

Freckenham Neighbourhood Plan 2023-2040

**PRE-SUBMISSION DRAFT PLAN
OCTOBER 2023**



FRECKENHAM PARISH COUNCIL

Neighbourhood planning in a nutshell

The Localism Act 2011 introduced new rights and powers to allow local communities to prepare neighbourhood plans, which establish general planning policies for the development and use of land in the neighbourhood. These Plans, when properly “made” become part of the legal planning framework for the designated area.

A neighbourhood plan is, therefore, a community-led planning framework for guiding the future development, regeneration and conservation of an area. It concentrates on the use and development of land and can contain planning policies, proposals for improving the area or providing new facilities, and the allocation of sites for specific kinds of development.

Parish councils are encouraged to produce their own neighbourhood plans, enabling local people to have a say as to how their neighbourhood grows and develops. In a designated neighbourhood area, which contains all or part of the administrative area of a parish council, that council is responsible for the preparation of the Plan. Neighbourhood plans cannot contradict the main government planning policies or the strategic policies in the Local Plan for the area. For example, they cannot propose less development than is planned for in the adopted Local Plan.

Before a neighbourhood plan can be brought into force it needs to complete the following stages:

1 “Pre-submission” consultation on draft Plan by Parish Council

This is the stage we’ve now reached. The plan has to be widely consulted on for a minimum of six weeks allowing residents, businesses, landowners and a range of government bodies and service providers to comment on the Draft Plan.

2 Submission of draft Plan to West Suffolk Council

All comments received at the “pre-submission” consultation will be considered and reviewed and any necessary amendments to the Plan will be made. The Plan, together with supporting documents, will then be submitted to West Suffolk Council.

3 “Submission” consultation on draft Plan by West Suffolk Council

A further period of public consultation lasting a minimum of six weeks.

4 Independent examination of draft Plan

Typically taking around two months to complete, depending upon the availability of the Examiner.

5 Parish Referendum

Run in the same way as a local election and organised by West Suffolk Council

6 Adoption by West Suffolk Council

Subject to the outcome of the Referendum and taking place as soon as possible afterwards.

Stages 4 - 6 are likely to take around 6-9 months to complete.

Prepared by Freckenham Parish Council

Supported by

PLACES4PEOPLE
PLANNING CONSULTANCY 

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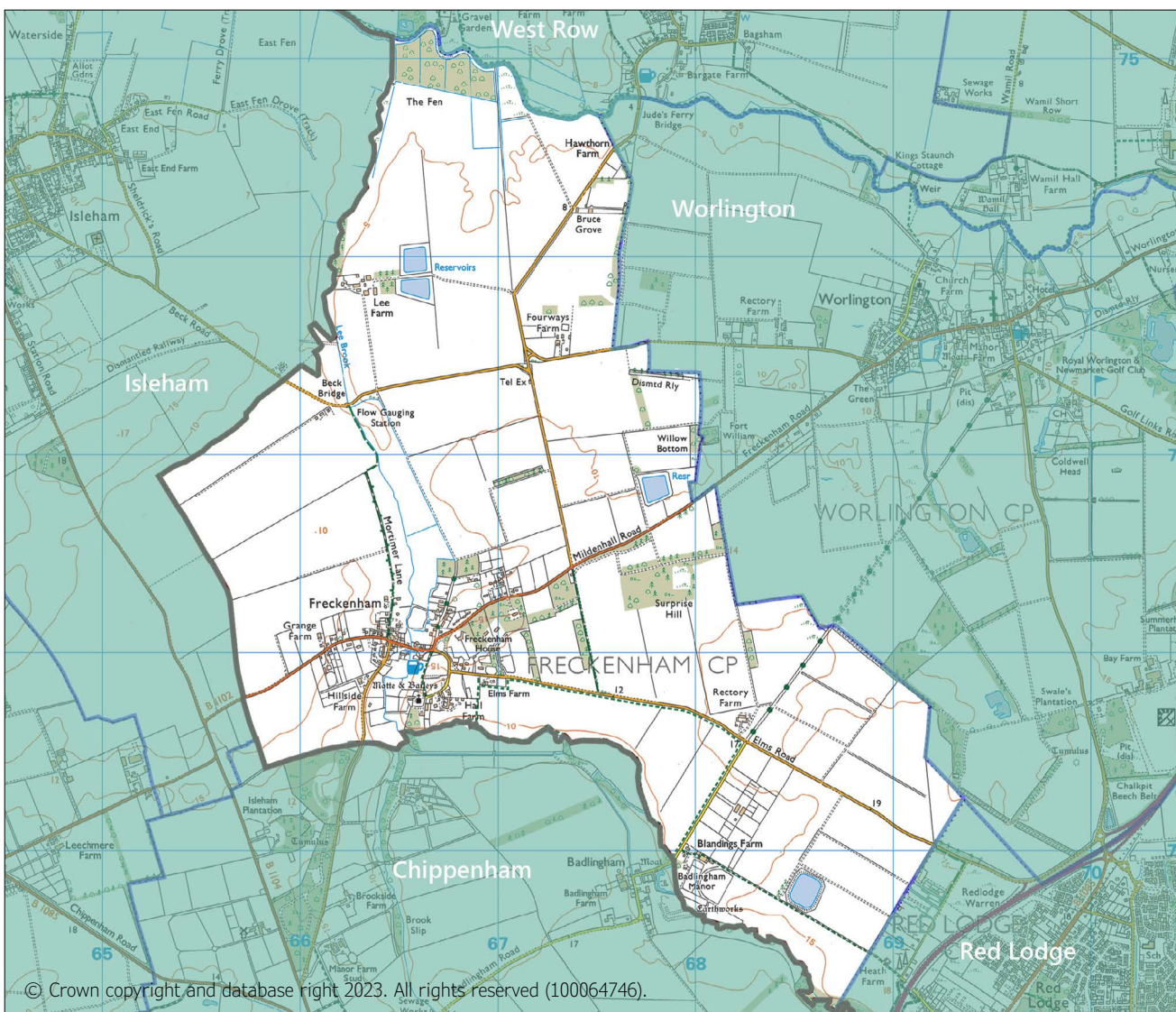
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1. Introduction

1.1 A Neighbourhood Plan is a community-led planning framework for guiding future development, regeneration and conservation of a designated area. It contains planning policies along with proposals for improving that area. When complete, the Plan will be used by West Suffolk Council and Government Planning Inspectors to inform planning application decisions. The Localism Act 2011 introduced rights and powers to allow local communities to prepare Neighbourhood Plans. In very simple terms, a neighbourhood plan is:

- A document that sets out planning policies for the neighbourhood area - planning policies are used to decide whether to decide planning applications.
- Written by the local community, the people who know and love the area, rather than the Local Planning Authority.
- A powerful tool to ensure the community gets the right types of development, in the right place, something that can establish general planning policies for the development and use of land in the neighbourhood.

1.2 In April 2018 Freckenham Parish Council made the decision to produce a Neighbourhood Plan and a small group of volunteers was subsequently formed. In November 2018 the whole parish was designated by West Suffolk Council as a Neighbourhood Area and in the same month Places4People Planning Consultancy were retained to guide and assist with the preparation of the Plan to be funded by the Government's Neighbourhood Plan Grant scheme. The area covered by the Neighbourhood Plan is illustrated in **Map 1**.



Map 1 -Freckenham Neighbourhood Plan Area

1.3 The Neighbourhood Plan will, when complete, form part of the statutory “development plan” for West Suffolk, meaning that its planning policies and content will be taken into account when decisions on planning applications are made.

1.4 The Neighbourhood Plan Regulations require a neighbourhood plan to:

- be appropriate, having regard to National Planning Policy;
- contribute to achieving sustainable development;
- be in general conformity with strategic policies in the development plan for the local area; and
- be compatible with EU obligations and Human Rights requirements.

1.5 The Neighbourhood Plan has been prepared in accordance with the requirements of the Government’s Neighbourhood Planning Regulations and, in particular, has involved local community engagement to gather evidence for the content of the Plan.

Residents’ Surveys

1.6 During Spring 2019, a Household Survey for the village was carried out and a total of 137 responses were received. The results of the survey are available to view on the Neighbourhood Plan pages of the Parish Council’s website. Further surveys were carried out in association with specific stages of Plan preparation, as referred to later in the Plan.

Drop-in events

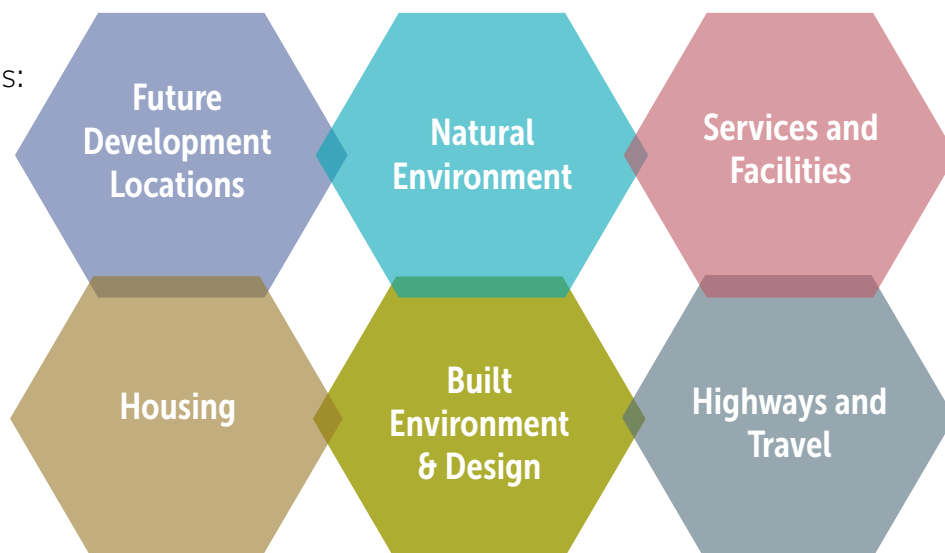
1.7 In March 2019 an initial information sharing drop-in event was held at the Village Hall. It provided an opportunity for residents to find out about neighbourhood planning and provide thoughts about Freckenham at present and in the future. The Covid 18 pandemic early in 2020 impacted on the opportunity to provide face-to-face feedback on the Household Survey, but a further drop-in event was held at the Village Hall in October 2020. It provided a chance to report on the progress of background reports, share the outcomes of a Landscape Appraisal and to consider potential sites for housing development. A further drop-in event was held in June 2022, primarily to consider the content of the Preferred Option consultation of the draft West Suffolk Local Plan.

Background Reports

1.8 In addition to the community involvement, specialist studies have been commissioned on Landscape and Design which are referred to in the body of the Plan and are also available to view on the Parish Council website.

Plan Themes

1.9 The Plan covers six main topic areas:



Vision and Objectives

- 1.10** The vision and objectives of the Neighbourhood Plan have been prepared taking into consideration the outcomes of the community engagement referred to earlier in this document, as well as the evidence collected from published data, surveys and assessments. They also take account of the need to prepare a neighbourhood plan that conforms with the strategic policies of the Local Plan. The Vision sets out the over-arching approach as to how development in Freckenham will be delivered through the Neighbourhood Plan in the period to 2040. This is refined through the Objectives established for each of the topic areas which, in turn, have guided the identification of the planning policies contained in the Plan. The planning policies do not repeat the policies in the Local Plan or the NPPF but supplement them by adding local detail or addressing locally specific matters.

Vision

In 2040 Freckenham will remain an attractive and friendly village where sustainable development both protects and enhances the natural and historic environment of the parish, services and facilities will meet the day to day needs of the community.



Objectives

Future Development Locations

1. Ensure that new development is located to protect the character of Freckenham and minimise impact on the countryside.

Housing

2. Ensure that Freckenham's housing growth is commensurate with the level of services and facilities in the village.
3. Deliver housing that is tailored to meet the needs of residents.

Natural Environment

4. Protect and enhance the landscape character of Freckenham including green spaces, woodland and watercourses.
5. Protect important views and links to the wider countryside.
6. Deliver net gains to the extent and quality of natural habitats and biodiversity.

Built Environment and Design

7. Conserve and enhance the village's heritage assets.
8. Ensure that new development is designed in a way that reflects local character.
9. Reduce the impact of new development through the incorporation of measures that reduce their environmental impact.

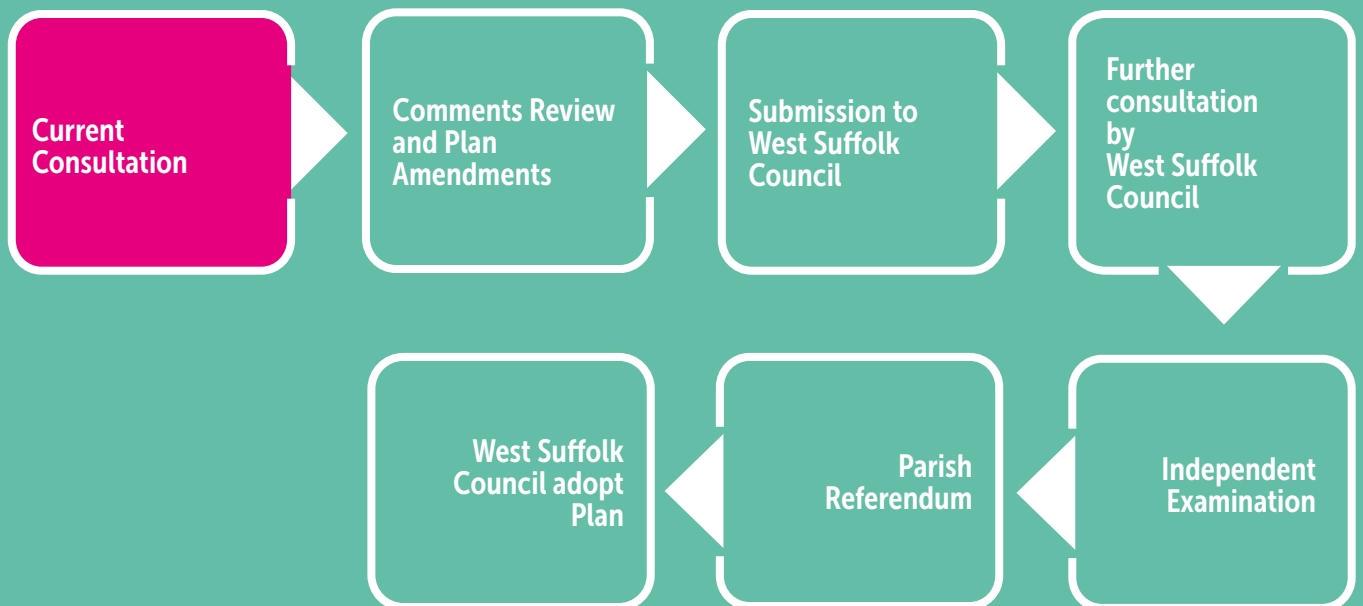
Services and Facilities

10. Minimise the impact of development on the capacity of essential infrastructure and services.
11. Protect and improve the range of existing community facilities and services.

Highways and Travel

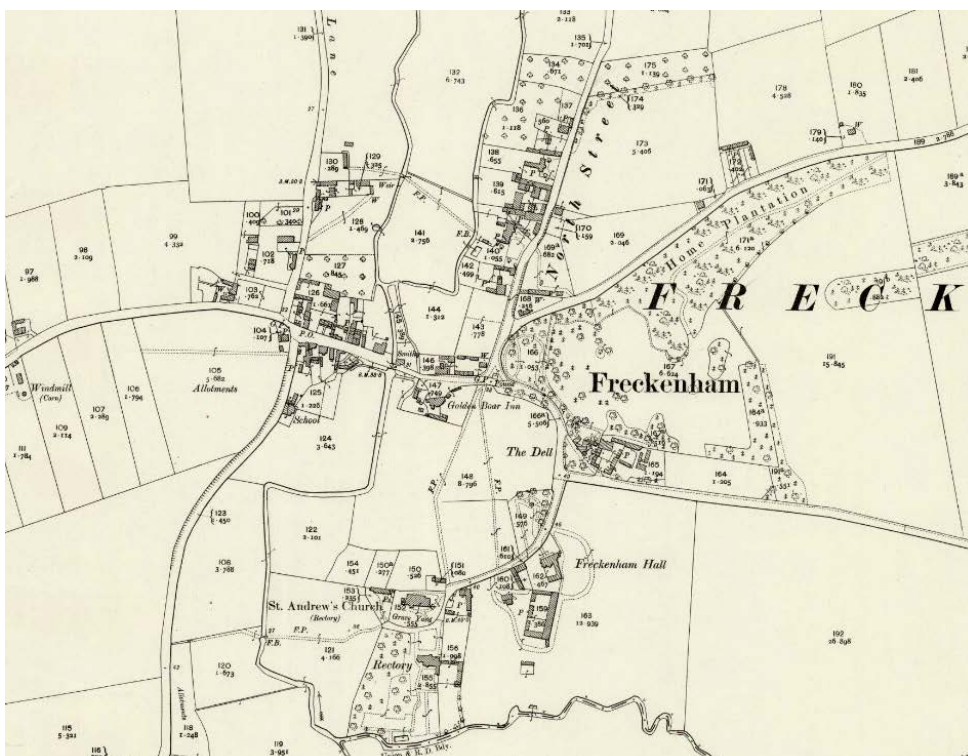
12. Protect, maintain and improve the Public Rights of Way network.
13. Ensure that new development minimises impact on the existing road network.
14. Ensure that existing pedestrian routes are maintained and enhanced to improve connectivity in the village.
15. Maintain and improve public transport.

- 1.11** These objectives form the basis for the content of the Plan and the distinct chapters cover the policies and aspirations for each topic. Each chapter contains a reminder of the relevant objectives, links to the relevant planning policy context and a summary of the relevant evidence collected during the preparation of the Plan, culminating in planning policies and, where appropriate, community aspirations.
- 1.12** The planning policies will supplement, rather than repeat, the planning policies in the West Suffolk Local Plan that were in place in March 2023. These policies are distinctly identified in coloured boxes with a prefix of FRE. In addition to planning policies, the Neighbourhood Plan contains “community aspirations” that, although they do not form part of the development plan, identify local initiatives that address issues and concerns raised during community engagement. The community aspirations are identified differently from the planning policies to avoid confusion.
- 1.13** This is the “Pre-Submission” draft Neighbourhood Plan and provides the first opportunity to comment on the complete draft Neighbourhood Plan. Once the consultation is complete, the Plan will pass through the remaining stages, as illustrated on the diagram below:



2. About Freckenham

- 2.1** As noted in the Conservation Area Appraisal published by the then Forest Heath District Council in 2010, Freckenham in Old English means the village of a man named 'Freca', who may have been Saxon, or one of a long line of agriculturists and hunters who found conditions viable on the dry land at the fen edge. There was a manor in Freckenham in 895, recorded as having been given by King Alfred to the Bishop of Rochester. It is assumed that this manor possessed a manor house and a church possibly on the site of St Andrew's Church.
- 2.2** The site of the village possessed strategic value, surrounded as it was on three sides by fen; in a commanding position adjacent to an old road junction covering the main east –west highway, and above the junction of two rivers and the river crossing. Its strategic value must have been recognised by the Norman conquerors who constructed a motte and bailey castle with a circular chalk mound some 12 metres high and a level summit 12 metres in circumference. The motte or mound stood in the north-east corner of an inner bailey or yard, with an outer bailey to north, a strong ditch dividing the two. The motte is now known as The Beacon Mound.
- 2.3** After the middle of the 16th century, in response to rising incomes from craft and trade there was a substantial rebuilding and enhancement of houses and farmsteads. This is born out in Freckenham where there is little evidence for the survival of houses built before this time and examples of 'listed buildings', i.e. The Golden Boar, Street Farmhouse and The Old Rectory, whose descriptions identify them as having 16th century fabric within.
- 2.4** The village grew slowly and quietly between the 17th and 19th centuries from 47 households in 1674 to 256 inhabitants in 62 houses in 1801 and 320 persons in 76 houses in 1901. There were two smock mills in Freckenham in the 19th century, one opposite Grange Farm on Fordham Road, and the other on the county boundary on the west side of Chippenham Road. A National School was built in 1839 in Chippenham Road which by 1891 was attended by 50 children. An elementary school was built in 1901 for 70 children. The Village Hall and Reading Room was built in The Street in 1894. The village pound, where straying livestock were impounded until claimed, was at the junction of The Street and Mildenhall Road.



