

Boxford Neighbourhood Plan
Consultation Statement
January 2022

To accompany the Boxford Neighbourhood Plan Submission
Version

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Chapter 1: Introduction

- 1.1 The Boxford Neighbourhood Development Plan is a community-led document for guiding the future development of the parish. It is the first of its kind for Boxford and a part of the Government's current approach to planning. It has been undertaken with extensive community engagement, consultation and communication.
- 1.2 The Consultation Statement is designed to meet the requirements set out in the Neighbourhood Planning (General) Regulations 2012 for Consultation Statements. This document sets out the consultation process employed in the production of the Boxford Neighbourhood Development Plan. It also demonstrates how the requirements of Regulation 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 have been satisfied.
- 1.3 The Boxford Neighbourhood Plan Steering Group (BNPSG) have endeavoured to ensure that the Neighbourhood Plan reflects the desires of the local community and key stakeholders, which have been engaged with from the outset of developing the Plan.
- 1.4 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning (General) Regulations 2012.
- 1.5 Section 15(2) of Part 5 of the Regulations sets out what a consultation statement should contain:
 - a) Details of the persons and bodies who were consulted about the proposed Joint Neighbourhood Plan.
 - b) Explains how they were consulted.
 - c) Summarises the main issues and concerns that were raised by the persons consulted.
 - d) Describes how these issues and concerns have been considered and where relevant, addressed in the proposed Neighbourhood Plan.
- 1.6 This consultation statement will also demonstrate that the process undertaken to produce the Boxford Neighbourhood Development Plan has complied with Section 14 of the Neighbourhood Planning (General) Regulations 2012. This sets out that before submitting a Neighbourhood Plan to the Local Planning Authority (in this case Babergh District Council) a qualifying body (in this case the Parish Council) must:
 - i. Publicise, in a manner that it is likely to bring it to the attention of people who live or work within Boxford civil parish,
 - ii. Provide details of the proposals within the Neighbourhood Plan.
 - iii. Provide details of where, how and when the proposals within the Plan can be inspected.
 - iv. Set out how representations may be made; and
 - v. Set out the date for when those representations must be received, being not

less than 6 weeks from the date from when the draft proposals are first publicised.

- vi. Consult any consultation body referred to in Para 1 of Schedule 1 whose interests the qualifying body may be affected by the proposals for a Neighbourhood Plan.
- vii Send a copy of the Neighbourhood Plan to the Local Planning Authority.

1.7 Furthermore, the Planning Practice Guidance (PPG) at paragraph 15, requires that the qualifying body should be inclusive and open in the preparation of its Neighbourhood Plan and to ensure that the wider community:

- is kept fully informed of what is being proposed,
- can make their views known throughout the process,
- has opportunities to be actively involved in shaping the emerging Neighbourhood Plan.
- is made aware of how their views have informed the draft Neighbourhood Plan or Order

2. Context for the Boxford Neighbourhood Development Plan

- 2.1 The idea of producing a Neighbourhood Plan for Boxford formally began in July 2018 , when the Parish Council resolved to prepare its own Neighbourhood Plan.
- 2.2 A Group to oversee and guide the Neighbourhood Plan was put in place that consisted of a number of local residents and a parish councillor. The Group was keen to be seen as democratic and open. Following the approval of the Neighbourhood Area, an awareness raising, and initial consultation session was held in the village hall in September 2018.
- 2.4 A key driver for the Neighbourhood Plan was to give residents a voice in the sustainable development of the Parish, by building a Plan that is inclusive, innovative and bespoke to the needs of the parish. The Plan is based on evidence from technical studies and feedback from local people, preserving unique and positive features that residents value. It promotes community cohesion and develops a framework for economic, social, and environmental sustainability.
- 2.5 Communication is dealt with in more detail in **Section 5** of this report.

3. Designation of the Neighbourhood Plan Area

- 3.1 Boxford Parish Council applied to Babergh District Council for the entire parish to be designated a Neighbourhood Plan area on 2nd August 2018. The area designation was approved on 6th August 2018 and covers the entire parish of Boxford. The Boxford NDP Area Designation Application, the Neighbourhood Area Map and Designation Statement can all be found on Babergh District Council's website:

[Boxford Neighbourhood Plan » Babergh Mid Suffolk](#)

- 3.2 The Neighbourhood Plan area application and Map can be found in full at **Appendix A**.
- 3.3 The Neighbourhood Plan Area Decision Notice can be found in full at **Appendix B**.

4. Community Engagement Stages

STAGE1: Decision to proceed with a Neighbourhood Plan and establishment of a Steering Group; (July-September 2018)

- 4.1 The Boxford Neighbourhood Plan Steering Group led on the preparation of the Neighbourhood Plan, and it is hoped that the document reflects the community's vision and aspirations for the future of the parish. In order, to create a Plan that represents the needs and aspirations of residents, the Steering Group have drawn upon a number of sources including evidence gathered through the various stages of plan making, technical reports and the results of stakeholder and community input.
- 4.2 The management of the Neighbourhood Plan process has been undertaken by the Steering Group Members themselves with support from the Parish Council and other local residents as required. The Steering Group have been supported through the process by an independent consultant who was appointed in April 2020.
- 4.3 There is a dedicated Neighbourhood Plan web page which contains details of the progress of the Neighbourhood Plan, explanations of what a Neighbourhood Plan is, together with copies of the technical supporting documents, and copies of the consultation materials used for consultation events. There are also contact details on the website for anyone wishing to receive direct updates on the progress of the Neighbourhood Plan. The Boxford Neighbourhood Plan website has been updated regularly to provide information to residents about the process and as well as advance notice of any consultations or events.

[BOXFORD, SUFFOLK. THE NEIGHBOURHOOD PLAN \(boxfordsuffolk.com\)](http://boxfordsuffolk.com)

- 4.4 Details of all consultation events were also published in the Parish newsletter – the Box River News which is delivered to every household within the parish (and also adjoining parishes). The Box River News is also produced digitally with a full archive of back issues available on the website.

[BOXFORD, SUFFOLK. BOX RIVER NEWS \(boxfordsuffolk.com\).](http://boxfordsuffolk.com)

- 4.5 Posters and flyers were used to publicise events such as the Pre-Submission Consultation Exhibition together with posts on the community Facebook page. Feedback from the consultation events indicated that the Box River News and the flyers were the most effective form of communicating and promoting the Neighbourhood Plan . Regular updates for the Parish Council on Neighbourhood Plan progress was presented at appropriate meetings.

STAGE2: Data collection, parish questionnaire, to establish policy ideas, commissioning of Housing Needs Survey. (February 2019-July 2020 – part during the first COVID-19 lockdown)

- 4.6 A questionnaire was distributed to every household in December 2018, which sought to gain initial feedback from the community of key issue. The results of the questionnaire were collected and analysed in January and February 2019 and published in March

2019. (Appendix X). This was followed by consideration of options for moving the Neighbourhood Plan forward which took place during the Summer of 2019. In December 2019, the terms of reference and the makeup of the Steering Group were refreshed.

- 4.7 Despite the COVID-19 pandemic and associated restrictions, in April 2020, the Steering Group advertised and appointed an independent planning consultant to assist with moving the Plan forward. An application for funding was also made to Locality. Much of the work undertaken at this time was done so virtually using ZOOM and also communicating with the community via the website. A number of socially distanced 'stakeholder' meetings were undertaken by the members of the Steering Group. The Housing Needs Study was commissioned from AECOM via Locality in July 2020.

STAGE3: Development of vision and objectives, establishment of draft policy ideas; Informal on-line consultation on draft policy ideas to check with the community (September 2020 to January 2021 – part during COVID-19 lockdowns)

- 4.8 In September 2020, the Steering Group reviewed all evidence to date. They sought to establish a draft vision, a set of draft objectives that they could then test with members of the Boxford Community. The Steering Group were keen to begin to establish potential ideas for future planning policies but felt that it was important to reinforce to the local community how important the Neighbourhood Plan process can be and what it could or couldn't deliver for Boxford.

- 4.8 The draft vision and objectives were produced and consulted on via the website in November 2020. At the same time the Steering Group undertook survey work to identify non-designated heritage assets and local green spaces. The vision and objectives consultation was followed by a specific consultation on flooding issues which was again conducted via the website and publicised via the Box River News. This in turn was followed by another online consultation to check emerging policy ideas with the community and to develop detail in order to draft the Neighbourhood Plan, which took place between December 2020 and January 2021.

- 4.9 In late Autumn 2020, consultants AECOM were commissioned via Locality to produce Design Code and Design Guidelines for the parish to inform the Neighbourhood Plan and this was completed in March 2021.

- 4.10 The results of the various consultations were analysed and a number of sites for potential development had been put forward by landowners. The Steering Group commissioned AECOM to undertake a Site Options Assessment of the sites to inform the drafting of the Neighbourhood Plan.

STAGE4: Pre-submission consultation on the draft Neighbourhood Plan; (8th July- 13th September 2021)

- 4.11 The Pre-Submission Regulation 14 Consultation was undertaken between 8th July and 13th September 2021) The consultation period was longer than the statutory 6 weeks due to the Covid-19 social distancing restrictions which were still in place during the early part of the consultation, the fact the consultation took place over the summer

months and due to the fact that the revised NPPF was published in July 2021. The consultation was launched with two public 'drop-in style' exhibitions held on the 8th and 9th of July at the Village Hall. Over the two days, 184 local people attended.

- 4.12 The exhibition was published via the Box River News, posters placed around the parish, posts on the community Facebook page and through a flyer delivered to every household. Electronic copies of the Draft Neighbourhood Plan, the response form and the supporting documents were available on the website. Hard copies of the Plan, the form and the supporting documents were available to view at the Post Office.

[BOXFORD, SUFFOLK. THE NEIGHBOURHOOD PLAN \(boxfordsuffolk.com\)](http://boxfordsuffolk.com)

- 4.13. A copy was also sent to Babergh District Council who included details of the consultation on their Neighbourhood Plan website.

[Boxford Neighbourhood Plan » Babergh Mid Suffolk](#)

- 4.14 Notifications of the consultation and details of how to view the draft plan and submit and return comments were sent to a wide range of consultees. (**Appendix F**) The list of consultees is shown at **Appendix G**).

- 4.15 Following the closing date of the Pre-Submission Consultation, 25 responses had been received from members of the public and 3 from local landowners or their agents. In addition, responses had also been received from the following consultees:

- Babergh District Council
- National Grid
- Environment Agency
- Suffolk County Council

- 4.16 All responses were acknowledged, and respondents informed that their comments would be considered in due course. The Steering Group considered all responses received at their meetings in September and October and each separate comment received consideration. The response table for Community Responses is at **Appendix I** and the response table for statutory consultees and landowners is at **Appendix J**. Each individual comment has been logged and assessed. The table shows each individual comment made together with the response of the Steering Group and any proposed changes to the Plan.

Summary of key issues raised.

- 4.17 The key issues raised during the REG14 consultation exercise can be summarised as:

- General support for the plan
- Proposed Housing Allocation at Stone Street Road– Comments in support and against.
- Promotion of other sites by various landowners/agents

- Clarity around existing planning permissions
- New % for First Homes requirement as set out by Government
- Need for updating to reflect the newly published NPPF
- Concern that development was being sought by a landowner at Calais Street
- Support for the environmental and heritage policies
- Concerns over the current parking and traffic issues at the primary school
- Concerns over traffic issues in Swan Street
- Suggestions for strengthening of policies and clarity around wording.
- Comments in respect of clarity of maps and photographs
- Requests for minor amendments to policies to aid clarity.

4.18 Following consideration of these representations the following key changes were made to the NDP policies:

- Factual updates and correction of errors
- Minor amendments to wording of Objective 7 to refer to natural assets
- Addition of information relating to existing planning permissions
- Amendment to BOX1 to include criterion relating to school capacity.
- Amendments to BOX2 and supporting text to better reflect Government requirements and the Housing Needs Assessment.
- Additional text in transport section and a new Appendix A, to reflect the latest traffic survey.
- Addition of highway criteria to BOX6
- Addition of new text in Chapter 12 referring to the Boxford Water Recycling Centre
- Changes to supporting text throughout the plan.
- Amendments to mapping.
- Factual updates following publication of latest version of the NPPF in July 2021.

STAGE5: Regulation16 – Submission

4.19 Following consideration of the revised Neighbourhood Plan documents at the Steering Group meeting of XX and approval by Boxford Parish Council on 25th January 2022, the Neighbourhood Plan and its supporting documents were submitted to Babergh District Council.

4.43 The documents together with this Consultation Statement and the Basic Conditions Statement can be viewed at:

[BOXFORD, SUFFOLK. THE NEIGHBOURHOOD PLAN \(boxfordsuffolk.com\)](http://boxfordsuffolk.com)

and on Babergh's Neighbourhood Plan pages of their website:

[Boxford Neighbourhood Plan » Babergh Mid Suffolk](#)

5. Communication Approach

- 5.1 Good communication is key to the local community feeling included and informed about the progress and content of the Boxford Neighbourhood Plan.
- 5.2 Essential to this was the Neighbourhood Plan website. [BOXFORD, SUFFOLK. THE NEIGHBOURHOOD PLAN \(boxfordsuffolk.com\)](https://www.boxfordsuffolk.com). The website was updated regularly during the production of the Neighbourhood Plan and new information included to publicise upcoming consultations including all consultation material, Neighbourhood Plan documents and contact details.
- 5.3 To spread news of the emerging Neighbourhood Plan, the Steering Group used:
 - Neighbourhood Plan website
 - Regular articles in the Box River News (see selection shown below)
 - Flyers delivered around the parish delivered by Steering Group Members
 - Event posters which went up throughout the Parish
 - Regular updates on the community Facebook Page

Box River News
Boxford • Edwardstone • Groton • Little Waldingfield • Newton Green

Boxford Needs a Neighbourhood Plan.

WHAT DO YOU KNOW ABOUT FLOODING IN BOXFORD?

BOXFORD NEIGHBOURHOOD PLAN EXHIBITION
Thursday 8th July 2pm - 8pm
Friday 9th July 9am - 5pm
Boxford Village Hall

Drop-in Exhibition to view the draft Neighbourhood Plan
Village Hall, Boxford
Thursday 8th July: 2pm to 8pm
Friday 9th July: 9am to 5pm

Box River News

Boxford • Edwardstone • Groton • Little Waldingfield • Newton Green



GATESBY ESTATES PLANNING APPLICATION

As I am sure you all know by now but on 17th June 2020, Babergh's Planning Committee approved Outline Planning Permission for 64 houses on Sand Hill. Andrew Good, on behalf of the Boxford Society, Roger Linton, on behalf of the Parish Council and Bryn Haines our District Councillor put up a valiant fight against this proposal – quite difficult in the 3 minutes allocated to them. However, various factors worked against them. The meeting was a virtual one with everyone in their own bubble. This led to a rather fractured meeting as everyone wielded with the technology and this format did not lead to any meaningful discussion of the application itself. Most of the Committee seemed reluctant to approve – in fact no-one was even prepared to second the motion so the Chairman had to do this – they were perhaps fearful of the repercussions of rejection as Babergh has recently had to pay for two successful planning appeals that went against them.

The significant objection by Babergh's own Policy Planning Officer, which was included in the report, had obviously not been read by any of the Committee and when the Case Officer was asked to comment replied that 'policy matters are a matter of balance' and no further discussion ensued. Some of the Councillors appeared ignorant of the implications of the application and one suggested that the new Community Centre could be used as a Nursery freeing up space at the School. What new Community Centre? Gatesby Estates have merely offered land on the site with no funding for building or maintaining such a Centre and as we have said before, we don't need another Community Centre as we already have an excellent Village Hall, a Sports Pavilion and The Spinney.

We are in a Climate Change Emergency, Planning Committees should not be approving unsustainable developments like this which will potentially lead to 200 more cars in the Village. Just think of the pollution this will cause, not to mention all the traffic conflicts.

Catesby will now sell the site to a developer who will undertake the building of this estate, probably starting within 18 months. We will have to wait and see what amendments they wish to make to this Outline Planning Approval in order to maximise their profit - we can expect major changes.

So, despite vociferous objection at the original consultation meeting, a petition, many written objections, opposition from the Boxford Society, the Neighbourhood Plan Group and the Parish Council, Outline Planning Permission was approved. This is so wrong. On behalf of the Boxford Society, I will be writing to the Secretary of State for Housing, Communities and Local Government requesting a most and thorough review of Planning Legislation. I know it won't change this decision, but I think we should let him know how outraged we feel that our views were able to be completely ignored. This situation has highlighted the importance of getting our Neighbourhood Plan in place which would give the Village a voice in future applications. Hopefully our actions will prevent other villages being subjected to the same treatment.

Jen Eastwood, Chairman of The Boxford Society

BOXFORD NEIGHBOURHOOD PLAN

The dismay at the outcome of the Catesby Estates Planning Application, expressed by the Boxford Society, is certainly shared by those working to produce Boxford's Neighbourhood Plan. This work has inevitably been slowed but far from halted by Covid-19 restrictions. We had planned to present ideas for sustaining our village by smaller housing developments, designed to fulfil local requirements and to be agreed at public meetings and eventually by a referendum vote.

Whether or not the 64 dwelling development comes to pass, we remain determined to proceed with producing the Neighbourhood Plan and to take our village with us in earmarking suitable locations for appropriate market and affordable housing and other development while looking after our facilities and infrastructure and laying down community led and agreed markers for the future. It will not belong to individuals, interest groups, planners or developers, it will be the village's plan belonging to all. We will not be at all averse to new housing providing it benefits the village in its variety, some low cost and affordable, some catering for first-time buyers and some to allow up and down-zoning for young and old alike.

We already have an excellent history of the Village, a vision for the future which will very possibly need some adjustment before seeking public approval and we are being guided by an experienced professional consultant, Andrea Long, who we look forward to introducing to the village when circumstances permit. Of course our plan is not just about housing. It must cover Boxford, past, present and most importantly, the future of its infrastructure, facilities, utilities, health and education, roads, parking, transport, green spaces, pollution and, importantly, the public buildings including the church and our irreplaceable commercial outlets, the shops and pubs. Our children deserve a strong and safe environment and the plan must play a small but vital part in providing a thriving community.

The last few months have proved the resilience of Boxford and its residents. The Neighbourhood Plan should belong to its residents and help ensure the future; if current planning disappointments come to fruition (by no means certain), we must make a virtue out of necessity and have our own aspirations properly presented to decision makers. The completed Neighbourhood Plan will achieve this aim and have considerable strength in preventing the granting of planning approval for any further unwanted development in the village.

David Burden Hugh Phillips
Co-Chairmen Boxford Neighbourhood Plan

Box River News
Rita Keach, Kim Corpe, Stone Street, Boxford CO10 5NR
Telephone: 01787 211507 e-mail:
ed.keach@btinternet.com
Final date for reserved copy for the
September 2020 issue is:
August 15th at noon

BOXFORD- WHY A NEIGHBOURHOOD PLAN ?

Those of us privileged to live here today in this ancient and unique place are but fleeting mortals. We have a duty to secure this wonderful heritage and pass it to future generations with a plan for its further evolution and 'measurable growth'. (from the early draft of our Plan)

The lack of a formal and agreed Boxford plan has limited our ability as villagers to influence major planning decisions on major housing developments, despite strong and informed expressions made to Babergh planners by committed groups and individuals. As a result of their most recent decision, 64 dwellings are to be built at the top of Sand Hill. We need an agreed Neighbourhood Plan within the next two years if we are to influence further housing development approvals and to shape what our village and its surroundings look and feel like in future years.

A group of us have been working to produce an early draft of such a Plan and we want to share our thoughts with you and get your ideas at this early stage in its development. It is vital that as many villagers as possible contribute so that we get the best possible Plan and one that you approve of.

The work has already begun, led by a small volunteer steering group. Research, evidence gathering and drafting is already underway with the help of a wider group of individuals and you are welcome to join us. We will be consulting a wide range of people as we proceed and your ideas will make the Plan better. At the end we must gain the approval of a majority of the village if the Plan is to be accepted by Babergh. For each a plan must belong to all of us, young and old alike and crucially, while respecting the unique past and present of the village, chart a hopeful future as a much loved home for all ages.

One of Boxford's strong features is that it never stood still, despite periods of history when its outward and physical characteristics changed little. Growth and change are largely why it didn't become one of those rural villages that have become largely derelict. Sadly there are many in East Angles without a school, shop or a Post Office, a pub or sports facilities but with a dilapidated church and a graveyard and nearby residential houses from which residents emerge in the morning in their cars to make the journey to other towns or the motorway. Commuters do not all rely in Boxford of course but they are followed by schoolchildren on assembly, their parents chatting at the school gate, shops opening and on motorway busy traffic of vehicles and people throughout the day and into the evening.

The ancient fabric of Boxford which estate agents call "desirable" must be maintained, but its real durability is its continued vibrancy. This is expressed through its social life, school, shops, cafe, pub, clubs and societies, sport, church, and the diversity of its local housing common ties and traditions.

Controlled growth, allied to sensitive preservation influences by the views of residents in a Neighbourhood Plan, can ensure a village that retains its precise characteristics while contributing to a future for all. All the more reason now to strengthen the village's hand in future development and to ensure:

- A Boxford specific context helps to inform Babergh's planning decisions.
- Our own housing needs are addressed by giving Boxford a say in where and what any new housing should look like, who it should be for.
- Existing village amenities and services remain and flourish and that such community funds as may be made available for those amenities are used to Boxford's benefit.

- Boxford protects what it values today and wants its children and grandchildren to have the chance to enjoy.
- Boxford presents itself as forward looking and willing to take its share of appropriate future housing consistent with its classification as a "vibrant village". This should avoid undue expansion and enable all to join and move up and down the housing ladder.

Boxford needs a Neighbourhood Plan to both preserve its heritage and support its evolution for future generations. The alternative is that we do nothing and allow developers, those that determine planning applications on our behalf and a future rationally directed planning system to decide our fate.

The Boxford Neighbourhood Plan Steering Group, already hard at work on major elements of the plan, is David Burden (Co-Chairman), Hugh Phillips (Co-Chairman), Andrea Good and Roger Linton. They are being advised by Andrea Long, a professional consultant. Good progress is being made despite lockdown and it was planned to have a "walk in" meeting in the village in late October. Such a meeting has been prevented by recent announcements on group gatherings but it is hoped to hear the village regularly updated and invite views at every opportunity. A visual display for small numbers at a time will be staged and the Bill will regularly include information and invite comment. Participation, comment and input is essential by email or social media and the notice will also be in the Facebook page Boxford Neighbourhood.

Steering Group contact details are: boxfordnp@gmail.com HAVE YOUR SAY

STARTER

MAIN DISH

Starter are to be served with the main dish. Please state your choice.

6. Conclusion

- 6.1 The programme of community engagement and communications carried out during the production of the Boxford Neighbourhood Plan was extensive and varied. This was despite the fact that much of the policy development work was undertaken during the COVID-19 pandemic and associated lockdowns and social distancing regulations, which made face to face consultation difficult. Despite this the efforts of the Steering Group ensured that the emerging Neighbourhood Plan reached a wide range of the local population and provided opportunities for many parts of the local community to input and comment on the emerging policies. This is evidenced by the high turn-out at the drop-in events and the number of responses from local people to the Regulation 14 Consultation.
- 6.2 The comments received throughout and specifically in response to the consultation on the REG 14 Pre-Submission draft of the Boxford Neighbourhood Development Plan have been addressed, in so far as they are practical, and in conformity with the National Planning Policy Framework and the policies in the development plan for Babergh and the emerging Babergh-Mid Suffolk Joint Local Plan.

APPENDICES

Appendices:

Appendix A: Neighbourhood Plan Area Notice and Map



NEIGHBOURHOOD PLAN AREA DESIGNATION NOTICE BOXFORD NEIGHBOURHOOD PLAN

Babergh District Council received an application from Boxford Parish Council (the 'Relevant Body') to designate the whole of the parish as a Neighbourhood Plan Area on the 2 August 2018.

The application was made under Regulation 5 of the Neighbourhood Planning (General) Regulations 2012 (as amended). A copy of the application and a map which identifies the area to which this relates can be found on the District Council website at:

<https://www.babergh.gov.uk/BoxfordNP>

Regulation 5A states that ... "where (1)(a) a local planning authority receives an area application from a parish council" and (1)(b) the area specified in the application consists of the whole of the parish council's area, (2) the local planning authority must exercise their powers under section 61G of the Town and Country Planning Act 1990 to designate the specified area as a neighbourhood area."

Regulations 6 and 6A relating to publicising an area application do not apply in this instance. Therefore, in accordance with Regulation 5A (2) and 7 (1) of the Neighbourhood Planning (General) Regulations 2012 (as amended) Babergh District Council hereby give notice that it has designated the parish of Boxford as a Neighbourhood Area in order to facilitate the preparation of a Neighbourhood Plan by Boxford Parish Council.

