

BRETTENHAM NEIGHBOURHOOD PLAN 2024-2037



Brettenham Parish Council

A STATE AND A STATE OF

JUNE 2024

Prepared for Brettenham Parish Council by Places4People Planning Consultancy June 2024



CONTENTS

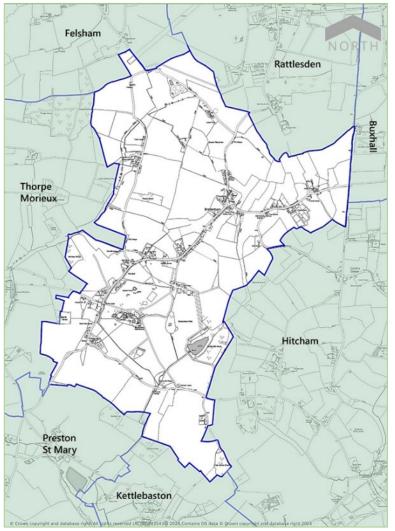
1.	Introduction	3
2.	Background to the Preparation of the Neighbourhood Plan	4
3.	Regulation 14 Pre-Submission Consultation	6
4.	Pre-Submission Consultation Responses	7
Appe	ndix 1 - Pre-submission consultation leaflet	8
Appe	ndix 2 – January 2024 Drop-in Event Display	12
Appe	ndix 3 – Statutory Consultees Notified of Regulation 14 Consultation	27
Appe	ndix 4 – Statutory Consultee Consultation Notice	29
Appe	ndix 5 – Summary of Responses to Consultation Questions	30
Appe	ndix 6 - Responses received to Pre-Submission Consultation, Responses to Comments and	
	Proposed Changes	38
Appe	ndix 7 - Schedule of Post Pre-Submission Consultation Modifications	88

1. Introduction

- 1.1 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 (as amended) in respect of the Brettenham Neighbourhood Plan.
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
 - contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - explain how they were consulted;
 - summarise the main issues and concerns raised by the persons consulted; and
 - describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.
- 1.3 The policies contained in the Neighbourhood Plan are the culmination of engagement and consultation with residents of Brettenham as well as other statutory bodies. This has included a household survey and consultation events at appropriate stages during the preparation of the Plan.

2. Background to the Preparation of the Neighbourhood Plan

- 2.1 The Neighbourhood Plan has been prepared in accordance with the requirements of the Government's Neighbourhood Planning Regulations and, in particular, has involved considerable local community engagement to gather evidence for the content of the plan and later inform the plan's direction and policies. The content of the Neighbourhood Plan has been generated and led by the community and shaped by results of surveys and drop-in events, to ensure that the Neighbourhood Plan reflects the aspirations of the community.
- 2.2 In 2020, the Parish Council took the decision to prepare a Neighbourhood Plan. On 15 December 2020, Brettenham Parish Council submitted an application to define the boundary of the area to be covered by the neighbourhood plan to Babergh District Council. On 4 January 2021 the Neighbourhood Area was formally designated by Babergh District Council, as illustrated on Map 1. From that time a small group of volunteers, agreed by the Parish Council, managed the gathering of information to support the preparation of the Plan.



Map 1 - The Neighbourhood Plan Area

- 2.3 Following the designation of the Neighbourhood plan area January 2021, a Residents' Survey was carried out which resulted in 64 responses. The survey sought views on a whole range of matters many of them beyond the remit of a Neighbourhood Plan. The results are published in a separate report that is published in support of the Plan. The responses in relation to planning matters that can be addressed through the Neighbourhood Plan included:
 - lack of affordable housing;
 - impact of new housing on the character of the village;
 - light pollution; and
 - poor broadband

- 2.4 The content of the Neighbourhood Plan has also been informed by evidence reports as appropriate and proportionate to the content of the Plan and the matters it addresses. The evidence reports are:
 - Brettenham Design Guidance and Codes: AECOM, October 2021
 - Brettenham Local Green Space Assessment: Brettenham Parish Council, January 2024
 - Brettenham Non-Designated Heritage Assets Assessment: Brettenham Parish Council, January 2024
 - Brettenham Appraisal of Views: Brettenham Parish Council, June 2024

All these reports are available separately to download on the Neighbourhood Plan pages of the Parish Council website.

2.5 On 9 November 2023 the Parish Council considered the draft and approved it for the purposes on Pre-Submission consultation in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended). That consultation and its outcomes form the main focus of this Consultation Statement.

3. Regulation 14 Pre-Submission Consultation

3.1 The statutory consultation commenced on 21 January 2024 and lasted for seven weeks to 8 March (inclusive).

How we publicised the consultation

- 3.2 The consultation was publicised by a summary leaflet (reproduced in Appendix 1) that was distributed to every household and business in the parish. The leaflet summarised the main purpose and content of the Plan and ensured recipients were informed as to how the actual Plan could be viewed and how they could comment on it. The consultation was also launched with a well-attended drop-in event held at the Village Hall on 21 January in association with the "Village Inn" run on the 3rd Sunday of each month. The display boards for the drop-in event are included as Appendix 2 of this Statement.
- 3.3 Hard copies of the Plan were made available to view at the drop-in event and to borrow from specified parish councillors, as advised on the leaflet and on the neighbourhood plan pages of the Parish Council website. Both an online and paper comments form was produced, with paper copies of the form being available at the drop-in event and the same councillors.
- 3.4 At the start of the consultation, all the statutory Regulation 14 consultees, as advised by Babergh District Council, were consulted. The full list of bodies consulted is shown in Appendix 3 and the email content used to notify them is included at Appendix 4.
- 3.5 Details of the responses received during the pre-submission consultation period are detailed later in this Consultation Statement.

4. **Pre-Submission Consultation Responses**

5.1 A total of 29 people or organisations responded to the Pre-Submission Consultation as listed below.

The following individuals or organisations submitted comments:

K Ozficici	A Tavener	M Kelly
Pearce	A Wilson	P Knight
L O'Hara	G Bourne	G Moulding
N Tavener	E Keoghane	C Clarke
T Tavener	G Roberts	P Harpley

Babergh District Council Suffolk County Council Historic England National Power National Gas National Highways Suffolk Wildlife Trust Suffolk Fire and Rescue Environment Agency Natural England Anglian Water

Plus three anonymous responses

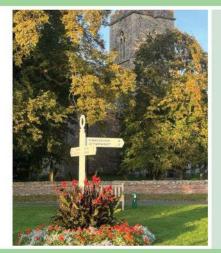
5.2 A summary of the responses to questions as to whether the individual policies, community aspirations and general content is illustrated in Appendix 5. A schedule of full comments, and the responses of the Parish Council to them, is set out in Appendix 6 of this Statement. As a result, the Submission version of the Neighbourhood Plan has been appropriately amended as identified in the "changes made to Plan" column of the Appendix. Further amendments were made to the Plan to bring it up-to-date and Appendix 7 provides a comprehensive list of all the modifications to the Pre-Submission Plan following consultation.

Appendix 1 - Pre-submission consultation leaflet



Your chance to comment on the Draft Plan





Consultation Drop-in Event at the Village Inn Sunday 21 January 12.00 - 14.30

We need your comments by Friday 8 March

Brettenham Parish Council

Since early 2021, the Parish Council has been progressing with the preparation of a neighbourhood plan with the help of volunteers and professional support.

A neighbourhood plan is a community-led plan for guiding future development of an area. Once complete it will become part of the legal planning framework for the area, sitting alongside the Babergh Local Plan and used when planning applications are decided.

The Neighbourhood Plan covers these key themes:

Each theme is supported by planning policies that will be used in determining planning applications. In addition, the Plan contains "community actions" addressing non-planning concerns that were raised by residents when we carried out surveys.

We've now reached a major milestone and are commencing consultation on the Draft Plan. Consultation commences on **Sunday 21 January and lasts until Friday 8 March, a period of 7 weeks.** It's your chance to say whether or not you support the content of the Plan or would like to see some changes.

THE FINAL PAGE OF THIS LEAFLET EXPLAINS HOW YOU CAN COMMENT.

It is important that you use this opportunity to have your say, even if you're fully supportive of the Plan.

Following this consultation, all comments will be reviewed and necessary changes made before the Plan is submitted to the District Council. They will carry out further consultation and then send the Plan to an Independent Neighbourhood Plan Examiner for review. Following the examination, those residents of the Parish that are on the Register of Electors will then be given an opportunity to vote at a Parish Referendum whether the Plan should be used by Babergh District Council when deciding planning applications.

THE PLAN STARTS WITH A VISION:

In 2037 Brettenham will be a distinct rural village accommodating limited sustainable development that:

- Meets the needs of the local community;
- Respects the high quality of the historic and natural environment.

This is followed by theme objectives and planning policies that reflect the Vision.

PLANNING STRATEGY

The Plan defines up-to-date and tightly drawn Settlement Boundaries around The Street and the cluster of houses on Church Road, as illustrated on the map. In line with national and local planning policies, the Plan supports proposals for development within the Settlement Boundaries where they do not have a detrimental impact on residential amenity, the natural and historic environment, infrastructure and highways. Outside the Settlement Boundaries, priority will be given to protecting the countryside from inappropriate development.





HOUSING

The Neighbourhood Plan does not allocate any new sites for housing development.

There may be opportunities for infill housing plots within the Settlement Boundaries, subject to impact on the local environment, neighbouring properties and infrastructure.

The affordability of housing to enable people to stay in the village was identified as an issue during the preparation of the Plan. A policy is included that would enable affordable housing to be developed on acceptable sites outside but adjoining the Settlement Boundary under the Government's "exception site" guidelines that would be for people with a local connection that cannot afford to buy on the open market. The housing would be provided by a housing association and always remain affordable.

The Plan also includes a policy addressing how proposals outside the Settlement Boundaries for replacement dwellings or for the conversion of buildings to housing will be considered.

NATURAL ENVIRONMENT

We know that the parish is rich in wildlife habitats and that the landscape is such that there are extensive views and important woodlands. The draft Plan seeks to conserve the rural landscape and will require any proposals outside the Settlement Boundaries to be accompanied by a Landscape and Visual Impact Assessment that demonstrates how the proposal can be accommodated in the countryside without having a significant adverse impact on the character and appearance of the countryside.

A number of important views from public areas are identified, the key elements of which must be preserved.

New Government legislation now requires most development to provide measurable biodiversity net gain in their proposals. The draft Plan requires proposals to avoid the loss of, or substantial harm to, distinctive trees, hedgerows and other natural features such as ponds and watercourses.

The draft Plan also designates three "Local Green Spaces" which will be protected from development. The designations are:

- 1. the triangle of land at the junction of
- The Street, Buxhall Road and Church Road
- 2. the playground next to the Village Hall
- 3. the Cemetery at St Mary the Virgin



COMMUNITY ACTION 1 seeks to work with the County Council to manage the grass verges in a way that will benefit and enhance biodiversity and liaise with landowners to identify areas suitable for planting wildflower meadows, trees and hedgerows.

BUILT ENVIRONMENT & DESIGN

Much of the parish is covered by a conservation area and there are also 24 listed buildings, of which the church of St Mary the Virgin is Grade I listed. Preparing the Neighbourhood Plan has enabled the investigation of whether other buildings and built features in the parish have an historic importance. Using guidance produced by Historic England, the following six Non-Designated Heritage Assets have been identified in the Plan:

- Centre Academy
- Chapel Hill properties
- Fir Cottage, Church Road
- The Victorian School, Old School Road
- Village Hall, The Street
- The Grange/Potash Farm

Planning applications at these properties, or in their vicinity, will have to take into account their character and historic importance.

The design of development was highlighted as an important matter in the Neighbourhood Plan survey. Design Guidance has been prepared for the village by consultants and funded by the Government support programme. It provides comprehensive guidance for new developments and the Neighbourhood Plan sets out a number of design criteria that planning applications will have to take into account.

The Plan also includes policies to reduce the potential for surface water flooding arising from new development and to limit light pollution.

COMMUNITY ACTION 2 seeks to work with Babergh District Council to update the Conservation Area Appraisal published in 2013.

INFRASTRUCTURE & HIGHWAYS

Local facilities and services are also valued by residents. The newly adopted Babergh Local Plan contains a policy to protect such facilities and enables the provision of new facilities in appropriate locations.

COMMUNITY ACTION 3 states that the Parish Council will continue to monitor broadband provision and work with suppliers to ensure acceptable speeds are available

Brettenham is fortunate to have a good network of public rights of way and a policy seeks to improve and extend the network.

COMMUNITY ACTION 4 seeks to explore opportunities to improve and extend the public rights of way network The number of households in Brettenham with two or more cars is higher than across Babergh as a whole. While not many new houses will be built in the village, the Plan sets higher parking requirements to reflect the reliance on cars to get anywhere.

The impact of traffic is high on the concerns of residents but there is little that planning policies can do about speed and volume. Brettenham is fortunate to have a good network of public rights of way and a policy seeks to improve and extend the network. **COMMUNITY ACTION 5** states that the Parish Council will seek to secure a range of measures to reduce speeds and the impact of vehicles



HOW TO COMMENT

The full version of the Plan will be available to download at http://brettenham.onesuffolk.net/

from Friday 19 January, 2024 where an online comments form will also be available to complete.

If you don't have access to the internet, paper copies of the Plan will be available to borrow for a short period from: Alyson Wilson 07798 633044 Nick Taverner 01449 736412 or 07711 927202

Drop-in Event

We'll be at the Village Hall on at the Village Inn event on Sunday 21 January between 12.00 and 14.30 where you'll be able to find out more about the Plan.

How to comment

During the consultation period the Neighbourhood Plan website will have an online survey form which you can complete.

You can also collect a paper response form at the Drop-in Event or from: Alyson Wilson 07798 633044 Nick Taverner 01449 736412 or 07711 927202

The forms explain how you can submit them.

We want your comments, even if you support everything in the Plan. COMMENTS MUST BE RECEIVED BY 8 MARCH - WE CANNOT ACCEPT COMMENTS AFTER THIS TIME

Appendix 2 – January 2024 Drop-in Event Display



What is a Neighbourhood Plan?

It is a relatively new kind of planning document designed to allow local people to play an active part in planning for their area.



Over the next 7 weeks you have an opportunity to read the Plan and submit your comments.



WE NEED YOUR VIEWS BY 8 MARCH Why not comment as you go round by accessing the comments form from your mobile phone using the QR code?

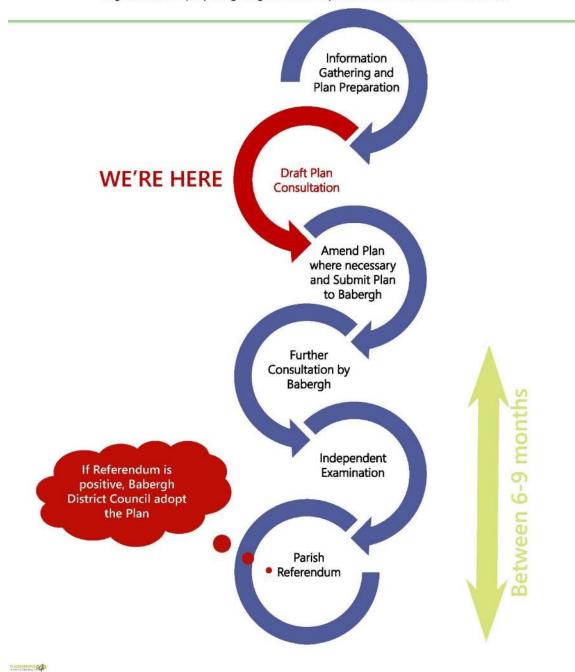
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How the Plan is prepared

There are several stages that must be completed, as illustrated. These stages are governed by the regulations for preparing neighbourhood plans and so there is no short cut.







The Neighbourhood Plan itself runs to 48 pages and is necessarily quite complex in places. This is because it will be used by Babergh District Council and Government Planning Inspectors to make decisions on planning applications.

Based on the issues identified by you during the initial stages of preparing the Plan, the following themes have been identified.

- Planning Strategy
- Housing
- Landscape and Natural Environment
- Built Environment and Design
- Infrastructure and Highways

The Plan contains:

Planning Policies

These will be used to supplement the Local Plan when decisions on planning applications are made.

Planning policies can only cover matters that would require planning permission, so they can't, for example, tackle speeding.

Policies Maps

These illustrate areas of land or buildings where policies in the Plan apply.

Community Actions

Local initiatives to address non-planning matters and concerns, primarily raised in the Residents' Survey. Neighbourhood Plans cannot contradict the main government planning policies or the strategic policies in the Local Plan for the area.

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For example, they cannot propose less development than is planned for in the adopted Local Plan.

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A Vision and Objectives



Neighbourhood Plan Vision

In 2037 Brettenham will be a distinct rural village accommodating limited sustainable development that:

- Meets the needs of the local community;
- Respects the high quality of the historic and natural environment.

The Vision translates into the following Objectives that cover the Plan's themes

Housing

- 1. Ensure that new housing development is of a scale and location to minimise impact on the character of the village
- 2. Support the delivery of housing that meets identified local needs of the village

Landscape and Natural Environment

- 3. Minimise the impact of development on the natural environment and improve biodiversity.
- 4. Protect and enhance the local landscape and significant views.

