

# **FRAMLINGHAM NEIGHBOURHOOD PLAN 2016 - 2031**

**The Report of the Independent Examiner to Suffolk Coastal District Council on  
the Framingham Neighbourhood Plan**

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9<sup>th</sup> November 2016**

## Summary

I was appointed by Suffolk Coastal District Council in September 2016 to undertake the Independent Examination of the Framlingham Neighbourhood Plan.

The Examination has been undertaken by written representations. I visited the Neighbourhood Area on 17<sup>th</sup> October 2016.

The Neighbourhood Plan proposes a local range of policies and seeks to bring forward positive and sustainable development in the Town. There is an evident focus on safeguarding the very distinctive character of Framlingham whilst accommodating the future growth identified.

The Plan has been underpinned by extensive community support and engagement. The social, environmental and economic issues identified have been brought together into a coherent plan which adds appropriate local detail to sit alongside the Suffolk Coastal District Local Plan.

Subject to a series of recommended modifications set out in this Report I have concluded that the Framlingham Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.

I recommend that the referendum should be held within the Neighbourhood Area.

## Report Index

	<i>Page</i>
Introduction	3
The Role of the Independent Examiner	3
Framlingham Neighbourhood Area	4
Consultation	5
The Neighbourhood Plan	6
Basic Conditions	6
The Plan in Detail:	7
The front cover	7
Foreword	7
Introduction and Background	7
Local Context	8
Vision and Objectives	8
Physical Limits Boundary	9
Housing	10
Landscape and Environment	12
Community Infrastructure	13
Employment & Tourism	15
Transport	16
Framlingham Town Centre	17
Thomas Mills High School Area	17
West Framlingham	19
East Framlingham	20
South Framlingham	21
Central Framlingham	22
Non-Policy Actions, Delivery and Plan Review	23
Proposals Maps	23
Glossary	24
Appendices	24
Other matters raised in representations	25
EU and ECHR Obligations	25
Other Matters	26
Conclusions	27
Listing of Recommendations	28

## **Introduction**

This report sets out the findings of the Independent Examination of the Framlingham Neighbourhood Plan 2016-2031. The Plan was submitted to Suffolk Coastal District Council by Framlingham Town Council in its capacity as the 'qualifying body' responsible for preparing the Neighbourhood Plan.

Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently incorporated within the National Planning Policy Framework (NPPF) in 2012 and this continues to be the principal element of national planning policy.

This report assesses whether the Framlingham Neighbourhood Plan is legally compliant and meets the 'basic conditions' that such plans are required to meet. It also considers the content of the Plan and, where necessary, recommends modifications to its policies and supporting text. This report also provides a recommendation as to whether the Framlingham Neighbourhood Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Framlingham Neighbourhood Plan would then be used to determine planning applications within the Plan boundary as an integral part of the wider development plan.

## **The Role of the Independent Examiner**

The Examiner's role is to ensure that any submitted neighbourhood plan meets the legislative and procedural requirements. I was appointed by Suffolk Coastal District Council, with the consent of the Framlingham Town Council, to conduct the examination of the Framlingham Neighbourhood Plan and to report my findings. I am independent of both the Suffolk Coastal District Council and the Framlingham Town Council. I do not have any interest in any land that may be affected by the Plan.

I possess the appropriate qualifications and experience to undertake this role. I have over 40 years' experience in various local authorities and third sector bodies as well as with the professional body for planners in the United Kingdom. I am a Chartered Town Planner and a panel member for the Neighbourhood Planning Independent Examiner Referral Service (NPIERS). I am a member of the Royal Town Planning Institute.

In my role as Independent Examiner I am required to recommend one of the following outcomes of the Examination:

- the Framlingham Neighbourhood Plan is submitted to a referendum; or
- the Framlingham Neighbourhood Plan should proceed to referendum as modified (based on my recommendations); or
- the Framlingham Neighbourhood Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

If recommending that the Neighbourhood Plan should go forward to referendum, I must then consider whether or not the referendum area should extend beyond the Framlingham Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 Act (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

These are helpfully covered in the submitted Basic Conditions Statement and, subject to the contents of this Report, I can confirm that I am satisfied that each of the above points has been properly addressed and met.

In undertaking this examination I have considered the following documents:

- Framlingham Neighbourhood Plan as submitted
- Framlingham Neighbourhood Plan Basic Conditions Statement.
- Framlingham Neighbourhood Plan Consultation Statement
- Framlingham Neighbourhood Plan Strategic Environmental Assessment Screening Report (October 2015), and
- Sustainability Appraisal incorporating Strategic Environmental Assessment (May 2016)
- Representations made to the Framlingham Neighbourhood Plan
- Content at [www.framlingham.com](http://www.framlingham.com)
- Suffolk Coastal District Local Plan – Core Strategy & Development Management Policies (July 2013)
- “Saved” policies from the old Suffolk Coastal Local Plan 2001
- Suffolk Coastal Site Allocations and Area Specific Policies Local Plan
- Suffolk Coastal District Council statement updating the position with regard to the Suffolk Coastal site allocations document
- National Planning Policy Framework (March 2012)
- Neighbourhood Planning Regulations (2012)
- Planning Practice Guidance (March 2014 and subsequent updates)
- Ministerial Statement March 2015
- Ministerial Statement June 2015.

I carried out an unaccompanied visit to the Plan area on 17<sup>th</sup> October 2016. I looked at the town of Framlingham within the larger Plan area and the rural hinterland. I also viewed the character of the Conservation Area and all the sites identified in the Plan policies.

The legislation establishes that, as a general rule, neighbourhood plan examinations should be held without a public hearing, by written representations only. Having considered all the information before me, including the representations made to the submitted plan which I felt made their points with clarity, I was satisfied that the Framlingham Neighbourhood Plan could be examined without the need for a public hearing and I advised Suffolk Coastal District Council accordingly. The District Council has provided me with a few extra facts to meet my needs.

### **Framlingham Neighbourhood Area**

A map showing the boundary of the Framlingham Neighbourhood Area is provided on page 3 of the Neighbourhood Plan. Further to an application made by Framlingham Town Council, Suffolk Coastal District Council approved the designation of Framlingham as a Neighbourhood Area on 29<sup>th</sup> October 2013. This satisfied the requirement in line with the

purposes of preparing a Neighbourhood Development Plan under section 61G(1) of the Town and Country Planning Act 1990 (as amended).

### **Consultation**

In accordance with the Neighbourhood Planning (General) Regulations 2012, the Town Council has prepared a Consultation Statement, dated June 2016. This records that a Neighbourhood Plan Steering Committee was appointed by the Town Council to progress the plan-making. The Committee has reported back to the Town Council at all decision-making points and that is shown in the records of the meetings of the Town Council.

It is clear that community involvement has been at the heart of the Plan's production. The summary in the Plan and the Consultation Statement itself show a varied and extensive approach to community engagement and the range of approaches and media used to invite participation is impressive. I note in particular that in late 2013 over 2,408 consultation responses were recorded which provided the basis for the development of initial policies and objectives. Then in August 2015, amongst other consultation initiatives, "all 1600 households in Framlingham were hand delivered/posted the Informal Submission Consultation Draft of the [Neighbourhood Plan]" and feedback was requested via a 'tear out' response page also available on the website. In excess of 600 comments have been noted and addressed, as recorded in the Appendix to the Consultation Statement. This degree of commitment by all participants illustrates the potential of neighbourhood planning to give "communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need" (para 183, National Planning Policy Framework).

From all the evidence provided to me for the examination, I can see that an inclusive and comprehensive approach has been made to obtaining the input and opinions of all concerned throughout the process. Comments were pro-actively sought and those received were duly considered. I can see that there has been a documented record of the ways that consultation has benefitted the Framlingham Neighbourhood Plan. I am accordingly satisfied that the consultation process has complied with the requirements of the Regulations.

### **Representations Received**

Consultation on the submitted Plan, in accordance with Neighbourhood Planning Regulation 17, was undertaken by the District Council from 15<sup>th</sup> July to 31<sup>st</sup> August 2016. I have been passed representations received from the following organisations:

- Anglian Water Services
- Historic England
- Natural England

## **The Neighbourhood Plan**

The Framlingham Town Council are to be congratulated on their extensive efforts to produce a Neighbourhood Plan for their area that will guide development activity over the period to 2031. It is evident that a sustained effort has been put into the dialogue with the Framlingham community to arrive at actions and policies that can ensure “Sustainable growth for the whole community”. The Plan document is well presented with a combination of images and text that is engaging for the reader and, subject to the specific points that I make below, set out in logical and clearly themed sections. The Plan has been kept to a manageable length, both by not overextending the coverage of the potential subject matter and also by helpfully combining narrative text and coloured text boxes as appropriate.

Having considered all the evidence and representations submitted as part of the Examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the Neighbourhood Area and promotes policies and growth that are proportionate and sustainable. The Plan sets out the community needs it will meet whilst safeguarding Framlingham’s distinctive features and character. The plan-making had to find ways to reconcile differences of view, in particular on meeting the housing needs identified with Suffolk Coastal District Council in parallel to their own preparation of their Site Allocations Document. All such difficult tasks were approached with transparency and care, with input as required and support from the District Council.

However, in the writing up of the work into the Plan document, it is often the case that the phraseology is imprecise, or it falls short in justifying aspects of the selected policy, and I have been obliged to recommend modifications so as to ensure both clarity and meeting of the ‘basic conditions’. In particular, Plan policies as written may not meet the obligation to “provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (NPPF para 17). I bring this particular reference to the fore because it will be evident as I examine the policies individually and consider whether they meet the ‘basic conditions’.

