



# BRETtenham

## NEIGHBOURHOOD PLAN

2024-2037

SUBMISSION DRAFT PLAN



Brettenham Parish Council

JUNE 2024

Prepared by Brettenham Parish Council  
Supported by Places4People Planning Consultancy



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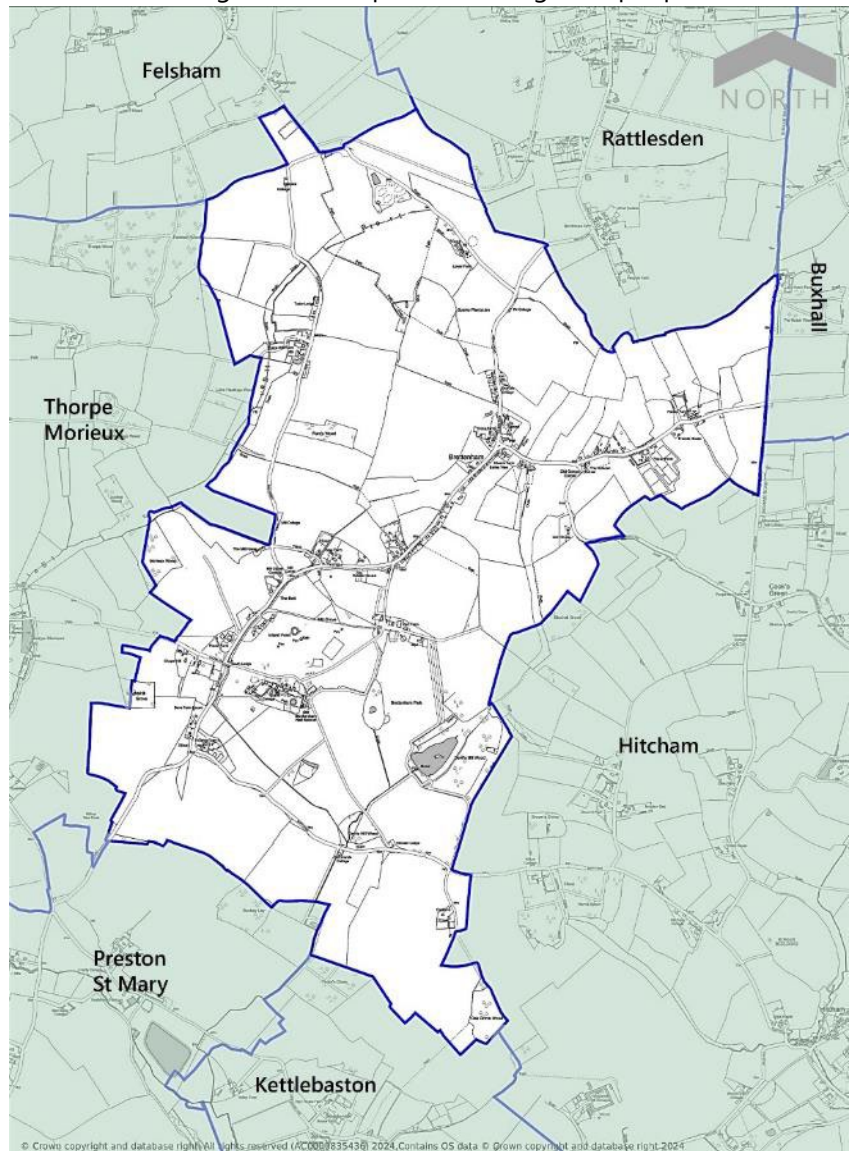


# 1. Introduction

- 1.1 The Localism Act 2011 introduced new rights and powers to allow local communities to prepare neighbourhood plans, which establish general planning policies for the development and use of land in the neighbourhood. These Plans, when properly “made” become part of the legal planning framework for the designated area.
- 1.2 A neighbourhood plan is, therefore, a community-led planning plan for guiding the future development, regeneration and conservation of an area. It concentrates on the use and development of land and can contain planning policies, proposals for improving the area or providing new facilities, and the allocation of sites for specific kinds of development.

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

- 1.4 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.



