

ALDHAM

NEIGHBOURHOOD PLAN

2018-2036



SUBMISSION PLAN
MAY 2019

Prepared by Aldham Parish Council



This draft Neighbourhood Plan has been prepared by a Working Group formed by Aldham Parish Council with assistance from Places4People Planning Consultancy

CONTENTS



1.	Introduction	4
2.	Aldham in Context	8
3.	Planning Policy Context	11
4.	The Plan	12
5.	Planning Strategy	13
6.	Housing	15
7.	Open Space	21
8.	Mitigating the Impact of Development on Protected Habitats	20
	Policies Map	23
	Appendix 1 Housing Calculation	25
	Glossary	24
	Policies	
	Policy ALD1 – Spatial Strategy	14
	Policy ALD2 – Housing Development	16
	Policy ALD 3 – Land west of Hadleigh Road	17
	Policy ALD 4 – Land north of The Street	18
	Policy ALD 5 – Affordable Housing on Rural Exception Sites	19
	Policy ALD 6 – Local Green Space	21
	Policy ALD 7 – Mitigating the Impact of Development on Protected Habitats	22

1. INTRODUCTION

1.1 The Localism Act 2011 introduced new rights and powers to allow local communities to shape new development in their community by preparing a Neighbourhood Development Plan, which can establish general planning policies for the development and use of land in the neighbourhood. This document is a Neighbourhood Development Plan (the Plan) as defined in the Act and has been prepared by Aldham Parish Council, which is the “qualifying body” as defined by the Localism Act 2011. Preparation of the Plan has been supported by Places4People Planning Consultancy.

1.2 A neighbourhood plan is a community-led planning framework for guiding the future development, regeneration and conservation of an area. It is about the use and development of land and contains a vision statement, aims, planning policies, proposals for improving the area or providing new facilities, or allocation of key sites for specific kinds of development.

1.3 Town and Parish councils are encouraged to produce their own neighbourhood plans enabling local people to have a say in how their neighbourhood grows and develops. In a designated neighbourhood area which contains all or part of the administrative area of a town or parish council, the town or parish council is responsible for neighbourhood planning.

1.4 Paragraph 29 of the National Planning Policy Framework (NPPF) states that “Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”



1.5 This Draft Neighbourhood Plan has been prepared to conform with the strategic planning policies of the current Babergh Local Plan (as at January 2019), while reflecting the aspirations of the local community. Importantly, the Plan has focused on housing matters in the light of the planning policy and housing land situation in Babergh at the time of writing. This is explained further in the Policy Context section of the Plan.

1.6 The Neighbourhood Plan contains planning policies that will, when the Plan is completed, form part of the statutory development plan which will be used for determining planning applications in the parish.

How the Plan has been prepared

1.7 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.

1.8 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.

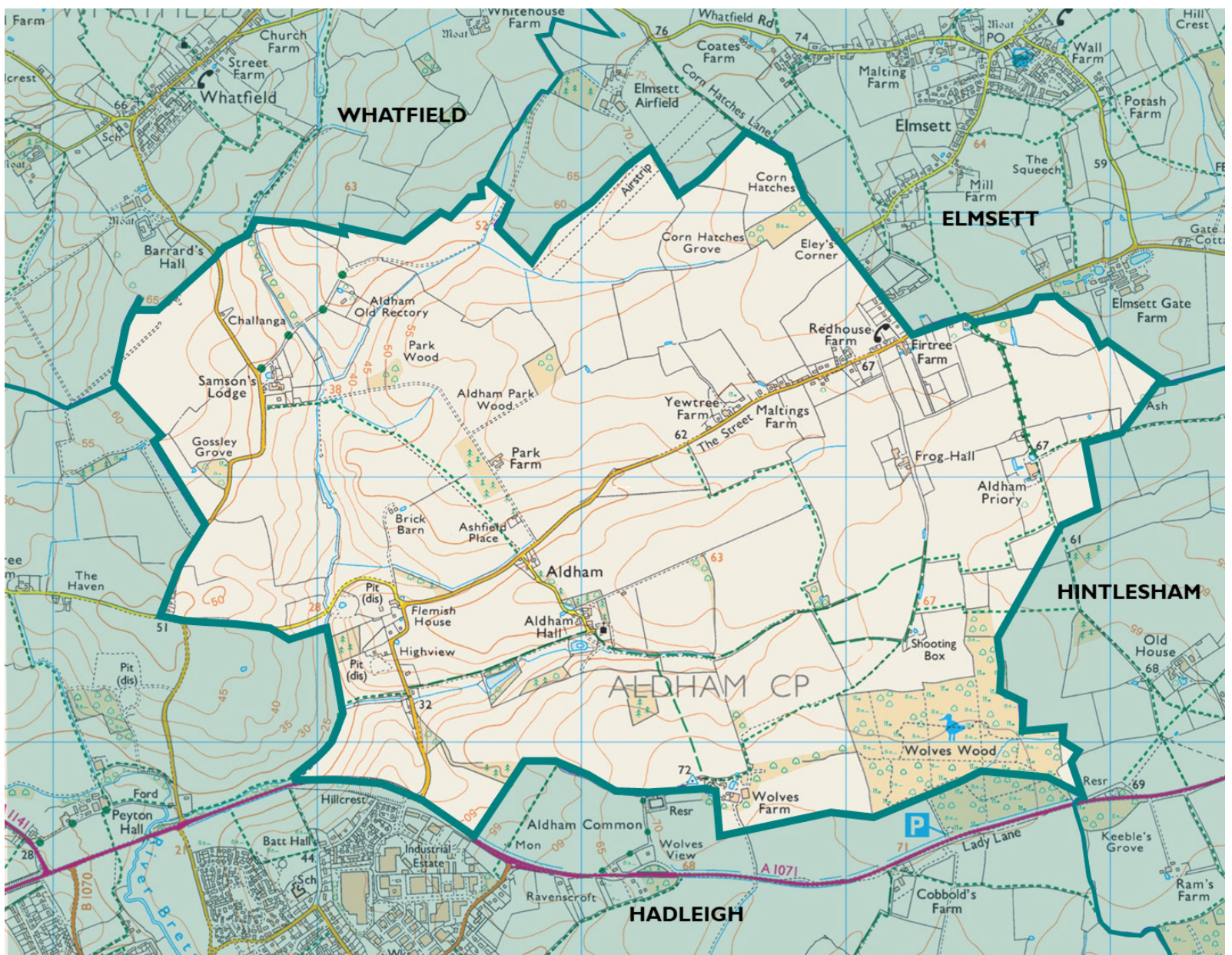
1.9 On 14 June 2018, in accordance with the Neighbourhood Planning Regulations, Babergh District Council formally designated the whole parish as a Neighbourhood Plan Area, as illustrated in Map 1.

