

Framlingham Town Council

**Framlingham Neighbourhood
Plan 2016-2031
Basic Conditions Statement**

June 2016

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1 INTRODUCTION

- 1.1 This Basic Conditions Statement has been produced to explain how the proposed Framlingham Neighbourhood Plan (FNP) has been prepared in accordance with the Neighbourhood Planning General Regulations 2015 and how the basic conditions of neighbourhood planning and other considerations as prescribed by Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 have been considered to have been met.
- 1.2 The Statement addresses each of the four 'basic conditions' required of the Regulations and explains how the submitted Neighbourhood Plan meets the requirements of paragraph 8(2) of Schedule 4B to the 1990 Town & Country Planning Act.
- 1.3 The Regulations state that a Neighbourhood Plan will be considered to have met the basic conditions if:
 - having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan;
 - the making of the neighbourhood development plan contributes to the achievement of sustainable development;
 - the making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area); and
 - the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations.

Supporting documents and evidence

- 1.4 The FNP is supported by a Consultation Statement and this Basic Conditions Statement.

Key statements

- 1.5 Framlingham Town Council is a qualifying body and entitled to submit a Neighbourhood Plan for its own parish. The FNP expresses policies that relate to the development and use of land only within the neighbourhood area.
- 1.6 The neighbourhood area is contiguous with the parish boundary, as shown in the map accompanying the neighbourhood area designation application.
- 1.7 The FNP covers the period from 2016 to 2031.
- 1.8 No provision for excluded development such as national infrastructure is contained within the Neighbourhood Plan.
- 1.9 The FNP does not relate to more than one neighbourhood area. It is solely related to the area of Framlingham as designated by Suffolk Coastal District Council on 29th October 2013.
- 1.10 There are no other Neighbourhood Development Plans in place for the Framlingham neighbourhood area.

2 CONFORMITY WITH NATIONAL PLANNING POLICY

Introduction

- 2.1 Framlingham is one of five market towns in Suffolk Coastal district and as such, is expected to make a significant contribution to new housing provision as required in the Core Strategy. As a market town it provides facilities and services to a wider hinterland. The Core Strategy sets out a strategy for Framlingham in Policy SP23. The Neighbourhood Plan implements this strategy.
- 2.2 It is required that the Framlingham Neighbourhood Plan (FNP) has appropriate regard to national planning policy. This is principally provided by the National Planning Policy Framework (NPPF).

National Planning Policy Framework

- 2.3 The NPPF in sections 183-185 refers to Neighbourhood Development Plans and seeks that those plans have regard to the policies in the NPPF and to be in 'general conformity' with the strategic policies of the Local Plan. This phrasing is explained more clearly by the Localism Act which refers to the 'adopted Development Plan'.
- 2.4 This section demonstrates that the FNP has regard to relevant policies within the NPPF in relation to:
- Building a strong, competitive economy
 - Ensuring the vitality of town centres
 - Supporting a prosperous rural economy
 - Promoting sustainable transport
 - Delivering a wide choice of high quality homes
 - Promoting healthy communities
- 2.5 The FNP has six principal objectives. We summarise them in Table 2.1 below and which NPPF goals each objective seeks to address.
- 2.6 Table 2.2 then provides a summary of how each policy in the FNP conforms specifically to the NPPF.

Table 2.1: Assessment of FNP objectives against NPPF goals

FNP Objective	Relevant NPPF goal
Contribute to the Core Strategy district-wide housing requirement and provide for the housing needs of the parish	Delivering a wide choice of high quality homes
Ensure that development is sensitively designed to protect and enrich the landscape, reduce or minimise flood risk, mitigate climate change, promote biodiversity and reduce our carbon footprint	Meeting the challenge of climate change, flooding and coastal change Conserving and enhancing the natural environment
Develop new local facilities for existing and new residents	Promoting healthy communities Promoting sustainable transport
Strengthen, support and promote local economic activity	Building a strong, competitive economy Ensuring the vitality of town centres Supporting a prosperous rural economy
Improve transport and movement, in particular through non-car modes	Promoting sustainable transport
Protect green spaces of value to the community and maintain the high quality natural and historic environment	Conserving and enhancing the natural environment Promoting healthy communities Conserving and enhancing the historic environment