### **Basic Conditions**

The Independent Examiner is required to consider whether a neighbourhood plan meets the “basic conditions”, as set out in law following the Localism Act 2011. In order to meet the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

The submitted Basic Conditions Statement has very helpfully been set out in the same order as above and, where appropriate, has tabulated the relationship between the policy content of the Plan and its higher tier equivalents. The comprehensive approach to assessing the Plan content is impressive.

I have examined and will below consider the Neighbourhood Plan against all of the Basic Conditions above, utilising the material provided in the Conditions Statement and other available evidence as appropriate.

## **The Plan in Detail**

I will address the aspects of the Neighbourhood Plan content that are relevant to the Examination in the same sequence as the Plan. Recommendations are identified with a bold heading and italics and I have brought them together as a list at the end of the Report.

### **Front cover**

A neighbourhood plan must specify the period during which it is to have effect. I note that there is an early reference to the end date in the Plan at para 1.1, but I believe it would be helpful for the cover to include a clear reference to the period that the Plan will span.

#### ***Recommendation 1:***

*Add "2016-2031" to the cover page title and remove 'Submission Stage Consultation (Regulation 16)'.*

### **Foreword**

Since all consultations are complete the Foreword has become redundant and therefore should be deleted. The helpful pyramid diagram might suitably be relocated and referenced in para 1.5 - see below.

#### ***Recommendation 2:***

*Delete the Foreword and amend the Contents page accordingly.*

## **1. Introduction and Background**

Setting out a brief background to the preparation of the Plan is helpful both to provide a context for the themed sections that follow but also to signpost to related documents with which the Plan ought to be read for completeness. Some modifications ought to be made for accuracy and to ensure that the wording is appropriate for the submission version (rather than for the previous consultations).

1.1 Strictly speaking the development plan documents also include the 'saved policies' from the Suffolk Coastal Local Plan 2001.

#### ***Recommendation 3:***

*Add an appropriate reference to "the 'saved policies' from the Suffolk Coastal Local Plan 2001" in para 1.1.*

1.2 The responsibility for Plan preparation rests with the 'Qualifying Body'.

#### ***Recommendation 4:***

*Correct para 1.2 to read 'Qualifying Body' in place of 'Relevant Body'.*

1.3 The wording here needs to be updated to reflect the fact that the Plan is at submission stage, as does the page header for the whole document.

#### ***Recommendations 5 & 6:***

*Amend para 1.3 to say 'has been prepared' in place of 'is being prepared'.*

*Remove 'Submission Stage Consultation (Reg 16)' from the document header.*

1.4 As correctly stated in para 1.2, the map referenced here is to show the designated Neighbourhood Area and so the reference here and the title to the map (Figure 1.1) need to use those words.



**Recommendation 7:**

*Amend the title of Figure 1.1 and the wording in para 1.4 to say ‘Neighbourhood Area’ in place of ‘Neighbourhood Plan’ area or boundary.*

1.5 As noted above, the helpful pyramid diagram might suitably be relocated and referenced in this paragraph.

**Recommendation 8:**

*Add in para 1.5 a reference to the suitably relocated and numbered (Figure 1.2) process pyramid diagram.*

1.10 This is the appropriate point to cross-refer to the Consultation Statement as a supporting document for the Plan.

**Recommendation 9:**

*Add to para 1.10: “Fuller details are included in the Consultation Statement, available to view through the Framlingham Town website: [www.framlingham.com](http://www.framlingham.com)”.*

1.14 This is the appropriate point to cross-refer to the Basic Conditions Statement as a supporting document for the Plan:

**Recommendation 10:**

*Add a para 1.15: “Further details on the relationship between the 3 levels of planning documents are included in the Basic Conditions Statement, available to view on the Framlingham Town website: [www.framlingham.com](http://www.framlingham.com)”.*

**How to read this document**

This would be a helpful text box if only it were entirely true. The presaged ‘justifications’ for policies are not always clearly identifiable and no actual ‘summary of how each policy contributes toward the objectives of the plan’ has been included. I will make comments on justifications as appropriate as I consider each Policy, but I believe it would be helpful if the promised summaries were devised and included in the final Plan document.

**Recommendation 11:**

*Devise and add a table summarising how each policy contributes toward the Plan objectives.*

**2. Local Context**

2.1 I am advised that the A12 is not designated as a ‘trunk road’ and therefore the reference here to it needs to be amended.

**Recommendation 12:**

*In para 2.1 remove the words ‘major trunk’ so that the end of the paragraph would simply read: “....and the only one west of the A12 road”.*

2.2 As noted in one representation, the term Scheduled Ancient Monument is no longer used.

**Recommendation 13:**

*Amend the reference in para 2.2 to ‘Scheduled Ancient Monument’ to read ‘Scheduled Monument’.*

2.8 I have sympathy with the representation that suggested that the Plan rather underplays the significance of the town’s heritage assets – this may not be so apparent to people who have the benefit of them every day.

**Recommendations 14 & 15:**

Include as Figure 2.1 and reference within para 2.8 the map of the Conservation Area and listed buildings (the boundary of the Conservation Area is defined here: <http://www.eastsuffolk.gov.uk/assets/Planning/Design-and-Conservation/SCDC-Conservation-Area-Appraisals/FramlinghamCAASPDecLoRes2013.pdf>).

Amend the numbering of Figures after the new Figure 2.1 in Section 2.

**3. Vision and Objectives**

3.1 I am sure that the opening of the first bullet point on housing was meant to read 'at least the minimum amount of housing required'.

**Recommendation 16:**

Amend bullet point one in para 3.1 to:

*"Housing – identifying land to accommodate at least the minimum amount of housing required and then the most suitable locations for this, whilst ensuring it addresses the needs of Framlingham."*

3.3 This paragraph seems to relate mostly to completed community participation activity and all but the first sentence can now be deleted from the Plan document.

**Recommendation 17:**

Delete sentences two and three from para 3.3.

**Vision Statement**

I have found myself returning to this Statement to help to provide a context for each Policy in turn; it will be a helpful reference point for the community as the years that the Plan is covering pass by.

**Approach**

3.6 I note that, in accordance with Planning Practice Guidance (ref: 41-004-20140306) the parts of the document that relate to non-land use matters are "clearly identifiable" as Section 16 but I feel that they interrupt the flow of the Plan, coming between the main body and the important paragraphs on 'Delivery and Plan Review'.

**Recommendation 18:**

Move the table setting out non-policy actions from Section 16 to an Annex and amend the reference at para 3.6, the title to Section 16 and the Contents page accordingly.

**4. Physical Limits Boundary**

The general purpose of the 'physical limits boundary' as set out in Policy SP19 in the Suffolk Coastal District Local Plan is upheld here – and a reference to that might usefully be added under the Policy FRAM1 box as is done on other general Policies in the Plan.

I find parts of the wording of para 4.3 misleading or ambiguous in two respects. I can see that the sites were selected through the community consultation and that efforts have been made to ascertain that there is a reasonable certainty that the sites are deliverable and will be built out; reference also ought to be added to the work undertaken to give assurance that the allocated sites represent sustainable development. In allocating land to meet the required level of development, the Plan is showing how Framlingham's needs are being or will be met; the Plan is not internally consistent if it does not accordingly extend the physical limits boundary (as you note should happen in para 4.2) to include *all* the development land on which it is relying over the Plan period (see the Recommendations later under 'Proposals Map' for further detail); the status of the adjacent countryside is not altered by this step. For

clarity, the boundary would not encompass the cemetery (FRAM28) or the education reserve site.

This would also be the appropriate point to include the expectation, presently set out in para 12.8, that the community prefers and the Neighbourhood Plan is seeking to allocate sites that are small or medium in size.

**Recommendations 19, 20 & 21:**

*Rephrase and edit para 4.3 as:*

*“The additional housing growth allocated in this Plan will be delivered on sites that meet the community’s preference for a small or medium size, up to 30 dwellings, since these provide best fit with the scale and grain of the town and its infrastructure. These site allocations reflect the preferred options as consulted upon with the community of Framlingham. The sites were included in the Sustainability Appraisal of the Plan policies (set out in detail in ‘Sustainability Appraisal incorporating Strategic Environmental Assessment May 2016’).”*

*Amend the Policy FRAM1 as:*

*“The development of Framlingham town shall be focused within the physical limits boundary as now defined on the Policies Map.*

*Development proposals within the physical limits boundary will be supported where they are of a size appropriate to the scale and grain of the town (generally sites of up to 30 dwellings) and subject to compliance with the other policies in the development plan.*

*Development proposals outside the physical limits boundary will not be permitted unless:*

- they are in accordance with the Suffolk Coastal Local Plan policies on appropriate uses in the countryside; or*
- they relate to necessary utilities’ infrastructure and where no reasonable alternative location is available.”*

*Add under the FRAM1 Policy box: “Relevant District Core Strategy Policy: SP19”.*

Policy FRAM1 meets the basic conditions.

## **5. Housing**

### **Housing requirements and strategy**

I find the numbers and the combination of the terms ‘in addition’ and ‘excludes’ in para 5.4 most confusing. The significant points are that the District Council is currently expecting that the Neighbourhood Plan will deliver at least 200 dwellings across the years 2015 to 2027 and that, even though the Plan extends to 2031, the planned allocations of additional land offer absolute assurance that this figure can be achieved.

Planning Practice Guidance (ref: 41-009-20160211) says: “Neighbourhood plans should consider ..... allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan”. Thus the Framlingham Plan can be seen to be following good practice.

