

# **Westerfield Neighbourhood Development Plan 2023-2036**

**A report to East Suffolk Council on the Westerfield  
Neighbourhood Development Plan**

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## **Executive Summary**

- 1 I was appointed by East Suffolk Council in October 2024 to carry out the independent examination of the Westerfield Neighbourhood Development Plan.
- 2 The examination was undertaken by way of written representations. I visited the neighbourhood area on 27 November 2024.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. The Plan includes policies on a Landscape Buffer, a Sensitive Landscape, local green spaces, and important views. The Plan has been prepared in short order.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

**Andrew Ashcroft**  
**Independent Examiner**  
**17 February 2025**

## **1 Introduction**

- 1.1 This report sets out the findings of the independent examination of the Westerfield Neighbourhood Development Plan 2023-2036 ('the Plan').
- 1.2 The Plan was submitted to East Suffolk Council (ESC) by Westerfield Parish Council (WPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises indirectly from my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and setting.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome, the Plan would then be used to determine planning applications within the neighbourhood area and will become part of the wider development plan.

## 2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by ESC, with the consent of WPC, to conduct the examination of the Plan and to prepare this report. I am independent of both ESC and WPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. I have 42 years' experience either in various local authorities at either Head of Planning or Service Director level or more recently as an independent examiner. I am a chartered town planner and have significant experience of undertaking neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

### *Examination Outcomes*

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
  - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
  - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

### *Other examination matters*

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
  - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (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); and
  - the 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.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met subject to the modifications in this report.

### 3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the Design Guidelines and Codes.
- the ESC SEA/HRA screening reports.
- the Landscape Appraisal.
- the Landscape and Biodiversity Evaluation.
- the representations made to the Plan.
- WPC's responses to the clarification note.
- the adopted Suffolk Coastal Local Plan (2018-2036).
- the National Planning Policy Framework (December 2023 and December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 27 November 2024. I looked at its overall character and appearance and at those areas affected by policies in the Plan.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I concluded that the Plan could be examined by way of written representations. I was assisted in this process by the comprehensive nature of many of the representations and the detail within the package of submission documents.

#### *The update of the NPPF*

3.4 The NPPF was updated on 12 December 2024. Paragraph 239 of the NPPF 2024 sets out transitional arrangements for plan-making. It comments that the policies in the Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025.

3.5 On this basis, the examination of the Plan against the basic condition that it should have regard to national policies and advice contained in guidance issued by the Secretary of State is based on the 2023 version of the NPPF. Plainly the Plan was submitted earlier in the year in that context. Where NPPF paragraph numbers are used in this report, they refer to those in the December 2023 version.

3.6 Paragraph 6.2 of this report sets out the full extent of the basic conditions against which a neighbourhood plan is examined.

## 4 Consultation

### *Consultation Process*

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such, the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended), WPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It is underpinned by six more detailed appendices.
- 4.3 Section 2 summarises how WPC consulted on the Plan and engaged with local organisations and statutory bodies. Section 3 provides specific details on the consultation processes that took place on the pre-submission version of the Plan (November 2023 to January 2024).
- 4.4 Section 4 of the Statement summarises the comments received on the pre-submission version of the Plan and how it was refined because of this process. Appendices 4-6 provide details about this matter. The overall package of information helps to describe the way in which the Plan evolved.
- 4.5 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. ESC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

### *Consultation Responses*

- 4.6 Consultation on the submitted plan was undertaken by ESC. It ended on 9 October 2024. This exercise generated representations from the following organisations:
  - Ambury Development
  - Anglian Water
  - East Suffolk Council
  - Environment Agency
  - Historic England
  - Ipswich Borough Council
  - Ipswich School
  - National Grid
  - National Highways
  - Natural England
  - Network Rail
  - Sport England

- Suffolk Constabulary
- Suffolk County Council

- 4.7 Representations were also received from two parishioners, one of which was submitted by a solicitor.
- 4.8 I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

## 5 The Neighbourhood Area and the Development Plan Context

### *The Neighbourhood Area*

- 5.1 The neighbourhood area is the parish of Westerfield. Its population in 2021 was 483 persons. It was designated as a neighbourhood area on 27 September 2021.
- 5.2 Westerfield is a small village situated to the immediate north of Ipswich. The Ipswich to Woodbridge railway line runs in an east to west direction along the southern boundary of the parish. The village sits at the junction of Westerfield Road, Lower Road, and Church Lane. The Saint Mary Magdalene Church, the Village Hall and the Swan PH are key buildings at the heart of the community. Westerfield Hall is located to the immediate north of the village.
- 5.3 The remainder of the parish is predominantly in agricultural use.

