



Chris Collison  
Independent Examiner  
By email only: Chris Collison

**Date:** 20<sup>th</sup> July 2022  
**Please ask for:** Ruth Bishop  
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Dear Mr Collison,

### **Letter Seeking Clarification of Matters**

Please see East Suffolk Council's response to your letter dated 6<sup>th</sup> July 2022 below. We have sought to agree responses with Bungay Town Council and have indicated where the responses are agreed.

#### Matter 1 – Call for Sites

Bungay Town Council have shared their proposed response to this matter with East Suffolk Council and we have no objections to the proposed wording. In assessing whether the plan meets the Basic Conditions it is expected that the Examiner will satisfy themselves that the call for sites process described is appropriate and has due regard to the Housing and Economic Land Availability Assessment section of the National Planning Practice Guidance.

#### Matter 2 – Strategic Environmental Assessment

In relation to the Examiner's comments on the SEA, we agree that for Neighbourhood Plans there may be limited scope for alternatives and we appreciate the additional explanation that has been added to the SEA Report (largely paragraphs 74-78) since the July 2021 version which helps to explain this in the context of Bungay. We are of the view however that, related to the Examiner's comments, some acknowledgement could be given to the likely very marginal differences in SEA terms between 65 and 70 dwellings on site BNDP04. We note also that the Examiner has recommended including the Site Assessment Proforma document as an Appendix to the SEA Report. We have no objections to this, and agree this seems a sensible approach. However, the SEA Report does not appear to be fully consistent when explaining the conclusions of the Proforma. Paragraph 69 and Figure 4 suggest that the conclusion for BNDP03 was that it was potentially suitable whereas in fact it received a 'Red' rating. Some brief additional/altered text in paragraph 69 would help to clarify that it is a smaller part of the site that was considered potentially suitable for assessment in the SEA.

In relation to the assessments themselves, it is noted that following the Council's comments on the July 2021 SEA Report, Appendix C was included which shows the detailed assessment of each

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of the policies against the SEA framework and this is welcomed. This relates to the requirement to 'identify, describe and evaluate the likely significant effects', as quoted in the Examiner's note. The inclusion of an equivalent table in the SEA Report would demonstrate that the alternatives have also been assessed against the SEA framework and that this assessment has informed the commentary in paragraphs 79-112, and therefore that the requirements for SEA have been met.

### Matter 3 – Policy H3

Local plan policy WLP8.6 'Affordable Housing in the Countryside' sets out the circumstances when Affordable Housing can be developed outside of the settlement boundaries designated in the local plan (ie. in the countryside). This policy allows for Affordable Housing development adjacent to villages or other rural settlements within the countryside (and Corton). Bungay, being a market town, does not qualify. There are no other means in the local plan for Affordable Housing to be delivered on an exception site basis. Accordingly, rural exception sites, which could deliver Affordable Homes to rent in response to the need established in the neighbourhood plan and the evidence base, cannot come forward in the East Suffolk part of the neighbourhood area under either local or national policy. In testing the need for Affordable Housing routes to home ownership, the neighbourhood plan's Housing Needs Assessment recommends that these make up just 10% of the Affordable Housing tenure split (the remaining 90% being Affordable Housing for rent). As such, this final paragraph of the policy remains at odds with meeting the plan's stated high need for Affordable Homes to rent and is discordant with the middle paragraph of the policy itself.

We have referred Bungay Town Council to another made neighbourhood plan in East Suffolk (the Reydon Neighbourhood Plan) which contains a policy allowing Affordable Housing to take place on the edge of a village where, similar to Bungay, local and national policy would not otherwise allow for this. The Town Council seem to be sympathetic to this type of policy (their pre-submission version of the plan followed a similar approach) and East Suffolk Council would also consider a suitably worded policy of this type in a sympathetic way.

### Matter 4 – Policy H4

A change to 'St Johns Road' is supported.

### Matter 5 – Policy TM1

Support the Town Council's response.

Yours sincerely,

**Ruth Bishop | Senior Planner (Policy and Delivery)**  
East Suffolk Council