**Recommendation 22:**

*Rephrase para 5.4 as:*

*“Since this time, Suffolk Coastal District Council has undertaken further work on providing a more detailed indication of the housing requirements for each of the market towns. In April and May 2016, it consulted on its “Site Allocations and Area Specific Policies Local Plan” Proposed Submission Document which contains an indicative figure for Framlingham of 473 dwellings to be delivered over the plan period 2010 to 2027. By 2015 some 273 dwellings had either been built or had the benefit of planning permission, including land at Station Road for some 140 dwellings. This left a minimum of 200 dwellings to be identified through*

*the Neighbourhood Plan. However, two planning consents were granted whilst the Plan was being completed: a recent appeal decision on land at Fairfield Road, although not a site promoted through the neighbourhood plan, will contribute some 163 dwellings; and a permission for 95 dwellings on land south of Mount Pleasant, a site supported in the draft Plan through exceptional circumstances, has already commenced on site. Therefore the minimum indicative housing requirement has already been met although, particularly as this Plan extends beyond 2027 to 2031, there is still a benefit in the Plan identifying and allocating the preferred sites for future growth.”*

As the site to the south of Mount Pleasant (FRAM22) has already commenced there is no value in including it here (indeed the detail may lead to confusion) and so the paragraphs from 5.6 onward need to be brought in line with that (see also my Recommendations later under ‘Proposals Maps’). Further, I note that the detail for Land off Saxtead Road (Policy FRAM20) does assure 30 dwellings over potentially two phases, so it is reasonable to show the total of 30 (not 20-30) for that site.

**Recommendations 23, 24, 25 & 26:**

*Delete para 5.6 (as it essentially repeats 5.4) and renumber subsequent paragraphs.*

*Remove reference to ‘Land south of Mount Pleasant (FRAM 22)’ from the table that follows para 5.8 (and amend the column total), from Policy FRAM2 and from para 5.11.*

*Amend the table that follows para 5.8 to show 30 dwellings for Land off Saxtead Road.*

*Amend the opening sentence of Policy FRAM2 as follows:*

*“Over the period 2015 to 2031, in addition to consents that pre-date this Plan, new residential development will be accommodated on the land now allocated as below, with the detail provided in the related Policy as referenced:.....”*

As amended the Policy FRAM2 meets the basic conditions.

**Housing Mix**

Given the 15 year time horizon of the Plan it is likely that the data informing Policy FRAM3 on housing mix will become outdated and so some accommodation for updating needs to be made.

**Recommendation 27:**

*Amend the final paragraph of Policy FRAM3 as follows:*

*“An alternative dwelling mix will only be permitted where it is demonstrated that more current evidence of need should apply or where the required mix would fundamentally compromise the viability of the development, taking into account other requirements of the development.”*

As amended the Policy FRAM3 meets the basic conditions.

**Residential design**

As written para 5.18 is confused as to the importance of the statutory protections.

**Recommendation 28:**

*Rephrase para 5.18 as:*

*“In a town with such a rich heritage, it is important that new development has appropriate regard for this heritage. The Conservation Area, listed buildings and their settings are protected by national and local policy. However, development outside these areas could still have a significant impact on Framlingham as an historic market town.”*

Para 5.23 potentially misleads as to what pre-application consultation can achieve.

**Recommendation 29:**

Rephrase para 5.23 as:

*“Developers are encouraged to share draft submissions in respect of their Building for Life 12 assessment at a pre-application stage.”*

As with the pre-amble, the Policy FRAM4 wording ought to make specific mention of the Town’s heritage assets.

**Recommendation 30:**

Rephrase Policy FRAM4 as follows:

*“Residential development proposals must demonstrate that they have addressed the requirements of the Building for Life 12 criteria, including appropriate regard for the Town’s heritage assets. Unless there are explicitly justified reasons why it is not possible, developments must achieve ‘excellent/exemplary’ scores for at least 10 of the 12 criteria.”*

As amended the Policy FRAM4 meets the basic conditions.

**Low Energy design and construction**

The Ministerial Statement of March 2015 was clear that “local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development”. Accordingly and to avoid any confusion on the matter, Policy FRAM5 should be deleted.

**Recommendation 31:**

*Delete paras 5.24, 5.25 and Policy FRAM5; renumber subsequent Policies and cross-references and amend the Contents page accordingly.*

**6. Landscape and Environment**

**Protection of important views**

The significance of views is difficult to illustrate successfully; for instance the photographic view of the setting of St Michael’s Church does not include the Church and the view of Market Hill is, necessarily, from only one direction. Para 6.2 and Policy FRAM 6 need to be absolutely clear what view(s) is being referred to and the map at Fig 6.1 ought to be a clearer guide to the protected views of which the photos can give only a partial representation ie there ought to be multiple arrows around the Church setting and a double-ended arrow for views along Market Hill (as well as a better description than merely ‘Market Hill’). The requirement is that the Policy must “provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (NPPF para 17).

**Recommendations 32, 33, 34 & 35:**

*Amend Fig 6.1 and its key to illustrate with directional arrows the views being protected and add a note to qualify the value of the photographs as only limited representations of the views being protected. Incorporate the illustration within the (as renamed) Policies Map.*

*Amend the details relating to each view so as to provide an unambiguous guide to what is being protected eg for View 1 it cannot be realistic to protect the view from along the whole length of College Road which is built up for significant lengths.*

*Amend para 6.7 to refer to ‘Scheduled Monument’ in place of ‘Scheduled Ancient Monument’.*



*Amend Policy FRAM6 to be explicit about the view(s) of Market Hill that is being protected.*

As amended the Policy FRAM6 meets the basic conditions.

### **Local Green Spaces**

The pre-amble to Policy FRAM7 does not present a complete picture of the national policy expectations. The NPPF (para 77) specifies as well as the criteria listed in Plan para 6.15: “The Local Green Space designation will not be appropriate for most green areas or open space...” and Planning Policy Guidance adds: “If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space” (Ref: 37-011-20140306). The justification provided for each site must therefore explicitly address each criterion in turn, including any existing designation.

I cannot conclude – both from the written details and a visual inspection - that an adequate case has been made or is possible for two of the sites as being “*demonstrably special*” and of “*particular local significance*” (my emphases added) and their inclusion could lead to every incidental piece of open ground, more of which are planned in the new developments, being seen as needing the same designation. The two sites which do not meet the Local Green Space criteria are Victoria Mill Road and The Knoll; the planning system more generally will still afford them the appropriate protection.

### **Recommendations 36, 37, 38 & 39:**

*Rewrite para 6.15 to present a complete picture of the national policy context.*

*Delete the sites named as Victoria Mill Road and The Knoll from the Policy FRAM7 and the (as renamed) Policies Map. Number each remaining FRAM7 site within the text to match with the renumbered key to the map at Fig. 6.2. and rewrite the justifications so that each explicitly addresses the four national criteria.*

*Amend the title of Policy FRAM7 to say: “DESIGNATION OF LOCAL GREEN SPACES”.*

*Delete para 6.18 as it does not relate to the Local Green Spaces.*

As amended the Policy FRAM7 meets the basic conditions.

6.18 I am advised that the relevant emerging strategy referred to here is named the ‘Recreation Avoidance and Mitigation Strategy’, being prepared on behalf of four authorities which includes Suffolk Coastal District and which is due for completion March 2017.

### **Recommendation 40:**

*Replace the reference in para 6.18 to ‘Suffolk Coastal Green Infrastructure Strategy’ with “Recreation Avoidance and Mitigation Strategy, being prepared for Suffolk Coast District Council with three other local authorities”.*

## **7. Community Infrastructure**

### **Education**

In the absence of a site specific proposal – although later mention is made of a reserve site – the Policy FRAM8 effectively is the opportunity to provide the local context within which new education proposals will be assessed, but there is little useful detail provided.

### **Recommendations 41 & 42:**

*Add to para 7.2 a cross reference to the reserve site allocation in Section 11.*

*Rewrite Policy FRAM8 as:*

*“Proposals for additional or replacement education facilities (Use Class D1) will be supported where the site:*

- *is well located in relation to existing education facilities and the catchment area served;*
- *has safe and convenient access on foot and cycle; and*
- *accommodates appropriate off-street parking in accordance with Policy FRAM18.”*

As amended the Policy FRAM8 meets the basic conditions.

### **Health**

Again, in the absence of a site specific proposal, the Policy FRAM9 effectively is the opportunity to provide the local context within which new medical facility proposals will be assessed, but there is little useful detail provided.

### **Recommendation 43:**

*Rewrite Policy FRAM9 as:*

*“Proposals for additional or replacement medical facilities (Use Class D1) will be supported where the site:*

- *is well located in relation to the catchment area to be served;*
- *has safe and convenient access on foot and cycle; and*
- *accommodates appropriate off-street parking in accordance with Policy FRAM18.”*

As amended the Policy FRAM9 meets the basic conditions.

### **Community and youth facilities**

The Policy FRAM10 helpfully provides a context for the obligations attached to the later housing site allocation – now singular as a result of the deletion of Policy FRAM 22.

### **Recommendation 44:**

*Omit the reference within Policy FRAM10 to the ‘Land south of Mount Pleasant (Policy FRAM22)’.*

As amended the Policy FRAM10 meets the basic conditions.

### **Community Growing Spaces**

As noted above, Plan policies must “provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (NPPF para 17). The NPPF also requires (para 173) that the sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.

The expectations of Policy FRAM11 are unclear as to the nature and scale – and therefore the potential costs - of the provision being sought; there is also some contradiction between the preamble which ‘encourages’ provision and the Policy which ‘requires’ it. Given that the later site allocation policies already include an obligation to provide a quantum of open space, growing spaces may form part of that provision at the choice of the local community.

### **Recommendations 45 & 46:**

*Include in the pre-amble a suitable reference to more specific guidance eg <http://www.verdantearth.co.uk/community-growing-spaces/>*

*Rewrite Policy FRAM11 as:*

*“As part of the pre-submission community consultation for all development proposals, developers are encouraged to explore with the community the potential for inclusion of a community growing space of a size appropriate to the local community it would serve.”*

As amended the Policy FRAM11 meets the basic conditions.