### *Development Plan Context*

- 5.4 The development plan for the parish is the Suffolk Coastal Local Plan (2018-2036) and the Suffolk Minerals and Waste Local Plan.
- 5.5 The Local Plan includes a comprehensive range of policies. Policy SCLP 3.2 establishes a settlement hierarchy within which Westerfield is identified as one of a series of Small Villages. Paragraph 3.47 of the Plan advises that large villages and small villages are, in principle, suitable places to accommodate new housing. It also comments that consideration has been given to other factors in determining whether a settlement is a suitable location for additional housing growth, including infrastructure capacity, the existence of suitable sites and consultation responses. Policy SCLP3.3 establishes settlement boundaries for a range of settlements including Westerfield.
- 5.6 Policy SCLP12.23: Land off Lower Road and Westerfield Road (Ipswich Garden Suburb Country Park) allocates two parcels of land as public open space. This land is intended to form part of the country park required to be provided in association with the new Ipswich Garden Suburb, the built area of which is located within the administrative boundary of Ipswich (to the south).
- 5.7 Policy SCLP12.67: Land South of Lower Road, Westerfield allocates 2.45ha of land for the development of approximately 20 dwellings and public open space provision.
- 5.8 The Plan has been prepared within this wider context and has relied on up-to-date information. It also seeks to give a local dimension to the relevant policies in the Local Plan. This is best practice, The approach taken is helpfully captured in the Basic Conditions Statement.

### *Visit to the neighbourhood area*

- 5.9 I visited the neighbourhood area on 27 November 2024. I approached it from the A1214 from Ipswich. This helped me to understand its position in the wider landscape and its accessibility to the strategic road network.



- 5.10 I looked initially at the proposed Local Green Spaces. I saw the two smaller proposed LGSs (LGS3-1 and 3-2) adjacent to the Church and the Village Hall. I then walked along Westerfield Road and looked at the two larger areas (LGS 3-3 and 3-4).
- 5.11 I then walked up the hill to the railway station. In doing so I saw the Business Centre (to the north of the railway) and the Railway Inn (to the south). I also saw the excellent work which had been undertaken at the railway station by the Station Adopters.
- 5.12 I then walked back into Westerfield. I saw the popularity of the Swan Inn. I then looked at the new residential development at the northern end of Fullers Field.
- 5.13 I then walked to the north along Westerfield Road to look at the proposed Sensitive Landscape and the Landscape Buffer. I looked carefully at the relationship between the Sensitive Landscape and Westerfield Hall and Swan's Nest on the western side of Westerfield Road. I also took the opportunity to look at several of the proposed Important Views in this part of the parish.
- 5.14 I then took the opportunity to look at the various identified services and facilities in the village. I saw that they were concentrated along Church Lane and around the Parish Church of St Mary Magdalene and the Village Hall.
- 5.15 I left the neighbourhood area on Lower Road and then drove back to Ipswich via Henley Road. This part of the visit helped me to understand the relationship between the neighbourhood area and Ipswich to the south.

## 6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 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. To comply with 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 in the area;
  - not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023;
  - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings:

### *National Planning Policies and Guidance*

- 6.3 For the purposes of this examination, the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework December 2023 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Westerfield Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and Suffolk Coastal Local Plan;
  - building a strong, competitive economy;
  - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
  - taking account of the different roles and characters of different areas;
  - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
  - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic

needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy, including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies on development and environmental matters.
- 6.8 At a more practical level the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning practice guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. The Guidance also advises that policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted, the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

*Contributing to sustainable development*

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy on parish services and facilities (Policy WFD8). In the social role, it includes policies on local green spaces (Policy WFD3), and on rights of way (Policy WFD9). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on a landscape buffer (Policy WFD1), sensitive landscapes (Policy WFD2), and on design (Policy WFD6). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

*General conformity with the strategic policies in the development plan*

- 6.11 I have already commented in detail on the development plan context in East Suffolk in paragraphs 5.4 to 5.8 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject

to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

#### *Strategic Environmental Assessment*

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, ESC undertook a screening exercise in July 2024 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It concludes that the Plan is unlikely to have a significant effect on the environment and therefore does not require a Strategic Environment Assessment.

#### *Habitats Regulations Assessment*

- 6.15 ESC also prepared a Habitats Regulations Assessment (HRA) of the Plan at the same time. The Assessment addresses the potential impact of the Plan's policies on an extensive range of protected sites listed in its Appendix 3. The Assessment concludes that the neighbourhood plan will not give rise to likely significant effects on these protected sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.
- 6.16 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns on this matter. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this the relevant regulations.

#### *Human Rights*

- 6.17 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

#### *Summary*

- 6.18 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

## 7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the Plan area. The wider community and WPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land. It also includes a series of Community Actions.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan. The Actions are considered briefly thereafter.
- 7.6 For clarity, this section of the report comments on each of the policies in the Plan.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

### *The initial parts of the Plan (Parts 1-4)*

- 7.8 The Plan is well-organised and presented. It has been prepared with much attention to detail and local pride. It makes an appropriate distinction between the policies and their supporting text. The overall format of the Plan, and the associated use of colour, map and excellent photographs results in a very attractive and legible document. If the Plan is made, it will sit comfortably as part of the overall development plan.
- 7.9 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.10 Section 1 comments on the national agenda for neighbourhood plans and the way in which the submitted Plan has been prepared. The process chart is very helpful. It also defines the neighbourhood area (Map 1) and identifies the Plan period. Paragraph 1.4 identifies the themes which provide a broad structure for the Plan.
- 7.11 Section 2 provides information about the neighbourhood area. It provides interesting and comprehensive details which help to set the scene for the eventual policies.
- 7.12 Section 3 comments about the national and the local planning policy contexts which have underpinned the development of the Plan. It helpfully advises about the implications of the adopted Local Plan on the neighbourhood area.

7.13 Section 4 comments on the Plan's Vision and Objectives. The Vision is:

*'To preserve the rural feel of Westerfield; and to enhance the sense of community felt by residents.'*

7.14 Section 5 comments further about the level of development planned for Westerfield in the Local Plan and the submitted Plan's approach to future growth.