Built Environment and Design

- 5. Ensure new development is appropriate to the character of the Village, is well designed and incorporates measures that reduces environmental impact.
- 6. Recognise and protect the historic importance of buildings and features.
- 7. Maintain and enhance a strong rural identity and sense of place for the parish.

Infrastructure and Highways

8. Improve road safety, protect and enhance Bretteham's public rights of way and reduce the impact of traffic passing through the Parish.

DO YOU SUPPORT THE VISION AND OBJECTIVES?

Internet Rep

5 Planning Strategy



Context

- The Plan takes a balanced view on the location of new development, designating Settlement Boundaries around the main built-up areas of the village.
- They are based on the 2006 Babergh Local Plan (illustrated by black dashed lines on the maps) and the draft Babergh Local Plan published in 2020 but yet to be confirmed.
- They bring the 2006 boundaries up-to-date, reflecting development that has taken place since that time plus the content of the Neighbourhood Plan.
- The map illustrate the Neighbourhood Plan
 Settlement Boundaries in red.
- Planning applications for development within this area will be supported where they do not have a detrimental impact on residential amenity, the natural and historic environment, infrastructure and highways.
- Outside the Settlement Boundary, and in accordance with the recently adopted Local Plan as well as national policies, priority will be given to protecting and enhancing the countryside from inappropriate development and development will only be allowed in specified exceptional circumstances.

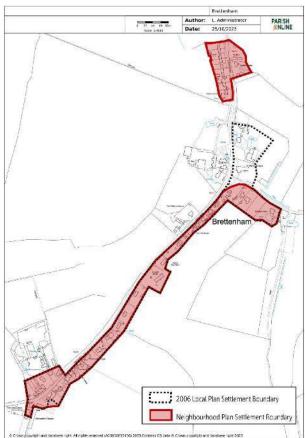


Policy BRET 1 - Spatial Strategy

Settlement Boundaries are defined on Map 1 and the Policies Map.

Within the Settlement Boundaries, new development will be supported in principle, subject to the application of policies in the adopted Local Plan and this Neighbourhood Plan.

Proposals for development located outside the Settlement Boundaries will only be permitted where they are in accordance with national, district and neighbourhood level policies.



DO YOU SUPPORT THIS POLICY?

6 Housing



Context

- The Government is seeking to boost the supply of homes, but acknowledges that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs, including proposals for community-led development for housing.
- The new Joint Local Plan establishes that, pending preparation of the Part 2 Joint Local Plan, new housing development will come forward through existing planning permissions, windfall development and any allocations in Neighbourhood Plans.
- The Neighbourhood Plan does not allocate any new sites for housing development
- Opportunities may still exist for infill plots within the Settlement Boundaries and in such circumstances supported in principle, subject to impact on the character and appearance of the settlement, the landscape, residential amenity and heritage features.

Affordable Housing

- National planning policy enables an alternative mechanism for meeting locally identified affordable housing needs through "rural exception sites" located outside but adjoining the Development Envelope where housing would not normally be permitted
- It does enable small affordable housing schemes to be built outside the Development Envelope for those with a proven local connection who cannot afford to buy.
- In order to deliver such a scheme, the following must apply:

A local need has to be established, usually through a detailed parish housing needs survey carried out on behalf of the Parish Council

A willing landowner prepared to sell land at a price significantly below the market value for housing land

A registered social landlord (housing association) willing to work with the Parish Council and District Council to fund and manage a scheme

Policy BRET 2 - 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 72 of the NPPF) on rural exception sites outside the Settlement 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:

- Remains affordable in perpetuity; and
 Is for people that are in housing need because they are unable to buy or rent properties in the Village at open-market prices; and
- iii. Is offered, in the first instance, to people with a demonstrated local connection, as defined by the Babergh District Council Choice Based Lettings Scheme. Where there is no need, 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 otherwise 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 need 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 it can be demonstrated:

- That no other means of funding the construction of the affordable homes is available; and
- b. The market housing is subsidiary to the affordable housing element of the proposal and the amount of market housing required is, as demonstrated through a viability assessment, the minimum required to deliver the affordable housing. Proposals including more than 35% open market housing will not be permitted.

Where sites for affordable housing in the countryside are brought forward with an element of market housing, both housing tenures should be built to the same design standards and contribute towards the character of the area.

DO YOU SUPPORT THIS POLICY?

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Replacement dwellings and conversion of buildings to residential use outside Settlement Boundaries

- Situations can arise where the replacement of an existing house is more economic than the cost of repairing or altering an existing building.
- As the principle of development is established by the existing dwelling, wherever it is located in the parish, its replacement will generally be acceptable subject to there being no detrimental impacts on residential amenity and the characteristics of the local area.
- Proposals for replacement dwellings should not result in a significant increase in the floorspace of the original dwelling.
- Local Plan Policy LP04 "Replacement Dwellings and Conversions" provides guidance as to how proposals will be considered but, given the potential for detrimental impact on the landscape, the Neighbourhood Plan provides further criteria that will be used to supplement Policy LP04 when considering proposals for replacement dwellings and conversions.

Policy BRET 3 – Replacement dwellings and conversion of buildings to residential use outside Settlement Boundaries

In addition to Policy LP04 of the Joint Local Plan – Part 1, proposals for the replacement of existing dwellings and the conversion of buildings to residential use outside the defined Settlement Boundary should demonstrate that:

- The replacement dwelling or conversion would not have a detrimental impact, or be more intrusive in the landscape, or countryside setting, or on heritage assets and their settings, than the original building;
- ii. The replacement dwelling is positioned on or close to the footprint of the existing dwelling, unless design, landscape, highway safety, residential amenity or other environmental grounds indicate that a more appropriate location on the plot can be justified;
- The size of the replacement dwelling is not significantly larger than the original dwelling, irrespective of any outbuildings demolished on the site, and is appropriate to the countryside setting; and
- The development includes an acceptable landscape scheme to retain and improve the rural nature of the locality.

Applications for a replacement dwelling outside the Settlement Boundary would be expected to provide a detailed analysis, through a landscape and visual impact assessment, of the visual impact of the new dwelling on the landscape or countryside setting.

Increases in plot size to form additional garden, parking or amenity land will not be supported.





DO YOU SUPPORT THIS POLICY?

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Landscape and Natural Environment

Context

- The Parish is dominated by arable farmland, with farmsteads scattered across the parish. Medium to large fields with hedgerows, occasional copses and larger woodland create a simple landscape pattern.
- According to the Joint Babergh and Mid Suffolk Landscape Guidance produced in 2015, Brettenham Parish lies within the wider 'ancient rolling farmlands" character area.
- Local Plan Policy LP17 covers landscape and requires development proposals to:
 - Integrate positively with the existing landscape character of the area and reinforce the local distinctiveness;
 - Be sensitive to the landscape and visual amenity impacts (including on dark skies and tranquil areas) on the natural environment and built character; and
 - Consider the topographical cumulative impact on landscape sensitivity.

Views

- The nature of the landscape in and around Brettenham means that there are several distinct views into, out of and within the village that are of high importance to its character, setting and sense of rurality.
- As part of the neighbourhood plan process, the most important views have been identified on the map and are described in the separate Assessment of Important Views.

Policy BRET 4 - Protecting Brettenham's Landscape Character

To conserve the essential landscope, heritage and rural character of the Neighbourhood Plan Area, development proposals shall, proportionate to the proposal demonstrate:

- how the landscape characteristics of the site and its vicinity have informed the design of the proposal; and
- ii. how the proposal has regard to, conserves and enhances, the rural and landscape character and the setting of the built-up areas of the parish, having regard to Joint Babergh and Mid Suffolk Landscape Guidance 2015.

Proposals for new buildings outside the 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 significant adverse impact, by reason of the buildings scale, materials and location, on the character and appearance of the countryside and its distinction from the built-up area.

Policy BRET 5 - Protection of Important Views

Important views from public vantage points either within the built-up area or into or out of the surrounding countryside, are identified on the Policies Map. Any proposed development should not detract from the key landscape features of these views.

Proposals for new buildings outside the Settlement Boundaries should be accompanied by a Landscape Visual Impact Assessment, or other appropriate and proportionate evidence, that demonstrates how the proposal can be accommodated in the countryside without having a significant detrimental impact, by reason of the buildings' scale, materials and location, on the key features of the views.

DO YOU SUPPORT THESE POLICIES?

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Landscape and Natural Environment

Biodiversity and wildlife corridors

- There are no defined nature conservation sites within the parish. However, all of the parish lies within the Impact Risk Zone of Thorpe Morieux Woods and Great Hastings Wood Site of Special Scientific Interest.
- Across the parish the influence of trees and hedgerows play a significant role in determining the character of the area.
- Our hedgerows and woodlands provide a wide range of habitats for various species.
- Nationally, a statutory requirement for all appropriate developments to deliver a minimum 10 per cent measurable net gain in biodiversity is about to be introduced.



Community Action 1 – Natural Environment Enhancements

The Parish Council, working with the community, will:

- seek to work with Suffolk County Council to manage the grass verges in a way that will benefit and enhance biodiversity; and
- liaise with landowners to identify areas suitable for planting wildflower meadows, trees and hedgerows.

Local Green Spaces

- National planning policy 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.

Policy BRET 7 – Local Green Spaces

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

- 1. the triangle of land at the junction of The Street, Buxhall Road and Church Road
- 2. the playground next to the Village Hall
- 3. the Cemetery at St Mary the Virgin

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

Policy BRET 6 - Biodiversity and Wildlife Corridors

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

- the benefits of the development proposal must be demonstrated to clearly outweigh any impacts; and
- 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 Brettenham's traditional trees and hedgerows);
- c) the installation of bird and bat boxes; and
- d) restoring and repairing fragmented wildlife networks.



DO YOU SUPPORT THESE POLICIES AND COMMUNITY ACTION?

Non-second Rap

Built Environment and Design

Context

Heritage

- One of the defining characteristics of Brettenham is the extent of its conservation area and the distribution of listed buildings throughout the village. The historic character of the village is emphasised by the traditional Suffolk materials including rendered timber frames, Suffolk brick both red and white and thatched cottages.
- There is one Grade I listed building (the church), two Grade II* listed buildings and twenty-one Grade II listed buildings,

Non-Designated Heritage Assets

- The preparation of the Neighbourhood Plan has provided an opportunity to identify whether there are further buildings or features across the Parish that have special qualities or historic association and which make a "positive contribution" to the character of the area in which they sit.
- Historic England define these as Non-Designated Heritage Assets and provides guidance on how to identify such assets.
- 10 properties or features have been identified as meeting Historic England's definition.
- Whilst the identification provides no additional planning controls, the fact that a building or site is identified means that its conservation as a heritage asset is a material consideration when determining the outcome of a planning application. If something doesn't need planning permission now, it will not need it with the designation.
- The designation also means that proposals in the vicinity of the asset should take account of its importance.

Policy BRET 8 - Buildings of Local Heritage Significance

The retention, protection and the setting of the following Buildings of Local Heritage Significance, as listed below and identified on the Policies Map, will be secured.

- 1. Centre Academy
- 2. 10 & 11 The Gardens, Bury Road
- 3. Fir Cottage, Church Road
- 4. The Victorian School, Old School Road
- 5. Village Hall, The Street
- 6. The Grange/Potash Farm

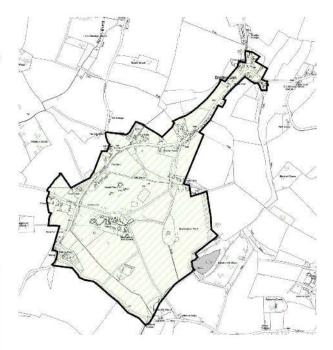
Proposals that would cause harm to the significance of these buildings and features should be supported by an appropriate analysis of the significance of the asset to enable a balanced judgement to be made having regard to the scale of any harm or loss and significance of the heritage asset.

Conservation Area

 Babergh District Council prepared a Conservation Area Appraisal in 2013, includes a number of interesting facts about some of the listed buildings.

Community Action 2 - Conservation Area Appraisal

The Parish Council will seek to work with Babergh District Council to update to the Conservation Area Appraisal to incorporate the identified Character Areas.





DO YOU SUPPORT THIS POLICY AND COMMUNITY ACTION?

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Built Environment and Design

Development Design

- As part of the Government's neighbourhood planning support programme, Design Guidance and Codes for the Parish have been prepared.
- It provides Design Principles and guidance that seeks to inform the design of new development in order to retain and protect the character and distinctiveness of Brettenham.
- New development in Brettenham should achieve a high-quality design that enhances the unique characteristics of the village and ensures a better quality of life for residents.



- The new Local Plan contains a policy with number of criteria to: reduce CO2 emissions,
 - reduce water consumption,
 - adapt to climate change,
 - minimise energy demand including the introduction of energy efficiency measures.
 - support installing on-site renewable and other low-carbon energy generation.
 - incorporate sustainable building materials, and
 - plan for the future risks associated with climate change.
- Given these requirements, there is no need to include a separate policy in the Neighbourhood Plan.

Design Principles

- Harmonise with and enhance the existing settlement in terms of physical form, movement pattern and land use; Relate well to local topography and landscape features,
- including prominent long-distance views; Reinforce or enhance the established character of streets
- and other spaces;
- Integrate with existing paths, streets, circulation networks and patterns of activity;
- Provice adequate open space for the development in terms of both quantity and quality;
- Reflect, respect and reinforce local architecture and historic distinctiveness:
- Retain and incorporate important existing langscape and built form features into the development
- Respect surrouncing buildings in terms of scale, height, form and massing
- Adopt contextually appropriate materials and details;
- Incorporate necessary services and drainage infrastructure without causing unacceptable harm to retained features;
- Ensure all components e.g. buildings, landscapes, access routes, parking and open space are well related to each other; to provide a safe, attractive and cohesive environment
- Make enough provision for sustainable waste management (inclucing facilities for kerbside collection, waste separation and minimisation where appropriate) without adverse impact on the street scene, the local lanoscape or the amenities of neighbours; and
- Sensitively integrate energy efficient technologies within the scheme at the start of the design process.

Policy BRET 9 – Design Considerations

Proposals for new development must reflect the local characteristics in the Neighbourhood Plan Area and create and contribute to a high quality, safe and sustainable environment.

Planning applications should, as appropriate to the proposal, demonstrate how they maintain the local character as defined in the Brettenham Neighbourhood Plan Design Guidance and Codes in Appendix C.

- In addition, proposals will be supported where they:
- a. recognise and address the key features, characteristics, landscape/building character and form, local distinctiveness and special qualities of the area in order to maintain the rural feel of the Parish;
- b. do not involve the loss of gardens, open, green or landscaped areas, which make a significant contribution to the character and appearance of that part of the Village;
- C.
- reflect the character and nature of the village by: i. ensuring plots depths and arrangement of the building on the plot complement existing development;
 - ii. include boundary treatments that reflect the character and materials of the local vicinity;
 iii. roof height and form does not conflict with those in the locality of the site;
 - iv. use of contextually appropriate materials and architectural features to enhance the details of the proposal to reflect, respect, and reinforce local architecture and historic distinctiveness;
 - respect surrounding buildings in terms of scale, height, form and massing;
- d. taking mitigation measures into account, do not affect adversely:
 - any historic, architectural or archaeological heritage assets of the site and its surroundings;
 - ii. important landscape characteristics including trees and ancient hedgerows and other prominent topographical features;
- where appropriate to the nature of the development, make adequate provision for the covered storage of all wheelie bins;
- include suitable ducting capable of accepting fibre to enable ultrafast broadband;
- cycle parking provision shall be in accordance with those expressed in the Suffolk Parking Guidelines and shall include secure and covered storage where appropriate to the development.

DO YOU SUPPORT THIS POLICY?

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D Built Environment and Design

Flooding

- Whilst the extent of flood zones 2 and 3 are restricted to the river valley to the south of the parish, surface water flooding is a problem in some areas of the parish.
- Local Plan Policy LP27 sets out key requirements in relation to flood risk and vulnerability, and the Neighbourhood Plan aims to ensure new development does not exacerbate the situation and that flood matters are considered as an integral part of the design process.
- For all development, regardless of whether the site is within a flood zone, it is essential that on-site drainage is managed to capture surface water run-off in a sustainable manner.

Policy BRET 10- Flooding and Sustainable Drainage

Proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site 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 aboveground 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.



Light Pollution

- It is acknowledged that the 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.
- Government policy 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"

Policy BRET 11 - Dark Skies

While ensuring that new developments are secure in terms of occupier and vehicle safety, dark skies are to be preferred over lighting. 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 of individuals and premises.

Proposals for lighting schemes should be supported by a lighting study and be designed to reduce the consumption of energy by promoting efficient outdoor lighting technologies, keeping the night-time skies dark, reducing glare and be of a frequency (spectrum) of illumination to reduce wildlife impact.

The lighting should only be operational during times when it is essential for the operation of the business and out of operational hours security trigger lighting should be installed.

DO YOU SUPPORT THESE POLICIES?