Tom Barker

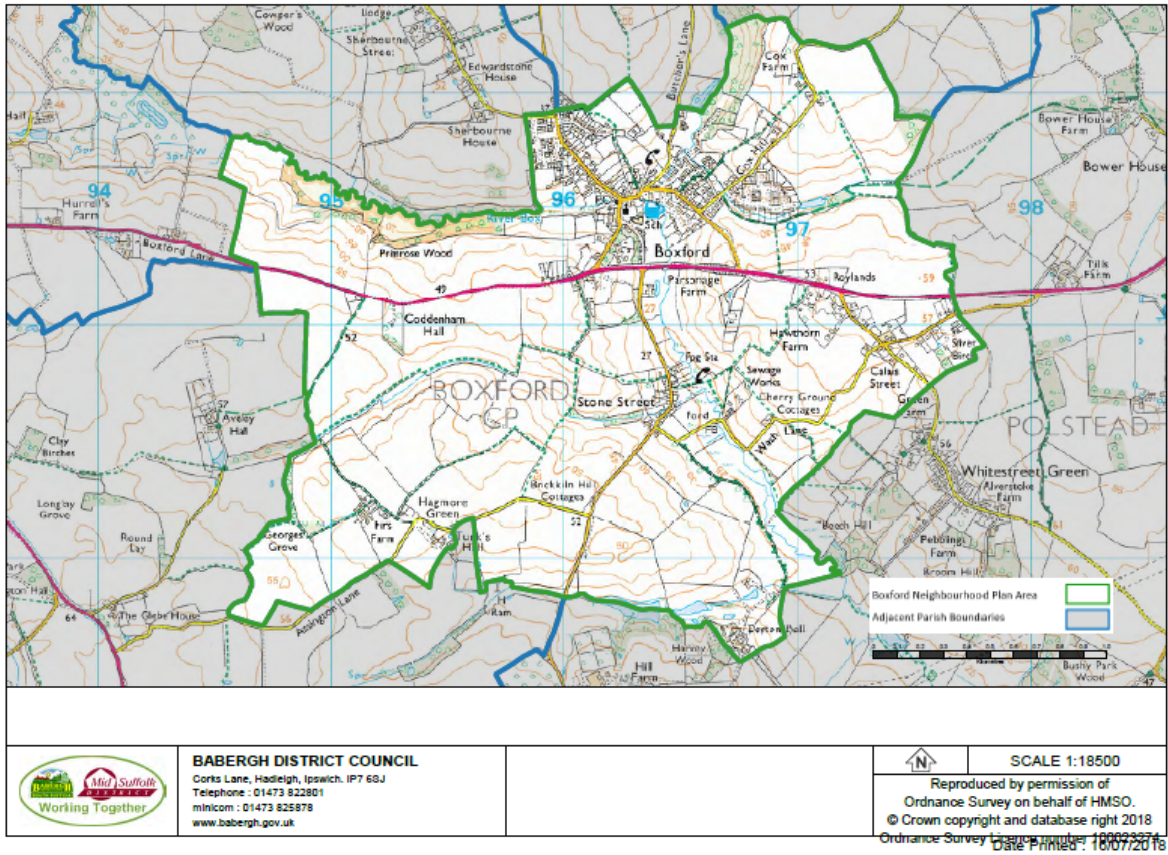
Assistant Director - Planning for Growth
Babergh and Mid Suffolk District Council

Dated: 6 August 2018

Babergh District Council
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
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Boxford Neighbourhood Plan Consultation Statement January 2022



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 www.babergh.gov.uk

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Appendix B: Neighbourhood Plan Steering Group

Steering Group Members

David Burden (co-chair), local resident

Andrew Good, local resident

Roger Loose, local resident

Hugh Phillips, (co-chair) local resident

Supported by Andrea Long, Compasspoint Planning & Rural Consultants

Thanks also go to the following:

Evan Flockhart

Vince Strafford

Trudi Wild

Matthew Wooderson



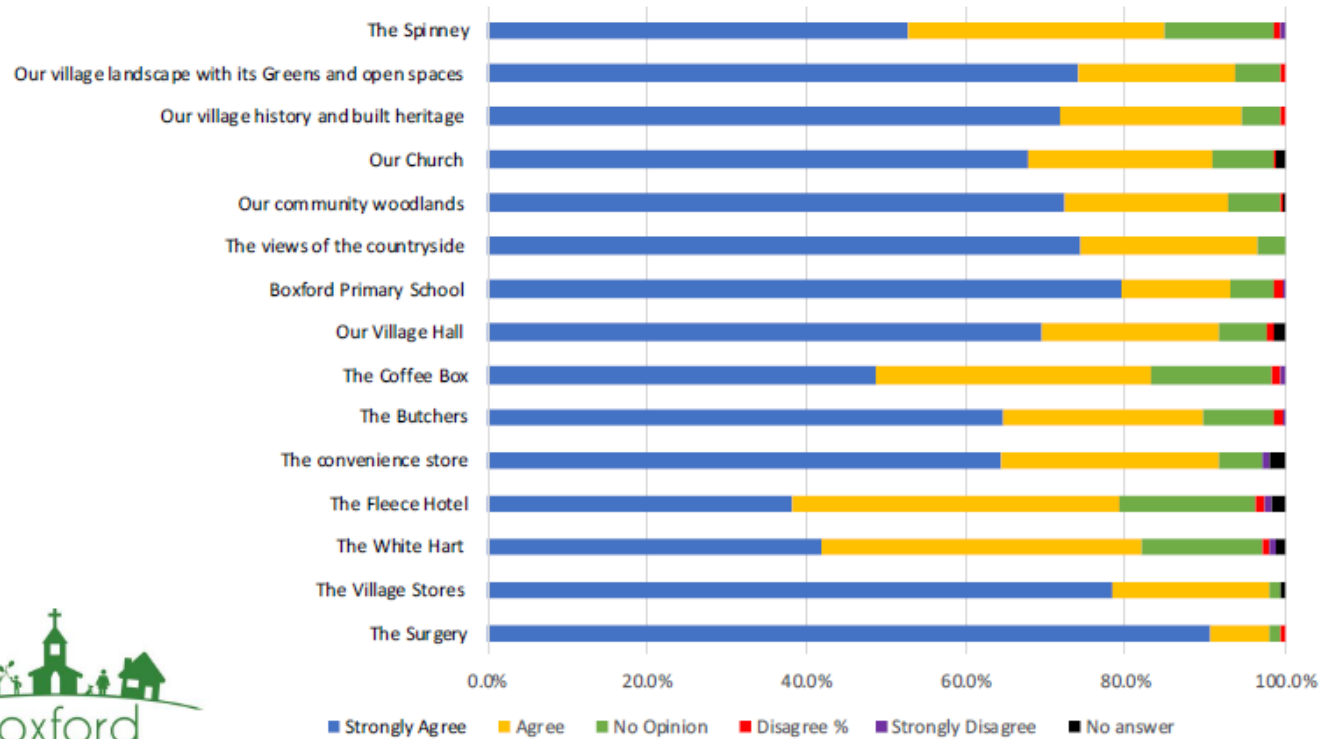
Boxford Neighbourhood Plan Questionnaire Results

February 2019



What do you value most in the village?

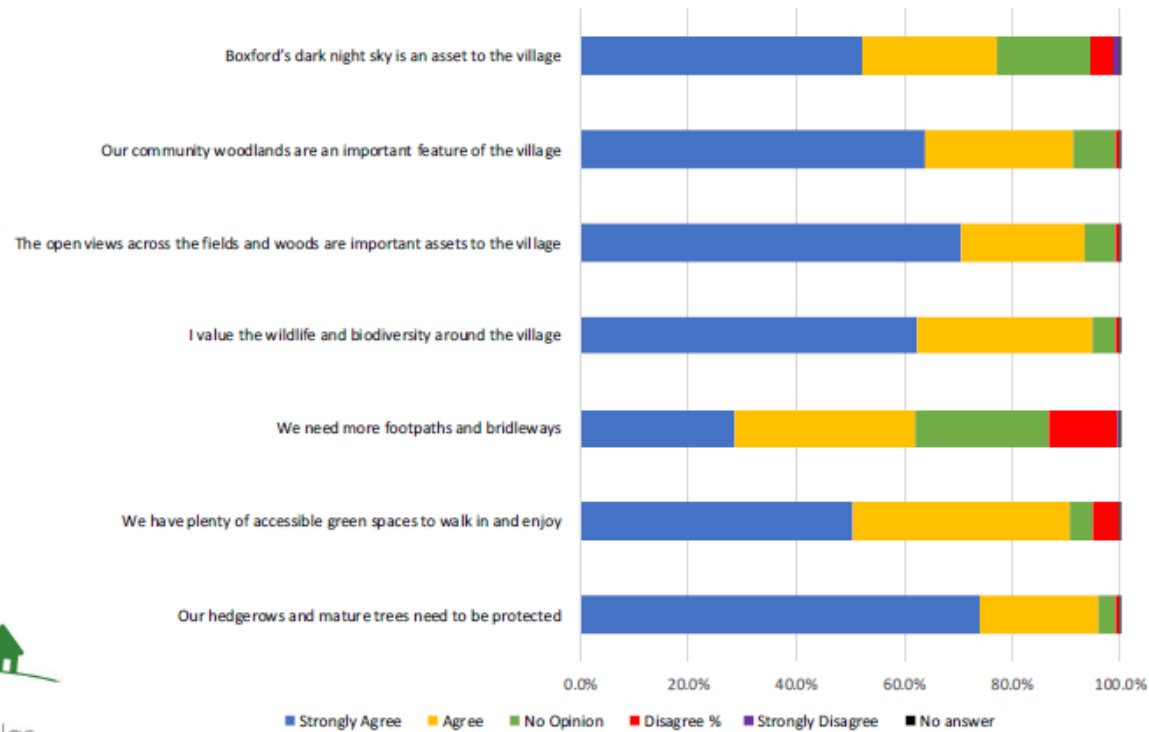
All amenities are valued and important to the community, with 97.9% saying that they valued the Doctors Surgery and Village Stores.



* majority is the combined results for strongly agree and agree

Views on the environment and green spaces

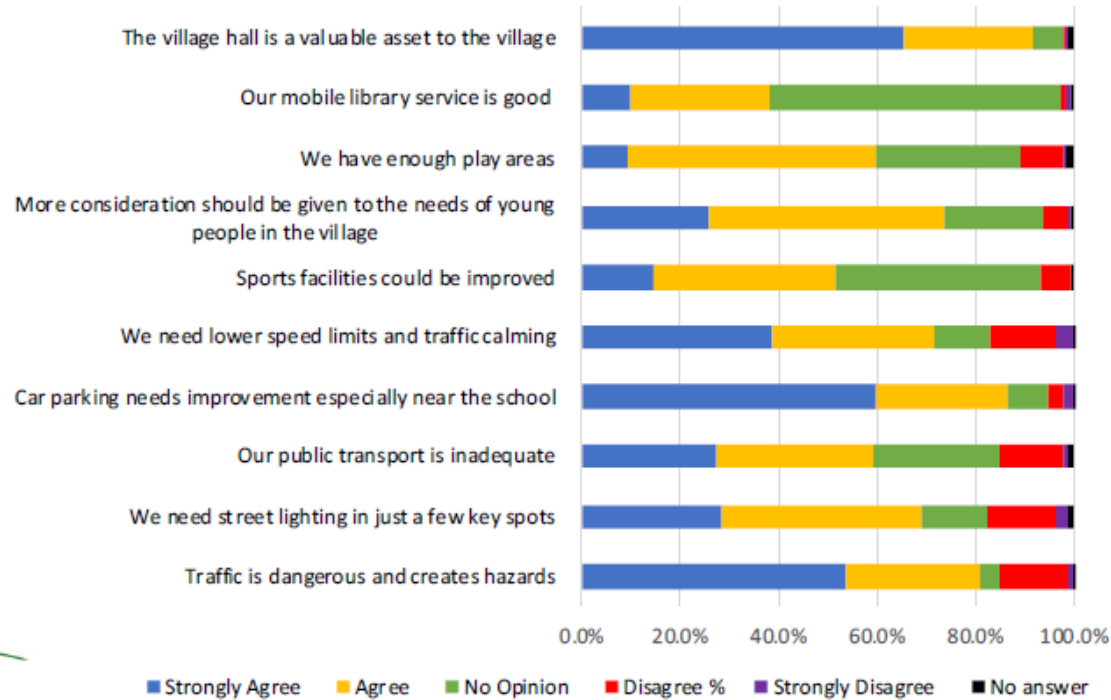
Our green spaces and the natural environment is a vital part of our village, with the majority agreeing that our woodlands, views, wildlife and accessible green spaces are all important. In addition, 96%* said that our hedgerows and mature trees need to be protected.



* majority is the combined results for strongly agree and agree

Views on services and amenities

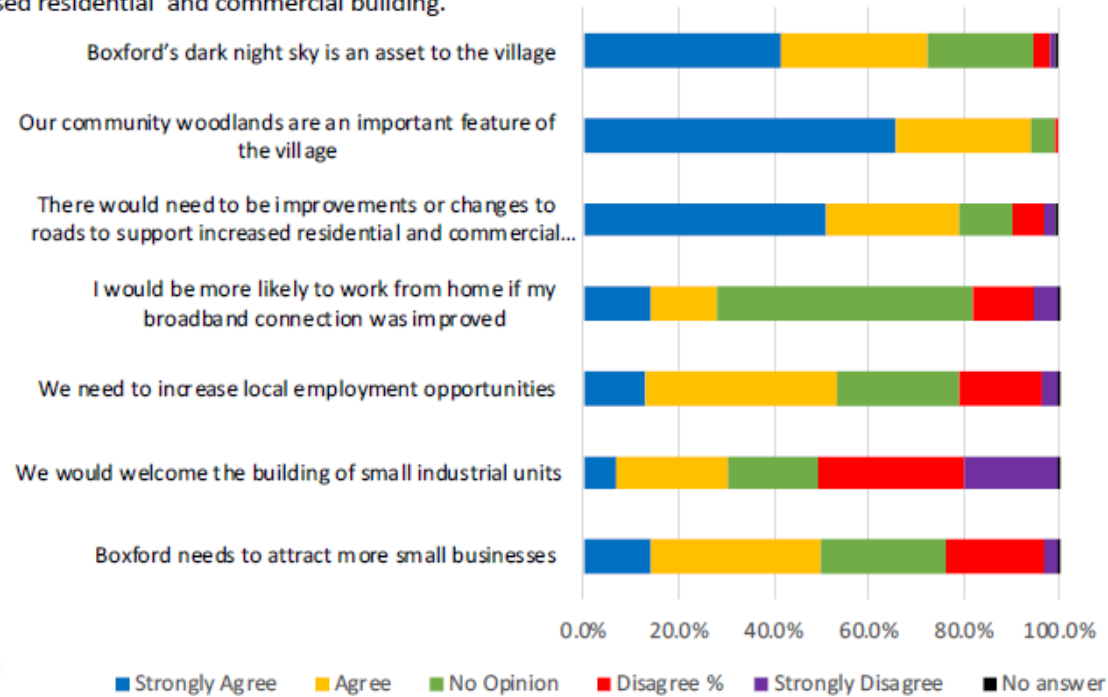
Over 90% of respondents said they valued the village hall. In addition, 80.7% felt traffic is dangerous and creates hazard, with 86.7% saying that car parking needs improvement, especially near the school.



* majority is the combined results for strongly agree and agree

Views on communication and business opportunities

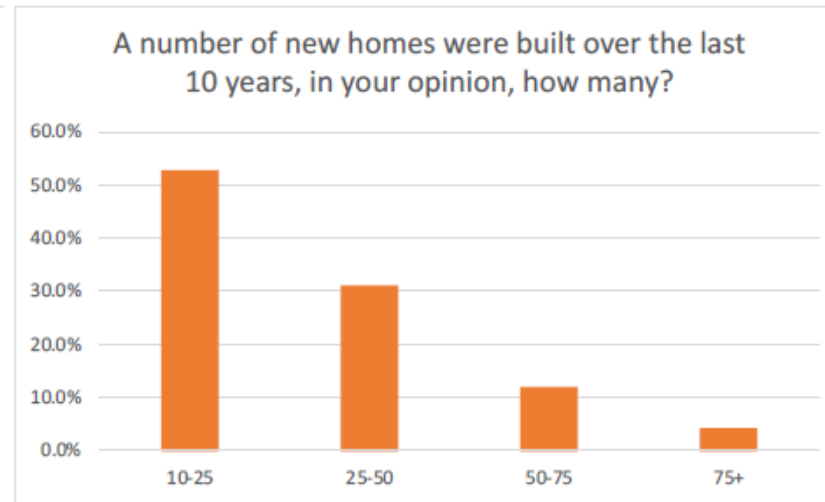
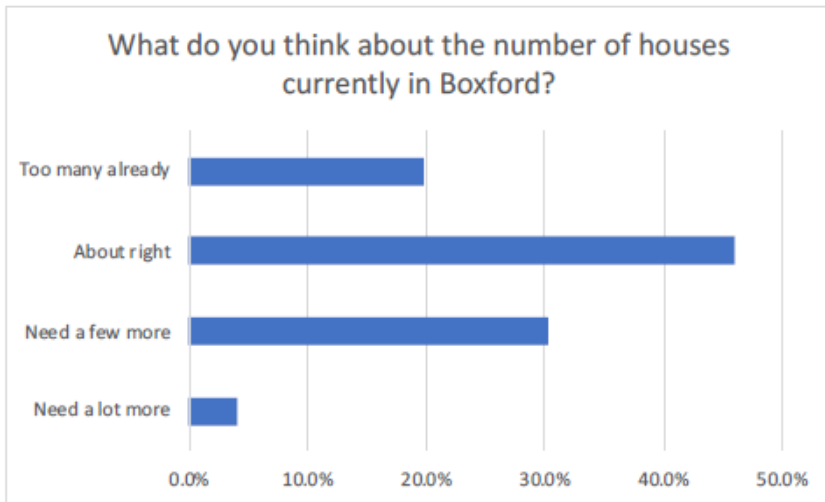
Of the 426 responses, 33 run a business in the village, employing a total of 61 employees. Building small industrial units is not well-supported, with just over 50% saying that they would not be welcome. And, 79.3% saying that improvements or changes would be required to roads to support increased residential and commercial building.



* majority is the combined results for strongly agree and agree

Your views on housing development in the village

The majority (by 15.7%) felt that the number of houses in Boxford was about right and over 50% said that between 10 and 25 homes had been built in the last 10 years.

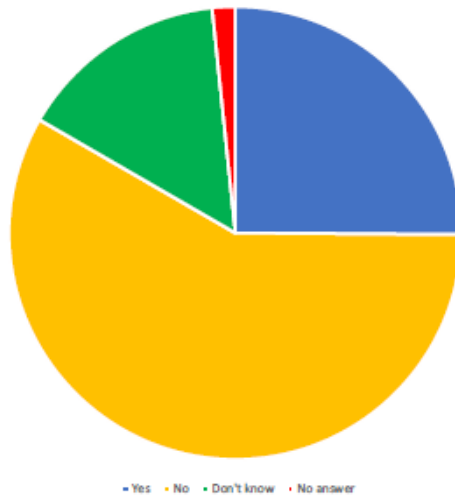


* majority is the combined results for strongly agree and agree

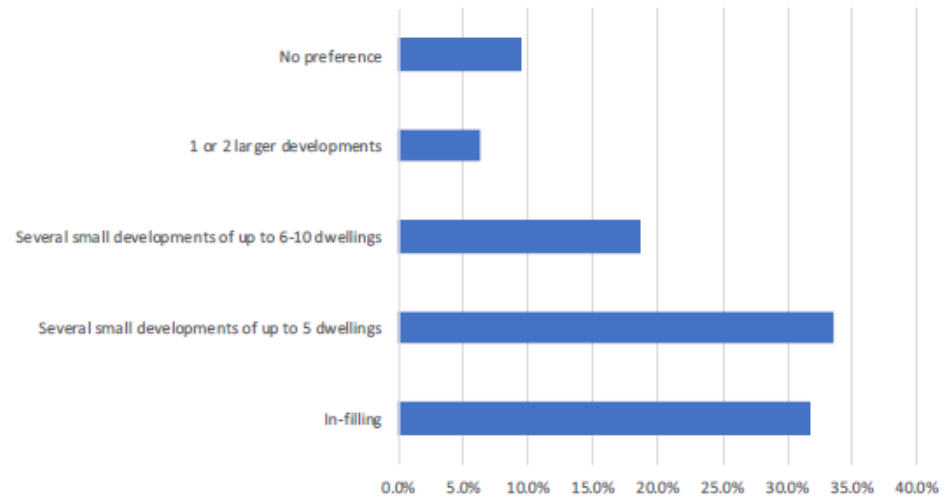
Your views on housing development in the village

Over 58% of respondents said that Boxford should not be allowed to expand outside the village envelope. And, in-filling and smaller developments of up to 5 dwellings were the most preferred form of future developments.

Do you think Boxford should be allowed to expand outside the village envelope into adjacent areas.



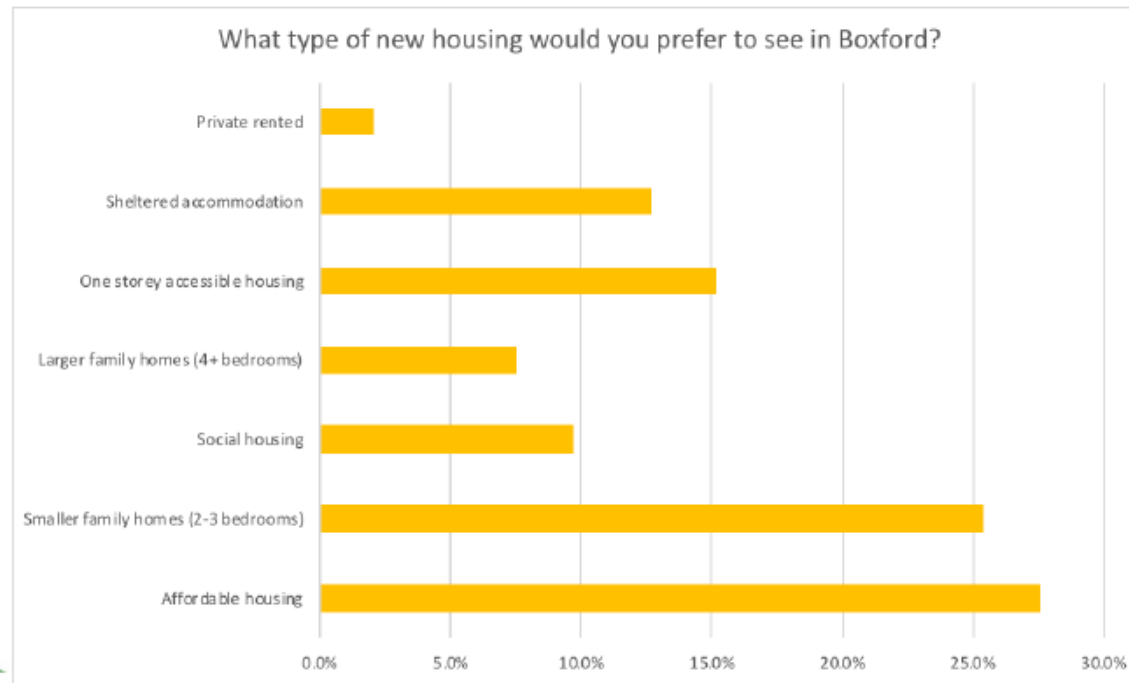
What form would you prefer any future development to take?



* majority is the combined results for strongly agree and agree

Your views on housing development in the village

The majority* would prefer to see affordable housing and smaller family homes (2-3 bedrooms).

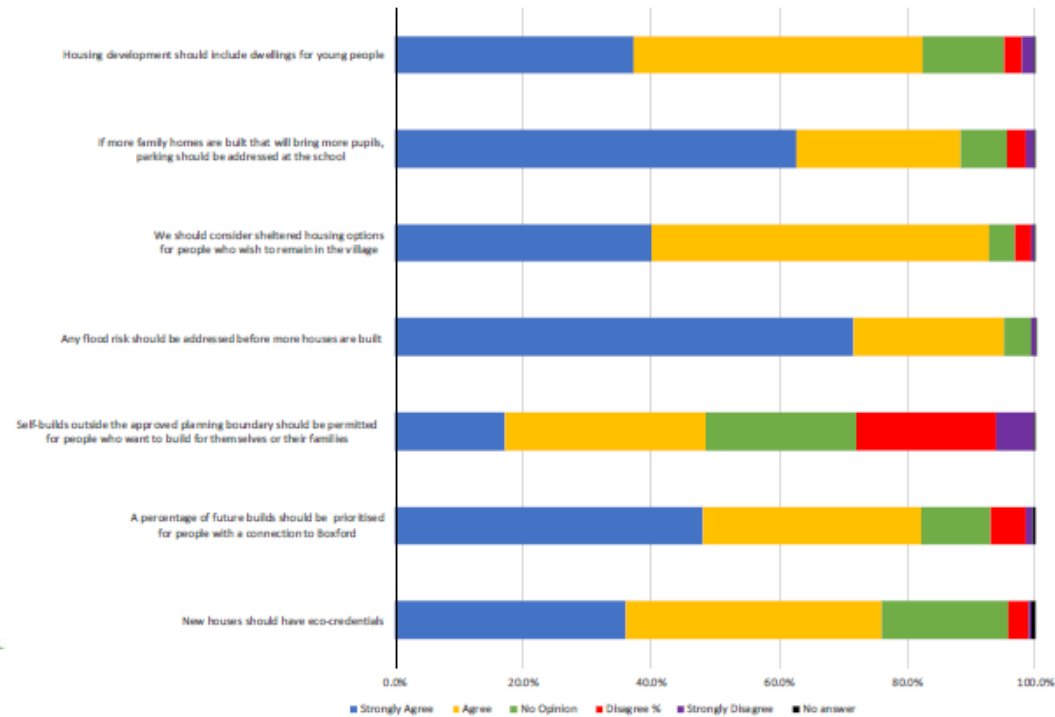


* majority is the combined results for strongly agree and agree

Your views on housing development in the village

The main* desires are for sheltered housing and dwellings for young people, with key concerns being flood risks and parking at the school. However there are strong views for all elements listed.

Desires and concerns regarding future building within the village.