7.15 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

#### Policy WFD 1 – Landscape Buffer

7.16 The Plan advises that the context to this policy is that the Landscape Appraisal identified a group of historic buildings beyond the northern edge of the settlement, with considerable heritage value (including Westerfield Hall) that occupy a hilltop location and are set apart from the rest of the village. It also comments that their separation, and outlook over open farmland, is an important part of their significance and they form an important component in views across the wider landscape. The Appraisal recommends that the gap between the Settlement Boundary and these historic buildings and the fields opposite the historic buildings should be protected from development, due to the potential to cause harm to the designated heritage assets.

7.17 The policy defines a Landscape Buffer on Map 5. It comments that the open and undeveloped nature of the area will be maintained to prevent settlement coalescence and, as appropriate, minimise potential harm to designated heritage assets.

7.18 I looked at the proposed Landscape Buffer carefully during the visit. I saw the scale and significance of the heritage assets to the north.

7.19 ESC questions the extent to which the policy looks to protect the setting of historic buildings and/or the prevention of settlement coalescence.

7.20 In its capacity as a landowner, Ipswich School comments that:

*'It is unclear what the Policy is looking to achieve. It is not clear what is meant by a landscape buffer, and whether the Parish is looking for this to be maintained and planted vegetation, or undeveloped. If the Parish are envisaging planting, it is unclear how this will be achieved and who will fund the ongoing maintenance. It is also unclear whether the location of the buffer is indicative or specifically the area defined on Map 5.'*

*'We question the need for the designated landscape buffer in the first place. It is clear that the Neighbourhood Plan does not seek to make any allocations in the village, and no further development will therefore come forward, making the buffer unnecessary. Furthermore, the requirement of the buffer from a heritage perspective is not understood, as neither of the listings of the designated heritage assets Swan's Nest. Westerfield Hall nor the Barn and Outbuildings to south east of Westerfield Hall specifically mention the open fields as important to their setting. We argue that their settings are already well contained through their walled boundaries, with limited views across the fields from within the site.'*

- 7.21 In its response to the clarification note on the intended basis of the policy, WPC advised that:

*‘the Examiner’s attention is drawn to paragraphs 20 and 21 of the Landscape Appraisal that accompanies the Submission Plan. It states that their separation, and outlook over open farmland, is an important part of their significance and they form an important component in views across character area WF2 [Eastern farmlands character area as defined on Map 4 of the Plan].*

*It continues “The openness of the farmland that provides setting to these assets must be protected. Future development should not be directed to this part of the village fringe and any land use change which reduces the undeveloped gap to the village edge should be resisted. In any case, extending the village up beyond the 42m contour is not characteristic of Westerfield and is not appropriate.”*

*From this professionally produced evidence, the buffer is a general concept to maintain the separation between the main built-up area of the village (within the Settlement Boundary) and the group of buildings to the north of the settlement that includes the Grade II\* Westerfield Hall, the Grade II barn and outbuildings of Westerfield Hall, and Grade II Swan’s Nest dwelling. The loss of that buffer, ie the gap between the settlement and the group of buildings would clearly have a significant detrimental impact on the nature and form of the settlement as a whole. Minimising harm on the designated heritage assets is something that is set out in national policy and, whilst the definition of the buffer is not solely to prevent harm to designated heritage assets, development within the buffer would be likely to result in harm to the setting of those assets.’*

- 7.22 I have considered carefully the various comments on the policy and WPC’s responses. Based on all the evidence I am satisfied that the ambition of the policy is appropriate and is underpinned by the details in the Landscape Assessment. In addition, the supporting text highlights the opportunities for a neighbourhood plan to add value to a relevant local plan policy.
- 7.23 In terms of the focus of the policy, I have concluded that it should relate to the prevention of coalescence rather directly or indirectly seeking to safeguard the heritage assets. In this context, I am satisfied that the assets are already adequately protected by national and local planning policies. Based on this conclusion I also recommend that the wording used should be a ‘Green Buffer’ rather than a ‘Landscape Buffer’. In effect, the policy is intending to prevent coalescence rather than requiring landscaping or equivalent works in the identified area. These matters are addressed in a recommended recasting of the first part of the policy. I also recommend a consequential modification to the title of the policy.
- 7.24 I also recommend detailed modifications to the wording used in the second part of the policy to bring the clarity required by the NPPF and to acknowledge the role of a neighbourhood plan in the development management process. Otherwise, I am satisfied that the policy has regard to Section 15 of the NPPF and meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

**Replace the first part of the policy with: ‘A Green Buffer is identified on Map 5. The open and undeveloped nature of the area will be maintained to prevent the coalescence of Westerfield to the south and the group of historic buildings to the north.’**

**In the second part of the policy replace ‘permitted’ with ‘supported’ and in the first and second criteria replace ‘landscape buffer’ with ‘green buffer’**

*Replace the policy title with ‘Green Buffer’*

#### Policy WFD 2 – Sensitive Landscape

- 7.25 This policy consolidates the approach taken in Policy WFD1. It advises that a sensitive landscape area is identified to the east of Westerfield Road and opposite the designated heritage assets at Swan’s Nest and Westerfield Hall. The policy comments that the open and undeveloped nature of this area will be protected to safeguard the setting of the designated heritage assets. It also advises that proposals located in this area, which are otherwise in conformity with Policy SCLP3.3 of the Suffolk Coastal Local Plan, will only be permitted where, through a Landscape and Visual Impact Assessment and a Heritage Impact Assessment, it can be demonstrated that it would not cause significant harm to the landscape and setting of the heritage assets.