Table 2.2: Assessment of how each policy in the FNP conforms to the NPPF

No.	Policy title and reference	NPPF ref. (para.)	Commentary
1	FRAM1: Framlingham Town physical limits boundary	55, 109	Defines the built up area boundary to ensure consistency with the need to deliver affordable and open market rural homes and to protect the natural landscape beyond the urban edge.
2	FRAM2: Housing strategy	47	Details the strategy for housing growth. Also makes a significant contribution to the district-wide housing requirement (Local Plan Policy SP2).
3	Policy FRAM3: Housing mix	50, 54	Addresses the need for a mix of dwelling sizes – and particularly a greater proportion of smaller dwellings than has been delivered in the past - in order to provide for local needs.
4	Policy FRAM4: Design standards	58, 60, 63, 64	Seeks to ensure that housing development is not out of keeping with the design of surrounding housing, without stifling good or innovative design.
5	Policy FRAM5: Low carbon residential development	94, 95	Seeks to encourage low carbon technologies to be included in the design of new properties.
6	Policy FRAM6: Protection of important views	126	Seeks to ensure that iconic views of key landmarks in the historic town are retained for residents and visitors alike.
7	Policy FRAM7: Protection and maintenance of local green spaces	74, 76, 77	Makes use of the provision for making a designation and applies the site selection criteria.
8	Policy FRAM8: Education provision	37, 72, 162	Seeks to ensure that provision is made for education services to address the needs of the growing population.
9	Policy FRAM9: Health provision	156, 162	Seeks to ensure that provision is made for health services to address the needs of the growing and ageing population.
10	Policy FRAM10: Children's play areas	69, 70	Seeks to ensure that adequate provision is made for play, with specific sites identified to deliver the needs arising from growth.
11	Policy FRAM11: Community growing spaces	69, 73	Seeks to ensure that communities can be more self-sufficient in their food needs and can promote greater social cohesion in new neighbourhoods.

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No.	Policy title and reference	NPPF ref. (para.)	Commentary
12	Policy FRAM12: General employment areas	21	Seeks to protect the existing employment areas of Framlingham to allow for the growth of commercial enterprise over the plan period
13	Policy FRAM13: Incubator/start-up business space	21	Recognises that employment growth of small start-up companies has potential in Framlingham and seeks to provide for this.
14	Policy FRAM14: Tourism-related development and provision of tourist accommodation	28	Seeks to encourage and promote the broadening of the tourist base in terms of activities and also expansion in the range of tourist accommodation to support Framlingham's tourism offer.
15	Policy FRAM15: Pedestrian walkway routes	23, 29, 30, 41	Seeks to improve access to key facilities within Framlingham and ensure that non-car users have alternative routes to the existing road network. Identifies specific key routes to achieve this.
16	Policy FRAM16: Cycle routes and infrastructure	17, 29, 30, 35	Seeks to improve access to key facilities within Framlingham and ensure that non-car users have alternative routes to the existing road network.
17	Policy FRAM17: Highway capacity at key road junctions	30, 32, 35	Seeks to signpost the particular congestion issues that major development could create and ensure that transport assessments accompanying planning applications address these directly to ensure that the cumulative impacts of development are not severe.
18	Policy FRAM18: Parking standards	39	Recognises the impact of on-street parking and seeks to ensure that new development provides for off-street parking commensurate with the comparatively high levels of car ownership in a rural parish. Helps to address the need to maintain emergency routes linked to Sizewell, something unique to Framlingham.
19	Policy FRAM19: Framlingham Town Centre	7, 9, 23, 56, 58, 67	Defines the extent of the town centre and seeks to prevent it from uses that would affect its vitality and viability.
20	Policy FRAM20: Land off Saxtead Road (opposite Thomas Mills High School)	50, 54	Allocates a site for housing on the edge of Framlingham, along with space for parking to alleviate issues at the school over the road
21	Policy FRAM21: Land to the west of New Street	21	Allocates a site for employment uses on the edge of Framlingham