Details of the application, publication and designation can be viewed on the District Council's website under Neighbourhood Planning in Aldham. There are no other designated neighbourhood plan areas within this boundary and the Parish Council is the "qualifying body" responsible for the preparation of the neighbourhood plan for this area.

1.10 At the outset of preparing the Neighbourhood Plan, an initial residents drop-in event was held on 18 July 2018 at St Mary's Parish Church, between 4pm and 8pm to share all the information we had at the time about our Neighbourhood

Plan, and to illustrate how important it is that everyone in the parish should feel able to contribute to its evolution prior to eventual submission.

1.11 This document is the "Submission Draft Neighbourhood Plan". It has been submitted to Babergh District Council following the statutory six weeks consultation in between 26 February and 12 April 2019. Amendments have been made to the draft Plan and Babergh District Council will now take it through the final formal stages of the process.



Map 1 - Neighbourhood Plan Area



Photomontage of Display Boards used at July 2018 Drop-in Event

The following list identifies the main comments received at the consultation event

LIKES

- A beautiful hamlet
- The quietness and openness of our surrounding countryside - typically a "hamlet" environment
- A typical English hamlet
- We love the fact that it is friendly, quiet and a lovely place to live.
- The gentle atmosphere of village life - away from the hustle and bustle of everyday busy towns etc (which is why we have stayed for 42 years).
- Suffolk village lifestyle
- We moved to the village because of the rural environment and quietness.
- We do not want to lose what gives the village its character.
- A beautiful hamlet to live in with beautiful countryside surrounding it.
- Open countryside.
- Quiet roads (noticeable when road was closed recently - and the opposite when the A1071 was closed and The Street became a rat-run)
- The peace and quiet and beautiful views.

COMMENTS AND CONCERNS

Housing

- If we have to build new homes, make them more interesting and not all the same.
- If houses are built, how many will be affordable houses? Young people need homes.
- Need for affordable housing with support "facilities".
- *Affordable housing endorsed by one other person*
- If the proposed housing was designated "affordable" I would be much more in favour.
- Affordable homes for young families.
- Affordable new-builds for young and first time buyers
- Affordable housing, including small homes for young people and the elderly.
- Affordable housing (to be) at least half of any proposed new houses.
- The number of affordable houses so that young people brought up in the village have a chance to stay.
- Any new housing should include a reasonable % of affordable housing.

Development

- Keep all future development "sustainable"
- Where possible we should encourage "infill" rather than extending the boundary of the village *endorsed by two other respondents.*
- We should try to avoid villages joining each other

- The village should remain linear - avoid a balloon estate *endorsed by one other person.*
- Planning permission should view positively any applications for annexes for elderly parents, so families can be encouraged to move into or stay within the village *endorsed by one other person.*
- Our plan needs to take into account (existing and proposed) development in Elmsett as this will directly affect our village because of the road problems we already have.
- Access should be considered - (currently we have a lot of) single track roads *one person disagreed.*
- House design should be interesting, individual, mixture, Suffolk hamlet idiosyncratic.

Traffic

- Smiley Face speed sensor (needed) comment *endorsed by two other respondents*
- Speed limit through the village.
- Speed limit should be reduced at Aldham Tye *endorsed by one other respondent.*
- Speed control (needed)
- We need speed control in the village.
- Some sort of speed bumps *endorsed by one other, but two respondents disagreed.*
- Red Hill speed limit reduced to 30mph *endorsed by one other, but two respondents disagreed.*
- Red Hill road to be included in

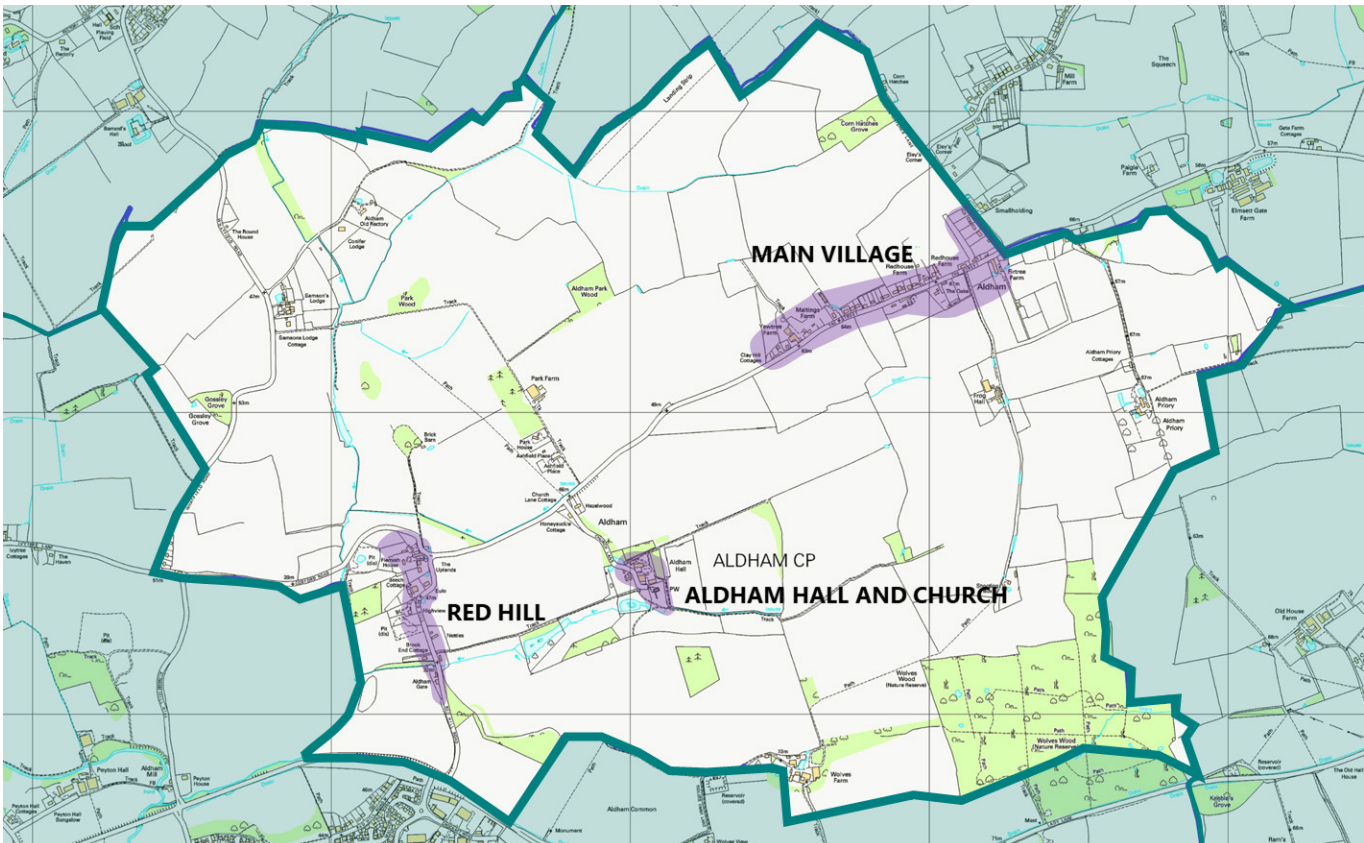
- speed restriction zone.
- Speed control, but not speed bumps *endorsed by two other people.*
- Speed limit throughout the parish *endorsed by one other person.*
- Enforced speed limit.