- 7.26 I looked at the proposed Sensitive Landscape during the visit. I saw the scale and significance of the heritage assets to the west of the road.

- 7.27 ESC comments on the policy as follows:

*‘Paragraph 2 (of the policy) overrides SCLP3.3 (of the Local Plan), in that the Landscape and Visual Impact Assessment and Heritage Impact Assessment could be used to refuse proposals that would be in accordance with SCLP3.3. In both cases the requirement for a Landscape and Visual Impact Assessment may be excessive for some developments and so should be limited to larger development proposals and not householder applications. This policy also replicates WFD1 and it could be that the two can be rationalised into a single policy. It is also not clear from policy WFD2 how the sensitive landscape area has been defined. The Landscape Appraisal does not explain why this area should receive special protection.’*

- 7.28 I sought comments from WPC on the way in which it had developed the policy and the extent to which the sensitivity of the landscape relates to the potential impact of development proposals on the heritage assets on the western side of Westerfield Road rather than to the inherent landscape quality and/or sensitivity of the land concerned. In its response it advised that:

*‘Land that adjoins and forms setting to heritage assets is sensitive for example the undeveloped farmland that faces Westerfield Hall. Any land use change or development here would have a direct impact on the perceptions of the Hall as a historical rural feature separated from the village edge. The undeveloped quality of the landscape in which it is seen is central to its significance as a Hall farm complex. In all parts of WF2 the landscape is also visually sensitive as it is regularly bisected by roads and footpaths offering views across most of the area. that connects the Withesham*



*Road and By Road. Its gentle topography and only sporadic wooded features means that fairly long views across the parcel. As such, the Landscape Appraisal notes that this area is not the highest quality landscape in the neighbourhood area, but the area identified in the draft Plan as a sensitive landscape clearly has an important role to play in the setting of the nearby heritage assets.'*

- 7.29 I have considered the policy and the comments received very carefully. I am satisfied that the work undertaken on the Landscape Appraisal justifies the approach taken in the policy. There is a particular sensitivity to setting of Westerfield Hall and Swan's Nest. I am also satisfied that the policy complements rather than conflicts with the approach taken in Policy SCLP3.3 of the Local Plan. Plainly one of the important elements of any neighbourhood plan is its opportunity to introduce a bespoke policy in the level of detail which could not be achieved in a local plan.
- 7.30 I have noted ESC's comments about the potentially disproportionate impact of the need for a developer to produce two sets of assessments for minor proposals. I recommend that a proportionate element is introduced in the policy. I also recommend other modifications to the wording of the policy so that it clearly relates to the Sensitive Landscape and achieves its intentions. This will bring the clarity required by the NPPF.
- 7.31 Otherwise I am satisfied that the policy has regard to Section 15 of the NPPF and meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

**Replace the policy with:**

**'The open and undeveloped nature of the Sensitive Landscape as shown on Map 5 will be protected to safeguard the setting of the designated heritage assets. Development proposals located in the Sensitive Landscape which are otherwise in conformity with Policy SCLP3.3 of the Suffolk Coastal Local Plan will only be supported where, through a Landscape and Visual Impact Assessment and a Heritage Impact Assessment proportionate to their scale and nature, it can be demonstrated that they would not cause unacceptable harm to the landscape and setting of the heritage assets.'**

**Policy WFD 3 – Local Green Spaces**

- 7.32 The policy proposes the designation of four Local Green Spaces (LGSs). The approach is underpinned by the details in the Local Green Spaces Appraisal (Appendix 2). The two smaller proposed LGSs (The Paddock WFD3.1 and the Bowls Club WFD3.2) are in the heart of the village. The other two areas (WFD3.3 and 3.4) are larger parcels of land to the south of the village centre. I looked closely at the proposed designations during the visit.
- 7.33 The policy has attracted a series of comment as follows:

ESC – questions the justification for the designation of WFD3.3 and WFD3.4.

Anglian Water - Whilst we do not consider that any operational works or enhancements to our assets should be prevented, it would be helpful if the neighbourhood plan

clarified that this relates to national policy on the Green Belt as set out in para. 107 of the current NPPF (2023).

Ipswich School – (comments) that WFD3.4 be limited to the woodland habitat, as the remainder of the site holds no environmental or conservation designations. Similarly, while WFD3.3 is recognised as an area of some historical significance, the extent of the local green space is considered excessive and does not meet the definition of LGS and should be removed from the Plan.

Mr and Mrs Pipe – object to the designation of WFD3.4 for a series of reasons including that the land concerned does not meet the criteria for the designation of LGS in paragraph 106 of the NPPF.

7.34 Based on the details in Appendix 2 and my own observations, I am satisfied that the two smaller proposed LGSs (WFD3.1 and WFD3.2) meet the criteria in paragraphs 105 and 106 of the NPPF.