* majority is the combined results for strongly agree and agree



Appendix D: Results of Informal Consultation – November 2020 to January 2021



Boxford Neighbourhood Plan – Responses to Informal Consultation on Policy Ideas – November 2020 – January 2021

Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
1	Vision	Vistry Group	Yes, we agree with the draft vision and consider it appropriate that the proposed Neighbourhood Plan period has been extended to 2037, in line with the Draft JLP	Noted	
2	Objective	Vistry Group	Yes, we agree with the principle of Objective 1, that new housing should be provided to meet the need of the current and future generations. This should reflect the requirement to meet local housing needs and should contribute to housing delivery both in the neighbourhood area and the wider district.	Noted	
3	Housing General	Vistry Group	National planning guidance states that “Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change and allows plans to remain up to date over a longer time scale.” NPPG Paragraph 103 Reference ID:	Sites to be investigated through Site Options Assessment	AECOM assessment

		<p>41-103-20190509. 4.3 Draft JLP Policy SP04 'Housing Spatial Distribution' states in relation to Neighbourhood Plans: "In order to assist with delivery of the overall district housing need requirements, designated Neighbourhood Plan areas will be expected to plan to deliver the minimum housing requirements set out in Table 4. Neighbourhood Plan documents can seek to exceed these requirements, should the unique characteristics and planning context of the designated area enable so."</p> <p>As previously mentioned, Table 4 of the Draft JLP sets out that a minimum of 13 new homes are required in the Boxford Neighbourhood Plan Area over the plan period. Of these 8 are identified as existing commitments that currently benefit from outline planning permission.</p> <p>The Draft JLP currently proposes to allocate one site, for 5 dwellings, at the Boxford Calais Street Hamlet under Policy LS01.</p> <p>Boxford is identified as a Core Village, due to the range of services and facilities available. Core Villages are clearly recognised as sustainable locations for accommodating new development, and act as a focus for development in Babergh district. There is a proven local housing need in Boxford, and it should be acknowledged that development in rural locations can also enhance the vitality of communities, through the provision of financial contributions and additional amenities and facilities.</p> <p>The Draft JLP makes clear that the housing requirements for Neighbourhood Plan Areas (provided at Table 4 of the Draft JLP) are the minimum that should be met and should be regarded as a starting point for addressing housing need for</p>		
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			<p>the area. It should also be recognised that, at this stage, the figures within the Draft JLP should not be relied upon as the Plan is yet to be tested at examination. Therefore, the Neighbourhood Plan Group should look to take a proactive approach in identifying where there may be opportunities to exceed the requirements in the Draft JLP, such as through the allocation of the land north of Butcher’s Lane, in order to meet the government’s objective of significantly boosting the supply of homes (NPPF, paragraph 59).</p>		
4	<p>Housing Strategy For Boxford</p> <p>BOX 1</p>	Jeremy Wagener	<p>Is the presumption that more houses are needed, albeit: “a handful of small developments with a lesser number of houses.. “, the impression we want to create?</p>	<p>Yes it is. This is based on a Housing Needs Assessment (HNA) which we have commissioned which indicates that :</p> <ul style="list-style-type: none"> • Ours is an ageing population with few young people being able to remain living in the village due, at least in part, to their being an insufficient supply of smaller dwellings as starter homes. • The purchase thresholds for an average market home for sale as 	

				<p>an entry-level home is insufficient for those on mean household incomes. Entry-level homes are therefore well out of the price range of those on lower quartile household earnings.</p> <ul style="list-style-type: none"> • The mean income (£49,400) is just below the purchasing threshold for shared ownership at the 50% level (£51,071). The purchase threshold is more favourable for those on mean incomes when it 	
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				<p>comes to shared ownership at the 25% level.</p> <ul style="list-style-type: none"> • In Boxford a 30% discount on average prices (as envisaged in the First Homes product) would not extend home ownership to those on mean incomes. A 40% discount is considered more appropriate. The rent to buy tenure may be viable for those on mean incomes but remains out of reach for lower earners. • Affordable and social rent appear to be the most affordable tenures 	
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				<p>for those on lower earnings. However, Lower Quartile households may be able to privately rent using housing benefit.</p> <ul style="list-style-type: none"> • The starter homes which become available as “affordable” from developments such as Weavers Field are at a 20% discount from the open market price and hence will not be truly affordable for families with the village’s mean income of £49.4k even if they can meet the other criteria for eligibility. • The estimated number of truly affordable homes needed in the plan period from 2018 	
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				<p>to 2036 is 28 at a rate of 1.53 per year</p> <ul style="list-style-type: none"> • This drives us to conclude that there is a need for a partnership with a housing association which is able to access state funding subsidies coupled with a policy requiring priority for the allocation of such housing to those with a proven local connection to the parish. <p>Clearly this is easier said than done but the alternative is to either accept that those young families who were raised in the village and wish to remain will not be able to do so or that our average age will continue to increase with a consequent</p>	
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				<p>effect on the primary school and the vitality of our community.</p> <p>There is a whole different but related argument to be made in respect of accessible dwellings for older people to downsize into hence freeing up larger family homes for growing families.</p>	
5		Jeremy Wagener	Can the village cope with more houses, even on this scale, without changes to its infrastructure?	<p>A good question! Some parts of our infrastructure such as the shops rely on a healthy mix in the population and the school in particular requires a steady and reliable stream of 4/5 year olds into its reception class which can only be provided by young families. The physical infrastructure such as water, sewerage, telecoms etc are outside the scope of the Neighbourhood Plan but can in theory be expanded as required</p>	

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				given the necessary funding. The road network is more difficult, but we are working on a plan!	
6		Jeremy Wagener	<p>How will “future housing need” be determined? The Government’s recent policy pronouncement seems to indicate a top-down approach, the infamous algorithm, with some regard to a Local Plan (a new one?). What can we do in the NP to influence matters by stating more forcibly (not necessarily negatively) how we feel about more houses? Do Boxes 1 & 2 express the constraints we want to see imposed adequately? Might we even specify where houses might be located or is this for a later stage in the NP? I fear a creeping encroachment! But I accept it’s a balance between “no more houses” and a “free for all”.</p>	<p>By using the HNA</p> <p>The present situation is indeed a free for all, but the NP gives us an opportunity to restrict the location, type and quantity of new housing within the parish to a very large degree. That said changes in national legislation may override the plan at some time in the future.</p> <p>The specific locations for limited development are for a later stage – and are bound to be controversial!</p>	
7		Jeremy Wagener	<p>Draft Vision</p> <p>I wasn’t sure that “market” would be understood by everyone. “Full price”? Not sure about that either! Would “respects” be better than “maintains”?</p>	<p>Worth considering. We have at least two audiences for this being</p>	

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				the parishioners and the Babergh Planners.	
8		Jeremy Wagener	Housing numbers How does 13 houses up to the year 2037 fit with the outline permission for up to 64 houses adjacent to Station Field? Or is this another reason for challenging that permission? Should we add this to our comments?	Babergh's Emerging Local Plan (ELP) calls for a minimum of 13 houses but there is no maximum. That said clearly the 64 on Weavers Field bears no relationship to their strategic plan nor does it make any contribution to the organic needs of the parish.	
9	BOX1	Vistry Group	Objective 1 states that housing growth will be provided to meet the needs of current and future generations. Policy BOX1 states that new development should be focused within defined settlement boundaries for individual dwellings or small groups, and that development will not usually be supported outside of the settlement boundary except for specific purposes such as meeting a need for affordable housing, agriculture, forestry etc. As currently worded, policy BOX1 assumes that new housing will be brought forward largely on an 'ad hoc' basis, within the settlement boundary, and we do not consider this will enable the flexibility for Objective 1 to be met. Policy BOX1 should provide flexibility for housing on suitable sites outside the currently defined settlement boundary, which relate well to the existing settlement, where it is demonstrated that there is a proven local need. National planning guidance states that housing	Site Option; AECOM	AECOM site options

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			<p>supply policies in the Neighbourhood Plans should take account of the latest and up-to-date evidence of housing need (NPPG paragraph 040 Reference ID: 41-040- 20160211). Land north of Butcher’s Lane should be included as a site-specific allocation within Policy BOX1 to meet a proven current local housing need. The Site is well related to the existing settlement and the development of the Site would bring considerable community benefit with the provision of new footpath links and open space, on land that is currently in private ownership, connecting development to the south with the playing fields and allotments to the north. Such community benefits are only feasible through the development of a larger site, whereas numerous ‘ad hoc’, smaller developments would not be able to bring the same benefits to the village. A larger site also provides the opportunity to offer a range of dwelling types to meet the differing needs of the community.</p>		
10	BOX1	Hopkins Homes	<p>Whilst noting the Objective <i>‘to provide for housing growth of all tenures and sizes to meet the needs of the current and future generations’</i>, the subsequent content of suggested Policies BOX1 & BOX2 appears unlikely to be able to achieve this aim.</p> <p>As we recently set out in our representations to the Babergh Mid-Suffolk Joint Local Plan, Boxford is identified as a Core Village, but is not proposed to be allocated anywhere near the level of growth of that of other Core Villages. The total committed and allocated growth in Boxford is just 77 dwellings, which is far below the average level of growth proposed in Babergh’s other Core Villages of 193 dwellings. We therefore advised the District Council that Boxford should</p>		

		<p>be allocated more growth to reflect its important function as a key settlement serving both its own residents and those of surrounding rural villages and in a similar vein, would therefore strongly suggest that to achieve the above Objective, positive further allocations of land to deliver new residential development should be made within the Boxford Neighbourhood Plan.</p> <p>In this context, we consider our site on the land West of Sand Hill to represent a uniquely sustainable option to deliver additional residential growth.</p> <p>As you may be aware, the site comprises approximately 3.5ha of agricultural land which is located the south of the village, immediately adjacent to the existing settlement limit and existing residential development. To the north of the site is the residential development of The Causeway, to the east the site adjoins residential development and agricultural land, and the south is agricultural land. The site is bordered by trees and hedgerows to the north, east, south and west. The site is located on the fringe of a Special Landscape Area and adjoins Boxford Conservation Area. The majority of the site lies within Flood Zone 1, with an area to the west falling within Flood Zones 2 and 3 which follows the route of the River Box. The site benefits from extensive frontage along Sand Hill, meaning that provision of a safe and suitable access is entirely feasible, has been tested and agreed with the Local Highway Authority the site is also well connected to the existing network of footpaths in the surrounding area.</p> <p>As outlined upon the attached Masterplan, the site can be developed for approximately 30 dwellings, including</p>		
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			affordable housing, with vehicular and pedestrian access from Sand Hill. The quantum of development proposed would allow for a relatively low density of development to respect the edge of settlement location and allow for the provision of a new landscaped edge to the south of the village, including on-site open space provision.		
11	BOX1	Carter Jonas	Land at Stone Street Road can provide a car park adjacent the school		
12		Jeremy Wagener	All the mapping is excellent. Should we define “Settlement Boundary” for the benefit of ordinary folk like me and to clarify its significance? Is it the same as what I used to know as the village envelope?	Good point and yes, it is!	
13		Jeremy Wagener	Do we need first to review and redefine the Settlement Boundaries? Otherwise agreed.	It is not clear that we have the power to change the settlement boundaries which have been defined by Babergh as shown in the preceding maps. How should they be modified? Incidentally Partridge Close is actually outside our parish boundary	
14		Jill Laurimore	obviously the Babergh Mid Suffolk Local Plan of 13 new dwellings up to 2037 is inaccurate - and how! What with Catesby etc.	The net number is now nearer to 5 given that 8 planning consents have been granted since 2018. However, the figure is a minimum set by the	

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				strategic planning team at BDC and no maximum is specified. Absent any limitations imposed by the planning policies in a fully adopted NP the operational planners at BDC will continue to seek to fulfil their higher-level remit to grant consents for the maximum possible number of dwellings to address the national housing crisis. This is the principal reason for developing the NP!	
15		Paul & Jane Kirkham	We very much support the principle that you set out in favour of encouraging small scale well considered piecemeal additions within the village boundaries to achieve additional housing rather than the sledgehammer approach of the volume housebuilder's sprawling estate housing additions which are very difficult to control in terms of quality of design and typically show little reference to the real character of the village. The GRP false chimneys of Station Field a perfect example.	Noted	
16		E Wagener	I am concerned to note that although you state that new developments are not generally supported outside the settlement boundary this is not the case where affordable	No, it does not. Affordable housing is unattractive to developers, unless they are	

			<p>housing needs are an issue. You don't have much say on agriculture etc. I know. We live outside the settlement boundary on Cox Hill. Does this mean that affordable housing could be built anywhere in unregulated numbers outside this area regardless of the impact on the village as a whole?</p>	<p>very desperate, since it involves the same costs as market housing for a much-reduced return. However, we would be happy to entertain proposals for such development if it met the village needs. Essentially we look to retain the option to propose sites for truly affordable housing, probably provided through a housing association, which are situated outside the existing settlement boundary of the village. These are termed "Exception Sites" an example of which is the Station Field estate. They can be made financially viable through state subsidies and reserved for families with a village connection through the use of a "Local Connections Policy".</p>	
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17		Ian & Stephanie Atkins	Agree with the Housing Strategy & Need. Particular focus should be given to small pockets of development and a good broad mix of housing, especially bungalows which might encourage people to downsize when they feel the need. (Newton is a good example of small developments but included bungalows there).	That is our proposal since we will continue to need a modest number of truly affordable smaller properties to become available in the coming years to cater for the organic growth in the village population. Downsizing should free up larger properties for growing families.	
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
18	Local Needs Housing BOX 2	Stephen Howarth	Should the NP identify small sites to meet local need?	The power of the Neighbourhood Plan is that, once it is fully agreed and accepted both by the village at referendum and by BDC etc, the policies which it contains will have the same authority as those of BDC itself when their Planning Committee make decisions on applications for planning consent. In effect this means that if the plan designates areas in which development is permitted then development elsewhere is not hence protecting the village from	

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				<p>overdevelopment. However, the village will have a continuing need for limited expansion to allow for natural population growth and hence housing need - but only where we want it to be. If this principle is accepted, then the next question is where. Clearly this is where it will become more complicated since the agreement of landowners and villagers will be needed but without agreement in principle at this stage, we will have no credibility in negotiations.</p>	
19	BOX2	Vistry Group	<p>Policy BOX2 'Housing Need – Size and Type' states that housing need should be provided in accordance with the Housing Needs Assessment produced in October 2020. It is not clear what report this is and is therefore difficult to comment fully without sight of this document. It also cannot be relied upon that this report will remain up to date for the Neighbourhood Plan period. Therefore, it would be more appropriate for policy BOX2 to clearly reference that housing need should be provided in accordance with the October 2020 Housing Needs Assessment, or any more up to date evidence. It is also important to note planning guidance which states that any Neighbourhood Plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary</p>	<p>Noted . Supporting text will need to address this.</p>	

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			by locally produced information (NPPG Paragraph 103 Reference ID: 41-103-20190509).		
20		Maggie Thorpe	we need more small houses for young people, starter homes like the ones built at the entrance to the playing field (Homefield). They look much more in keeping with the village than the huge monstrosities built in Cygnet Court. Bungalows seem to me to use up land space for very few residents.	<p>You make a good point regarding the advantages of flats over bungalows as starter homes. The same may not be true of small dwellings for people who wish to downsize in order to free up family homes for their children to raise families of their own. Under such circumstances accessibility can become more of an issue and hence move the preference towards bungalows.</p> <p>The ideal answer may be to look for a mix of though the affordability of flats over bungalows is an additional significant factor.</p>	
21		David Warren	Would it be possible to insist that more than 20% first homes be provided?	We are looking to find a number of smaller sites of 5 or 6 dwellings on an infill basis where possible and so a target of 20% of first homes would mean one on each site. Under normal circumstances developers are only required to provide for "Affordable Homes" when developing over 10 houses and then to provide for 35%. The rules say that they should be discounted for sale by 25% from the open market value. However, the Housing Needs	

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				<p>Assessment (HNA) which we have commissioned indicates that to be truly affordable for the lowest quartile of income in the parish the discount needs to be 40%. Clearly requiring a commercial developer to follow this yardstick would make the whole project unviable from a commercial aspect and hence undeliverable. The alternative which we need to explore is to engage with a Housing Association which can access state subsidy and tilt the viability criteria towards a mix maximising the truly affordable homes. However, at this stage we are looking for views on the policy ideas rather than the detail hence the fairly broad questions which we have posed.</p>	
22		David Warren	<p>It would be beneficial to identify small sites to meet local need.</p>	<p>Absolutely! We have some ideas as to where they could be, but it would be premature for us to discuss them at present. Better to prevent hares running!</p>	
23		E Wagener	<p>I feel that there is always a big emphasis on affordable housing when housing need is discussed. Boxford has a good supply already I would imagine. A greater mix of housing I think might be more appropriate for a village which</p>	<p>Clearly, we need to maintain a healthy mix of all sorts of housing for the good of the village in the longer term. The Housing Needs Survey which we have commissioned shows that :Boxford is</p>	

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			<p>has offered this mix for centuries. Too much emphasis on any one type of housing risks upsetting the present balance which is one of the reasons Boxford is such a lovely village in which to live.</p>	<p>characterised by a very high proportion of home ownership, whilst the proportion of shared ownership households is low. The proportion of private rented is significantly lower in Boxford compared to district and national levels. Likewise, the proportion of social rented households is also lower, although the figure is more comparable to the proportions found at the district level. Private rented was the only tenure to experience growth in Boxford, albeit at a significantly lower rate than the growth recorded in Babergh. Both owned and social rented tenures declined contrasting the growth seen in Babergh. There was no change in the amount of shared ownership in Boxford, contrasting the significant growth found at a district and national level.</p>	
24		Ian & Stephanie Atkins	<p>Safety is paramount and the suggested turn into the proposed new development on Sand Hill was highly dangerous and not thought out at all. Similar developments have been accessed by the use of new roundabouts, thereby slowing all traffic and allowing safe turning (A140 has examples of this). Key walkways are needed but must make provision for wheelchair and pushchair users. Perhaps some new footpaths</p>	<p>We are working on the transport section of the plan at present and will probably be in touch.</p>	

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			could be implemented to allow not just access to the village, but to the countryside beyond. There are some sizeable areas which lack footpaths in this area. Improving access and using a joined-up approach to connect public transport for commuting and education would make a great deal of sense! David is working on the transport section of the plan at present and will probably be in touch.		
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
25	Safety for vehicles, pedestrians and cyclists BOX 3	Jeremy Wagener	Agreed but we should avoid unsightly signage in the village (Box 8 probably covers my comment)	Noted	
26	BOX 3 and Objective 2	Vistry Group	We consider that Objective 2 should require new development to ensure safe vehicular and pedestrian access throughout the village, not just to the village centre.	Village centre is the main problem. Noted	
27		Jeremy Wagener	for the village there is also the importance of Cox Hill as a safe, accessible village entrance point for cars, cyclists and, to some degree,	The improvement of our footpaths is not strictly within the scope of a Neighbourhood Plan since it is not a matter which is subject to planning policy. However, we are planning to put	

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			<p>pedestrians. As regards pedestrians including the many walkers who enjoy our countryside, accessibility from Cox Hill into the village would be greatly improved if the existing footpath from Cox Barn to Fen Street could be made friendlier and more passable, and if a new footpath could be created to meet it from halfway down Cox Hill.</p>	<p>together a connectivity improvement plan encompassing footpaths, cycleways and pavements amongst our proposals which, subject to consultation and referendum, would become a project for action by the Parish Council.</p>	
28		Stephen Howarth	<p>Is there any scope for declaring the entire village a 20-mph area and recording this as an objective?</p>	<p>You make a good point! We will look at this when drafting the transport section of the plan. I suspect that the practical challenge, as with the existing parking restrictions, will be enforcement but the speed limits must come first.</p>	<p>Look at 20mph limit in drafting the transport section.</p>
29		Paul & Jane Kirkham	<p>We very much support your stated strategy of developing more and better pedestrian routes around the village to encourage safe walking and cycling (thereby discouraging, for example, parents from driving their children to school in the village unless absolutely necessary etc</p>	<p>Noted</p>	
30		E Wagener	<p>if using the countryside footpaths there needs to be an assurance that landowners will maintain these in a good and safe condition for pedestrians</p>	<p>A good point. I am not aware of the law and practice around this but will investigate and see whether it is an area in which the NP can have any worthwhile influence.</p>	<p>Research the law and practice</p>

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			and that those routes that are also open to cyclists and horse riders are clearly marked. Round us we have footpaths that are becoming difficult to walk due to overuse by those not on foot and by farm vehicles. Also new paths are being made where there is no public right of way.		re footpaths.
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
31	Improving access and reducing congestion BOX 4	Jeremy Wagener	Agreed. Improve the bus shelter (though I believe it's a heritage site!).	It is listed	

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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
32	New Village car Park BOX 5	Steve Fitzgerald	Not being able to park near the shops because of residents and owners of the shops parking in front of the shops all day, just makes me pass by and purchase items elsewhere. There should be limited parking introduced outside Boxford shops, perhaps 20 mins Max. This would increase business for the shops that we still have. At present having to park further up the street especially for the older residents of the Village is not ideal.	Parking is a problem in the village, and you make a good point in support of our existing shop businesses. There is of course a contrary view which could be put by their immediate neighbours! We shall consider this very carefully. The Plan will certainly have the provision of a village car park as a key requirement. Restricting and necessarily controlling and policing parking has a number of advantages and disadvantages as residents and business owners alike would testify and common ground is hard to find.	
33	BOX5	Vistry Group	We support this policy objective.	Noted	
34	BOX3	Vistry Group	In general, we support the proposed transport policy ideas. We support that policy BOX3 encourages key walkway routes around the village to be enhanced. For effectiveness, we encourage the inclusion of a plan to identify these key walkway routes. There are currently a number of informal routes that have been created on land north	Noted	

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			<p>of Butcher’s Lane. However, this is private land and whilst the landowner has not prevented local residents from using the footpaths to date, there is currently no public right of way across the Site. The proposed development of the Site would enable these routes to be formalised and connectivity through the village would be enhanced as part of the proposals. In accordance with proposed policy ideas BOX3, the development would also link to the existing Public Rights of Way network along the western site boundary.</p>		
35		Jeremy Wagener	<p>Agree the village requires a car park. Where? Off Stone Street behind the school? Access?</p>	<p>We are just proposing policy ideas at this stage but have our eye on a possible site.</p>	
36		E Wagener	<p>Urgently needed but it needs to be easily accessible to the village otherwise it will not get much use. At the moment there seems to be a lot of parking on double yellow lines making access more dangerous and difficult. Before Covid I often couldn't park in the village during the day. People car sharing and parking their cars in the village all day?</p>	<p>All agreed. We have a few ideas as to potential car park sites but have yet to consult landowners. On street parking is a further problem and the existing double yellow lines need to be enforced as a start!</p>	

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37		Ian & Stephanie Atkins	New Village Car Park would be desirable, especially since on street parking is increasing all the time and is therefore making our roads challenging and unsafe to negotiate. The BCC did try and set up a plan for a Village Car Park some 30 years ago, using the meadow land adjacent to the school. Due to multiple ownership and ransom strips, we were unable to pursue this plan! Perhaps this suggested area may be easier to pursue now.	We certainly hope so!	
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
38	Design of New Development/ General Design Principles BOX 6	Jeremy Wagener	Noise can also be an issue (see also Box 18 where the same applies to businesses in the village e.g. on Cox Hill and beyond towards Wickerstreet Green).	Noted	

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39		Paul & Jane Kirkham	<p>We welcome the emphasis noted regarding the importance of good design, but we would like to see also specific mention made of encouragement for well-considered <u>contemporary</u> design. We believe the village should be progressive in its approach to design and not stuck in the past. A lively and vibrant village should have interesting and carefully considered modern buildings sensitively incorporated into the pattern of the more traditional. Innovation and creativity should not be stifled by blanket policy for conformity, whether within or outside the Conservation Area. The distinctive rural character of the village can be maintained in many different ways.</p>	<p>We now have a "Design Guidelines and Codes" report which has been produced for us by a consultant and paid for by "Locality" using state funds. The general design principles for Boxford section includes the following: "The local pattern of streets and spaces, building traditions, materials and the natural environment should all help to determine the character and identity of a development, recognising that new building technologies are capable of delivering acceptable built forms and may sometimes be more efficient. It is important with any proposal that full account is taken of the local context and that the new design embodies the "sense of place" and also meets the aspirations of people already living in that area. Reference to context does not mean to copy or use pastiche solutions. It means using what is around as inspiration and influence and it could be a contemporary solution that is in harmony with the surroundings. This guide will outline the elements that make an important reference point."</p>	
40		Paul & Jane Kirkham	<p>We would like to see innovative design solutions permissible within areas at risk of flooding rather than a</p>	<p>Under the heading of "Sustainable Building" – New Homes" the document calls for Flood resilience and resistance e.g., raised electrical, concrete floors and greening your garden</p>	<p>Strength en the point in the main</p>

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			blanket exclusion. Good solutions have been achieved in other parts of the country where development has been achieved which adequately addresses the challenges in flood zones.	We will look to see how we can strengthen this point in the main body of the plan.	body text
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
41	Boxford Character/ Vernacular BOX 7	Jill Laurimore	the 'specific palette of materials' should not discourage contemporary innovative design. New building can be absolutely contemporary but with its roots in the local vernacular. Again, Scale is of paramount importance. e.g., Partridge Close's scale works well with all its neighbours whereas the new houses at Cygnet Court are totally out of scale presenting monolithic slabs of red brick overpowering their neighbours.	Agreed. We have commissioned a piece of work from consultants, paid for by state funding, to produce a Design Guide. We expect to see their draft report this month.	
42		E Wagener	Agree but don't forget Cox Hill! Wonderful views of the village and towards Groton from up here.	Noted!	
43	BOX7	Vistry Group	We recommend that Objective 4 and emerging policy ideas BOX6 and BOX7 would be more appropriately dealt with under a separate heading relating to the 'Built Environment and	Noted. Design Code/Guidelines is in production	

		<p>Design of New Development’. The NPPF sees the creation of high-quality buildings and places as fundamental to what the planning and development process should achieve, with good design being a key aspect of sustainable development (NPPF paragraph 124). As set out within paragraph 125 of the NPPF, Neighbourhood Plans can play an important role in identifying the special qualities of an area and should explain how this is reflected in development. It is important for the Boxford Neighbourhood Plan to provide clear policy on design. The preparation of ‘Design Guidelines’ in policy idea BOX6 is supported. In line with the NPPF (paragraph 126) it is important that the design guidelines do not become restrictive and allow a suitable degree of variety where justified. It is also appropriate to acknowledged that through the allocation of suitable land for development, the Neighbourhood Plan Group could foster greater influence over the nature, design and form of development in the village. The preparation of policy idea BOX7 to define the special character of Boxford and why it is important is supported. Appropriate evidence should be provided in identifying any key views. It is noted that policy idea BOX7 also states that work is currently underway to produce a</p>		
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Boxford Neighbourhood Plan Consultation Statement January 2022

			specific palette of materials for Boxford and in principle this is supported. However, as mentioned above, it is important that this does not become overly restrictive and that the palette of materials is appropriate to all building types, including low-cost housing.		
44	Historic Environment and Design	Hopkins Homes	Whilst noting the contents of suggested Policy BOX6 – ‘ <i>The Design of New Development/General Design Principles</i> ’ and largely supportive of their aims in ensuring high-quality development results, it will be important that these are expressed flexibly rather than overly-prescriptively, in order that developments can be designed appropriate to their individual circumstances.		

Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
45	Historic Environment and Conservation Area	Vistry Group	It is recommended that Objective 5 and policy ideas BOX8 and BOX9 are dealt with under a new heading ‘Historic Environment’. We consider that Objective 5 should make reference to the ‘historic environment’ of the Conservation Area to better align with national planning policy. We agree with the general direction of policy idea BOX8 and it is important that the policy wording is consistent with policy to conserve and enhance the historic environment within the	Noted	

Boxford Neighbourhood Plan Consultation Statement January 2022

			NPPF.		
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
46	Non-Designated Heritage Assets BOX 9	Jeremy Wagener	Possibly the old village Pump House in use until the 1950s now part of the Cox Hill House property and converted into a residential annexe. But there's nothing to be seen of its internal workings (Roger Loose has details).	Noted. Thank you	
47		E Wagener	We also have 2 but quite small ancient stones by our main gate onto Cox Hill.	The numerous stones are on the list.	

Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
48	Localised Flooding	Jill Laurimore	We are concerned that existing very old drains are expected to cope with so much new building (the drain	It is certainly a concern given the history of flooding in the village. The issue is that of increased rapidity of storm water runoff due to an increase in impermeable surfaces in the catchment area which overloads the capacity of the	

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	BOX 10		down Swan Street a case in point?)	surface water drains and watercourses to carry it away. However, this is not an insuperable problem given a requirement on developers to provide a proper and effective engineering solution – which is what the final paragraph in this box requires. This might include measures such as swales or catchment areas to slow down the runoff and improvements to the existing drainage systems to take the water away more rapidly - but I am not an expert either!	
49		E Wagener	Very important issue especially with climate change. Needs to be taken very seriously. Flooding is surely going to be more of a problem in the future and development in the wrong place could one day cause disaster to homes near the Box in the village.	Absolutely	
50		Ian & Stephanie Atkins	This is very important since the proposed new development had definitely not made provision for proper drainage and were not concerned with flooding issues at all, even though in recent weeks we have again seen dangerously high levels	Flooding is indeed a major consideration given the village history of problems and the unfortunate decision some years ago to build in some flood prone areas.	

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			<p>on the river, flooded fields and nowhere for the water to go! This is probably the most important factor to consider. Rainwater capture, solar panels, electric charging points would all help as well, as would plenty of tree planting since trees take out so much excess water from the land and give us back oxygen, clean the air, alleviate pollution and add beauty and cover in the process.</p>		
51		Vistry Group	<p>We agree with the proposed policy BOX10 'Localised Flooding' which should follow the direction of national planning policy. In principle we agree with the proposed policy idea BOX11 'Environmental Design' and the importance of new developments incorporating energy efficiency measures where feasible. However, it is important that sufficient flexibility is</p>		

Boxford Neighbourhood Plan Consultation Statement January 2022

			incorporated into the policy to account for the viability of providing such environmental design features.		
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
52	Environmental Design BOX 11	Vistry Group	It is important for the Neighbourhood Plan to include an objective on climate change, with the NPPF stating that “Plans should take a proactive approach to mitigating and adapting to climate change” (NPPF paragraph 149). We consider that Objective 6 would be better reworded as follows: “To encourage new sustainable housing growth that takes a proactive approach to mitigating and adapting to climate change”.	Noted. Review	
53	Sustainability and Climate	Hopkins Homes	Whilst similarly noting the contents of suggested Policy BOX11 – <i>‘Environmental</i>	Noted. It is understood that examiners do not tend to favour prescription in this area	

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	<p>Change Policies</p>		<p><i>Design'</i> and largely supportive of their aims in ensuring high-quality development results, it will similarly be important that these are expressed flexibly rather than overly-prescriptively, in order that those features most appropriate to the specific development and circumstances can be incorporated.</p>		
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
54	Landscape Protection and Important Public Scenic Views BOX 12	David Warren	View from the top of the footpath that runs up the hill towards Cox Hill - to the East of view 3 is wide reaching and stunning.	Thank you. We will take a look – and photographs!	Include Cox Hill as a 4 th entry to the village
55	BOX 12	Vistry Group	In order to not be overly restrictive, policy idea BOX12 should reflect that important views are to be protected from ‘inappropriate’ development, to acknowledge that not all development will adversely affect important views.	Noted	
56		Jeremy Wagener	Add view from the path alongside the Bowling Green looking over the rooftops towards the Church.	Noted. Thank you	

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57		Ian & Stephanie Atkins	<p>Protection of current views and scenic beauty should be maintained in any process. Protection and enhancement of Natural Features such as woodland, tree belts, ponds. Any new development would definitely need to incorporate such features, enhance or expand them as appropriate, or set up new natural habitats. Protection of all current green spaces is essential (and assists with drainage as well!) and provision of new areas. For example, the fields/meadow adjacent to the school could be utilised for a car park but perhaps with a small nature reserve alongside it. The portion of the river that runs past the school is a known habitat for kingfishers and small egrets. There are bats in this area and no doubt many other examples of wildlife and birds.</p>	Absolutely!	
58	BOX13	Vistry Group	Policy idea BOX13 'Protection and Enhancement of natural	Noted	

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			<p>features' should be prepared in line with national policy for conserving and enhancing the historic environment.</p> <p>We acknowledge the landscape importance of the box river corridor and policy idea BOX14 should relate to 'inappropriate' development rather than restricting all development.</p>		
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
59	Protection and Enhancement of natural features BOX 13	David Warren	Could provision be made, that where trees are shown on development plan mature trees are planted. Also could all boundaries be planted with native hedging?	Good idea!	

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60		Jeremy Wagener	Agreed. Would it be feasible to get householders, businesses including farms to sign up to a voluntary “code of best practice” in relation to natural features and conservation?	This would rely upon goodwill and be unenforceable but is worth considering.	Consider a code of best practice
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
61	The River Box Scenic and Wildlife Corridor BOX 14	Hopkins Homes	<p>Whilst acknowledging the desire to provide additional protection to the corridor of the River Box under suggested Policy BOX14 – <i>'The River Box Scenic and Wildlife Corridor'</i> the requirements for such a Policy are now superfluous, with emerging Policy LP19 of the Joint Local Plan now providing a criteria-based assessment when considering all proposals for new development within or adjacent to previously undeveloped valued landscape areas.</p> <p>Given also the difficulty in providing an evidence-based analysis to justify the extent of any such proposed area, it is also strongly suggested that this Policy be omitted. To this</p>	Not superfluous. Other NPS have been successful in this vein.	

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			end, the current references to such areas within suggested Policy BOX12 and the designation of the area upon the Map entitled ' <i>The Box River Valley Special Landscape Area and Dedham Vale AONB</i> ' on Page 22 should also be removed.		
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
62	Local Green Spaces BOX 15	David Warren	Agree (maybe add Cox Hill - NW Side)	Thank you. We will take a look at it as another Local Green Space.	Consider adding as a further Green Space
63		Jeremy Wagener	Does Cox Hill qualify as a "village entrance"? Should it be protected from development? What does this mean in practice?	It means that land so designated cannot be developed but must be left as green space. For Cox Hill which specific areas should be so designated and why?	

			<p>Does the Croft include the field to the east of the footpath beside the Bowling Green which has an unofficial footpath from Fen Street to the allotments? The “green map” seems to exclude it. I believe it is owned by a farmer.</p>	<p>No, it does not however it is so shown in the Babergh ELP. It is owned by a farmer and a developer.</p>	
64		E Wagener	<p>All green spaces need to be retained. Pity Cox Hill is outside the designated area all the land beyond the settlement boundary is agricultural as you know but a lot borders on housing and some backs on to a the Spenny and has been used in the past, pre-covid, for scout camps. Historically the house on the left at the top of Cox Hill was a prisoner of war camp for Poles so might have some small interest. The nice thing about Boxford is how it still nestles into the valley maintaining its ancient</p>	<p>Understood. The criteria for inclusion are: <i>The Local Green Space designation should only be used where the green space is:</i> <i>a) in reasonably close proximity to the community it serves;</i> <i>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), tranquility or richness of its wildlife; and</i> <i>c) local in character and is not an extensive tract of land.</i> Thank you your additional remarks. I will feed them into the mix but fear that we will have little chance of influencing planning policy for agricultural development. The fundamental structure of the village has of course changed over the years with the housing developments at Daking Avenue, Running Waters and Station Field but enough is enough!</p>	

Boxford Neighbourhood Plan Consultation Statement January 2022

			<p>layout. From roads and paths further afield the views of the countryside are so beautiful and often the only visible sign of a settlement is the church. Not very good points for the N.P. probably.</p>		
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
65	Protection of Existing Village Services and Facilities BOX 16	Jill Laurimore	add in other shops and the Café.	Noted	Look at the list of village services again
66		Ian & Stephanie Atkins	Protection of Existing Village Services and Facilities is crucial. That is what makes Boxford so popular that, despite being a rural village, we have	We are in accord with this. The walking bus idea is one which we had not thought of and will add it to the draft.	Add the Walking Bus idea to the transport section?

			<p>plenty of key facilities which we have fought to maintain over the years! Sadly, due to these key facilities we are seen as a 'Core Village' and consequently new developments keep being launched at us! We should encourage multi use of some facilities, such as the Pavilion to ensure they are adequately used. The Village Hall seems to have a diverse range of bookings for example. We should allow expansion as and when needed, but only if suitable and no adverse impacts are shown. Support for new facilities if they are required, but only with due consideration on their impact. Provision for off road parking for staff at school and Sunflowers could be made within the suggested village car park adjacent to these facilities, as previously mentioned. They could have a</p>		
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			<p>designated area and the proximity would be ideal. Additional footpaths and cycleways could be introduced, which may encourage more parents to walk or cycle with their children to school and thus alleviate the traffic. If footpaths are adequate and linked, they provide a good route to school. I was personally part of the 'Walking Bus' scheme at Boxford some years ago, which we did for some months. The children were collected at various points in the village by 2 or 3 responsible adults and walked to school – they loved it!</p>		
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
61	Supporting New Community	Vistry Group	We support that the existing village services and facilities	Noted	

Boxford Neighbourhood Plan Consultation Statement January 2022

	Services and Facilities BOX 17		should be protected (policy idea BOX16) and also agree that there will be support for new community facilities and services (Policy idea BOX17)		
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Rep No	Policy Number or Theme	Respondent	Response	Steering Group Response to Comment	Action
62	Support for small scale extensions to existing business BOX 18	Jeremy Wagener	As residents of Cox Hill, my wife and I are very aware of two businesses which are based to the left and right of our house. They have expanded in recent years and traffic and noise on Cox Hill and for the surrounding houses has increased but is not unacceptable - yet. There is also more schools traffic to and from Wickerstreet Green. Access on foot or by bicycle to and from the village is difficult (an existing footpath from Cox Barn to Fen Street has been	Thank you for this which is noted.	

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			<p>impassable at one point). Better accessibility is very desirable. Both businesses provide local employment which is obviously desirable. So, expansion “in a suitable way” probably requires further definition and caveats. The infamous junction at the bottom of Cox Hill is one issue.</p>		
63		Jeremy Wagener	<p>The land to the west of Cox Hill (on the right-hand side going down the hill) is outside the Settlement Boundary and therefore should be protected from development. But does this mean only housing development? My concern is that there are two businesses, one halfway down Cox Hill and the other at the top, which are generating more traffic (some of its heavy good’s vehicles damaging the road surface and verges) as they have become busier and may</p>	<p>agricultural development is subject to certain permitted development rights and therefore much 'agricultural' activity does not necessarily require permission but may only be subject to notification to the local authority.</p>	

Boxford Neighbourhood Plan Consultation Statement January 2022

			also look to expand their premises into the adjacent agricultural land. I am conscious of the employment aspect and its importance for planners (and a NP) in weighing up planning applications		
64		E Wagener	over expansion of some businesses could pose problems for the village and beyond. The agricultural machinery business on Cox Hill, although outside the settlement boundary can cause problems in the village with huge container lorries and low loaders trying to squeeze through. Verges and banks are being eroded, water mains being damaged, and noise must affect some residents quite considerably. Nothing you can do but expansion needs to be watched for it's potential to adversely impact on the village as a whole. Other businesses might appear	Agricultural businesses are governed by different laws and regulation to domestic development and hence have a number of exemptions. However, the traffic problem is very significant already. The good news is that non-agricultural businesses are not so exempt and hence their development can be controlled.	

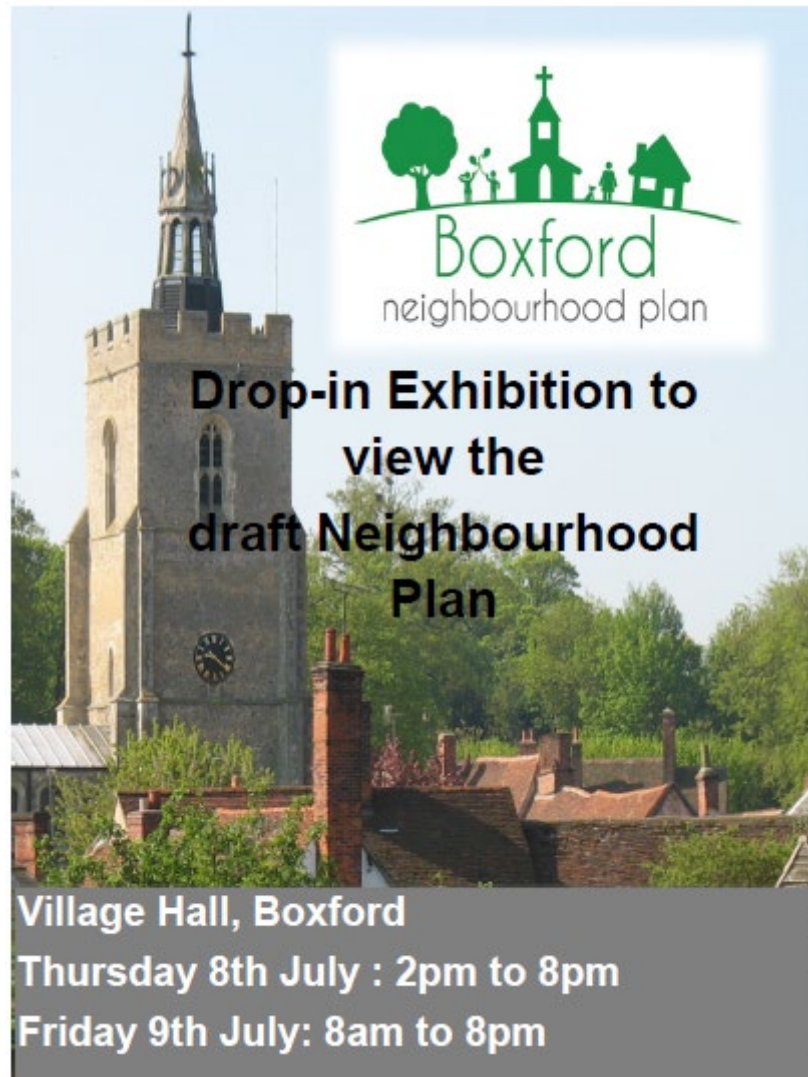
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			outside the settlement boundary in the future too.		
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Sites put forward for development:

1. Land at Butchers Lane – Vistry Group
2. Land west of Sand Hill Road – Hopkins Homes
3. Land at Stone Street Road – Carter Jonas.

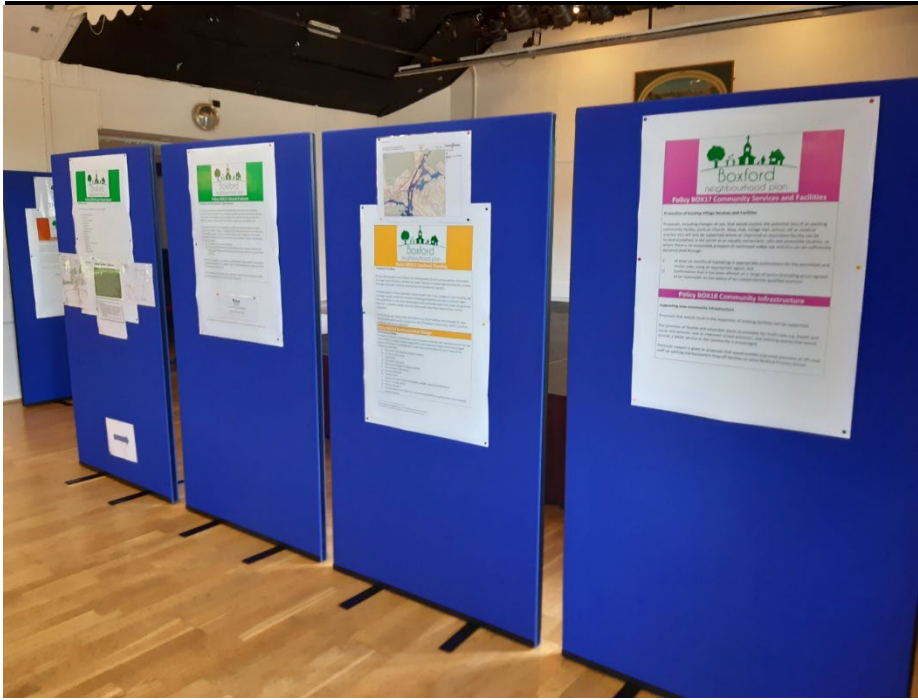
Appendix E: Regulation Publicity and Exhibition

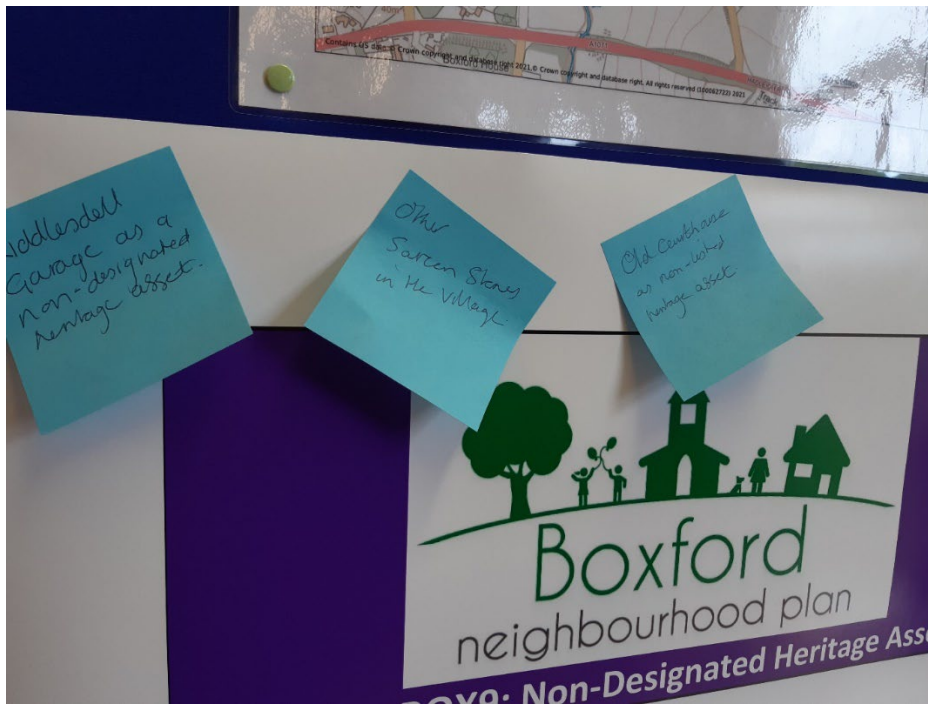


Boxford
neighbourhood plan

**Drop-in Exhibition to
view the
draft Neighbourhood
Plan**

Village Hall, Boxford
Thursday 8th July : 2pm to 8pm
Friday 9th July: 8am to 8pm





Appendix F: Consultee Letter/Notification



I am delighted to inform you that the pre-submission consultation on the Boxford Neighbourhood Plan begins on **8th July 2021** and concludes at midnight on **2nd September 2021**.

Details of the consultation including the location of hard copies of the plan, how to make comments on the plan and details of the public exhibitions can be found on the Boxford Neighbourhood Plan web page:

www.boxfordsuffolk.com/boxford-neighbourhood-plan

The Pre-Submission Consultation Draft NDP and the accompanying supporting documents can also be viewed using this link.

As this is a formal stage, comments on the plan must be made using the response form and emailed to this email address. boxfordnp@gmail.com

Alternatively, you can download the form and print it and drop it off at the drop off point.

Lorne House, 7 Swan Street, Boxford, CO10 5NZ

Two drop-in exhibitions which will have more details about the proposed Neighbourhood Plan Policies are being held at the Village Hall as follows:

Thursday 8th July – 2pm – 8pm

Friday 9th July – 8am – 8pm

Hard copies of the Neighbourhood Plan can be viewed throughout the consultation period at the Post Office.

We are seeking your comments upon the draft policies and further information about the locations of hard copies of the documents and how to comment can be found on the Neighbourhood Plan website: www.boxfordsuffolk.com/boxford-neighbourhood-plan

Kind Regards

Neighbourhood Plan Steering Group

Appendix G: REG 14 Consultee List

MP for South Suffolk	James Cartlidge
County Cllr for Stour Valley Division	Suffolk County Council
County Cllr for Samford Division	Suffolk County Council
County Cllr for Cosford Division	Suffolk County Council
Ward Cllr to Box Vale	BDC
Ward Cllr to Assington	BDC
Ward Cllr to Brett Vale	BDC
Ward Cllr to Southeast Cosford	BDC
Parish Clerk to	Groton PC
Parish Clerk to ...	Kersey
Parish Clerk to ...	Polstead
Parish Clerk to ...	Assington
Parish Clerk to ...	Newton
Parish Clerk to ...	Edwardstone
BMSDC Community Planning	Babergh & Mid Suffolk DC
SCC Neighbourhood Planning	Suffolk County Council
Transport Policy	Suffolk County Council
Planning Obligations Manager	Suffolk County Council
HR Manager - SOR, Children and Young People	Suffolk County Council
Transport Policy	Suffolk County Council
Planning Obligations Manager	Suffolk County Council
	The Coal Authority
Area Manager, Norfolk & Suffolk Team	Homes & Communities Agency (HCA)
Land Use Operations	Natural England
Essex, Norfolk & Suffolk Sustainable Places Team	Environment Agency

East of England Office	Historic England
East of England Office	National Trust
Town Planning Team	Network Rail Infrastructure Limited
	Highways England
Stakeholders & Networks Officer	Marine Management Organisation
	Vodafone and O2 - EMF Enquiries
Corporate and Financial Affairs Department	EE
	Three
Estates Planning Support Officer	Ipswich & East Suffolk CCG & West Suffolk CCG
	Transco - National Grid
Consultant	Wood Plc (obo National Grid)
Infrastructure Planner	UK Power Networks
Strategic and Spatial Planning Manager	Anglian Water
	Essex & Suffolk Water
	National Federation of Gypsy Liaison Groups
	Norfolk & Suffolk Gypsy Roma & Traveller Service
	Diocese of St Edmundsbury & Ipswich
Chief Executive	Suffolk Chamber of Commerce
Senior Growing Places Fund Co-ordinator	New Anglia LEP
Strategy Manager	New Anglia LEP
Conservation Officer	RSPB
Senior Planning Manager	Sport England (East)
	Suffolk Constabulary
Senior Conservation Adviser	Suffolk Wildlife Trust
Director	Suffolk Preservation Society

	Suffolk Coalition of Disabled People
	Suffolk Preservation Society
	Landowners; owners of NDH and LGS
Community Development Officer – Rural Affordable Housing	Community Action Suffolk
Senior Manager Community Engagement	Community Action Suffolk

Appendix H: Regulation 14 Response Form



Pre-Submission (REG14) Consultation Response Form

Boxford Neighbourhood Development Plan (BNP)

8th July – 2nd September 2021

Please use this form to submit comments about the pre-submission draft Plan. We would prefer to receive responses using the form, which is available to download from the web site. If this is not possible then please complete this paper copy. Further copies are available at Boxford Post Office

Please submit your completed form in one of the following ways:

- 1) Email as an attachment to boxfordnp@gmail.com
- 2) Hand deliver as a paper copy to **Lorne House, 7 Swan Street, Boxford, CO10 5NZ**

The document being consulted on may be viewed online at: www.boxfordsuffolk.com/boxford-neighbourhood-plan or borrowed from Boxford Post Office

This public consultation begins on **8th July 2021** and will run for **8 weeks ending at midnight on 2nd September 2021**. Responses received after the closing date may not be considered.

Please expand the boxes as necessary or attach additional sheets. Clearly mark any **additional** sheets with your Name, details and the part of the Plan your comments relate to.

You do not have to answer every comment box but the more you tell us the more we can ensure the Plan represents local views. Please let us know about the things that are important to you.

NAME	
ADDRESS	

Boxford Neighbourhood Plan Consultation Statement January 2022

ORGANISATION / CLIENT YOU'RE REPRESENTING (Where applicable)	
YOUR EMAIL (optional)	

CONSULTATION RESPONSE <i>Please continue on a separate sheet if the box isn't big enough</i>	
I am generally in favour of the Plan	AGREE / DISAGREE
I would like to see changes to the Plan	AGREE / DISAGREE
General comments on the Plan	
Do you have any comments on Chapters 1 – 4?	YES / NO
Comment	
Do you agree with the Vision and Objectives of the Plan (Chapter 5)?	YES / NO
Comment	
Do you have any general comments on the Policies and Projects (Chapter 6)?	YES / NO
Comment	
Do you have any general comments on Chapter 7 – Housing?	YES / NO

Boxford Neighbourhood Plan Consultation Statement January 2022

Comment	
Do you agree with Policy BOX1 – Housing Strategy for Boxford?	YES / NO
Comment	
Do you agree with Policy BOX1A – Housing Allocation at Stone Street?	YES / NO
Comment	
Do you agree with Policy BOX2 – Housing Mix?	YES / NO
Comment	
Do you agree with Policy BOX3 – Rural Exception Sites?	YES / NO
Comment	

Do you have any general comments on Chapter 8 –A Transport Strategy for Boxford?	YES / NO
Comment	
Do you agree with Policy BOX4 – Safety for Vehicles, Pedestrians and Cyclists?	YES / NO
Comment	
Do you agree with Policy BOX5 – Improving Access and Connectivity?	YES/NO
Comment	
Do you agree with Policy BOX6 – New Village Car Park adjacent to the Primary School?	YES/NO
Comment	
Do you have any general comments on Chapter 9- The Built and Historic Environment	YES/NO
Comment	
Do you agree with Policy BOX7 – The Design of New Development?	YES/NO
Comment	

Boxford Neighbourhood Plan Consultation Statement January 2022

Do you agree with Policy BOX8 – Historic Environment and Conservation Area?	YES / NO
Comment	
Do you agree with Policy BOX9 – Non-Designated Heritage Assets?	YES / NO
Comment	
Do you agree with Policy BOX10 – Historic Views?	YES / NO
Comment	
Do you have any general comments on Chapter 10- Natural Environment?	YES/NO
Comment	
Do you agree with Policy BOX11 – The River Box Area of Local Landscape Sensitivity?	YES/NO
Comment	
Do you agree with Policy BOX12 – Important Public Scenic Views?	YES/NO
Comment	

Boxford Neighbourhood Plan Consultation Statement January 2022

Do you agree with Policy BOX13 – Protection and Enhancement of Natural Features	YES/NO
Comment	
Do you agree with Policy BOX14 – Local Green Spaces ?	YES/NO
Comment	
Do you have any general comments on Chapter 11 – Sustainability and Climate Change?	YES/NO
Comment	
Do you agree with Policy BOX15 – Localised Flooding?	YES/NO
Comment	
Do you agree with Policy BOX16 – Environmental Design?	YES/NO
Comment	
Do you have any general comments on Chapter 12 – Community Infrastructure?	YES/NO
Comment	
Do you agree with Policy BOX17 – Protection of Existing Services and Facilities?	YES/NO
Comment	

Boxford Neighbourhood Plan Consultation Statement January 2022

Do you agree with Policy BOX18 – Supporting new community infrastructure?	YES/NO
Comment	
Do you have any general comments on Chapter 13 – Business?	YES/NO
Comment	
Do you agree with Policy BOX19 – Support for small scale extensions to existing business?	YES/NO
Comment	
Do you agree with the Community Action Projects? (Page 28)	YES / NO
Comment	
Do you have any other comments?	