ILACIS APEOTLE POP

] **3** Infrastructure and Highways



- The village size, along with the access to Stowmarket, Bury St Edmunds and Lavenham, probably accounts for the lack of day-to-day facilities and services in the village.
- The nearest local shop and Post Office is at Hitcham.
- Broadband speeds are limited, with only 7.35% of premises having access to superfast broadband and at present fibre broadband is not available.
- There is only one bus a week, which is more than some local villages have, and which goes to Bury St Edmunds and Lavenham.
- Given that the Plan does not promote development, there are limited opportunities for infrastructure matters to be resolved through securing improvements via planning permissions coming forward.

Car ownership

- Car ownership levels across the Parish are generally higher than Babergh as a whole as illustrated in the chart.
- These higher levels of car ownership result in an increased pressure on space both within the grounds of established dwellings and on the roads in the vicinity.
- Given the higher levels of car ownership in Brettenham, it is reasonable that parking standards should also be set at a higher level than the recommended minimum requirements

Public Rights of Way

 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 BRET 13 – Public Rights of Way

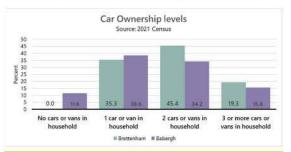
Measures to improve and extend the existing network of public rights of way and bridleways will be supported where their value as biodiversity corridors is safeguarded and any public right of way extension is fit for purpose. Where practicable development proposals should incorporate measures to enhance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

Community Action 4 - Public Rights of Way Network

The Parish Council will explore opportunities to improve and extend the public rights of way network.

Community Action 3 – Broadband

The Parish Council will continue to monitor broadband provision across the parish and work with suppliers to ensure access at acceptable speeds for all households that want it.



Policy BRET 12 - 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:

House 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 residential car parking space, one electric vehicle charging point shall be provided.





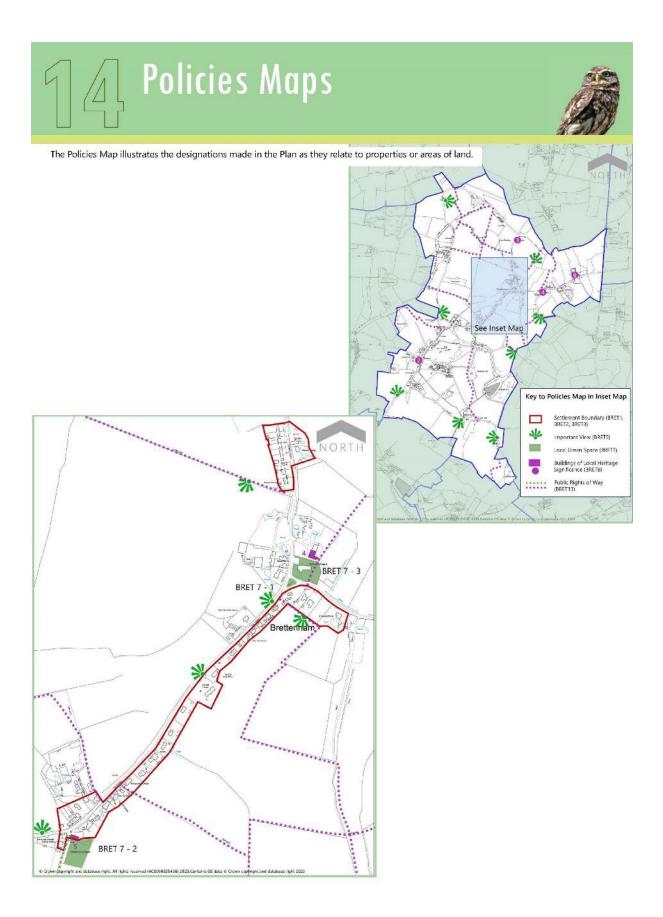
Community Action 5 - Highways Improvements

The Parish Council will:

- seek to work with the County Council as the highway authority to look at ways of addressing speeding in the village;
- seek the installation of appropriate traffic calming measures including 'gateways' and interactive speed awareness signs.;
- seek the installation of signs to indicate motorists share the road with pedestrians; and
- seek improvements to passing places to reduce damage to the rural verges.

DO YOU SUPPORT THESE POLICIES AND COMMUNITY ACTIONS?

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Consultation on the Neighbourhood Plan ends on 8 March

At the end of the consultation the Working Group will review all submitted comments before deciding if any amendments to the Plan are required.

At the same time a "Consultation Statement" and a document known as the "Basic Conditions Statement" will be prepared. The Final Draft Plan – known as the "Submission Plan" and the above documents will be put to the Parish Council for approval for submission to Babergh District Council.

Further Consultation

Babergh District Council will carry out a further six-week consultation on the Neighbourhood Plan before it is submitted to an Independent Examiner.

Examination

The Independent Examiner will review the Plan and consider any objections to it.

The Examiner's Report will recommend whether the Plan, possibly with amendments, should proceed to a referendum in the parish.

Referendum

If the Examiner recommends that a Referendum on the Plan should take place, this will be organised and paid for by Babergh District Council in the same way as a local election. Notice will be given of the Referendum and all those living in the parish that are entitled to vote will be asked whether the Neighbourhood Plan should be approved. No matter how many turn out to vote, if more votes say "Yes" then the Neighbourhood Plan will be adopted.

You can submit your comments on the Draft Neighbourhood Plan online at the Parish Council website or, if you don't have the internet, by completing a comments form and returning it to the address on the form

Why not complete a form today?

INCOMPANY ROOM

Appendix 3 – Statutory Consultees Notified of Regulation 14 Consultation

Position	Body
MP for South Suffolk	
MP for Bury St Edmunds	
County Cllr to Cosford Division	Suffolk County Council
County Cllr to Thedwastre South Division	Suffolk County Council
Ward Cllr to N West Cosford	Babergh District Council
Ward Cllr to Rattlesden	Mid Suffolk District Council
Parish Clerk	Rattlesden Parish Council
Parish Clerk	Buxhall Parish Council
Parish Clerk	Hitcham Parish Council
Parish Clerk	Kettlebaston Parish Council
Parish Clerk	Preston St Mary Parish Council
Parish Clerk	Thorpe Morieux Parish Council
Parish Clerk	Felsham Parish Council
BMSDC Community Planning	Babergh & Mid Suffolk District Councils
SCC Neighbourhood Planning	Suffolk County Council
Land Use Operations	Natural England
Essex, Norfolk & Suffolk Sustainable Places Team	Environment Agency
East of England Office	Historic England
East of England Office	National Trust
Town Planning Team	Network Rail Infrastructure Limited
	Highways England
Stakeholders & Networks Officer	Marine Management Organisation
Policy Section	British Telecom
	Vodafone and O2 - EMF Enquiries
	Three
	EE
Estates Planning Support Officer	Ipswich & East Suffolk CCG & West Suffolk CCG
Avison Young (obo National Gas Transmission)	National Gas Transmission
Avison Young (obo National Grid)	National Grid
Stakeholder Engagement Team	UK Power Networks
Spatial Planning Advisor	Anglian Water
Planning Liaison Team	Essex & Suffolk Water
DIO Assistant Safeguarding Manager	Defence Infrastructure Organisation
	National Federation of Gypsy Liaison Groups
Head of Equality, Diversity and Inclusion	Communities & Environmental Services
	Diocese of St Edmundsbury & Ipswich
Chief Executive	Suffolk Chamber of Commerce
Strategy Manager	Freeport East
Conservation Officer	RSPB
Conservation Officer (Essex, Beds & Herts)	RSPB
Conservator of Forests	Forestry Commission
Senior Planning Manager	Sport England (East)
Senior Planning Manager	Sport England (East) The Crown Estate Office
Senior Planning Manager	
Senior Planning Manager Water Officer	The Crown Estate Office
	The Crown Estate Office Suffolk Constabulary

Director

Head of Community & Voluntary Action Rural and Community Housing Enabler

National Landscape Enhancement Officer

Director

Suffolk Preservation Society Suffolk Preservation Society Community Action Suffolk Community Action Suffolk Dedham Vale Society Dedham Vale National Landscape & Stour Valley Suffolk Coast & Heath National Landscape The Theatres Trust East Suffolk Internal Drainage Board Lawson Planning Partnership Ltd James Bailiey Planning Ltd

Appendix 4 – Statutory Consultee Consultation Notice

BRETTENHAM (SUFFOLK) NEIGHBOURHOOD PLAN – PRE-SUBMISSION CONSULTATION (REGULATION 14)

Dear Sir/Madam

As part of the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended), Brettenham Parish Council is undertaking a Pre-Submission Consultation on the Draft Neighbourhood Plan for the Parish. Babergh District Council has provided your details as a body/individual we are required to consult and your views on the Draft Neighbourhood Plan would be welcomed.

The full plan and supporting documents can be viewed here together with information on how to send us your comments.

This Pre-Submission Consultation runs until Friday 8 March 2024.

We look forward to receiving your comments. If possible, please submit them online at https://www.smartsurvey.co.uk/s/BrettenhamNP/ or, if that is not possible, please send them in a reply to this email.

Kind regards

Clerk Brettenham Parish Council

Appendix 5 – Summary of Responses to Consultation Questions

1.	1. Do you have any comments on Chapters 1, 2 and 3?					
Ar	nswer Choices	Response Percent	Response Total			
1	Yes	35.29%	6			
2	No	64.71%	11			
		answered	17			
		skipped	2			

2.	2. Do you support the Vision and Objectives in Chapter 4?					
Aı	nswer Choices	Response Percent	Response Total			
1	Yes	52.94%	9			
2	No	23.53%	4			
3	No opinion	23.53%	4			
		answered	17			
		skipped	2			

3.	3. Do you support Policy BRET 1 – Spatial Strategy?					
A	nswer Choices		Response Percent	Response Total		
1	Yes		58.82%	10		
2	No		11.76%	2		
3	No opinion		29.41%	5		
			answered	17		
			skipped	2		

4.	4. Do you have any other comments on Chapter 5 – Planning Strategy?					
Ar	nswer Choices		Response Percent	Response Total		
1	Yes		25.00%	4		
2	No		75.00%	12		
			answered	16		
			skipped	3		

5. Do you support Policy BRET 2 – Affordable Housing on Rural Exception Sites?

Answer Choices		Respons Percen	-
1	Yes	56.25%	9
2	No	31.25%	5
3	No opinion	12.50%	2
		answere	d 16
		skipped	1 3

6. Do you support Policy BRET 3 – Replacement dwellings and conversion of buildings to residential use outside Settlement Boundaries?

An	Answer Choices		onse cent	Response Total
1	Yes	50.0	00%	8
2	No	31.2	25%	5
3	No opinion	18.	75%	3
		answ	vered	16
		skip	ped	3

7.	7. Do you have any other comments on Chapter 6 - Housing?					
Ar	nswer Choices		Response Percent	Response Total		
1	Yes		25.00%	4		
2	No		75.00%	12		
			answered	16		
			skipped	3		

8.	8. Do you support Policy BRET 4 - Protecting Brettenham's Landscape Character?					
A	Answer Choices		Response Percent	Response Total		
1	Yes		82.35%	14		
2	No		5.88%	1		
3	No opinion		11.76%	2		
			answered	17		
			skipped	2		

9.	9. Do you support Policy BRET 5 - Protection of Important Views?				
A	nswer Choices		Response Percent	Response Total	
1	Yes		62.50%	10	
2	No		18.75%	3	
3	No opinion		18.75%	3	
			answered	16	
			skipped	3	

1(10. Do you support Policy BRET 6 – Biodiversity and Wildlife Corridors?				
Ar	nswer Choices		Response Percent	Response Total	
1	Yes		62.50%	10	
2	No		6.25%	1	
3	No opinion		31.25%	5	
			answered	16	
			skipped	3	

1:	11. Do you support Community Action 1 – Natural Environment Enhancements?				
Ar	nswer Choices		esponse Percent	Response Total	
1	Yes	8	87.50%	14	
2	No		0.00%	0	
3	No opinion	1	12.50%	2	
		ar	nswered	16	
		s	skipped	3	

12	12. Do you support Policy BRET 7 - Local Green Spaces?				
Ar	nswer Choices		Response Percent	Response Total	
1	Yes		81.25%	13	
2	No		0.00%	0	
3	No opinion		18.75%	3	
			answered	16	
			skipped	3	

13. Do you have any other comments on Chapter 7 – Landscape and Natural Environment? Response Response **Answer Choices** Percent Total 1 Yes 6.25% 1 2 No 93.75% 15 answered 16 skipped 3

14	14. Do you support Policy BRET 8 - Buildings of Local Heritage Significance?				
Ar	Answer Choices		Response Total		
1	Yes	56.25%	9		
2	No	18.75%	3		
3	No opinion	25.00%	4		
		answered	16		
		skipped	3		

1	15. Do you support Community Action 2 – Conservation Area Appraisal?				
A	nswer Choices		Response Percent	Response Total	
1	Yes		68.75%	11	
2	No		31.25%	5	
3	No opinion		0.00%	0	
			answered	16	
			skipped	3	

16	16. Do you support Policy BRET 9 – Design Considerations?			
A	nswer Choices	Response Percent	Response Total	
1	Yes	68.75%	11	
2	No	25.00%	4	
3	No opinion	6.25%	1	
		answered	16	
		skipped	3	

17. Do you support Policy BRET 10 - Flooding and Sustainable Drainage? Response Response **Answer Choices** Percent Total 1 Yes 62.50% 10 2 12.50% 2 No 3 No opinion 25.00% 4 answered 16

18	18. Do you support Policy BRET 11 – Dark Skies and Street Lighting?				
Ar	nswer Choices	-	oonse cent	Response Total	
1	Yes	82.3	35%	14	
2	No	11.7	76%	2	
3	No opinion	5.8	8%	1	
		answ	/ered	17	
		skip	ped	2	

skipped

3

19). Do you have any other c	omments on Chapter 8 – Built Environment?		
Ar	nswer Choices		Response Percent	Response Total
1	Yes		7.14%	1
2	No		92.86%	13
			answered	14
			skipped	5

20	20. Do you support Community Action 3 – Broadband?			
A	nswer Choices	Response Percent	Response Total	
1	Yes	81.25%	13	
2	No	0.00%	0	
3	No opinion	18.75%	3	
		answered	16	
		skipped	3	

2:	21. Do you support Policy BRET 12 – Parking Standards?			
Ar	nswer Choices		Response Percent	Response Total
1	Yes		82.35%	14
2	No		5.88%	1
3	No opinion		11.76%	2
			answered	17
			skipped	2

22	22. Do you support Policy BRET 13 - Public Rights of Way?				
Ar	nswer Choices	Respon Perce			
1	Yes	56.25	5% 9		
2	No	31.25	5% 5		
3	No opinion	12.50)% 2		
		answe	ered 16		
		skipp	ed 3		

23	23. Do you support Community Action 4 - Public Rights of Way Network?						
Ar	nswer Choices		Response Percent	Response Total			
1	Yes		56.25%	9			
2	No		25.00%	4			
3	No opinion		18.75%	3			
			answered	16			
			skipped	3			

24	24. Do you support Community Action 5 – Highway Improvements?						
A	nswer Choices	Respor Perce	-				
1	Yes	73.33	% 11				
2	No	20.00	% 3				
3	No opinion	6.679	% 1				
		answei	red 15				
		skippe	ed 4				

25. Do you have any other comments on Chapter 9 – Infrastructure and Highways? Response Response **Answer Choices** Percent Total 1 Yes 6.25% 1 2 No 93.75% 15 answered 16 skipped 3

26	26. Do you support the content of the Policies Map and Inset Map?					
A	nswer Choices	Response Percent	Response Total			
1	Yes		62.50%	10		
2	No		12.50%	2		
3	No opinion		25.00%	4		
		ć	answered	16		
			skipped	3		

27	27. Do you have any comments on the Appendices?					
Ar	nswer Choices	Response Percent	Response Total			
1	Yes		6.25%	1		
2	No		93.75%	15		
			answered	16		
			skipped	3		

28	28. Do you have any other comments on the Draft Neighbourhood Plan?				
Ar	nswer Choices		Response Percent	Response Total	
1	Yes		43.75%	7	
2	No		56.25%	9	
			answered	16	
			skipped	3	

29. Ultimately, the Plan will be subject to a Parish Referendum when residents will be asked whether they want Babergh District Council to use the Neighbourhood Plan to help it decide planning applications. Overall, would you vote in favour of the Neighbourhood Plan at a Parish Referendum?

Ans	swer Choices	Response Percent	e Response Total
1	Yes	55.56%	10
2	No	16.67%	3
3	Unsure	27.78%	5
		answered	18
		skipped	1

Appendix 6 - Responses received to Pre-Submission Consultation, Responses to Comments and Proposed Changes

The tables in this appendix set out the comments that were received during the Pre-Submission Consultation Stage and the responses and changes made to the Plan as a result of the comments. The first table is laid out in Plan order with the general comments following the comments on the policies. Where proposed changes to the Plan are identified, they relate to the Pre-Submission Draft Plan. Due to deletions and additions to the Plan, they may not correlate to the paragraph or policy numbers in the Submission version of the Plan.

NB. Some comments are considered to potentially be of a defamatory nature and have been redacted.