7.35 The proposed designation of WFD3.3 and 3.4 raise a broader set of issues. Given the representations received, I sought further advice from WPC on its reasoning for the proposed designations. In its response to the clarification note it advised that:

*‘The two proposed Local Green Spaces were identified, in landscape importance terms, through the preparation of the Landscape Appraisal. However, the Parish Council acknowledges that landscape importance alone does not necessarily mean that the spaces would satisfy the criteria for designation set out in the NPPF. The Parish Council therefore appraised the areas in the light of paragraph 105 of the NPPF (December 2023). It is acknowledged that the Landscape Appraisal notes that, in Section 8 paragraph 7, the Local Green Space designation could “help protect the remaining meadows from development.” However, the Parish Council acknowledges the designation must meet the criteria paragraph 105 and that this is conclusively demonstrated in Appendix 2 of the Plan.’*

7.36 In the circumstances, I address the way in which the two proposed LGS meet the criteria in paragraph 106 of the NPPF both collectively and individually. I am satisfied that both spaces are within reasonably close proximity to Westerfield (paragraph 106a). They are to the immediate south of the village centre. I am also satisfied that at 2.07ha (WD3.3) and 1.45ha (WD3.4) in size they are local in character and not extensive parcels of land (paragraph 106c).

7.37 Appendix 2 comments about the way in which the two sites are demonstrably special to a local community and hold a particular local significance (paragraph 106b). I address the sites separately on this matter

*WFD3.3 Open area west of B1077 and south-west of Fairlands*

7.38 Appendix 2 advises as follows:

- Public access- None

- Ecologically significant- No records of significance but meadowland is likely to provide important habitats as will the established hedgerows that surround the site.
- Historically significant - Historical significance dating back to the Domesday Book.
- Demonstrably special to a local community and holds a particular local significance - Provides an important natural open space and buffer between Westerfield and Ipswich.

7.39 During the visit I noted that the land concerned was a level meadowland to the immediate south of the village centre. The information in the Plan identified that the proposed LGS is located between the two allocated sites in the Local Plan. I did not see anything within the space to suggest that it has an ecological significance beyond that which might normally be found in a meadow on the edge of a village.

7.40 I note the comments made in Appendix 2 and by WPC in its response to the clarification note about the landscape significance of the site and that it provides an important natural open space and buffer between Westerfield and Ipswich. However, I am not convinced that that the designation of the site as a LGS is necessary to secure the separation of Ipswich from Westerfield. This issue is being addressed by ESC and Ipswich Borough Council through the development plan process. In addition, whilst the NPPF provides considerable flexibility for qualifying bodies to demonstrate that proposed LGSs are demonstrably special to a local community and hold a particular local significance on the one hand, the list of examples does not include the role that spaces may make in separating settlements on the other hand. This matter is traditionally addressed in neighbourhood plans by way of the designation of green buffer/areas of separation policies (such as Policy WD1 in the submitted Plan).

7.41 On this basis, I am not satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance. As such I recommend that it is deleted from the policy.

*WFD3.4 Open area east of B1077 between Ash House and The Lodge*

7.42 Appendix 2 advises as follows:

- Public access- None.
- Ecologically significant-Woodland along southern edge is identified as Priority Habitat – Deciduous Woodland.
- Historically significant -No records of significance.
- Demonstrably special to a local community and holds a particular local significance - Provides an important natural open space and buffer between Westerfield and Ipswich

7.43 During the visit I noted that the land concerned was partly overgrown meadow (in its northern part) and partly a woodland belt (in its southern part). I also noted that the proposed LGS is located to the south of the village centre. The information in the Plan identified that the proposed LGS is located to the north of land with planning permission

for residential development. I saw the significance of the tree belt and note from Appendix 2 that it is a Priority Habitat.

- 7.44 I note the comments made in Appendix 2 and by WPC in its response to the clarification note about the landscape significance of the site and that it is an important natural open space and buffer between Westerfield and Ipswich. However, I am not convinced that the designation of the site is necessary to secure the separation of Ipswich from Westerfield. This issue is being addressed by ESC and Ipswich Borough Council through the development plan process. In addition, whilst the NPPF provides considerable flexibility for qualifying bodies to demonstrate that proposed LGSs demonstrably special to a local community and hold a particular local significance on the one hand, the list of examples does not include the role that spaces may make in separating settlements on the other hand. This matter is traditionally addressed in neighbourhood plans by way of green buffer/areas of separation policies (such as Policy WD1 in the submitted Plan).
- 7.45 On this basis I am not satisfied that the proposed LGS is demonstrably special to a local community and holds a particular local significance. As such I recommend that it is deleted from the policy.
- 7.46 The policy takes the matter-of-fact approach to the designation of LGSs as set out in paragraph 107 of the NPPF. With the deletion of WFD3.3 and 3.4 I am satisfied that the policy has regard to Section 8 of the NPPF and meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

**Delete WFD3.3 and WFD3.4 from the policy.**

*Delete WFD3.3 and WFD3.4 from Map 6.*

**Policy WFD 4 - Protection of Important Views**

- 7.47 Map 7 of the Plan identifies Important views from public vantage points, either within the built-up area or into or out of the surrounding countryside. The policy advises that any proposed development should not have a detrimental visual impact on the key landscape and built development features of those views as identified in the Assessment of Important Views. The approach taken is underpinned by the Landscape Appraisal.
- 7.48 The policy has attracted the following comments:

Ambury Developments - raise concerns as to the value of identifying views 5, 9a and 9b in the Neighbourhood Plan and question whether the policy is in accordance with the policies of the Local Plan.