Community

- Community pub or something of that nature
- If more housing, need to improve (existing) local facilities like the Recycling Site which is too small to cope (even) now with Hadleigh and surrounding villages.



2. ALDHAM IN CONTEXT



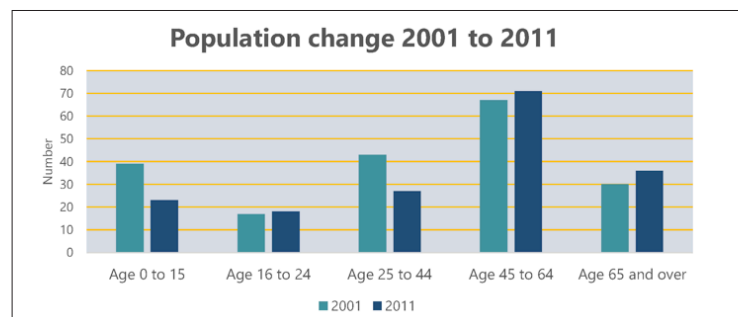
Map 2 - Main Built-Up Clusters

2.1 The main built-up area of the village is primarily focused as a ribbon along The Street, a minor road without footways or street lighting and reflecting the relatively remote rural nature of Aldham. Elsewhere in the parish there are small groups of dwellings often clustered around historic farms. The most significant group is the cluster at Red Hill and around the junction with Cosford Road, as illustrated on map 2. There is also a small but historically significant cluster around Aldham Hall and The Parish Church.

Population

2.2 Aldham is one of the smallest villages in the Babergh district. In 2011 the Census recorded that the village had a population of 175, a decrease of

10% compared with the 2001 Census population. The nature of these changes is illustrated in the population change chart below and indicate a significant drop in the number of children in the village and a small





increase in the number of residents aged 65 and over. The general split of the population across different age categories is generally similar across small villages in Babergh, with a trend towards an ageing population.

2.3 The 2011 Census identified that there were 75 homes in the parish, one less than in 2001. Of the 75, nearly half were larger homes having four or more bedrooms while only ten per cent have two bedrooms, a much smaller proportion than villages of a similar population. Two new homes had been completed in the village between 2001 and 2018 and a further barn conversion at Frog Hall had been

granted planning permission but has yet to be completed.

2.4 In 2011 just over 90 residents in the village were in employment. The average distance people travelled to work at the time was 12 miles, although nearly 14% worked from home.