Name	Organisation	Comment	Parish Council Response	Changes to Plan
Chapters 1, 2 ar	nd 3		•	
K Ozficici	Resident	Has the Parish Council reached out to all those land owners and service providers as detailed at 1.7. For local residents there has only been one period of F2F consultation (drop-in event) on Sunday 21st Jan during a pre-arranged function within the village hall. As an attendee, I believe there was a very biased view by the Parish Council in support of the Neighbourhood Plan rather than offering a balanced perspective. The document did not become live until the morning of the drop-in event thus not affording enough time for residents to digest the information.	The drop-in event marked the launch of a consultation period that lasted seven weeks. Every dwelling and known business in the Parish received an information leaflet prior to the drop-in event which identified how to comment. Given that it is the Parish Council's Plan, one would expect such support from those at the drop-in event	None
Pearce	-	2.8 states that the village includes a conservation area of 150 hectares. I feel that the document would benefit greatly from a map detailing the current conservation area and an explanation of what this means in principle for development of current properties and new builds.	The boundary of the Conservation Area will be added to the Policies Maps	Amend Policies Map to include the Conservation Area boundary
L O'Hara	-	1:10 Thought we had left the EU?	The Government has not rescinded regulations relating to strategic environmental	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
			assessment and habitats	
			regulations assessments of	
			plans.	None
		3 as a whole: by not including/taking seriously, whether Brettenham should be classified a a hamlet, this plan deprives residents of a defence against yet more house-building. I raised this matter repeatedly when I wasted my time working on the plan: as usual ignored by	It is not the role of the Neighbourhood Plan to determine its position in the Babergh Local Plan Settlement Hierarchy.	
A Wilson	Parish Council	 Gives clear outline of process in easy to read language, appealing to a wide range of reader, therefore inclusive of all Local colour and context, gives a feeling of belonging and ownership Again, good description of process, avoids officious language, encouraging resident participation 	Noted	None
P Harpley	Edward Harpley Ltd	This is a worthwhile exercise in local democracy and should be used and referred to regularly. It shouldn't be forgotten what the point was in doing this, large developments in small villages are not suitable, not enough infrastructure and too much change to the environment.	Noted	None
G Roberts		 We need to improve what we have but not to damage it either. 1.16 (Settlement hierarchy, joint local plan part 2 expected to commence 2024 and take two years to complete) BABERGH has been working on this since at least 2016 has all that effort and cost now been wasted? 	The 20202 Draft Local Plan identified a Settlement Hierarchy, but this was found to be flawed by Planning Inspectors examining the Plan and Babergh now need to prepare a Part 2 Plan to determine this and the distribution of future growth.	None
	Suffolk County Council	ARCHAEOLOGY It is useful to see a good historic background for Brettenham in section 2.1 – 2.4. This could be enhanced by a search of the Suffolk Historic	This is not considered necessary given the constantly changing	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		Environment Record. The inclusion of an HER search in map format within this chapter would be a useful addition to show all heritage assets (above and below ground) in the area.	map as new records are recorded.	
		MINERALS AND WASTE Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means that SCC makes planning policies and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan,3 adopted in July 2020, which forms part of the Local Development Plan.	Noted	None
		SCC welcomes the Neighbourhood Plan's acknowledgement of our Minerals and Waste Local Plan as part of the local development framework.	Noted	None
		In paragraph 3.7 it is stated that "there are no safeguarded sites within the settlement area". This is true, but we would like to inform the neighbourhood planning group that the settlement does fall within the safeguarding boundary for Anglian Water site AW23 (Brettenham STW). This site can be seen using SCC's Interactive Map of Waste Locations of Interest ⁴ . For a definitive map of safeguarded sites please use the policy map from the minerals and waste local plan.	Noted	None
	Babergh District Council	Contents page: Amend the page number for Chapter 6 Housing	The Contents page will be updated for the Submission Plan	Update Contents page
		Check NPPF paragraph references throughout the plan and supporting documents. While paragraph 3.2 acknowledges the December 2023 update, the references to specific paragraphs within the plan have not been updated.	References to NPPF paragraph numbers will be updated at the time the Submission Plan is prepared.	Update NPPF paragraph numbers
		Paragraph 1.16		

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		There are references made to the 'Babergh Local Plan' throughout the	Paragraph 1.16 will be amended	Amend paragraph
		document when we believe these should refer to the Development Plan or	as suggested	1.16
		the Joint Local Plan. To avoid confusion with the superseded Babergh		
		Local Plan and to ensure accuracy around the Babergh and Mid Suffolk		
		Joint Local Plan progress, the paragraphs should be amended as follows:		
		Paragraph 1.16: 'The planning policies will supplement, rather than		
		repeat, adopted planning policies in the Babergh Local Development		
		Plan. Part 1 of a <u>the</u> Joint Local Plan for Babergh and Mid Suffolk Councils		
		was adopted in November 2023 and work on Part 2, dealing with the		
		district settlement hierarchy, housing distribution and site allocations, <u>is</u>		
		underway and is likely to be complete by 2025. is expected to commence		
		in 2024 and take two years to complete.'		
		Paragraph 2.1	The format of paragraph 2.1 will	Review paragraph 2.1
		Check the font size	be reviewed	font
		Paragraph 2.5		
		In the second sentence: 'In 2021, the parish usual ly resident population was'	Paragraph 2.5 will be amended	Amend paragraph 2.5
		Paragraph 3.4: 'At a more local level, the Neighbourhood Plan has been prepared in the context of the current Babergh <u>Development Local</u> Plan, which comprises the Babergh and Mid Suffolk Joint Local Plan – Part 1, adopted in November 2023'	Paragraph 3.4 will be amended	Amend paragraph 3.4
		Paragraph 3.6: 'A Joint Local Plan – Part 2 is planned to be <u>being</u> prepared that will <u>is likely to</u> identify a settlement hierarchy for the two districts, the distribution of any further housing growth and identify any sites required to meet that growth. At the time of preparing the Neighbourhood Plan, work had yet to commence on this local plan document.'	Paragraph 3.6 will be amended and updated	Amend and update paragraph 3.4

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		[Note: the councils have been working on the Part 2 Joint Local Plan since November 2023]		
Vision and Ob	ectives			
K Ozficici	Resident	To note - The area covered by the plan, particularly outlined in Map 1 (735 Hectares), is extensive and covers a large area of the parish. However, Map 3 within the Plan details the Settlement Area which covers a fraction of this parish. From our understanding this is the only area where we would expect to accept and see growth. We would welcome an inclusive and broader view to include areas other than just the main street, which is already the main congested dwelling area within the village. The No.1 and 2 Objectives (Housing), is extremely limiting and does not meet the needs of the local community as expressed as part of the vision.	The Neighbourhood Plan covers the whole parish but, in accordance with the strategic policies of the Local Plan, a Settlement Boundary is drawn around the main built-up areas. This is to limit opportunities for significant housing growth but it would not preclude the delivery of affordable housing to meet identified local needs in accordance with Policy BRET 2.	None
L O'Hara	-	Housing 2: needs as defined by who? So vague as to be useless	Noted	None
T Tavener	-	I broadly support the goals of maintaining the rural character and rural identity of the village, particularly through restricting inappropriately sited development such as the new houses in Brettenham Park. However I also believe that we have to move with the times when it comes to design and building materials, especially when it comes to making houses more efficient, environmentally friendly and lower maintenance.	The Plan does not preclude making any new houses more efficient, environmentally friendly and lower maintenance	None
A Tavener	-	8. By all means reduce impact of traffic but not with more street furniture or a reduction in the 30 mph speed limit. Many years ago it was suggested that a 30 roundel should be painted on the road at the beginning of the speed limit area. This might have a useful impact.	Noted	None
A Wilson	Parish Council	 Built Environment and Design 6. In recognising and protecting the historic importance of buildings etc, there should be a balance between practical/financial consideration and retaining the integrity of historic features in question. 	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
P Knight	-	Objective 2 - as there is no assessment of local housing need, how can it	Ultimately the housing need for	None
		can be determined whether any housing development will meet that	Brettenham will be determined	
		need?	in the Part 2 Joint Local Plan.	
G Moulding	-	Objective 8 mis-spelt Brettenham	The spelling will be corrected	Correct spelling in Objective 8
Anonymous	-	Support the vision and objectives	Noted	None
G Roberts		I have recently had a meeting with a bmsd councillor who made it very clear that it is essential that the Brettenham local plan should specifically identify areas where we consider development appropriate and those areas that we do not, 'under any circumstances'	Such an approach would be contrary with the National Planning Policy Framework and would mean that the Plan would not survive examination.	None
	Suffolk County Council	SCC is pleased to see that protecting the historic environment has been included in the Vision for Brettenham in section 4.1 and in the objectives to achieve this vision.	Noted	None
Policy BRET 1 -	Spatial Strategy			
K Ozficici	Resident	A broader perspective of the parish area for development and not limited to the current proposed Settlement area.	The Neighbourhood Plan Residents' Survey results do not indicate an overwhelming support for further development in the countryside	None
L O'Hara	-	6:6/6:7 I find the removal here of stipulation as to which sites we do not want building on disgraceful. Especially as, when I worked on the plan, I found numerous instances from elsewhere that because certain sites were not ruled out, builders gratefully used that fact as an argument in favour of building, and will do so again. I raised this matter repeatedly when I wasted my time working on the plan: as usual ignored byI only say it again now for historical reference. The original (gutted) Policy BR3 had such a list	Such an approach would be contrary with the National Planning Policy Framework and would mean that the Plan would not survive examination. The sites put forward are all outside the Settlement Boundary. The identification of specific sites where development is not wanted would infer that	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
			development on other sites is	
			supported.	
T Tavener	-	I agree that no further major housing development should take place	Development within the	None
		outside the settlement boundary. It does concern me though that by trying	Settlement Boundary would still	
		to restrict most small scale development to within this boundary, The	have to have regard to the	
		Street in Brettenham will just become a continuous line of houses with	character of the area and the	
		tiny gardens as the old cottage gardens are all being built on.	amenity of residents, such as	
			overlooking.	
G Roberts		I have recently had a meeting with a bmsd councillor who made it very	Such an approach would be	None
		clear that it is essential that the Brettenham local plan should specifically	contrary with the National	
		identify areas where we consider development appropriate and those	Planning Policy Framework and	
		areas that we do not, 'under any circumstances'	would mean that the Plan would	
			not survive examination.	
Chapter 5 – Plan	nning Strategy			
Pearce	-	As stated previously, I feel that the document would benefit greatly from a	The Policies Map will be	Amend Policies Map
		map detailing the current conservation area and an explanation of what	amended to include the	to include the
		this means in principle for planning strategy.	Conservation Area boundary	Conservation Area
L O'Hara	_	I find the support for new development in principle (5:7) contradicts the	The Plan has to be in conformity	boundary None
	-	residents survey and any meaningful protection.	with the NPPF and strategic	None
		residents survey and any meaningful protection.	policies of the Local Plan. Policy	
			SP03 of the Local Plan supports	
			the principle of development	
			within the settlement	
			boundaries and the NP cannot	
			go against this.	
G Moulding	-	5.5 Out of date settlement boundaries, suggests defining a new	Given the status of the Joint	Amend Paragraph 5.5
		settlement boundary at School corner. But cannot see a map defining the	Local Plan Part 2 it has been	to remove reference
		extent of this new settlement area.	decided not to define a	to Settlement
			Settlement Boundary at School	Boundary at School
				Corner.

Name	Organisation	Comment	Parish Council Response	Changes to Plan
			Corner. Paragraph 5.5 will be	
			amended.	
G Roberts		5.1 Context	Noted	None
		Very topical point, in particular with the current planning application at 39		
		The Street. As the Parish council and many neighbours objected to this		
		application, on this context, it will be enlightening to receive bmsd		
		verdict! 'Jury's out'		
	Babergh District	The Joint Local Plan Part 1 does not set a spatial strategy. For this reason,	Paragraph 5.1 will be amended	Amend Paragraph 5.1
	Council	the second sentence of paragraph 5.1 should be deleted.		with reference to
				Local Plan spatial
				strategy
	 Affordable Housing 	on Rural Exception Sites		L
L O'Hara	-	I support affordable housing, but not this policy	Noted	None
		1. It should not be up to Babergh to decide who lives here		
		2. It should all be affordable housing: there are enough private dwellings		
NT		3. Who would run it?	Neted	News
N Tavener	-	I cannot see how this could possibly ever arise in Brettenham	Noted	None
A Tavener	-	Not relevant to Brettenham now and unlikely to be in the future.	Noted	None
M Kelly	-	I feel that housing of this nature should be contained within the	Paragraph 6.9 explains that land	None
		settlement boundary, why should there be an exception for this type of	outside the settlement boundary	
		housing?	has no "market" development	
			value, thereby reducing the land value and enabling a viable	
			affordable housing scheme.	
G Moulding		Rather than suggesting changes, question how affordable housing would	A housing needs survey would	None
Orioutunig		operate in a village where there is no public transport, no schools, no	be required to demonstrate a	
		shops, no post office or other services and indeed limited employment	need for those that have to live in	
		opportunities for low income families.	the village, for example due to	
			working in education, but cannot	
			afford to buy at market prices.	

Name	Organisation	Comment	Parish Council Response	Changes to Plan
Anonymous	-	I do support it but I am not sure it goes far enough to clearly state areas for affordable housing and any meaningful actions that will encourage any affordable housing to be built. It is a travesty that the brownfield site of the scrapyard was not used to build affordable housing or at least building smaller houses, closer to entry homes or family homes.	Noted. Paragraph 6.9 explains the mechanism.	None
	Babergh District Council	This policy is similar to policy LWL6 found in the recently examined Lawshall Neighbourhood Plan. The Exam Report can be read here – see page 19 onwards. As per the examiner's suggestions in the case of Lawshall, we suggest the following amendments to the policy to ensure that is aligned with district policy and recent updates to the NPPF (notably paragraph 72) around rural exception sites and exception sites for community-led development. The first paragraph should be amended to read: 'Proposals for the development of small-scale affordable housing schemes, including entry level homes for purchase (as defined by paragraph 72 of the NPPF) on rural exception sites outside <u>but well</u> <u>connected to an existing settlement, the Settlement Boundary</u> , 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:' criterion iii. Should be amended to read: 'iii. Is offered, in the first instance, to people with a demonstrated local connection, as defined by the Babergh District Council Choice Based Lettings Scheme. Where a property cannot be filled from within the parish <u>it there is no need, a property</u> should then be offered to those with a demonstrated need for affordable housing in neighbouring villages <u>and</u> thereafter to the rest of Babergh District	The policy will be amended accordingly	Amend Policy BRET2 as suggested by Babergh DC

Name	Organisation	Comment	Parish Council Response	Changes to Plan
Policy BRET 3 -	- Replacement dwel	lings and conversion of buildings to residential use outside Settlement Bou	ndaries	
L O'Hara	-	 Although I partly approve of this, important elements gutted from the original plan should be in here: 1) That there should be no extra pressure on the village drainage system 2) Especially important as the current Parish Council just loves approving the chopping down of trees: that where development approval i granted within the conservation area with trees remaining, developers should not subsequently remove those trees, and if they do remedial/punitive action should swiftly occur 	Noted The Parish Council is not the decision making body when it comes to planning applications	None
N Tavener	-	If a building is being replaced, it will probably be because it is of poor quality (for example impossible to insulate) and design and/or too small for practical use. Within reason there should be no restriction on the size of or siting within the original plot of a replacement dwelling. Owners will otherwise be disincentivised from replacing substandard housing	The policy only applies to the countryside outside the Settlement Boundaries where a significantly larger replacement dwelling could have a significant detrimental impact on the countryside landscape within which it sits	None
T Tavener	-	Replacement dwellings should be allowed to be moved to wherever is appropriate within the proposed new plot boundary. If a replacement dwelling is being built is is probably because the old one is too small and of a poor layout. If, for example, someone buys a piece of land at the back of the plot, why should they then still have a house right on the roadside or crammed onto the edge of the plot just because that is where the old house happened to be. It might be beneficial to the privacy of the neighbours as well as the new house to move it within the plot. Restricting the new dwelling to the same footprint as the old one also makes no sense to me. It makes more sense to say you can only replace a dwelling with another single dwelling and leave the restrictions at that - this would	The policy only applies to the countryside outside the Settlement Boundaries where a significantly larger replacement dwelling could have a significant detrimental impact on the countryside landscape within which it sits	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		prevent anyone buying redundant houses and then building multiple		
		houses on the same plot.		
A Tavener	-	Whether or not an existing house is replaced by a larger dwelling should	The policy only applies to the	None
		be assessed on an individual basis, and taking into account the size of the	countryside outside the	
		plot, rather than a blanket ruling. Re the footprint, in some cases it might	Settlement Boundaries where a	
		make sense to set a new dwelling in a different position from the original	significantly larger replacement	
		to improve the location of the dwelling.	dwelling could have a significant	
			detrimental impact on the	
			countryside landscape within	
			which it sits	
G Moulding	-	Agree with the main aspect, but would question the last sentence,	The policy only applies to the	None
		increase in plot size to form additional garden, parking or amenity land	countryside outside the	
		will not be supported. Why would we not support this?	Settlement Boundaries and such	
			extensions would mean the plot extending further into the	
			countryside.	
Anonymous		There should be more restrictions on people being allowed to excessively	A local Plan policy already	None
Anonymous		extend their houses, as this further reduces the variety of smaller houses	covers this matter	None
		available.		
	Suffolk County	Policy BRET 3 covers conversion of buildings to residential use; we would	The requirement for a heritage	None
	Council	recommend adding that proposals for the conversion of historic	statement would be addressed	
		agricultural buildings should be accompanied by a heritage statement	by policies relating to designated	
		including internal and external photographs.	heritage assets.	
		SCC Archaeological Service have been reviewing Farmsteads throughout	Noted	None
		Suffolk, as part of a project funded by Historic England. Entries from the		
		project can be seen via the Suffolk Heritage Explorer ¹ . The Neighbourhood		
		Planning group may wish to consider whether the information from the		
		Suffolk Farmsteads Project would help with Policy BRET 3 concerning		
		conversion of rural buildings some of which could be non-designated		
		heritage assets/buildings of local heritage significance.		

