



Thorndon Neighbourhood Plan

Draft Document Review

December 2018

1. Thorndon Neighbourhood Plan Committee has prepared an Initial Draft Neighbourhood Plan and a Neighbourhood Plan Matrix. A significant amount of good work and research has taken place to reach this stage and the Committee is to be commended on the thoroughness of the research. Following a review meeting with Mid Suffolk Planning Officers, the Committee has asked that these documents are reviewed in order to outline what additional work is required to get the Plan to a format ready for the Pre-Submission Consultation stage of the Plan preparation. This document provides the outcome of that review.

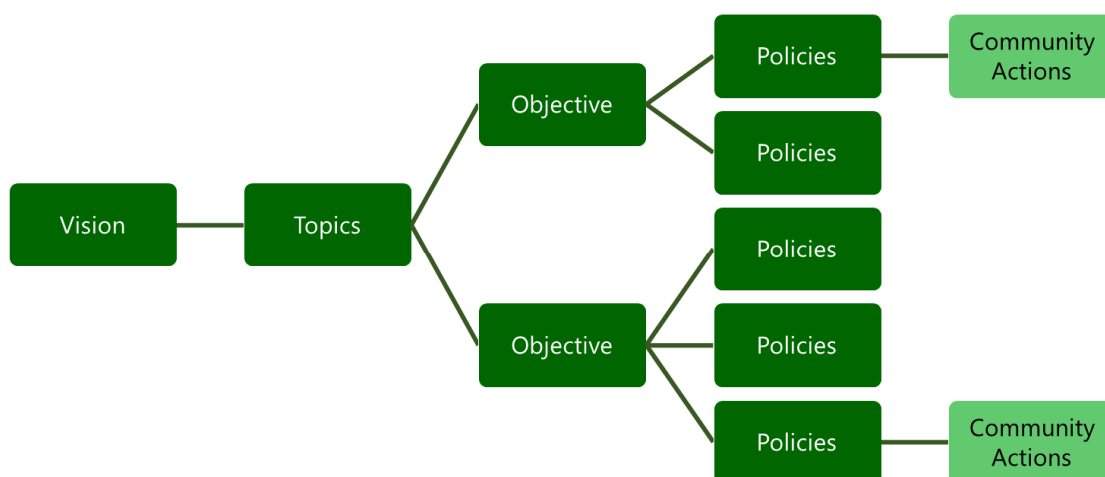
Neighbourhood Plan Document Requirements

2. Neighbourhood Plans are required to meet certain “Basic Conditions” against which they will be tested at the Examination stage. For Neighbourhood Plans, the basic conditions are:
 - having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
 - the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
 - the making of the order (or neighbourhood 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).
 - the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
 - prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).
3. The Neighbourhood Plan itself does not have to address all the Basic Conditions. Supporting documents, such as the Basic Conditions Statement and the Strategic Environmental Assessment / Habitats Regulations Assessment Screening Report, will cover these matters and help demonstrate to the Examiner that the Basic Conditions are met.
4. A Neighbourhood Plan should provide the end user (developers and the local authority Planners) a document against which decisions can be made. It should not contain every piece of evidence and information that’s been collected. This can be contained in separate “evidence” documents. Generally, a Neighbourhood Plan will:
 - Provide the background to why and how the Plan was prepared;
 - Provide a brief overview about the Plan area and the planning related issues that have been identified during its preparation;
 - Identify the planning policy context against which the Plan has been prepared;
 - Set out a Vision for the area and Objectives to deliver the Vision;
 - In topic specific chapters, set out the Planning Policies that will deliver the Vision and Objectives.
5. Government guidance on planning policies states:

“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when

determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”

6. Planning policies should, with a few exceptions, focus on matters that relate to “development” and which would normally require planning permission. However, the Plan cannot address matters that relate to the extraction of minerals (eg sand and gravel) or waste management.
7. Neighbourhood Plans can serve a useful purpose in identifying local projects that, although they fall outside planning control, can help address matters of local concern that have been identified during the evidence gathering stage of preparing the Plan. Often referred to as “Community Actions”, it is important that they are clearly identified as being separate from the planning policies. They will not have to meet the Basic Conditions tests.
8. A useful premise for the structure of a Neighbourhood Plan is to treat it as a “golden thread” whereby issues are identified, a vision and objectives are formulated, and planning policies and community actions are formulated to address, where appropriate, the issues. This can be illustrated as follows.