ESC - suggests that the policy should refer to 'significant' rather than 'important' views and it should state that the development should not have a significantly detrimental impact rather than simply detrimental impact which could be very wide.

Ambury Development - The important views identified in the Plan differ from the ones identified in the Design Guide Codes. These views have been identified by villagers

and should represent the views that are important to local people. It is disappointing that this is not the evidence that supports policy WFD 4, but rather the Landscape Appraisal (2022) which has been prepared by Lucy Batchelor-Wylam. The Plan identifies many and wide important viewpoints, covering most, if not all, of the undeveloped area of the Parish. The excessive number of viewpoints reduce their value and conflict with the Local Plan as they restrict development in too much of the Parish. Important Viewpoints 6 and 7 provide short views over the same field, and their importance is questioned.

7.49 In its response to the clarification note on these matters, WPC commented that:

*‘The neighbourhood plan views have specifically been informed on a professional basis as part of the Landscape Appraisal and the approach to their identification and inclusion is set out in section 6 of the Appraisal. Given that the assessment of the key features of these views is set out in the Landscape Appraisal, they have been included in the Neighbourhood Plan. Conversely, the Design Guidelines and Codes includes views which were identified by the community during the Residents’ Survey, which is not a professionally assessed approach. Some views are duplicated in the Landscape Appraisal but, given the primacy of the Neighbourhood Plan policy and its reference to Map 7, it is clear that the views identified in the Design Guidelines and Codes do not have weight in the Plan. The Examiner may wish to clarify this through suggesting that the Design Guidelines and Codes include a statement to note that the views do not have a status in the Plan.*

*The approach to identifying important views has been demonstrated, through the Basic Conditions Statement, not to conflict with the strategic policies of the Local Plan or the National Planning Policy Framework. In the case of the latter, this remains the case with the December 2024 publication of a revised NPPF. The policy does not block development but states that “Any proposed development should not have a detrimental visual impact on the key landscape and built development features of those views”*

7.50 I have considered the various issues and comments very carefully.

7.51 I note that the views identified in the policy relate those identified in the Landscape Appraisal. Whilst there is a degree of overlap with the views identified in the Design Guidance and Codes, WPC has advised about the way in which that work was undertaken. I recommend that the Design Guidance and Codes is modified to clarify this matter. For clarity, I have examined this policy against the information contained in the Plan and in the Landscape Appraisal.

7.52 In general terms I am satisfied that the Important Views have been chosen in a well-considered way based on the work undertaken in the Landscape Appraisal. I am also satisfied that the number of views is proportionate to a rural parish and to the relationship between its built development and the surrounding countryside.

7.53 Plainly the identification of Important Views may have a bearing on future development proposals. However, I am satisfied that the approach taken in the Plan does not prevent sustainable development in the neighbourhood area. I have reached this conclusion for two principal reasons. The first is that the Important Views do not conflict

with any development proposed in the development plan or which has planning permission. The second is that the policy provides an opportunity for development proposals to demonstrate that they can be satisfactorily accommodated into a site which is affected by one of the identified views. Nevertheless, I recommend that the final sentence of the policy is modified so that its approach is positive (setting out what a developer needs to achieve) rather than negative (commenting about a development proposal not having a detrimental visual impact on the character of an affected view). This approach will continue to complement the information in the supporting text about the role of Landscape and Visual Impact Assessments as a recognised tool to ensure that all possible effects of change and development both on the landscape itself and on views and visual amenity are considered in decision-making.

- 7.54 I have carefully considered the comments about the proposed Important Views 5, 6, 7, 9a and 9b and looked at them during the visit. On the balance of the evidence, I am satisfied that they have been appropriately identified through the work undertaken on the Landscape Appraisal. I also note that no equivalent information has been assembled by the organisations which have objected to the identification of the views concerned.
- 7.55 With the incorporation of the recommended modifications, I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

**Replace the second sentence of the policy with: ‘The scale, nature, layout, and height of development proposals should respond positively to the key landscape and built development features of any affected Important Views as identified in the Landscape Appraisal.’**

*Include a note at the end of section 2.3 in the Design Guidance and Codes as follows: ‘The views in this document have been prepared based on local knowledge and information. There are overlaps between the identified views and those included in the Landscape Appraisal (Lucy Batchelor-Wylam, November 2023). However, for clarity, the identification of Important Views in the Plan (Policy WFD4) is based on the details in the submitted Landscape Appraisal.’*

#### Policy WFD 5 – Protection of Trees, Hedgerows, and other Natural Features

- 7.56 This is a comprehensive and well-considered policy on natural habitats. It addresses the following matters:
- the protection of identified wildlife networks;
  - mitigation measures;
  - examples of opportunities for the local delivery of biodiversity net gain; and
  - the creation of new access points.
- 7.57 As part of the preparation of the Plan, the Suffolk Wildlife Trust was commissioned to prepare a Landscape and Biodiversity Evaluation of the parish. Existing ecological networks are identified in the report and on Map 8 of the Plan.

7.58 Paragraph 6.22 of the Plan comments about the recent implementation of the Environment Act in relation to biodiversity net gain.