Map 2 - Freckenham 1902

Freckenham Present

2.5 Today, Freckenham has a population of 363 (2021 Census), a negligible decrease of 2 people in the 20 years since the 2001 Census. Compared with 2001, the structure of the population has changed significantly over the last 20 years with nearly half the number of children aged under 15 and twice as many residents aged 75 and over, as illustrated in Figure 1.

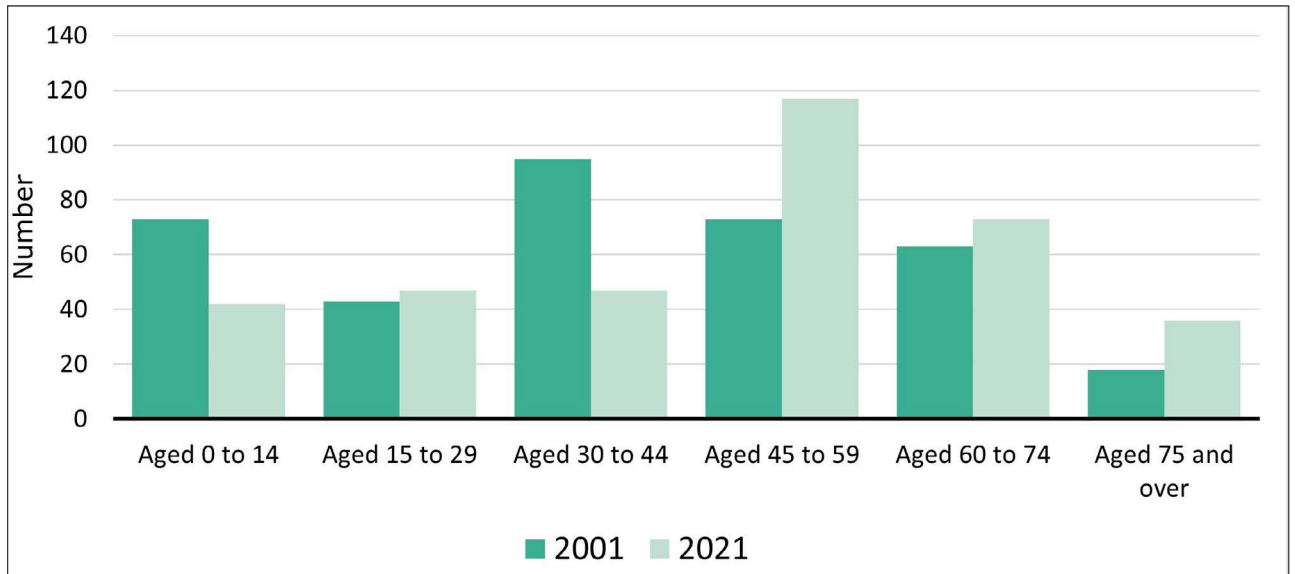


Figure 1 - Age comparison 2001 to 2021

2.6 In terms of facilities and services, Freckenham like many villages has changed considerably over the years, currently having a Parish Church, modern Village Hall, Recreation Ground with play area, Allotments and the Golden Boar public house. Unfortunately, the village no longer has a post office or primary school.



3. Planning Policy Context

- 3.1** The Neighbourhood Plan has been prepared in the context of the content of the National Planning Policy Framework (NPPF) and the relevant Local Plan documents that cover the parish. The Plan must have regard to the content of the NPPF and be in general conformity with the strategic policies of the adopted Local Plan. The paragraphs below identify how these are relevant to the Neighbourhood Plan.

National Planning Policy Framework

- 3.2** The National Planning Policy Framework (NPPF) sets out the Government's high-level planning policies that must be taken into account in the preparation of development plan documents and when deciding planning applications. In July 2021 the Government published a Revised NPPF. The Framework sets out a presumption in favour of sustainable development. Paragraph 11 of the NPPF states:

Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

- 3.3** The NPPF requires that communities preparing Neighbourhood Plans should:
Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; and
Plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.

- 3.4** Towards the end of December 2022 the Government published proposed changes to the NPPF for consultation, as well as a proposal to establish National Development Management Policies which would provide a standard approach to considering proposals relating to, for example, heritage assets. Minor amendments to the NPPF were published in September 2023 and the Plan will be brought up-to-date should the new NPPF be published before it is completed.



The Local Plan

3.5 The following diagram shows the components of West Suffolk Council's Local Plan in place in October 2023 which are relevant to the Neighbourhood Plan.



3.6 The 2010 **Forest Heath Core Strategy** identified Freckenham as a “Secondary Village” in the district’s Settlement Hierarchy, where such settlements would only “accommodate a very limited amount of new minor development.” The Core Strategy set out how the housing requirements for the district to 2031 would be delivered.

3.7 The **Joint Development Management Policies Local Plan** document (February 2015) contains a comprehensive suite of detailed planning policies by which planning applications across West Suffolk will be determined on a day-to-day basis. The neighbourhood plan does not repeat these policies but, where appropriate, adds value and detail to them from a local perspective.

3.8 In 2019 a **Single Issue Review of Core Strategy Policy CS7** was adopted. The review addressed the overall housing provision and its distribution across the former Forest Heath district. It did not impact on Freckenham’s position in the local plan settlement hierarchy or make provision for the type of development proposed for Secondary Villages.

3.9 Also in 2019 the Forest Heath **Site Allocations Local Plan** document was adopted. It identified the housing and employment allocations required to deliver the overall housing requirement identified in the Core Strategy. In accordance with the Core Strategy Settlement Hierarchy, the document did not allocate any sites in Freckenham.

Emerging West Suffolk Local Plan

3.10 West Suffolk Council has commenced work on the preparation of a new Local Plan for the area. The Plan will cover the period to 2040 although the Local Development Scheme (January 2023) suggests that the new Local Plan will not be adopted until Winter 2024, after the expected time of adoption of the Neighbourhood Plan. In May 2022 the Council consulted on the Preferred Options Local Plan document and consultation on the draft Local Plan is expected to commence in January 2024.

3.11 The Preferred Options document identified Freckenham as a “Type-A village” within the proposed settlement hierarchy, a category which is identified as having “more limited range of services and facilities than local service centres but can still meet some of the day to day needs of their residents. Some villages have opportunities for sustainable access to higher order settlements. The opportunity for site allocations will be explored through the local plan.” It also identified a preferred site for housing development at Grange Farm on Fordham Road for ten dwellings, but this site was later withdrawn by the owners in response to the Local Plan consultation.

3.12 At the time, the Parish Council raised objections to the classification of the village, given the lack of services available (see paragraph 2.6), and to the site proposed for development. The **Neighbourhood Plan does not have the power to change the category, which will need to be pursued through the planned consultation on the draft Local Plan at the beginning of 2024.**

3.13 Given that the draft West Suffolk Local Plan had yet to be published when the draft Neighbourhood Plan was prepared, regard has been had to the Preferred Options document while recognising that it might be subject to change as the Local Plan proceeds towards adoption in 2025.

Suffolk County Council Minerals and Waste Local Plan

3.14 In July 2020, Suffolk County Council adopted the Minerals and Waste Local Plan. It recognises that an existing sand and gravel quarry exists at Bay Farm in Worlington, of which a small area extends into the south-east corner of Freckenham parish. Most of the parish is also defined as a “Minerals Consultation Area” within which proposals in excess of five hectares will be referred to the County Council in order that they can be satisfied that, in accordance with paragraph 143 of the NPPF, minerals resources of local and national importance are not needlessly sterilised by non-mineral development.



4. Future Development Locations

Objectives

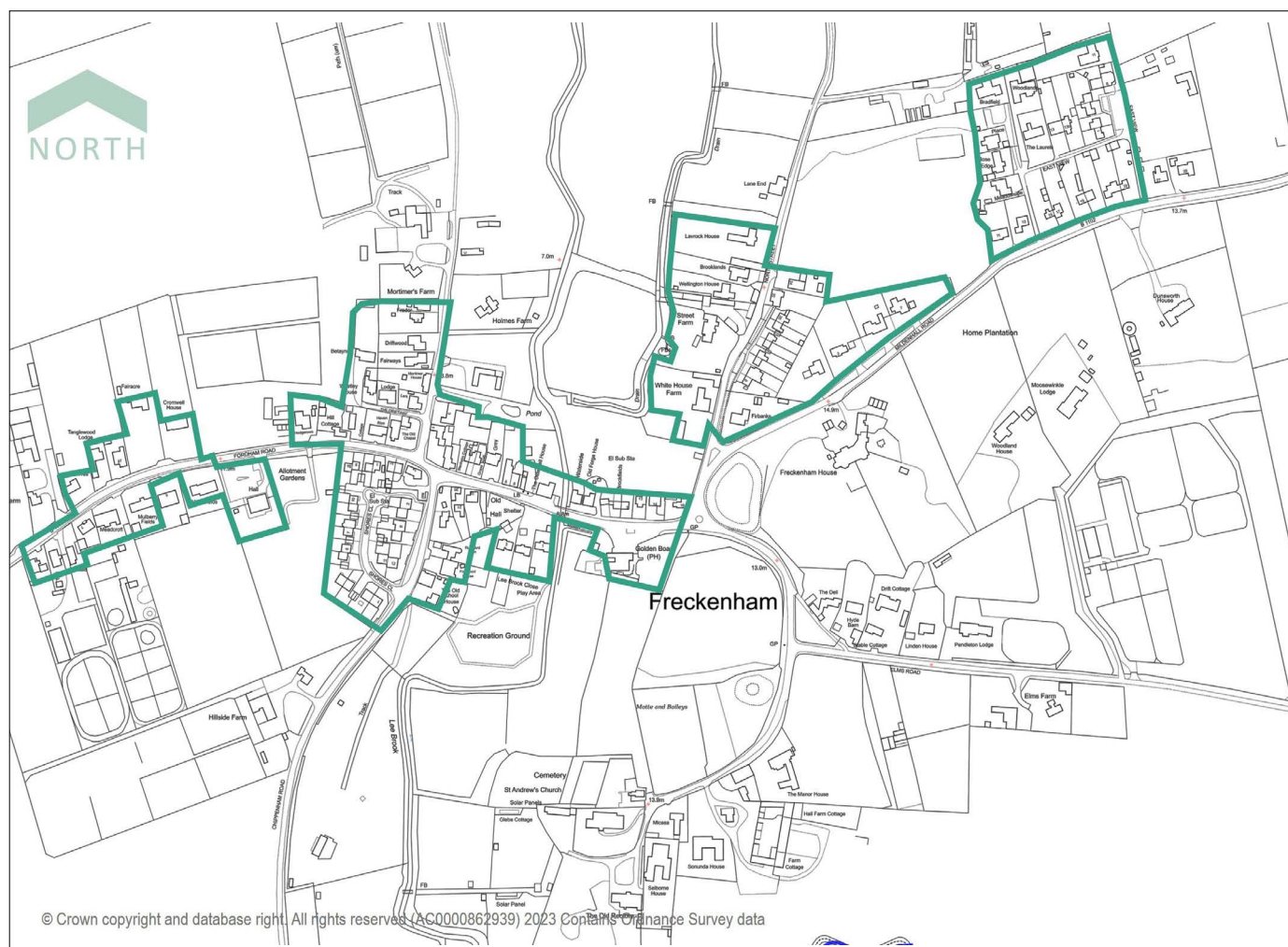
1. Ensure that new development is located to protect the character of Freckenham and minimise impact on the countryside

Context

- 4.1 As noted earlier, the Preferred Options consultation on emerging West Suffolk Local Plan (May 2022) proposes that Freckenham is designated as a Type-A settlement and identified a site for ten dwellings on the edge of the village. However, at the time of preparing the Neighbourhood Plan, the process to confirm the designation and any site allocated for development still had a number of stages to complete.
- 4.2 The location of new development could, without an element of control, have a significant detrimental impact on the character of the village and the countryside that surrounds it.

Current Planning Policies

- 4.3 The Forest Heath Core Strategy defines Settlement Boundaries around the built-up areas of the village, recognising that there are distinctly separate areas as illustrated on **Map 3**.



Map 3 - Adopted Local Plan Settlement Boundaries

4.4 Policy SA1: Settlement Boundaries in the Site Allocations Local Plan document for the former Forest Heath area states that “Planning permission for new residential development, residential conversion schemes, and replacement of an existing dwelling with a new dwelling(s) will be permitted within Housing Settlement Boundaries where it is not contrary to other planning policies.” The Preferred Options West Suffolk Local Plan (2022) confirms that the designation of “Housing Settlement Boundaries” will be continued in the Local Plan, identifying where the main residential land uses are to be concentrated and excluding non-residential uses such as existing employment. It also notes that a full review of the housing settlement boundaries will be undertaken ahead of the publication of the submission draft Local Plan, which is planned for January 2024. However, it is expected that the current adopted policy stance of a presumption in favour of new residential development within the Housing Settlement Boundaries will be carried forward.

4.5 Outside the Housing Settlement Boundaries, the Core Strategy limits development to particular types of development that support the rural economy, meet affordable housing needs, or provide renewable energy subject to all other material considerations and policies. This approach is expected to continue in the West Suffolk Local Plan, with the Preferred Options consultation stating that support would be given to proposals for:

- agriculture, horticulture or forestry;
- affordable housing to meet a proven local need;
- equine related activities;
- small scale facilities for outdoor sport and recreation, leisure and tourism;
- agriculture, forestry or equine business key worker where an essential need is proven;
- the replacement of an existing dwelling on a one for one basis of a similar scale and floor area and small scale residential development in accordance with other policies on housing in the countryside.

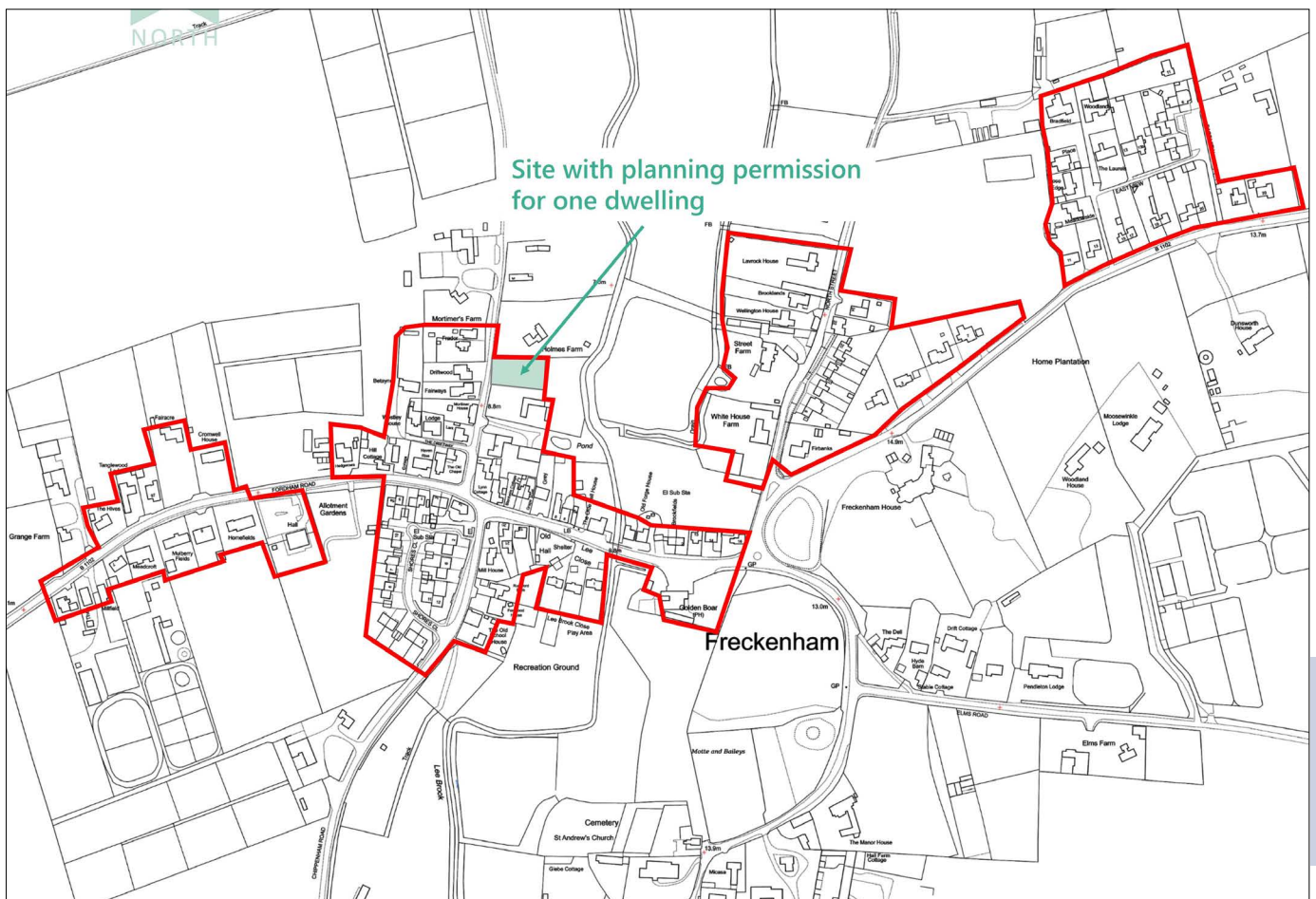


Residents' Survey

- 4.6 The main concerns about any future development in the village expressed by residents in the 2019 survey were:
- i. increased traffic
 - ii. loss of green spaces/countryside; and
 - iii. loss of village identity

Neighbourhood Plan Policy

- 4.7 The Housing Settlement Boundary in the adopted and emerging Local Plans has been reviewed as part of the preparation of the Neighbourhood Plan and amended to bring it up-to-date, as illustrated on **Map 4**. There are other areas of homes in the village centre, such as between Mildenhall Road and Elms Road and off Church Lane. These have never been included within the Local Plan Housing Settlement Boundary and the Neighbourhood Plan does not propose their inclusion due to the very low density of development and implications of a presumption in favour of development in these areas could have on the character of the areas concerned. In accordance with the adopted and emerging planning policies for Freckenham, new development will be focused within the Housing Settlement Boundary. This approach will ensure that the largely undeveloped countryside in the remainder of the Neighbourhood Area will remain preserved and the distinct settlement form is maintained. **The definition of the Housing Settlement Boundary in the Neighbourhood Plan cannot preclude future local plan documents reviewing the Boundary and amending it to reflect housing allocations.**



Map 4 - Neighbourhood Plan Housing Settlement Boundaries

- 4.8** Within the Housing Settlement Boundary there will remain a presumption in favour of sustainable development, but it is essential that any proposals have regard, as appropriate, to:
- the presence of heritage and natural assets;
 - the landscape setting of the village;
 - the capacity of services and infrastructure; and
 - the impact of development on designated habitats in the wider area.
- 4.9** Outside the Housing Settlement Boundary, there may be situations where it can be adequately demonstrated that it is necessary for development to take place. However, and in accordance with the emerging Local Plan, this will be limited to that which is essential for the operation of agriculture, horticulture, forestry, outdoor recreation and other uses that need to be located in the countryside. However, this approach does not restrict the conversion of agricultural buildings to residential uses where proposals meet the government regulations and local planning policies for such conversions. There may also be occasions where the expansion of an existing business use will be supported where it can be demonstrated that such a proposal would not have a detrimental impact on the landscape and the infrastructure required to support it.

Policy FRE 1 - Spatial Strategy

In the period 2023 to 2040 the Neighbourhood Plan area will accommodate development commensurate with the parish's designation in the adopted Local Plan settlement hierarchy. New development will be focused within the defined Housing Settlement Boundaries, as identified on the Policies Map, where proposals for housing development on infill plots or for small groups on redeveloped plots will be supported where they do not have a detrimental impact on residential amenity, the natural and historic environment, infrastructure and highways.