Name	Organisation	Comment	Parish Council Response	Changes to Plan
	Babergh District Council	Should refer consistently to 'settlement boundaries' (plural) – see also paragraph 6.19	The reference to settlement boundaries will be addressed	Ensure consistent reference to settlement boundaries
				boundaries
Chapter 6 – Ho	using		1	I
L O'Hara	-	As might be expected, this Housing Policy omits residents survey opposition to housing clusters of 6-10 (0% support).	The Neighbourhood Plan does not support the development of clusters of housing	None
N Tavener	-	See comments on Policy BRET 3	Noted	None
M Kelly	-	This all sounds good in principle, however having seen a scheme like this in action elsewhere ,it often leads to people being "parachuted" into a village, merely to take up the offer of accommodation, often with no local links and no interest in their surroundings.	For affordable housing on exception sites, the first priority is for those with a local connection	None
C Clarke	-	Any development of replacement dwellings and conversion of buildings should reflect the local character of Brettenham housing	This is addressed elsewhere in the Plan	None
Anonymous	-	There is no mention of the requirement for smaller homes within Brettenham to encourage families or allow young people growing up in the village to stay in the village. In recent years almost all the homes built have been 4 bedroom houses, mainly bought by 2 people, which is a waste of space and is not helping to create a diverse community.	Policy BRET 2 enables the development of housing to meet locally identified needs	None
	Babergh District Council	The third criterion of paragraph 6.10 should be amended as: 'registered social landlord (housing association <u>) or a Community-led</u> <u>Development Organisation such as a Community Land Trust</u> , willing to work with the Parish Council and District Council to fund and manage a scheme'	The paragraph will be amended as suggested	Amend paras 6.10, 6.11 and 6.12 as suggested by Babergh DC
		Paragraph 6.11 should be amended as: 'A <u>local</u> housing needs survey has not been carried out in Brettenham, but having a planning policy in place does facilitate the exploration of <u>an</u> <u>exception site</u> scheme at any point in the future'	The paragraph will be amended as suggested	

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		Paragraph 6.12: 'Joint Local Plan Policy LP07 - Community-led and rural exception housing, provides limited guidance on the delivery of affordable housing on a rural exception site, stating that it will be permitted where it is "well- connected to an existing settlement and proportionate in size to it". The Joint Local Plan also acknowledges that, in accordance with national policy, an element of market housing on a site might be necessary in order to make the delivery of the affordable housing viable. Given the limited Joint Local Plan policy guidance, the Neighbourhood Plan provides more detail as to how such an affordable housing scheme would be considered.'	The paragraph will be amended as suggested	
L O'Hara	- -	m's Landscape Character Bret 4 i)that characteristics "have informed the design of the proposal" empty meaningless waffle. Has Starmer been moonlighting again?	Noted	None
T Tavener	-	I support the aims of this policy but it should already be achievable through existing planning regulations. Planning applications are already incredibly expensive with requirements for Heritage Reports, Highways Assessments, Structural Surveys, Ecology Reports etc before even submitting an application. Adding a Landscape and Visual impact Assessment will only add further expense.	Such an appraisal would only be required in those instances where a proposal is located outside a Settlement Boundary	None
G Roberts		Unfortunately developers promise the world to get planning approval including unrealistic unaffordable landscape proposals, only to be ammended and discharged once approval is granted and released of obligation by bmsdc. The landscaping and boundary details of an approved application are as important to the overall project and should not be allowed to be dismissed so easily and regularly as is the current trend.	Noted	None
	Anglian Water	Anglian Water supports the policy and prioritising the delivery of biodiversity net gains within the neighbourhood planning area to support habitat recovery and enhancements within existing green infrastructure. We would also support opportunities to maximise green infrastructure	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		connectivity including through opportunities to minimise surface water run-off from existing urban areas through the creation of rain gardens for example.		
		As the neighbourhood plan progresses, there may also be benefit in referencing the emerging Suffolk Local Nature Recovery Strategy (Local Nature Recovery Strategy (LNRS) - Suffolk County Council) which will identify priority actions for nature and map specific areas for improving habitats for nature recovery.	Noted. This appears to be some way off being published	None
	Babergh District Council	To ensure the policy has longevity, point ii. should read: 'having regard to the Joint Babergh and Mid Suffolk Landscape Guidance 2015 <u>or any</u> <u>successor documents</u> '	The policy will be amended as suggested	Amend policy as suggested by Babergh DC
Policy BRET 5	- Protection of Import	ant Views		
Pearce	-	I feel that you have omitted an important view from your policies map. Although you have considered the view (no. 9) SW from Church Farm, I would argue a more important view is seen from the rear gardens of the houses on The Street, SE looking across in the direction of Bloxhall Grove. I believe the importance of this view was mentioned on a number of responses in 2021 Residents Survey.	Important views can only be from publicly accessible locations.	None
L O'Hara	-	The map/lists deliberately vague, omitting certain views where atrocious planning applications have been granted. As it stands, the Important Views Section is not fit for positive purposes, but obviously useful for obfuscation purposes: ideally there would be a proper list, and explanations of to why certain views have been excluded. But won't happen, will it?		
A Tavener	-	This would add more expense to planning applications which are already very expensive.	Such matters should be considered in preparing planning applications as a matter of course	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
G Roberts		I support this policy, although would point out that there are very many fine views around the village and doubt that all could be listed or agreed upon.	Important views can only be from publicly accessible locations. Further, views out of the Parish cannot be designated as we cannot influence what happens outside the Parish.	None
	Suffolk County Council	Policy BRET 5 - Protection of Important Views The Neighbourhood Plan identifies 13 Important Views, anchored in Policy BRET5, and shown on Map 4 Important Views (with numbers) and on the Policies Map (without numbers). It may be useful to list the numbered views in the policy to provide further clarity to the reader.	This is not considered necessary	None
		Important views have been suitably assessed, with location map, identification number, title, short description and photo, and justified, through the Key Views Assessment supporting document available on the parish website, which is welcomed by SCC. All views appear to be publicly accessible.	Noted	None
Policy BRET 6 -	Biodiversity and Wil	dlife Corridors		
L O'Hara	-	I say no not because I don't support biodiversity/tree support etc, but because it is quite evident the Parish Council doesn't, or isn't willing to act against breacheseg the wholesale massacre of trees by Church Farm. Not a word said.	The Parish Council is not the local planning authority. Planning breaches should be taken up with Babergh DC	None
G Roberts		 From what I have experienced with the DLL GCN licence. Which is a knee jerk reaction by the government to speeding up development projects. Allowing for the destruction of sites and protected species, by paying for a DLL licence granted on a inaccurate and misleading preliminary ecological assessment. Digging a shallow pond on a farm in Kings Lynn by no means reduces the extent of the impact. If they can't be left to thrive in an amber zone for 	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		great crested newts, a conservation area and remote hamlet 'Brettenham'		
		who's kidding who here?		
	Suffolk Wildlife	We are pleased to see that the draft Brettenham Neighbourhood Plan	Noted	None
	Trust	recognises the importance of biodiversity and greenspaces and proposes		
		measures to protect and enhance these within Policies BRET 6 and		
		Community Action 1. We believe that these policies could be		
		strengthened to offer an even greater benefit to biodiversity. Please see		
		our comments below:		
		Biodiversity and Wildlife Corridors	Noted. The Plan will be amended	Amend Para 7.11 to
		Suffolk Wildlife Trust note that Paragraph 7.11 states that, "there are no	to reference the County Wildlife	note that there are
		defined nature conservation sites within the parish." However, four	Sites presence.	County Wildlife Sites
		County Wildlife Sites (CWSs) lie wholly or partly within the parish. These		wholly or partly within
		are Rattlesden Airfield, Ram's Wood, Morieux Wood, and Knightshill Grove		the Parish.
		CWSs. Paragraph 185 of the National Planning Policy Framework (NPPF)		
		states that such sites should be referenced and mapped within plans; it is		
		therefore our recommendation that this update be undertaken. Further		
		detail on these, including their location, can be obtained from Suffolk		
		Biodiversity Information Service ¹ .		
		Further consideration could also be given to Priority Habitats, such	This is not considered	None
		habitats in the parish include deciduous woodland, good quality semi-	necessary. Appendix A already	
		improved grassland, and traditional orchards, as well as a number of	identifies the priority habitats	
		hedgerows. The plan could provide an opportunity to identify that these		
		habitats, along with CWSs, could provide a blueprint of how ecological		
		networks in the parish could be enhanced, this would reference the		
		requirement to, "promote the conservation, restoration and enhancement		
		of priority habitats, ecological networks and the protection and recovery		
		of priority species; and identify and pursue opportunities for securing		
		measurable net gains for biodiversity" detailed within the NPPF ² . This		
		provides links to Point D) of BRET 6.		

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Name	Organisation	Comment	Parish Council Response	Changes to Plan
		42021:2022 Integral nest boxes. Selection and installation for new		
		developments ⁷ . Bat boxes should be suitably installed, with consideration		
		to avoid illuminated areas and areas above doors or windows, boxes		
		should be at least 3m high and face a range of aspects to allow use during		
		different weather conditions.		
	Suffolk County Council	Overall, this is a strong policy. Reference could be made to legal requirements with regards to BNG, the statutory Biodiversity metric, and it could be more clearly defined what the parish would consider 'measurable'.	Noted. It is not the role of the Parish Council to determine what is "measurable" but the local planning authority. The	Amend policy to reflect the requirement for specified
			policy will be brought up-to-date to reflect the new statutory requirements introduced since the Draft Plan was published.	development to deliver biodiversity net gain
		Apart from the policy title there is no explicit further reference to wildlife	The policy will be amended as	Amend the final
		corridors, although some of the named features could be part of one. The policy therefore could be strengthened as follows:	suggested	element of the policy as suggested
		"d) restoring and repairing fragmented wildlife networks <u>and corridors</u> ."		
	Babergh District Council	Criteria ii) should read 'suitable <u>compensation</u> mitigation measures, that provide better replacement'	The policy will be amended	Amend criterion as suggested
		This should be compensation rather than mitigation, as it refers to replacement of habitat, rather than minimising impacts on it.		
		Our Biodiversity Officer has suggested that within the list of examples for		News
		net gain, including 'creation of habitats', especially first on the list, could inadvertently suggest that the parish puts a higher priority on the creation new habitats than retaining and enhancing the existing.	Noted. It is considered that the policy is clear in its expectations but will be amended to provide greater clarity	None
		It is also worth noting that the installation of bird and bat boxes are excluded from the Biodiversity Net Gain metric and therefore would not contribute to measurable gains.	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
Community Act	ion 1 – Natural Envir	ronment Enhancements		
L O'Hara	-	Good luck with that	Noted	None
T Tavener	-	Recent community involvement in management of the verges has resulted in the widespread planting of non-native and cultivated varieties of daffodils which in my view look out of place and detract from the rural character of the village, particularly when done outside the centre of the settlement, whilst native snowdrops have been removed by some individuals to be transplanted into gardens. Any further work should be done in consultation with an organisation like FWAG or Suffolk Wildlife Trust and the adjoining property owners.	Noted	None
M Kelly	-	Easier said than done, there is no respect for grass verges throughout the village, motorists just treat them as an extension of the road, you only have to look at the current state of them.	Noted	None
Anonymous	-	Would be good to see some further detail of these actions	This detail will be worked up by the Parish Council outside the preparation of the Plan	None
G Roberts		Manage grass verges to benefit and enhance biodiversity What you actually mean is Babergh does not have the money or inclination to cut the verges. Which is extremely dangerous for traffic and pedestrians on our narrow winding roads.	Babergh DC are not responsible for cutting highway verges	None
	Suffolk Wildlife Trust	Suffolk Wildlife Trust welcome this action. Where natural and semi- natural habitats are created there could be scope for advice to be sought from Suffolk Wildlife Trust, and we urge the Parish Council to reach out to us should they be interested in this. Local provenance of the planting trees is frequently noted as important, and we also note that species selection is also important. Selecting species already occurring within the area will provide landscape continuity and support local wildlife. Another way to deliver this is using natural regeneration, whereby areas of scrub area allowed to mature	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		naturally, ensuring local provenance and species continuity, while also		
		reducing maintenance costs and upkeep. Wider community actions could		
		also be considered to promote biodiversity in the parish.		
	Suffolk County Council	SCC welcomes this Community Action.	Noted	None
Policy BRET 7 ·	· Local Green Spaces			
G Roberts		 Triangle of land outside the church, soon to be a round about, if the heavy lorries continue to cut the corners up. Playground very important and not to be developed on. Cemetery! not sure how this could be lost. 	Noted	None
	Anglian Water	The policy designates 3no. areas of Local Green Spaces (LGS) within the neighbourhood plan area. It is noted that the supporting text states that the development is restricted to that which has to be demonstrated as being essential for the site, in line with the 2024 version of the National Planning Policy Framework (NPPF). The policy is explicit that manging development within a LGS should be consistent with national policy for Green Belts as set out in paragraphs 104 – 107 of the NPPF.	Noted	None
		We agree the Policy provides scope for Anglian Water to undertake operational development to maintain and repair any underground network assets that may be within these areas, such as mains water pipes, which would be consistent with the policy tests.	Noted	None
	Suffolk County Council	SCC welcomes the designation of the three Local Green Spaces, shown on the Policies Map, and the reference to the NPPF (paragraph 106) - as this supports the ongoing work to make Suffolk the Greenest County ⁵ . Given the woodlands within the parish, some in close proximity to settlement clusters and not to expansive, there may have been further opportunities for Local Green Space designations.	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		The Local Green Space Assessment is presented as supporting document on the parish website, providing clear evidence through maps and tabular description, but no photos. The descriptions do provide sizes of the proposed Local Green Space.	Noted	None
		All sites proposed for designation appear to fulfil the NPPF criteria, which is welcomed.	Noted	None
Chapter 7 – Lan	dscape and Natural	Environment		
P Knight	-	It's disappointing that there is no reference to enhancing access to the countryside beyond existing rights of way network. There are significant areas of land where there is no access and yet which would enhance people's enjoyment of the countryside in and around the village. Furthermore a firm commitment to extending the hedgerow network to provide more extensive and joined-up wildlife corridors would be a welcome addition.	These are reliant upon landowners both agreeing to access and/or agreeing to plant additional hedgerows.	None
G Roberts		I also read Policy Brett 4 ii The joint Babergh and Mid Suffolk landscape guidence 2015. As I thought it might help in understanding this chapter, which made it as clear as mud.	Noted	None
	Suffolk County Council	Biodiversity Paragraph 7.16 of the plan may need updating as Biodiversity Net Gain (BNG) came into force on 12 February 2024, at least for some developments. It is welcome to see the Mitigation Hierarchy presented prominently as in Figure 3.	The Plan will be updated to reflect the implementation of BNG regulations	Update reference to the BNG regulations being implemented early in 2024
	Babergh District Council	Paragraphs 7.1 – 7.7 – check font size Paragraph 7.2 Our biodiversity officer has recommended including details of County Wildlife Sites (CWS) and hedgerows to further support the importance of	Noted Reference to the County Wildlife Sites will be added	Amend font size in pars 7.1 – 7.7

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		ecological assets – this could be incorporated into paragraph 7.2 and		Amend para 7.11 to
		potentially added to the map in Appendix A. There are four CWS that are		included reference to
		wholly or partially located within the parish and two that abut the parish		County Wildlife Sites
		boundary. Information on both CWS and hedgerows is available through		
		the Suffolk Biodiversity Information Service (SBIS)		
		A map of the CWS is available here:		
		https://www.suffolkbis.org.uk/sites/default/files/images/other/PS2_0.jpeg		
		Paragraph 7.16	The Plan will be updated to	
		To ensure the plan is as up to date as possible, the final sentence should	reflect the implementation of	
		be amended as follows:	BNG regulations	Update reference to
		'While the Environment Act 2021 sets out the core components (from the		the BNG regulations
		use of a metric, a system of national credits, a register of net gain and		being implemented
		more), the details of how biodiversity net gain will work are still in		early in 2024
		development. at the time of preparing this Plan, still in development		
		ahead of the requirement becoming mandatory later in 2024.		
		Figure 3		
		Our Biodiversity Officer has recommended that the word 'evade' is	Figure 3 will be amended as	
		replaced with the word 'avoid' in the first box to ensure clarity.	suggested	
				Amend Figure 3 to
				replace evade with
		Paragraph 7.19		avoid
		This section is titled 'Protected Open Spaces' but then refers exclusively	The section title will be amended	
		to local green spaces, for clarity, the section should be renamed 'Local		
		Green Spaces'		Amend section title to
				Local Green Spaces
Policy BRET 8	- Buildings of Local H	Heritage Significance		
K Ozficici	Resident	The buildings listed within the Plan are not, in our view, of particular	Appendix B identifies the	None
		significance. There are several significant Grade 2 listed buildings, which	statutory listed buildings	
		are not detailed within the Plan.		