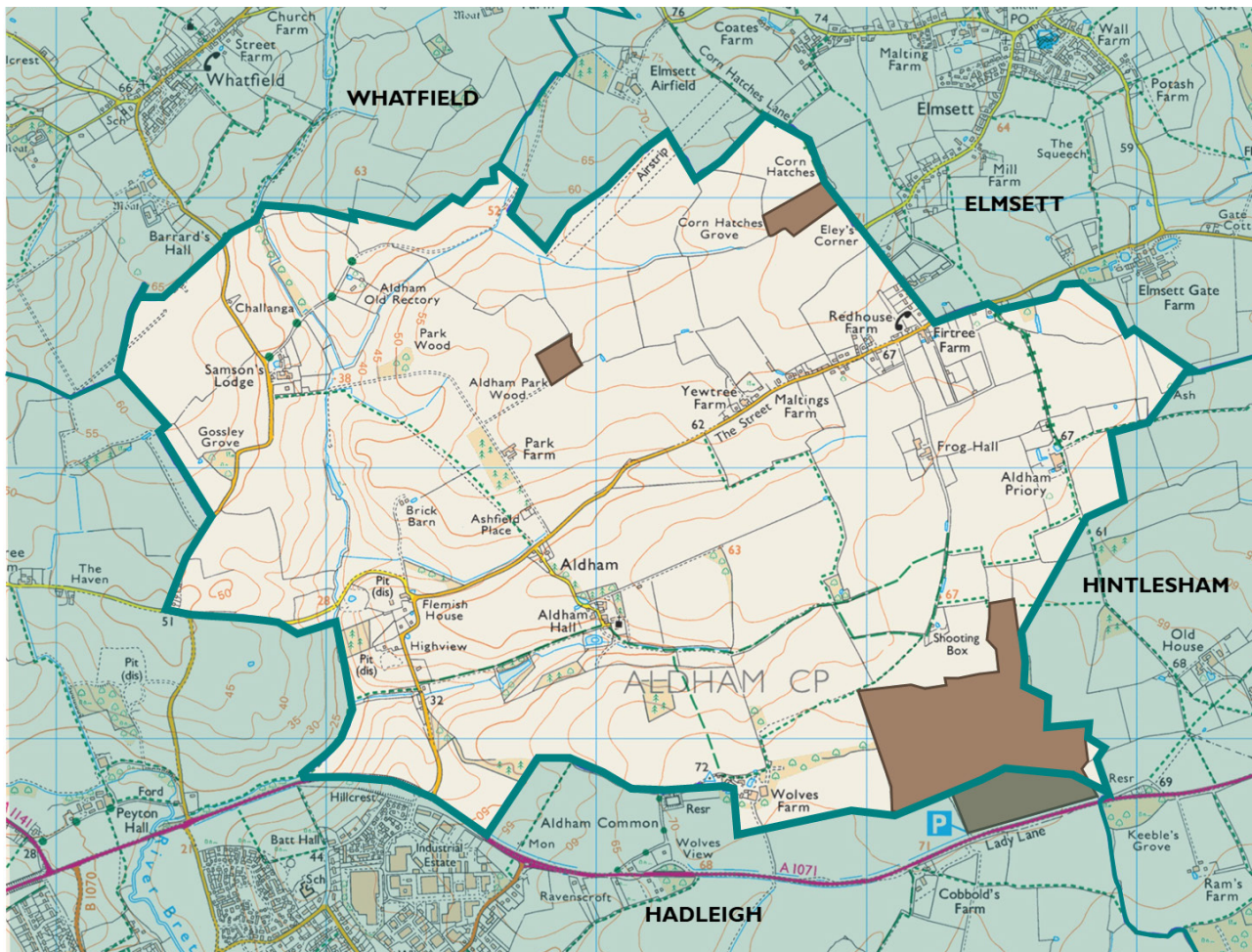
Landscape and Natural Environment

2.5 The central and eastern part of the Plan Area is located relatively high on a plateau with extensive views across the surrounding countryside. The western end is dominated by the steep valley sides of a tributary to the

River Brett.

2.6 Wolves Wood, on the southern boundary of the village, is a Royal Society for the Protection of Birds (RSPB) reserve. It is one of the few remnants of the ancient woodland which used to cover East Anglia. Records show that there has been woodland here since at least the 1600s and it is designated as a Site of Special Scientific Interest.

2.7 Elsewhere in the Plan Area there are further remnants of ancient woodland, namely Aldham Park Wood and Corn Hatches Grove as illustrated on the map below.



Map 3 - Ancient Woodland

2.8 Areas in the east and west of the Plan Area are identified in the Babergh Core Strategy (2014) as a Special Landscape Area.

Historic Environment

2.9 There are six Listed Buildings in the Plan Area, the most notable of which is the Grade I Listed Church of St Mary. The Historic England description states that it is a flint church with stone dressings built circa 1340. A circular west tower has a 11th -12th century base. The chancel has a 14th century kingpost roof and there are some 15th century carved benches and a 15th century lectern. The remainder of the Listed Buildings date primarily from the 16th or 17th century as follows:

- Aldham Hall, Church Lane
- Church Lane Cottage, Church Lane
- Flemish House, Red Hill
- Redhill Cottage, Red Hill
- Yew Tree Farmhouse, The Street

There have been a number of archaeological finds in the Neighbourhood Plan Area, including Roman coins and pottery, and Saxon metalwork. 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.



Access to Services and Facilities

2.10 There are no shops or facilities in Aldham and it relies on sharing the use of neighbouring Elmsett's village hall. Elmsett also has a Primary School, Shop, Public House and playing field and is around 1½ miles from main population centre of the village. The larger centre of Hadleigh, with a wide range of shops, services and job opportunities is three miles away via narrow roads without pavements. Residents have raised significant concerns at the amount of traffic using the narrow roads that access Aldham. An additional 70 homes being developed at Elmsett, will result in a large proportion of the new residents driving through Aldham to get to work or to access services and facilities. A Suffolk County Council survey in May 2015 recorded in excess of 1,100 vehicle movements a day along The Street.

2.11 The only public transport that's available to Hadleigh is operated by Hadleigh Community Transport on four days a week, leaving Aldham after 9.00am and returning at lunchtime. The Community Transport initiative also operates a bus to Ipswich on a Thursday, leaving from near the Hadleigh Road / Street junction mid-morning and returning at 1.00pm from Ipswich.

2.12 At the time of the preparation of the Neighbourhood Plan, broadband speeds in the village were slow and further contributes to the sense of rural isolation experienced by residents.

3. PLANNING POLICY CONTEXT

3.1 The regulations governing the preparation of Neighbourhood Plans require that they conform with the NPPF and the strategic policies of the local development plan. In July 2018 the Government published a Revised NPPF.

3.2 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.
- Plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.

3.3 At a more local level, the Plan has been prepared in the context of the current status of the Babergh Local Plan, which comprises the Core Strategy and the “saved policies” of the 2006 Babergh Local Plan. Babergh District Council adopted a Core Strategy in February 2014. It provides the current strategic planning framework for Aldham which this Neighbourhood Plan has had regard to. These documents are collectively referred to as “the local plan” in this document. In 2015 Babergh District Council announced their intention to produce a new Joint Local Plan (the emerging local plan) with Mid Suffolk District Council that would provide a planning framework for the management of growth across the two districts to 2036. In August 2017 a consultation document was published but as of January 2019 a draft Local Plan had yet to be published for consultation. It is considered unlikely

that the emerging local plan will be adopted before the Neighbourhood Plan is “made” by the District Council. As such, the Neighbourhood Plan has been prepared to conform with the policies in the adopted local plan documents, while having regard to the status and content of the emerging local plan.

3.4 The adopted Core Strategy identifies a hierarchy of settlements ranked according to their size and the services they provide. The Core Strategy recognises that there are several larger villages (core villages) that provide a range of services and facilities for a cluster of villages around them. It identifies Aldham as a “hinterland village” within the “functional cluster” of Hadleigh, acknowledging that Hadleigh provides a range of services and facilities to meet many of the needs of Aldham’s residents, albeit that the only realistic way to get to Hadleigh is by car. In so far as Aldham is concerned, the saved policies of the 2006 Local Plan and the policies in the Core Strategy are those by which planning applications will be judged until replaced by a new local plan.