## **8. Employment and Tourism**

### **General employment areas**

Whilst it is evident that there is support in the Core Strategy for positive policies to update or replace the 'saved policies' that presently sit alongside it, some of the wording in Policy FRAM12 is unnecessarily obscure. I cannot identify any other policy that would justify the "unless otherwise stated" exclusion and a prospective developer would not wish to be faced with that dilemma.

#### **Recommendation 47:**

*Rewrite Policy FRAM12 as:*

*"Proposals for Class B1, B2 & B3 employment uses will be supported, subject to specific site and traffic assessments, at the following locations identified as existing General Employment Areas on the Policies Maps:*

- *Station Road Industrial Estate*
- *Woodbridge Road Industrial Estate*
- *Land between Fairfield Road and Station Road."*

As amended the Policy FRAM12 meets the basic conditions.

### **Incubator/ start-up space**

The case for small-scale business premises has been convincingly made but the wording of the Policy FRAM13 is faulty in some parts:

#### **Recommendation 48:**

*Amend Policy FRAM13 as:*

*"Proposals to provide incubator/start-up business space on flexible terms will be supported, subject to specific site and traffic assessments, through:*

- *conversion of existing buildings across the Plan area; or*
- *provision of new buildings or conversion of existing buildings within the Framlingham physical limits boundary."*

As amended the Policy FRAM13 meets the basic conditions.

### **Tourism**

I note that Core Strategy Policy SP8 recognises the area that includes Framlingham as having potential to absorb additional tourism. With some minor wording amendments Policy FRAM14 will have suitable clarity.

#### **Recommendation 49:**

*Amend Policy FRAM14 as:*

*"The development and expansion of tourism facilities, accommodation, attractions and activities connected with day and residential visitors will be supported where the following criteria can be met:*

- *there are demonstrable economic and social benefits of the proposals; and*
- *there is no significant detrimental impact on the existing community, and*
- *adequate provision for parking is included, particularly for proposals within or adjacent to the town centre; and*
- *for development of accommodation:*
  - *if within the physical limits boundary, there is no detrimental impact upon (i) accessibility for traffic through the town, and (ii) the character or appearance of the conservation area or the setting of any listed building; or*



- *if outside the physical limits boundary, the development is an appropriate use in the countryside.”*

As amended the Policy FRAM14 meets the basic conditions.

## **9. Transport**

### **Walking**

It is very helpful that the Plan has identified the principal network of pedestrian routes that serve the town centre and inter-connect the community facilities. However, it is one thing to raise awareness of the importance of these but quite another to seek to place potentially significant burdens on new construction; certainly the S106 mechanism will rarely be appropriate for this purpose. You note that the Community Infrastructure Levy will become a suitable mechanism, subject to competing demands for available funds. For Policy FRAM15 to be sustainable and “provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (NPPF para 17) there needs to be more clarity and less complexity.

#### **Recommendation 50:**

*Rewrite Policy FRAM15 as:*

*“To help ensure that residents can walk safely to Framlingham town centre, public transport facilities, schools and other important facilities serving the community of Framlingham, Walkway Routes have been shown on the Policies Map. All new developments must ensure safe pedestrian access to link up with existing pavements that directly connect with the Walkway Routes.*

*Proposals to enhance the identified Walkway Routes will be supported. Development that is immediately adjacent to the Walkway Routes will be expected to:*

- *ensure the retention and where possible the enhancement of the Walkway Route; and*
- *not have any detrimental impact on the Walkway Route, and assess and address the impact of the additional traffic movements on the safety and flow of pedestrians.”*

As amended the Policy FRAM15 meets the basic conditions.

### **Cycling**

As worded the Policy FRAM16 meets the basic conditions.

### **Highway pinchpoints**

As noted previously, all policies must “provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency” (NPPF para 17). But Policy FRAM17 goes so far as to say that “proposals.....will be refused” if they, in some way which is undefined, have a “severe impact”. As with the Walking Routes above, it is one thing to raise awareness of the importance of traffic pinchpoints but quite another to seek to place potentially significant burdens solely on new construction. There are established methods for traffic assessments to be made and the highway authority is required to reach and justify conclusions. Accordingly Policy FRAM17 needs to be reworded to ensure that the basic conditions can be met.

#### **Recommendation 51:**

*Rewrite Policy FRAM17 as:*

*“All Transport Assessments (for larger sites) or Transport Statements (for smaller sites) - as required by Para 32 of the National Planning Policy Framework - should address to the satisfaction of the highway authority the cumulative transport impact on road junctions, in particular including the following, identified on Fig. 9.2:*

- Mount Pleasant/College Road
- College Road/Station Road/Bridge Street (Well Close Square)
- Fore Street/Station Road.”

As amended the Policy FRAM17 meets the basic conditions.

### **Parking Standards**

Whilst Policy FRAM18 is generally clear in intent, it could helpfully be simplified:

#### **Recommendation 52:**

*Rewrite Policy FRAM18 as:*

*“Development proposals should be designed to meet the parking standards contained in the Suffolk Advisory Parking Guidance, or any subsequent document; this includes the provision of unallocated/visitor parking spaces and cycle parking spaces.*

*Development that results in the loss of existing off- or on-street parking will be required to re-provide at least the same number of parking spaces in the immediate proximity of where the spaces would be lost.”*

As amended the Policy FRAM18 meets the basic conditions.

### **10. Framlingham Town Centre**

Para 10.5 needs to be amended for accuracy. Policy FRAM19 needs to include a specific reference to its definition of a Town Centre boundary.

#### **Recommendations 53 & 54:**

*Amend para 10.5 to: “Suffolk Coastal Local Plan Saved Policy AP56 (Town Centre) sought to reflect this approach and it is proposed that the wording of this policy is retained but updated to reflect current guidance.”*

*Rewrite Policy FRAM19 as:*

*“In order to offer a choice of modes of transport, particularly for people who do not have the use of a car, Framlingham Town Centre – as defined on the Policies Map - is the preferred location for main town centre uses other than ancillary retail uses or farm shops (para 23 of the NPPF).*

*If for a particular proposal it can be demonstrated that no suitable and viable sites exist in the Town Centre, then sites of the edge of the Town Centre may be considered appropriate, provided they are well connected to the Town Centre.”*

As amended the Policy FRAM19 meets the basic conditions.

### **11. Thomas Mills High School Area**

The map at the beginning of this section needs to be amended to include the new development allocations within the physical limits boundary. I understand that the parcel of land between the housing allocation (FRAM20) and the employment allocation (FRAM21) has the benefit of a 2015 consent for housing (DC13/3234/OUT) and so the boundary can be extended continuously to include all three sites.

#### **Recommendation 55:**

*Amend the map showing the Thomas Mills High School Area to include the new housing and employment development allocations (but not the reserve education site) within the physical limits boundary.*

### **Land off Saxtead Road (opposite Thomas Mills High School)**

As noted in my comments on Section 5 (Housing) above, since the need for parking is acknowledged to be temporary (if at all) then it is appropriate that the site is allocated for up to 30 dwellings, albeit that the total may be reached over two phases. The confusion created by differences between paras 11.8 and 11.9 needs to be resolved. The purpose of the Policy is to allocate land for housing.

**Recommendations 56 & 57:**

Amend para 11.9 to:

*“If the site is to be brought forward for a mix of school parking (approximately 20 spaces) and residential use, then it is expected to be suitable to accommodate approximately 20 dwellings, with the balance of 10 dwellings replacing the parking as phase 2. If however, it is demonstrated that school parking is not required then up to 30 dwellings are possible from the outset. Any development proposal must ensure that a full assessment of the requirement for parking accompanies a planning application. It will also be important that the design of the parking provision considers the amenity of local residents, both existing and from the new housing development.”*

Amend the Policy FRAM20 to:

*“Land off Saxtead Road (opposite Thomas Mills High School) (approximately 0.9 hectares as identified on the Policies Map) is allocated for housing; proposals for up to 30 dwellings incorporating temporary parking for use by the High School will be supported subject to the following criteria:*

- a mix of dwelling sizes is provided in accordance with Policy FRAM3; and*
- the design of the dwellings is in accordance with Policy FRAM4; and*
- affordable housing is provided to meet the requirements of Core Strategy Policy DM2; and*
- up to 20 temporary car parking spaces to serve the needs of the staff of Thomas Mills High School are provided unless it can be demonstrated that this car parking is not required; and*
- the provision of appropriate vehicle and cycle access into the site from the B1119; and*
- the provision of appropriate pedestrian access in accordance with Policy FRAM15; and*
- an assessment of traffic impacts in accordance with Policies FRAM15 & FRAM17; and*
- appropriate landscaping is provided on the southern boundary to ensure that the development does not provide a ‘hard’ urban edge to the entrance to the town; and*
- the retention of the existing mature tree belt along the eastern boundary of the site; and*
- a scheme of archaeological evaluation is provided, followed by appropriate mitigation; and*
- the provision of publicly accessible green space within the site in accordance with the requirements of Strategic Policy SP16 of the Suffolk Coastal Local Plan; and*
- the impact on the setting of the adjacent listed building is assessed and addressed.”*

As amended the Policy FRAM20 meets the basic conditions.

**Land to the west of New Street**

The purpose of Policy FRAM21 is to allocate land for employment.

**Recommendation 58:**

Amend the opening sentence of Policy FRAM21 to:

*“Land to the west of New Street (approximately 2.8 hectares as identified on the Policies Map) is allocated for Class B1 employment uses; suitable proposals will be supported subject to the following criteria:...”*

As amended the Policy FRAM21 meets the basic conditions.

### **Reserve Site: Land to the rear of Thomas Mills School**

It is not clear to me why this particular Policy has been omitted from the numerical referencing system – perhaps it was a late addition? If that was the issue then there are two ways to regularise this.