Outside of the Settlement Boundaries, priority will be given to protecting and enhancing the countryside from inappropriate development. Proposals will be supported in principle for:

- agriculture, horticulture or forestry development;
- affordable housing on a rural exception site that meets a proven local need;
- equine related activities;
- small scale facilities for outdoor sport and recreation, leisure and tourism;
- an agriculture, forestry or equine business key worker dwelling where an essential need is proven;
- the replacement of an existing dwelling on a one for one basis of a similar scale and floor area and small-scale residential development in accordance with other policies on housing in the countryside;

Proposals for new buildings outside the Housing Settlement Boundaries will be required to be accompanied by a Landscape and Visual Impact Assessment, or other appropriate and proportionate evidence, that demonstrates how the proposal can be accommodated in the countryside without having a detrimental impact, by reason of the building's scale, materials and location, on the character and appearance of the countryside and diminish gaps between settlements.

Sunnica Solar Energy Farm Proposal

- 4.10** During the time the Plan was being prepared a constant uncertainty for the parish has been the proposal to construct a solar energy farm across large tracts of the West Suffolk / East Cambridgeshire border including much of the Freckenham parish. The proposal is defined as a "Nationally Significant Infrastructure Project" and being dealt with by the Government's Planning Inspectorate. As such, with the hearings into the proposal being held during 2022 and 2023, the decision will be made outside the Neighbourhood Plan process and the Plan will have no influence on the decision.

5. Housing

Objectives

2. Ensure that Freckenham's housing growth is commensurate with the level of services and facilities in the village.
3. Deliver housing that is tailored to meet the needs of residents.

Context

- 5.1** The 2021 Census shows that there were 162 dwellings in Freckenham parish, an increase of three since the 2011 Census. In recent years there have been a limited number of new homes built across the parish and on 1 July 2023 planning permissions were in place for a further six new dwellings that had yet to be completed.
- 5.2** In terms of house sizes, other than a minority of one bedroomed homes, the parish has a fairly even mix of homes. However, when compared with the mix across West Suffolk, the parish has a much higher proportion of homes with four or more bedrooms (35.3 percent against West Suffolk's 22.4 percent). Almost 25 percent of homes only had one resident in 2021, up from 16% in 2001.

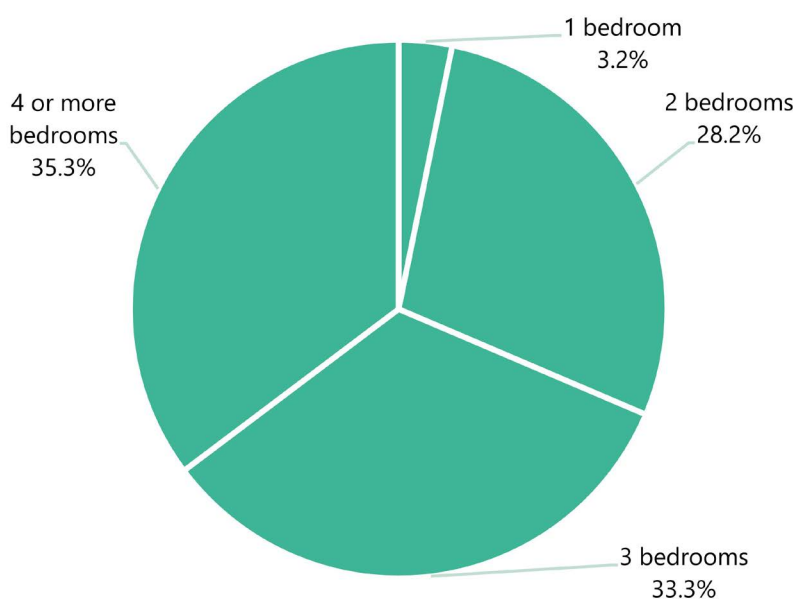


Figure 2 - Freckenham House Sizes (2021 Census)

- 5.3** Land Registry data indicates that there were nine dwellings sold in Freckenham in the year to 1 July 2023. Average prices paid were £505,000 for detached dwellings and £278,000 for semi-detached dwellings. There were two sales of flats/maisonettes which realised an average of £962,500, but these prices were somewhat skewed by the fact that they were large properties forming part of Freckenham House. The 2021 Census indicates that there are only four flats/maisonettes in the parish, all of these forming part of Freckenham House.
- 5.4** Affordability of homes is a key issue at the time of preparing the Neighbourhood Plan as mortgage interest rates rise. The most recent government data on house prices and earnings for West Suffolk (2022) indicates that the median (middle value) ratio is that prices are 8.9 times individual incomes, up from 7.1 in 2012.

Current Planning Policies

- 5.5** In September 2019 West Suffolk Council adopted a Single Issue Review of the Forest Heath Core Strategy. The Review focused solely on the planned housing growth and its distribution across Forest Heath. The Review did not make any provision for growth in Secondary villages in the period to 2031 other than windfall and infill plots allowed for in the 2010 Core Strategy and the 2015 Development Management Policies document.
- 5.6** Other policies of relevance to housing development in Freckenham can be found in the Joint Development Management Policies Document (2015) and are:
- Policy DM22: Residential Design
 - Policy DM24: Alterations or Extensions to Dwellings, including Self Contained Annexes and Development within the Curtilage
 - Policy DM25: Extensions to Domestic Gardens within the Countryside
 - Policy DM26: Agricultural and Essential Workers Dwellings
 - Policy DM28: Residential Use of Redundant Buildings in the Countryside
- 5.7** The May 2022 Preferred Options Local Plan consultation planned for a minimum indicative requirement of 7,134 new homes across West Suffolk between 2021 and 2040, of which 96 would be distributed across the 16 Type A villages. The same consultation proposed to allocate a site at Grange Farm, Fordham Road for ten dwellings. This matter, as it relates to the Neighbourhood Plan, is addressed below.

Residents' Survey

- 5.8** During the course of the preparation of the Neighbourhood Plan residents had an opportunity to have a say about the amount and location of new housing in the village. Firstly, in the 2019 Residents' Survey, of the 135 that responded to the question "Do you think Freckenham needs more houses?" 60 percent said "No". Those that answered "Yes", were asked to indicate how many new homes they thought the village needed, but there was no clear majority with 29 percent saying between six and ten homes and 22 percent saying between 16 and 20 homes.
- 5.9** As illustrated in Figure 3, there was strong support for small houses being built (one or two bedrooms) and little support for large homes with five or more bedrooms.

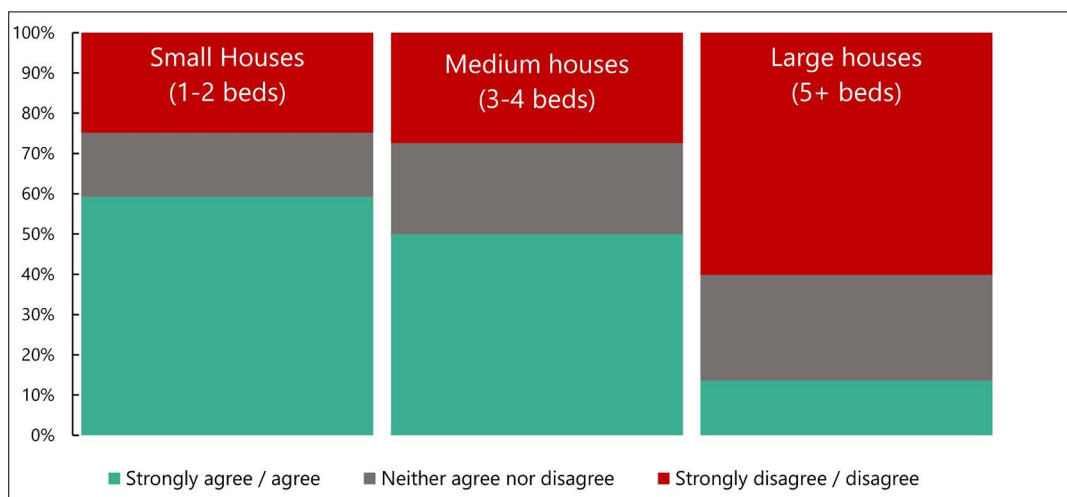


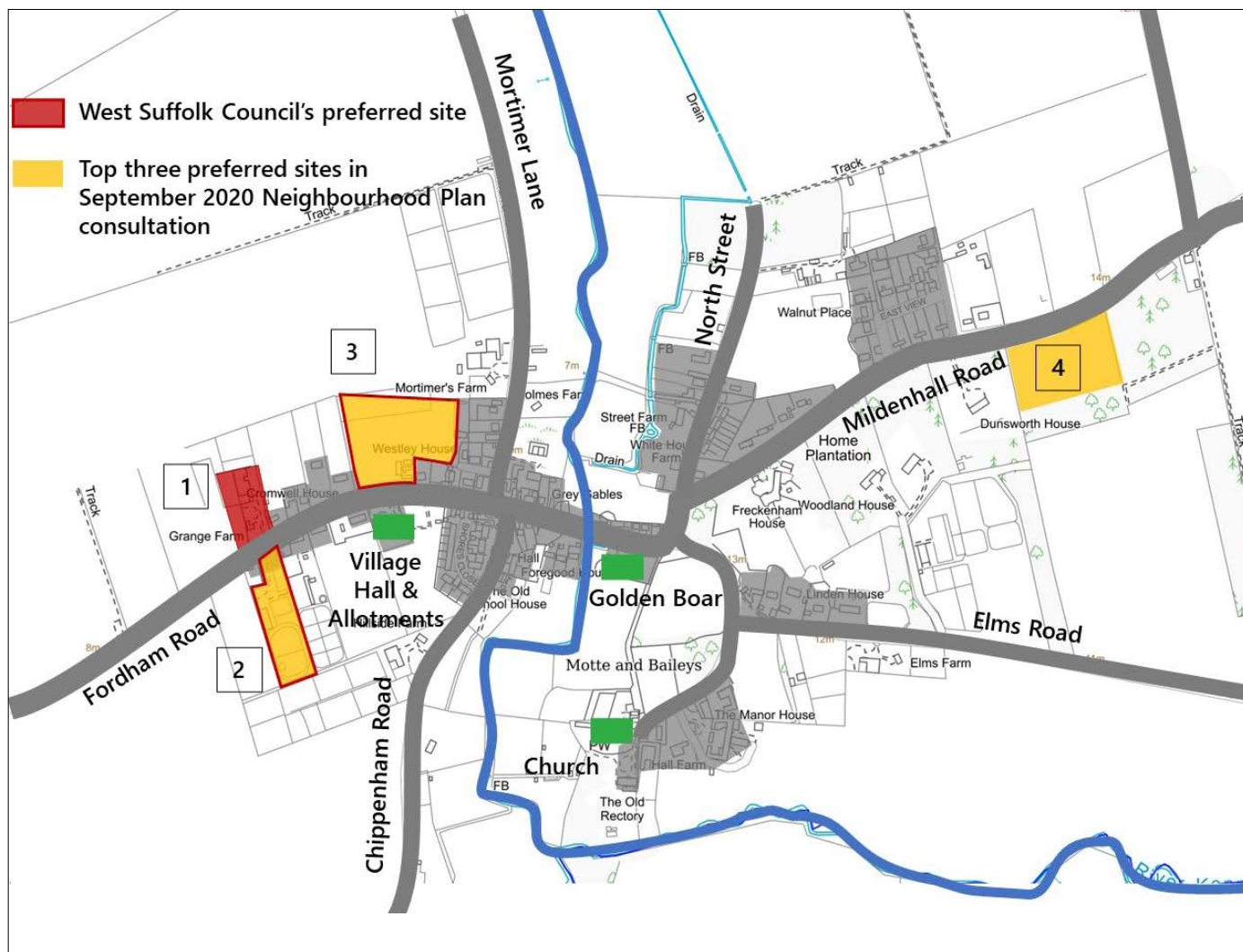
Figure 3 - Size of houses Freckenham needs (2019 Residents' Survey)

Neighbourhood Plan Policies

- 5.10** Early in the preparation of the Plan it was expected that West Suffolk Council would provide an indication of the future housing requirement for the village and that the Plan would allocate a site or sites for new housing.
- 5.11** As noted above, West Suffolk Council has indicated an intention to allocate a site for housing development in Freckenham in the new Local Plan. With this in mind, the Parish Council commissioned background work in the preparation of the Neighbourhood Plan to determine the availability of sites and their suitability for housing development.
- 5.12** During 2019 letters were sent to landowners across the parish asking if they had land that they would like to be considered for potential housing development in the Neighbourhood Plan. Fifteen potential sites were submitted. In addition, West Suffolk Council carried out a similar exercise in 2019 and published their results in February 2020. That exercise identified one additional potentially suitable site in the parish that hadn't already been submitted to the Parish Council.
- 5.13** As part of the Government support programme for neighbourhood plans, an independent assessment of the suitability of the sites was prepared. The report "Freckenham Neighbourhood Plan Site Appraisals" September 2020 is available to view on the Neighbourhood Plan pages of the Parish Council's website. The report categorised the sites as:
Green - no constraints or constraints that are easily overcome, so the site can be allocated;
Amber - sites which are potentially suitable for allocation if medium scale constraints can be overcome, or part of site only is suitable;
Red - not suitable due to national/local planning policy and/or technical constraints very difficult to overcome.

A map illustrating the sites and the conclusion of the Assessment is included as **Appendix 1** of this Plan.

- 5.14** The results of the Assessment were fed back to the community at a drop in event and follow up survey in September 2020 and the most popular sites for development were:
- i. the site at Meadcroft and Millfield, south of Fordham Road;
 - ii. the site opposite the Village Hall on Fordham Road; and
 - iii. land south of Mildenhall Road.
- 5.15** Further work to assess how these sites could be developed was carried out by consultants as part of the Neighbourhood Plan support programme. In the meantime, in May 2022, West Suffolk Council published the Preferred Options Local Plan consultation which identified a site at Grange Farm, Fordham Road for the construction of 10 dwellings.
- 5.16** Given the conflict between the Local Plan preferred site and those preferred by residents, the Parish Council organised a further consultation in July 2022 to gain residents' opinions on the Local Plan site compared to the three previously favoured sites. It was noted that the site at Meadcroft and Millfield was now smaller than previously considered due to part of the land being no longer available. The consultation sites are illustrated on **Map 5**. A survey conducted in conjunction with the Parish Council consultation asked people what they thought about the number of homes proposed for Freckenham by West Suffolk and to rank the four sites in order of preference.



Map 5

Map 5 - Sites consulted on at June 2022 community consultation

- 5.17** A total of 259 responses were received, suggesting that 70 percent of the residents took part in the consultation. Some 50 percent of responses felt that the proposal for ten houses was about right with 46 percent saying it was too many. In terms of preferred sites, the site at Mildenhall Road was the first choice of 100 people, closely followed by the site opposite the Village Hall with 97 votes.
- 5.18** Informed by the results, the Parish Council responded to the Local Plan Preferred Options consultation to state that it:
- strongly objects to the allocation of the site (ref 5.07a) at Fordham Road, Freckenham for 10 dwellings; and
 - puts forward an alternative site, as preferred by the majority of residents, south of Mildenhall Road (**site 4 on Map 5**).

Neighbourhood Plan approach to housing development

- 5.19** Given the situation with the emerging Local Plan, the Neighbourhood Plan does not allocate any sites for development, deferring this decision to the Local Plan. Had the Neighbourhood Plan allocated the site preferred by residents south of Mildenhall Road it is considered that there would have been a significant risk of a different site being allocated in the Local Plan resulting in two sites being proposed and a potential increase of at least 20 homes in the parish.
- 5.20** Instead the Neighbourhood Plan policies should be used to consider the suitability of proposals on any site in the parish that comes forward for housing development via a planning application.

Local Plan Allocation

- 5.21** Assuming that West Suffolk Council continue to propose a site for ten dwellings in the new Local Plan, it will have to be located outside the Housing Settlement Boundary defined in Policy FRE 1. Where new local plan documents are prepared, Housing Settlement Boundaries can be reviewed and extended to include new allocations. **Whichever site is put forward in the draft Local Plan, it will have to be considered as part of that separate consultation, currently planned for January 2024.**
- 5.22** Based on community engagement carried out in the preparation of the Neighbourhood Plan, it is clear that any site put forward should:
- be well related to the existing settlement and ensure that residents can walk safely to facilities in the village centre;
 - be required to provide traffic calming measures at the entrance to the site to ensure pedestrians can access footways to the village centre;
 - require the affordable housing within the development to be tenure blind and integrate with the market housing;
 - ensure that, in accordance with the policies of this Neighbourhood Plan, the development is designed in accordance with the Freckenham Design Guidance and Codes.

Policy FRE 2 - Housing Allocation

In addition to site specific requirements in the Local Plan, proposals on land allocated for housing in the Local Plan will be supported where they:

- a. incorporate measures to manage traffic safety and speeds on the B 1102 and the provision of safe pedestrian crossing points and footways that will enable occupants to access village facilities on foot;
- b. provide for a mix of sizes and types in accordance with the West Suffolk Local Plan requirements;
- c. retain and enhance existing boundary hedgerows with appropriate buffers. Where hedgerows have to be removed to create an access, new hedgerows shall be planted in accordance with Policy FRE 6;
- d. provide a new landscaped site boundary where necessary;
- e. design the affordable housing provision to be tenure blind' and indistinguishable from the market housing;

Proposals that include an element of self-build housing will be supported.



Dwelling Sizes

5.23 In considering the type and size of new dwellings required in Freckenham, it is evident from the 2021 Census that the parish has a higher proportion of homes with four or more bedrooms than West Suffolk as a whole, as illustrated in Figure 4. However, the 2021 Census also indicated that 57 percent of homes with four or more bedrooms had only one or two occupants.

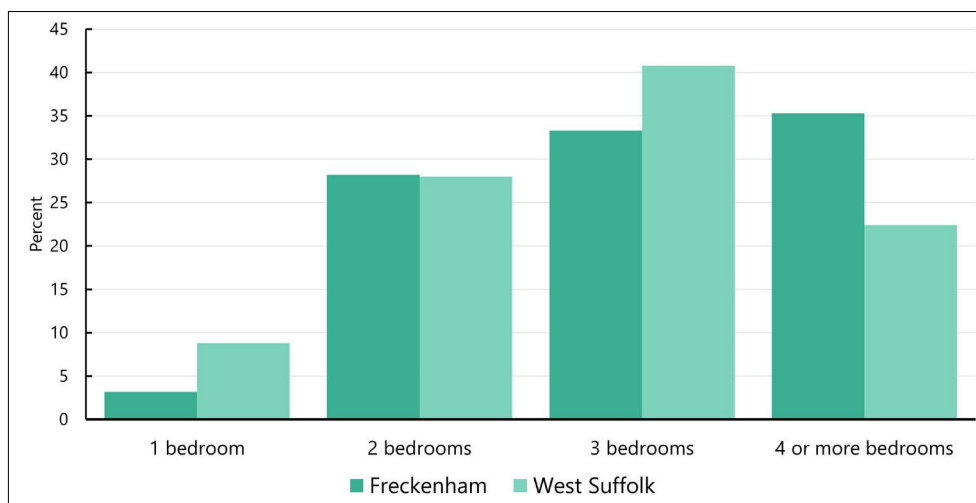


Figure 4 - Dwelling Size Comparison - Freckenham and West Suffolk (Source- 2021 Census)

5.24 The Preferred Options Local Plan consultation identified a need for dwelling sizes to be as follows, and this ratio is supported in the development of any allocated site in Freckenham to redress the current imbalance of larger homes.

Size	Market	Affordable homes to buy	Affordable homes to rent
One bedroom	0-10%	15-25%	30-40%
Two bedrooms	25-35%	40-50%	30-40%
Three bedrooms	40-50%	25-35%	20-30%
Four bedrooms	15-25%	0-10%	0-10%

Housing Design Standards

5.25 The design features of new homes can have a significant impact on the character of an area. The Local Plan already contains detailed policies for the consideration of the potential impact on the character of an area and the amenity of existing residents. In addition, in December 2017, the local planning authority issued a “technical advice note” to achieve minimum internal floorspace standards. The advice note states that “the Government’s national space standards [March 2015] are the minimum acceptable space standards that should be applied to build both open market and affordable housing within West Suffolk. It is the intention of West Suffolk Council to include a policy requirement for all new homes to be built to the national space standards in the next version of their Local Plan. This Technical Advice Note is therefore an interim measure until such time as the new combined West Suffolk Local Plan is published.”