Name	Organisation	Comment	Parish Council Response	Changes to Plan
L O'Hara	-	There were far more buildings than these pitiful few originally: so I would	Noted	None
		like the original (gutted) list to be restored. Won't happen though will it?		
A Tavener	-	There is already adequate protection through planning legislation.	Planning legislation applies to listed buildings. Buildings of local significance are covered by the NPPF but such buildings need to be identified first	None
A Wilson	Parish Council	Cognisance should be given to residents' views on non heritage assets, bearing in mind potential changes to rules in the future that may adversely affect them due to their properties being flagged as of local heritage significance.	Noted	None
Community Ac	tion 2 – Conservatio	n Area Appraisal		
T Tavener	-	I do not support the expansion of the conservation area. If these areas are considered beautiful and special, presumably that is because they are already being managed correctly - why add an unnecessary layer of bureaucracy and interfere in the way people manage their own property? Roadside tree and hedge maintenance is already generally very poor, to the extent that they often pose a traffic hazard, especially to lorries and farm machinery, this proposal would make the situation more complicated.	The Community Action does not propose the expansion of the Conservation Area but updating the Babergh Appraisal to include the findings of the work carried out by the Parish Council NB – where is this work? I do not feel we can keep referring to this unless the character areas work is published .	None
A Tavener	-	NO. The conservation area should be restricted to the main core of the	The Community Action does not	None
		village. The proposal covers long areas of the village where there are no houses at all, and would result in the entire village being covered.	propose the expansion of the Conservation Area but updating	

Name	Organisation	Comment	Parish Council Response	Changes to Plan
			the Babergh Appraisal to include the findings of the work carried out by the Parish Council	
M Kelly	-	Having recently bought a house in a location which has now been identified as being in the " Conservation Area Appraisal " zone, this worries me somewhat. The house needs some remedial work and improvement, whilst not wishing to change the character of the house, I am worried that we will be constrained in what we do and will also suffer extra financial outlay in justifying works that we intend to carry out. Also, there is no real definition given of the consequences of being designated in a Conservation area.	The Community Action does not propose the expansion of the Conservation Area but updating the Babergh Appraisal to include the findings of the work carried out by the Parish Council	None
G Moulding	-	Yes we support a review of the conservation area, but do not understand why this has to extend to what it appears to be; the whole village. If we have listed buildings and heritage assets in areas outside the current conservation area, is this not enough to provide protection to those properties.	The Community Action does not propose the expansion of the Conservation Area but updating the Babergh Appraisal to include the findings of the work carried out by the Parish Council	None
G Roberts		Designated conservation areas are already rare commodities should have full protection against any further development and not reappraised to identify any possible weaknesses so that more development can be shoehorned in.	Historic England recommend that Conservation Area Appraisals and Management Plans are prepared by District Councils to better understand their significance and opportunities for improvement.	None
Policy BRET 9 –	Design Considerati	ons		
K Ozficici	Resident	We would welcome more non-traditional styles such as modern and contemporary dwellings.	Noted	None
L O'Hara	-	This is a pale skeletal shadow of the original policy BR5: which I would like reinstated in its entirety. As it stands, far too many builder loop-holes,	The policy originally drafted was overly complex and would be unlikely to survive examination	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		. I raised this matter repeatedly when I		
		wasted my time working on the plan: as usual ignored		
T Tavener	-	I agree with the general principles but reiterate that I think we should be	The policy does not preclude the	None
		embracing new building materials. Why insist on new houses having	use of new materials	
		modern wooden windows and bargeboards etc, which will generally be		
		made of poor quality softwood and become an ongoing maintenance		
		issue, when better modern alternatives are available?		
A Tavener	-	There is no reason why modern materials and building methods should	The policy does not preclude the	None
		not be used where appropriate. We should not be living in a time warp. If	use of new materials	
		we were building a house from scratch now would we use wood and		
		straw? Provided the materials used are in harmony with the existing		
		dwelling they should be allowed. For example UPVC and aluminium		
		windows can be designed to look very similar to wood - which has a		
		relatively short life span and requires constant maintenance.		
P Knight	-	The policy appears to exclude the potential for any innovative design, with	The policy does not preclude the	None
		an assumption that any development that is "different" will be to the	use of new materials	
		detriment of the village. Innovative design could also make a considerable		
		contribution to the aspiration for "sustainable development" in the village.		
G Roberts		Great concept but as I have said earlier this will only work if Babergh stuck	Noted	None
		to the approved plan and did not allow amendments and discharge of		
		conditions, following planning consent.		
	Anglian Water	As a region identified as seriously water stressed we encourage plans to	Noted	None
		include measures to improve water efficiency of new development		
		through water efficient fixtures and fittings, including through		
		rainwater/storm water harvesting and reuse, and greywater recycling.		
		Our revised draft water resources management plan (WRMP) for 2025-	Noted	None
		2050 identifies key challenges of population growth, climate change, and		
		the need to protect sensitive environments by reducing abstraction.		

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		Managing the demand for water is therefore an important aspect of maintaining future supplies.	Joint Local Plan Policy LP 26	None
		The Defra Integrated Plan for Water supports the need to improve water efficiency and the Government's Environment Improvement Plan sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (<i>l</i> /p/d) where there is a clear local need, such as in areas of serious water stress. Given the proposed national approach to water efficiency, Anglian Water would encourage this standard to be included in the neighbourhood plan using a fittings-based approach.	'water resources and infrastructure' already requires the use of appropriate water efficiency measures and it is not necessary to repeat this in the Neighbourhood Plan	
	Suffolk County Council	Policy BRET9 could usefully reference Suffolk Design: Streets Guide ⁷ with regard to street layouts for any new development.	Given the nature of development proposed in Brettenham (infill plots), it is not expected that new streets will be constructed.	None
		Point g) of BRET9 (cycle storage) should quote Suffolk Guidance for Parking (2023, or any successor document) ⁸ rather than 'Suffolk Parking Guidelines'.	The reference will be amended	Amend reference to Suffolk Guidance for Parking
Policy BRFT 10	- Flooding and Susta	inable Drainage		
Pearce	-	I feel that this policy needs to address discharging water and sewage from new developments into existing ditches. A number of the properties on The Street discharge into a ditch/underground pipe which runs from the Church down to the Old Post Office, before crossing under the road, through the adjacent field and terminating in a large ditch near woodland. This ditch is currently close to capacity and has overfilled into gardens during the recent heavy rainfall. New developments could exacerbate this and would therefore need to detail what measures they would take to upgrade the existing system or propose alternative drainage solutions.	The policy requires proposals to submit schemes detailing how on-site surface water drainage will be managed	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
L O'Hara	-	While ok as far as it goes, tinkering around the edges :a root and branch renovation of Brettenham's entire drainage system, funded by a levy on all new developers, should be a priority.	Community Infrastructure Levy from new developments could enable this but will require a significant level of new housing to fully fund it	None
	Anglian Water	It is welcomed that this policy seeks to ensure new development incorporates sustainable drainage schemes (SuDS), providing for on-site drainage and water resources to be managed to avoid surface water and fluvial flooding issues. These can provide multi-functional benefits when designed to be integral to green/ blue infrastructure provision. SuDS also provide an opportunity for rainwater harvesting and reuse to improve the water efficiency of new developments. This can be delivered for individual dwellings or on a community scale for larger developments.	Noted	None
		It is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024. However, we welcome this policy to ensure SuDS are incorporated in new developments, until the Schedule is formally implemented and the necessary measures are in place.	Noted	None
		As a minor point, Policy BRET 10 should take account of the different types of development and not only scale when referring to proposals being required to submit such schemes. An amendment to the policy should be made to reflect this.	The policy will be amended as suggested	Amend first sentence of policy to refer to type as well as scale of proposal
	Suffolk County Council	FLOODINGSCC, as the Lead Local Flood Authority, has the responsibility for managing flood risk arising from surface water, ground water and ordinary watercourses. The Environment Agency has the responsibility for managing flood risk from main rivers and the coast.SCC propose to add the following sentence to Policy BRET 10:	The Plan cannot stop people "proposing" development and the policy, together with the NPPF sequential test would be used in considering proposals.	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		"Development should not be proposed in areas at risk of any form of flooding."		
Policy BRET 1	1 – Dark Skies and Sti			
Pearce	-	8.25 highlights that the current rural atmosphere of the village is a result of no street lighting. I would advocate that BRET 11 should stress this and that any new developments would need to meet a high threshold to justify the installation of street lighting.	See comments from Suffolk CC below	None
M Kelly	-	I whole heartedly agree with this policy, it is a subject close to my heart. However, I think that this is difficult to put into practice, I am not aware of any legislation that would enable any control over an individuals choice of lighting. The two main culprits in the village for excessive lighting are the two schools, indeed this can actually be seen from space, as satellite photos of the village clearly show the effects of light pollution. I have made my feelings clear to one of the establishments, sadly, nothing has changed.	The policy does have limitations as it can only apply to planning applications. We can only encourage businesses and residents to install lighting schemes that minimise light pollution when planning permission is not required	None
P Knight	-	Is there the possibility to include a commitment to trying to reduce the already considerable light pollution associated with existing dwellings? Whilst I support the policy in relation to new development, the damage has already been done with regard to existing properties. Brettenham is not a "dark skies" village sadly.	The policy does have limitations as it can only apply to planning applications. We can only encourage businesses and residents to install lighting schemes that minimise light pollution when planning permission is not required	None
	Suffolk County Council	SCC approves of Policy BRET 11 – Dark Skies and Street Lighting from a landscape perspective.	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		For information, regarding Policy BRET11: any new flood lighting or other	Noted	None
		light sources that could impact upon the highway should be assessed by		
		the Highway Authority as part of the planning consultation process. SCC's		
		street lighting team do not usually allow lighting over 1 lux onto the		
		highway or any other lighting that may impact upon road users. SCC street		
		lighting team generally support the non-illumination of new developments		
		in rural areas where requested by local Parish Councils.		
Chanter 8 – Bu	ilt Environment			
C Clarke	-	It is essential to respect the local character of Brettenham housing such	Noted	None
		that any new planning proposals follow the the Design Guidance		
		document and the rural character.		
	Suffolk County	Section 8 and Policy BRET 8 clearly and effectively state the importance in	Noted	None
	Council	protecting listed buildings and buildings identified by the Neighbourhood		
		Planning group of local heritage significance. It is good to see that the		
		protection of archaeological heritage assets has been included in Policy		
		BRET 9 (section d (i)), however Section 8 would benefit from adding a		
		section regarding below-ground heritage assets.		
		SCC would encourage the addition of the following text:	The Plan will be amended to	Amend Section 8 to
		"Suffolk County Council Archaeological Service (SCCAS) advise that	refer to the need to consult the	refer to the need for
		there should be early consultations of the Historic Environment Record	Suffolk HER. However, it should	developers to consult
		(HER) and assessment of the archaeological potential of any potential	be noted that the West Suffolk	the Suffolk Historic
		development site at an appropriate stage in the design stage, in order that	Local Plan does not apply to	Environment Record
		the requirements of NPPF and West Suffolk Local Plan are met. SCCAS as	Babergh District	
		advisors to Babergh and Mid Suffolk Council are happy to advise on the		
		level of archaeological assessment and appropriate stages to be		
		undertaken."		
		This additional text would provide clarity to developers for any future	Noted	None
		development sites. In addition to this, the plan could also highlight any		

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		level of public outreach and public engagement that might be aspired		
		from archaeology undertaken as part of a development project, as		
		increased public understanding of heritage sites is an aspiration of the		
		NPPF.		
	Babergh District Council	Page 29 – Heritage Assets In order to highlight the importance of heritage assets in the parish, you may want to include a map showing the location of the listed buildings identified in paragraph 8.2 - we have included a map that you are welcome to use in the plan or add to Appendix B.	Given that the record of listed buildings can occasionally change, it is not considered necessary to include the map as it could become out of date but relied on by developers.	None
		Paragraph 8.2 In order to be compliant with the NPPF and the Brettenham Non- Designated Heritage Assets Assessment, the policy and supporting text should refer to 'Non-Designated Heritage Assets' rather than 'Buildings of Local Heritage Significance'. We have no comment to make on the buildings themselves, which seem appropriate.	The wording will be amended	Amend Policy BRET8 and supporting text to refer to Non- Designated Heritage Assets
Community As	tion 3 – Broadband			
L O'Hara		I have said yes, although have seen no evidence this is currently	Noted	None
LOTIDIO		happening	Noted	None
G Moulding	-	But we need to look at mobile phone coverage, 4G?	Noted	None
Anonymous	-	Broadband doesn't seem to be an issue anymore - met an acceptable	Noted	None
		speed		
Policy BRET 12	– Parking Standards			
T Tavener	-	I don't believe electric vehicle charging points should be included as	Noted	None
		standard, they can easily be added if and when required.		

Name	Organisation	Comment	Parish Council Response	Changes to Plan
	Anglian Water	Anglian Water recognises the need to manage parking arrangements	Policy BRET 12 will be amended	Amend BRET12 to
		within Brettenham. We recommend that off-street parking encourages	to require on-site parking and	require permeable
		permeable surfaces and green infrastructure to minimise surface water	residential drives to use	materials in
		run-off from the introduction of hard-standing areas, including a cross	permeable materials.	residential parking
		reference to those other policies covering surface water run-off e.g.,		and drives
		Policies BRET 9 and 10 and Appendix C Design Guidelines.		
	Babergh District Council	Policy BRET12 is similar in many ways to Policy WTD 14 in the adopted Wherstead Neighbourhood Plan. While the settlement pattern and design in Brettenham may not readily lend itself to proposals where 'courtyard	This is not considered necessary given the more rural nature of Brettenham compared with that	None
		parking' or 'on-street parking' is a practical / viable option, the Parish Council should consider including text similar to the last paragraph in Wherstead Policy WTD 14 to cover of such an eventuality.	of Wherstead.	
		Courtyards are also supported by the Brettenham Design Guidance and		
		Codes.		
Policy BRET 1	3 - Public Rights of Wa	y		
L O'Hara	-	I say no not because I don't support this policy but because current	Noted	None
		information on footpaths needs updating:		
T Tavener	-	I don't support any proposal to extend the Public Rights of Way in terms of extent or user. The plan earlier states that the village already has 'an	Noted	None
		extensive public footpath network which provides easy access to the		
		countryside'. Extending this further will result in increased negative		
		impact on wildlife through disturbance. Any proposal to extend the use of		
		public rights of way to cycling or horse riding will lead to degradation of		
		the surface (which is already a problem in the winter) directly impacting		
		the surface (which is already a problem in the winter) directly impacting the use and enjoyment of the rights of way for pedestrians, the intended		

changes to Plan
None
nended Amend BRET 13 to
include maintain
None
None
None
None
nended to Amend Policy BRET
n 13 to reflect SCC
comments

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		There could be reference to other strategies that support this	Paragraph 9.14 will be amended	Amend Para 9.14 to
		Neighbourhood Plan. This includes Suffolk County Council's Green		include reference to
		Access Strategy (2020-2030) ⁶ . This strategy sets out the council's		SCC's Green Access
		commitment to enhance public rights of way, including new linkages and		Strategy
		upgrading routes where there is a need. The strategy also seeks to		
		improve access for all and to support healthy and sustainable access		
		between communities and services through development funding and		
		partnership working.		
		-		
	tion 4 - Public Right			1
L O'Hara	-	FWIW	Noted	None
T Tavener	-	For the reasons stated above.	Noted	None
A Tavener	-	See above.	Noted	None
P Knight	-	See response to previous question.	Noted	None
C Clarke	-	See above re policy 13.	Noted	None
Anonymous	-	But very vague, would be good to have more detail on how this is going to	Noted	None
		happen		
Community Ac	tion 5 – Highway Im	provements		
T Tavener	-	Like everyone, I would like to see a reduction in speeding and more	Noted	None
		considerate driving to avoid the roadside verges from being wrecked		
		during winter. However, I am opposed to increased signage and street		
		furniture, which detracts from the rural character of the village.		
A Tavener	-	I support addressing speeding with cameras and enforcement but would	Noted	None
		not like to see additional signs. I would oppose any reduction in the speed		
		limit. What is a sign that indicates that motorists share the road with		
		pedestrians? Residents should be required to keep hedges trimmed so		
		that the pavements can be used safely.		
M Kelly	-	I would not wish to see a creeping " urbanisation " of the village by an over	Noted	None
		proliferation of road signs. I moved from a village that had over 30 road		