#### **Recommendations 59 & 60:**

*Either add the content of the Reserve Site Policy, appropriately, within Policy FRAM8 and provide a cross-reference at this point in the Plan;  
Or, make the Reserve Site Policy FRAM22 in place of the now deleted content (see below).*

*Amend para 11.3 to show Suffolk County Council as the “Local Education Authority” not the ‘provider’.*

The Policy as written meets the basic conditions.

## **12. West Framlingham**

### **Land south of Mount Pleasant**

As noted above under Policy FRAM2, as a planning consent for the site has already been granted and, at the time of my visit, construction was proceeding apace this site should be deleted at this point but shown as a site with an existing permission on the Policies Maps – see my Recommendations later under ‘Proposals Maps’.

#### **Recommendations 61, 62 & 63:**

*Delete the heading ‘Land south of Mount Pleasant’ and the related paragraphs 12.2 to 121.8 and Policy FRAM22 and renumber subsequent Policies.*

*Amend the related ‘West Framlingham’ map to delete references to FRAM22 and show the ‘land south of Mount Pleasant’ with a colour and key that matches that used on the Policies Maps (see later Recommendations under ‘Proposals Maps’).*

*Add to the introductory para 12.1 as follows:*

*“The site to the south of Mount Pleasant was granted a planning consent during the preparation of this Plan and construction commenced during 2016.”*

### **Land off Vycès Road/ Brook Lane**

The purpose of the Policy FRAM23 is to allocate land for a community centre and housing. The criteria as stated are confused as to the provision of affordable housing. I note that a planning permission has now been granted for almshouses as the housing element of this site (ref: DC15/0960/FUL) and so the speculative paragraph 12.14 can be deleted.

#### **Recommendations 64 & 65:**

*Delete para 12.14 (and renumber the subsequent paragraph).*

*Amend Policy FRAM23 as:*

*“Land off Vycès Road/ Brook Lane (approximately 0.8 hectares identified on the Policies Map) is allocated for a community centre (Use Class D1) and housing; proposals for a community centre with associated parking and up to 15 dwellings will be supported subject to the following criteria:*

- *the design of the dwellings is in accordance with the requirements of Policy FRAM4; and*
- *the community centre provides a large meeting space and self-contained activity space for youth activities and associated facilities; and*
- *the dwellings are provided as affordable units with a mechanism to retain them in perpetuity for people with a proven local connection to Framlingham, to be secured by a suitable legal agreement; and*
- *the provision of appropriate pedestrian access in accordance with Policy FRAM15; and*
- *an assessment of traffic impacts in accordance with Policy FRAM17; and*
- *the provision of appropriate off-street parking in accordance with Policy FRAM18; and*
- *a scheme of archaeological evaluation is provided, followed by appropriate mitigation.”*

As amended the Policy FRAM23 meets the basic conditions.

### **13. East Framlingham**

#### **The Green Shed, Fore Street**

The purpose of Policy FRAM24 is the reallocation of land for housing. I note that the site borders the Conservation Area and therefore specific mention of that factor ought to be included.

To meet the basic conditions this Policy has to have appropriate regard for national Policy which, after a clarification in the Court of Appeal, exempts sites of 10 dwellings or fewer from the obligation to provide affordable housing (ref: 23b-031-20160519); the NPPF will override any other obligation set down in the Suffolk Coastal Core Strategy; accordingly the affordable housing obligation must be removed.

#### **Recommendation 66:**

*Amend Policy FRAM24 as:*

*“Land at the Green Shed, Fore Street (approximately 0.22 hectares as identified on the Policies Map) is allocated for housing; proposals for up to 8 dwellings will be supported subject to the following criteria:*

- *it provides a mix of dwelling sizes in accordance with Policy FRAM3; and*
- *the design of the dwellings is in accordance with the requirements of Policy FRAM4 and with appropriate regard for the adjacent Conservation Area; and*
- *it provides an appropriate scheme to deal with parking in accordance with Policy FRAM 18; and*
- *a scheme of archaeological evaluation is provided, followed by appropriate mitigation.*

As amended the Policy FRAM24 meets the basic conditions.

#### **Framlingham Cemetery**

The purpose of the Policy FRAM25 is to allocate land for a cemetery.

#### **Recommendation 67:**

*Amend the opening sentence of Policy FRAM25 to:*

*“Land to the south of The Mowbrays (approximately 2.4 hectares as identified on the Policies Map) is allocated for use as an extension to the cemetery to provide additional burial space, subject to a scheme of archaeological evaluation, followed by appropriate mitigation.”*

As amended the Policy FRAM25 meets the basic conditions.



#### **14. South Framlingham**

The map provided in this section needs to be a fair reflection of the policy context and so:

- the land between Station Terrace and Victoria Mill Road should not be identified as a general employment area as there is a consent for housing (already under construction); and
- the land off Fairfield Road with a permission for housing needs to be shown with a colour and key that matches that used on the Policies Maps (see later Recommendations under 'Proposals Maps')..

#### **Recommendation 68:**

*Amend the map for South Framlingham to show the up-to-date land use and physical boundary limit positions:*

- *the land between Station Terrace and Victoria Mill Road should not be identified as a general employment area as there is a consent for housing (already under construction); and*
- *the land off Fairfield Road with a permission for housing needs to be shown with a colour and key that matches that used on the Policies Maps; and*
- *the physical limits boundary needs to include the development allocations made in the Plan.*

#### **Land off Victoria Mill Road**

The purpose of Policy FRAM26 is the allocation of land for housing. Since this site extends the town boundary, is in an area which already has a concentration of new housing and sufficient land has already been allocated beyond the indicative required level, it may be appropriate to select this site for release later in the Plan period ie in the second half from 2026 onward; this could be accommodated as follows (but if an immediate allocation is preferred then simply omit 'for the second half of the Plan period (after 2025)'):

#### **Recommendation 69:**

*Amend Policy FRAM26 as:*

*"Land off Victoria Mill Road (approximately 2.6 hectares as identified on the Policies Map) is allocated for housing for the second half of the Plan period (after 2025); proposals for approximately 30 dwellings will be supported subject to the following criteria:*

- *it provides a mix of dwelling sizes in accordance with Policy FRAM3; and*
- *the design of the dwellings is in accordance with the requirements of Policy FRAM4; and*
- *affordable housing is provided to meet the requirements of Core Strategy Policy DM2; and*
- *if possible, the provision of a Neighbourhood Equipped Area for Play (NEAP); and*
- *the provision of publicly accessible green space within the site in accordance with the requirements of Strategic Policy SP16 of the Suffolk Coastal Local Plan; and*
- *the provision of appropriate vehicle access into the site from Victoria Mill Road; and*
- *the provision of appropriate pedestrian access in accordance with Policy FRAM15; and*
- *an assessment of traffic impacts in accordance with Policy FRAM17; and*
- *the provision of appropriate off-street parking in accordance with Policy FRAM 18; and*
- *a scheme of archaeological evaluation is provided, followed by appropriate mitigation."*

As amended the Policy FRAM26 meets the basic conditions.

#### **Station Terrace**

The purpose of Policy FRAM27 is the reallocation of land for housing.

**Recommendation 70:**

Amend Policy FRAM27 as:

*“Land at the former Station Road allotments (approximately 0.34 hectares as identified on the Policies Map) is allocated for housing; proposals for up to 15 dwellings will be supported subject to the following criteria:*

- it provides a mix of dwelling sizes in accordance with Policy FRAM3; and*
- the design of the dwellings is in accordance with the requirements of Policy FRAM4; and*
- affordable housing is provided to meet the requirements of Core Strategy Policy DM2; and*
- the provision of publicly accessible green space within the site in accordance with the requirements of Strategic Policy SP16 of the Suffolk Coastal Local Plan; and*
- the provision of appropriate vehicle access into the site; and*
- the provision of appropriate pedestrian access in accordance with Policy FRAM15; and*
- an assessment of traffic impacts in accordance with Policy FRAM17; and*
- the provision of appropriate off-street parking in accordance with Policy FRAM18; and*
- a scheme of archaeological evaluation is provided, followed by appropriate mitigation.”*

As amended the Policy FRAM27 meets the basic conditions.

**Land off Woodbridge Road**

The purpose of Policy FRAM28 is the allocation of land for employment uses, the need having been established in Section 8.

**Recommendation 71:**

Amend Policy FRAM28 as:

*“Land off Woodbridge Road (approximately 3.7 hectares as identified on the Policies Map) is allocated for employment uses; proposals for Use Class B employment developments will be supported subject to the following criteria:*

- the introduction of soft landscaping on all boundaries of the site, in particular ensuring that the development has acceptable impact on its setting; and*
- an assessment of traffic impacts in accordance with Policy FRAM17; and*
- the provision of a scheme of archaeological evaluation, followed by appropriate mitigation.”*

As amended the Policy FRAM28 meets the basic conditions.

**15. Central Framlingham****Old Gas Works site, College Road**

The purpose of Policy FRAM29 is the reallocation of land for housing. I note that the site borders the Conservation Area and therefore specific mention of that factor ought to be included.

As noted for Policy FRAM24, to meet the basic conditions Policy FRAM29 has to have appropriate regard for national Policy which, after a clarification in the Court of Appeal, exempts sites of 10 dwellings or fewer from the obligation to provide affordable housing (ref: 23b-031-20160519); the NPPF will override any other obligation set down in the Suffolk Coastal Core Strategy; accordingly the affordable housing obligation must be removed.

**Recommendation 72:**

Amend Policy FRAM29 as:

*“Land at the old Gas Works site, College Road (0.13 hectares as identified on the Policies Map) is allocated for housing; proposals for up to 7 dwellings will be supported subject to the following criteria:*

- the design of the dwellings is in accordance with the requirements of Policy FRAM4, sympathetic to the surrounding dwellings and with appropriate regard to the adjacent Conservation Area; and*
- in this central location a high density development providing small dwellings will be supported and therefore the requirements of Policy FRAM3 will not apply; and*
- the provision of appropriate vehicle access into the site; and*
- the provision of appropriate pedestrian access in accordance with Policy FRAM15; and*
- the provision of appropriate off-street parking in accordance with Policy FRAM18.”*

As amended the Policy FRAM29 meets the basic conditions.