5.26 The 2021 NPPF states that “Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.” The March 2015 standards encourage provision of enough space in homes to ensure that they can be used flexibly by a range of residents. The standards also aim to ensure that sufficient storage can be integrated into dwelling units. It is emphasised that these standards, which are set out in Appendix 2, are expressed as minimum space standards. New homes also need to accommodate ‘home-working’.

- 5.27** Externally, it is also important that homes meet modern day requirements for the storage of wheelie bins and cycles. Without sufficient and appropriate space reserved for these uses, the consequence can be added clutter and a deterrent in the use of cycles as a mode of travel.
- 5.28** Planning policies cannot influence the internal layout of dwellings but, given the generally ageing population, new homes will be particularly welcomed where they meet the accessible homes standards currently set out in Part M of the Building Regulations. Part M defines three levels of housing accessibility:
Category 1: Visitable dwellings – Part M4(1);
Category 2: Accessible and adaptable dwellings – Part M4(2) and
Category 3: Wheelchair user dwellings - Part M4(3).
- 5.29** The current Building Regulations require that all new dwellings to which the Regulations apply should be designed to a minimum of Part M4(1) 'visitable dwellings' standard. Local authorities can opt into the requirements for Part M4(2) and Part M4(3) via Local Plan policy. However, a 2015 Written Ministerial Statement specifies that neighbourhood plans cannot set this standard.



- 5.30** Given the restrictions set out in the Written Ministerial Statement, otherwise acceptable proposals for dwellings in the Neighbourhood Plan Area are particularly encouraged to meet Part M4(2) and M4(3) of the Building Regulations.
- 5.31** The development adaptable and accessible homes will help to ensure that dwellings are appropriate for older persons' needs whilst still meaning that they are suitable for other types of occupiers such as first-time buyers. Building for a Healthy Life is a design toolkit written in collaboration by organisations including Homes England and the Home Builders Federation and endorsed by the Government. It's aims are to achieve well designed neighbourhoods, streets, homes and public spaces and developers of new homes in Freckenham are strongly encouraged to assess their proposals against the toolkit.

Policy FRE 3 - Housing Design

Proposals for new dwellings should achieve appropriate internal space through compliance with the latest Nationally Described Space Standards. Dwellings should also make adequate provision for the covered storage of all wheelie bins and cycles, in accordance with the adopted cycle parking standards.

In addition, all new homes shall provide:

- suitable ducting capable of accepting fibre to enable superfast broadband; and
- one electric vehicle charging point for each on-plot parking space required to meet the current adopted parking standards.

New dwellings should be designed to be adaptable in order to meet the needs of those with mobility restrictions as well as the increasingly aging population, without restricting the needs of younger families, will be supported. Proposals that demonstrate they have taken into account the Building for a Healthy Life toolkit and meet the increasing need for 'home-working' will be supported.

Energy Efficient Homes

5.32 The Centre for Sustainable Energy (CSE), has developed a community carbon calculator in response to a demand from smaller settlements to have robust and accurate data on their carbon footprint, so that they can best direct their efforts to tackle the climate emergency. For Freckenham, as illustrated in Figure 5, it identifies that housing is the biggest source of CO₂e (carbon dioxide equivalent) emissions whereas across Suffolk as a whole, the consumption of goods and services is the biggest source. The actual consumption footprint of households in Freckenham is estimated to be 23.8 tonnes of CO₂e per household a year, 44 percent higher than the average for households across Suffolk.



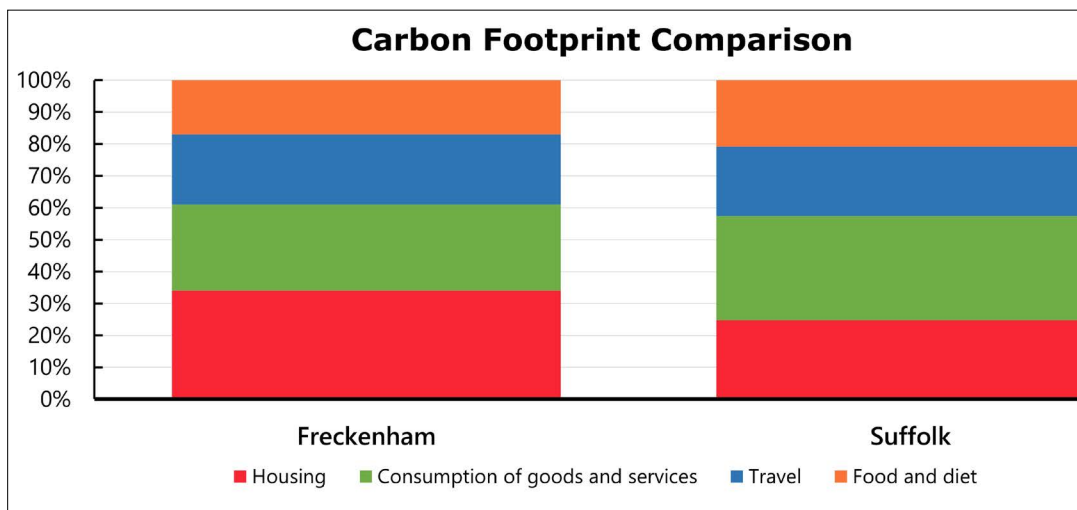


Figure 5 - Freckenham and Suffolk Carbon Footprint Comparison

- 5.33** Energy consumption and the demand for energy is a major determinant of climate change. Where energy use is necessary, then priority should be given to utilising the most sustainable sources. Many energy-saving initiatives can be installed on homes within permitted development rights (when full planning permission is not required) but there may be occasions where schemes that do require planning permission could have a potential adverse impact on the character of the area and the amenity of nearby residents. In line with national government policy, the long-term aim should be to reduce the overall use of all fossil fuels - gas, oil and coal.
- 5.34** The use of heat and power in buildings accounts for 30 percent of the UK's total energy usage. The government has given a commitment to introduce a Future Homes Standard to ensure that new build homes are "future-proofed with low carbon heating and world-leading levels of energy efficiency" with an aim to ensure that new homes built from 2025 will produce 75-80% less carbon emissions than homes built under the current Building Regulations. In 2025, compliance with the Future Homes Standard will become mandatory.
- 5.35** The Preferred Options Local Plan identified an intent to include a planning policy that will address climate change, contribute to the circular economy (a model of production and consumption, which involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products for as long as possible) and to guide sustainable design and construction.

Policy FRE 4 - Low Energy and Energy Efficient Housing Design

Proposals that incorporate current best practice in energy conservation will be supported where such measures are designed to be integral to the building design and minimise any detrimental impact on the building or its surroundings.

Proposals for new dwellings should demonstrate how they:

- maximise the benefits of passive solar gain in site layouts and orientation of buildings; and
- incorporate best practice in energy conservation and are designed to achieve maximum achievable energy efficiency; and
- avoid fossil fuel-based heating systems; and
- incorporate sustainable design and construction measures and energy efficiency measures including, where feasible, ground/air source heat pumps, solar panels, energy storage and grey water recycling, rainwater and stormwater harvesting.

Affordable Housing

- 5.36** The Housing Settlement Boundary enables limited housing development to take place within the defined areas, but such developments would not trigger the requirement to deliver affordable housing as part of the scheme unless the development comprised of ten or more homes or had a site of 0.5 hectares or more. Currently, Policy DM29 of the Joint Development Management Policies Local Plan document enables affordable housing to meet locally identified needs, as an exception, to be built outside the housing settlement boundary. Promoted by the Parish Council and known as “exception sites”, the following conditions would need to be satisfied:
1. A local need has to be established, usually through a detailed parish housing needs survey and/or the West Suffolk Housing Register data; and
 2. A willing landowner prepared to sell land at a price significantly below the market value for housing land; and
 3. A registered social landlord (housing association) willing to work with the Parish Council and District Council to both secure grant funding and manage a scheme.

Furthermore, West Suffolk Council adopted a Supplementary Planning Document in 2019 which, at paragraph 4.51, states that:

“An exception site is normally but not explicitly likely to consist of...no more than five units in a smaller village.”

- 5.37** One option for securing affordable housing that remains available for the local community is through the establishment of a Community Land Trust (CLT), perhaps incorporating nearby smaller parishes. This is a form of community-led housing, set up and run by local people to develop and manage homes as well as other assets. CLTs act as long-term stewards of housing, ensuring that it remains genuinely affordable, based on what people actually earn in their area, not just for now but for every future occupier. A CLT scheme has recently been delivered at Lavenham in Suffolk and Haddenham in Cambridgeshire and opportunities for a similar scheme in Freckenham could be considered should there be an identified local need for affordable housing for those with a local connection.



A Community Land Trust Scheme

6. Natural Environment

Objectives

- 4. Protect and enhance the landscape character of Freckenham including green spaces, woodland and watercourses.**
- 5. Protect important views and links to the wider countryside.**
- 6. Deliver net gains to the extent and quality of natural habitats and biodiversity.**

Context

- 6.1** Freckenham parish is located in a transitional landscape where a range of geological soil profiles meet, which is the key to its existence and appearance today. It sits between the Suffolk Brecklands to the east, on the edge of the Cambridgeshire chalk upland to the south, and on the southeastern edge of the Fens. Suffolk County Council's Landscape Character Assessment (updated 2011) notes that the parish contains three character types; the east is generally considered 'Estate Sandlands', the west 'Rolling Estate chalklands' and with fingers of 'Settled fenlands' coming in from the North.
- 6.2** There are no nationally or locally designated wildlife sites in the parish but the centre of the village is approximately 2.5 kilometres from Chippenham Fen Special Area of Conservation and six kilometres from the Breckland Special Protection Area, both of which are of national significance.
- 6.3** Within and around the built-up area of the village there is a significant spread of individual and groups of trees protected by tree preservation orders, especially in the grounds of Freckenham House between Mildenhall Road and Elms Road. The central open grassland between St Andrew's Church and The Street and in other areas separate groups of buildings and add to the sense of a village where the built-form sits within a landscape setting. Within and around the village there are a number of important views that reinforce the village's setting within the wider and generally flat landscape.

Current Planning Policies

- 6.4** Policy CS2 of the adopted Core Strategy notes that "Areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the District will be protected from harm and their restoration, enhancement and expansion will be encouraged and sought through a variety of measures." It notes that measures will include:
- minimising the fragmentation of habitats, creation of new habitats and connection of existing areas to create an ecological network;
 - promotion of Green Infrastructure enhancement and/or provision on all new developments
 - using Landscape Character Assessment (LCA) to inform development decisions within the District;
 - promotion of green corridor enhancement, such as improvement projects along the River Lark.
- 6.5** Policy CS3 seeks to protect and enhance the landscape character of the former district, noting that "The [Forest Heath] Landscape Character Assessment will inform detailed assessment of individual proposals. All schemes should protect and seek to enhance overall landscape character, taking account of the key characteristics and distinctiveness of the landscape and the landscape setting of settlements."

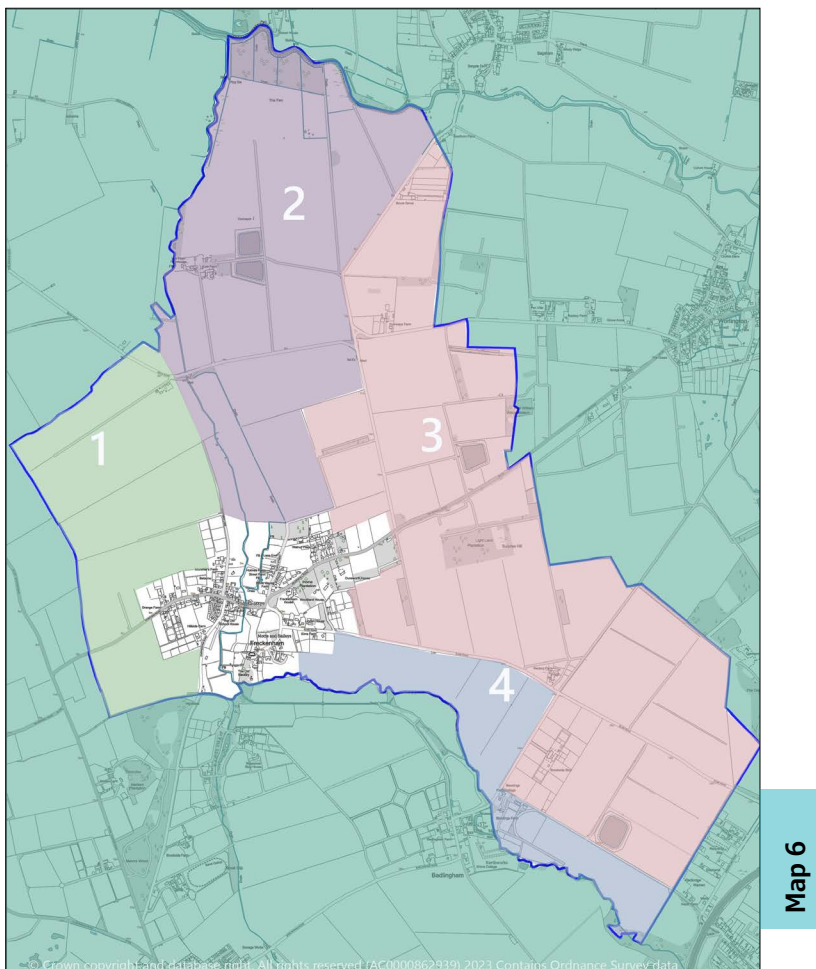
- 6.6** The Joint Development Management Policies Local Plan document contains detailed policies on the protection and enhancement of the natural environment, as listed below:
- Policy DM10: Impact of Development on Sites of Biodiversity and Geodiversity Importance
 - Policy DM11: Protected Species
 - Policy DM12: Mitigation, Enhancement, Management and Monitoring of Biodiversity
 - Policy DM13: Landscape Features
 - Policy DM14: Protecting and Enhancing Natural Resources, Minimising Pollution and Safeguarding from Hazards
- 6.7** The emerging West Suffolk Local Plan is expected to continue to contain policies for the protection and enhancement of the natural environment and will bring the planning policy framework up-to-date.

Residents' Survey

- 6.8** Results from the survey indicated that 90 percent of those that responded thought that preserving existing green spaces and wildlife habitats was important. When asked what concerned them about future development, 104 respondents stated "loss of green spaces / countryside" and 74 said "impact on important views".

NEIGHBOURHOOD PLAN POLICIES - Freckenham's Landscape

- 6.9** As part of the preparation of the neighbourhood plan, a separate Landscape Appraisal has been prepared and which is available to view and download on the neighbourhood plan pages of the Parish Council website. The Appraisal focuses on the character and sensitivity of the parish, identifying four distinct character areas outside the built-up areas of the parish, as illustrated on **Map 6** below.



Map 6 - Landscape Character Areas

- 6.10** The Appraisal suggests the following mitigation guidance to be taken into account when considering development proposals within each of the character areas.

Rural Character Area 1

This landscape is very sensitive to change and development will be hard to integrate. Improving its condition, with structural tree and native edge planting, would improve its capacity to assimilate change. In terms of scale of development, even single buildings or other small changes could be very noticeable and have a big impact, because of the lack of elements to provide integration.

Any change or development proposed here should be in association with carefully conceived planting - although with awareness that inappropriate new planting can introduce visually intrusive elements in this flat and open landscape. Development associated with existing village edge will be easier to integrate than if isolated. Colour is very important and large new buildings, for example new farm sheds, should be appropriately coloured depending on whether seen against the land or sky.

Unconnected with development, planting of field boundaries with hedges and some trees, in association with more ecologically diverse field margins, would provide significant ecological benefit as well as visual interest.

Rural Character Area 2

This landscape is relatively sensitive to change and integration of development will be dependent on scale. Where tree structure exists or where there is existing built form, further small-scale changes such as new farm buildings, can be accommodated, provided overall heights are limited, and materials and colours are appropriate. Existing hedges can be managed at greater height and width and field margins can be planted with rows of pines or narrow plantations. Overall the linearity and geometry of the landscape can be reflected with new planting to strengthen the Breckland edge character. Improving its condition, with native hedges, would improve its capacity to assimilate change. Planting of field boundaries with hedges and tree lines, in association with margins would provide significant ecological benefit as well as visual interest.

Large scale changes would be much harder to accommodate. Part of this area is under consideration for a large scale solar farm. This character area has much less capacity than the more wooded and contained landscape to the west and south, the openness means that large scale landscape change would be very noticeable from the wider landscape and impacts would be felt across a wide area.

Rural Character Area 3

Some types of change are likely to be accommodated without significant harm, especially if related to the agricultural purposes of the landscape. Its regular geometry can be adjusted relatively easily and its character is robust enough to withstand limited change, where well wooded. It is more sensitive where it is more open.

Where its lacking, new boundary planting in the form of plantations, hedges and pine line are appropriate to improve the condition of the landscape. The linearity and geometry of the landscape can be reflected with characteristic new planting to strength the Breckland character. Planting behind development can be as effective as planting in front of it (long term), to maintain distinctive skylines and absorb development below. (*continued*)

But whilst regularised, simple landscapes have better capacity than more ancient landscapes, it's a question of identifying appropriate scale and location to avoid an unacceptable visual impact and erosion of character.

Part of this area is under consideration for a large scale solar farm. The landscape does have some capacity, in landscape character terms, for solar arrays, provided it is associated with existing woodland structure. By using and extending the existing woodland structure to help assimilate and provide screening, arrays contained in land parcels surrounded by belts of woodland would, over time, become well assimilated although the loss of openness would have to be accepted. Impacts at first however could be sizeable - large scale land use change could result in substantial visual impacts that local communities will find challenging.

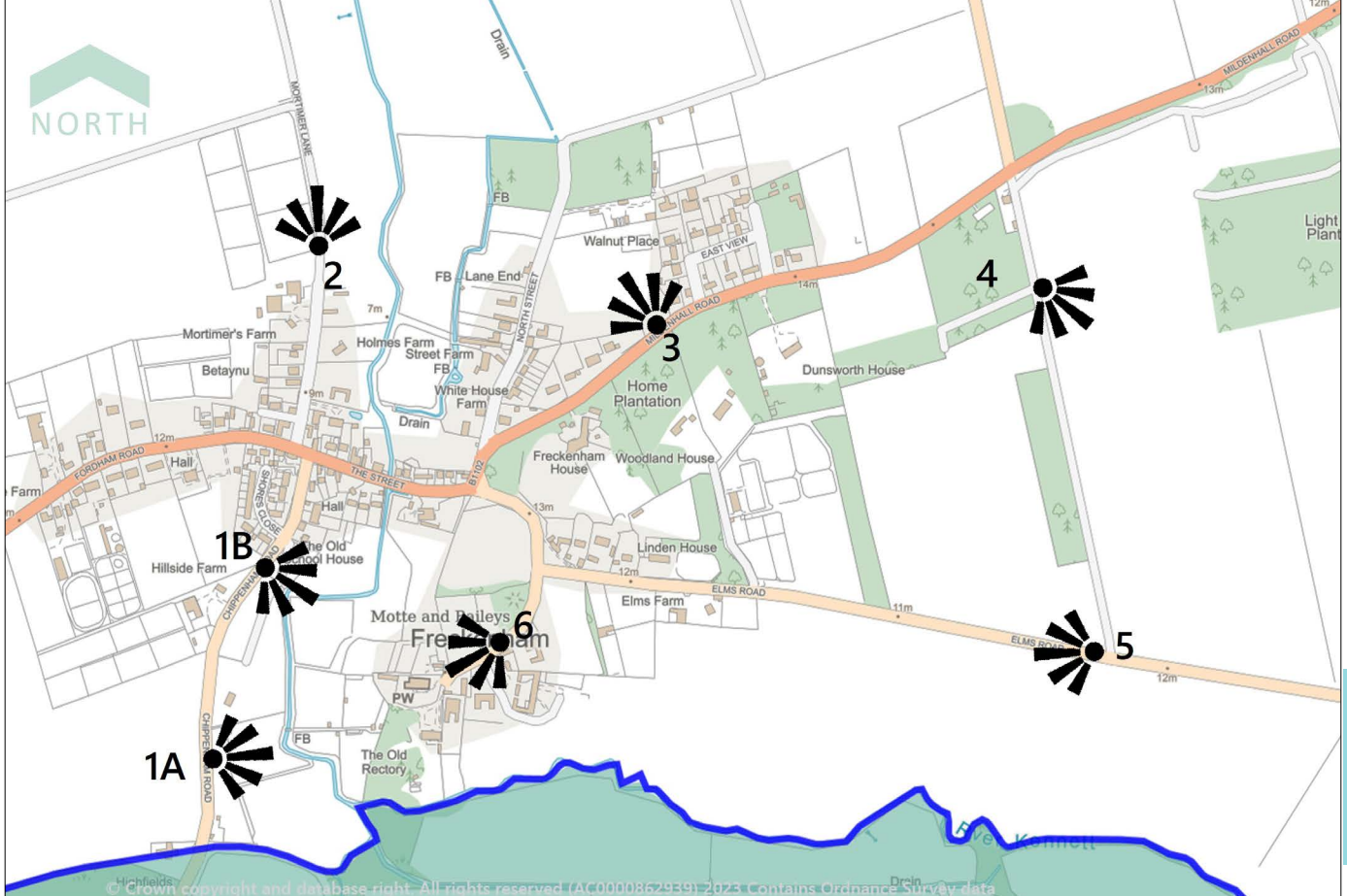
Rural Character Area 4

Development in this parcel could cause harm if it noticeably interrupts the integrity of the unspoilt valleyside, interferes with views across the valley, or to the church tower.