Thank You!

Appendix I: Regulation 14 Response Table – Community Consultees



Plan Para/Policy No	Respondent	Comments	SG Action
General	CABA	Agree overall with the Plan	Noted
General	WARREN	Excellent draft	Noted
General	WASPE	Agree overall with the Plan	Noted
General	HOWE	An excellent Plan – thank you	Noted
General	RULE	Agree overall with the Plan	Noted
General	CORNER	Agree overall with the Plan	Noted
General	SEXTON	Very well organised and thought through. Thank you	Noted
General	WOOD/RITCHIE	Thank you for all your efforts much appreciated	Noted
General	WILLS	Agree overall with the Plan	Noted
General	BONNY	Agree overall with the Plan	Noted
General	PHILLIPS	Agree overall with the Plan	Noted
General	MATTOCKS	Agree overall with the Plan	Noted
General	BEVEN	Agree overall with the Plan	Noted
General	HOUSE	Agree overall with the Plan. Best wishes for your efforts and hope you have a good support from Babergh, but I fear for the future in their hands	Noted
General	LEWIS	Agree overall with the Plan	Noted
General	FOSTER	Generally in favour of the Plan. 5 years too late but better late than never!	Noted
General	DAVIES	Agree with the Plan	Noted

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		Many thanks to all those involved in preparing a presenting the plan, with which I am in general agreement. I'm finding it difficult to identify which boxes I should use for my very few comments, so I'm using the 'any other comments' at the end.	
General	GRAY	I am generally in favour of the Plan	Noted
General	GRAY	There is undue emphasis on the need for a village car park and the means by which it is proposed to be achieved are flawed. Furthermore the location chosen for the proposed car park is unsuitable for such use being on flood control wetland. Not only will the car park be difficult and expensive to build and maintain, but it will also cause significant run off directly into the river causing increased flood risk and pollution.	The proposed location of the village car park is the same as that previously identified in the Local Plan. It is acknowledged that there are flood risk issues in the area however these should be addressed at a detailed stage. Consultation and conversations to date had highlighted the need for a car park near to the school.
General	STRAFFORD	I agree with the plan	Noted
General	GREGG	An excellent document that cannot come soon enough. A big thank you to those who have been involved in preparing the Neighbourhood Plan	Noted
General	EAST	I found reading this document really interesting and have learnt a lot about the village and its history. I hope my comments will be considered as I only want what is best for the village. I sincerely believe that the current proposals for Stone Street Road have not been well thought out and, although I agree a car park is needed, I think the current location is wrong and will not improve the situation – highly likely making it worse. I guarantee many people will still park along the roads and ignore the car park unless there are double yellow lines (not an attractive prospect for a medieval village) with regular wardens. I appreciate that there is no easy solution for the traffic issues however I think we should be looking at ways of encouraging people to avoid driving into the village first and foremost. I also think building houses	<p>The proposed location of the village car park is the same as that previously identified in the 2008 Babergh Local Plan.</p> <p>It is important that the car park is in a location where it is safe, convenient and likely to be used.</p> <p>The allocation on Stone Street Road – which will be corrected</p>

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		right up along Stone Street Road will potentially ruin the village aesthetics that we are all trying to maintain and will further increase traffic congestion. I am also seriously concerned about an increased risk of flash flooding if adequate drainage systems are not put in place for the proposed building work along Stone Street Road (that is, if you mean Stone Street Road, not Stone Street!).	in the next version of the plan is for 7 dwellings only. These are to enable to car park to come forward. Policy BOX1, and Map 7 make it clear the reference is to Stone Street Road . References in BOX1A require amending
General	RANDS	Agree with the Plan	Noted
General	RANDS	A very impressive piece of work . I have no specific thoughts to add. Thinking Sand Hill is it possible to expedite . Does it have any relevance in opposing Sand Hill prior to adoption?	Noted. The Neighbourhood Plan has no weight in the determination of planning applications prior to Examination stage.
General	RANDS	Interesting historical summary	Noted
General	BARNETT	Relating to Stone Street Road, Lack of thought around safety where the road is narrow. Road not suitable for more traffic. Car park specification ambiguous (how many cars, surface type etc..), who will maintain it, or will it end up overgrown like the footpath on Stone Street? Seven houses and car park proposed on a flood plain, the same area where excess water from rectory park and my own property runs off. Will cause surface flooding to my property. You should be identifying other possible parking areas such as extending the playing field car park. Permit holders on Swan street will cause additional parking issues on Homefields and Daking Ave because no-one is going to walk from the beyond the school to past the butchers with groceries etc. Permit holder section will island the butcher's shop if there is no customer parking. Lots of confusion between Stone Street Road and Stone Street in the plan and this response form.	References to Stone Street Road will be corrected in the next version of the Plan. Concerns over floodrisk are acknowledged and the plan will be informed by comments from the statutory consultees on this issue. The location of the car park is the same as that in the adopted Local Plan. An extended car park at the playing field would not address the car parking issues related

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			to the school and the village hall.
General	PARTRIDGE	The plan needs to be more specific about how the requirements for affordable housing will be fulfilled. Much of the current housing stock is beyond the reach of many local residents, particularly younger people.	Noted. We will address this in the next version using consultee feedback.
Chapters 1-4	BARNETT	Lovely insight into the history of Boxford.	Noted.
Chapters 1-4	GRAY	These chapters seem to be well researched and presented and I commend the steering group for its efforts in this regard.	Noted
Vision and Objective	BARNETT	Re-word objective 2 as follows: To support initiatives that ensure safe vehicular and pedestrian access to the village centre. I don't really understand what is meant by developments. Initiatives could be footpaths, a 20mph limit in the village centre or a car park. It's more adaptable.	The Neighbourhood Plan must be concerned with land use matters and therefore the objectives need to relate to development however, initiatives and projects are also covered in the plan.
Vision and Objectives	GRAY	The Vision and Objectives pay tribute to the aesthetic qualities of "the character of the Conservation Area" and "the scenic beauty of the wider landscape" but pay insufficient attention to the importance of maintaining the natural environment in terms of plant and wildlife and the challenges thereto from climate change.	Noted. There is a specific policy on wildlife and also on sustainability and climate change.
Vision and Objectives	PARTRIDGE	I agree with the objective "to provide for housing growth of all tenures and sizes to meet the needs of the current and future generations". It is important to ensure that suitable and affordable homes are created for everyone, in particular the younger generation and to allow older residents to downsize and remain in the parish. This objective could be met by the building of the proposed houses at Sand Hill, which many local people are supportive of, particularly younger people who want to remain living in the area but for whom there is currently no opportunity for them to do so.	Comments noted. The application at Sand Hill lies outside of the Neighbourhood Plan at this stage as the plan is not sufficiently advanced to influence it.
Policies and Projects	EAST	There is reference to a car park being built in 'Stone Street' not Stone Street Road.	Noted, This will be corrected

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<p>Policies and Projects</p>	<p>BARNETT</p>	<p>Additional village car park: not suitable on Stone Street Road, The gap past the school is too narrow for two vehicles to pass and there is no refuge for pedestrians, site continuously floods and will need substantial draining and building up, the result of which will be flooding further down the river, Stone Street etc. People will always park as close as they can to the school and shops. The car park will be a waste of money which will destroy a biodiverse often overlooked part of the village. I would also be concerned about security in the proposed car park.</p> <p>Green footpath. No-one is going to use this unless it is maintained. The footpath on Stone Street Road is unpassable through most of the summer due to it being overgrown. Stone Street Road is a lovely quiet road to walk down and is a direct route into the village. The proposed green footpath is a long way into the village although I'm sure it will be very pretty.</p> <p>Could the car park be extended at the playing fields along with the rejuvenation of the Croft public footpath? This would be a fantastic low-cost solution to parking in the village and is about the same walking distance as the proposed car park on Stone Street Road. Parking restrictions on Swan Street will improve access to the playing field car park.</p> <p>The long-term plan should be to build a new environmentally friendly, village hall with modern facilities at the playing fields that can provide a hub for the community. Extending the existing car park up the disused slope will provide ample parking. The Hall could be of a high standard so could be used for weddings etc. The existing site of the village hall could then be turned into a smaller car park for the Church and School. Without the village hall on Stone Street Road there would be less vehicles during peak times.</p>	<p>The proposed car park is in the same location as the allocation in the existing Local Plan. Its purpose is to try to alleviate car parking and congestion issues associated with the school. It could also benefit the village hall. It therefore needs to be close to both in order to be safe and convenient for this purpose.</p> <p>A car park further away would not address the issue.</p> <p>It is acknowledged that there is floodrisk in the area however this can be addressed by the detailed design and be informed by the comments of the relevant statutory consultees.</p> <p>Noted. However there has been considerable investment in the Village Hall in recent years including internal alterations and refurbishment. Moving the Village Hall to the playing fields is greater walking distance to the centre of the village than the existing</p>
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			distance from the village centre to the village hall. This could lead to journeys being made by the car and could lead to greater congestion and traffic issues on Homefields , where issues are already being experienced.
Policies and Projects	GRAY	<p>Project 1. New Village Car Park in Stone Street: the chosen location for the proposed car park is unsuitable being on flood control wetland. Not only will the car park be difficult and expensive to build and maintain, but it will also cause significant run off directly into the river causing increased flood risk and pollution. Furthermore, there is no obvious safe pedestrian route to the village centre, particularly if the proposed development takes place, increasing the vehicle movements more than threefold through the pinch point in front of numbers 1 and 3 Stone Street Road. The plan itself admits that "it would be preferable to deliver a car park in the centre of the village." A better location, therefore, would be a small part of Taylors Field to the east of the Croft and south of the playing field.</p> <p>Project 2. New Green footpath ...: This starts in the middle of the car park referred to in Project 1 with no obvious safe pedestrian route to the village centre and ends at a busy junction with no safe pedestrian route from there to the start of the permissive path. In its proposed form, it cannot possibly be referred to as a link to the Stone Street hamlet and certainly does not qualify as "safe pedestrian connectivity between the school and Stone Street hamlet."</p> <p>Projects 2, 3 and 5 pay lip service to the environment and do nothing but provide three small areas that look pretty.</p> <p>Project 6 is sensible and highly commendable.</p>	<p>The car park is proposed to be next to the school to mitigate school traffic at peak time and enable safe route to school. A direct path from the car park to the school as suggested by Suffolk County Council would mean a safer route. The alternative location for the car park proposed by the respondent would not address the school traffic issues.</p> <p>This proposed route makes use of the existing underpass under the A0171 which would then enable a safer route to Stone Street hamlet.</p>

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		Project 7 is complete nonsense. It says nothing, does not make grammatical sense and there is no explanatory paragraph as with the other "Projects."	Noted. No change Noted Agree this would benefit from an explanatory paragraph. Paragraph to be added accordingly.
Housing Policies	CABA	Agree	Noted
Housing Policies	WARREN	Agree	Noted
Housing Policies	WASPE	Agree	Noted
Housing Policies	HOWE	Agree	Noted
Housing Policies	RULE	Mostly Agree	Noted
Housing Policies	CORNER	Mostly agree	Noted
Housing Policies	WOOD/RITCHIE	Mostly agree	Noted
Housing Policies	WILLS	Agree	Noted
Housing Policies	BONNY	Agree. No mention of potential of self-build. Greater emphasis should be on sustainability	Noted. This was not a strong element of the Housing Needs Study or consultation to date
Housing Policies	PHILLIPS	Agree	Noted
Housing Policies	MATTOCKS	Agree	Noted
Housing Policies	BEVEN	Mostly agree. New housing should be built in a Suffolk style rather than endless red brick, and with environmental elements like solar panels, ground source heating etc	Noted. See Design Policy and Design Code
Housing Policies	HOUSE	It is right to consider the implications of local development on existing residents. Something lacking in Babergh's decision making.	Noted
Housing Policies	LEWIS	Mostly agree	Noted
Housing Policies	FOSTER	Agree – need a balanced housing mix	Noted
Housing Policies	GREGG	Agree	Noted
Housing Policies	RANDS	Agree	Noted

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Housing Policies	GRAY	in general, this makes sense and demonstrates quite clearly that Boxford's new housing obligations have already been exceeded. It then clearly shows the settlement boundary and explains the conditions for development outside of that boundary before making an unnecessary proposal in Boxes 1 and 1A that breach those conditions (see below).	Noted. The allocation in Policy BOX1A is to enable the delivery of the car park which although an allocation in the existing Local Plan has yet to come forward.
Chapter 7 Housing	SEXTON	With reference to Map 5 Calais Street. Site SS0403, the site LSO1 has been in the Babergh DC Local Plan for a ribbon/linear development of 5 houses, there is now reference to an extension to this application (SS0922) which is new and would provide a greater access and a non-linear development out of keeping with Calais Street. We have also seen the landowner stake out substantially more land reaching someway down Wash Lane. Please could you make reference to SS0922 as a rejected plan.	Noted. The site is not proposed in the Neighbourhood Plan nor is the extension proposed in the Local Plan .
Chapter 7 Housing	RANDS	The key element of the plan impressively researched and analysed . I am in full agreement. It is essential to protect the village from exploitative commercial development	Noted
Housing Policies	EAST	Again, multiple times 'Stone Street' is referenced instead of 'Stone Street Road'.	Noted. This will be corrected
Policy BOX1 Housing Strategy	FOSTER	Sandhill <input checked="" type="checkbox"/> Stone Street <input checked="" type="checkbox"/> Gives possible footpath to school	Noted
Policy BOX1	RANDS	A coherent policy for the benefit of future generations. You doubt the scope for small scale multiple occupation i.e. flats for the younger generation/renters?	Noted
Policy BOX1	GRAY	This states that "New development in Boxford will be focused within the defined settlement boundaries" and that "New development outside of the defined settlement boundaries will not be supported except for specific purposes." It then gives examples of specific purposes: meeting a need for affordable housing (not proven), the conversion of an existing building (none present), or is essential for the operation of agriculture horticulture, forestry or outdoor recreation	The proposed allocation is to bring forward the car park. The settlement boundary will be moved to include the site and therefore is consistent with the policy.

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		(not proven). It then proposes a development outside of the settlement boundary with no specific purpose offered.	
Policy BOX1	EAST	Again, it refers to 'Stone Street' which is incorrect.	Noted. This will be corrected
Policy BOX1A – Allocation	EAST	<p>Again, reference to 'Stone Street' and then refers to access via 'Stone Street Road' - very misleading!</p> <p>Firstly, I am concerned about the location of the proposed car park. Stone Street Road is a very narrow road where residents also need to park their cars, making it even narrower. At certain times of the day there are a high level of pedestrians due to there being a village hall, a school and a nursery all in the same small area. A car park would increase traffic flow along this road considerably, especially if you include large vehicles like buses. I am struggling to comprehend how large buses will successfully navigate such a narrow lane where pedestrians also have to walk.</p> <p>One suggestion might be to create a one-way route with a separate exit and entrance to try to avoid this. However, I am also concerned that encouraging traffic along Stone Street Road would actually do more harm than good as children trying to access the school and nursery on foot would face ever increasing levels of traffic and potential road hazards. I think there should be more done to encourage people to walk into the village rather than rely on car. Unfortunately, I'm certain people will still park along that road, regardless of the car park, thus making the situation far worse than ever before.</p> <p>Secondly, I feel having a car park right next to a nursery and a conversation area is a major concern in terms of traffic pollution. Also, There is no clear mention of how large the car park will be, how many cars it will hold or what it will look like. Will it just be a concrete area, or will it blend in more sympathetically with its surrounds?</p> <p>Thirdly, the housing development proposed along Stone Street Road is currently suggested as having the houses face the road. Surely it would be better to have the houses face the river and have the gardens back</p>	<p>Reference will be corrected.</p> <p>The car park is an existing allocation within the adopted Local Plan It has yet to come forward and the allocation for housing is to encourage it to do so.</p> <p>The car park is required to deal with peak traffic problems at school/nursery pick up and drop off. An alternative location in the village would be less likely to be used by parents as it would be less convenient.</p> <p>Current arrangements with on street parking are unsafe and also cause potential pollution problems</p> <p>The design of the car park will be important due to its position and proximity to the Conservation Area</p>

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		<p>onto the road? Cars belonging to those properties could then access the houses near the car park entrance thus avoiding an increase in car traffic in a narrow and dead-end lane. Stone Street Road is currently a very attractive narrow village lane which people enjoy walking along. I feel it would be ruined (not to mention a parking nightmare) if it became lined with new houses and cars. If houses are also built further up this road, I am concerned that the road will become extremely busy and a logistical nightmare.</p> <p>Additionally, there is the major issue of flooding. A huge amount of groundwork would be needed before any houses could be built on that land. Other than the water from the river, all rainwater from up on higher land flows down to that land and I am also concerned that the current land surrounding the houses would suffer flash flooding as a result of the new builds.</p> <p>Further, there is a lot of road noise from the A1071 so people looking to buy properties on that stretch of land would need to take that into consideration and perhaps make them less desirable</p>	<p>The issue of floodrisk will need to be a factor in the detailed design of the car park.</p>
Policy BOX1A	GRAY	<p>From the way that the seven houses and the car park are so closely linked and from my own personal conversations with the landowner it is clear that a deal has been struck. The landowner will only allow the development of a car park if the council supports his application for planning permission for seven dwellings. This is an inappropriate example of a "specific purpose."</p>	<p>The housing allocation is specific to the delivery of the car park – one cannot come forward without the other due to the complexities of the development of both. As an allocation the settlement boundary will be moved to include the site and therefore Policy BOX3 is not enacted.</p>
Policy BOX1A	BARNETT	<p>I note 7.12 'Over 58% of respondents felt that new development should not be allowed to take place outside of the 'village envelope'. Preferences for 'infilling' and small developments of up to 5 new dwellings were the most preferred form for new development.' Proposed development on Stone Street Road would contravene this.</p>	<p>The rationale for the development is set out in the plan. It is required to bring forward the car park. One cannot happen without the other.</p>

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		<p>Obviously seven affordable dwellings will not be possible on Stone Street Road due to the plan's requirement for a car park as part of the planning application, therefore substantial houses will need to be built to make the project viable. The houses will need to be built close to the road to keep them out of the flood zone. This will be unsightly and will ruin the aesthetics of the farmworker's cottages.</p> <p>Some thought will be needed to address the properties overlooking the private gardens which run along the road (See Box 7 'Density and Building Heights' 'd').</p> <p>I'm going to assume this is Stone Street Road.</p> <p>a) The car park specification is ambiguous. Number of spaces, type of surface, who will maintain it, will it be adopted by the LA?</p> <p>b) Vehicular access, one access point for all the houses and the car park? Please clarify.</p> <p>d) Will the flood risk also take into account existing properties?</p> <p>e) Pedestrian link unnecessary, Stone Street Road is a beautiful and popular route to the village, maybe some additional speed signs on the 1071 would make the crossing safer although I do not know of any instances of pedestrians being hit by cars in the past 15 years.</p> <p>f) You should be supplying a specification, or you'll end up with a car park that is not fit for purpose.</p> <p>g) Additional screening on the west boundary to clearly differentiate between the existing Farmworkers cottages on Stone Street Road and the new development.</p> <p>Can you clarify the plan for Bell House during the re-development?</p>	
Policy BOX2 Housing Mix	FOSTER	Houses/Bungalows <input checked="" type="checkbox"/> But more pressure on school and Drs?	Noted

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Policy BOX 2 Housing Mix	EAST	As long as it is tastefully done, and the houses blend well and complement the village! Do we have much say in the matter? Will we see plans before building?	Noted. An application will need to be submitted seeking planning permission and therefore the plans will be public at that time.
Policy BOX 2 Housing Mix	GRAY	I agree with what it says about the mix. However, the plan clearly indicates that no new housing is required.	The Housing Needs Assessment indicates that there is still a need.
Policy BOX2 Housing Mix	BARNETT	All areas should be a mix of housing. Areas of purely affordable housing does not integrate people into the community	Noted.
Policy BOX 3 – Exception Sites	RANDS	Agree although I envisage this to be vulnerable to abuse	Noted
Policy BOX 3 – Exception Sites	GRAY	Boxford's housing needs can be satisfied within the settlement boundary. For this policy to be valid any housing needs assessment needs to show not only that a local need exists but also that it cannot be accommodated within the settlement boundary.	Noted. However for affordable housing to come forward and to remain as affordable housing in perpetuity it will need to be granted on an exceptional basis outside of the settlement boundary. Sites within the settlement boundary will be more likely to be open market housing.
Policy Box 3 Exception Sites	BARNETT	All areas should be a mix of housing. Areas of purely affordable housing does not integrate people into the community	Noted. Agreed that it is preferable for all tenures to be closely integrated.
Transport Strategy	CABA	Agree	Noted
Transport Strategy	WARREN	Agree	Noted
Transport Strategy	WASPE	Mostly agree	Noted
Transport Strategy	HOWE	Agree	Noted
Transport Strategy	RULE	Mostly agree	Noted
Transport Strategy	CORNER	Mostly agree	Noted
Transport Strategy	WOOD/RITCHIE	Mostly agree	Noted

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Transport Strategy	WILLS	Agree	Noted
Transport Strategy	BONNY	Mostly agree	Noted
Transport Strategy	PHILLIPS	Agree	Noted
Transport Strategy	MATTOCKS	The reduction in public transport may be difficult to reverse now.	Noted
Transport Strategy	HOUSE	I have raised speed limitation to BPC in respect of the approach roads to and including the centre of the village, plus speed limits to housing estates.	Noted
Transport Strategy	BEVEN	Mostly agree	Noted
Transport Strategy	LEWIS	Mostly agree	Noted
Transport Strategy	FOSTER	Ok at mo	Noted
Transport Strategy	GREGG	Agree	Noted
Transport Strategy	RANDS	Agree	Noted
Transport Strategy	BARNETT	'pedestrians and motor cars compete for the limited road and pavement space' I can't recall ever seeing cars on the pavement.	Noted
Transport Strategy	GRAY	Particularly with regard to pedestrian access, Stone Street Road south of the school has been ignored. There are only a handful of homes, and it is not a through route but there are no footpaths at all and the section immediately adjacent to the school outside numbers 1 and 3 is particularly narrow. Furthermore, during the school run, traffic is generally heavy, and it is surprising, perhaps, that there have been no major injuries to date.	There is a proposal to use the path under the underpass to provide a longer pedestrian route.
Policy BOX4 – Access and Connectivity	RANDS	I support 20mph within Boxford . Regarding signage concerns (8.3) simply replace 30mph signs	Noted
Policy BOX 4 Access and Connectivity	GRAY	The box should highlight Church Street AND Stone Street Road, at least as far as the bypass and probably to the hamlet itself rather than limiting itself to the junction	The part of the policy is specifically aimed at highlighting issues at junctions.
Policy BOX5 Improving Access	FOSTER	Just a turning area re school?	Noted. Suffolk County Council have made comments in respect of the need for safe turning

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Policy BOX 5 Improving Access	BARNETT	Any new and existing car parks should have EV charging points	The provision of electric charging points is covered in the policies.
Policy BOX5 Improving Access	DAVIES	<p>I can see no provision for disabled parking. Given the age profile of the population I think this needs consideration. Not just in the proposed car park, but also on the street near the shops and post office.</p> <p>Public benches would be helpful to less mobile residents of the village, again in the centre, near the bus stop and shops/post office. This would enable them to rest between their outward and inward journeys, if walking, and provide somewhere sit outside in the centre of the village to 'watch the world go by'.</p> <p>In general it is not clear what thought has been given to residents and visitors with mobility difficulties outside their homes.</p>	<p>There is no specific proposals for disabled parking, however this issue is included within the Suffolk Parking Guidelines and therefore provision will need to be made. It therefore does not have to be repeated in the Plan.</p> <p>Suffolk County Council have asked for amendments to Policy BOX18 to reflect the needs of disabled people. .</p>
Policy BOX6 Car Park	EAST	See previous comments. I think the suggested location will only cause more problems rather than solve them.	See responses above.
Policy BOX6 Car Park	RANDS	Agree in principle although the location is probably the best available. (assuming the White Hart grounds are not) I question whether it would be much used except church/choir events	Noted. It is anticipated that the car park will be used in conjunction with the school and village hall
Policy BOX6 Car Park	BARNETT	The car park will not achieve its main objectives. People will still park as close as they can to the school, this will result in the road being blocked as it currently is. A bus will struggle to fit through the gap between number 1 and the graveyard unless double yellow lines are painted in front of the existing properties. There is no footpath so people parking in the new car park will then need to navigate past two-way traffic with no refuge. As there is no footpath, people exiting the existing houses (#1 & 3) will be walking straight onto the road into two-way traffic.	A footpath link from the car park to the school can be provided to negate the need for people to walk along Stone Street Road.