The Draft Plan

9. The Draft Neighbourhood Plan provided for review contains the following chapters:
 - Introduction
 - History of the village
 - Thorndon today
 - Environment
 - Parish Survey Introduction
 - Housing and Development
 - Demographics Analysis
 - Education
 - Health
 - Traffic and Highways
 - Public Services

- Rural Crime and Public Safety
- Policies for Thorndon’s Future

The chapters are preceded by a Foreword that contains much of the information that should also be included within the body of the Plan itself.

10. In general terms, the primary content of the Plan, at present, is factual information about the village and its environment, history and facilities. Given the extensive amount of information here, it would probably best be placed in a separate “evidence” document so that only the key points are included in the Plan to support the policies and proposals.
11. As noted above, in paragraph 4, there are normally particular matters that will be included in a Neighbourhood Plan and many of these are not currently present in the Draft Thorndon Plan. See the draft [Botesdale and Rickinghall Neighbourhood Plan](#) for an example of the content of a Plan. On this basis, it is suggested that the structure of the Plan would read better if it were set out as follows:

Proposed Document Structure

1. Introduction
Identifying the purpose and legal background to the Neighbourhood Plan and the background to the preparation of the Plan.
2. History of the Village
Much of this is already complete. It does not need to be detailed but helps the reader and user of the document to understand how the village has evolved over time.
3. Thorndon Today
Setting out the key issues that have been identified during the preparation of the Plan as well as the statutory designations that the Plan must have regard to, such as listed buildings. The information for this chapter appears to be largely in place in the current draft document. As noted above, this should be edited down to the key facts and the remaining supporting information published in a separate document.
4. Planning Policy Context
This will set out the framework against which the Plan has been prepared. At a local level this is currently the Core Strategy (2008) and Core Strategy Focused Review (2012). It is quite likely that the Neighbourhood Plan will be completed before the Joint Local Plan is adopted and therefore it will be examined against the Core Strategy documents, but the content should be minded to the content of the emerging Joint Local Plan.

5. Vision and Objectives

Vision:

‘Thorndon Parish will strive to celebrate its proud heritage whilst keeping the village a thriving rural community in a living, working countryside which is dependent on retaining our local services and community facilities such as schools, local shops, public houses and places of worship. Affordable and accessible rural housing is essential to ensure viable use of these local facilities. We will welcome appropriate housing development to ensure that our community continues to thrive’

Objectives:

To be determined? There is some content in the Matrix document that could evolve into Objectives. It is best to keep the number of Objectives to a minimum.

6. Planning Strategy

This will set out how growth in Thorndon is to be managed over the Plan period – ie growth will be commensurate with its status in the Local Plan / Core Strategy (Secondary Village) and will be focused within the Settlement Boundary in order to protect the countryside.

7. Housing Policies

MSDC may identify the housing requirement for the Neighbourhood Area in the forthcoming Local Plan. It is understood that it will be published for consultation in February 2019. In order that the Plan is robust, it should identify how the housing requirement for the Plan period will be delivered eg site allocations and infill. Research will be required to demonstrate past trends for what is known as “small-site windfall” housing developments. These are generally developments of under 10 homes within the Settlement Boundary or barn conversions. Such developments tend to continue to happen, albeit at a diminishing rate as opportunities are used up. Places4People will undertake this research.

The Plan should identify what approach has been used to identify the allocated sites. There must be evidence to demonstrate that sites are available, deliverable and achievable within the Plan period. The Locality / AECOM Site Assessment will help to demonstrate this.

Policies will also identify any specific housing requirements that are not covered in the Core Strategy or the National Planning Policy Framework eg: house sizes, Lifetime Homes standards, affordable housing on exception sites.