**16. Non-Policy Actions, Delivery and Plan Review**

As I noted earlier, whilst the parts of the document that relate to non-land use matters are “clearly identifiable” within Section 16 (Planning Practice Guidance ref: 41-004-20140306), I feel that they interrupt the flow of the Plan, coming between the main body and the important paragraphs on ‘Delivery and Plan Review’.

**Recommendation 73:**

*Move the table setting out non-policy actions from Section 16 to an Annex and amend the reference at para 3.6, the title to Section 16 and the Contents page accordingly.*

**Proposals Maps**

These maps no longer represent ‘proposals’ but, subject to the outcome of the referendum, are the illustration of the local policies applying in Framlingham; accordingly the maps need to be retitled, as well as being complete and accurate.

The Policies Maps need to show all the land allocations which assure general conformity with the strategic policies in the Local Plan and that the objectively assessed level of housing need is being met; these two sites at Fairfield Road and to the south of Mount Pleasant can be shown as “FRAM2: Land with existing residential consent”.

I note that the maps have not picked up from Policy FRAM6 (as amended by my recommendations).

Changes arising from other earlier recommendations need to be picked up.

**Recommendations 74, 75, 76 & 77:**

*Amend the title on p 73 from ‘Proposals Maps’ to “Policies Maps”.*

*Add on the map the two housing areas (Fairfield Road and to the south of Mount Pleasant) with an existing consent that count toward meeting the local housing requirement; show these on the Key as “FRAM2: Land with existing residential permission”.*

*Incorporate the (amended) illustration of Policy FRAM6.*

*Make the amends arising from earlier Recommendations:*

- alter the line of the ‘physical limits boundary’;*
- add to the key the appropriate Policy number for the Education Reserve Site;*
- remove the two Local Green Spaces that do not match the criteria;*
- remove the General Employment Area off Station Terrace that is now housing.*



## **Glossary**

### **Recommendation 78:**

*Correct the definition of the Local Plan to:*

*“The planning policy document adopted by Suffolk Coastal District Council in 2013. This addresses strategic planning matters and the Framlingham Neighbourhood Plan must be in general conformity with the strategic policies in the Local Plan.*

## **Appendices**

### **Appendix B**

My understanding is that the Framlingham Neighbourhood Plan will supersede more ‘saved policies’ than those listed, namely AP28, AP51, AP138 and AP139.

### **Recommendation 79:**

*Recheck the ‘saved policy’ position with Suffolk Coastal District Council and amend Appendix B to be accurate accordingly.*

## **Other matters raised in representations**

A representation to the consultation on the submitted plan in accordance with Neighbourhood Planning Regulation 17 included suggestions of other matters that the Plan might usefully address. However, a neighbourhood plan must specifically address the development and use of land (Planning Practice Guidance ref: 41-004-20140306). And within that constraint there is no checklist of content that a Neighbourhood Plan must contain or subject matter that it must address; the range of content is entirely at the discretion of the local community and the local issues as they see them. It is not my role as Examiner to test the soundness of a Plan in terms of its coverage but rather to consider the content presented against the Basic Conditions and related requirements. I cannot therefore recommend additional content to the extent suggested.

## **European Union (EU) and European Convention on Human Rights (ECHR) Obligations**

A further Basic Condition, which the Framlingham Neighbourhood Plan must meet, is compatibility with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

There is no legal requirement for a neighbourhood plan to have a sustainability appraisal. However, as the Neighbourhood Plan seeks to allocate land for development, Planning Practice Guidance (11-027) identifies this as one of the limited circumstances where a neighbourhood plan could have significant environmental effects. Accordingly, in line with the Guidance, a Sustainability Appraisal incorporating a Strategic Environmental Assessment (SEA) was carried out on behalf of Framlingham Town Council. The initial Scoping Report (October 2015) was submitted to the statutory environmental bodies (English Heritage, Natural England and the Environment Agency) for consultation and their input was incorporated into revisions that provided the starting point for the Appraisal. In particular representations from Natural England identified that there was potential for significant effect of the Plan on a number of European designated sites. The Suffolk Coastal Core Strategy Appropriate Assessment identified mitigation measures to address adverse effects and Natural England recommended that these measures, as appropriate, should be reflected in the Neighbourhood Plan. The Framlingham Neighbourhood Plan notes the requirement at para 5.10 and subsequent site allocations pick up on the mitigation measures. This matter having been addressed, the SA concluded (May 2016) that the plan policies were unlikely to have significant impacts on the environment.

Through the SA process environmental and sustainability issues were identified and considered. The guidance issued by the Secretary of State, says that an SEA is required to “focus on the environmental impacts which are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan” (Planning Practice Guidance 11-030). Consequently, whilst a neighbourhood plan must be compatible with EU obligations, the content of an SEA supporting it need only be proportionate to the plan itself. Particularly in the absence of any further comments from the statutory bodies or the local planning authority, I can confirm that the SA undertaken was appropriate and proportionate and it confirms that the Plan has sustainability at its heart.

The Framlingham Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998. No evidence has been put forward to demonstrate that this is not the case.

Taking all of the above into account, I am satisfied that the Framlingham Neighbourhood Plan is compatible with EU obligations and that it does not breach, nor is in any way incompatible with the ECHR.

### **Other Matters**

During the course of my Examination I noted a discrepancy between the documents provided to me and the Basic Conditions Statement. The latter refers (para 5.2) to “a screening process in respect of the need for an SEA and a Habitats Regulations Assessment (HRA)” prepared by Suffolk Coastal District Council (SCDC) “included in the submission documents”. On querying this I was advised that this reference was a drafting error and that, in view of the commitment at the start of the plan-making to undertake a full SEA, another document was not required.

#### ***Recommendation 80:***

*Correct the Basic Conditions Statement para 5.2 to omit the reference to a SCDC screening document.*

## Conclusions

This Independent Examiner's Report recommends a range of modifications to the Policies, as well as some of the supporting text and maps, in the Plan. Modifications have been recommended to effect corrections, to ensure clarity and in order to ensure that the basic conditions are met. Whilst I have proposed a significant number of modifications, the Plan itself remains fundamentally unchanged in the role and direction set for it by the Qualifying Body, the Town Council. Where deletions have been recommended because of inappropriate repetition of Local Plan content, the policy requirements within the Suffolk Coastal District Core Strategy will still be effective.

I therefore conclude that, subject to the modifications recommended, the Framlingham Neighbourhood Plan:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- is compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

**On that basis I *recommend* to the Suffolk Coastal District Council that, subject to the incorporation of modifications set out as recommendations in this report, it is appropriate for the Framlingham Neighbourhood Plan to proceed to referendum.**

### Referendum Area

As noted earlier, part of my Examiner role is to consider whether the referendum area should be extended beyond the Plan area. I consider the Neighbourhood Area to be appropriate and no evidence has been submitted to suggest that this is not the case. I therefore ***recommend*** that the Plan should proceed to referendum based on the Neighbourhood Area as approved by the Suffolk Coastal District Council on 29<sup>th</sup> October 2012.

## **Recommendations:** (this is a listing of the recommendations included in the Report)

1. Add “2016-2031” to the cover page title and remove ‘Submission Stage Consultation (Regulation 16)’.
2. Delete the Foreword and amend the Contents page accordingly.
3. Add an appropriate reference to “the ‘saved policies’ from the Suffolk Coastal Local Plan 2001” in para 1.1.
4. Correct para 1.2 to read ‘Qualifying Body’ in place of ‘Relevant Body’.
5. Amend para 1.3 to say ‘has been prepared’ in place of ‘is being prepared’.
6. Remove ‘Submission Stage Consultation (Reg 16)’ from the document header.
7. Amend the title of Figure 1.1 and the wording in para 1.4 to say ‘Neighbourhood Area’ in place of ‘Neighbourhood Plan’ area or boundary.
8. Add in para 1.5 a reference to the suitably relocated and numbered (Figure 1.2) process pyramid diagram.
9. Add to para 1.10: “Fuller details are included in the Consultation Statement, available to view through the Framlingham Town website: [www.framlingham.com](http://www.framlingham.com)”.
10. Add a para 1.15: “Further details on the relationship between the 3 levels of planning documents are included in the Basic Conditions Statement, available to view on the Framlingham Town website: [www.framlingham.com](http://www.framlingham.com)”.
11. Devise and add a table summarising how each policy contributes toward the Plan objectives.
12. In para 2.1 remove the words ‘major trunk’ so that the end of the paragraph would simply read: “...and the only one west of the A12 road”.
13. Amend the reference in para 2.2 to ‘Scheduled Ancient Monument’ to read ‘Scheduled Monument’.
14. Include as Figure 2.1 and reference within para 2.8 the map of the Conservation Area and listed buildings (the boundary of the Conservation Area is defined here: <http://www.eastsuffolk.gov.uk/assets/Planning/Design-and-Conservation/SCDC-Conservation-Area-Appraisals/FramlinghamCAASPDDecLoRes2013.pdf>).
15. Amend the numbering of Figures after the new Figure 2.1 in Section 2.
16. Amend bullet point one in para 3.1 to:  
“Housing – identifying land to accommodate at least the minimum amount of housing required and then the most suitable locations for this, whilst ensuring it addresses the needs of Framlingham.”
17. Delete sentences two and three from para 3.3.
18. Move the table setting out non-policy actions from Section 16 to an Annex and amend the reference at para 3.6, the title to Section 16 and the Contents page accordingly.
19. Rephrase and edit para 4.3 as:  
“The main bulk of growth will be delivered on the site allocations detailed in the policies in Sections 11 to 15. These site allocations reflect the preferred options as consulted upon with the community of Framlingham. The sites were included in the Sustainability Appraisal of the Plan policies (set out in detail in ‘Sustainability Appraisal incorporating Strategic Environmental Assessment May 2016’).”
20. Amend the Policy FRAM1 as:  
“The development of Framlingham town shall be focused within the physical limits boundary as now defined on the Policies Map.  
Development proposals within the physical limits boundary will be supported subject to compliance with the other policies in the development plan.  
Development proposals outside the physical limits boundary will not be permitted unless:
  - they are in accordance with the Suffolk Coastal Local Plan policies on appropriate uses in the countryside; or
  - they relate to necessary utilities’ infrastructure and where no reasonable alternative location is available.”
21. Add under the FRAM1 Policy box: “Relevant District Core Strategy Policy: SP19”.