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No.	Policy title and reference	NPPF ref. (para.)	Commentary
22	Reserve site: Land to the rear of Thomas Mills High Schhol	37, 72, 162	Reserves a site to allow expansion of education provision at the end of or beyond the plan period. This would consolidate this location as the education hub in Framlingham.
23	Policy FRAM22: Land south of Mount Pleasant	50, 54	Allocates a site for housing on the edge of Framlingham
24	Policy FRAM23: Land off Vyces Road/Brook Lane	50, 54, 70	Allocates a site for housing in Framlingham along with space for a community centre which is lacking in Framlingham.
25	Policy FRAM24: The Green Shed, Fore Street	50, 54	Allocates a small site for housing in the centre of Framlingham
26	Policy FRAM25: Framlingham Cemetery	70	Allocates land adjacent to the existing cemetery for the expansion of burial provision.
27	Policy FRAM26: Land off Victoria Mill Road	50, 54	Allocates a site for housing on the edge of Framlingham
28	Policy FRAM27: Station Terrace	50, 54	Allocates a site for housing on the edge of Framlingham
29	Policy FRAM28: Land off Woodbridge Road	21	Allocates a site for employment uses on the edge of Framlingham
30	Policy FRAM29: Old Gas Works site, College Road	50, 54	Allocates a small site for housing in the centre of Framlingham

3 CONTRIBUTION TOWARDS SUSTAINABLE DEVELOPMENT

- 3.1 The NPPF states in paragraph 14 that a presumption in favour of sustainable development is at the heart of the NPPF and 'should be seen as a golden thread running through both plan-making and decision-taking.'
- 3.2 Table 3.1 below summarises how the objectives and policies in the FNP contribute towards sustainable development, as defined in the NPPF.

Table 3.1: Assessment of FNP objectives and policies against sustainable development

Deliver Economic Sustainability	
<i>NPPF Definition – 'Contribute to building a strong, responsive economy'</i>	
FNP Objectives	<ul style="list-style-type: none"> Strengthen, support and promote local economic activity Develop new local facilities for existing and new residents
FNP Policies	FRAM12: General employment areas FRAM13: Incubator/start-up business space FRAM14: Tourism-related development and provision of tourist accommodation FRAM19: Framlingham Town Centre FRAM21: Land to the west of New Street FRAM28: Land off Woodbridge Road
FNP Comments	The FNP seeks to enhance the vitality and viability of the town centre, to expand the business base and to increase tourism. In particular it seeks to protect the retail sector in the town and places a focus on the expansion small and medium-sized enterprise businesses (through the allocation of land to the west of New Street and land off Woodbridge Road) and ensuring that their needs are catered for.
Deliver Social Sustainability	
<i>NPPF Definition – 'Support strong vibrant and healthy communities'</i>	
FNP Objectives	<ul style="list-style-type: none"> Develop new local facilities for existing and new residents Improve transport and movement, in particular through non-car modes
FNP Policies	FRAM3: Housing mix FRAM7: Protection and maintenance of local green spaces FRAM8: Education provision FRAM9: Health provision FRAM10: Children's play areas FRAM11: Community growing spaces FRAM15: Pedestrian walkway routes FRAM16: Cycle routes and infrastructure FRAM17: Highway capacity at key road junctions FRAM18: Parking standards FRAM19: Framlingham Town Centre FRAM23: Land off Vyces Road/Brook Lane FRAM25: Framlingham Cemetery
FNP Comments	The FNP seeks to maintain a thriving community within Framlingham, recognising that the community has certain infrastructure needs (particularly in respect of leisure provision) that must be addressed. This it seeks to achieve by allocating sites for a new community centre, seeking to protect existing leisure assets and encouraging walking and cycling. Housing meeting the needs of the local community is supported.