Improving the condition of the landscape would improve its capacity to withstand change. The vegetated riparian corridor and the well wooded nature of the adjacent character areas provides a structure to tie new native tree and hedge planting into. If new development was designed with appropriate vegetated boundaries it could be assimilated but taking small 'bites' out of it would be harmful. Fast growing screening species such as willow and poplar could be appropriate in this character area.

Important Views

- 6.11** A 'key' view is one that would be generally recognised as having notable qualities or features, landmarks, or a particularly attractive composition that might cause people to pause and appreciate the scene. It is from a publicly accessible location and likely to feature in people's perceptions of what Freckenham looks like in their memories.
- 6.12** A separate Key Views Assessment has been prepared and is available to view on the Neighbourhood Plan pages of the Parish Council website. It notes that "there is not an accepted definition of what constitutes an important view, in any of the published and accepted landscape guidance. The selection of views is also a result of people's perceptions, so is somewhat subjective." However, for the purposes of the Neighbourhood Plan, a key view is defined as:
a publicly accessible viewpoint that reflects the most distinct and unique characteristics of the Neighbourhood Area. It is memorable and appreciated, and evokes positive emotions. It encompasses an important feature of the village's settlement history and the way its landscape has been shaped by those who have lived and worked in it, and by nature. It may be said to be worthy of being illustrated in a photo, postcard or painting and as such would best represent a special element of the village's identity.
- 6.13** Seven key views have subsequently been identified, as illustrated on **Map 7** and the Assessment identifies the key features of each view and the objectives to manage any change within the view.



Map 7 - Important Views

Policy FRE 5 - Protecting Freckenham's Landscape Character

Proposals must, proportionate to the development, demonstrate how the landscape characteristics of the site and its vicinity have been considered in preparing the scheme and having regard to the guidance contained in the Freckenham Landscape Assessment 2020.

As appropriate to their scale, nature and location and to ensure that they conserve the essential landscape, heritage and rural character of the parish, development proposals should demonstrate how they:

- i. have regard to, and conserve, or enhance, the landscape character and the setting of the parish, as referenced in the Freckenham Landscape Appraisal; and
- ii. will ensure that there is no unacceptable impact on the key features of the important views identified on the Policies Map.

Habitats

6.14 Across the parish the influence of trees and hedgerows play a significant role in determining the character of the area. This is evidenced by individual specimen trees, tree belts, such as the pine belts north and east of the village and woodland. Priority Habitats, which are those which have been deemed to be of principal importance for the purpose of conserving biodiversity, are found across the parish and are identified on the map in Appendix 3. The combined effect of screening, providing natural habitats, and wildlife corridors that these habitats create are vitally important within the parish and the wider area and their retention and enhancement will be supported.

6.15 Currently the NPPF encourages net gains for biodiversity to be sought through planning policies and decisions. In November 2021 the Environment Bill received Royal Assent. It introduced a statutory requirement for all appropriate developments to deliver a minimum

10 percent measurable net gain in biodiversity. While the Environment Act 2021 sets out the core components (from the use of a metric, a system of national credits, a register of net gain and more), the details of how biodiversity net gain will work is, at the time of preparing this Plan, still in development ahead of the requirement becoming mandatory early in 2024. Natural England has published a "Biodiversity Metric (3.0)" which is expected to be the standard measuring methodology to appraise how development will meet the requirements of the Act.

- 6.16** There may be occasions where a new access to an otherwise acceptable development site would result in the loss of part of an existing hedgerow. Where this is necessary, a new hedgerow should be planted using native species of a local provenance at the rear of the visibility splay returns to minimise the loss of hedgerow and habitat and maintain the character of the area.
- 6.17** The River Kennet/Lee Brook is an important watercourse passing through the parish on its way to the River Lark, which forms the northern boundary to the parish and provides a wildlife habitat that adds to the rich biodiversity network.

Policy FRE 6 - Biodiversity and Habitats

Development proposals should avoid the loss of, or substantial harm to, trees, hedgerows and other natural features such as ponds and watercourses. Where such losses or harm are unavoidable:

- i. the benefits of the development proposal must be demonstrated to clearly outweigh any impacts; and
- ii. suitable mitigation measures, that provide better replacement of the lost features will be required to achieve measurable biodiversity net gain.

Any such mitigation measures should form an integral part of the design concept. In addition, the layout and design of the development proposal concerned should be landscape-led and appropriate in relation to its setting and context and have regard to its ongoing management.

Where new access is created, or an existing access is widened, through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity.

Proposals will be supported where they integrate improvements to biodiversity which will secure a measurable net gain as part of the design through, for example,

- a. the creation of new natural habitats including ponds;
- b. the planting of additional native trees and hedgerows (reflecting the character of Freckenham's traditional trees and hedgerows);
- c. restoring and repairing fragmented wildlife networks, for example, including swift-boxes, bat boxes and holes in fences which allow access for hedgehogs.

Green Spaces

6.18 There are a number of important open areas within the parish that make important contributions to the character and setting of the built environment. The NPPF enables the designation and protection of land of particular importance to local communities as Local Green Spaces ('LGS') in neighbourhood plans. Such designations rule out new development other than in very special circumstances. Paragraph 102 of the NPPF states that the designation should only be used where the green space is:

- in reasonably close proximity to the community it serves;
- demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

It is recognised that the designation of Local Green Spaces should not be used simply to block development.

6.19 A separate Local Green Space Appraisal has been undertaken as part of the preparation of the Neighbourhood Plan, which demonstrates how certain local spaces meet the criteria in paragraph 102 of the NPPF. The spaces that meet the criteria are identified in Policy FRE 7 and are illustrated on **Map 8** and the **Policies Map**.



Map 8 - Local Green Spaces

6.20 The identification of these spaces as Local Green Space means that development is restricted to that which has to be demonstrated as being essential for the site, in line with the Green Belt policies defined by the NPPF. Permitted development rights, including the operational requirements of infrastructure providers, are not affected by this designation. Policy FRE 7 follows the matter-of-fact approach in the NPPF. In the event that development proposals come forward on the local green spaces, they can be assessed on a case-by-case basis by West Suffolk Council. In particular, it will be able to make an informed judgement on the extent to which the proposal concerned demonstrates the 'very special circumstances' required by the policy.

Policy FRE 7 Local Green Spaces

The following Local Green Spaces are designated in this Plan and identified on the Policies Map:

1. Orchard off Church Lane
2. Castle Mound, Church Lane
3. The Old Cricket Ground
4. Meadow rear of The Golden Boar
5. Village Playing Field
6. The Old Marl Pit
7. Parkland area between Mildenhall Road and North Street
8. Paddock north of The Street
9. Parish Allotments

Development in the Local Green Spaces will be consistent with national policy for Green Belts.



7. Built Environment & Design

Objectives

- 7. Conserve and enhance the village's heritage assets.**
- 8. Ensure that new development is designed in a way that reflects local character.**
- 9. Reduce the impact of new development through the incorporation of measures that reduce their environmental impact.**

Context

- 7.1** As already noted, Freckenham as a village can be traced back over 1,000 years with the most visual evidence today being the castle mound which is a scheduled monument. In addition there are 11 listed buildings in the parish as identified in Appendix 4, and the central part of the village is designated as a conservation area. It is also known that the area is rich in archaeological finds. Suffolk County Council Archaeological Service's Historic Environment Record provides details of finds and the Service should be consulted at the earliest possible stages of preparing a planning application.
- 7.2** Buildings within Freckenham range from 1-2.5 storeys detached or semi-detached typologies across both historic and modern developments. A significant feature of Freckenham is the 1.5 storey dwelling with dormer windows. This characteristic minimises the presence of the building while creating an attractive roof-line and delivering buildings that are effectively 2-storey in terms of usable floorspace.
- 7.3** Buildings in Freckenham are formed of materials and details that are important to the character of the village.

Brickwork

Brick is a common facing material for buildings within the village and there are also many boundary walls made of brick in the village that contribute to the street character. The bricks used in the village are red or yellow and laid in English bond or Flemish bond with a lime mortar.

Flint Rubble Walls

Flint rubble or knapped flint walls are a distinctive feature of Freckenham, such as the boundary wall at the junction of Elms Road and Church Lane and the detached house on the northern side of The Street.

Render and Pargeting

Several buildings are faced in rendered brickwork. These sometimes feature relief patterns called pargetting and coloured in lime wash in pastel tones.

Clunch or Hard Chalk Block Walls

Clunch or chalk blocks are common building materials in the locality, and it is thought that chalk was quarried from an area between Church Lane and Mildenhall Road.

Roof Forms and Materials

Mansard roof forms are common in Freckenham. These roof forms allowed a greater headroom. Chimney stacks and prominent chimneys on gable ends, are important features in the roof-scape that indicate the date and layout of a building.

A range of roofing materials can be seen on existing dwellings within Freckenham. Hand made red and grey clay plain tiles and pantiles commonly feature. These vary in terms of profile and colour compared with machine made, concrete tiles, which have been more commonly used on late 20th Century development in the village. Other materials used locally include slate tiles, laid in diminishing courses and there are also several examples of decorative thatched roofs.

Current Planning Policies

- 7.4** The NPPF notes that heritage assets (see Glossary) “are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.” The NPPF also makes it clear, in paragraph 124, that ‘good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.’ In January 2021 the Government published the National Design Guide to illustrate how well designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. It ‘provides a structure that can be used for the content of local design policies, guides and codes, and addresses issues that are important for design codes where these are applied to large scale development on single or multiple sites.’ This was followed up in July 2021 by the more detailed National Model Design Code which sets out guidance for what could be included in a Design Code for sites and places.
- 7.5** Policy DM15: Listed Buildings, in the Joint Development Management Policies Local Plan document sets out the considerations and criteria against which proposals to alter, extend or change the use of a listed building, or development affecting its setting will be considered. In addition, Policy DM18: New Uses for Historic Buildings addresses how proposals for the adaptation and re-use of historic buildings will be considered. Policy DM2: Creating Places - Development Principles and Local Distinctiveness, in the Joint Development Management Policies Local Plan document sets out a range of criteria against which all development proposals, as appropriate to their scale, will be considered by West Suffolk Council. Other relevant adopted policies are:
- Policy DM6: Flooding and Sustainable Drainage
 - Policy DM7: Sustainable Design and Construction
- 7.6** West Suffolk Council are proposing a strategic policy in the emerging Local Plan to cover development design across the wider district. The emerging Local Plan also proposes to carry forward policies for the protection and management of heritage assets.

Residents’ Survey

- 7.7** When residents were asked what concerned them most about any future development, 65 percent of those that responded said “development not fitting in with the character of the village” and 68 percent said “loss of village identity”.
- 7.8** The survey asked how important it is that development respects certain characteristics. The results are illustrated in Figure 6.

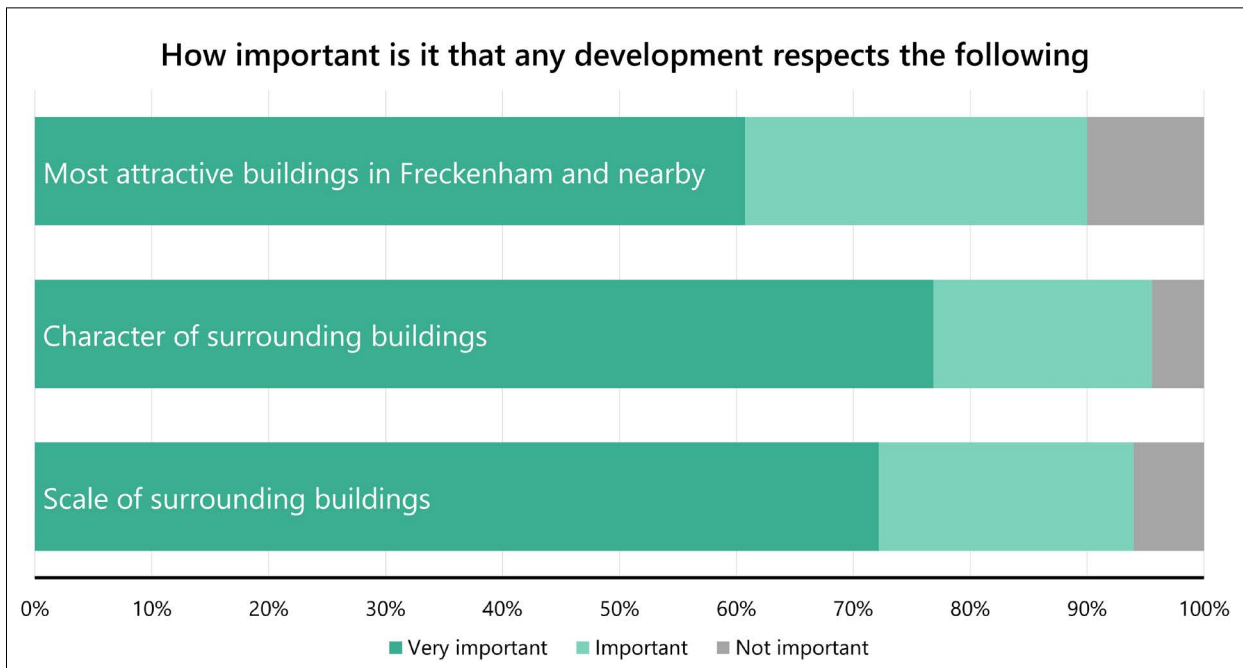
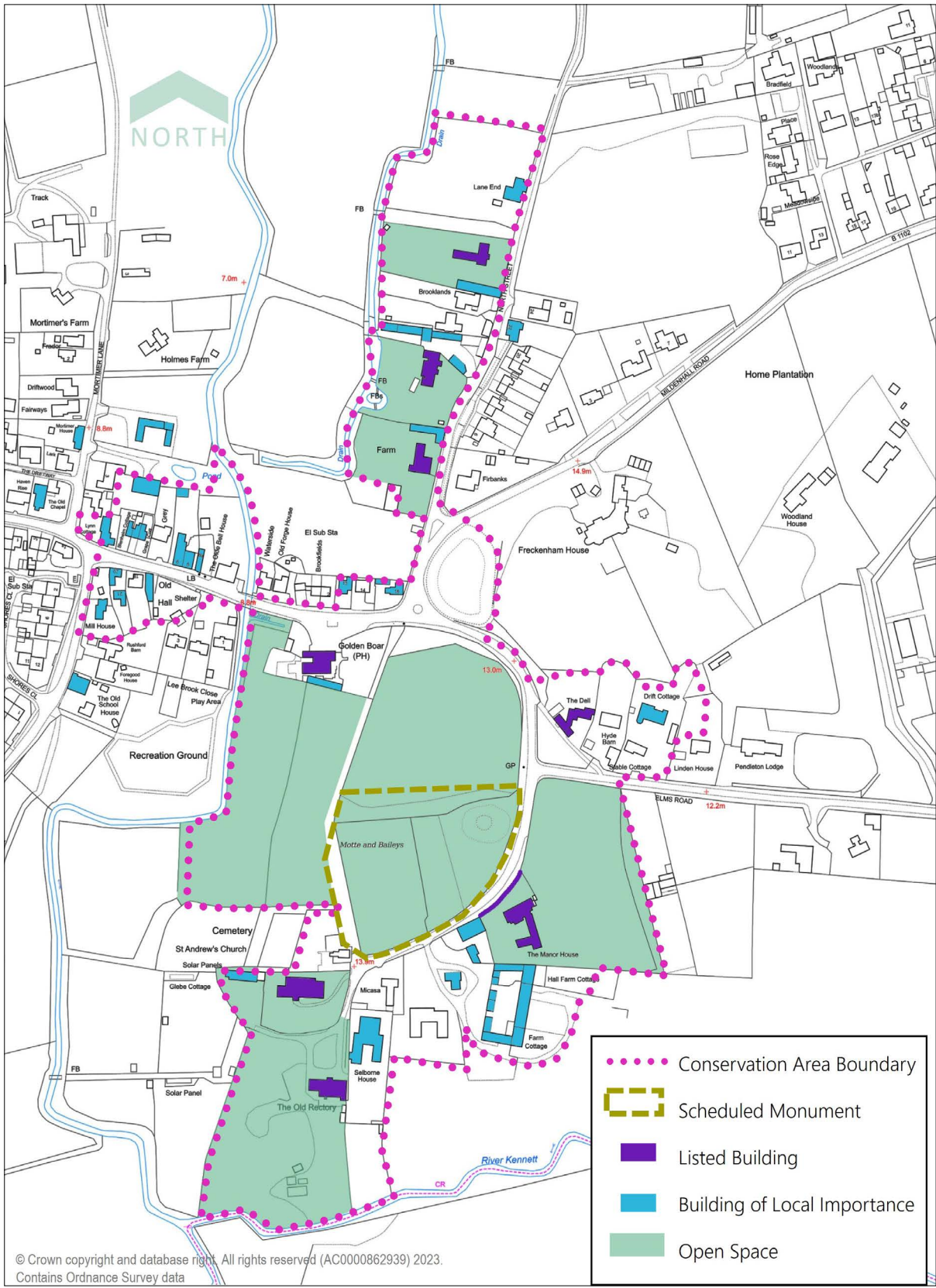


Figure 6 - Importance of development respecting identified aspects (2019 Survey)



NEIGHBOURHOOD PLAN POLICIES - Built Heritage

- 7.9** In 1993 the former Forest Heath District Council designated a conservation area covering the centre of the village which, following the preparation of the Freckenham Conservation Area Appraisal (2010), was extended and now covers the area illustrated on **Map 9**. The Appraisal, which is available to view on the conservation areas and appraisals page of the West Suffolk Council website, identified a number of (primarily private) open spaces and buildings of local importance both within and within the setting of the conservation area. A description of some of the buildings of local importance was contained in an Appendix of the Appraisal and the published details are contained in Appendix 3 of this Plan.



Map 9 - Conservation Area Appraisal Features

7.10 It is important that development proposals have regard to the findings of the Conservation Area Appraisal, in particular as they relate to identified important open areas and buildings of local importance.

Policy FRE 8 - Freckenham Conservation Area

Development within, affecting the setting of, or affecting views into or out of the Conservation Area should conserve, or where appropriate enhance, features that contribute positively to the area's special character, appearance and setting, including identified important open areas and buildings of local importance, as identified in the Freckenham Conservation Area Appraisal.