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		signs on a stretch of road just over 1 mile long, they had no discernible		
		impact on the behaviour of motorists.		
		If "gateways " mean the sort of white fencing on either side of the road		
		then, I am in favour as I think they help to define the entrance to the village		
		I don't think signs showing pedestrians in the road work , as a dog owner		
		who regularly walks down the roads, in my opinion, some motorists slow		
		down, and always will, others don't.		
G Moulding	-	As well as The Street, outlining roads are also badly affected by speeding	Noted	None
		motorists, so please do not neglect areas outside The Street.		
Anonymous	-	I agree about the protection of verges but I don't think speed is a particular	Noted	None
		issue within the village, and money would be better spent on the		
		maintenance of the roads rather than traffic calming or speed		
		signs/controls. When developers do build within the village they should be		
		responsible for repairing all highways and verges damaged by the build.		
	Suffolk County	SCC generally supports the aims of Community Action 5 and in order to	Noted	None
	Council	support them, SCC will seek to procure highway safety and sustainable		
		travel improvements from development wherever possible.		
•	rastructure and High			
T Tavener	-	I would be opposed to any suggestion of a 20mph speed limit in	Noted	None
		Brettenham. It should be possible to enforce the existing 30mph limit.		
	Suffolk County	With regards to paragraphs $9.8 - 9.12$ under the heading 'Car Parking' and	The references to the parking	Amend reference to
	Council	Policy BRET12, the correct title for Suffolk Guidance for Parking (2023)	guidance will be amended	title of Suffolk Parking
		should be used. SCC would support greater parking provision than Suffolk		Guidance
		Guidance for Parking (2023 or current version) where evidenced it is		
		appropriate and necessary in accordance with NPPF paragraph 111.		
		SCC essentially agrees with paragraph 9.12, that EV charging should be	Policy BRET 12 sets out the EV	None
		provided on new and significantly extended dwellings in accordance with	charging requirements	

Organisation	Comment	Parish Council Response	Changes to Plan
	Suffolk Guidance for Parking (2023 or current version) and Building Regs		
	Part S. Non-residential development should also provide EV charging		
	infrastructure in accordance with Suffolk Guidance for Parking (2023 or		
	current version). The parish council is entitled to set local standards,		
	again in accordance with NPPF paragraph 111 where there is evidence		
	that it is appropriate and necessary, but SCC notes that this requirement		
	seems to be set out in the text of the plan, rather than being drafted		
	formally as a policy. SCC recommends that consideration is given to		
	whether this is intended to be interpreted as a requirement in accordance		
	with NPPF paragraph 16(d); i.e. "plans should [] contain policies that are		
	should react to development proposals".		
Babergh District	Paragraph 9.2	The font size will be amended	Amend font size of
Council	Check font size		Para 9.2
	Paragraph 9.11		
	The second table in this section is misleading as the second column	The table in Para 9.11 will be	Amend
	needs to be renamed. Alternatively, you could combine the two tables in	amended	
	this section as per the below:		
	House Size SCC Guidance BBET12 Guidance		
nd Inset Man			
-	As detailed in answer 1 and 2. Extremely limiting.	Noted	None
-	Please note comments relating to the conservation area and important	Noted	None
	Babergh District	Suffolk Guidance for Parking (2023 or current version) and Building Regs Part S. Non-residential development should also provide EV charging infrastructure in accordance with Suffolk Guidance for Parking (2023 or current version). The parish council is entitled to set local standards, again in accordance with NPPF paragraph 111 where there is evidence that it is appropriate and necessary, but SCC notes that this requirement seems to be set out in the text of the plan, rather than being drafted formally as a policy. SCC recommends that consideration is given to whether this is intended to be interpreted as a requirement in accordance with NPPF paragraph 16(d); i.e. "plans should [] contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". Babergh District Council Paragraph 9.2 Check font size Paragraph 9.11 The second table in this section is misleading as the second column needs to be renamed. Alternatively, you could combine the two tables in this section as per the below: House Size SCC Guidance 1 bedroom 1 space per dwelling 2 spaces per dwelling 3 bedrooms 2 spaces per dwelling 3 bedrooms 3 spaces per dwelling 3 spaces per dwelling a bedrooms 3 spaces per dwelling 3 bedrooms 3 spaces per dwelling 3 spaces per dwelling	Suffolk Guidance for Parking (2023 or current version) and Building Regs Part S. Non-residential development should also provide EV charging infrastructure in accordance with Suffolk Guidance for Parking (2023 or current version). The parish council is entitled to set local standards, again in accordance with NPPF paragraph 111 where there is evidence that it is appropriate and necessary, but SCC notes that this requirement seems to be set out in the text of the plan, rather than being drafted formally as a policy. SCC recommends that consideration is given to whether this is intended to be interpreted as a requirement in accordance with NPPF paragraph 16(d); i.e. "plans should [] contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". Babergh District Council Paragraph 9.2 Check font size Paragraph 9.11 The second table in this section is misleading as the second column needs to be renamed. Alternatively, you could combine the two tables in this section as per the below: The table in Para 9.11 will be amended House Size SCC Guidance 1 bedroom 1 space per dwelling 2 bedrooms 2 spaces per dwelling 3 bedrooms 2 spaces per dwelling 3 bedrooms 2 spaces per dwelling 3 bedrooms 3 spaces per dwelling 3 bedrooms 3 spaces per dwelling 3 bedrooms 3 spaces per dwelling 3 baccs per dwelling The table in Ast detailed in answer 1 and 2. Extremely limiting.

Name	Organisation	Comment	Parish Council Response	Changes to Plan
L O'Hara	-	Do I support the content of a map? Either profound, or inane.	Noted	None
		I'll go for inane.		
G Moulding	-	But still not clear on settlement boundaries proposed!	Noted	None
G Roberts		I question why the village centre inset map does not include the church, centre academy, cock farm, the old schoolhouse and sparrows nest cottage. Then starts again at the council houses and other property along church road. Why the separation? If the properties mentioned are not in the centre why are the group at the end of church road.	We believe you mean the Settlement Boundary? Inclusion of the land in between these two areas would provide a presumption in favour of development, including new housing and open up significant areas of land for new housing development.	None
Appendices		1	1	1
L O'Hara	-	see answer to 26 and previous answers	Noted	None
T Tavener	-	The area in Appendix A shown as grassland to the north of Lower Road is in fact arable land.	Noted	None
	Suffolk County Council	Appendix C - Design Guidelines: The 'Green spaces, public realm and streetscape' section could be enhanced by including a reference to Suffolk Design: Streets Guide with regard to any new development street layouts. Vehicle Parking – this section should accord with Suffolk Guidance for Parking (2023 or current version). The sentences regarding a 'sense of enclosure' and 'boundary treatment' may conflict with the need for vehicular and pedestrian visibility splays. On Plot Garages should accord with the dimension requirements of Suffolk Guidance for Parking (2023 or current version).	Noted. The amendments are not considered necessary	None
	Babergh District Council	To future proof Appendix B, and in common with instructions given by Examiners on other neighbourhood plans, we recommend that you include the following sentence (or similar): ' <u>Up to date information on listed buildings and other heritage assets</u> should be sought from Historic England or another reliable source.'	Appendix B will be amended as suggested	Amend Appendix B to include reference to seeking up to date information from Historic England

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		This could appear as a standalone sentence or be added to the existing paragraph.		
Other comme	nts			
Pearce	-	There does not appear to be any considerations for business development within the plan, bar a comment in BRET 11 regarding lighting operations. I feel business development is a crucial area for the Neighbourhood Plan to address.	The development land for additional businesses is addressed in the Local Plan. Such development that would generate a lot of trips or deliveries would not be appropriate in a small village like Brettenham	None
L O'Hara	-	Lots more than I can put here, but little point save to say we had a workable draft, which I wasted many hours on. was asked to make tracked changes to it, he did not disagree. But then he went away and totally rewrote it, and never had the courtesy to explain why. This is not our Village Plan but an external imposition. Though I am sure future developers will gratefully drive a coach, lorry and dumper-truck through it.	The consultants were appointed by the Parish Council to provide a Plan that would meet the Government's Basic Conditions and survive independent examination reasonably intact. The draft provided required a significant rewrite in order to achieve this	None
A Tavener	-	There is too much emphasis on the use of traditional materials and methods. We need to move with the times. The whole thing is too 'big brother'.	The policy does not preclude the use of new materials	None
G Roberts	Resident	 I have spent the last five hours studying and commenting on this plan, for it only to be lost! It could be that it has been forwarded unfinished or it has been lost altogether. In which case the deadline is tomorrow and I do not have time to go over it again. If I thought my comments would make a difference then I would have somehow made the effort. Sadly on previous experience with Babergh 	The comments have been rescued and included in this schedule and the opportunity was given to submit the comments separately, which was taken up. Thos comments have also been included in this schedule	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		(referendum on merging with Mid Suffolk) it fell on deaf ears and Babergh ignored the results.		
M Kelly	-	A lot of work has obviously gone into the preparation of this and I would like to thank the people involved.	Noted	None
C Clarke	-	The development of this plan evolving since 2021 has captured the character of Brettenham which should be preserved as per its hamlet status	Noted	None
G Roberts		Having now ploughed through the neighbourhood plan. I consider that it was far too complicated for a layman to fully understand and while I endeavoured to give informed answers to your questions this was not easily achieved or even possible in certain chapters.	The Neighbourhood Plan will ultimately form part of the statutory development plan for the area and used by the District Council and Planning Inspectors to make decisions. That requires it to be legally compliant with government planning regulations	None
	Anglian Water	Thank you for inviting comments on the Brettenham Neighbourhood Plan Pre-submission (Reg 14) consultation. Anglian Water is the statutory water and sewerage undertaker for the neighbourhood plan area and is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers sustainable development for residents and visitors to the area, and in doing so protect the environment and water resources.	Noted	None
		It is noted that the neighbourhood plan does not allocate any new sites for housing or other commercial development. The following comments and observations are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water.	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		Anglian Water has produced specific guidance note on the preparation of NPs found using this link under our Strategic Growth and Infrastructure webpage - Strategic Growth and Infrastructure (anglianwater.co.uk). The guidance also has sign posting/ links to obtaining information on relevant assets and infrastructure in map form, where relevant.	Noted	None
		Overall, we are supportive of the policy ambitions within the neighbourhood plan, subject to the proposed amendments and we hope that the information provided is helpful to the future iteration of the Plan and wish you every success in taking this forward to the next stage. We look forward to being consulted on the submission version in due course.	Noted	None
	Environment	Thank you for consulting us on the pre-submission plan for the	Noted	None
	Agency	Brettenham Neighbourhood Plan. For the purposes of neighbourhood planning, we have assessed those authorities who have "up to date" local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.	Noted	None
		A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		obtain further information and advice to help support your neighbourhood plan. Environmental Constraints We have identified that the Neighbourhood Plan Area will be affected by the following environmental constraints:	Noted	None
		Flood Risk Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning	Reference is made in the Plan to this	None
		Source Protection Zones Your plan includes areas which are located on Source Protection Zones 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: https://www.gov.uk/government/collections/groundwater-protection We trust this advice is useful.	Noted	None
	Suffolk Fire and Rescue Service	Suffolk Fire & Rescue Service has considered the plan and are of the opinion that, given the level of growth proposed, we do not envisage additional service provision will need to be made in order to mitigate the impact. However, this will be reconsidered if service conditions change. As always, SFRS would encourage the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but if incorporated into the design/build stage it is extremely cost effective and efficient. SFRS will	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		not have any objection with regard access, as long as access is in		
		accordance with building regulation guidance. We will of course wish to		
		have included adequate water supplies for firefighting, specific		
		information as to the number and location can be obtained from our water		
		officer via the normal consultation process.		
	Historic England	Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of this Neighbourhood Plan.	Noted	None
		We welcome the production of this neighbourhood plan, in particular policies which seek to protect and promote the historic environment, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time. We would refer you to our advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve- your-neighbourhood/.	Noted	None
		For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Suffolk County Council.	Noted	None
		To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.	Noted	None
		Please do contact me, either via email or the number above, if you have any queries.	Noted	None
	Avison Young on behalf of National Gas	National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		instructed by our client to submit the following representation with regard to the current consultation on the above document.		
		About National Gas Transmission National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.	Noted	None
		Proposed sites crossed or in close proximity to National Gas Transmission assets An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.	Noted	None
		 National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area. National Gas Transmission provides information in relation to its assets at the website below. https://www.nationalgas.com/land-and-assets/network-route-maps 	Noted	None
		Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.		
		Distribution Networks Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com	Noted	None
		Further Advice Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.		

Name	Organisation	Comment	Parish Council Response	Changes to Plan
	Avison Young on behalf of National Grid Electricity Transmission	National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.	Noted	None
		About National Grid Electricity Transmission National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.	Noted	None
		National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.	Noted	None
		National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.	Noted	None
		Proposed development sites crossed or in close proximity to NGET assets: An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure.	Noted	None
		NGET has identified that it has no record of such assets within the Neighbourhood Plan area.	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		NGET provides information in relation to its assets at the website below.		
		www2.nationalgrid.com/uk/services/land-and-development/planning- authority/shape-files/	Noted	None
		Please also see attached information outlining guidance on development close to NGET infrastructure.		
		Distribution Networks Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk	Noted	None
		Further Advice Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.	Noted	None
	National Highways	Thank you for your correspondence, received on 22 January 2024, for inviting National Highways' comments on the above.	Noted	None
		National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding of the Neighbourhood Plan, we have responsibility for the trunk road A14.	Noted	None
		The area and location that are covered by this current consultation, Brettenham Neighbourhood Plan 2024-2037 Pre-Submission Draft Plan, is remote from the SRN. Consequently, for the proposed draft Neighbourhood Plan, it is unlikely to have an impact on the operation of the trunk road.	Noted	None
		Therefore, National Highways offers No Comment.	Noted	None
	Natural England	Thank you for your consultation on the above dated 22 January 2024		

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	Noted	None
		Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.	Noted	None
		Natural England does not have any specific comments on this draft neighbourhood plan.	Noted	None
		However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.	Noted	None
		Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species.	Noted	None
		Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.	Noted	None
		Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.	Noted	None
	Suffolk Wildlife Trust	I wanted to reach out on behalf of Suffolk Wildlife Trust, in my role as Planning and Advocacy Officer, and ask whether there would be an opportunity to discuss ways in which small changes could be made, perhaps to Policy BRET 6 which would help to deliver even greater biodiversity benefits.	Noted	None
		Engaging with local communities is a key part of our work as a Trust, and in the Planning and Advocacy Team this typically sees us engage at a parish level. While we have frequently spent time engaging with Neighbourhood Plans, it is only this year that we have made the decision to reach out and to try an engage in more detail, and at the same time perhaps informally, with Parish Councils. It would be fantastic to have a chance to put forward some ideas which I think could highlight existing habitats of value, such as the County Wildlife Sites in the parish, as well as help to restore and enhance habitats for nature.	The Plan has now reached an advanced stage in its preparation and it would have been better to have had such engagement at the outset of preparing the Plan	None
		Of course we will respond formally with a letter showing our support for the plan, as well as how we believe small changes could be made to	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		deliver even greater benefits for wildlife, helping to bring more nature back		
		to Brettenham,		
	Suffolk County	Thank you for consulting Suffolk County Council (SCC) on the Regulation	Noted	None
	Council	14 version of the Brettenham Neighbourhood Plan.		
		SCC is not a plan making authority, except for minerals and waste.		
		However, it is a fundamental part of the planning system being		
		responsible for matters including:		
		Archaeology		
		Education		
		Fire and Rescue		
		Flooding		
		Health and Wellbeing		
		Libraries		
		Minerals and Waste		
		Natural Environment		
		Public Rights of Way		
		Transport		
		This response, as with all those comments which SCC makes on emerging	Noted	None
		planning policies and allocations, will focus on matters relating to those		
		services.		
		Suffolk County Council is supportive of the Brettenham Neighbourhood	Noted	None
		Plan's vision for the Parish. In this letter we aim to highlight potential		
		issues and opportunities in the plan and are happy to discuss anything		
		that is raised.		
		Where amendments to the plan are suggested added text will be in italics		
		and deleted text will be in strikethrough.		
		EDUCATION		
		SCC, as the Education Authority, has the responsibility for ensuring there	Noted	None
		is sufficient provision of school places for children to be educated in the		

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		area local to them. This is achieved by accounting for existing demand and new developments. SCC, therefore, produces and annually updates a five-year forecast on school capacity. The forecast aims to reserve 5% capacity for additional demand thus the forecasting below may refer to 95% capacity. The information below is to inform the Neighbourhood Planning Group's understanding of educational provision in the Plan Area and does not need to be included in the Plan.		
		Primary Education Brettenham Parish is situated within the primary education catchment area of Rattlesden Church of England Primary Academy. The school is not currently forecast to exceed 95% capacity during the forecast period.	Noted	None
		Secondary Education Brettenham Parish is situated within the secondary education catchment area of Thurston Community College. The school is not currently forecast to exceed 95% capacity during the forecast period. However, the number of pupils arising from housing completions beyond the forecast period, applications pending decision, and local plan site allocations are expected to cause the school to exceed 95% capacity based on current forecasts. A project has recently completed to expand the 11-16 accommodation at Thurston Community College to provide additional places, with the potential of a further phased expansion in the future. This will be regularly monitored and reviewed.	Noted	None
		TRANSPORT SCC, as the Local Highway Authority, has a duty to ensure that roads are maintained and safe as well as providing and managing flood risk for highway drainage and roadside ditches.	Noted	None
		I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. Some of these issues may be addressed	Noted	None