3.5 In 2015 the District Council commenced the preparation of a new joint local plan in conjunction with Mid Suffolk. The August 2017 consultation document identified issues for the Plan to address and put forward options. The document:

- proposed maintaining Aldham’s status as a hinterland village (but it should be noted that this designation is currently being challenged by the Parish Council given the total lack of any services and facilities in

Aldham when measured against the District Council’s Scoring Criteria for settlements);

- proposed the retention of the existing Built-Up Area Boundary as identified in the 2006 Plan; and
- identified a potential site for housing development that could be allocated in the Joint Local Plan.

Given the lack of services, poor road links and lack of public transport, it is considered that the village should be designated in the “Hamlet and Countryside” category.

3.6 The Joint Local Plan will run to 2036 and the 2017 consultation suggested that the required housing growth rate across Babergh would be around 15% higher than the rate planned for in the 2014 Core Strategy. At this time the joint local plan is at a very early stage of preparation and, therefore, is not a matter that has been given weight in the preparation of this Neighbourhood Plan. However, the District Council has stated in the consultation document that it will be seeking to minimise any conflicts between policies in neighbourhood plans and the emerging Local Plan.

3.7 Given the status of the Joint Local Plan and the fact that the Neighbourhood Plan will be completed before the Local Plan is adopted, regard has been had to the adopted Babergh development plan documents in preparing this Plan while not seeking to contradict the emerging strategic policies of the Joint Local Plan.

4. THE PLAN

4.1 The Plan has been prepared to focus purely on housing development. This is because of the situation at the time in Babergh where there is no site allocations local plan document and an adopted Core Strategy that is four years old without a prospect of a new local plan being in place until the end of 2020 at the earliest. In the meantime, although the District Council's Annual Monitoring Report 2017/18 identified a five years housing land supply, we feel that this is a fragile situation and could leave the Neighbourhood Plan Area vulnerable to speculative and unplanned housing development.

Sustainable Development

4.2 There is no legal requirement for a Neighbourhood Plan to be accompanied by a sustainability appraisal. However, those preparing the plan must demonstrate how it contributes to achieving sustainable development. The National Planning Policy Framework states that achieving sustainable development "means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways"

The NPFF objectives are:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation

and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.



4.3 In some limited circumstances, where a Neighbourhood Plan is likely to have significant environmental impacts, it may require a strategic environmental assessment. Draft Neighbourhood Plan proposals are therefore assessed to determine whether the plan is likely to have significant environmental impacts. Babergh District Council is managing this process as part of their duty to support the preparation of Neighbourhood Plans. A screening opinion of the draft Plan is being undertaken to assess whether a Strategic Environmental Assessment and/or a Habitats Regulations Assessment of the Plan will be required.

5. PLANNING STRATEGY

5.1 As noted above, the planning policy framework for Babergh is currently evolving from that which is set out in the Core Strategy (2014) to a new Joint Local Plan for Babergh and Mid Suffolk districts. The Joint Local Plan is at such an early stage that there is no specific content or policy guidance by which the Neighbourhood Plan can be prepared. The initial consultation on options for the Local Plan, undertaken in August 2017, designated Aldham as a Hinterland Village. However, this proposed designation is being challenged by the Parish Council as it is considered that, given the non-existent services in the village and its poor access to other, higher order settlements, Aldham should be designated as a "Hamlet" in the Joint Local Plan. The Neighbourhood Plan has been prepared ahead of the Joint Local Plan being adopted and therefore the Core Strategy and saved policies of the 2006 Local Plan remain the district planning policies, along with the NPPF.

5.2 Core Strategy Policy CS2 designates Aldham as a Hinterland Village which will: "accommodate some development to meet the needs within them" and where "All proposals will be assessed against Policy CS11."

5.3 Core Strategy Policy CS11 has three key strands to it that are relevant to setting the policy context to the Aldham Neighbourhood Plan. In summary, it states that development proposals will be approved where:

- i. proposals score positively when assessed against Policy CS15;
- ii. a series of matters identified in the policy are addressed; and
- iii. proposals are able to demonstrate a close functional relationship to the existing settlement sites. The sites identified for development in this Neighbourhood Plan satisfy these criteria.

5.4 A central principle of the Neighbourhood Plan is to support only limited development in Aldham that:

- is consistent with its lack of services and facilities;
- takes account of the very narrow access roads to larger centres; and
- ensures that it will not have an irreversible impact on the characteristics of this small and remote village.

Aldham has been in receipt of a very limited amount of development in previous years and a continuation of this approach will ensure that the essential and distinct characteristics of the village are maintained. It is, however, essential that the growth is focused on the existing main built-up area of the village in order to avoid sporadic and isolated development that would be detrimental to the rural nature of the area.

5.5 A Built-Up Area Boundary (BUAB) is defined for the main built-up area of the village in order to manage the location of future development and limit unjustified development outside the boundary. The boundary is based on that contained in the 2006 Local Plan but has been reviewed to reflect recent changes and opportunities for new development that will arise during the Neighbourhood Plan period. In order to manage the potential impacts of growth, new development will be focused within the BUAB. This will ensure that the undeveloped rural countryside is preserved and remains largely undeveloped.

5.6 Policy CS11 of the Babergh Core Strategy allows, subject to certain considerations, limited growth to take place adjoining but outside the BUAB. This was the case when the District council approved seven dwellings on Hadleigh Road despite the Parish council objections. However, given the lack of services and facilities in the village, and the fact that this Plan sets out how it meets the identified housing needs in full (as referred to in Paragraph 97 of the Government's Planning Practice Guidance) there will be no local identified need for further housing development outside the BUAB other than allowed for in this Plan.

5.7 Such development would only reinforce the ribbon nature of the village by extending the housing along the roads and would have a detrimental impact on the nature and form of the settlement. It could also

erode the small but important gap that separates Aldham and Elmsett villages. There may be situations where it can be demonstrated that it is necessary for development to take place away from the BUAB, but this will be limited to that which can satisfactorily demonstrate that there is an identified local need for the proposal and that it cannot be satisfactorily located within the BUAB. However, this approach does not restrict the conversion of agricultural buildings to new uses where proposals meet the government regulations and local planning policies for such conversions.