7.59 The policy has attracted a series of comments as follows:

Ipswich School - is generally supportive of the objective of policy WFD 5, and agrees that it is important that trees, hedgerows, and other natural features are protected. However, we question how the policy works alongside national policy and requirements. Specifically, it is the mention of measurable biodiversity net gain, and how it will be delivered, that we are concerned about.

Ipswich Borough Council - The Landscape Appraisal (2023) recommends that any new development replicates the well vegetated edge character of the village. This could be incorporated into the relevant policy. This addition would help enhance the character of the village and gives clearer advice to developers on how to do so.

Anglian Water - supports this policy for prioritising the delivery of biodiversity net gains within the neighbourhood planning area, to support habitat recovery and enhancements within existing and new areas of green and blue infrastructure

ESC – makes a series of detailed comments.

7.60 I have considered the policy and the comments very carefully. In general terms I am satisfied that the approach taken has regard to Section 15 of the NPPF. I am also satisfied that the policy brings an element of added local value to the national approach taken in the Environment Act on biodiversity net gain. The examples used in the third part of the policy provide useful advice for developers and landowners. Nevertheless, I recommend that the supporting text is modified so that this matter is clearer.

7.61 I also recommend that the opening element of the third part of the policy is recast to bring the clarity required by the NPPF. Its effect and purpose are unaffected. I have considered the various other comments received on the policy. In several cases they would add to its scope and purpose. However, their incorporation into the Plan is not required to ensure that it meets the basic conditions.

7.62 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

**Replace the opening element of the third part of the policy with: ‘Development proposals which otherwise comply with development plan policies will be supported where they provide a net gain in biodiversity through, for example:’**

**In the final part of the policy replace ‘shall’ with ‘should’**

*At the end of paragraph 6.22 add: ‘Policy WFD 5 does not seek to replicate this important aspect of national legislation and policy. However, the third part of the policy sets out examples of local measures to provide advice for developers and landowners on how to achieve biodiversity net gain.’*

## Policy WFD 6 - Design Considerations

- 7.63 This is an important policy on design. It advises that proposals for new development must reflect the local characteristics and circumstances in the Neighbourhood Plan Area as identified in the Westerfield Design Guidelines and Codes, and create and contribute to a high quality, safe and sustainable environment. It also comments that in addition to having regard to the National Model Design Code, all planning applications should demonstrate how they satisfy the requirements of the Development Design Checklist of the Design Guidelines and Codes, as appropriate to the proposal.
- 7.64 The policy also includes a detailed series of criteria/design principles which are intended to be applied in a proportionate way to development proposals.
- 7.65 ESC comments that:
- 'The National Model Design Code sets out the guidance for producing design codes, rather than being used to decide planning applications. It is suggested that the text just refers to the Neighbourhood Plan Design Code instead. Applicants need to go through a series of tests set out in the NPPF to determine whether the proposal is an acceptable use in the flood zone under Local Plan policy. This means that development within flood zones may be acceptable in certain circumstances, whereas the policy appears to take a blanket approach.'*
- 7.66 Ipswich School comments that it:
- 'Support(s) the need for proposals to reflect local character and support the creation of high quality, safe and sustainable environments. However, we are concerned that the policy repeats the requirements of the Local Plan and does not provide details of the local characteristics which are important to Westerfield. It is acknowledged that the policy references Design Guidelines and Codes but these are not subject to the same rigour, consultation and assessment as a Neighbourhood Plan or a Local Plan and the policies within them. As such the policy is seeking to divert decision making to documents which are outside of the Neighbourhood Plan process, and this is inappropriate.'*
- 7.67 In general terms, the policy takes a positive approach to design. In addition, its approach is proportionate to the scale and nature of development proposals. It is underpinned by the excellent Design Guidelines and Codes and the associated Development Design Checklist. In the round it is an excellent local response to Section 12 of the NPPF. In coming to this conclusion, I have taken account of the comments made by Ipswich School. The preparation of Design Guidelines and Codes to underpin neighbourhood plan design policies is now common-place, and the process is supported by government funding. By their nature Design Guidelines provide local distinctiveness to neighbourhood plans and respond positively to paragraphs 131 and 132 of the NPPF.
- 7.68 I note ESC's commentary about flooding issues. Whilst they are an important element of the planning system, and are addressed extensively in national and local planning policies they are not specifically design related. As such, I recommend that the first



element of criterion e. is deleted. I also recommend the deletion of criterion g. (on broadband) as the matter is now addressed nationally in the Building Regulations

- 7.69 Finally I recommend modifications to the wording used in the policy both to bring the clarity required by the NPPF and to recognise the role played by neighbourhood plans in the development management system. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

**In first part replace ‘must’ with ‘should’**

**Replace criterion e. with: ‘they do not result in water run-off, or add to or create surface water flooding, through the incorporation of above ground open Sustainable Drainage Systems (SUDS) that are multifunctional and provide amenity and biodiversity, in accordance with the Suffolk Flood Risk SuDS Local Design Guide 2023 and the Suffolk Coastal Local Plan Policy SCLP9.6 Sustainable Drainage Systems.’**

**Delete criterion g.**

**Policy WFD 7 – Artificial Lighting**

- 7.70 The policy looks to safeguard the dark skies environment of the parish. It comments that wherever practicable development proposals should respond positively to the dark sky environment of the parish and avoid the use of streetlights. It also comments that any future outdoor lighting systems should have a minimum impact on the environment by being downward focussed and motion sensitive, not extend past the property boundary, and minimise light pollution.
- 7.71 I am satisfied that the policy serves a clear purpose and has a non-prescriptive format. It acknowledges that the approach taken may not always be practicable. I note the comments made by ESC. However, the suggested changes are not required to ensure that the policy meets the basic conditions.
- 7.72 I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