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Policy BOX 6 – Car Park	GRAY	As above, this is an unsuitable location, both for environmental reasons and for pedestrian safety.	The current situation presents congestion, safety and pollution problems and therefore the car park is proposed to address these.
Built and Historic Environment Policies	CABA	Mostly agree	Noted
Built and Historic Environment Policies	WASPE	Agree	Noted
Built and Historic Environment Policies	WARREN	Agree	Noted
Built and Historic Environment Policies	HOWE	Agree	Noted
Built and Historic Environment Policies	RULE	Agree	Noted
Built and Historic Environment Policies	CORNER	Mostly agree	Noted
Built and Historic Environment Policies	WOOD/RITCHIE	Mostly agree	Noted
Built and Historic Environment Policies	WILLS	Agree	Noted
Built and Historic Environment Policies	BONNY	Agree	Noted

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Built and Historic Environment Policies	PHILLIPS	Agree	Noted
Built and Historic Environment Policies	MATTOCKS	Agree	Noted
Built and Historic Environment Policies	BEVEN	Mostly agree	Noted
Built and Historic Environment Policies	HOUSE	Agree. All historic buildings and sites to be protected	Noted
Built and Historic Environment Policies	LEWIS	Mostly agree	Noted
Built and Historic Environment Policies	GREGG	Agree	Noted
Built and Historic Environment Policies	RANDS	Agree	Noted
Policy BOX7 - Design	FOSTER	Boxford should maintain its village character. Too much development will destroy that, and the place will become suburban sprawl	Noted.
Policy BOX7 - Design	BARNETT	Green spaces and landscaping: L & N are the same	Green Spaces refers also to small recreation or amenity areas which will be used by people. Landscaping includes tree planting and buffer strips. They are quite different.
Policy BOX 9 NDHA	RANDS	Inevitably subjective but no problems for me.	Noted
Policy BOX 10 Historic Views	BARNETT	agree in principle however:	Noted. This should refer to Stone Street

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		10 'Green Entrance at Stone Street Road – The picture is not of Stone Street Road.	
BOX10 – Historic Views	EAST	What about the historic views along Stone Street Road? My house is 1840s and the lane is (currently) beautiful and historic yet no photos were taken.	This view is not considered to be in the same category as the other views
Natural Environment Policies	CABA	Mostly agree	Noted
Natural Environment Policies	WARREN	Agree	Noted
Natural Environment Policies	WASPE	Agree	Noted
Natural Environment Policies	HOWE	Agree	Noted
Natural Environment Policies	RULE	Agree	Noted
Natural Environment Policies	CORNER	Mostly agree	Noted
Natural Environment Policies	WOOD/RITCHIE	Agree	Noted
Natural Environment Policies	WILLS	Agree	Noted
Natural Environment Policies	BONNY	Mostly agree	Noted

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Natural Environment Policies	PHILLIPS	Agree	Noted
Natural Environment Policies	MATTOCKS	Agree	Noted
Natural Environment Policies	BEVEN	Mostly agree	Noted
Natural Environment Policies	HOUSE	Agree	Noted
Natural Environment Policies	LEWIS	Mostly agree	Noted
Natural Environment Policies	FOSTER	General support for the Natural Environment Policies	Noted
Natural Environment Policies	GREGG	Agree	Noted
Natural Environment Policies	RANDS	Agree	Noted
Natural Environment Policies	GRAY	Could go further in terms of the plants and wildlife; it shouldn't only be about aesthetics. 10.14 Primrose Wood, though important, is not the only important site, e.g. land in Stone Street Road, land to the east of Butchers Lane and the Spinney.	Policy BOX 13 deals with natural features including wildlife and habitats. Primrose Wood is a County Wildlife Site
Policy BOX 11- Area of local Landscape sensitivity	FOSTER	Too late for view 6! Also too late for the view from Fox (PH) Huge white roof (new build), School Hill	It is acknowledged there is an application pending determination that would affect this view. If the

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			application is approved prior to the Neighbourhood Plan being 'made' then this will be removed
Policy BOX 11- Area of local Landscape sensitivity	GRAY	There should be a part c) that deals with maintaining the health and diversity of the plant and wildlife, not just how it looks.	This policy is a landscape protection policy. There is another policy relating to wildlife and biodiversity.
Policy BOX12 Scenic Views	BARNETT	7. A view across a field onto new houses is not something that requires protection. This looks like a veiled attempt to prevent further house building on Station Fields Stone Street Road should be added to this list at the point where the South Suffolk A3 Cycle Route enters the village via the footpath from the 1071. You have a fantastic view of the Farmworkers Cottages with views across the fields before coming to the church. See appendices A.	It is acknowledged there is an application pending determination that would affect this view. If the application is approved prior to the Neighbourhood Plan being 'made' then this will be removed
Policy BOX13] Natural Features	EAST	Despite there being allowance for some land to be left untouched, I believe building houses on the land adjacent to Stone Street Road will cause irreparable damage to existing plants and wildlife not to mention increased potential for flash flooding.	Noted. The issue of floodrisk will be considered in the context of comments from statutory consultees.
Policy BOX14 – Local Green Spaces	BARNETT	As Stone Street Road Pasture is going to be designated as a local green space does that mean you will not be building houses and a car park there? I think you mean Stone Street Pasture. Map and Box 14 needs updating.	Noted. The reference is to Stone Street Pasture – the map clearly shows the LGS related to land south of the A1071.
Policy BOX14 – Local Green Spaces	GRAY	Area k) Stone Street Road Pasture extends all the way to the school.	The area show as LGS is south of the A1071. An area north of the A1071 is shown on map 7 on page 38 as an area of open space and nature conservation.

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Sustainability and Climate Change Policies	CABA	Disagree	Noted
Sustainability and Climate Change Policies	WARREN	Agree	Noted
Sustainability and Climate Change Policies	WASPE	Agree	Noted
Sustainability and Climate Change Policies	HOWE	Agree	Noted
Sustainability and Climate Change Policies	RULE	Agree	Noted
Sustainability and Climate Change Policies	CORNER	Mostly agree	Noted
Sustainability and Climate Change Policies	WOOD/RITCHIE	Agree	Noted
Sustainability and Climate Change Policies	WILLS	Agree	Noted
Sustainability and Climate Change Policies	BONNY	Mostly agree. Minimal use of tarmac etc around new builds to reduce flooding	Noted
Sustainability and Climate Change Policies	PHILLIPS	Agree	Noted
Sustainability and Climate Change Policies	MATTOCKS	Agree	Noted

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Sustainability and Climate Change Policies	BEVEN	Mostly agree	Noted
Sustainability and Climate Change Policies	HOUSE	Agree	Noted
Sustainability and Climate Change Policies	LEWIS	Mostly agree	Noted
Sustainability and Climate Change Policies	FOSTER	General support for policies	Noted
Sustainability and Climate Change Policies	GREGG	Agree	Noted
Sustainability and Climate Change Policies	RANDS	Agree	Noted
Sustainability and Climate Change Policies	GRAY	This chapter appears not to appreciate importance of the flood control wetland to the east of Stone Street Road, north of the A1071.	The flood maps in the plan are to be updated following responses from statutory consultees
Policy BOX15 Localised Flooding	EAST	A huge amount of groundwork would be needed before any houses could be built on that land. Other than the water from the river, all rainwater from up on higher land flows down to that land and I am also concerned that the current houses would suffer flooding as a result of the new builds (especially if you also plan to build on sand hill as well!) I'm sure when I bought my house, I had heard there were houses on that strip of land in the 1800s which then collapsed due to the ground being unsuitable. A recent article in 'The Guardian' raised the issue of increased flash flooding as the climate crisis worsens with lack of green spaces and inadequate drainage solutions only adding to this problem.	Noted. The issue of floodrisk in this area will be explored with the relevant statutory consultees. Detailed plans will need to ensure against increasing floodrisk elsewhere as required by Policy BOX15.

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		<p>If planning permission is granted, I would therefore like written reassurance that adequate drainage solutions are put in place and the promise of compensation if the building work leads to the flooding in and around the properties currently on Stone Street Road.</p> <p>Why does the map showing localised flooding on page 93 not show Stone Street Road? In this email, I attach a map that shows current flood risks in Boxford and it clear there. I also attach a link to a news article that highlights the dangers of building on or near flood plains.</p>	
Policy BOX 15 Localised Flooding	BARNETT	<p>However, This map needs to show the area around Stone Street Road where 7 houses and a car park are proposed. As this is the main objective of the village plan it needs to be shown on this map.</p>	The flood maps are to be updated following responses from statutory consultees.
Policy BOX16 Environmental Design	FOSTER	If available – e.g. heat pumps – not a present	Noted
Community Infrastructure Policies	CABA	Mostly agree	Noted
Community Infrastructure Policies	CORNER	Agree	Noted
Community Infrastructure Policies	WOOD/RITCHIE	Mostly agree	Noted
Community Infrastructure Policies	WILLS	Agree	Noted
Community Infrastructure Policies	WARREN	Agree	Noted
Community Infrastructure Policies	WASPE	Agree	Noted

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Community Infrastructure Policies	HOWE	Agree	Noted
Community Infrastructure Policies	RULE	Mostly agree	Noted
Community Infrastructure Policies	PHILLIPS	Agree	Noted
Community Infrastructure Policies	MATTOCKS	Agree	Noted
Community Infrastructure Policies	BEVEN	Mostly agree	Noted
Community Infrastructure Policies	HOUSE	Community needs to be encouraged to be involved if not by passage of time committees and activities will cease. Current problem in village hall.	Noted.
Community Infrastructure Policies	LEWIS	Mostly agree	Noted
Community Infrastructure Policies	GREGG	Agree	Noted
Community Infrastructure Policies	FOSTER	General Support for these policies	Noted
Community Infrastructure Policies	RANDS	Agree	Noted
Community Infrastructure Policies	PARTRIDGE	Agree	Noted

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Policy BOX18 Community Infrastructure	BARNETT	new village hall at the playing fields could house community provisions and meeting rooms as well as a space that could be hired out for parties etc. As previously stated, I don't agree with the proposed Car park location on Stone Street Road. If the school itself requires more car parking it should look at its existing arrangements and create more spaces.	See response to comments above in respect of the car park
Policy BOX18 Community Infrastructure	EAST	Yes and no. I agree there needs to be a car park. Just not at the proposed site as I think it will only make the current situation worse. Is the current village hall listed? If not, could that land be turned into a car park with access via School Hill and then a new and improved village hall be built somewhere better suited? Something that could be hired out for a multitude of events and bring in a lot more money to the community? I worry that the current proposal seems a bit of a 'quick fix'	Noted. However there has been considerable investment in the Village Hall in recent years including internal alterations and refurbishment. Moving the Village Hall to the playing fields is greater walking distance to the centre of the village than the existing distance from the village centre to the village hall. This could lead to journeys being made by the car and could lead to greater congestion and traffic issues on Homefields , where issues are already being experienced.
Business Policies	CABA	Mostly agree	Noted
Business Policies	WARREN	Agree	Noted
Business Policies	WASPE	Agree	Noted
Business Policies	HOWE	Agree	Noted
Business Policies	RULE	Mostly agree	Noted
Business Policies	CORNER	Agree	Noted
Business Policies	WOOD/RICHTIE	Mostly agree	Noted
Business Policies	WILLS	Agree	Noted
Business Policies	PHILLIPS	Agree	Noted

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Business Policies	MATTOCKS	Agree	Noted
Business Policies	BEVEN	Mostly agree	Noted
Business Policies	HOUSE	Agree. We need businesses to thrive and also the school or else Boxford will just be residential stock	Noted.
Business Policies	LEWIS	Mostly agree	Noted
Business Policies	FOSTER	General support for these policies.	Noted
Business Policies	GREGG	Agree	Noted
Business Policies	RANDS	Agree	Noted
Business Policies	PARTRIDGE	Agree	Noted
Community Projects	EAST	See my previous comments (and comments below) about the proposed car park.	See responses above in relation to the car park
Community Projects	BARNETT	<p>1. Again, assuming this means Stone Street Road. Expansion of Playing Fields car park needs to be fully assessed as a more practical safer alternative.</p> <p>2. Indirect route to the village, not really needed as Stone Street Road is a nice road to walk down</p> <p>3. Yes this should improve so the playing fields car park can be used for people accessing the village.</p> <p>4. Does the brickwork actually need refurbishing?</p> <p>5. Good idea as long as it is properly funded and maintained.</p> <p>6. Survey should be completed prior to revising the village plan. I'm guessing the plan can't be changed mid-way to reflect the need.</p>	<p>Reference should be to Stone Street Road although the later title for Map 7 is correct.</p> <p>It is not a pleasant walk at peak times due to traffic congestion and safety issues. The proposal provides an alternative route Noted</p> <p>It has been highlighted that it does Noted The survey will inform reviews of the Plan.</p>

Appendix J : Regulation 14 response table: Statutory Consultees

Series	Paragraph or Policy Number	Respondent	Response	(Suggested) Working Group Response	Action
1	General	BDC	<p>Thank you for consulting Babergh District Council on the Regulation 14 Pre-Submission Draft Boxford Neighbourhood Plan. This letter and the appended ‘Table of Comments’ represents our formal response.</p> <p>The hard work that has gone into getting the Plan to this stage is clear. We also acknowledge the regular engagement you have had with us and thank you for the opportunity to provide informal feedback on an earlier draft version of this Plan. It is clear that this has been acted on. Some further work is still needed, but this is mostly to aid clarity and to address some formatting issues etc.</p> <p>We do, however, draw you attention in particular to our comments relating to the settlement boundary (as shown on various maps), to Table 2, to Policy BOX 2: Housing Mix, and to matters relating to Local Green Space Policy BOX 14 and Appendix B. P</p> <p>Perhaps, with the exception of BOX 2, these and the other points we raise should all be relatively easy modifications. We have also prepared a table of minor editing matters. These do not form part of our formal response, but we trust they will be helpful.</p> <p>You will also be aware of the revised National Planning Policy Framework (NPPF) that was published in July 2021. As suggested in our response, there are both updated and new paragraphs</p>	Noted	Actions to be taken as appropriate in response to individual comments

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			<p>that you may wish to think about in terms of how these might help strengthen the supporting text or a policy in your Plan. It is also against this new NPPF that your Plan will be examined so, at the very minimum, you should ensure that all references etc. to the NPPF are brought up to date.</p> <p>Finally, we remind you that should you feel it necessary to make substantive changes to your Plan following the close of this round of public consultation, it may be appropriate and necessary for you to repeat this consultation stage prior to formally submitting both the Plan and other required documents to the District Council.</p>		
2	General	BDC	<p>Add the Plan period to the Front Cover. At submission stage, suggest this reads: <i>'Boxford Neighbourhood Plan 2018 - 2037. 'Submission Draft, [Month] 2021'</i></p> <ul style="list-style-type: none"> • A reminder to ensure supporting text etc. remains relevant as this NP progress to submission stage. e.g., Fig 1, text in para 1.7, para 6.6 etc. • Check and update references to/quotes from the NPPF following publication of the revised document in July 2021 (e.g., footnotes on pg 19 and 33. etc.) 	Agreed	Plan cover and Chapter 1 amended accordingly
3	General	Catesby Estates PLC	<p>Generally not in favour of the Plan and would like to see changes to it. Thank you for the opportunity to comment on the draft Boxford Neighbourhood Plan. This representation is made on behalf of Catesby Estates plc.</p>	Noted	No action required
4	General	SCC	<p><u>Education</u> <i>Early Years</i> As allocated housing is under 10 dwellings in this plan, this is likely to be a minimal impact on Early Years Care providers, and their capacity to take on additional children. <i>Primary Education</i></p>		Noted

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			<p>As SCC does not respond to, or record, developments under 10 dwellings we will not have included these in our forecasting. This is not usually an issue until a number of small developments come at once which cumulatively can put pressure on pupil places.</p> <p>Boxford CEVC Primary school has a capacity of 210 pupils, and a current pupil roll of 185 (September 2020). With the combination of permitted and proposed development in the plan, there would be an expected primary yield of around eight pupils. That would put the school over capacity (by 13 at a 95% capacity, and three at 100% capacity).</p> <p>Due to the small level of demand, as well as site constraints, it would not be possible to expand the school. However this might cause the school issues offering places to all pupils within their catchment who wish to attend. There is likely to be some out of catchment pupils. In these circumstances SCC would normally seek to manage school places by prioritising in catchment pupils, however it may take some time for out of catchment pupils to move through the school and free up places for children in-catchment.</p> <p><i>Secondary Education</i></p> <p>Hadleigh High School is the catchment secondary school for Boxford parish. The capacity is 870 pupils, and a current pupil roll of 746 (September 2020). Current forecasting indicates that the proposed development in Policy BOX 1A for seven dwellings is unlikely to have a significant impact on pupil place capacity.</p>		
5	General	EA	<p><u>Water Quality</u></p> <p>The Neighbourhood plan could usefully acknowledge the requirements of statutory environmental legislation, particularly the Water Framework Directive [WFD] and its principal objectives, in relation to any proposed development within the village. Currently there is no reference of WFD within Boxford Neighbourhood Plan.</p>	It is not considered that this level of detail is appropriate for the Neighbourhood Plan and may best be addressed in the Local	Amendment to Plan text at 11.7 and 12.12.

		<p><u>Water Framework Directive (WFD)</u> The two principal requirements of WFD are that development activities within the neighbourhood must not lead to a deterioration of the water environment and opportunities should be taken to improve river status where possible. The aim is for all waterbodies to achieve Good Ecological Status or better by 2027 at the latest. Boxford lies within the vicinity of WFD waterbody: ‘GB105036040920 Box. As the River Box watercourse runs directly through the village, any development within the neighbourhood should ensure there is not a deterioration in the river water quality of this waterbody, and where possible provide opportunities to safeguard and enhance the status of the watercourse.</p> <p>All waterbody information for the River Box GB105036040920 waterbody can be found on the Catchment Data Explorer. The current Ecological status for this waterbody is Moderate status. There should be a “Policy Box” within the Neighbourhood Plan which introduces WFD and statutory objectives of no deterioration and improving WFD waterbody status. The plan should look to provide some baseline status information for the Box GB105036040920 from the catchment data explorer to set context and background to the local water environment conditions.</p> <p><u>Surface Water Safeguard Zone & Drinking Water sources</u> In addition to WFD, due to the close proximity of the River Box flowing through the village it would also be useful for the neighbourhood plan to highlight that the watercourse actually forms part of a protected zone for a Surface Water Safeguard (SgZ) Zone, which is in place to protect local drinking water sources. Actions are in place in the safeguard zone to reduce diffuse pollution and improve water quality in order to protect</p>	<p>Plan as a more general point.</p> <p>It is not considered necessary to introduce a new policy on this issue at this stage. The suggested policy wording may be better located in the Local Plan where it can apply District wide.</p> <p>Agree this could be mentioned in the supporting text of the plan after 11.7 and at 12.12.</p> <p>The purpose of the Neighbourhood Plan is not to list who should</p>	
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		<p>local drinking water sources abstracted from the close by River Stour and Abbingdon Reservoir. Local drinking water sources are at risk from agricultural pesticides and nitrates. Making local residents aware of this in the neighbourhood plan will help spread awareness local drinking water quality and the importance of protecting the quality of the local watercourse.</p> <p>Sewage infrastructure</p> <p>The neighbourhood plan identifies no major issues with local sewerage infrastructure which would inhibit future development within the town. The only issues highlighted concern some areas of the sewer network at risk of localised flooding. It may be useful to highlight in the neighbourhood plan the need to liaise with Anglian Water regarding any potential upgrades or improvements to the sewer network required to resolve these issues.</p> <p>The village is connected into Boxford Water Recycling Centre (WRC) which only current has capacity for around 100 dwellings. The neighbourhood plan only highlights 7 new developments and I note that utilities are out of the scope for the neighbourhood plan. However, it would be good practise for the plan to highlight the importance for any proposed new development plans connecting into the foul sewer to be carefully planned in consultation with Anglian Water and it is recommended new connections are made to the mains sewer network. Early engagement with Anglian Water as the local sewerage undertaker will establish whether the existing foul sewage system has sufficient capacity to accept additional flows from any proposed developments.</p> <p>A Policy box specifically on sewerage infrastructure and highlighting these high-level points and the importance of developers to have early consultation with Anglian Water would be useful.</p>	<p>be contacted re pre-application.</p>	
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6	General	Avison Young on behalf of National Grid	Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.	Noted	No further action
7	General	Boyer on behalf of Vistry Group (re: Site at Butcher's Lane)	From our review, the majority of the principles of the BNP appear to be sound, and the context of the policies and objective appear to be locally based. In principle, the BNP would largely fulfil its role effectively as the 'local' element of the 'Development Plan'. However, there are a lack of sites allocated for development within the BNP and there is concern with the housing strategy which largely relies upon requirements being met through individual and small groups of dwellings. There is also concern over the reliability of the AECOM Site Options and Assessment Report (August 2021), upon which site allocations have been made. For the reasons set out within these representations, the BNP should consider the inclusion of a larger site for allocation to ensure that substantial community benefits can also be delivered from future development in the village rather than becoming susceptible to a range of small speculative developments that are limited in their ability to deliver public benefits.	Comments noted. Individual points are addressed later.	No change to Plan
8	General	Vistry Group	The BNP does not contribute to the achievement of sustainable development and therefore fails to meet the Basic Conditions as required by Paragraph 8(1)(a)(2) of Schedule 4B of the Town and Country Planning Act 1990 (inserted by the Localism Act 2011). The Draft JLP identifies a housing requirement of Boxford of just 13 dwellings across the plan period and the BNP makes just one allocation for 8 dwellings. There is evidence of current local housing need within Boxford beyond that identified in the Draft JLP and this should be reflected in the emerging BNP. The allocation of land north of Butcher's Lane, Boxford for residential	It is considered that the BNP does contribute to sustainable development through the combination of policies that allow for development whilst protecting sensitive sites.	No change to Plan

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			<p>development of 50-55 dwellings would meet this identified need. The Site presents an available, suitable and sustainable opportunity to provide a mix of housing types including smaller and affordable units in accordance with need. Development of the Site will provide community benefits and will create new footpath and cycle links, community orchard and open space, on a Site which would otherwise remain in private ownership with no public access. The Site will successfully connect existing residential development to the south with the allotments, recreation ground and play facilities to the north.</p> <p>Land north of Butcher's Lane has been wrongly assessed in the Site Options and Assessment Report (AECOM, August 2021), that has been prepared to support and inform preparation of the BNP. As such, the Site has been discounted for future development for unjustified reasons. As a thorough and objective assessment of sites has not been undertaken, the approach to future development cannot be said to contribute to sustainable development. It is considered that a further assessment of the Site should be undertaken, to take into consideration the information presented in these representations.</p>	<p>The proposed site is not required to meet the housing requirement in the emerging Local Plan. In addition there are issues of capacity at the school , highways and for water recycling</p> <p>The site has not been wrongly assessed by AECOM. They and BDC independently reached the same conclusions. AECOM undertook a site visit.</p>	
9	General	Catesby Estates PLC	<p>General: Thank you for the opportunity to comment on the draft Boxford Neighbourhood Plan. This representation is made on behalf of Catesby Estates plc.</p> <p>Catesby Estates have significant concerns about the validity of the draft Neighbourhood Plan consultation. This is principally because the Site Options and Assessment referred to in draft Plan was unavailable to view at the outset of the consultation. When a copy of the Site Options and Assessment was requested only a draft version (dated June 2021) was initially available.</p>	<p>The Site Options assessment was not on the website at the beginning of the consultation however the consultation was extended, and it was available for a full 6-week period compliant with the regulations.</p> <p>The report was draft as it was to be refined</p>	No change to Plan.