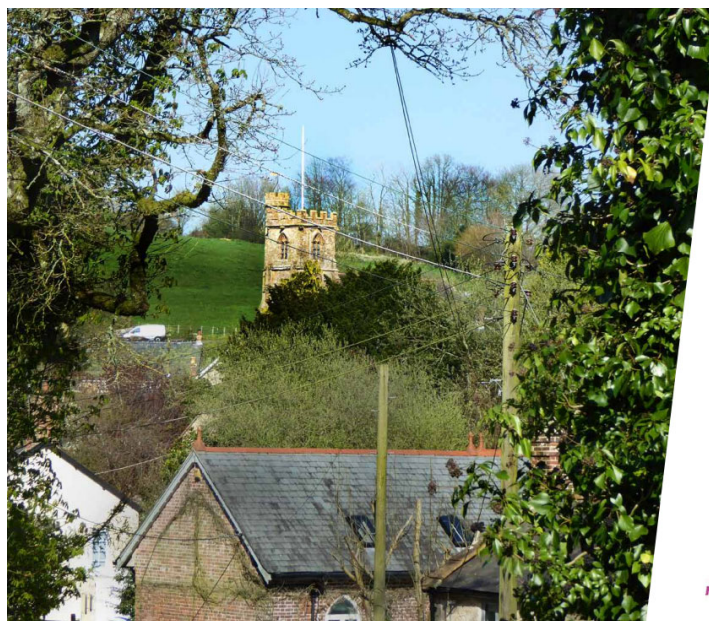
8. The Natural Environment

Objectives from Matrix

To maintain the rural nature of the current character of the village.

Protect natural environments for the benefit of biodiversity and human recreation and enjoyment.

In addition, there may be other local characteristics that should be taken into account when considering development proposals that could have an impact on the local character of the area. The Locality Technical Support package includes the preparation of “Design Codes” which would help set standards for new development and, if not already requested from Locality, should be considered.



General Design
Guidelines for

Broadwindsor
Drimpton
Seaborough
Kittwhistle

Draft report-December 2017

Prepared for Broadwindsor
Neighbourhood Plan Forum by

My Community  **AECOM**

10. Services and Facilities

It is noted that the Plan Matrix document refers to Education, Health, Traffic & Highways, Public Services and Rural Crime. In reality, there is little that planning policies can do to influence some of these matters. For example, decisions to provide and increase the capacity of health services are made by the Clinical Commissioning Group and the GP Practices on a commercial basis. There will, however, be an opportunity to include a number of “community actions” within this area to address local concerns.

Appendices

These should be kept to a minimum

Glossary

This will be produced by Places4People

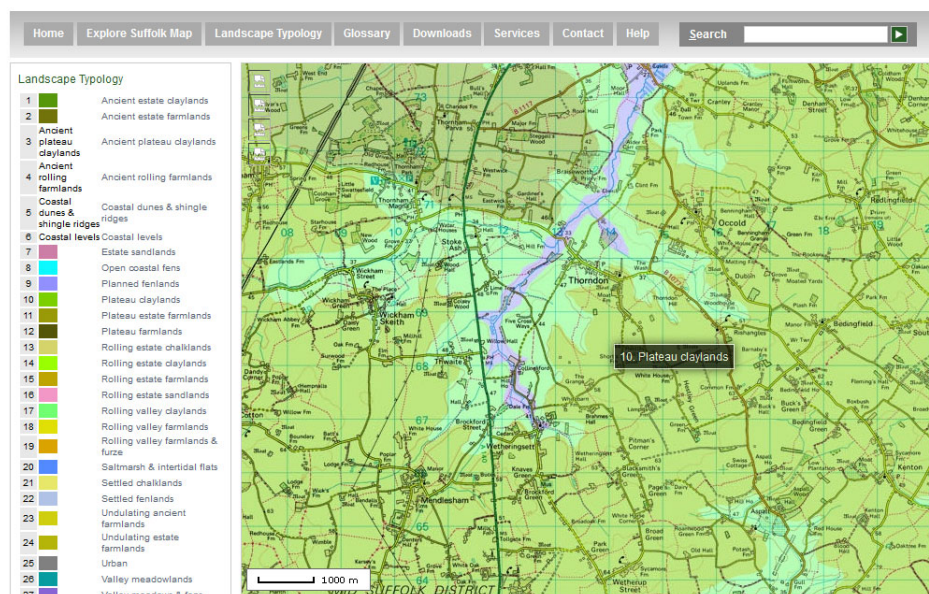
Plan Matrix document

12. We have reviewed the Plan Matrix document and, in particular the “Plan for the Future” column. The table at the end of this document provides comments on this content.