Policy ALD1 – Spatial Strategy

The Neighbourhood Plan area will accommodate development commensurate with Aldham's designation of a Hinterland Village. The focus for new development will be within the defined Built-Up Area Boundary, as defined on the Policies Map.

Proposals for development located outside the Built-Up Area Boundary (BUAB) or will only be permitted where it can be satisfactorily demonstrated that there is an identified local need for the proposal and that it cannot be satisfactorily located within the BUAB.



6. HOUSING

6.1 A key role of the Neighbourhood Plan is to identify the amount of new housing to be provided during the period covered by the Plan and to identify where it will be located. In September 2018 the government published revised National Planning Guidance that states that “the ‘policies and allocations’ in the plan should meet the identified housing requirement in full, whether it is derived from the standard methodology for local housing need, the housing figure in the area’s strategic policies, an indicative figure provided by the local authority, or where it has exceptionally been determined by the neighbourhood planning body.” In other words, and without any further guidance being published at this time, there are four options for identifying the “housing requirement”. The following paragraphs provide consideration of the available evidence to identify the current housing requirement for Aldham.

6.2 At the time of preparing this Neighbourhood Plan, the housing figures in the strategic policies are those in the adopted Babergh Core Strategy (2014). A more up-to-date indicative figure has not been provided by Babergh District Council. The Joint Local Plan is at an early stage in its preparation and the numbers identified in the August 2017 cannot be relied upon given that the consultation document was published prior to the government announcing the requirement to use a standard methodology for the calculation.

6.3 The Core Strategy allocated 1,050 new homes to Core and Hinterland villages in the period to 2031. All of these have either already been built or had planning permission at the time of preparing the Neighbourhood Plan. Therefore, the Core Strategy does not require additional allocations in this Neighbourhood Plan to meet its growth strategy to 2031. Furthermore, at 1 April 2018, Babergh District Council could demonstrate a five years supply of housing sites across the district and there was, therefore, no need to identify additional sites to overcome the short-term shortfall.

6.4 However, given the changing circumstances in terms of the local plan and the extended period of the neighbourhood plan, it is appropriate to review the amount of growth that is predicted in Babergh over the Neighbourhood Plan period and the potential for Aldham to contribute an appropriate amount of this growth. Appendix 1 of this Neighbourhood Plan sets out a calculation for the amount of housing required in Aldham in the period to 2036. It uses the Government’s “standard methodology” referred to in the NPPF using the Government’s 2014 Household Projections as requested by the Secretary of State in an announcement in October 2018.

6.5 The calculation suggests that the residual requirement for the Neighbourhood Plan, as at 1 April 2018, is between 3 and 8 homes in the period to 2036. However, given that seven dwellings already have

planning permission in the village and that they are likely to be developed in the short term, it is considered essential to make provision for further housing development over the longer-term life of the Neighbourhood Plan. This Neighbourhood Plan therefore provides for around 15 new homes in the village between 2018 and 2036, including the seven above. The new homes requirement will be delivered through a number of approaches as identified in the following paragraphs.

6.6 Two sites are allocated in this Neighbourhood Plan on sites adjacent to the Local Plan BUAB that are expected to come forward during the period to 2036. They are identified in specific policies (ALD 3 and ALD 4) and on the Policies Map and are expected to deliver 12 homes in total.



6.7 There will continue to be opportunities within the BUAB for small “windfall” sites to come forward as a result of, for example, redevelopment or plot rationalisation. There will continue to be opportunities within the BUAB for small “windfall” sites to come forward as a result of, for example, redevelopment or plot rationalisation. It will, however, be essential that such proposals have regard to the characteristics of the local environment including the presence of designated or non-designated heritage assets, any impact on the amenity of nearby residents and the ability to achieve a safe access onto the highway.

6.8 Outside the BUAB, there will occasionally be opportunities to convert existing buildings, such as barns, to residential use. In some circumstances, planning permission is not required for such conversions, but the schemes do help to contribute to meeting the housing need of the area. Occasionally, works that are required to existing buildings to make them suitable for residential use can have a detrimental impact on the character of the building and its setting within the countryside. The Neighbourhood Plan, while allowing in principle works to convert buildings in the countryside to residential uses, seeks to limit the impact of proposals especially on the setting or significance of listed buildings or any potentially curtilage listed buildings.

6.9 Limited opportunities might exist for single plot infill development within the curtilages of dwellings



Map 4 - Land west of Hadleigh Road Planning Permission

Policy ALD2 – Housing Development

This Plan provides for around 15 dwellings to be developed in the Neighbourhood Plan area between 2018 and 2036. This growth will be met through:

- i) the allocation of sites as identified in separate policies in the Plan and on the Policies Map; and
- ii) small “windfall” sites and infill plots of one or two dwellings within the Built-Up Area Boundary that come forward during the plan period and are not identified in the Plan; and
- iii) conversions and new development opportunities outside the Built-Up Area Boundary in accordance with paragraph 79 of the NPPF.



subject to overcoming any potential impacts on the environment, residents' amenity and demonstrating that the proposal would not result in an isolated dwelling in the countryside as defined by paragraph 79 of the NPPF.

6.10 Combined, and in accordance with the requirements of 97 of the National Planning Guidance, these approaches to the delivery of residential development will meet the identified housing requirement in full.

Land west of Hadleigh Road

6.11 Proposals for a site west of Hadleigh Road (Elmsett Road) were registered with Babergh District Council in March 2018. The scheme consisted of seven detached dwellings and the application form suggested that the development would comprise primarily of four-bedroomed bungalows with two three-bedroomed bungalows. The scheme would, therefore, further exacerbate the shortage of smaller dwellings in the village. Despite objections from the Parish Council, the District Council concluded that "The proposed development is not considered to result in any significant adverse impact on highways safety, residential amenity, heritage assets, the environment or biodiversity interests to warrant refusal." Planning consent was therefore granted on 13 June 2018.