Development Design

- 7.11** In January 2021, AR Urbanism were commissioned as part of the Government's Neighbourhood Planning support programme to prepare Design Guidance for the Neighbourhood Plan Area on behalf of the Parish Council. The document, published separately on the Neighbourhood Plan pages of the Parish Council's website, provides guidance that seeks to inform the design that all development should follow in order to retain and protect the character and distinctiveness of Freckenham. The Design Guidance document should be used alongside the National Model Design Codes published by the Government in July 2021, or any subsequent published national as well as district level guidance.
- 7.12** The Design Guidance document contains design codes which work in tandem with the Freckenham Neighbourhood Plan (FNP) to provide guidance on the built form, layout and sustainability of development, which must be designed and constructed to perform to increasingly low-carbon requirements set by central and local government. The Guidance also contains the following urban design principles to which new development will be expected to have regard.

Design Principles

- Ensure the layout and scale of new development reinforces the distinctive character of the village.
 - Conserve and enhance the rural landscape of the Parish by preserving the existing open views and natural green buffers, including hedgerows and mature trees.
 - New development should improve access routes for new and existing residents. This involves improving connections to the rural landscape and creating safer footpaths that connect development in the east of the village to the village centre.
 - Ensure new development provides homes and spaces that are well-designed for all ages, including older residents, young families, teenagers and children, and people with mobility-related disabilities. This should take into account the impact of Covid-19, recent changes in working patterns and the increased opportunity for residents to work from home.
 - The overall site layout should maximise opportunities for residents to live sustainable lifestyles. The orientation of buildings and plots should respond to the site's environmental opportunities and constraints.
- 7.13** The Design Guidance provides a development management checklist against which development proposals should seek to respond where applicable. The checklist is included as Appendix 6 of the Plan.

Policy FRE 9 - Development Design Considerations

Proposals for all new development must reflect the local characteristics and circumstances of the site by creating and contributing to a high quality, safe and sustainable environment. Planning applications should demonstrate how they satisfy the requirements of the Development Design Checklist in Appendix 6 of this Plan, as appropriate to the proposal.

In addition, proposals will be supported where they:

- a. recognise and address the key architectural features, characteristics, landscape/building character, local distinctiveness and special qualities of the area and, where necessary, prepare a landscape character appraisal to demonstrate this;
- b. maintain the village's sense of place and/or local character, as identified in the Freckenham Design Guidance and Codes and the Freckenham Conservation Area Appraisal;
- c. do not involve the loss of gardens, important open, green or landscaped areas, which make a significant contribution to the character and appearance of that part of the village;
- d. taking mitigation measures into account, do not affect adversely and, where appropriate enhance:
 - i. any historic, architectural or archaeological heritage assets of the site and its surroundings, including Listed Buildings and the Buildings of Local Significance identified in the Freckenham Conservation Area Appraisal;
 - ii. important landscape characteristics including trees and ancient hedgerows and other prominent topographical features;
 - iii. identified important views into, out of, or within the village as identified on the Policies Map;
 - iv. sites, habitats, species and features with biodiversity and ecological interest;
 - v. the residential amenity of adjacent areas by reason of noise, smell, vibration, overlooking, overshadowing, loss of light, other pollution (including light pollution), or volume or type of vehicular activity generated;
- e. do not locate sensitive development where its users and nearby residents would be significantly and adversely affected by noise, smell, vibration, or other forms of pollution from existing sources, unless adequate and appropriate mitigation can be implemented;
- f. produce designs that respect the character, scale and density of the locality;
- g. include tree-lined streets unless in specific cases there are clear, justifiable and compelling reasons why this would be inappropriate and include trees elsewhere within developments where the opportunity arises.
- h. produce designs, in accordance with adopted standards, that maintain or enhance the safety of the highway network, ensuring that all residents vehicle parking is provided within the plot and that spaces and garages meet the adopted minimum size standards;
- i. seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement;
- j. wherever possible ensure that development faces on to existing roads;
- k. do not result in water run-off that would add-to or create surface water flooding;
- l. where appropriate, make adequate provision for the covered storage of all wheelie bins and cycle storage in accordance with adopted cycle parking standards; and
- m. include suitable ducting capable of accepting fibre to enable superfast broadband.

Climate Change

- 7.14** Energy use in the construction and operation of development is currently a major contributor to greenhouse gas emissions. Minimising energy demands from development and increasing the generation of energy from renewable sources, together with battery storage can make a significant contribution to reducing carbon emissions as well as reducing demand from the grid. The starting point for minimising energy use is to maximise energy efficiency, both in new developments and through the retrofitting of existing buildings. This can have a direct economic benefit in terms of significantly lowering the running costs of new and existing buildings, helping to address fuel poverty, as well as tackling the Climate Crisis. The Building Regulations set minimum energy efficiency requirements of for new development but exceeding the minimum requirements will be necessary if emission reduction targets are to be met by using proven new technology and smart systems.
- 7.15** Where energy use is necessary, then priority should be given to utilising the most sustainable sources. Many energy saving initiatives can be installed on homes within permitted development rights (when full planning permission is not required) and residents are encouraged to implement such measures. There may be occasions where schemes that do require planning permission could have a potential adverse impact on the character of the area and the amenity of nearby residents. The Neighbourhood Plan has limited powers to require developments to meet energy saving standards, especially in the construction of new homes. However, that does not stop the encouragement of the incorporation of measures in development that meet the energy hierarchy (in order of preference) of:
1. Minimising energy demand;
 2. Maximising energy efficiency;
 3. Utilising renewable energy and energy storage;
 4. Utilising low carbon energy; and
 5. Utilising other energy sources including passive solar.

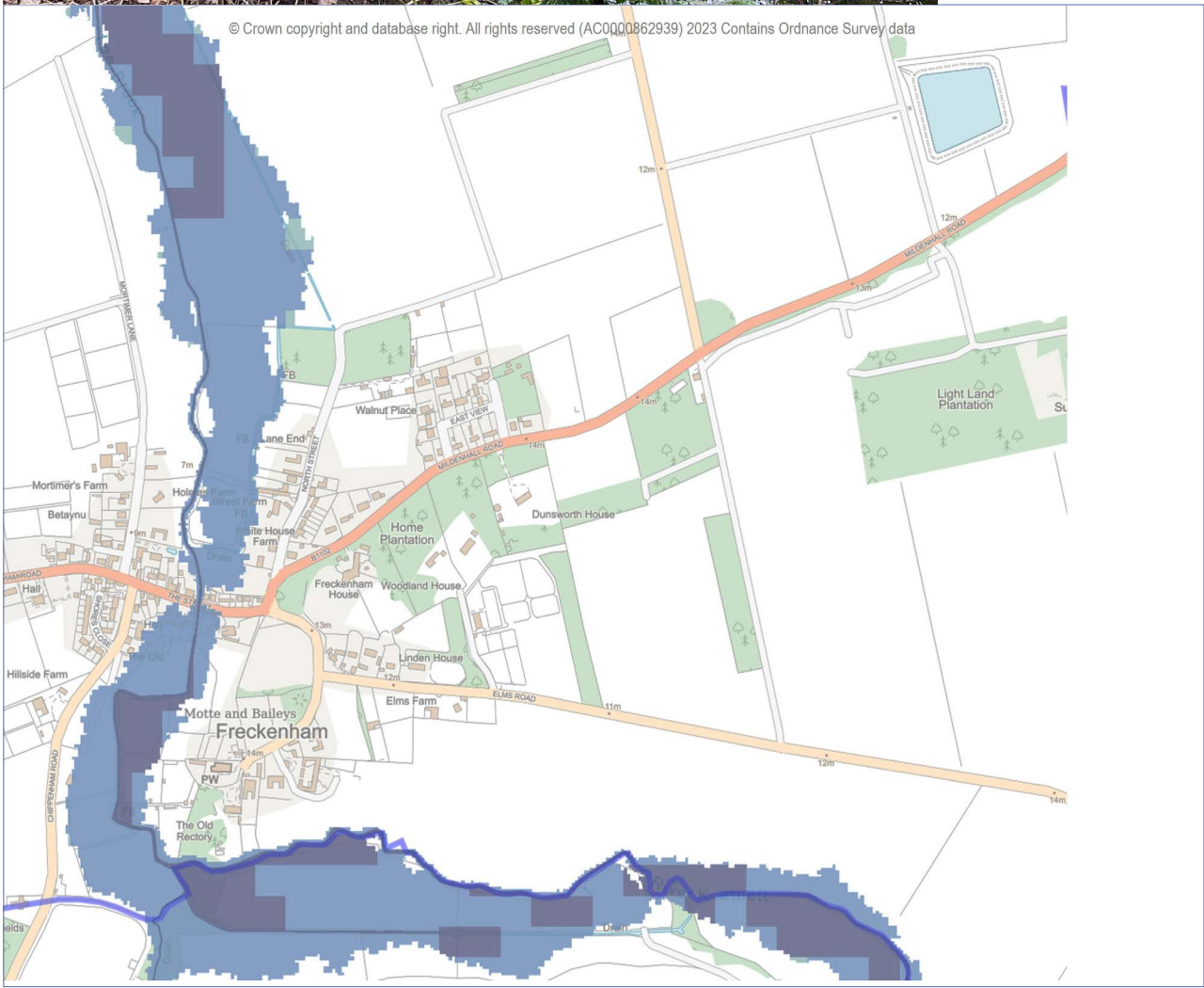
Policy FRE 10 - Sustainable Construction Practices

For all appropriate development, proposals that incorporate current best practice in energy conservation will be supported where such measures are designed to be integral to the building design and minimise any detrimental impact on the building or its surroundings. Development proposals should demonstrate how they:

- a. maximise the benefits of solar gain in site layouts and orientation of buildings;
- b. incorporate best practice in energy conservation and be designed to achieve maximum achievable energy efficiency;
- c. avoid fossil fuel-based heating systems;
- d. incorporate current sustainable design and construction measures and renewable energy measures, such as, where feasible, ground/air source heat pumps, solar panels, thermal and PV systems and energy storage; and
- e. make provision for grey water/rainwater, and/or surface water harvesting and recycling and, where appropriate, incorporate water attenuation areas with biodiversity and landscape diversity that create high-quality public open spaces.

Flooding and Sustainable Drainage

- 7.16** Unsurprisingly, much of the land in the vicinity of the River Kennet / Lee Brook is within Environment Agency designated Flood Zone 2 or 3, with Zone 3 having the highest risk of flooding. The area affected in the centre of the village is illustrated on **Map 10**.



Map 10

Map 10 – Zone 2 and 3 Flood Areas (Source – Environment Agency)

7.17 National planning policy restricts the type of development that can take place in the areas likely to flood. It is essential that development proposals do not add to this risk through creating surfaces where rainwater can run-off into the highway or neighbouring sites and create new or exacerbate existing surface water flooding problems. New development will be required, where appropriate, to make provision for the attenuation and recycling of surface water and rainwater through Sustainable Drainage Systems (SuDS) that might include on-site rainwater and stormwater harvesting and greywater recycling, and the management of run-off and water management in order to reduce the potential for making the situation worse.

Policy FRE 11 - Flooding and Sustainable Drainage

Proposals for new development, or the intensification of existing development, in Flood Zones 2 and 3 should be accompanied by a Flood Risk Assessment and will not be permitted, unless the applicant has satisfied the safety requirements in the Flood Risk National Planning Policy Guidance (and any successor).

Proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site surface water drainage and water resources will be managed so as not to cause or exacerbate surface water and fluvial flooding elsewhere.

Proposals should, as appropriate include the use of above-ground open Sustainable Drainage Systems (SuDS). These could include:

- wetland and other water features, which can help reduce flood risk whilst offering other benefits including water quality, amenity/ recreational areas, and biodiversity benefits; and
- rainwater and stormwater harvesting and recycling; and other natural drainage systems where easily accessible maintenance can be achieved.

Wastewater

- 7.18** It will be essential that, depending upon the scale of development, wastewater generated by the development can be managed and disposed of safely. Developers should investigate that adequate capacity exists in the network at the design stage and consider sustainable alternatives should capacity not exist or be capable of being provided.

Light Pollution

- 7.19** Paragraph 180 (c) of the NPPF states that planning policies and decisions should “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation”. Artificial lighting of development, while increasing a sense of security, can also impact upon residential amenity, the character and appearance of an area (particularly rural locations) and the environment. Aspects such as poor design, location or the expulsion of unnecessarily high levels of light can also have a harmful impact.

Policy FRE 12 - Dark skies

Dark skies are to be preferred over lighting while ensuring that new developments are secure in terms of occupier and vehicle safety. Any future outdoor lighting systems should have a minimum impact on the environment, minimising light pollution and adverse effects on wildlife, subject to highway safety, the needs of particular individuals or groups, and security. Schemes should reduce the consumption of energy by promoting efficient outdoor lighting technologies, keeping the night-time skies dark and reducing glare.

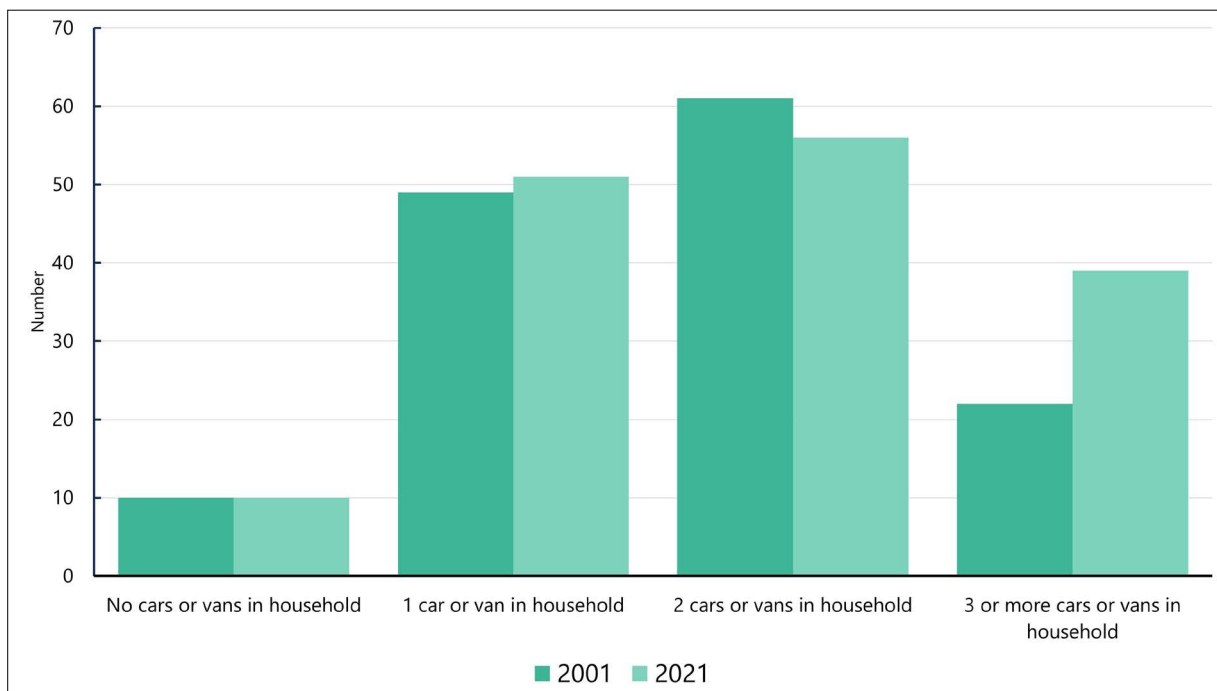


Figure 7: Car ownership comparison

Parking Standards

7.20 Car ownership levels across the parish are generally higher than West Suffolk as a whole, as illustrated in Figure 7. Almost 61 percent of households had 2 two or more cars at the time of the 2021 Census, compared with 43 percent across West Suffolk as a whole. The high levels of car ownership are expected to continue, especially given the trend over recent years for adult children to remain in the family home for longer and the continuing decline of bus services. These higher levels of car ownership lead to an increased pressure on space both within the grounds of established dwellings and on the roads in the vicinity.

7.21 Paragraph 107 of the NPPF states that, "If setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles."

7.22 The Suffolk County Council Parking Guidance (2019) for residential development acknowledges that providing a reduced number of parking spaces at a travel origin does not effectively discourage people from owning a car unless heavily restricted and alternative modes of transport are available. It states that parking guidance for origins should be used as a minimum advisory standard. The 2019 standards for residential development are reproduced below:

Dwelling Size	Current Minimum Requirement
1 bedroom	1 space per dwelling
2 bedrooms	2 spaces per dwelling
3 bedrooms	2 spaces per dwelling
4+ bedrooms	3 spaces per dwelling

7.23 Given the higher levels of car ownership in Freckenham, it is therefore reasonable that parking standards should also be set at a higher level than the recommended minimum requirements. For all developments, the minimum parking spaces required for each new dwelling shall be as set out below:

Dwelling Size	Freckenham Minimum Requirement
1 bedroom	2 spaces per dwelling
2 bedrooms	2 spaces per dwelling
3 bedrooms	3 spaces per dwelling
4+ bedrooms	3 spaces per dwelling

7.24 On-street car parking can have a significant impact on a locality and have a detrimental impact on the ability for emergency services to respond to calls. Given the road structure in Freckenham comprising narrow lanes or B class roads, it is generally not appropriate to make provision for visitor car parking on the highway. It is therefore essential that all vehicle parking is integrated into the development site without creating an environment dominated by vehicles.

7.25 The transition from petrol/diesel vehicles to electric during the lifetime of the Neighbourhood Plan is going to require retro-fitting vehicle charging points at homes and businesses. For new developments, it is essential that adequate provision is made for the change to electric vehicles and although the 2019 "County Council Guidance for Parking" provides minimum requirements for electric vehicle charging, it is considered that the residential requirements (to provide ducting and suitable consumer unit to allow the install of one wall charging unit per dwelling when required by householder) does not future proof development and that for all every new residential parking space required by the minimum standards should have a charging point.

Policy FRE 13 - Parking Standards

Development proposals should maintain or enhance the safety of the highway network ensuring that all vehicle parking is designed to be integrated into the site without creating an environment dominated by vehicles.

In residential developments the following minimum provision shall be made within the curtilage of the dwelling:

Dwelling Size	Minimum Requirement
1 bedroom	2 spaces per dwelling
2 bedrooms	2 spaces per dwelling
3 bedrooms	3 spaces per dwelling
4+ bedrooms	3 spaces per dwelling

For every new dwelling, two electric vehicle charging points shall be provided.

All new non-residential development should include electric vehicle EV charging provision in accordance with the minimum standards in the current Suffolk Parking Guidelines.

Cycle parking provision shall be in accordance with the adopted cycle parking standards and shall include secure and covered storage where appropriate to the development.

8. Services and Facilities

Objectives

- 10. Minimise the impact of development on the capacity of essential infrastructure and services.
- 11. Protect and improve the range of existing community facilities and services.

Context

- 8.1 The Village currently has very little in the way of services and facilities, consisting of:
- The Village Hall
 - The Golden Boar Public House
 - The Playing Field including play equipment
 - Allotments
 - St Andrews Parish Church

The mobile library calls once a month on a Wednesday, parking up at the Golden Boar between 16.25 and 16.40. Bus services are dealt with in the highways and travel section of the Plan.

Residents' Survey

- 8.2 Residents were asked how often they used facilities in the village. The results are illustrated in Figure 8.