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				through consultation and an error raised by this respondent was noted.	
10	Chapter 2 - Archaeology	SCC	<p>Archaeology</p> <p>In Chapter 2 the Historic Environment section should make note about the historic environment with finds and monuments in the parish with information from the Historic Environment Record (HER). It should state that the HER is held by Suffolk County Council Archaeological Service (SCCAS), with publicly accessible records viewable on the Suffolk Heritage Explorer, which can be viewed at https://heritage.suffolk.gov.uk/.</p> <p>The following examples of heritage assets are recorded on the HER, linked to the publicly accessible heritage explorer:</p> <ul style="list-style-type: none"> • Half a Mesolithic tranchet axe and a sharpening flake (HER reference number BXF 006) • Bronze Age ‘quoit headed’ pin (BXF 005) • Late Iron Age Belgic cemetery (BXF 001) • Roman quern stone (BXF 002) • Roman bronze figure of Mercury (BXF 007) • 13th century lead seal matrix and a 15th century French issue bronze jetton (BXF 035) • Roman and medieval metalwork scatter (BXF 010) • Mesolithic, Roman, medieval and post medieval finds scatter (BXF 033) <p>Further information would be available to the neighbourhood plan by undertaking a Historic Environment Record search.¹</p> <p>In Chapter 7, which discusses housing, SCC would encourage addition of a note relating to archaeology in development, such as the following wording. This would give clarity to developers of future sites.</p>	Noted. We can add reference to the HER into the appropriate section	Add reference to para 2.32 in chapter 2

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			<p><i>“Suffolk County Council manages the Historic Environment Record for the county. Non-designated archaeological heritage assets would be managed through the National Planning Policy Framework. Suffolk County Council Archaeological Service advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of the area at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework (NPPF) and the Babergh District Council Core Strategy (2011- 2031) are met. Suffolk County Council Archaeological Service is happy to advise on the level of assessment and appropriate stages to be undertaken.”</i></p> <p>The plan could also highlight a level of outreach and public engagement that might be aspired to from archaeology undertaken as part of a development project. Increased public understanding of heritage assets is an aspiration of the NPPF, and provision in project designs for outreach and engagement are welcomed.</p>		
11	Chapters 1-4	Vistry Group	<p>Paragraph 1.8 provides details of the supporting documents that will accompany the BNP for independent Examination. A number are available to view and are considered within these representations as relevant. However, it is noted that the Strategic Environmental Assessment Screening Report and the Habitat Regulation Screening Report have not been made available as part of the consultation. To ensure the BNP is robust, these should be undertaken in the early stages of preparation of the BNP and should be available to view and comment on at the pre-submission stage.</p> <p>At Paragraph 4.4, a breakdown is provided of each stage of the BNP process. There is no reference to a Regulation 16 consultation and the BNP should be updated to include this.</p>	Noted. These are referred to in case they are required by the Screening Direction. There is no requirement for HRA following BDC screening. SEA is still in progress.	No change to Plan

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12	Vision and Objectives	Vistry Group	<p>Vision and Objectives</p> <p>The Vision and Objectives echo the principles set out within national planning policy through the NPPF and are largely supported.</p>	Noted	No change to Plan
13	Vision and Objectives	Catesby Estates PLC	<p>Objective 1: Catesby Estates strongly support Objective 1 - “To provide for housing growth of all tenures and sizes to meet the needs of the current and future generations”.</p>	Support noted	
14	Vision and Objectives	SCC	<p><i>Environmental Objective</i></p> <p>Objective 7 puts important views at the centre of the Natural Environment chapter of the draft plan, however it is clear from other the policies that other elements of the natural environment, such as wildlife, habitats and green spaces are also important to the community. It is recommended that the objective is rewritten to include these elements as well, which would better reflect the content of the policies.</p>	<p>Noted</p> <p>There is a point here – we can expand the objective</p>	Objective 7 has been expanded accordingly.
15	Chapter 7 - Housing Policies	Vistry Group	<p>National planning guidance states that “<i>Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change and allows plans to remain up to date over a longer time scale.</i>” (NPPG Paragraph 103 Reference ID: 41-103-20190509).</p> <p>Draft JLP Policy SP04 ‘Housing Spatial Distribution’ states in relation to Neighbourhood Plans:</p> <p><i>“In order to assist with delivery of the overall district housing need requirements, designated Neighbourhood Plan areas will be expected to plan to deliver the minimum housing requirements set out in Table 4. Neighbourhood Plan documents can seek to exceed these requirements, should the unique characteristics and planning context of the designated area enable so.”</i></p> <p>Table 4 of the Draft JLP sets out that a minimum of 13 new homes are required in the BNP Area over the plan period. Of</p>	<p>The housing requirement as set out in the emerging Local Plan has been met and the Plan also makes a further allocation for 7 dwellings together with an allowance for windfall and infill.</p> <p>Conversely smaller numbers would place less strain on current infrastructure. Other consultees have highlighted capacity</p>	No change to Plan

		<p>these 8 are identified as existing commitments that currently benefit from outline planning permission.</p> <p>The Draft JLP currently proposes to allocate one site, for 5 dwellings, at the Boxford Calais Street Hamlet under Policy LS01.</p> <p>Paragraph 7.7 of the BNP identifies the applications that have been permitted since 1st April 2018 and states that a further 9 dwellings will be added to the overall total. However, this assumes that all of these permissions are implemented. Other than 4 dwellings on the former nursery at Calais Street all of the permissions are for one new dwelling. As such, it is not considered that any infrastructure or wider community benefits will be generated and development of this nature adds additional strain on existing facilities, services and the highway network without providing any mitigation.</p> <p>Boxford is identified as a Core Village, due to the range of services and facilities available. Core Villages are clearly recognised as sustainable locations for accommodating new development, and act as a focus for development in Babergh district.</p> <p>The Draft JLP makes clear that the housing requirements for Neighbourhood Plan Areas (provided at Table 4 of the Draft JLP) are the <i>minimum</i> that should be met and should be regarded as a starting point for addressing housing need for the area. It should also be recognised that, at this stage, the figures within the Draft JLP should not be relied upon as the Plan is yet to be tested at Examination. Coupled with the proven local housing need in Boxford (see Paragraphs 3.17 to 3.26 above), the Neighbourhood Plan Group should look to take a proactive approach in identifying where there may be opportunities to exceed the requirements in the Draft JLP, such as through the allocation of the land north of Butcher’s Lane, in order to meet the government’s objective of significantly boosting the supply of homes (NPPF, paragraph 59).</p>	<p>issues in respect of the school, highways and water infrastructure which would not seem to support a larger allocation than that already shown in the Neighbourhood Plan.</p>	
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16	Chapter 7 - Housing	Catesby Estates PLC	<p>Critically the draft Site Options and Assessment (dated June 2021) revealed fundamental contradictions with the draft Neighbourhood Plan published for consultation. The draft Site Assessment referred to the Neighbourhood Plan group’s intention to exceed the emerging Joint Local Plan requirement and to allocate additional homes to meet the demand identified in Housing Needs Assessment (approximately 23 homes). This strategy was not however reflected in the draft Neighbourhood Plan issued for consultation which only proposes the allocation of one site for 7 homes.</p> <p>The draft Site Options and Assessment (June 2021) states at paragraph 1.10:</p> <p>“The Neighbourhood Plan group is proposing to exceed the Local Plan requirement and to allocate approximately 23 additional homes based on a Housing Needs Assessment”</p> <p>On the 18 August (6 weeks after the draft Neighbourhood Plan consultation commenced) a final version of the Site Options and Assessment (dated August 2021) was published on the Parish Council’s website which makes a subtle but significant change to the above paragraph:</p> <p>“The Neighbourhood Plan group is proposing to exceed the Local Plan requirement and is also keen to explore ways to take steps towards meeting the demand for Affordable Housing identified in its Housing Needs Assessment which is approximately 28 homes”</p> <p>It was completely unacceptable for the draft Neighbourhood Plan to be published for consultation when the Site Options and Assessment evidence base document was unavailable to view from the outset. It is also equally unacceptable for the evidence</p>	<p>There was an error in the draft Site Options Assessment which referred to 23 homes when it should have been 28, which was clearly set out in the Housing Needs Assessment. It was not a fundamental contradiction, and the error was corrected. The conclusion of the Housing Needs Assessment was that the delivery of 28 new affordable homes was unlikely to be achievable over the plan period. The issues of school capacity, water and highways are equally applicable to all forms of housing and therefore a larger housing allocation would not be appropriate. The evidence base for any plan evolves as the plan evolves – it is unreasonable to assume that the</p>	No change to Plan.
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			<p>base to be significantly amended during the consultation.</p> <p>Catesby Estates strongly consider that the draft Boxford Neighbourhood Plan is deficient. The amendments to the Site Options and Assessment made during the consultation period have meant it has not been at all clear what role it has played in the formulation of the policies included within the draft Neighbourhood Plan.</p> <p>Catesby Estates strongly consider that the pre submission consultation on the Boxford Neighbourhood Plan is deficient and should be repeated with the final evidence base published from the outset.</p>	<p>evidence base at REG14 is final as it does not allow for changes that may emerge as a result of consultation to be included to accommodate them. The REG14 consultation was compliant with the statutory requirements.</p>	
17	Chapter 7 – Housing	BDC	<p>Calais Street and Stone Street Hamlets</p> <p>We welcome the adoption of the settlement boundaries at Calais Street and Stone Street. These are subsequently shown on Map 5 and Map 6 in Chapter 7. It would be helpful to include a cross reference to these maps in para 3.8</p> <p>Boxford Village settlement boundary and allocation made at BOX 1A</p> <p>In Chapter 3, the NP is silent on the settlement boundary around the core village, although this is subsequently shown on Map 4 and, less discernibly, on Policy Map Inset 1 and Policy Map Inset 2 in Appendix D of the Plan.</p> <p>Following our earlier suggestion, Map 7 [the BOX 1A allocation map] now defines a new settlement boundary to encompass the proposed housing area. An explanation for this in the supporting text seems appropriate. The end of para 7.16 might be the best place for that.</p> <p>In Policy BOX 1 consider establishing which map(s) should now be referred to as showing the correct settlement boundaries.</p>	<p>Noted</p> <p>Amendments required</p>	<p>Maps and text to be updated accordingly</p>

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			Policy Map Inset 1 and Policy Map Inset 2 both need amending to show the 'new' settlement boundary at Boxford Village. i.e., to be consistent with Map 7. In all cases, it would be helpful if this boundary were made clearer.		
18	Chapter 7 - Housing Policies	SCC	<p><i>Site Allocations:</i></p> <p>Local Plan Site LSO1: This site is in an area of archaeological potential as indicated by the county held Historic Environment Record (HER). The site is close to the find spot of a bronze figurine of Mercury dating from the Roman period (HER ref no. BXF 007) and two roman coins (BXF 049). Furthermore, the site is near to undated cropmarks of field systems which include rectilinear ditches (BXF 003). As a result, there is high potential for encountering buried heritage assets at this location. SCCAS would have no objection in principle but will require a planning condition under the NPPF to secure a programme of archaeological investigation.</p>	Noted. This is a Local Plan allocation not an allocation in the NP – therefore this information is best directed to BDC	No change to Plan
19	Table 2/Footnote 7	BDC	Update footnote 7 (page 31) to correctly refer to ' ... <i>Table 2 below.</i> '	Noted	Plan amended accordingly
20	Table 2	BDC	<p>The following may require a further conversation to clarify facts. There is an error(?) with the last entry in Table 2, and para 7.7 should helpfully set out the end-date for the search period.</p> <p>The last entry in Table 2 (DC/17/02491 - Pro Tem, Calais Street) appears to have been granted permission on 24 July 2017 but, for an unknown reason, is not recorded as such in the SHELAA (Oct 2020). Consequently, it is not shown in Table 1. The application details [still available online] also imply that this was a replacement dwelling, so a net zero gain. Given the SHELAA discrepancy etc. we recommend that you leave this in Table 2 but amend the last column to show this as '0 (Replacement dwelling)'. Table 2 could also helpfully show the Approval Dates for each entry. They are</p>	Noted	Paragraph and table amended accordingly

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			<table border="1"> <tr> <td>DC/18/04967</td> <td>11.03.2020 (On Appeal)</td> <td>DC/19/03791</td> <td>08</td> </tr> <tr> <td>DC/20/04286</td> <td>12.01.2021</td> <td>DC/18/03686</td> <td>02</td> </tr> <tr> <td>DC/20/03680</td> <td>01.12.2020</td> <td>DC/18/04316</td> <td>22</td> </tr> <tr> <td>DC/19/02781</td> <td>07.08.2019</td> <td>DC/17/02491</td> <td>24</td> </tr> <tr> <td>DC/20/02336</td> <td>30.07.2020</td> <td></td> <td></td> </tr> </table>	DC/18/04967	11.03.2020 (On Appeal)	DC/19/03791	08	DC/20/04286	12.01.2021	DC/18/03686	02	DC/20/03680	01.12.2020	DC/18/04316	22	DC/19/02781	07.08.2019	DC/17/02491	24	DC/20/02336	30.07.2020				
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DC/19/02781	07.08.2019	DC/17/02491	24																						
DC/20/02336	30.07.2020																								
			<p>Para 7.7 advises that 9 additional dwellings were granted planning permission after 1 April 2018. Implementing the change to the Pro Tem entry above would mean that both para 7.7 and the final total in Table 2 should both now read as 8 new dwellings. It would also be helpful, when looking back at this NP in the future, for para 7.7 to clearly state the end of the search period. That would, according to para 7.8, appear to have been March 2021 but you should use the correct date from your own records.</p> <p>Given that the BMSJLP already identifies that 8 of the 13 minimum required dwellings for this plan area already have planning permission and that it allocates a site in the Calais Street Hamlet to deliver the other 5 dwellings, the Pro Tem development proposal is relegated to a matter of factual accuracy and the statement in para 7.10 stands as correct.</p>																						
21	Policy BOX1 Housing Strategy	BDC	See our earlier comment re settlement boundaries.	Noted	See above																				
22	Policy BOX1 Housing Strategy	Vistry Group	Policy BOX1 – Housing Strategy for Boxford Policy BOX1 sets out the Housing Strategy which includes one allocation for 7 dwellings (and a village car park) on land at Stone Street. The BNP therefore exceeds the Boxford	The Housing requirement as set out in the emerging Local Plan is met and exceeded. Constraints	No change to Plan																				

		<p>housing requirement by 7 dwellings. Whilst this is supported and the development will provide a much-needed village car park, the housing strategy otherwise relies on speculative development of individual dwellings or small groups of houses within the settlement boundary being brought forward largely on an ‘ad hoc’ basis. We do not consider this will enable the flexibility for Objective 1 to be met. Policy BOX1 should provide flexibility for housing on suitable sites outside the currently defined settlement boundary, that relate well to the existing settlement, where it is demonstrated that there is a proven local need.</p> <p>National planning guidance states that housing supply policies in the Neighbourhood Plans should take account of the latest and up-to-date evidence of housing need (NPPG paragraph 040 Reference ID: 41-040-20160211).</p> <p>There are significant benefits to development on larger sites. In addition to Policy BOX 1A, Land north of Butcher’s Lane should be included as a site-specific allocation to meet a proven current local housing need. The Site is well related to the existing settlement and the development of the Site would bring considerable community benefit with the provision of new footpath links and open space, on land that is currently in private ownership, connecting development to the south with the playing fields and allotments to the north. Such community benefits are only feasible through the development of a larger site, whereas numerous ‘ad hoc’, smaller developments would not be able to bring the same benefits to the village. A larger site also provides the opportunity to offer a range of dwelling types to meet the differing needs of the community.</p> <p>4.14 It is notable that Boxford has been allocated less development than other Core Villages. It is our view that where there are suitable sites available, the BNP should be planning for</p>	<p>in respect of the school, highways and water have been identified by consultees indicating that a higher level of housing would have infrastructure implications.</p> <p>Policy BOX 1 and BOX3 allow for affordable housing outside of the settlement boundary subject to criteria.</p> <p>The spatial distribution of housing in the district is a matter for the Local Plan. It is not a mathematical formula and takes into account the specifics of the settlement including identified constraints such as school capacity, water and highways.</p> <p>The figure of 13 is for the Local Plan not the NP examination</p>	
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			<p>additional growth through formal site allocations. It is important for the Neighbourhood Plan to facilitate the provision of new housing to meet local housing needs and contribute to housing delivery both in the Neighbourhood Area and the wider district, to accord with the Government’s objectives of the NPPF and to satisfy the requirements of the Draft JLP.</p> <p>It is apparent from the BNP Site Options and Assessment Final Report (AECOM, August 2021) that the majority of sites considered were small scale and there is an absence of larger sites that have been previously promoted for development within Boxford. As set out within Section 3 of this representation’s submission, when a proper assessment of the Site at land north of Butcher’s Lane is made, there are limited constraints to its development and none that can’t be mitigated. Therefore, this Site should be included within the housing strategy as an ideal solution to meeting evidenced local housing need. For the reasons set out above, Policy BOX1 is not currently supported, and provision needs to be made for the allocation of further sustainable sites.</p>		
23	Policy BOX1 Housing Strategy	Catesby Estates PLC	<p>An objection to Chapter 7 / Policy BOX1 is raised on the basis that the consultation on the draft Neighbourhood Plan is premature in advance of the completion of the examination of the emerging Joint Babergh and Mid Suffolk Local Plan.</p> <p>The draft Neighbourhood Plan has been prepared on the assumption that the Joint Local Plan will identify Boxford a requirement for 13 new dwellings over the plan period. The Joint Local Plan however currently holds limited weight, given that it remains to be examined and there are significant outstanding objections, notably in relation to the housing requirement and proposed spatial distribution.</p> <p>Given the potential for amendment to the housing requirement</p>	<p>NPs can be produced at any point in time relative to the position of the Local Plan . This is recognised in NPPF para 30 . Therefore the plan is not premature</p>	No change to Plan.

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		<p>for Boxford following independent examination of the Joint Plan it is considered that the consultation on draft Neighbourhood Plan is premature. Given the significant impacts the Joint Local Plan will have for the Neighbourhood Plan it is considered that preparation of the Neighbourhood Plan should be paused until the outcome of independent examination is known later this year.</p> <p>Notwithstanding the prematurity of this consultation, it is considered that the housing strategy and policies as proposed in the draft Neighbourhood Plan will not adequately meet the housing needs of the village, as identified by the Neighbourhood Plan's own evidence base. This is highlighted by the Boxford Housing Need Assessment (Aecom September 2020) which confirms the need for 28 affordable properties in Boxford over the Neighbourhood Plan period.</p> <p>National Planning Practice Guidance is clear that evidence of this nature should be taken into consideration when determining a Neighbourhood Plan's development requirements and balancing needs (paragraph: 101 reference ID: 41-101-20190509).</p> <p>The proposed approach to housing delivery in Boxford (a highly sustainable Core Village) will not deliver any affordable housing and is at clear odds with Objective 1 set out in the Vision Chapter (05) of the draft Plan Neighbourhood Plan which states: "To provide for housing growth of all tenures and sizes to meet the needs of the current and future generations".</p> <p>The consequence of the proposed approach to housing will be an ever-increasing need for affordable housing, worsening housing affordability and, an out migration leading to the decline of the settlement and its services and facilities over time. The proposed</p>	<p>The HNA has contributed to the Neighbourhood Plan policies. The HNA indicates at para 11 that is unlikely the need would be met in full over the plan period. The SG instead decided to make gradual inroads to it through the exceptions policy. This objective is not the intention, and the error has been corrected. The plan provides for open market housing through allocation and affordable housing through policy. No this was never the case; The revised wording was to make this clear.</p>	
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			<p>approach cannot therefore comprise a sustainable development strategy nor be positively prepared or effective.</p> <p>The draft Site Options and Assessment (June 2021) indicates that the Neighbourhood Plan group previously intended to meet the above objective by allocating additional homes based on the findings on the Housing Needs Assessment. It is not evident why the draft Neighbourhood Plan does not adopt this previously intended approach.</p> <p>The decision not to meet the identified need for affordable housing is unjustified given the clear and available opportunity for the Neighbourhood Plan to support the delivery of 22 affordable homes (representing most of the identified affordable housing need) as part of Catesby Estates proposals for 64 dwellings on the land east of Sand Hill.</p> <p>Planning permission (ref DC/20/00330/OUT) for the development on the land east of Sand Hill was approved in December 2020, but then subsequently quashed on a technicality relating to the S106 (as opposed to the principle of development). The application is currently being redetermined to correct the technicality with the S106.</p> <p>The land east of Sand Hill is evidently suitable for development. To meet both the identified affordable housing need for Boxford and Objective 1 of the draft Neighbourhood Plan, the land east of Sand Hill should be allocated for development in the next stage of the Neighbourhood Plan.</p>		
24	Policy BOX1A	SCC	Neighbourhood Plan Site BOX 1 1A: Housing Allocation for 7 Dwellings and new car park at Stone Street. This site is in an area	Noted	No change to Plan.

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	Housing Allocation		of archaeological potential as indicated by the county held Historic Environment Record (HER). In close proximity to the Church of St Mary, which has medieval origins (HER ref no. BXF 008). On the opposite side of the River Box is the finds spot of a Roman quern stone (BXF 002) and the find spot of a Saxon brooch fragment (BXF 009). As a result, there is high potential for encountering buried heritage assets at this location. SCCAS would have no objection in principle but will require a planning condition under the NPPF to secure a programme of archaeological investigation.		
25	Policy BOX1A – Housing Allocation	BDC	We commented informally on this allocation, noting that the site had been assessed and discounted through the SHELAA process. At the time, the policy contained only the briefest list of criteria. The more detailed criteria are welcomed, addressing as they do the concerns raised by our Heritage Team. In para 7.14 specific mention is made of the primary school capacity issue. There is no mention of this in Policy BOX 1A. You may wish to address this.	Comments welcomed Need to refer to this	Reference to the primary school capacity issue will be added to Policy BOX1A
26	Policy BOX1, 1A and BOX 2 Housing Strategy, Allocation and Housing Mix	Hopkins Homes	Housing Policies Whilst noting the key Objective ‘ <i>to provide for housing growth of all tenures and sizes to meet the needs of the current and future generations</i> ’, the subsequent content of suggested Policies BOX1, BOX1a & BOX2 unfortunately appear unlikely to be able to achieve this laudable aim. As we have previously set out in our representations to both the previous Neighbourhood Plan Consultation and those of the Babergh Mid-Suffolk Joint Local Plan, Boxford is identified as a Core Village, but is not proposed to be allocated anywhere near the level of growth of that of other such defined Core Villages. The total committed and allocated growth in Boxford is just 77 dwellings, which is far below the average level of growth proposed in Babergh’s other Core Villages of 193 dwellings.	See response to Vistry and Catesby above	No change to Plan

		<p>We have therefore previously advised the Babergh Mid-Suffolk District Council that Boxford should be allocated more growth, to fully reflect its important role and function as a key settlement, serving both its own residents and those of surrounding rural villages and in a similar vein, would therefore strongly suggest that to achieve the above stated Objective, further positive allocations of land to deliver new residential development should be made within the Boxford Neighbourhood Plan.</p> <p>It is somewhat ironic that within paragraph 2.23 of the Draft Plan, the trend of the <i>'missing millennials'</i> is noted and lamented, but that Policies BOX1 and BOX1a then proceed to offer a miserly Allocation of just 7 further dwellings as a token gesture to seemingly try and address this trend.</p> <p>In this context, we consider that our available site on the land West of Sand Hill represents a uniquely sustainable option to deliver additional residential growth for the village.</p> <p>As you may be aware, the site comprises approximately 3.5ha of agricultural land which is located the south of the village, immediately adjacent to the existing settlement limit and existing residential development. To the north of the site is the residential development of The Causeway, to the east the site adjoins residential development and agricultural land, and the south is agricultural land. The site is bordered by trees and hedgerows to the north, east, south and west. The site is located on the fringe of a Special Landscape Area and adjoins Boxford Conservation Area. The majority of the site lies within Flood Zone 1, with an area to the west falling within Flood Zones 2 and 3 which follows the route of the River Box. The site benefits from extensive frontage along Sand Hill, meaning that provision of a safe and suitable access is entirely feasible, has been tested and agreed with the Local Highway Authority the site is also well connected to the existing network of footpaths in the surrounding area.</p>		
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			As outlined upon the attached Masterplan, the site can be developed for approximately 30 dwellings, including affordable housing, with vehicular and pedestrian access from Sand Hill. The quantum of development proposed would allow for a relatively low density of development to respect the edge of settlement location and allow for the provision of a new landscaped edge to the south of the village, including on-site open space provision.		
27	Policy BOX 2 Housing Mix	Vistry Group	<p>Policy BOX 2 - Housing Mix</p> <p>Policy BOX 2 states that the mix of new housing will be provided in accordance with the AECOM Housing Needs Assessment (October 2020). It cannot be relied upon that this report will remain up to date for the Neighbourhood Plan period. Therefore, it would be more appropriate for policy BOX2 to clearly reference that housing need should be provided in accordance with the October 2020 Housing Needs Assessment, or any more up to date evidence. It is important to note planning guidance which states that any Neighbourhood Plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally produced information (NPPG Paragraph 103 Reference ID: 41-103-20190509).</p> <p>Policy BOX 2 states that new developments should have a specific focus on providing smaller dwellings for families and to enable downsizing. Particular support will be given to smaller family homes of 1 to 3 beds and bungalows. The best way to achieve this need will be through a larger comprehensive development that provides for a range of dwelling types and sizes</p> <p>Paragraph 7.38 of the supporting text to Policy BOX 2, states:</p>	<p>The Community Projects on page 28 of the REG14 version of the Plan refer to a Local Housing Needs Survey to be undertaken in 5 years-time to ensure evidence is kept up to date.</p> <p>This statement is made in relation to exception sites where their identification through allocation may not result in affordable housing coming forward but instead market housing as the principle of</p>	No change to Plan.

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			<p><i>“It is recognised that there are specific difficulties that arise from allocating sites outside of the settlement boundary as these tend to result in landowners developing on a commercial basis leaving the housing need unmet”.</i></p> <p>This statement is disputed as the whole principle of having an allocation is to be able to identify where development will be and to influence the format this will take. Where there is a specific identified housing need, this can be written into the allocation policy and the required dwelling types and sizes can be stipulated. Allocations provide much greater control over future development than relying on speculative developments.</p>	development in the siter has been accepted.	
28	Policy BOX 2 – Housing Mix	BDC	<p>Para 7.36 suggests that Option 2 from the Housing Needs Assessment (HNA) (Table 4-4, pg 27) is the option chosen, but Policy Box 2 reflects Option 1.</p> <p>The Parish Council should determine which Option is their preference and make the Plan clear on that point. In doing so, they should be aware of:</p> <ul style="list-style-type: none"> - The Government’s changes to the Planning Practice Guidance, which require that NPs published for Reg 14 consultation after 28 June 2021 include a policy requirement for 25% of affordable homes to be First Homes. - Changes to the Shared Ownership model which lowers the initial purchase share of a Shared Ownership property to 10%*, making them more accessible / affordable to those on lower incomes. This may change the conclusion drawn by the HNA and so the policy preference of the Parish may also change. - You may also wish to seek further advice from your HNA consultants (AECOM) on this point. Officers at the Council would be pleased to support consideration of this matter and participate in that discussion. <p>In respect of First Homes, the NP has an ability to set different rates of discount. The HNA notes that a standard discount on</p>	<p>Noted</p> <p>The policy needs to be amended to take into account the PPG requirement and to clarify the appropriate mix between routes to homes ownership and affordable housing to rent</p>	The policy has been updated to reflect latest position

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			<p>First Homes – of 30% - would not be sufficient to make the product affordable to those on mean incomes (see para 141). The NP group should consider the recommendation in the evidence and determine whether a 40% discount would be an appropriate policy response to increasing the affordability of any First Homes being delivered in the village.</p> <p>The Council is willing to accept Rent to Buy as an affordable housing product, but the following conditions need to be met in order to secure the Council’s acceptance of this product on a given site:</p> <ul style="list-style-type: none"> - Sufficient longevity and security of tenure for tenants. - Management of properties by a suitable Registered Housing Provider, acceptable to Homes England and the Regulator of Social Housing. <p>The HNA notes that this is an emerging product, the popularity and effectiveness of which is yet unknown. Not every provider of Rent to Buy properties is able or willing to meet the important conditions, set out above. As such, this affordable housing product can sometimes be challenging to deliver.</p> <p><i>* Noted in the HNA, Table 4-4, page 27, also footnote 21.</i></p>		
29	Policy BOX2 Housing Mix	SCC	<p>Health and Wellbeing <i>Ageing Population</i></p> <p>The neighbourhood plan states that 26.6% of the residents are aged 65 or older, which is above the Suffolk average. SCC welcomes the mention of M4(2) and M4(3) housing in paragraph 7.31, however we request that this support is expressed in policy. SCC notes that there is an emphasis placed on bungalows as the accommodation for an ageing population, however there are more options available to meet the needs of an increasingly frail population and/or those with restricted mobility.</p>	Noted	No change to Plan

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			<p>Building homes that are accessible and adaptable means that these homes can be changed with the needs of their occupants, for example if their mobility worsens with age, as these homes are built to a standard that can meet the needs of a lifetime. While it is understandable that each housing type may not be suitably accommodated on every site, efforts should be made where possible to ensure that each site contains a mixture of housing types. This can help prevent segregation by age group and possible resulting isolation.</p> <p>Therefore, the following wording is recommended for Policy BOX2 Housing Mix: “Particular support will be given to proposals that include the following:</p> <ul style="list-style-type: none"> • Smaller affordable homes (1-3 beds) • Bungalows to allow for down-sizing. • <i>Smaller 2 and 3 bedroomed homes that are adaptable and accessible (built to M4(2) and M4(3) standards)</i>” <p>It is suggested that there could also be further considerations for the needs of residents who are living with dementia in the community, and the potential for making Boxford a “Dementia-Friendly” village. The Royal Town Planning Institute has guidance on Town Planning and Dementia ², which may be helpful in informing policies.</p>	<p>This might be appropriate for a future review of the NP or for a project</p>	
30	Policy BOX 3 Rural Exception Sites	Vistry Group	<p>Policy BOX 3 – Rural Exception Sites Draft Policy BOX 3 and the strategy to support affordable housing provision through rural exception sites is noted. Given the identified affordable housing need of 28 dwellings over the plan period (AECOM Housing Needs Assessment Report), rural exception sites should not be relied upon as the sole affordable housing provision and the NPG should go further in</p>	<p>Noted.</p> <p>There are constraints identified by other consultees that relate to schools, highways and water above which would not</p>	No change to Plan.