22. Rephrase para 5.4 as:  
*“Since this time, Suffolk Coastal District Council has undertaken further work on providing a more detailed indication of the housing requirements for each of the market towns. In April and May 2016, it consulted on its “Site Allocations and Area Specific Policies Local Plan” Proposed Submission Document which contains an indicative figure for Framlingham of 473 dwellings to be delivered over the plan period 2010 to 2027. By 2015 some 273 dwellings had either been built or had the benefit of planning permission including land at Station Road for some 140 dwellings. This left a minimum of 200 dwellings to be identified through the Neighbourhood Plan. However, two planning consents were granted whilst the Plan was being completed: a recent appeal decision on land at Fairfield Road, although not a site promoted through the neighbourhood plan, will contribute some 163 dwellings; and a permission for 95 dwellings on land south of Mount Pleasant, a site supported in the draft Plan through exceptional circumstances, has already commenced on site. Therefore the minimum indicative housing requirement has already been met although, as this indicative requirement may yet change and this Plan extends beyond 2027 to 2031, there is still a benefit in the Plan identifying and allocating the preferred sites for future growth.”*
23. Delete para 5.6 (as it essentially repeats 5.4) and renumber subsequent paragraphs.
24. Remove reference to ‘Land south of Mount Pleasant (FRAM 22)’ from the table that follows para 5.8 (and amend the column total), from Policy FRAM2 and from para 5.11.
25. Amend the table that follows para 5.8 to show 30 dwellings for Land off Saxtead Road.
26. Amend the opening sentence of Policy FRAM2 as follows:  
*“Over the period 2015 to 2031, in addition to consents that pre-date this Plan, new residential development will be accommodated on the land now allocated as below, with the detail provided in the related Policy as referenced:.....”*
27. Amend the final paragraph of Policy FRAM3 as follows:  
*“An alternative dwelling mix will only be permitted where it is demonstrated that more current evidence of need should apply or where the required mix would fundamentally compromise the viability of a scheme, taking into account other requirements of the scheme.”*
28. Rephrase para 5.18 as:  
*“In a town with such a rich heritage, it is important that new development has appropriate regard for this heritage. The Conservation Area, listed buildings and their settings are protected by national and local policy. However, development outside these areas could still have a significant impact on Framlingham as an historic market town.”*
29. Rephrase para 5.23 as:  
*“Developers are encouraged to share draft submissions in respect of their Building for Life 12 assessment at a pre-application stage.”*
30. Rephrase Policy FRAM4 as follows:  
*“Residential development proposals must demonstrate that they have addressed the requirements of the Building for Life 12 criteria, including appropriate regard for the Town’s heritage assets. Unless there are explicitly justified reasons why it is not possible, developments must achieve ‘excellent/exemplary’ scores for at least 10 of the 12 criteria.”*
31. Delete paras 5.24, 5.25 and Policy FRAM5; renumber subsequent Policies and cross-references and amend the Contents page accordingly.
32. Amend Fig 6.1 and its key to illustrate with directional arrows the views being protected and add a note to qualify the value of the photographs as only limited representations of the views being protected. Incorporate the illustration within the (as renamed) Policies Map.
33. Amend the details relating to each view so as to provide an unambiguous guide to what is being protected eg for View 1 it cannot be realistic to protect the view from along the whole length of College Road which is built up for significant lengths.
34. Amend para 6.7 to refer to ‘Scheduled Monument’ in place of ‘Scheduled Ancient Monument’.



35. Amend Policy FRAM6 to be explicit about the view(s) of Market Hill that is being protected.
36. Rewrite para 6.15 to present a complete picture of the national policy context.
37. Delete the sites named as Victoria Mill Road and The Knoll from the Policy FRAM7 and the (as renamed) Policies Map. Number each remaining FRAM7 site within the text to match with the renumbered key to the map at Fig. 6.2. and rewrite the justifications so that each explicitly addresses the four national criteria.
38. Amend the title of Policy FRAM7 to say: "DESIGNATION OF LOCAL GREEN SPACES".
39. Delete para 6.18 as it does not relate to the Local Green Spaces.
40. Replace the reference in para 6.18 to 'Suffolk Coastal Green Infrastructure Strategy' with "Recreation Avoidance and Mitigation Strategy, being prepared for Suffolk Coast District Council with three other local authorities".
41. Add to para 7.2 a cross reference to the reserve site allocation in Section 11.
42. Rewrite Policy FRAM8 as:
 

"Proposals for additional or replacement education facilities (Use Class D1) will be supported where the site:

  - is well located in relation to existing education facilities and the catchment area served;
  - has safe and convenient access on foot and cycle; and
  - accommodates appropriate off-street parking in accordance with Policy FRAM18."
43. Rewrite Policy FRAM9 as:
 

"Proposals for additional or replacement medical facilities (Use Class D1) will be supported where the site:

  - is well located in relation to the catchment area to be served;
  - has safe and convenient access on foot and cycle; and
  - accommodates appropriate off-street parking in accordance with Policy FRAM18."
44. Omit the reference within Policy FRAM10 to the 'Land south of Mount Pleasant (Policy FRAM22)'.
45. Include in the pre-amble a suitable reference to more specific guidance eg <http://www.verdantearth.co.uk/community-growing-spaces/>
46. Rewrite Policy FRAM11 as:
 

"As part of the pre-submission community consultation for all development proposals, developers are encouraged to explore with the community the potential for inclusion of a community growing space of a size appropriate to the local community it would serve."
47. Rewrite Policy FRAM12 as:
 

"Proposals for Class B1, B2 & B3 employment uses will be supported, subject to specific site and traffic assessments, at the following locations identified as existing General Employment Areas on the Policies Maps:

  - Station Road Industrial Estate
  - Woodbridge Road Industrial Estate
  - Land between Fairfield Road and Station Road."
48. Amend Policy FRAM13 as:
 

"Proposals to provide incubator/start-up business space on flexible terms will be supported, subject to specific site and traffic assessments, through:

  - conversion of existing buildings across the Plan area; or
  - provision of new buildings or conversion of existing buildings within the Framlingham physical limits boundary."
49. Amend Policy FRAM14 as:
 

"The development and expansion of tourism facilities, accommodation, attractions and activities connected with day and residential visitors will be supported where the following criteria can be met:

  - there are demonstrable economic and social benefits of the proposals; and

- *there is no significant detrimental impact on the existing community, and*
- *adequate provision for parking is included, particularly for proposals within or adjacent to the town centre; and*
- *for development of accommodation:*
  - *if within the physical limits boundary, there is no detrimental impact upon (i) accessibility for traffic through the town, and (ii) the character or appearance of the conservation area or the setting of any listed building; or*
  - *if outside the physical limits boundary, the development is an appropriate use in the countryside.”*

50. Rewrite Policy FRAM15 as:

*“To help ensure that residents can walk safely to Framlingham town centre, public transport facilities, schools and other important facilities serving the community of Framlingham, Walkway Routes have been shown on the Policies Map. All new developments must ensure safe pedestrian access to link up with existing pavements that directly connect with the Walkway Routes.*

*Proposals to enhance the identified Walkway Routes will be supported. Development that is immediately adjacent to the Walkway Routes will be expected to:*

- *ensure the retention and where possible the the enhancement of the Walkway Route; and*
- *not have any detrimental impact on the Walkway Route, and assess and address the impact of the additional traffic movements on the safety and flow of pedestrians.”*

51. Rewrite Policy FRAM17 as:

*“All Transport Assessments (for larger sites) or Transport Statements (for smaller sites) - as required by Para 32 of the National Planning Policy Framework - should address to the satisfaction of the highway authority the cumulative transport impact on road junctions, in particular including the following, identified on Fig. 9.2:*

- *Mount Pleasant/College Road*
- *College Road/Station Road/Bridge Street (Well Close Square)*
- *Fore Street/Station Road.”*

52. Rewrite Policy FRAM18 as:

*“Development proposals should be designed to meet the parking standards contained in the Suffolk Advisory Parking Guidance, or any subsequent document; this includes the provision of unallocated/visitor parking spaces and cycle parking spaces. Development that results in the loss of existing off- or on-street parking will be required to re-provide at least the same number of parking spaces in the immediate proximity of where the spaces would be lost.”*

53. Amend para 10.5 to: *“Suffolk Coastal Local Plan Saved Policy AP56 (Town Centre) sought to reflect this approach and it is proposed that the wording of this policy is retained but updated to reflect current guidance.”*

54. Rewrite Policy FRAM19 as:

*“In order to offer a choice of modes of transport, particularly for people who do not have the use of a car, Framlingham Town Centre – as defined on the Policies Map - is the preferred location for main town centre uses other than ancillary retail uses or farm shops (Para 23 of the NPPF).*

*If for a particular proposal it can be demonstrated that no suitable and viable sites exist in the Town Centre, then sites of the edge of the Town Centre may be considered appropriate, provided they are well connected to the Town Centre.”*

55. Amend the map showing the Thomas Mills High School Area to include the new housing and employment development allocations (but not the reserve education site) within the physical limits boundary.