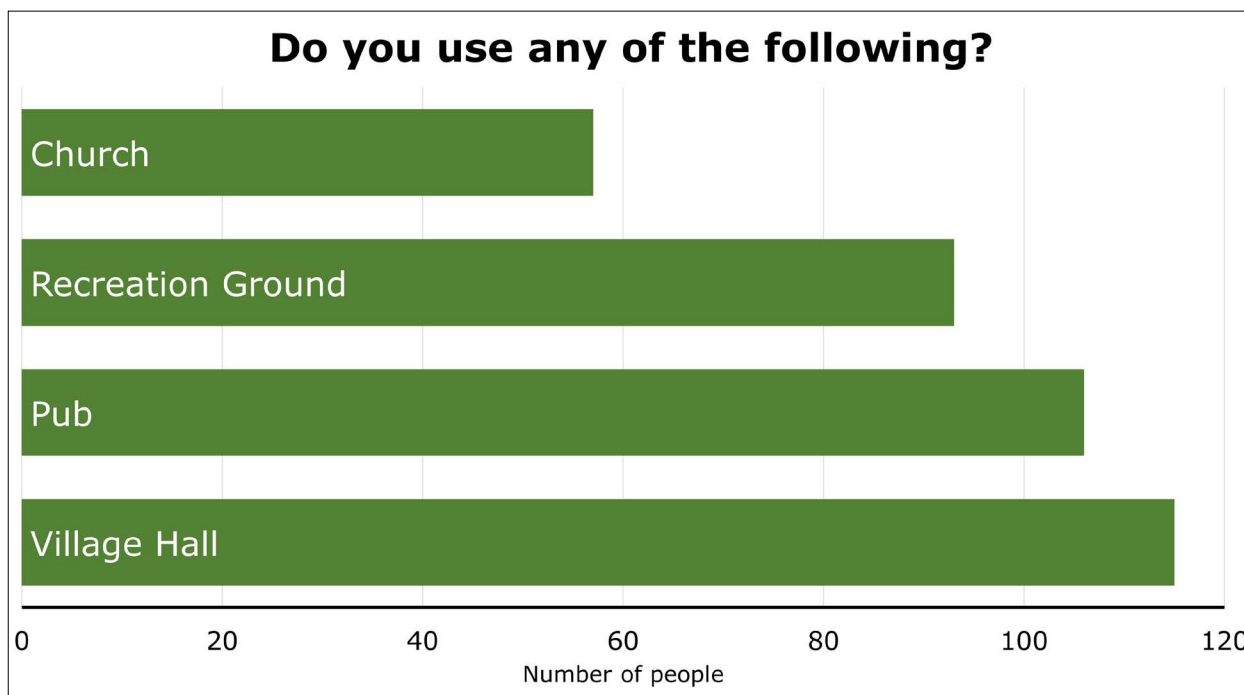


Figure 8 - Use of facilities (2019 Survey)

Current Planning Policies

- 8.3** Paragraph 84 of the NPPF states that planning policies and decisions should enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship. Further, paragraph 93 states that planning policies and decisions should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;
- 8.4** At a local level, the West Suffolk Joint Development Management Policies Local Plan document contains Policies DM41: Community Facilities and Services and DM 42: Open Space, Sport and Recreation Facilities. Each seeks to retain existing facilities and provide a basis for the provision of new facilities, especially as part of larger developments.
- 8.5** The Preferred Options West Suffolk Local Plan consultation stated an intent to carry such policies forward into the new Local Plan.

Neighbourhood Plan Policies

- 8.6** The Neighbourhood Plan has an important role in making sure that there are sufficient and adequate services in the village to meet the needs of current and future residents. The village hall and recreation ground provide central facilities for both formal and informal recreation and the Golden Boar public house and Parish Church also have an important role in village life. The recreation ground and the parish allotments are protected from being lost by their designation elsewhere in the Plan as Local Green Spaces.
- 8.7** Opportunities for the provision of new or replacement facilities to serve the residents of Freckenham will be supported. Opportunities for such provision within the Housing Settlement Boundaries are limited and, where it can be demonstrated that such opportunities do not exist or are un-available, sites should be sought in locations adjoining or in close proximity to the Boundary and facilitate the ability for residents to access them on foot.

Policy FRE 14 - Community Facilities

The provision and enhancement of community facilities and services that serve the needs of Freckenham will be supported where:

- i. they are located on sites accessible on foot and within or in close proximity to the Housing Settlement Boundary;
- ii. they contribute to the quality of village life and improve the sustainability of the village;
- iii. there are no other appropriate and existing buildings within the Housing Settlement Boundary that can feasibly be converted for the required purpose(s);
- iv. it will not have a significant adverse impact on nature conservation, biodiversity or geodiversity interests, or upon the character or appearance of the landscape and countryside; and
- v. the benefits of the proposal outweighs the loss of open countryside.

Proposals that will result in the loss of the following existing community facilities:

- Village Hall;
- Recreation Ground;
- The Golden Boar Public House;
- St Andrew's Church;

continued

as identified on the Policies Map will only be permitted where:

- a. it can be demonstrated that the current use is not economically viable nor likely to become viable. Where appropriate, supporting financial evidence should be provided including any efforts to advertise the premises for sale for a minimum of 12 months; and
- b. it can be demonstrated that there is no local demand for the use and that the building/site is not needed for any alternative social, community or leisure use; or
- c. alternative facilities and services are available or replacement provision is made, of at least equivalent standard, in a location that is accessible to the community it serves with good access by public transport or by cycling and walking.

- 8.8** The 2019 Residents' Survey highlighted the desire to establish a village shop. In the current economic climate, it is considered most unlikely that anyone would consider building a standalone shop in the village, even if a site were to be identified. Suggestions at the time included perhaps including it within the Golden Boar or at the Village Hall. Community shops can be a successful model for small villages but they rely on volunteers to help run them.

Community Aspiration 1 - Village Shop

The Parish Council will seek to work with local businesses and the community to establish a shop in the village to meet day-to-day needs of residents.

Farm Diversification

- 8.9** One such initiative might include the conversion of agricultural buildings to a farm shop through the diversification of farming businesses. Under such circumstances it will be important that the nature of the activity is sensitive to the character of the area, with particular emphasis on protecting and enhancing it. Existing buildings should be re-used where possible, and any opportunity should be taken to seek environmental improvements and to improve the appearance of the holding as a whole through appropriate diversification schemes.
- 8.10** Where new buildings are proposed as part of such a diversification scheme, it is important that they reflect the rural and agricultural building styles typically found in the area. It will be particularly essential to have regard to the character of the area identified in the Neighbourhood Plan Landscape Appraisal in respect of whether the proposal can overcome potential landscape impacts through appropriate siting, design and impact mitigation measures.

Policy FRE 15 - Farm Diversification

Applications for new employment uses of redundant traditional farm buildings and other rural buildings will be supported, providing it has been demonstrated that they are no longer viable or needed for farming.

Re-use for community or economic development purposes is preferred, but proposals which would result in unacceptable harm to the rural economy or would adversely affect the landscape character, highways, infrastructure, residential amenity, environment (including national and international designated sites) and landscape character as identified in the Neighbourhood Plan Landscape Appraisal will not be supported.



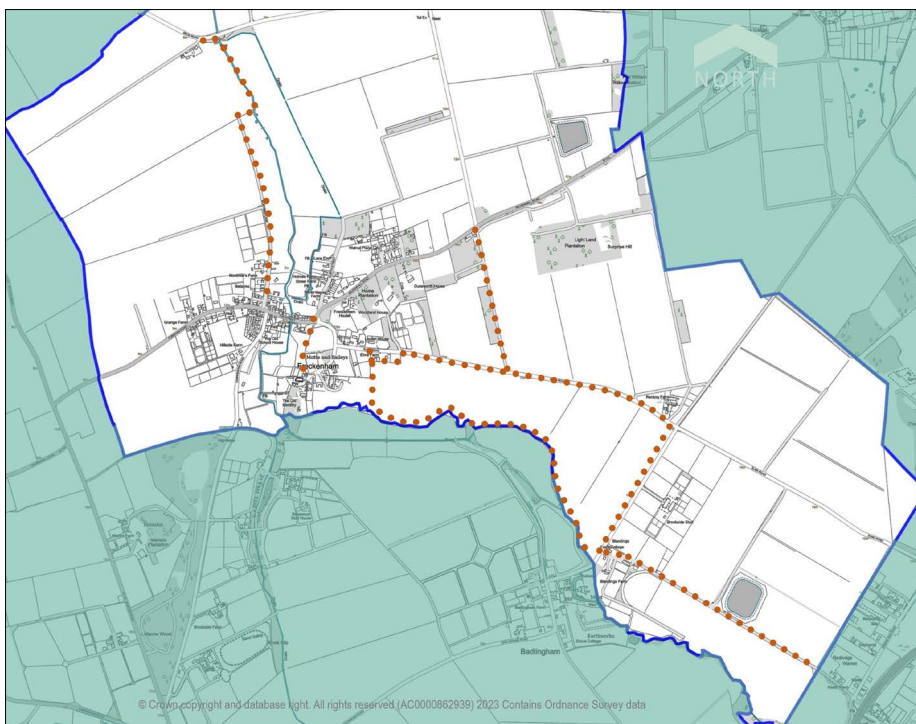
9. Highways and Travel

Objectives

12. **Protect, maintain and improve the Public Rights of Way network.**
13. **Ensure that new development minimises impact on the existing road network.**
14. **Ensure that existing pedestrian routes are maintained and enhanced to improve connectivity in the village.**
15. **Maintain and improve public transport**

Context

- 9.1 Neighbourhood plans have little power to introduce highway improvements as most schemes will not require planning permission. Improvements are therefore reliant on Suffolk County Council, as the highways authority, for investment in projects or improvements required as part of the mitigation of the impact of development proposals.
- 9.2 Freckenham's location on the B1102 means that it experiences high volumes of through traffic travelling between Fordham and Mildenhall and RAF Mildenhall and RAF Lakenheath. In addition, Elms Road provides a direct route to the A11 trunk road.
- 9.3 The village is poorly served by buses, there being just two buses a day Monday to Saturday going to Mildenhall (at 11.03 and 14.03) and two going to Bury St Edmunds (at 9.42 and 12.42). This effectively means there is one return bus to Mildenhall a day (the 11.03) which would allow 1¼ hours in the town and one to Bury St Edmunds (the 9.42) which would allow just over three hours in that town.
- 9.4 Across the village centre, footways are sporadic in their quality and completeness. There is no footway link between Mildenhall Road and The Street; on the northern side of Fordham Road; on Church Lane and for the majority of the length of Elms Road where it serves homes. Footways are also absent in the low trafficked cul-de-sacs of North Street and Mortimer Lane.
- 9.5 There are only a limited amount of public rights of way across the parish, as illustrated on **Map 11**.



Map 11

Map 11 - Public Rights of Way

Residents Survey

- 9.6** The 2019 survey asked what features and facilities were important to residents. The results relating to transport and travel are illustrated in Figure 9.

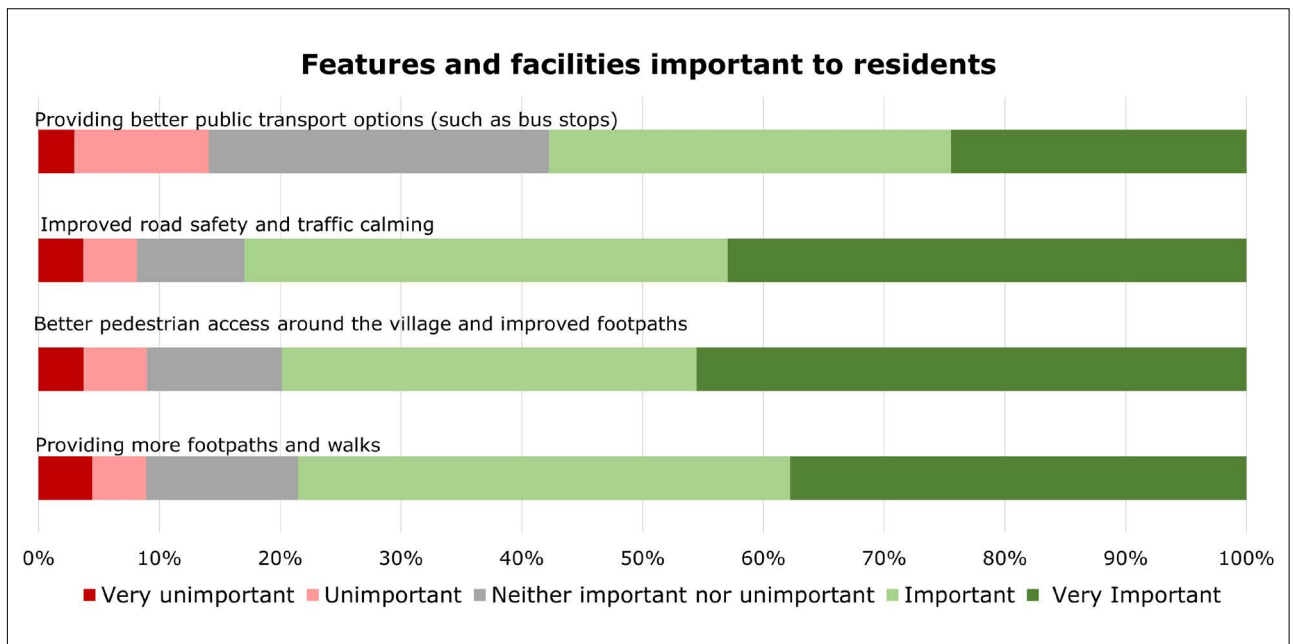


Figure 9 - Features and facilities important to residents (2019 Survey)

Current Planning Policies

- 9.7** The NPPF seeks to promote sustainable transport through reducing the impacts of development on transport networks and promoting walking, cycling and public transport. At a local level, the Forest Heath Core Strategy states that the District Council “will work with partners including Suffolk County Council, the Highways Agency [now Highways England] and developers to secure the necessary transport infrastructure and sustainable transport measures to improve access to services and facilities, particularly in rural areas, and minimise the impact of traffic on the environment.”

Neighbourhood Plan Policies

- 9.8** Because most road improvements can take place within the highway, they do not require planning permission and, as such, the neighbourhood plan is not an appropriate place to contain policies for their improvement. Likewise, the provision of bus services is a decision made outside the planning system. However, although the Parish Council cannot deliver highway improvements, it does have a lobbying role in delivering such measures.
- 9.9** Public rights of way provide opportunities for recreational walking, horse riding and cycling. Where feasible, improvements to the quality and extent of the public rights of way network will be supported where provided as part of development proposals.

Policy FRE 16 - Public Rights of Way

Measures to improve and extend the existing network of public rights of way and bridleways will be supported where their value as biodiversity corridors is safeguarded and any public right of way extension is fit for purpose. Where practicable development proposals should incorporate measures to enhance biodiversity within the improved or extended public right of way.

- 9.10** Feedback from the 2019 Residents' Survey highlighted some interest in establishing more paths for walking, cycling or horse riding. Any additional provision would be reliant upon landowners potentially granting use of paths on a "permissive" basis. It might also be necessary to work with neighbouring parishes where routes would extend beyond Freckenham.

Community Aspiration 2 - Additional Recreational Paths

The Parish Council will seek to work with landowners and, where necessary, neighbouring parish councils, to establish permissive paths for walking, cycling or horse riding to supplement the current network of public rights of way.

- 9.11** Given the lack of bus services in the village, and the tendency towards people living longer in their own homes, it is considered essential that the village should be served by a better bus service. The County Council is responsible for public transport services, including co-ordinating volunteer and community transport initiatives. Therefore, any service provision in Freckenham will need to be approved by them. Currently a rural transport initiative operates in the former Forest Heath area known as "Connecting Communities". It is provided by Suffolk County Council working in partnership with Suffolk Community Transport Operators and is designed to help people travel around the county of Suffolk who may not have access to a regular bus service. The continued support of this services is considered essential for the wellbeing of Freckenham residents without access to a car.

Traffic and Road Safety

- 9.12** Residents highlighted a number of issues and concerns relating to traffic and getting around the village during the preparation of the Neighbourhood Plan. In particular, the main concerns were:
- The lack of footways on many of the roads, especially along Mildenhall Road east of North Street and in the Elms Road / Church Lane area;
 - The volume and speed of traffic passing through the village, which is likely to be exacerbated by construction vehicles should the Sunnica Solar Farm go ahead.
- 9.13** Although the Parish Council, as authors of this Plan. Have no responsibilities in relation to the highways, it does have a lobbying role on behalf of the community. The B1102 is restricted to 30mph through the village and a Speed Indicator Device is located at the western entrance to the village. Over the last ten years there have been a number of slight injury road traffic incidents in the village centre and one serious injury incident. Unlike neighbouring Fordham, however, there are no traffic calming measures in place to help physically reduce speeds. It is understood that Cambridgeshire Highways Department takes a differing view on traffic calming measures on 'B' roads than Suffolk and the reasoning behind this needs to be explored and challenged.
- 9.14** Elms Road is also a busy road providing a short-cut between the A142 at Fordham and the A11 at Red Lodge. It takes the form of a long straight road entering the village from Red Lodge which encourages excessive speeds when entering the built-up area. The verges of the road are also being damaged by the volume and weight of vehicles using the road.

Community Aspiration 3 – Traffic Calming and Speed Reduction Measures

The Parish Council will seek to work with the Suffolk County Council Highways Department to implement traffic calming and speed reduction measures on the B1102 and Elms Road.

- 9.15** Getting around the village safely by foot can be especially challenging in places, especially on Mildenhall Road east of North Street. There is currently no means of walking safely from homes on Mildenhall Road to the village facilities such as the Golden Boar PH, the Parish Church and the Village Hall. If we are to encourage community cohesion and facilitate more journeys by foot, it is imperative that a safe route is provided. As a matter of priority the Parish Council will seek to work with the County Council to resolve this gap in the network and other gaps in footway provision.

Community Aspiration 4 - Improved Footways

The Parish Council will seek to work with the Suffolk County Council Highways Department to provide footways to fill gaps in the network across the village, concentrating initially on Mildenhall Road.

Public Transport

- 9.16 For those without access to a car, either as a driver or passenger, the ability to travel from the village to larger centres for work, shopping, leisure or health appointments is severely curtailed by the lack of bus services. It is accepted that rural bus service provision is a problem nationally but, given the aging population and a desire to encourage travel by more sustainable means, opportunities must be taken whenever possible to improve access to transport.

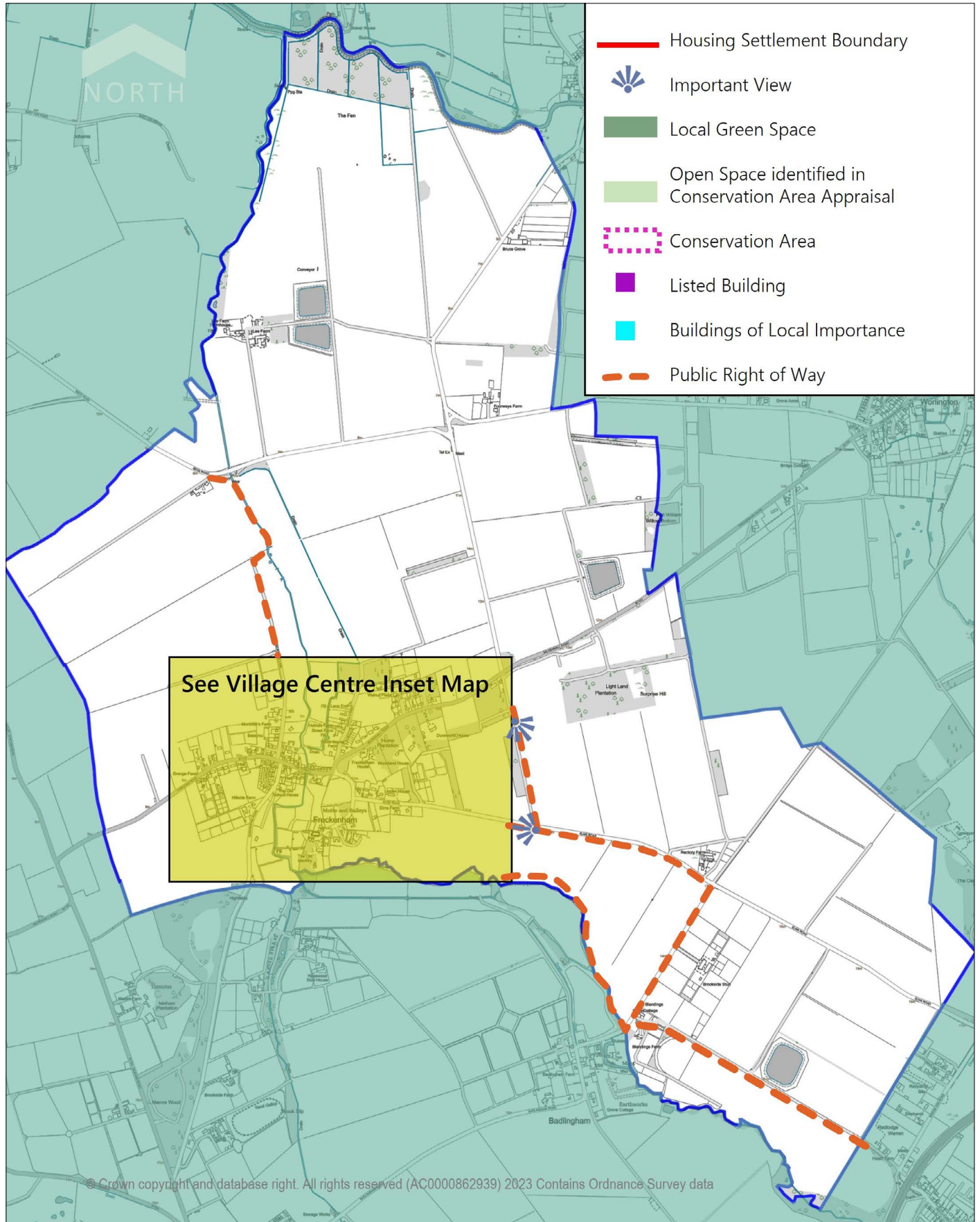
Community Aspiration 5 - Public Transport

The Parish Council will seek to work with the Suffolk County Council, transport providers and community organisations to provide greater access to public and community transport for the residents of Freckenham.

