty from development	Joint Landscape Guidance
Protecting views	DJLP Option HG2

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Avoid harmful visual intrusion to surrounding landscape by taking account of different landscapes and the views they offer	
Protecting historic settlement patterns Settlements should not be consolidated so that historic dispersed settlement patterns are not lost	Joint Landscape Guidance
Heritage and character Have regard to the impact of development on the character of conservation areas	NPPF 126 and 157 Joint Landscape Guidance
Historic Settings Take into consideration the historic importance of the area in considering development	NPPF 156 Joint Landscape Guidance
Cumulative Development Take account of housing built in last 10 years by settlement, so that erosion of character and capacity of amenities to date is understood	DJLP page 42 Heritage England
Density Set out a clear policy on density, to maintain scale and character and provide certainty on the amount of housing an allocated site takes.	NPPF Para 47
Land of less environmental value Prioritise brownfield land for development over agricultural land	NPPF Principle 8
Climate change Direct new housing to locations where employment is available, reducing travel	NPPF Principle 11 and para 37
Good standard of Amenity Do not permit new developments without funded, proven capacity for expansion. Any expansion must be of the right scale and character	NPPF Principle 4
Traffic Protect villages from excess traffic and congestion caused by overdevelopment	NPPF Para 30
Road Safety The plan should provide for road safety recognising that narrow roads without pavements which may part of historic character	Road Safety Good Practice Guide ⁵¹ Heritage England Advice Note ⁵²
Local evidence Engage local people with all available neighbourhood planning tools and do not permit development without local support	NPPF Principle 1 and Suffolk Coastal Local Plan

Q 28. Do you support the approach proposed for hamlets? If not please explain? No. Apart from the criteria used in the Table above, this is not an attractive option because it does not take account of

- local evidence on housing need and issues
- the availability of infrastructure to go with a development
- the fact that new infrastructure can damage local character much as the new housing itself

⁵¹ Road Safety Audit Guidelines Institute of Highways and Transportation 2008

⁵² *Conservation Area Designation, Appraisal and Management* Historic England Advice Note 1 2011

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The approach suggested from Suffolk Coastal for hamlets and hinterland villages is more appropriate for retaining the character of the district whilst still permitting sustainable development in accordance with NPPF. *'Minimal. No physical limits and very limited development. Small scale developments within or abutting existing villages in accordance with the Community right to Build or in line with village Plans or other clearly locally defined needs with local support. Infill housing to meet agreed and evidenced local need and where there is an aspiration in a parish plan to become a sustainable settlement.'*