56. Amend para 11.9 to:



*“If the site is to be brought forward for a mix of school parking (approximately 20 spaces) and residential use, then it is expected to be suitable to accommodate approximately 20 dwellings, with the balance of 10 dwellings replacing the parking as phase 2. If however, it is demonstrated that school parking is not required then up to 30 dwellings are possible from the outset. Any development proposal must ensure that a full assessment of the requirement for parking accompanies a planning application. It will also be important that the design of the parking provision considers the amenity of local residents, both existing and from the new housing development.”*

57. Amend the Policy FRAM20 to:

*“Land off Saxtead Road (opposite Thomas Mills High School) (approximately 0.9 hectares as identified on the Policies Map) is allocated for housing; proposals for up to 30 dwellings incorporating temporary parking for use by the High School will be supported subject to the following criteria:*

- a mix of dwelling sizes is provided in accordance with Policy FRAM3; and*
- the design of the dwellings is in accordance with Policy FRAM4; and*
- affordable housing is provided to meet the requirements of Core Strategy Policy DM2; and*
- up to 20 temporary car parking spaces to serve the needs of the staff of Thomas Mills High School are provided unless it can be demonstrated that this car parking is not required; and*
- the provision of appropriate vehicle and cycle access into the site from the B1119; and*
- the provision of appropriate pedestrian access in accordance with Policy FRAM15; and*
- an assessment of traffic impacts in accordance with Policies FRAM15 & FRAM17; and*
- appropriate landscaping is provided on the southern boundary to ensure that the development does not provide a ‘hard’ urban edge to the entrance to the town; and*
- the retention of the existing mature tree belt along the eastern boundary of the site; and*
- a scheme of archaeological evaluation is provided, followed by appropriate mitigation; and*
- the provision of publicly accessible green space within the site in accordance with the requirements of Strategic Policy SP16 of the Suffolk Coastal Local Plan; and*
- the impact on the setting of the adjacent listed building is assessed and addressed.”*

58. Amend the opening sentence of Policy FRAM21 to:

*“Land to the west of New Street (approximately 2.8 hectares as identified on the Policies Map) is allocated for Class B1 employment uses; suitable proposals will be supported subject to the following criteria:...”*

59. Either add the content of the Reserve Site Policy, appropriately, within Policy FRAM8 and provide a cross-reference at this point in the Plan;

*Or, make the Reserve Site Policy FRAM22 in place of the now deleted content (see below).*

60. Amend para 11.3 to show Suffolk County Council as the “Local Education Authority” not the ‘provider’.

61. Amend the first sentence of para 12.8 to “It should be noted that planning permission has already been granted for this site (planning application ref: DC/15/2759/FUL).”

62. Amend the opening sentence of Policy FRAM 22 to:

*“Land to the south of Mount Pleasant (approximately 2.8 hectares as identified on the Policies Map) is allocated for housing; proposals for up to 95 dwellings will be supported subject to the following criteria:.....”*

63. Delete bullet point 9 relating to the public right of way.

64. Delete para 12.14 (and renumber the subsequent paragraph).

65. Amend Policy FRAM23 as:

*“Land off Vyces Road/ Brook Lane (approximately 0.8 hectares identified on the Policies Map) is allocated for a community centre (Use Class D1) and housing; proposals for a community centre with associated parking and up to 15 dwellings will be supported subject to the following criteria:*

- the design of the dwellings is in accordance with the requirements of Policy FRAM4; and*
- the community centre provides a large meeting space and self-contained activity space for youth activities and associated facilities; and*
- the dwellings are provided as affordable units with a mechanism to retain them in perpetuity for people with a proven local connection to Framlingham, to be secured by a suitable legal agreement; and*
- the provision of appropriate pedestrian access in accordance with Policy FRAM15; and*
- an assessment of traffic impacts in accordance with Policy FRAM17; and*
- the provision of appropriate off-street parking in accordance with Policy FRAM18; and*
- a scheme of archaeological evaluation is provided, followed by appropriate mitigation.”*

66. Amend Policy FRAM24 as:

*“Land at the Green Shed, Fore Street (approximately 0.22 hectares as identified on the Policies Map) is allocated for housing; proposals for up to 8 dwellings will be supported subject to the following criteria:*

- it provides a mix of dwelling sizes in accordance with Policy FRAM3; and*
- the design of the dwellings is in accordance with the requirements of Policy FRAM4 and with appropriate regard for the adjacent Conservation Area; and*
- it provides an appropriate scheme to deal with parking in accordance with Policy FRAM 18; and*
- a scheme of archaeological evaluation is provided, followed by appropriate mitigation.*

67. Amend the opening sentence of Policy FRAM25 to:

*“Land to the south of The Mowbrays (approximately 2.4 hectares as identified on the Policies Map) is allocated for use as an extension to the cemetery to provide additional burial space, subject to a scheme of archaeological evaluation, followed by appropriate mitigation.”*

68. Amend the map for South Framlingham to show the up-to-date land use and physical boundary limit positions:

- the land between Station Terrace and Victoria Mill Road should not be identified as a general employment area as there is a consent for housing (already under construction); and*
- the land off Fairfield Road with a permission for housing needs to be shown with a colour and key that matches that used on the Policies Maps; and*
- the physical limits boundary needs to include the development allocations made in the Plan.*

69. Amend Policy FRAM26 as:

*“Land off Victoria Mill Road (approximately 2.6 hectares as identified on the Policies Map) is allocated for housing for the second half of the Plan period (after 2025); proposals for approximately 30 dwellings will be supported subject to the following criteria:*

- it provides a mix of dwelling sizes in accordance with Policy FRAM3; and*
- the design of the dwellings is in accordance with the requirements of Policy FRAM4; and*

- affordable housing is provided to meet the requirements of Core Strategy Policy DM2; and
- if possible, the provision of a Neighbourhood Equipped Area for Play (NEAP); and
- the provision of publicly accessible green space within the site in accordance with the requirements of Strategic Policy SP16 of the Suffolk Coastal Local Plan; and
- the provision of appropriate vehicle access into the site from Victoria Mill Road; and
- the provision of appropriate pedestrian access in accordance with Policy FRAM15; and
- an assessment of traffic impacts in accordance with Policy FRAM17; and
- the provision of appropriate off-street parking in accordance with Policy FRAM 18; and
- a scheme of archaeological evaluation is provided, followed by appropriate mitigation.”

70. Amend Policy FRAM27 as:

“Land at the former Station Road allotments (approximately 0.34 hectares as identified on the Policies Map) is allocated for housing; proposals for up to 15 dwellings will be supported subject to the following criteria:

- it provides a mix of dwelling sizes in accordance with Policy FRAM3; and
- the design of the dwellings is in accordance with the requirements of Policy FRAM4; and
- affordable housing is provided to meet the requirements of Core Strategy Policy DM2; and
- the provision of publicly accessible green space within the site in accordance with the requirements of Strategic Policy SP16 of the Suffolk Coastal Local Plan; and
- the provision of appropriate vehicle access into the site; and
- the provision of appropriate pedestrian access in accordance with Policy FRAM15; and
- an assessment of traffic impacts in accordance with Policy FRAM17; and
- the provision of appropriate off-street parking in accordance with Policy FRAM18; and
- a scheme of archaeological evaluation is provided, followed by appropriate mitigation.”

71. Amend Policy FRAM28 as:

“Land off Woodbridge Road (approximately 3.7 hectares as identified on the Policies Map) is allocated for employment uses; proposals for Use Class B employment developments will be supported subject to the following criteria:

- the introduction of soft landscaping on all boundaries of the site, in particular ensuring that the development has acceptable impact on its setting; and
- an assessment of traffic impacts in accordance with Policy FRAM17; and
- the provision of a scheme of archaeological evaluation, followed by appropriate mitigation.”

72. Amend Policy FRAM29 as:

“Land at the old Gas Works site, College Road (0.13 hectares as identified on the Policies Map) is allocated for housing; proposals for up to 7 dwellings will be supported subject to the following criteria:

- the design of the dwellings is in accordance with the requirements of Policy FRAM4, sympathetic to the surrounding dwellings and with appropriate regard to the adjacent Conservation Area; and
- in this central location a high density development providing small dwellings will be supported and therefore the requirements of Policy FRAM3 will not apply; and
- the provision of appropriate vehicle access into the site; and

- *the provision of appropriate pedestrian access in accordance with Policy FRAM15; and*
  - *the provision of appropriate off-street parking in accordance with Policy FRAM18.”*
73. *Move the table setting out non-policy actions from Section 16 to an Annex and amend the reference at para 3.6, the title to Section 16 and the Contents page accordingly.*
74. *Amend the title on p 73 from ‘Proposals Maps’ to “Policies Maps”.*
75. *Add on the map the several areas of housing land either completed or with an existing consent that count toward meeting the local housing requirement; show these on the Key as “FRAM2: Land with existing residential permission”.*
76. *Incorporate the (amended) illustration of Policy FRAM6.*
77. *Make the amends arising from earlier Recommendations:*
- *alter the line of the ‘physical limits boundary’;*
  - *add to the key the appropriate Policy number for the Education Reserve Site;*
  - *remove the two Local Green Spaces that did not match the criteria;*
  - *remove the General Employment Area off Station Terrace that is now housing.*
78. *Correct the definition of the Local Plan to:*  
*“The planning policy document adopted by Suffolk Coastal District Council in 2013. This addresses strategic planning matters and the Framlingham Neighbourhood Plan must be in general conformity with the strategic policies in the Local Plan.*
79. *Recheck the ‘saved policy’ position with Suffolk Coastal District Council and amend Appendix B to be accurate accordingly.*
80. *Correct the Basic Conditions Statement para 5.2 to omit the reference to a SCDC screening document.*