Moving Forward

13. Based on the content of the Initial Draft Plan, it is considered that the following areas of information gathering should be completed in order to inform its final content:

- i. **Housing Sites Assessment:** It is understood that this work has been commissioned from AECOM by Locality. We have not seen details of these sites but, once complete, the outcomes of this report can be matched against the housing requirement to identify which site or sites are the best options for allocation. It is strongly recommended that some informal consultation takes place at this time to seek consensus as to the preferred option for inclusion in the Plan.
- ii. **Village Character Assessment:** Our fee proposal included an option to assist the Committee to undertake a Village Character Assessment. It is recommended that this is undertaken in February, weather permitting, and that it should include:-
 - a. Assessment of potential Local Green Spaces – there are spaces identified in the Draft Plan that could meet the NPPF conditions for designation as a Local Green Space, such as Fen View Play Area and the Kerrison set-aside grassland. Local Green Space designation does not allow any development on them. The Sports Ground and Bowling Green would be identified as “Recreational Open Space” where different policies would apply, effectively allowing changing rooms or other associated buildings to be constructed if necessary.
 - b. The identification of any “non-listed” buildings that make a significant contribution to the character of the village or which have a special local importance. Such buildings could include the older part of the Primary School, which is not Listed. While it may not be possible to formally designate these buildings, the Plan can make useful reference to them requiring that development proposals to not have a detrimental impact on them or their setting.
 - c. Identification of the landscape character typologies that cover the Plan Area, as identified in the Suffolk Landscape Character Assessment and illustrated below, identifying the typical characteristics and guidance associated with those typologies. These will help to inform the design policies in the Plan.



- d. The identification of important views into, out of, and within the main built-up area of the village. This will help to reduce the impact of development on identified important views, which would be designated in the Plan.
 - iii. Design Code: If not already secured with Locality, The Neighbourhood Plan Committee should consider seeking the Design Code Technical Support Package from Locality. This will be particularly useful for informing the design parameters for any sites allocated in the Plan. The decision should be made as a matter of urgency as it can take AECOM (Locality's consultants) 8-10 weeks to complete this work.
14. Upon completion of the above, and in accordance with our Fee Proposal, we would propose holding a workshop with the Neighbourhood Plan Committee to finalise the content of the Plan and, in particular, the planning policies and community actions.
 15. In the interim, and with the Committee's approval, we would propose restructuring the current draft Plan to insert a new Introduction chapter, the Planning Policy Context chapter and the Planning Strategy Chapter as this is not generally reliant upon the completion of the matters identified above. This time would come from the 5½ days allowed for the preparation of the Neighbourhood Plan in the Fee Proposal. However, we feel that the extraction of the background data into a separate evidence document is more cost effective if undertaken by a Committee member.

Other matters

15. It is noted that there is little in the way of information about the Neighbourhood Plan on the Parish Council website. It is important that the Plan preparation process is transparent and that village residents are kept up to date with progress. It is therefore recommended that a separate Neighbourhood Plan tab is created on the website and that additional information and progress reports are made available.

Timetable

16. We have previously produced a Project Plan that proposed undertaking the formal "Pre-Submission" consultation on the Draft Plan in May 2019. We believe that this remains possible, even with the additional work identified in this report. It will, however, require AECOM to produce timely reports and this may require "encouragement" by the Committee.

Recommendation

- 1 Commission the Village Character Assessment, as detailed above.
- 2 Agree to the restructuring of the Draft Plan as detailed in para 14 above.
- 3 Consider requesting the Locality Design Code Technical Support package, if not already requested.
- 4 Produce a separate "Village Data" document by extracting most of the detailed data out of the current Draft Plan.

Places4People
December 2018

Plan Matrix – Comments on the “Plan for the Future” content

Matrix Content	This will be achieved by....
Environment	
To maintain the rural nature of the current character of the village.	Policies will be supported by the Character Assessment and, additionally, the Locality Design Code work. The “Spatial Strategy” policy of the Plan will restrict development outside the Settlement Boundary to that which is essential to be in the countryside or, for example, the conversion of farm buildings to residential.
Protect natural environments for the benefit of biodiversity and human recreation and enjoyment.	Policies to designate Local Green Space plus the restriction of development outside the Settlement Boundary
...recognising that for a settlement to thrive some growth and development has to take place in harmony with existing natural and manmade environments.	Design criteria policy plus the identification of particular important characteristics in the Character Assessment
Housing	
1. Whilst accepting the need to build more housing to support the housing requirements within the district, any developments should be sympathetic to the rural nature of the ‘Hinterland’ village, meld with the surrounding properties and, where possible, have minimal impact on the overall social balance of the community.	Design criteria policy.
2. A number of potential building plots have been identified which should deliver the necessary number of houses to support the development requirements for a Hinterland village to support the Babergh/Mid Suffolk Joint Local Plan. The land owners of these plots have been approached and have agreed to their land being used for future development.	Policy on delivery of housing requirement through Plan period. Site allocation policy for larger site or sites.
3. The size and mix of the houses should support the continued progress of the community as outlined in the above statement with housing providing the opportunity for young people to remain in the village.	Local needs affordable housing policy, Community Action – Establish Community Land Trust?