6.12 This Neighbourhood Plan cannot revoke that planning permission and, because it was granted after

Policy ALD 3 – Land west of Hadleigh Road

Land to the west of Hadleigh Road, as identified on the Policies Map, is allocated for seven single storey dwellings as permitted by Babergh District Council in June 2018 (Ref DC/18/00799). Detailed proposals for this site should:

- i) retain the existing trees and hedgerows along the boundaries of the site;
- ii) provide new screen planting of native species on the western boundary;
- iii) where necessary, having regard to the emerging Suffolk Coast Recreational Avoidance and Mitigation Strategy, contribute towards or deliver measures identified through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive; and
- iv) have regard to the setting and significance of the adjacent listed building in order to retain a sense of its existing isolation and relationship to the surrounding rural environment.

1 April 2018, it is therefore allocated in the Plan and contributes towards the housing needs of the village to 2036. The planning permission included a number of matters that the development would need to address, and these are included in Policy ALD 3 to ensure that, should the permission lapse, the matters are addressed in any future relevant applications.

Land north of The Street

6.13 In addition to the allocation west of Hadleigh Road, and in order to ensure that the housing requirement for the period to 2036 is fully met, an additional site is identified for development north of The Street. The site forms part of a much larger one originally submitted to Babergh

District Council as part of a call for sites suitable for potential inclusion in the emerging Joint Local Plan. The larger site was discounted by Babergh for inclusion in the Joint Local Plan because it was too big but in the 2017 Local Plan consultation it was suggested that a smaller site that delivered five dwellings might be suitable.

6.14 Having given careful consideration to the longer-term needs of the village and taking into account the feedback from the community consultation event in July 2018, a site fronting onto The Street is allocated for five dwellings for development no earlier than 2026. This delay is made on the basis that a permission already exists for

seven dwellings at Hadleigh Road (Policy ALD3) and that there is a need to continue the long-term trend of limited and small-scale growth in the village over the lifetime of the Plan through development that is more likely to meet a “proven local need” in accordance with Policy CS11 iii) of the adopted Core Strategy rather than front-load development that cannot satisfy the Core Strategy policy.

6.15 Given the identified need for smaller homes in the village, the development will be limited to dwellings that provide a mix of two and three bedroomed homes. It is also important that a substantial belt of screen planting using native species is delivered at the rear of the site in order to minimise the impact of the development on the countryside.

6.16 As the site lies within 13 kilometres of the Stour and Orwell Estuaries Ramsar site, additional residential development could result in detrimental recreational impacts on the designated site. Suffolk Coast Recreational Avoidance and Mitigation Strategy (Suffolk RAMS) is being prepared by a partnership including Babergh District Council and it may be necessary for proposals on this site to contribute towards or deliver measures through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.

Affordable Housing

6.17 The latest published government figures identify that the



Map 5 - Policy ALD4 Site Concept Plan

Policy ALD 4 – Land north of The Street

A site of approximately 0.3 hectares north of The Street is allocated for a mix of five two and three bedroomed dwellings;

The development will not be permitted to be commenced before 2026.

Detailed proposals for this development should having regard to the Site Concept Plan illustrated on Map 5:

- i) provide new screen planting of native species on the western boundary; and
- ii) where necessary, having regard to the emerging Suffolk Coast Recreational Avoidance and Mitigation Strategy, contribute towards or deliver measures identified through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.

Policy ALD 5 – Affordable Housing on Rural Exception Sites

Proposals for the development of small-scale affordable housing schemes, including entry level homes for purchase (as defined by paragraph 71 of the NPPF) on rural exception sites outside the main village Built-Up Area Boundary, where housing would not normally be permitted by other policies, will be supported where there is a proven local need and provided that the housing:

- i) remains affordable in perpetuity;
- ii) is for people that are in housing need by virtue that they are unable to buy or rent properties in the villages at open-market prices;
- iii) is offered, in the first instance, to people with a demonstrated local connection, as defined by the Babergh Choice Based Lettings Scheme. Where there is no local connection, a property should then be offered to those with a demonstrated need for affordable housing in neighbouring villages.

These restrictions should be delivered through a legal agreement attached to the planning consent for the housing. Applications for such development will be considered in relation to the appearance and character of the surrounding area, the potential impact on residential amenity and highway safety.

To be acceptable, proposals should demonstrate that a local need exists which cannot be met by applying normal planning policy for the provision of affordable homes in association with market housing. Any application for affordable housing in respect of this policy should be accompanied by a detailed needs assessment and the accommodation proposed should contribute to meeting this proven need.

In exceptional circumstances, a small number of market homes will be permitted where demonstrated that these are financially essential to facilitate the delivery of affordable units.

median house prices in Babergh are 10 times the median gross annual earnings of residents. This is having a huge impact on the ability of people to buy housing, especially those on lower incomes. Affordable housing provides a potential accommodation solution for those that need to live in the villages but are unable to access open market price housing. The adopted Local Plan policy for affordable housing requires new developments on sites of over ten houses to provide up to 35% of the total as housing that meets the “affordable” definition (see Glossary). However, the allocations in this Plan mean that there is no mechanism for delivering affordable housing in the village as part of a larger development.

6.18 One way to provide affordable housing which will meet identified local needs is through granting planning permission on an exceptional basis for affordable housing on land next to but outside the defined Built-Up Area Boundary is. This approach has already delivered a number of homes for local people

in neighbouring Elmsett in the past. Where a “rural exception” site is proposed for development, it must be demonstrated that there is an identified local need in the village and that the site is suitable to meet that local need. A Housing Needs Survey has not been undertaken in preparing the Neighbourhood Plan and it is not considered that, at this time, a substantive need exists that would warrant the provision of an affordable housing scheme to meet local needs in the village.

6.19 It is therefore important to have a policy in place to enable such development to take place. In exceptional circumstances, it may be appropriate to permit an element of open market housing to facilitate the delivery of the affordable housing. This is in accordance with paragraph 77 of the NPPF, which states that local authorities should consider whether this approach would help provide additional affordable housing. The exceptional circumstances, where a small number of market homes will be permitted could include, for example,

where there is insufficient government grant available and it is demonstrated, through financial appraisal, that the open market housing is essential to enable the delivery of the affordable housing. In these cases, the applicant would need to demonstrate, to the satisfaction of the District Council, that the inclusion of open market housing is the minimum necessary to enable the delivery of the affordable housing and is not being developed to generate uplift in land values for the landowner. This could be demonstrated through the provision of affordability/profitability modelling data. Where an element of open market housing is proposed as part of an affordable housing exception site, it should be sympathetic to the form and character of the settlement and in accordance with local needs. Local needs can vary, and it could be that smaller market homes are required to meet the needs of first-time buyers or people wishing to downsize to a smaller home. This would need to be established at the time in consultation with the District Council’s Housing Service.