Deliver Environmental Sustainability	
<i>NPPF Definition – 'Contribute to protecting and enhancing our natural, built and historic environment and mitigate and adapt to climate change'</i>	
FNP Objectives	<ul style="list-style-type: none"> • Ensure that development is sensitively designed to protect and enrich the landscape, reduce or minimise flood risk, mitigate climate change, promote biodiversity and reduce our carbon footprint • Protect green spaces of value to the community and maintain the high quality natural and historic environment
FNP Policies	FRAM4: Design standards FRAM5: Low carbon residential development FRAM6: Protection of important views FRAM7: Protection and maintenance of local green spaces FRAM11: Community growing spaces FRAM15: Pedestrian walkway routes FRAM16: Cycle routes and infrastructure
FNP Comments	The FNP seeks to protect the character of the town by requiring good design of new development and by designating certain spaces as local green spaces of importance to the local community. It places a focus on reducing traffic congestion and travel by the private car to reduce carbon emissions.

- 3.3 As demonstrated in Table 3.1, the strategic objectives of the Neighbourhood Development Plan are considered to comprise a balance of social, economic and environmental goals.
- 3.4 A Sustainability Appraisal (SA) has been undertaken to satisfy the requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. While there is no statutory requirement to do so, it was considered prudent to undertake a full SA which takes into consideration the broader economic and social effects of the plan. This was duly undertaken and is provided as part of the supporting documents to the plan.
- 3.5 The SA documents have been submitted along with the other documents required at Regulation 16 stage.

4 GENERAL CONFORMITY WITH THE STRATEGIC POLICIES OF THE DEVELOPMENT PLAN

- 4.1 The development plan currently consists of the following:
- 2013 Suffolk Coastal Local Plan Core Strategy and Development Management Policies
 - 2011 Suffolk Waste Core Strategy
 - 2008 Suffolk Minerals Core Strategy
- 4.2 The policies of relevance are shown in Table 4.1 below, along with a consideration of whether they represent the strategic policies of the development plan. Where they do, consideration is made of whether the FNP is in general conformity with them.
- 4.3 Any policy that is not identified in Table 4.1 is not considered to be relevant to the FNP because the FNP does not have any policies that directly relate to it.
- 4.4 It is confirmed that there are no policies in either the 2008 Suffolk Minerals Local Plan or the 2011 Suffolk Waste Local Plan that the FNP policies have any relevance to.

Table 4.1: Relevant strategic policies in the Suffolk Coastal Development Plan Documents

Local Plan Policy	FNP policy
Suffolk Coastal Core Strategy	
SP2: Housing numbers and distribution	Policy FRAM2 establishes the number of dwellings and the location where they will be delivered. Policy FRAM3 establishes the housing mix Policy FRAM4 provides guidance on acceptable design Policies FRAM20, FRAM22-24, FRAM26-27 and FRAM29 allocate sites for residential development
SP3: New Homes	Policy FRAM2 demonstrates how the stock of properties will be increased Policy FRAM3 establishes the housing mix
SP5: Employment land	Policy FRAM12 seeks to protect key employment areas Policy FRAM13 seeks to develop premises for small-scale businesses Policies FRAM21 and FRAM28 allocate sites for employment development
SP6: Regeneration	Policy FRAM13 seeks to ensure that there is new commercial provision for small businesses Policy FRAM12 seeks to protect key employment areas
SP8: Tourism	Policy FRAM14 seeks to promote a wider tourist base and provide more tourist accommodation
SP11: Accessibility	Policies FRAM15 and 16 seek to improve access for pedestrians and cyclists
SP12: Climate change	Policy FRAM5 seeks to encourage low carbon residential development Policy FRAM11 seeks to encourage local food growing
SP15: Landscape and Townscape	Policy FRAM4 establishes important design principles for new development Policy FRAM6 seeks to protect important views of the townscape and landscape Policy FRAM7 seeks to protect green spaces used by the community
SP16: Sport and Play	Policies FRAM10 and FRAM23 seek to provide more community facilities Policy FRAM7 seeks to protect green spaces used by the community
SP17: Green Space	Policy FRAM7 seeks to protect green spaces used by the community
SP18: Infrastructure	Policies FRAM10 and FRAM23 seek to provide more community facilities Policy FRAM7 seeks to protect green spaces used by the community

