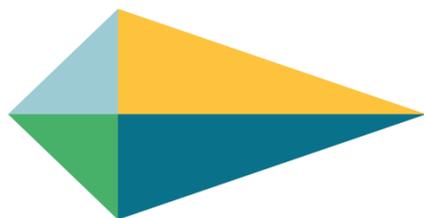


Bredfield Neighbourhood Plan

**Further consultation on correspondence between the Examiner and
the Parish Council**

Published for representations: 22 May to 12 June 2020.



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COUNCIL

What is the purpose of this document?

The independent examination of the Bredfield Neighbourhood Plan commenced in September 2019. As part of the examination an additional consultation was carried out in February and March this year, following which the Examiner has raised some further queries in relation to Policy BDP 9 of the Neighbourhood Plan. Bredfield Parish Council have provided a response to those queries and the correspondence between the Examiner and Council is now being published for an additional period of consultation from **22 May to 12 June 2020**.

Comments can be emailed to: planningpolicy@eastsoffolk.gov.uk or posted to: East Suffolk Council, Planning Policy and Delivery Team (Neighbourhood Plans), Riverside, 4 Canning Road, Lowestoft, Suffolk, NR33 0EQ.

All representations should be headed 'Bredfield Neighbourhood Plan- further consultation' as the subject matter. All comments will be made available to view online as soon as possible after the close of the consultation.

Examiner's queries, 16th April 2020

Dear Laura

I have a further question relating to the proposed allocation for employment use in Policy BDP 9, arising from the comments received in relation to the recent consultation.

Several respondents raise concerns about the access to the site with regard to the width of Boulge Road and the absence of a footpath between the junction at the village pump and the site. I share these concerns, particularly in relation to the width of Boulge Road which is barely wide enough for two cars to the east of the site and effectively single track to the west of it. Also the very acute angle of the junction with Scotts Lane would make left turns from Boulge Road very difficult for large vehicles. Even small scale business development is likely to generate some heavy vehicle movements and these could have implications for road safety and the free flow of traffic. I have seen no comments from the Highways Authority on this development either at the regulation 16 stage or in response to the latest consultation, but am not satisfied that this means that I can conclude that the proposal is acceptable in highway terms. I wonder if any specific consideration has been given to the highways implications, the need for and deliverability of any mitigating works or restrictions on some turning movements and the possible effect of these on the viability of the development of the site.

Kind Regards

Richard High
Independent Examiner

Response to Examiner's queries, 1st May 2020

Dear Mr High,

Thank you for your email with the additional queries related to the proposed allocation for employment use in Policy BDP 9. I have discussed your email with the Neighbourhood Plan group.

On your question regarding input from the Highways Authority, although Suffolk County Council were consulted as part of the Reg 16 consultation and through the latest consultation, no specific discussions have taken place with the Highway Authority in relation to access arrangements for this allocation.

The Neighbourhood Plan group have however, provided some further information in relation to site access which they would like to draw to your attention:

- . Boulge Road is a designated bus route, the number-70 bus using the road several times a day without difficulty, likewise large farm vehicles also use the road.
- . It is probable that the bulk of any traffic to/from the site is more likely to use the A.12 and therefore exit would require a right turn rather than left – which the bus does without any problem. The problem of a left turn is really only relevant for a large vehicle such as an HGV. The companies on the existing site are vehicle maintenance/repair, and do not attract any HGV movements, only light commercial vehicles. Policy BDP.9 includes the requirement that proposals for the site were to be “...small-scale, defined as being Micro-enterprises, i.e. business with up to nine employees” and it is not envisaged that large numbers of HGVs will access the site.
- . Policy BDP.9 also states that any planned development should “...ensure the activities to be undertaken on the premises will not result in significant increase in heavy vehicular traffic on the roads in the vicinity of the premises or elsewhere in and around the parish”.

By way of further background, the Neighbourhood Plan group also wish to provide you with some explanation of the rationale behind the site allocation:

“Although the new site raises the possibility of traffic problems, the proposed new Policy solved an existing, long standing problem. The present business site has little parking available, and customers and delivery vans etc, often have to park in the road. Our Parish Plan (2006) identified this and stated that ... “The business generated around the Forge in Woodbridge Road is causing difficulties - the problem is identified as cars parking in the road, which force motorists to pull over into the other carriageway as they approach a sharp

left hand bend.” (*Bredfield Parish Plan 2006 para 5.5.14*). This generated an Action Point, to resolve the difficulty of parking at the site, which has never been achieved. Moving the location of the site, with the possibility of removing the problem made it attractive.”

I would also like to draw your attention to Policy SCLP12.1 of the East Suffolk Council- Suffolk Coastal Local Plan (final draft January 2019), which sets out minimum housing figures for Neighbourhood Plan areas. The figure for Bredfield is 20 dwellings. The Neighbourhood Plan group have raised some concerns regarding the ability to meet this figure if allocations are removed from the Neighbourhood Plan. The Local Plan is clear that Neighbourhood Plans areas may choose to meet the indicative figure through a combination of allocations and windfalls. If it became apparent that a neighbourhood plan area wasn't able to meet the indicative figure, then it is anticipated that this would be dealt with through the next Local Plan review. For your information, consultation on Modifications to the Local Plan commenced this afternoon and runs for 10 weeks until 10th July. Further details are available here:

<https://suffolkcoastallocalplan.inconsult.uk/consult.ti/mainmodifications2020/>

I hope you find the above useful.

Kind regards,

Laura Mundy

Examiner's response, 4th May 2020

Dear Laura

Many thanks for this reply and the additional helpful information which it provides.

Planning Policy Guidance indicates that for neighbourhood plan policies *“Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn on to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...”* (Reference ID: 41-040-20160211). This is necessary both to allow those wishing to comment on the Plan to understand the reasoning behind it and to facilitate the examination process.

The information which I have now received should therefore have formed part of the reasoned justification included in the submission documents. I am now in possession of information which was not available to those wishing to comment on the Plan and that undermines the openness of the Plan preparation process.

It is therefore necessary for the additional information, together with this email and my email of 16 April to be posted on the East Suffolk website with an opportunity for further comments within a period of three weeks. Those who have made representations should be notified of this opportunity.

I'm sorry that this will cause in a further delay in the examination. I hope you understand why this is necessary and I have kept the consultation period brief to minimise the delay as the amount of additional information is small. If you need any further clarification please do not hesitate to contact me.

Kind Regards

Richard High