7. OPEN SPACE

7.1 Paragraph 99 of the NPPF states that “the designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them.” Paragraph 100 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

- local in character and is not an extensive tract of land.
- It is recognised that the designation of Local Green Spaces (LGS) should not be used simply to block development

7.2 Background work undertaken during the preparation of this Neighbourhood Plan has identified one site that qualifies for designation

as Local Green Space, Pump Green on The Street. The area is identified on the map below.

7.3 The table below identifies how the space meets the NPPF criteria.



Map 6 as identified in red on page 23

Local Green Space Assessment

Site Details	
Description and purpose	Green adjoining southern side of The Street
Checklist	
Are there any statutory designations?	Designated Common Land
Is the site designated for any purpose in the Local Plan?	No
Are there any current planning permissions on the site?	No
What is the Site Area?	0.1 hectares
Who owns it?	Parish Council
NPPF Criteria Assessment	
Is it close to the community it services?	Within main built-up area of Aldham
Is there public access?	Yes. Direct access from The Street
Is there any ecological significance?	None known, but hedgerows on southern boundary
Is it historically significant?	Not known
Is it demonstrably special to the local community and hold a particular local significance	The green provides the location for the Parish Noticeboard.
Is it local in character and is not an extensive tract of land (less than 2.5 hectares)?	Yes.
Conclusion: Does the site meet the LGS criteria?	YES - Designate as Local Green Space

Policy ALD6 – Local Green Space

Pump Green, The Street, as identified on the Policies Map, is designated as Local Green Space. Development on this site will only be permitted in exceptional circumstances. Permitted development rights, including the operational requirements of infrastructure providers, are not affected by this designation.

8. MITIGATING THE IMPACT OF DEVELOPMENT ON PROTECTED HABITATS

8.1 Aldham is located within 13 kilometres of the Stour and Orwell Special Protection Area (SPA) and Special Area of Conservation (SAC). Unless mitigated against, Natural England consider that additional residential development within the 13 kilometre “Zone of Influence” could have a detrimental impact on the designations due to an increase in residential trips. An emerging strategic solution, the Suffolk Coast Recreational Avoidance and Mitigation Strategy (Suffolk RAMS) is a key consideration in the context of the Habitats Regulation Assessment for development proposals. The Suffolk RAMS seeks to mitigate the recreational impacts as a result of new development within the Zones of Influence (ZoI). At the time of the preparation of this Neighbourhood Plan, the RAMS had not been completed and, in the interim period, residential development within the zone of influence will need to deliver measures identified through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.

8.2 Development proposals that incorporate into their design features which provide gains to biodiversity will be supported. Landscaping and planting should, where feasible, encourage wildlife, connect to and enhance wider ecological networks, and include nectar rich planting for a variety of pollinating insects. Divisions between gardens, such as walls and fences, should still enable

Policy ALD7 – Mitigating the Impact of Development on Protected Habitats

Where appropriate, contributions from new housing developments will be required to provide mitigation measures identified in the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) once it has been adopted. Prior to RAMS completion, contributions will be required, where appropriate, through project level HRAs or otherwise, to mitigate any recreational disturbance impacts at the Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar site, in compliance with the UK Habitats Regulations 2017.



movement of species, such as hedgehogs, between gardens and green spaces. Existing ecological networks should be retained.



GLOSSARY

Affordable housing: The NPPF defines Affordable Housing as “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:” Definitions are set out for a) affordable housing for rent; b) starter homes; c) discounted market sales housing; and d) other affordable routes to home ownership.

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 different levels across the globe or be limited to a local area such as a parish.

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

Hinterland Village: Defined in the Babergh Core Strategy 2014 as villages that tend to be small, with very limited facilities and so are dependent on nearby larger villages or urban areas for many of their everyday needs.

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.

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 Babergh District 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 plans: A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

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. Entry level homes, suitable for first time buyers, as defined by paragraph 71 of the NPPF, would also fall into this category.

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.

Site of Special Scientific Interest: Sites designated by Natural England under the Wildlife and Countryside Act 1981.

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.

APPENDIX 1 HOUSING CALCULATION

In the absence of an up- to-date housing requirement at the district level and any indicative figure for Aldham being provided by Babergh, the has been used to calculate a requirement. It uses the Government's 2014 Household Projections as requested by the Secretary of State in an announcement in October 2018. A base date of 1 April 2018 has been used for this Plan as it reflects the most recent land availability data available when work on the Neighbourhood Plan commenced.

The calculation for Babergh district is shown below.

- a) Projected household growth 2014 – 2036 6,000
- b) Annual average growth 318 dwellings per annum
- c) Adjustment for market signals * b x 1.43
- d) Adjusted annual requirement 455
- e) Total requirement 2014 – 2036 10,010

* Based on comparison of median house prices to median workplace earnings

- f) Completions 2014- 2018 886
- g) Permissions not completed at 1 April 2018 4,377
- h) Additional sites required across Babergh 2018 – 2036 (e-f-g) 4,750 #

The conclusions of this calculation are that there is a need to find new sites for an at least 4,750 homes across Babergh district as of 1 April 2018. Any consequent permissions granted since that time will be deducted from that figure.

The August 2017 Joint Local Plan consultation proposed a range of growth across Hinterland Villages of between 5% and 15% of the housing requirement. Notwithstanding the belief that Aldham should be designated as a Hamlet in the emerging Joint Local Plan, we have applied the net requirement calculated above to the August 2017 options, based upon the proportion of the population in the village compared with the total of all proposed Hinterland Villages in Babergh.

Hinterland Housing Requirement based on Joint Local Plan Options – August 2017

	2011 Population	% population of Hinterland Villages		Option BHD1 - Hinterland Villages 5%	Option BHD2 - Hinterland Villages 15%	Option BHD3 - Hinterland Villages 10%	Option BHD4 Hinterland Villages 5%
All Hinterland Villages	15,677			238	713	475	238
Aldham	175	1.1		3	8	5	3

ALDHAM

NEIGHBOURHOOD PLAN

2018-2036