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Local Plan Policy	FNP policy
SP23: Framlingham	All of the policies contribute towards addressing the strategic policy framework for Framlingham
DM3: Housing in the countryside; DM4: Housing in clusters in the countryside	Policy FRAM1 establishes the physical limits boundary of the town and what uses are suitable outside the boundary
DM7: Infilling and backland development within Physical Limits Boundaries; DM8: Extensions to residential curtilages	Policy FRAM4 establishes important design principles for new development
DM10: Protection of employment uses	Policy FRAM12 seeks to protect key employment areas
DM17: Touring Caravan, Camper Vans and Camping Sites	Policy FRAM14 seeks to encourage the provision of more tourist accommodation
DM19: Parking standards	Policy FRAM18 sets parking standards
DM22: Design: Function	Policy FRAM4 establishes important design principles for new development Policy FRAM5 seeks to encourage low carbon residential development Policy FRAM15 seeks to improve access for pedestrians Policy FRAM18 sets parking standards
DM32: Sport and Play	Policy FRAM10 seeks to enable the provision of more facilities for young people

5 DOES NOT BREACH, AND IS COMPATIBLE WITH, EU OBLIGATIONS AND HUMAN RIGHTS REQUIREMENTS

- 5.1 The Neighbourhood Development Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act.
- 5.2 The Framlingham Neighbourhood Plan Steering Team took the view early on in the process that a Strategic Environmental Assessment (SEA) was almost certain to be needed. In addition, undertaking this process would assist in the development of the plan. As such, no formal screening request was made of Suffolk Coastal District Council, rather the process of preparing a full Sustainability Appraisal (SA) was simply commenced. However, in order to fulfil its duty, SCDC undertook a screening process in respect of the need for an SEA and a Habitats Regulations Assessment (HRA) and this is included in the submission documents.
- 5.3 The SEA process began with a Scoping Report which identified the baseline characteristics of the Neighbourhood Area followed by a full SA that considered reasonable alternatives. Subsequently minor amendments were made to the SA taking into account comments received during the Pre-Submission Consultation (Regulation 14) period.
- 5.4 The SA concluded that the plan policies were unlikely to have significant impacts on the environment.
- 5.5 Representations from Natural England on the SEA Scoping Process in August 2015 identified that there was the potential for significant effect of the Plan (under the Habitats Regulations Assessment). This related to housing development in Framlingham and the potential adverse effects that the increased population could have on European designated sites including Sandlings Special Protection Area (SPA), Minsmere-Walberswick SPA/Ramsar site and Minsmere to Walberswick Heaths & Marshes Special Area of Conservation (SAC). The Suffolk Coastal Core Strategy Appropriate Assessment¹ was unable to rule out adverse effects on these European sites through increased recreational disturbance as a result of in-combination housing development in the market towns east of Ipswich, including Framlingham. The Appropriate Assessment identified mitigation measures to address these adverse effects including on-site open space provision (particularly to cater for regular users including dog-walkers) and visitor management and monitoring of recreational pressure on the relevant European sites. Natural England recommended that the Neighbourhood Plan reflect these measures as appropriate.
- 5.6 Through the SA process, these matters were taken into account and considered fully. It was determined that, with the necessary changes made to the Neighbourhood Plan document, development would not have a significant adverse effect on the European designated sites.

¹ The Landscape Partnership (2011, modified in 2013) *Appropriate Assessment for Suffolk Coastal Core Strategy and Development Management Policies*, for Suffolk Coastal District Council

6 CONCLUSION

- 6.1 The Basic Conditions as set out in Schedule 4B to the TCPA 1990 are considered to be met by the Framlingham Neighbourhood Plan and all the policies therein. It is therefore respectfully suggested to the Examiner that the Framlingham Neighbourhood Plan complies with Paragraph 8(1)(a) of Schedule 4B of the Act.