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		by the SCC's Neighbourhood Planning Guidance, which contains		
		information relating to County Council service areas and links to other		
		potentially helpful resources.		
		The guidance can be accessed here: County Council Neighbourhood		
		Planning Guidance.		
		If there is anything I have raised you would like to discuss, please use my contact information at the top of this letter.		
	Babergh District	This response is made for and on behalf of Robert Hobbs (Corporate	Noted	None
	Council	Manager for Strategic Planning at Babergh & Mid Suffolk District	Noted	NUTE
	obunch	Councils).		
		Thank you for consulting us on Regulation 14 Pre-submission draft Brettenham Neighbourhood Plan. It is well presented, follows a familiar	Noted	None
		format, and contains a range of expected policies that seek to add value at the local level.		
		We do have some comments to make, which are set out on the appended table. For the most part, they are intended to help bring relevant parts of your draft Plan up to date prior to submission. Some natural updating will be necessary as your Plan progresses, particularly to parts of the introductory chapter.	Noted. The Plan will be updated	Bring Submission Plan up-to-date
		If a follow up conversation would be helpful on any of the points raised, then please do not hesitate to contact us.	Noted	None
		Other references to the Joint Local Plan should be reviewed to ensure they are consistent. 'JLP1' has been used occasionally and while this is acceptable, it should be used throughout the document or not at all.	The Plan will be amended to achieve consistency	Amend Plan to achieve consistent approach to Local Plan reference
		Glossary	The Discussible and the	Among d Dia 1
			The Plan will be amended to include a Glossary	Amend Plan to include Glossary
			include a Glossary	include Glossaly

Name	Organisation	Comment	Parish Council Response	Changes to Plan
		In order to aid the public in reading and understanding the plan, you may		
		want to include a glossary at the end of the document including terms		
		such as 'biodiversity' 'affordable housing' and 'sustainable development'		

Appendix 7 - Schedule of Post Pre-Submission Consultation Modifications

The table below sets out the changes made to the Neighbourhood Plan following the Regulation 14 Pre-Submission Consultation and the reasons for the modifications. Changes subsequent to the deletion of paragraphs or policies are not identified in this schedule. Deletions are struck through eg deletion Additions are underlined eg addition

	Paragraph		
Page	/ Policy	Modification	Reason
Cover		Amend as follows:	To bring the Plan
		PRE-SUBMISSION DRAFT PLAN	up-to-date
		JANUARY MAY 2024	
Contents		Amend as a result of changes elsewhere	Consequential
page			changes
5	1.5	Amend as follows:	To bring the Plan
		This is the " Pre -Submission" draft Neighbourhood Plan and provides the first <u>a further</u> 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:	up-to-date
6		Amend flow diagram as follows:	To bring the Plan
			up-to-date

	1		
		Current Pre-Submission Consultation Consultation Submission to Babergh District Consultation Submission to Babergh District Council	
		Babergh District Council adopt Plan	
6	1.6	Delete paragraph 1.6 as it repeats the content of 1.5 and renumber subsequent paragraphs	Grammatical
			change
		Before a neighbourhood plan can be brought into force it needs to complete the following stages:	
6	1.7	Amend as follows:	To bring the Plan
			up-to-date
		This <u>was carried out early in 2024. is the stage we've now reached. The plan has to be widely consulted on for a</u>	
		minimum of six weeks The Plan was consulted on for a period of seven weeks between 21 January and 8 March,	
		allowing residents, businesses, landowners and a range of government bodies and service providers to comment	
		on the Draft Plan. Full details of the consultation are contained in the separate Consultation Statement.	
6	1.8	Amend as follows:	To bring the Plan
			up-to-date
		All comments received at the "pre-submission" consultation will be were considered and reviewed and any	
		necessary amendments to the Plan will be were made, either to bring it up-to-date or in response to comments.	
		The Plan, together with supporting documents will then be have now been submitted to Babergh District Council. ,	
		who then undertake the following stages:	
		<u>"Submission" consultation – minimum 6 weeks</u>	
		Independent examination of draft Plan	
		Parish Referendum	

		• The Plan is then 'made' (adopted) by Babergh District Council and then becomes part of the development plan for making decisions in response to planning applications.	
6-7	1.11 to 1.17	Move paragraphs 1.11 to 1.17 to after 1.4	To improve clarity of Plan
7	1.16	Amend as follows: The planning policies will supplement, rather than repeat, adopted planning policies in the <u>Joint Local Plan for</u>	In response to comments
		Babergh and Mid Suffolk Districts. Babergh Local Plan. Part 1 of a the Joint Local Plan for Babergh and Mid Suffolk Councils was adopted in November 2023 and work on Part 2, dealing with the district settlement hierarchy, housing distribution and site allocations, is expected to commence in 2024 and take two years to complete.	
9	2.5	Amend second sentence as follows: In 2021 the parish usual resident population was 321, including those students boarding at Old Buckenham School.	In response to comments
11	3.4	Amend as follows: At a more local level, the Neighbourhood Plan has been prepared in the context of the current Babergh Local <u>Development</u> Plan, which comprises the Babergh and Mid Suffolk Joint Local Plan – Part 1, adopted in November 2023.	In response to comments
11	3.6	Amend as follows: A Joint Local Plan – Part 2 is planned to be <u>being</u> prepared that will <u>is likely to</u> identify a settlement hierarchy for the two districts, the distribution of any further housing growth and identify any sites required to meet that growth. <u>It is unlikely that this local plan document will be complete before the Neighbourhood Plan is adopted.</u> At the time of preparing the Neighbourhood Plan, work had yet to commence on this local plan document.	In response to comments

13	Objective 8	Correct spelling	Correct error
		Improve road safety, protect and enhance Bretteham's Brettenham's public rights of way and reduce the impact of traffic passing through the Parish.	
15	5.1	Amend as follows:	In response to comments
		Brettenham's lack of services and facilities contribute to making the village an unsustainable location for any significant level of future population growth. This is reflected by the local plan strategy for only limited development within the village. Outside the existing built-up area, the further expansion of the village could have significant impacts on the surrounding countryside much of which is also designated as a conservation area in recognition of	
		its distinct landscape, heritage assets and their settings and this is not supported.	
15	5.4	Amend first sentence as follows:	To ensure consistency
		One instance where the Joint Local Plan <u>JLP1</u> does support development outside the defined Settlement Boundaries is where there are clusters of ten "well related dwellings."	
15	5.5	Amend as follows:	In response to comments
		Given that JLP1 contains out of date Settlement Boundaries, the Neighbourhood Plan defines new Settlement Boundaries that reflect the spatial distribution of dwellings and built form of the village. This includes defining a Settlement Boundary at School Corner where the redevelopment of the former breaker's yard for four dwellings will result in a defined cluster of 14 dwellings that would fall into the definition where JLP1 Policy LP01, referred to above, would apply. Defining a Settlement Boundary for this area of the village helps to provide a positive interpretation of the Local Plan policy for clusters. The Neighbourhood Plan Settlement Boundaries are illustrated on Map 3.	
18	6.7	Amend as follows:	To ensure consistency

19	6.7	 Given that there was no overwhelming support for additional housing development in the village, the Neighbourhood Plan does not identify sites for housing. In line with the Joint Local Plan JLP1 policies, it is recognised that additional sites could come forward which, if they are located within the Settlement Boundary, will be supported in principle subject to impact on the character and appearance of the settlement, the landscape, residential amenity and heritage features. Amend second sentence as follows: In line with the Joint Local Plan policies, it is recognised that additional sites could come forward which, if they are located within the Joint Local Plan policies, will be supported in principle subject to impact on the character and additional sites could come forward which, if they are located within the Joint Local Plan policies, will be supported in principle subject to impact on the character and 	In response to comments
		appearance of the settlement, the landscape, residential amenity and heritage features.	
19	6.9	Amend first sentence as follows: National planning policy enables an alternative mechanism for meeting locally identified housing needs through "rural exception sites" located outside but adjoining the well related to a Settlement Boundary where housing would not normally be permitted.	To reflect changes in the NPPF
19	6.10	 Amend as follows: To deliver affordable housing through the "exception sites" approach, the following steps would be required: 1. A local need has to be established, usually through a detailed parish housing needs survey; 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) or a Community-led Development Organisation such as a Community Land Trust, willing to work with the Parish Council and District Council to fund and manage a scheme. 	In response to comments
19	6.11	Amend paragraph as follows:	In response to comments

		A <u>local</u> housing needs survey has not been carried out in Brettenham, but having a planning policy in place does facilitate the exploration of a <u>an exception site</u> scheme at any point in the future. During the Neighbourhood Plan period, should a housing needs survey identify a need for affordable housing to meet a local need, additional provision could be met through a "rural exception site" located outside but adjoining <u>a Settlement Boundary</u> the settlement boundary , where housing would not normally be permitted.	
19	6.12	Amends as follows: Joint Local Plan Policy LP07 - Community-led and rural exception housing, provides limited guidance on the delivery of affordable housing on a rural exception site, stating that it will be permitted where it is "well-connected to an existing settlement and proportionate in size to it". The Joint Local Plan also acknowledges that, in accordance with national policy, an element of market housing on a site might be necessary in order to make the delivery of the affordable housing viable. Given the limited Joint Local Plan policy guidance, the Neighbourhood Plan provides more detail as to how such an affordable housing scheme would be considered.	In response to comments
20	BRET 2	 Amend as follows: Proposals for the development of small-scale affordable housing schemes, including entry level homes for purchase (as defined by paragraph 72 of the NPPF) on rural exception sites outside but well connected to the existing settlement, the Settlement 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: Remains affordable in perpetuity; and Is for people that are in housing need because they are unable to buy or rent properties in the Village at openmarket prices; and Is offered, in the first instance, to people with a demonstrated local connection, as defined by the Babergh District Council Choice Based Lettings Scheme. Where there is no need, a property a property cannot be filled from within the parish it should then be offered to those with a demonstrated need for affordable housing in neighbouring villages and thereafter to the rest of Babergh District. 	In response to comments
		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 otherwise 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 need 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 it can be demonstrated: a. That no other means of funding the construction of the affordable homes is available; and b. The market housing is subsidiary to the affordable housing element of the proposal and the amount of market housing required is, as demonstrated through a viability assessment, the minimum required to deliver the affordable housing. Proposals including more than 35% open market housing will not be permitted. 	
		Where sites for affordable housing in the countryside are brought forward with an element of market housing, both housing tenures should be built to the same design standards and contribute towards the character of the area.	
21	6.18	Amend final sentence as follows:	In response to
		In this respect, the objectives of Policy BRET 9 - Design c onsiderations will apply to proposals for replacement dwellings within the <u>a</u> Settlement Boundary.	comments and correct grammatical error
22	BRET 3	Amend as follows:	In response to comments
		 In addition to Policy LP04 of the Joint Local Plan – Part 1, proposals for the replacement of existing dwellings and the conversion of buildings to residential use outside the a defined Settlement Boundary should demonstrate that: i. The replacement dwelling or conversion would not have a detrimental impact, or be more intrusive in the landscape, or countryside setting, or on heritage assets and their settings, than the original building; 	Comments

		 ii. The replacement dwelling is positioned on or close to the footprint of the existing dwelling, unless design, landscape, highway safety, residential amenity or other environmental grounds indicate that a more appropriate location on the plot can be justified; iii. The size of the replacement dwelling is not significantly larger than the original dwelling, irrespective of any outbuildings demolished on the site, and is appropriate to the countryside setting; and iv. The development includes an acceptable landscape scheme to retain and improve the rural nature of the locality. Applications for a replacement dwelling outside the a Settlement Boundary would be expected to provide a detailed analysis, through a landscape and visual impact assessment, of the visual impact of the new dwelling on the landscape or countryside setting. Increases in plot size to form additional garden, parking or amenity land will not be supported. 	
24	BRET 4	 Amend part ii. as follows: ii. how the proposal has regard to, conserves and enhances, the rural and landscape character and the setting of the built-up areas of the parish, having regard to Joint Babergh and Mid Suffolk Landscape Guidance 2015 or any successor documents. 	In response to comments
26	7.11	Amend paragraph as follows: There are no <u>nationally</u> defined nature conservation sites within the parish. However, all of the parish lies within the Impact Risk Zone of Thorpe Morieux Woods and Great Hastings Wood Site of Special Scientific Interest (SSSI), situated to the north-west of the parish boundary. The local planning authority will consult Natural England where the proposal is in an SSSI or within an Impact Zone and falls within a notifiable category as identified on Natural England's Magic Map https://magic.defra.gov.uk/. In addition, there are four County Wildlife Sites either wholly or partly within the Parish. These are Rattlesden Airfield, Ram's Wood, Morieux Wood, and Knightshill Grove.	I response to comments

26	7.16	Amend as follows:	To bring the Plan uo-to-date
		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 per cent 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 later in 2024. Paragraph 185 of the NPPF states that plans should "promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity." The 2021 Environment Act has introduced the requirement for development, except where exempt, to deliver a minimum 10 per cent measurable net gain in biodiversity.	
27	Fig 3	 Amend first bullet as follows: Evade Avoid or reduce biodiversity impacts through site selection and layout 	In response to comments
27	BRET 6	Amend policy as follows: Development proposals should avoid the loss of, or substantial harm to, <u>priority habitats</u> , distinctive trees, hedgerows and other natural features such as ponds and watercourses. Where such losses or harm are unavoidable <u>adequate mitigation measures or</u> , as a last resort, compensation measures will be sought. If suitable mitigation or compensation measures cannot be provided, then planning permission should be refused. ÷ 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.	In response to comments

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		Any such m 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 Brettenham's traditional trees and hedgerows); and 	
		 c) the installation of bird and bat boxes; and d) restoring and repairing fragmented wildlife biodiversity networks and corridors through, for example, the provision of bird and bat boxes and holes in fences which allow access for hedgehogs. 	
28		Amend Sub-heading title	In response to comments
		Protected Open Local Green Spaces	
29	8.2	Add the following to end of paragraph:	In response to comments
		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.	
30	8.8	Amend paragraph as follows:	In response to comments
		The outcome of that work is published in a report entitled "Local List of <u>Non-Designated Heritage Assets</u> Buildings and Structures of Architectural and Historic Interest" which is available to download on the Neighbourhood Plan pages of the Parish Council website. The identification of a <u>Non-Designated Heritage Asset</u> Building of Local	

		Heritage Significance in the Neighbourhood Plan does not carry the same weight as if it were Listed, their heritage significance will be taken into account when determining planning applications. Paragraph 203 of the NPPF states "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."	
30	BRET 8	Amend title and first sentence of policy as follows:	In response to comments
		Policy BRET 8 - Buildings of Local Heritage Significance Non-Designated Heritage Assets	
		The retention, protection and the setting of the following Buildings of Local Heritage Significance Non-Designated	
		Heritage Assets, as listed below and identified on the Policies Map, will be secured.	
32	BRET 9	Amend criterion g. as follows:	In response to comments
		g. cycle parking provision shall be in accordance with those expressed in the Suffolk Parking Guidelines County	
		Council Guidance for Parking (2023) and shall include secure and covered storage where appropriate to the	
34	BRET 10	development. Amend first sentence as follows:	la reconcinente
34	BKET TO	Amend first sentence as follows:	In response to comments
		Proposals for all new development will be required to submit schemes, appropriate to the scale and type 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.	
35	9.2	Amend font size of paragraph to be inline with remained of document	To correct formatting error
36	9.10	Amend paragraph as follows:	

		The Suffolk County Council <u>Guidance for Parking (2023)</u> 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 <u>2023</u> Guidance for residential development are reproduced below:	
37	9.11	Amend second column heading of table as follows: SCC Guidance Neighbourhood Plan Guidance	To correct error
37	BRET 12	Amend policy by adding the following to end: Hard standing parking spaces and driveways should be constructed from permeable materials to minimise surface water run-off.	In response to comments
37	9.14	Amend as follows: 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. Suffolk County Council's Green Access Strategy (2020-2030) sets out their commitment to enhance public rights of way, including new linkages and upgrading routes where there is a need. The Strategy also seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working.	In response to comments
37	BRET 13	Amend policy as follows: Measures to <u>maintain,</u> improve and extend the existing network of public rights of way and bridleways will be supported where <u>:</u> i. their value as biodiversity corridors is safeguarded; and	In response to comments

		 ii. where practicable, development proposals incorporate measures to enhance biodiversity; and iii. 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. 	
40	Policies Map	Amend map by adding Conservation Area Boundary	In response to comments
41	Village Centre Inset Map	Amend map by adding Conservation Area Boundary	In response to comments
44	Appendix B	Amend opening paragraph as follows: The buildings and features listed below are reproduced from the Historic England database of Listed Buildings and reflect the description held by Historic England. Buildings may be known differently locally but it is important that the nationally recognised reference is used in this Plan to avoid confusion. <u>Up to date information on listed</u> <u>buildings and other heritage assets should be sought from Historic England or another reliable source</u> .	In response to comments