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			ensuring that adequate affordable housing is provided. The most appropriate strategy for this will be through the allocation of a larger site. This approach also enables new affordable housing to be provided in a manner that better assists integration with the community, by blending different house types in a tenure blind development, rather than an isolated pocket of affordable houses.	support a higher level of allocation. The site has been rejected by BDC and AECOM	
31	Chapter 8 – Transport Strategy	SCC	<p><u>Transport</u> <i>Congestion and Safety Issues</i></p> <p>SCC notes the desire to better manage pedestrian safety, parking and highway user conflict within the village and also recognises the challenges that the neighbourhood plan describes well. As a general principle, SCC supports improving pedestrian access and giving pedestrians priority within the context of a settlement. Reservations about the attractiveness of signage and that this may conflict with the conservation area are noted, but this should be considered in balance with the greater safety provided by lower speeds and traffic calming measures, which may create a more comfortable and pleasant place.</p> <p>The Neighbourhood Plan may wish to draw from Historic England’s Streets for All guidance^{7, 8}, which provides advice in balancing these issues.</p> <p>Should the community wish to pursue the potential for a 20 mile per hour zone you can find information on the criteria and how to initiate the process on the County Council’s website.</p> <p><i>Active Travel</i></p> <p>Active travel, such as walking and cycling, is important in order to improve physical health and reduce obesity levels, as well as can help to minimise levels of air pollution from motorised vehicles</p>	Noted	No change to Plan
32	Chapter 8 – A Transport	Vistry Group	<p>Chapter 8 – A Transport Strategy for Boxford</p> <p>It is recognised that traffic and highways safety are existing concerns in various parts of the village and future development</p>	Noted. There are issues identified with	No change to Plan.

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	Strategy for Boxford		needs to take this into consideration. Transport and traffic is not usually needed to be considered in the same detail for small scale development as it is for larger schemes. This can lead to multiple small-scale developments being approved with a cumulative detrimental impact on the highways network without the provision of necessary mitigation. Transport mitigation can be better controlled if part of a larger development and therefore this is overall likely to have less impact upon the highway than multiple small scale speculative developments.	schools, water and highways which indicate that a larger allocation would be problematic. The site has been rejected by BDC and AECOM	
33	Policy BOX4 and 5 Safety and Improving Access & Connectivity	SCC	SCC welcomes the desire for safe walking and cycling routes highlighted throughout the plan and particularly in Policies BOX4 and BOX5, highlighting the importance of pedestrian and cyclist safety. Safe routes for walking and cycling are important to ensure the safety of residents of all ages, especially those that are very young or very old, and have mobility issues or are frail	Noted	No change to Plan
34	Policy BOX 4 – Maps 8 and 9	BDC	Consider swapping these maps around so Map 8 becomes the PRow Map, and Map 9 becomes The Croft Map. The references within para’s 8.9 and 8.11, and in BOX 4 would also need updating, but at least the sequence would be logical.	Noted Maps to be amended	Maps to be amended accordingly
35	Policy BOX4 and 5 Safety and Improving Access & Connectivity	SCC	<i>Sustainable Transport - Policies BOX4 and BOX5</i> SCC supports Policy BOX4, and SCC Transport Planning team will seek improvements through development wherever feasible within the constraints of the narrow highway corridors in the village and scale of development. Policy BOX5 and any proposal to improve and encourage sustainable travel will be supported. It is suggested that the final bullet of 9.18 include the word “secure” for cycle parking, and in Policy BOX5 also, as follows “e.g., secure cycle parking and safe storage”	Noted. Agree to add ‘secure’ to the Policy	3
36	Policy BOX4 Safety	SCC	Public Rights of Way	Noted	Policy amended accordingly

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			<p>Objective 2 and Policy BOX4 (pages 47-48) are very welcome with the focus on the public rights of way network.</p> <p>The final paragraph of this section refers to the creation of new routes, but could also include emphasis on developing existing routes, as this has the same objective and outcome of increasing the health and wellbeing of residents.</p> <p>Reference to the footpath 'The Croft' could also accurately refer to this route as 'Boxford Public Footpath 8'.</p> <p>There could be reference to other strategies that support this Neighbourhood Plan. This includes Suffolk County Council's Green Access Strategy (2020-2030)⁶. This strategy sets out the council's commitment to enhance public rights of way, including new linkages and upgrading routes where there is a need. The strategy also seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working.</p>	<p>Agree the policy could be amended to reflect these comments</p>	
37	Policy BOX6 New Village car park	SCC	<p><i>Community Projects: new village car park, paragraph 6.6</i></p> <p>SCC would support the aspirations of the parish for the provision of a car park, and close to the primary school would be a beneficial location. However, there are several potential issues with this proposal which would need to be addressed:</p> <ul style="list-style-type: none"> • Lack of a footway between the car park and school (this could be mitigated by providing a direct access point from the car park to the school). • Potential loss of a large turning head on Stone Street that may be necessary for large vehicle use, as the turning head at the southern end of the road appears to be of a substandard size (it would be necessary to evidence that all vehicles can turn in the turning head at the southern end of the road). 	<p>Comments welcomed</p> <p>Policy amended accordingly</p>	<p>Amend policy accordingly</p>
38	Policy BOX6 and 7 New Village Car Park and	SCC	<p><i>Parking - Policies BOX6 and BOX7</i></p> <p>As 6.6 comment above.</p> <p>Also, generally with regard to parking, particularly relating to new development in the village:</p>	<p>Noted</p> <p>Amend accordingly</p>	<p>Text amended accordingly.</p>

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	The Design of New Development		Parking and manoeuvring, secure cycle storage and EV charging infrastructure should be provided in accordance with Suffolk Guidance for Parking 2019 ¹⁰ (SGP) and it is welcome that reference is made to this guidance in Policy BOX7.		
39	Chapter 9 – Built and Historic Environment	Vistry Group	<p>Chapter 9 – The Built and Historic Environment</p> <p>It is recommended that Design and Policy BOX 7 is dealt with in a separate Chapter ‘Built Environment and Design of New Development’ given the increased importance of design set out within the 2021 revised NPPF. The NPPF sees the creation of high quality, beautiful and sustainable buildings and places as fundamental to what the planning and development process should achieve, with good design being a key aspect of sustainable development (NPPF paragraph 126). As set out within paragraph 127 of the NPPF, Neighbourhood Plans can play an important role in identifying the special qualities of an area and 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.</p> <p>4.24 In the same vein, Policies BOX 8, BOX 9 and BOX 10 should be considered under a new heading ‘Historic Environment’.</p>	It is accepted that the policy needs to be revisited to add in the new NPPF requirements however it is considered appropriate to retain its existing location.	Policy to be amended to reflect latest NPPF.
40	Policy BOX7 The Design of New Development	Hopkins Homes	<p><u>Historic and Built Environment Policies</u></p> <p>Whilst noting the contents of suggested Policy BOX7 – ‘<i>The Design of New Development</i>’ and largely supportive of their aims in ensuring high-quality development results, it will be important that these are expressed flexibly rather than overly-prescriptively, in order that developments can be designed appropriate to their individual circumstances.</p>	Noted	No change to plan
41	Policy BOX 7 Design of new development	Vistry Group	<p>BOX 7 – The Design of New Development</p> <p>As previously mentioned, the production of the Boxford Design Guidelines and Codes Report (AECOM, March 2021) is welcomed. The aspiration of Policy BOX 7 to achieve high quality design that</p>	Noted	No change to Plan

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			respects and contributes positively to the Parish’s local distinctiveness and character is supported.		
42	Policy BOX 7 Design of new development	BDC	<p>The NPPF (July 2021) introduces a number of changes that may be relevant to both supporting text within Chapter 9 and the content of Policy BOX 7. There may be opportunities to amend the NP as a consequence.</p> <p>You should note in particular the attention being given to NPPF para 131 which sets out the important contribution that trees can make to the character and quality of urban environments. Policy BOX 7 already contains references to trees [and hedgerows] but we encourage you to look at recently published NP Examination Reports (e.g., Redgrave) to see if your policy wording could be strengthened further.</p> <p>We note also that para 9.8 still refers to the Design Code being published at Appendix B. As established in para 9.6, this will now be made available as a separate Supporting Document. Para 9.8 should be amended accordingly.</p>	<p>Noted</p> <p>We need to update NPPF references throughout</p>	Policy and plan to be updated accordingly
43	Policy BPX9 NDHA	BDC	<p>Amend para 9.30 to explain that the NDHA assessment is now at Appendix A</p> <p>The Council’s Heritage Team welcome the inclusion of Ashley House as an identified NDHA following their earlier suggestion.</p>	Noted	Amended accordingly
44	Policy BOX10 – Historic Views	Catesby Estates Ltd	<p>Catesby Estates object to the description of View 13 (northwest along Ellis Street) in the draft Neighbourhood Plan where it states “there is not room for a footpath”. This claim fails to acknowledge the footpath proposals submitted by Catesby Estates (in conjunction with the proposals for 64 homes on land east of Sand Hill) which are supported as being safe by the County Highway Authority and an independent safety audit. Reflecting this, reference to insufficient space existing for the footpath is incorrect and should be deleted.</p>	<p>An independent highway assessment commissioned in 2020 concluded that the footpath proposed did not meet the national minimum standard for safe pedestrian movement and the useable highway would be narrowed compromising vehicle</p>	No change to Plan

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				and pedestrian safety and causing drivers to reverse.	
45	BOX 11 Area of Local Landscape Sensitivity	Hopkins Homes	<p>Natural Environment Policies</p> <p>Whilst acknowledging the desire to provide additional protection to the corridor of the River Box under suggested Policy BOX11 – ‘The River Box Area of Local Landscape Sensitivity’ the requirements for such a Policy are now superfluous, with emerging Policy LP19 of the Joint Local Plan now providing a criteria-based assessment when considering all proposals for new development within or adjacent to previously undeveloped valued landscape areas.</p> <p>Given also the difficulty in providing an evidence-based analysis to justify the extent of any such proposed area, it is also strongly suggested that this Policy be omitted. To this end, the current references to such areas within the designation of the area upon the Map entitled ‘Map 12 – River Box Area of Local Landscape Sensitivity’ on Page 76 should also be removed</p>	This is an approach that is consistent with those taken in other NPS and endorsed by examiners and BDC	No change
46	Para 9.31	BDC	Instead of saying ‘ <i>within the policy below</i> ’, we suggest making a direct reference to Policy BOX 10.	Noted	Amended accordingly
47	Policy BOX10 and 12 Historic Views and Scenic Views	SCC	<p><i>Important Views (BOX10 & BOX12)</i></p> <p>Views 8, 9 and 10 of Policy BOX 10 (historic views) may be better placed within Policy BOX 12 Important Public Scenic Views, as they are more nature based and are less focused on the historic built environment. This is, however, a matter of preference.</p> <p>There are a number of viewpoints from Public Rights of Way, however the access to the location of Viewpoint 8 is unclear on Map13.</p>	The matter has been considered and it has been concluded to retain the views in their current position in the Plan.	Footpath references to be included as appropriate

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			<p>Where references are made to viewpoints from footpaths, the policy could specify the number of the route on the Public Rights of Way definitive maps⁴ to minimise any misunderstandings with regards to viewpoint locations.</p> <p>All numberings should be unique throughout to avoid confusion. Historic views could be HV1-HV13, the Scenic views could be SV1-SV9 and Local Green Spaces could be LGS1- LGS14</p>	FP numbers to be included as appropriate	
48	Policy BOX 12 and Map 13 and Policies Map	BDC	<p>We mentioned this previously. The sub-heading on pg 76 reads 'Important Views'. Policy BOX 12 and Map 13 are titled 'Important Public Scenic Views', and the map Key and Policies Map read 'Protected Landscape Views'.</p> <p>Use one description and amend all the above so that they read the same.</p>	Noted Needs amending pending outcome of views review	Amend accordingly
49	Policy BOX13 Protection and Enhancement of Natural Features	SCC	<p><i>Biodiversity</i></p> <p>SCC is welcoming of part m) of Policy BOX7 and Policy BOX13, with the mentions of proposals to 'protect and enhance' biodiversity.</p> <p>It is recommended that 'where practical to do so' is removed from the second paragraph of Policy BOX13, in order to strengthen the protection of biodiversity in this policy.</p>	Noted This is consistent with other NPs	Amend accordingly
50	Policy BOX14 Local Green Spaces	SCC	<p><i>Policy BOX14 – Local Green Spaces</i></p> <p>SCC welcomes the 14 designated Local Green Spaces in Policy BOX14, as this supports the ongoing work to make Suffolk the Greenest County.</p> <p>The table in Appendix B gives data for 16 proposed Local Green Spaces, but does not make a clear judgement for each, whether it is considered to fulfil all three criteria. Only 14 sites are included in the policy, with no rationale given. Therefore, it is recommended that the table in Appendix B include an explanation as to why a site has or has not been designated. This will provide clarity to decision makers using the plan in understanding the evidence base behind the policy.</p>	Noted Need to review the ordering of the appendix	Amend accordingly

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			<p>It would have been helpful, if the numbering of the of the areas in the table could have been carried through to the policy, rather than using letters there. SCC would also suggest that the numbering in Policy BOX14 and Appendix B were to match up for each site, to make cross-referencing easier.</p> <p>Paragraph 10.21 states 'The 14 spaces are shown on Map 15. Assessments for each one against the criteria set out in the NPPF have been carried out and these are shown in Appendix C'. However this should read as '<i>Maps 15a and 15b; and Appendix B</i>'.</p>		
51	Para 10.21	BDC	<p>It may be better to say Map 15a and Map 15b. The last sentence should refer to Appendix B.</p>	Noted	Amended accordingly
52	BOX14 Local Green Spaces	SCC	<p><i>Green Spaces and Facilities</i></p> <p>The provision of the designated Local Green Spaces in the Neighbourhood Plan is welcomed. There are proven links between access to green outdoor spaces and the improvements to both physical and mental health and wellbeing for the population as a whole, including increasing the quality of life for the elderly, working age adults, and for children. We welcome the reference to the physical and mental health and wellbeing benefits that can be gained from access to pleasant outdoor areas, in paragraph 10.19.</p> <p>.</p>	Noted	No change
	BOX 14 Local Green Spaces and Map 15 and b Appendix c	BDC	<p>Policy BOX 14 identifies 15 Local Green Spaces (LGS), listed as sites a) to n). Maps 15a & 15b identify the same 15 LGS's by name only. Appendix B provides justification for 16 LGS's. These are number 1 to 16 and do not appear in the same order as policy BOX 14.</p> <p>All of the above make cross-referencing harder. Use either a letter or number to identify each LGS, make sure that in Policy BOX 14 and in Appendix B they appear in the same order and,</p>	<p>Noted</p> <p>Appendix and cross references need reviewing</p>	Amend the numbering for the LGS to match the Appendix.

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			either delete or move the entry currently shown as #10 (Three tree lined approaches ...) to the very end of Appendix B.		
53	Policy BOX 15 Localised Flooding	BDC	Suggest amending the start of the last paragraph to refer directly to Map 16.	Noted	Amended accordingly
54	Policy BOX15 Localised Flooding	SCC	<p>Flooding</p> <p>Areas of Boxford have historically been affected by flooding, and a study was undertaken jointly between the Environment Agency and Suffolk County Council as the Lead Local Flood Authority. This resulted in a model for some parts of Boxford being produced which is called the “Boxford Initial Assessment for Flood Risk model”. This study has identified some potential areas of land that could be utilised for up-stream storage, which could reduce the flood risk in places like Ash Street, Fen Street. SCC welcomes the detail of surface water and SuDS throughout the plan, and is supportive of Policy BOX15, in particular the requirement for multi-functional use of SuDS to provide amenity, recreation and biodiversity benefits.</p> <p>SCC, as the Lead Local flood Authority, strongly recommends that the plan makes an emphasis that the use of SuDS and water attenuation for developments is absolutely critical, due to the topography of the parish. This could be achieved by amending the first line of BOX15 as follows:</p> <p>“All new development (including minor development) should use appropriate sustainable drainage systems...”</p> <p>The final section of Policy BOX15 states:</p> <p>“The following map shows areas identified as at risk of flooding and proposals for new development which would increase the risk of flooding in these areas, which cannot be mitigated, will not be supported.”</p> <p>Map 16 displays only of the very centre of the village and doesn’t show many areas which could be considered for development in</p>	Noted	Amend

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			<p>the future. Restricting the policy to the contents of that map excludes other areas of risk.</p> <p>SCC would suggest the parish council should:</p> <p>a) increase the size of the map, and</p> <p>b) replace it with a map that zoomed out to include more of the surrounding areas where development could be proposed in the future.</p> <p>Areas to the west, north and north-east of the village are the areas SCC would consider most critical for flood risk and would recommend the plan be explicit about the location of these areas and their associated flood risk.</p>		
55	Policy BOX16 Environmental Design	Hopkins Homes	<p><u>Sustainability and Climate Change Policies</u></p> <p>Whilst similarly noting the contents of suggested Policy BOX16 – ‘<i>Environmental Design</i>’ and largely supportive of their aims in ensuring high-quality development results, it will similarly be important that these are interpreted flexibly rather than overly-prescriptively, in order that those features most appropriate to the specific development and circumstances can be incorporated.</p>	Noted	No change to Plan.
	Policy BOX16	BDC	As already mentioned, we would not be surprised if this policy is modified at the examination stage to only being applicable to non-residential development.	Noted	No change
56	Policy BOX17 and 18 – Existing Services and Facilities and new community infrastructure	SCC	SCC would suggest the inclusion of the need to make green spaces and facilities accessible to residents with limited mobility (inclusion of benches and well-maintained paths etc), into the Community Facilities Policies BOX17 and BOX18. This could help to make an elderly population feel more included as part of the community and reduce isolation of vulnerable groups	Noted	Plan amended accordingly

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57	Para 12.18	BDC	Update or delete the last sentence which reads: '(See Policy BOX 13 – Localised Flooding)' [Nb: the flood policy is now BOX 15].	Noted	Amend numbering
58	Appendix B	BDC	Amend opening text. This should now read: ' ... paragraph 102 of the NPPF (2021).'	Noted	NPPF references to be amended throughout
59	Minerals and Waste	SCC	<p>Minerals and Waste</p> <p>Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means the County Council makes planning policy and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan, adopted in July 2020.</p> <p>The County Council has assessed the neighbourhood plan regarding the safeguarding of potential minerals resources and operating minerals and waste facilities There are no minerals or waste facilities within the parish. The Minerals Consultation Area (which identifies areas of potential sand and gravel resources) covers the whole parish, however due to the small scale of the proposals in the plan SCC has no concerns over minerals safeguarding. As such, SCC has no further comments to make regarding minerals and waste planning issues.</p>	Noted	No change to Plan
60	General and Maps	SCC	<p>General</p> <p>Policies Map: while the colours are consistent throughout the document, they are not easy to read, when brought together on the policies map. The colour of the Area of Local Landscape Sensitivity does not seem to match the key, the Local Green Spaces are too similar in colour to other open green spaces. In describing its setting, the plan could include mention the connection and relationship of Boxford parish and the adjacent Dedham Vale and Stour Valley AONB.</p> <p>Typo: paragraph 10.13 on page 83 states '<i>contains does not contain</i>'</p>	<p>Noted</p> <p>All to be reviewed as a matter of course</p>	Maps to be amended accordingly

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			SCC does not foresee any impact on the neighbourhood plan due to the 2021 changes to the NPPF.		
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Supporting Documents

61	AECOM Site Options and Assessments Report	Vistry Group	<p>There are a number of concerns with the conclusions being drawn from the AECOM report, which are discussed in turn below.</p> <p><i>1. SHELAA Conclusions can be applied</i></p> <p>It is concerning that AECOM are relying on the SHELAA conclusions. The Site was discounted in the SHELAA (Appendix E) for the following reason:</p> <p><i>“No possibility of creating suitable access to the site. Development of the site would result in a loss of designated open space, which is either not surplus to requirements or could not be replaced locally.”</i></p> <p>There is no evidence that BMSDC undertook a full and proper assessment of the Site, and as a result land north of Butcher’s Lane was discounted for incorrect reasons; the site does have a suitable access opportunity and the site does not comprise designated open space when applying the definitions within the Draft JLP.</p> <p>Vistry Group have undertaken technical and environmental assessments of the Site to fully understand the Site’s constraints and opportunities. These assessments have shown this to</p> <p>be a sustainable and deliverable Site. This includes technical highways advice, which has demonstrated that a suitable access to the Site can be achieved from Butcher’s Lane.</p> <p>Furthermore, BMSDC do not appear to have published any evidence base documents that justifies the proposed designation of the Site as open space. The land is in private ownership and does not currently have any formal public</p>	<p>AECOM undertook their own assessments and their own site visit. Their conclusion are their own and independent of BDC</p> <p>This is a matter for BDC not the NP</p>	No change to Plan
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		<p>benefit. As such it is not appropriate for the Site to be designated as open space and Vistry Group is seeking to remove this designation from the Draft JLP. It is anticipated that the proposed designation may have been made in error, due to the proximity to the recreation ground and allotments to the north, and informal, unpermitted use by pedestrians.</p> <p><i>2. Telegraph wires and poles</i> This is a known constraint that can be addressed as part of the detailed design process.</p> <p><i>3. Visual impact</i> The SHELAA conclusions raise concern with the potential visual impact of the Site given that is higher ground than the surrounding area. This can be mitigated through a well thought out and carefully planned development that fully considers and responds appropriately to the landscape and visual impact. How this has been considered in initial work undertaken by Vistry Group is demonstrated through the accompanying Vision Document (Appendix One). Further detailed assessments will continue to inform the emerging proposals, but it is evident from the work undertaken to date that a well-considered approach that is considerate and sensitive to any landscape and visual impacts, as well as other constraints, can be achieved.</p> <p><i>4. Draft JLP green space designation</i> As stated above, the Draft JLP identification of the Site as proposed 'designated open space' is inaccurate. The Site does not fall within any of the four definitions of designated open space set out at Paragraph 16.03 of the supporting text to Draft JLP Policy LP30. This is most notably because the land is within private ownership, in agricultural use and is not open</p>	<p>This is a matter for the JLP</p> <p>AECOM undertook their own site visits and made their own assessment</p>	
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			<p>to the public. An appropriate strategy was not taken by BMSDC to designate the Site as open space, and there are errors in the methodology which mean the approach taken by the Councils is not justified and is unsound. On behalf of Vistry Group, Boyer is seeking for the open space designation error to be rectified through the JLP Examination process.</p> <p>3.14 With the above in mind, it is clear that AECOM have not made a full and proper assessment of the Site informed by publicly available evidence. They have relied upon the BMSDC SHELAA conclusions which are inaccurate, rather than undertaking their own full independent and objective assessment. From the conclusions they have drawn, AECOM do not appear to have read or taken into consideration the representations submitted by Vistry Group to the Regulation 19 Draft JLP consultation, which were in the public domain when the AECOM report was published in August 2021.</p> <p>It is also noted within the AECOM report that the proposed land use for the Site is recorded as 'unknown'. It is concerning that AECOM did not have this information and reiterates that AECOM were not fully aware of the evidence publicly available that has been submitted to date regarding the Site, and could not therefore, have undertaken a full and informed assessment of the Site. The discounting of the Site on the basis of the AECOM report findings is not a robust approach and the Site is evidently less constrained than other sites that have been identified as potentially suitable for full or part development. Without undertaking a thorough and objective assessment of sites for allocation, the draft BNP cannot contribute effectively to sustainable development and does not therefore meet basic condition d.</p>		
62	AECOM Housing	Vistry Group	Boxford Housing Needs Assessment Draft (AECOM, September 2020)	Noted.	No change to Plan

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	Needs Assessment	<p>Whilst the AECOM report is beneficial in researching focussed topic areas relating to affordable housing need, tenure type and size and specialist housing need, it does not appear to consider the overall local housing need in Boxford. On behalf of Vistry Group, Boyer undertook a review of local housing need in Boxford in January 2021. The full review is attached at Appendix Two. The review draws upon the Local Housing Need Assessment undertaken by Lichfields (December 2019) to support the application for up to 64 dwellings at Land East of Sand Hill (ref: DC/20/00330).</p> <p>As set out in detail within Appendix Two, depending upon the local geography analysed and the basis of the calculation, the local housing need for Boxford is estimated to be a minimum of 79 dwellings and potentially 276 dwellings.</p> <p>It is concluded that an appropriate local housing need target would be around the 115 dwellings shown by a local growth scenario.</p> <p>It is therefore evident that there is a current local housing need within Boxford and that new housing should be brought forward to meet this identified need. Taking into consideration the recently approved 64 dwellings at Land East of Sand Hill (it is acknowledged that an application for Judicial Review has been submitted by Boxford Parish Council relating to this permission), there would still be a residual local housing need of 51 dwellings.</p> <p>It is clear that there is an identified housing need beyond that identified in the Draft JLP and this should be accounted for within the BNP. A larger development could successfully accommodate the housing need, with provision included for smaller affordable units and bungalows as identified in the AECOM report. The inclusion of Land north of Butcher's Lane</p>	See also responses relating to school, highways and water constraints and the BDC response	
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			<p>as an allocation within the BNP provides an opportunity for a high-quality development of a range of housing types and sizes with community benefits and it would provide the Neighbourhood Plan group with the control to help shape future development within the village, rather than being subject to speculative developments.</p> <p>Furthermore, it is noted at Paragraph 234 of the AECOM report that it is recommended that the conclusions of the report should be discussed with Babergh District Council. It is not clear from the BNP whether these discussions have taken place other than one reference to affordable housing split at Paragraph 7.36 of the BNP.</p>		
63	AECOM Design Guidelines and Codes	Vistry Group	<p>Boxford Design Guidelines and Codes Final Report (AECOM, March 2021)</p> <p>The production of the Boxford Design Guidelines and Codes Report (AECOM, March 2021) is welcomed in line with NPPF Paragraph 127 which states that <i>“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.”</i></p> <p>In line with the NPPF (paragraph 128) it is important that the design guidelines do not become restrictive and allow a suitable degree of variety where justified.</p>	Noted	No change