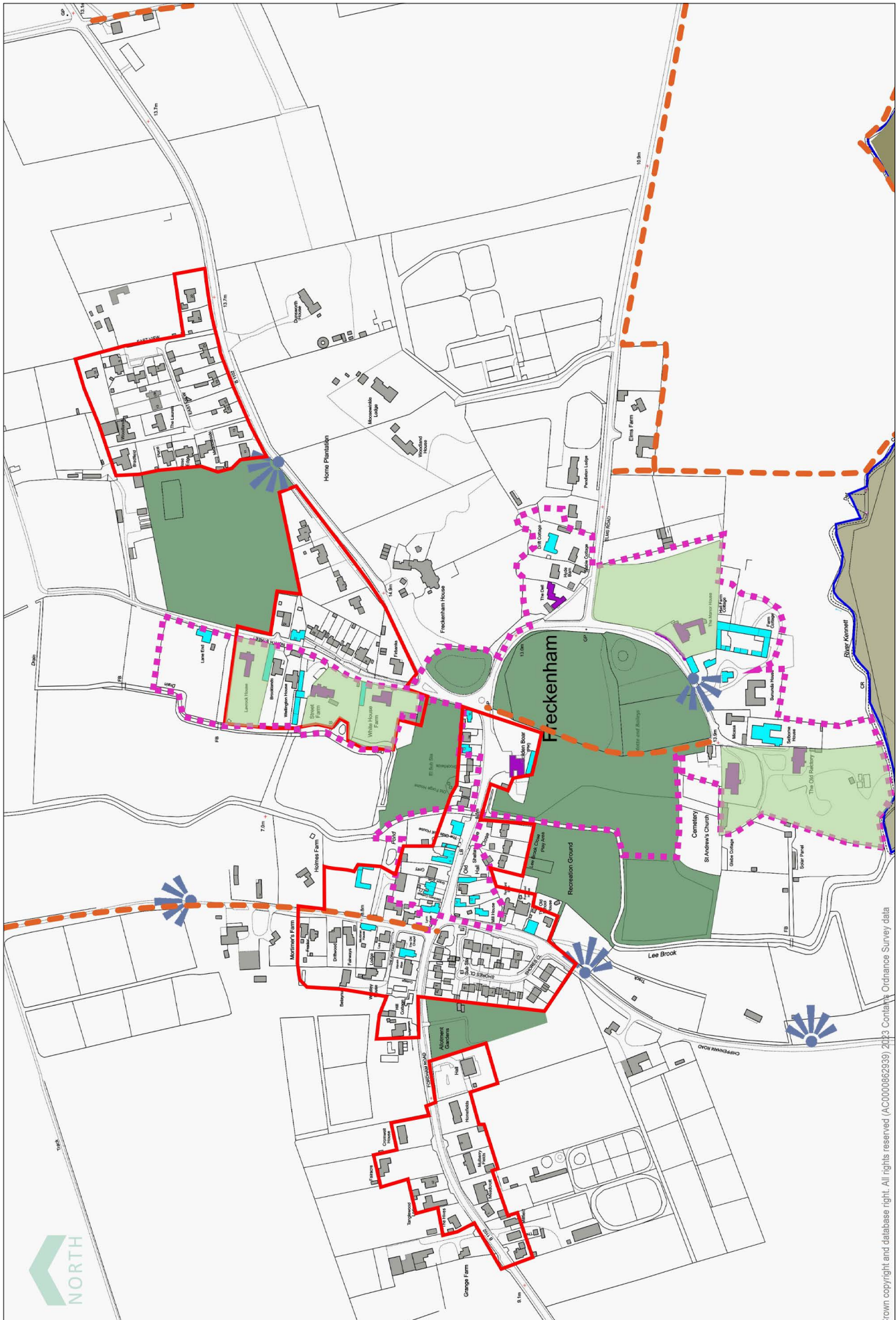




Policies Map

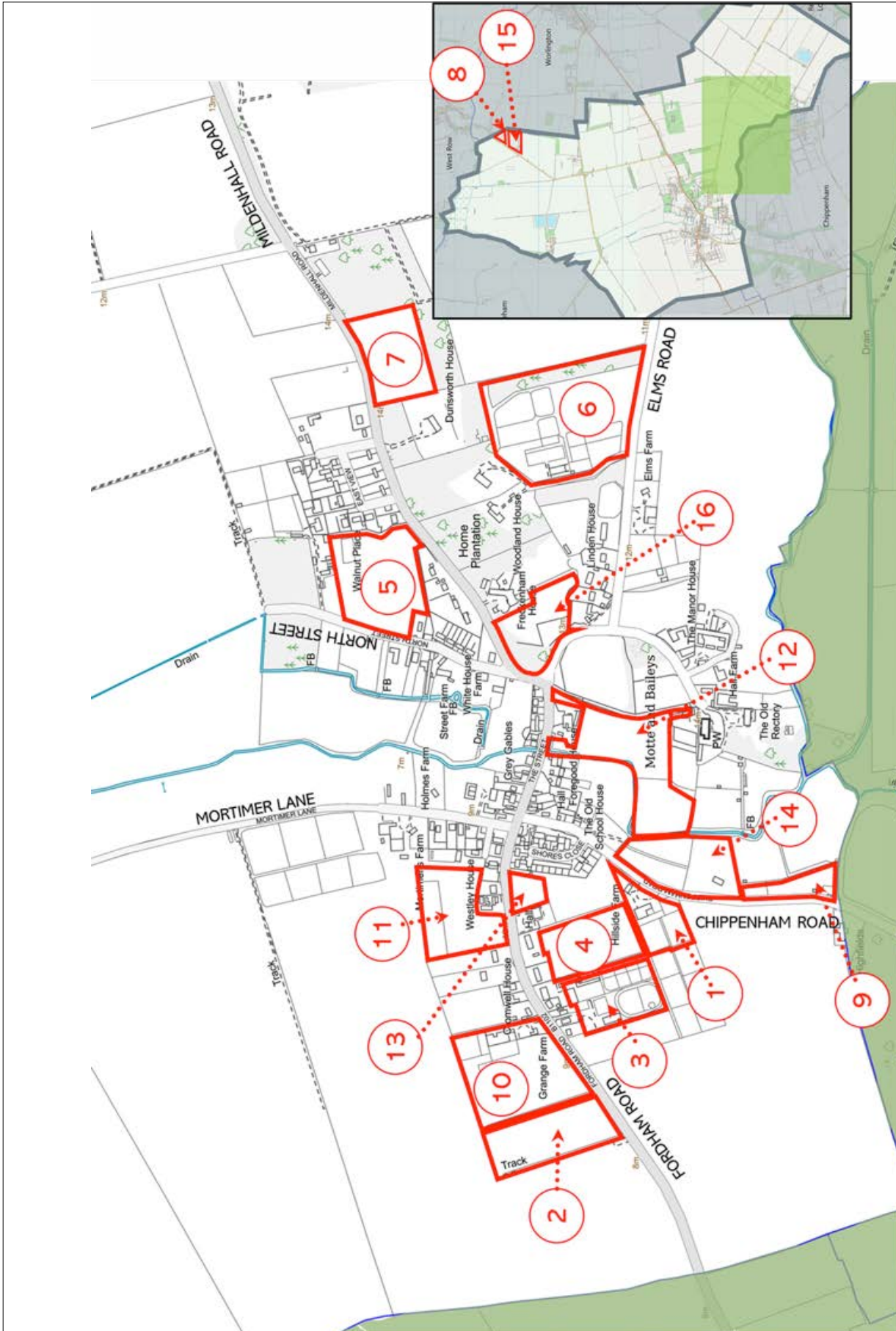


Village Centre Inset Map



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Appendix 1 - Housing Sites Assessed during preparation of the Plan



Where a one bedroom, one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39 square metres to 37 square metres, as shown bracketed.

Appendix 2 - Nationally Described Space Standards

The Government's spaces standards for new homes was published in 2015 and can be found here https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1012976/160519_Nationally_Described_Space_Standard.pdf

The current standard requires that:

- a. the dwelling provides at least the gross internal floor area and built-in storage area set out in the table below;
- b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom;
- c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5 sq m and is at least 2.15 m wide;
- d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5 sq m;
- e. one double (or twin bedroom) is at least 2.75 m wide and every other double (or twin) bedroom is at least 2.55 m wide;
- f. any area with a headroom of less than 1.5 m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m² within the Gross Internal Area);
- g. any other area that is used solely for storage and has a headroom of 900 - 1500 mm (such as under eaves) is counted at 50 per cent of its floor area, and any area lower than 900 mm is not counted at all;
- h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72 sq m in a double bedroom and 0.36 sq m in a single bedroom counts towards the built-in storage requirement; and
- i. the minimum floor to ceiling height is 2.3 sq m for at least 75 per cent of the Gross Internal Area.

A summary table is provided below.

Number of bedrooms (b)	Number of bed spaces per person	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built in Storage
1b	1p	39 (37)			1.0
2b	2p	50	58		1.5
	3p	61	70		2.0
3b	4p	70	79		2.5
	4p	74	84	90	
4b	5p	86	93	99	3.0
	6p	95	102	108	
	5p	90	97	103	
5b	6p	99	106	112	3.5
	7p	108	115	121	
	8p	117	124	130	
	6p	103	110	116	
6b	7p	112	119	125	4.0
	8p	121	128	134	
	7p	116	123	129	
	8p	125	132	138	

Appendix 3 - Priority Habitats in Freckenham Parish



Appendix 4 - Buildings that positively contribute to the character of the conservation area

Source: Freckenham Conservation Area Appraisal (2010)

Not all buildings identified in the Conservation Area Appraisal as positively contributing to the character of the area are described in the Appraisal's appendix, which is reproduced here.

Building Name/ No	Status	Age	Height	Wall Materials	Roof form/ material	Notes
Hall Farm buildings 1	PC & listable	C19	2 storeys	flint & gault brick	Gabled slate	arranged around 4 sides of a yard
Hall Farm buildings 2	PC & listable	C18	1 storey	Black weather-board and red brick	Corrugated iron	
Manor House Barn 3	PC & listable	C17	2 storeys	clunch & red brick	gabled plain tiles	by the road
Drift Cottage		C18 of later	1½ storey	Colour washed render	Shingles	Attractive vernacular form with dormers
22 North Street	PC	C19	1 storey	Rendered	Hipped slate	Not in CA
Barn south of Lavrock House	Curtilage and PC	C1830	2 storeys	Stuccoed walls	Hipped slate	Gault brick boundary wall. Weathervane on barn
Barn East of Wellington House	PC	C19	1 storey	Flint rubble	Gabled pantiles	
Shelter Sheds, Stables, North of White House Farm	Curtilage and PC	Early C19	1 storey	Gault Bricks	Hipped Slate	Cart shed and stable
Lane End	PC	C19	2 storey	Rendered brick	Concrete interlocking tiles	Crumbling clunch boundary wall
Barn - Lane End	PC	C19	1 storey	Clunch	Gabled pantiles	

Appendix 5 - Designated Heritage Assets

As at July 2023

Source - As described on Historic England's Register of Listed Buildings

<https://historicengland.org.uk/listing/the-list/>

Grade II*

Church of St Andrew
Manor House, Church Lane

Grade II

Entrance gates and railings and terminal piers, 15 metres north of Manor House, Church Lane
The Old Rectory, Church Lane
The Dell, Elms Road
Street Farmhouse, North Street
Whitehouse Farmhouse, North Street
Lavrock House, North Street
The Golden Boar Public House, The Street
War Memorial

Scheduled Monument

Freckenham Castle (remains of)

Appendix 6 - Development Design Principles

Not all items in the Development Management Checklist will be appropriate to every planning application. The checklist should therefore be applied accordingly, taking into consideration the proposal, its scale and location.

Existing Context: Understanding Freckenham

- 1 Has the landscape of the existing site and setting been understood and explained through plans, sections and three-dimensional drawings?
- 2 Are there diagrams and plans of the site and its wider area that identify key destinations and focal points?
- 3 Are there diagrams explaining the sites connection with public transport, walking and cycling routes to destinations in the local and wider area?
- 4 Has the scale, detail and materials of adjacent and locally distinctive buildings been analysed and explained through photographs, 3D models and drawings and sketches?
- 5 Have designers looked at the social, cultural history and building traditions of the local area?
- 6 Have the designers looked at the demographics of the local area?
- 7 Have designers engaged with residents and presented their concerns and needs in a clear and transparent way?

Strategic Approach	Design Codes
8 Does the massing and orientation of buildings and their plots make the most of natural daylight and ventilation?	SA. 1
9 Have 3D models, plans and sections been produced to show how the layout of buildings and spaces respond to their landscape setting?	SA. 1
10 Is there a landscape strategy showing the preservation and enhancement of existing landscape features and wildlife habitats?	SA. 2
11 Does the landscape strategy show the location and character of new green spaces, play spaces and street furniture?	SA. 2
12 Have 3D models, plans and sections been produced to show how the layout of buildings and spaces respond to existing buildings and sensitive boundaries?	SA. 3
13 Are key destinations and focal points within the site and the wider area identified in the proposed site plan?	SA. 3
14 Have safe and convenient walking and cycling routes between destinations within the site been identified on the proposed site plan?	SA. 2, SA. 3
15 Do new routes make logical connections to those that already exist in the wider area?	SA. 2, SA. 3
16 Has the character of the key spaces been clearly explained through sketch views from an 'on the ground' perspective?	SA. 2, SA. 3
Streets and Spaces	
17 Is there a landscape strategy proposing contextual surfaces, planting, public realm furniture and lighting?	SS. 2, SS. 3, SS. 4
18 Has the landscape strategy been thought through and fully integrated into the architecture and wider landscape?	SS. 1, SS. 2, SS. 3

19	Have vistas and street views been prepared that show clearly defined focal points?	SS. 1
20	Do the widths of spaces and heights of fronting buildings create intentional scale and character to outdoor spaces that is contextual to Freckenham?	SS. 1, SS. 4
21	Have the designers described the sequence of arrival from the entrance of the site to the front door of the home?	SS. 1, SS. 4
Sustainable Homes		
22	Has the detailed design of each home been considered according to its location within the wider masterplan?	SH. 1, SH. 2
23	Do fenestration details, material choices and built features reflect the characteristics of local buildings?	SH. 1, SH. 2
24	Does the overall design incorporate 'breathing space' for threshold planting, a front garden spaces and/or a porch area?	SH. 2
25	Have entrances and front doors been considered to balance passive surveillance with privacy?	SH. 2
26	Have front gardens, window boxes and hanging baskets been included so that residents can make their mark?	SH. 2
27	Are there diagrams showing overlooking of entrances and circulation spaces from homes?	SH. 2
28	Have sustainable building forms, construction methods and materials been used?	SH. 1
29	Do homes take advantage of renewable energy, including PVs and energy storage?	SH. 1

Glossary

Affordable Housing: Affordable Housing is defined by the Government in the NPPF as:

Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) Affordable housing for rent meets all of the following conditions:** (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- b) Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c) Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) Other affordable routes to home ownership:** are housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement."

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.

Biodiversity: Describes the range and variety of living organisms within an ecosystem. It can include all living organisms, plants, animals, fungi, and bacteria and is often used to indicate the richness or number of species in an area. Such an area can be defined at diverse levels across the globe or be limited to a local area such as a parish.

Biodiversity Action Plan: A strategy prepared for a local area aimed at conserving and enhancing both botanical and biological diversity.

Community Facilities: For the purposes of this Plan, these are defined as meeting places, places of worship, recreation and play areas.

Conservation (for heritage policy): The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance and viability in the future.

Development Plan: This includes adopted Local Plans and neighbourhood plans as defined in section 38 of the Planning and Compulsory Purchase Act 2004.

Habitat: The natural home of an animal or plant often designated as an area of nature conservation interest.

Heritage asset: A term that includes designated heritage assets (e.g., listed buildings, world heritage sites, conservation areas, scheduled monuments, protected wreck sites, registered parks and gardens and battlefields) and non-designated assets identified by the local planning authority. Non-designated heritage assets include sites of archaeological interest, buildings, structures or features of local heritage interest listed by, or fulfilling criteria for listing by, the local planning authority. (Including Local Listing and assets identified in the Special Character Areas).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Infrastructure: The basic physical and organisational structures and facilities (e.g., buildings, roads, and power supplies) necessary for development to take place.

International, national, and locally designated sites of importance for biodiversity: All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

Local planning authority: The public authority whose duty it is to carry out specific planning functions for a particular area which in this case is West Suffolk Council.

Local Plan: The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community.

Neighbourhood plan: A plan prepared by a parish council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Priority Habitats: are those which have been deemed to be of principal importance for the purpose of conserving biodiversity, being listed in the UK Biodiversity Action Plan, and with maintenance and restoration of these habitats being promoted through agri-environment schemes.

Public Rights of Way: A public right of way is a right by which the public can pass along linear routes over land at all times. Although the land may be owned by a private individual, the public have a legal right across that land along a specific route. Public rights of way are all highways in law, but the term 'public rights of way' is generally used to cover more minor highways. Footpath: A footpath is a highway over which the public has a right of way on foot only. Bridleway: A bridleway is a highway over which the public has a right of way on foot, horseback and on a pedal cycle (including mountain-bikes). There may also be a right to drive animals along a bridleway. Restricted byway: A restricted byway is a highway over which the public is entitled to travel on foot, horseback and with non-mechanically propelled vehicles (such as pedal cycles and horse-drawn vehicles). There may also be a right to drive animals along a restricted byway.

Renewable and low carbon energy: Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Rural exception sites for affordable housing: Sites for affordable housing development in rural locations where market housing would not normally be acceptable because of planning policy constraints. Homes can be brought forward on these sites only if there is a proven unmet local need for affordable housing and a legal planning agreement is in place to ensure that the homes will always remain affordable, will be for people in housing need and prioritised for those with a strong local connection to the parish.

Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic, or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting and sense of place.

Strategic Environmental Assessment: A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

Use Classes: The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'.

Wildlife corridor: A wildlife corridor is a link of wildlife habitat, generally native vegetation, which joints two or more larger areas of similar wildlife habitat, Corridors are critical for the maintenance of ecological processes including allowing for the movement of animals and the continuation of viable populations of plants and animals.

Freckenham Neighbourhood Plan 2023-2040

**PRE-SUBMISSION DRAFT PLAN
OCTOBER 2023**