Demographics	
1. Forecasting potential demographic change is difficult. The 2011 census figures may not reflect current (2017) patterns in the village particularly in those age group sets where numbers are small.	At such a local level it is difficult to forecast population change, other than it is expected that an increasingly significant proportion of residents will be over 60 and retired.
2. The proportion of population aged 60+ is likely to continue to increase given the current age profile of population living in the village. Infrastructure needs will need to develop with growth in this age group.	Thorndon is unlikely to meet the size criteria for having specific housing for older people – eg sheltered housing schemes. Community Actions might be considered to help those less mobile?
3. Attracting growth in the independent 16-64 year old age group with a consequent likely increase in the dependent 0-15 year old age group will be required to maintain the existing age profile of the village population. This is likely to link to employment opportunities expanding in the immediate area.	This is likely to require family housing although over 60% of the 4 or more bedroomed homes in Thorndon are (in 2011) occupied by 2 or less people!
Education	
The school have already built on all available land meaning that there is little playground left and there is no available funding for expansion of the school to accommodate a greater number than 84 on roll.	The County Council will seek CIL (Community Infrastructure Levy) payments from eligible development towards expanding school places. There is currently over £95,000 in the Thorndon CIL “pot” for eligible infrastructure plus almost £18,000 available for eligible Parish Council projects.
There is currently a demand for places from outside the catchment area and this would need to be reconsidered in the future so that the school could cope with demand just from this village alone The most promising idea for expansion near the current school site would be the land beside the church, the area known as the Guildhall Pightle. This area is currently owned by the Thorndon Town Trust. Parking at the school is already very limited, with the expansion of the church car park this may elevate some of the issues with current traffic at peak periods.	It is not necessary for the Neighbourhood Plan to identify land for the expansion of the school. However, once the future growth figures are known it may be useful to ask the County Council what the implications of the growth might be on the school. We have contacts at the County Council and will be able to enquire.
Health	
In the village survey 80% of respondents rated the local services supporting general Health as average or better. Within their supporting commentary they voiced concerns as to the capacity and service currently available and furthermore their concern around the	Health service provision is a duty of the Clinical Care Commission and local GP practices. Generally they expand to deal with growth but this tends to be retrospective expansion.

service level which may be offered in future following continued development. Future Planned development of the village must be linked to health service provision.	
Traffic & Highways	
1. Due to the rural nature high rates of car ownership are likely to be maintained. Future development must ensure adequate off-road parking facilities	The adopted car parking standards will be used for new development unless there is good justification to increase the standards.
2. Rural bus services provision are currently under review. Possible changes to and withdrawals of service must be monitored to ensure residents, particularly the elderly, the young and the disadvantaged are not denied access to essential and non-essential services because of a lack of public transport.	Planning policies can't do anything about the provision of bus services. However, community actions might be appropriate to seek to improve services, perhaps by means other than the traditional bus service?
Many of the minor roads would be too narrow to add additional pavements as the village increases in size in the future. However, with further increase in traffic due to village expansion further pavements maybe required to ensure pedestrians can remain safe.	This will need to be balanced with the potential impact on the character and environment of the village.
VAS equipment should continue to be utilised and developed with information passed to appropriate authorities to ensure the safety of residents.	Community Action.
Public Services	
Ensure that future public and voluntary services are developed and enhanced by engaging with planning authorities as development takes place.	Not something that can really be influenced given the level of development that Thorndon is likely to accommodate.
Ensure that needs assessments have been undertaken.	Need to specify which public services are being referred to.
Rural Crime	
Encourage the maintenance of Neighbourhood watch over time.	Community Action
Liaison and engagement with Policing services via Parish Council links.	Community Action
Maintain the use of VAS in the village together with analysis and dissemination of data to encourage safer driving.	Community Action