**Policy WFD 8 – Parish Services and Facilities**

- 7.73 The policy acknowledges the importance of community facilities to the parish. It has two related parts. The first identifies seven facilities to which Policy SCLP8.1 and, as appropriate, Policy SCLP8.2 of the Local Plan would apply. The second is more general, and comments that proposals for the enhancement of the existing services and facilities will generally be supported subject to there being no unacceptable impact on the natural and historic environment, infrastructure, and the amenity of residents.
- 7.74 In general terms the policy takes a very positive approach towards the delivery of new community facilities and the retention of the seven identified existing facilities. I am satisfied that the policy has regard to Section 8 of the NPPF.

- 7.75 ESC questions the identification of the railway station as a community facility. On the balance of the evidence, I am satisfied that it has appropriately been included in the policy. It serves as an important social facility for the community to secure sustainable transport. In addition, I saw first-hand the various community and environmental initiatives which were taking place at the station during the visit. I am also satisfied that the other six community facilities are appropriate to be included in the policy.
- 7.76 I recommend that the wording of second part of the policy is modified so that it takes a positive approach towards the way in which any such facilities would be incorporated into the parish. The intent of the policy remains unchanged.
- 7.77 Finally, I recommend that the order of the two parts of the policy is reversed so that it has a positive approach. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and environmental dimensions of sustainable development.

**Replace the second part of the policy with: ‘Proposals for the enhancement of the existing services and facilities will be supported where they respond positively to the natural and historic environment, the infrastructure of the parish and the amenity of residents in the immediate locality of the facility concerned.’**

**Reverse the order of the two elements of the policy.**

Policy WFD 9 – Public Rights of Way

- 7.78 The policy comments that development proposals which improve and extend the existing network of public rights of way will be supported. It also advises that as appropriate to their scale, nature and location, development proposals should take account of the existing value of the right of way concerned as a biodiversity corridor and where practicable incorporate measures to enhance biodiversity as part of the proposal.
- 7.79 The Plan also advises that the policy needs to be read within the wider context set by the development plan and that it does not offer opportunities for development which would otherwise enhance footpath links to come forward where such a proposal would conflict with the provisions of the Suffolk Coastal Local Plan and other policies in this Plan.
- 7.80 I am satisfied that the policy takes a positive approach to this matter. It adopts a proportionate approach and acknowledges that its intentions may not always be practicable. I am satisfied that the policy has regard to Sections 8 and 9 of the NPPF and meets the basic conditions. In reaching this conclusion I have considered the representation made by Ipswich School about land to the west of Westerfield Road. However, as WPC comments, the Plan is not required to allocate additional sites for housing development, and no such proposal is included in the Plan.
- 7.81 The policy will contribute to the delivery of the social and environmental dimensions of sustainable development.

### Community Actions

- 7.82 The Plan includes a series of Community Actions. They have arisen naturally as the Plan was prepared. I am satisfied that they are both appropriate and locally-distinctive.
- 7.83 The Actions are incorporated in the main part of the Plan (with the land use policies) rather than being set out in a separate part of the Plan in accordance with national policy. However, on balance, I am satisfied that the approach in the Plan is appropriate. I have reached this view for three related reasons. The first is that they add value to the land use policies on a topic-by-topic basis. The second is that they are distinguished from the land use policies using colour. The third is that the Plan properly comments about their distinction from the policies in paragraph 1.3 of the Plan.
- 7.84 The following Actions are particularly noteworthy:
- Community Initiatives (CA1);
  - Broadband Speed (CA3);
  - Community Activity (CA6);
  - Speeding and Traffic Calming (CA8); and
  - Westerfield Railway Station (CA9)

### Other Matters - General

- 7.85 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for ESC and WPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

### Other Matters – Specific

- 7.86 ESC has made a series of helpful comments on the Plan. I have addressed them on a policy-by-policy basis where they are required to ensure that the Plan meets the basic conditions.
- 7.87 ESC suggest a series of revisions and additions to the general elements of the Plan. I have considered the various issues very carefully together with WPC's responses to the suggestions. To bring the clarity required by the NPPF, I recommend that the Plan is modified to address the following map related points as raised by ESC:
- *Renumber Maps 4 and 5;*
  - *Map 6 (LGS boundaries);*
  - *Map 8 (to show only the network in the parish); and*
  - *Map 9 (details of boundaries).*

## 8 Summary and Conclusions

### *Summary*

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2036. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area.
- 8.2 Following the independent examination of the Plan, I have concluded that the Westerfield Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

### *Conclusion*

- 8.3 On the basis of the findings in this report, I recommend to East Suffolk Council that, subject to the incorporation of the modifications set out in this report, the Westerfield Neighbourhood Development Plan should proceed to referendum.

### *Other Matters*

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose 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 East Suffolk Council on 27 September 2021.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses from the Parish Council to the clarification note were both detailed and informative and East Suffolk Council managed the overall process in a very efficient way.

**Andrew Ashcroft**  
**Independent Examiner**  
**17 February 2025**