Map 1 – Designated Neighbourhood Area

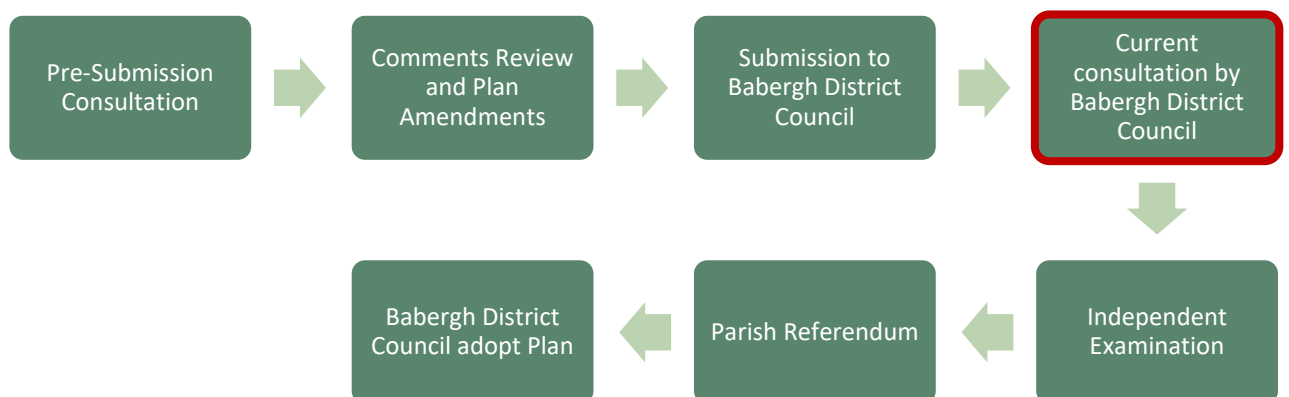
## Why a Neighbourhood Plan for Brettenham

- 1.5 Right at the start of the process the Parish Council set out the reasons why they felt it was important to develop a Neighbourhood Plan. The key focus was so that as a community the integrity of village life could be protected, by having influence and control over potential development in the village for the next 20 years, whilst maintaining and enhancing areas of heritage and conservation.
- 1.6 Even at that early stage four themes had been identified for the Neighbourhood Plan to cover: Housing, Natural Environment, Built Environment and Design, Infrastructure and services. These have since evolved in response to community engagement and the Plan’s topics are:



### How the Plan has been prepared

- 1.7 The Neighbourhood Plan has been prepared in accordance with the requirements of the Government’s Neighbourhood Planning Regulations and, in particular, has involved local community engagement and the preparation of specialist reports to support the content of the Plan.
- 1.8 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 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
- 1.9 These topics are covered in the following chapters of the Plan. Each topic chapter contains a reminder of the relevant objectives, links to the relevant planning policy context and a summary of the relevant evidence collected during the preparation of the Plan, culminating in neighbourhood planning policies. The Neighbourhood Plan covers the period 2024 to 2037, the current end date of the Babergh and Mid Suffolk Local Plan.
- 1.10 The planning policies will supplement, rather than repeat, adopted planning policies in the Joint Local Plan for Babergh and Mid Suffolk Districts. Part 1 of the Joint Local Plan was adopted in November 2023 and work on Part 2, dealing with the district settlement hierarchy, housing distribution and site allocations, commenced in 2024 and will take two years to complete.
- 1.11 The Neighbourhood Plan therefore includes a series of local policies and these are distinctly identified in coloured boxes with a prefix of BRET. In addition to planning policies, the Neighbourhood Plan contains “community actions” that, although they do not form part of the development plan, identify local initiatives that address issues and concerns raised during community engagement. The community actions are identified differently from the planning policies to avoid confusion.
- 1.12 This is the “Submission” draft Neighbourhood Plan and provides a further opportunity to comment. Once the consultation is complete, the Plan will pass through the remaining stages, as illustrated on the diagram below:



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

1.13 This was carried out in early 2024. 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.

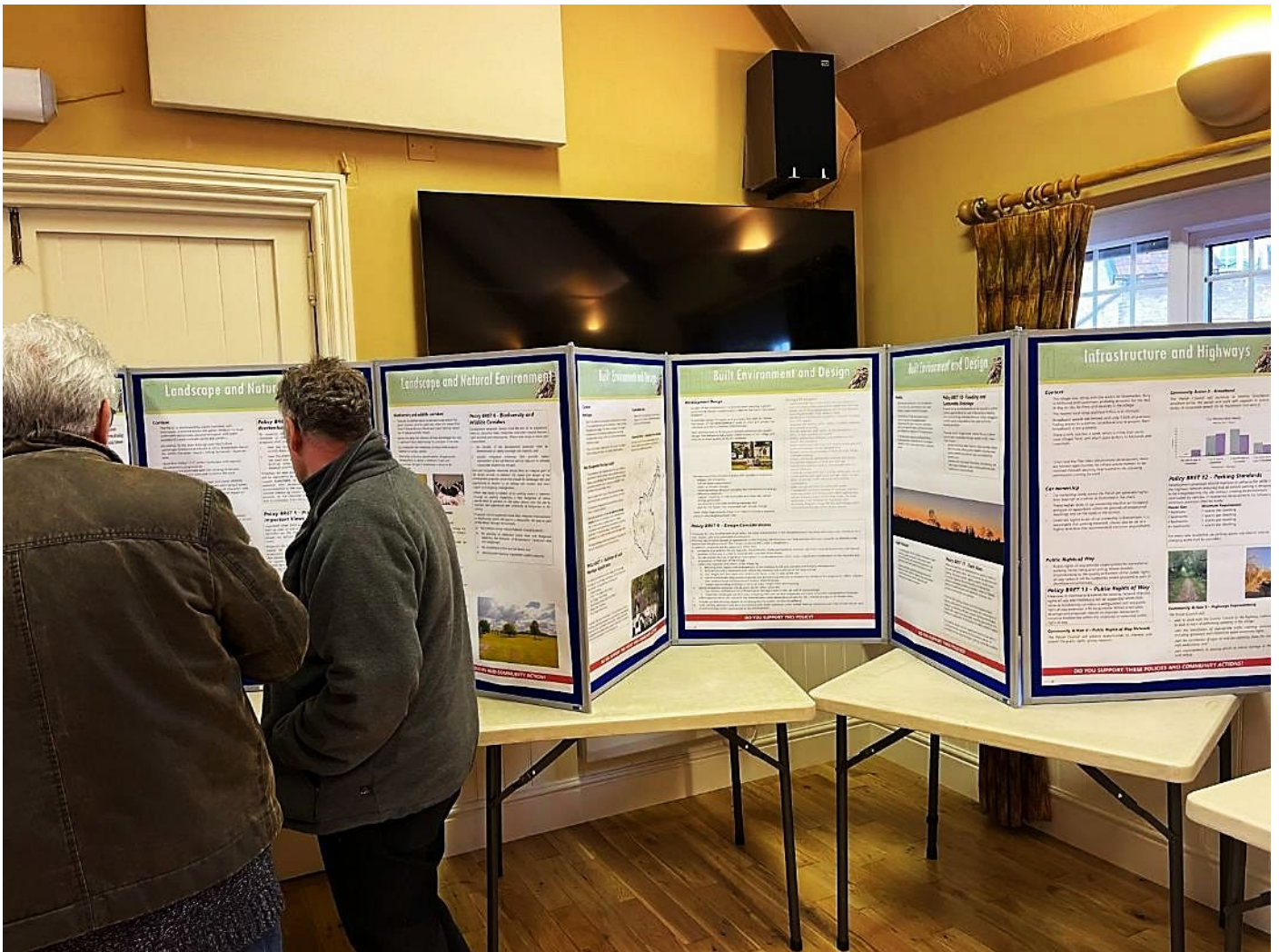
### Submission of draft Plan to Babergh District Council

1.14 All comments received at the “pre-submission” consultation were considered and reviewed and necessary amendments to the Plan were made, either to bring it up-to-date or in response to comments. The Plan, together with supporting documents have now been submitted to Babergh District Council.

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

1.16 The Neighbourhood Plan Regulations require a neighbourhood plan to:

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









## 2. Brettenham Past and Present

- 2.1 Brettenham is a village in west central Suffolk four miles north east of Lavenham and five miles south west of Stowmarket. The village is set on the watershed between the Stour and Gipping valleys, which were historically the main routes of communication being canalized up to Sudbury by 1709 and the Gipping up to Stowmarket by 1793. It lies just above the upper reaches of the River Brett which flows south to Chelsworth and continues through to Hadleigh before eventually joining the River Stour at Higham.
- 2.2 The first documentary evidence of Brettenham is contained in the Domesday Book (1086) with a recorded population of 35. By the 12<sup>th</sup> Century, Richard's descendants, controlled the bulk of the village with the exception of the Abbey Land. By then both estates were let to the Sampson family and not separated again at a village level until the 17<sup>th</sup> Century. William Sampson established Brettenham Park and was given Royal permission in 1247 to establish a hunting reserve. The Felton Family held the Brettenham Lands until the early 1600's when both estates were purchased by Thomas Cutler, a wealthy merchant and portman of Ipswich. By 1636 Edward Wenyewe had constructed a new mansion within the grounds of the enclosed parkland for his family and stayed in possession of the estate until 1847.
- 2.3 The estate was bought by Mr Joseph Parker in 1850 who made various changes. In 1856 a new wheelwrights shop was built which eventually became the petrol filling station which is now closed. In addition, a row of four cottages together with a new blacksmiths shop was constructed (Quality Row). The estate was sold again in 1860 to Thomas Beale who carried out further improvements by constructing a new Park Farm to replace the old farm buildings still situated in the Park and in 1902 the estate was purchased by the Warner Family.



Map 2: Ordnance Survey Map Brettenham 1903

- 2.4 The Village Hall was formerly the Reading Room and this was sold to the village in 1955 for £100. The estate was finally dissolved in 1956 when the Hall and Park were sold to Old Buckenham Hall School, the farms and cottages were also sold to their tenants. At this time (1959) the school also closed having just 12 pupils, being originally constructed in 1841 and enlarged in 1871 to accommodate 80 pupils.

### Brettenham Today

- 2.5 The parish covers some 735 hectares, and the village is dispersed along the main route through the parish, 'The Street'. In 2021 the parish usual resident population was 321, including those students boarding at Old Buckenham School. This was a reduction from 353 in 2011 but the main reduction was those aged 15 and under, likely due to the impact of the Covid pandemic and children returning home. Further analysis of Census data indicates that in 2021 there were 264 people living in households, an increase of ten over the



decade. During that period, is illustrated in the chart, the population aged 35 to 49 has nearly halved while those aged 65 and over has increased by 58%.

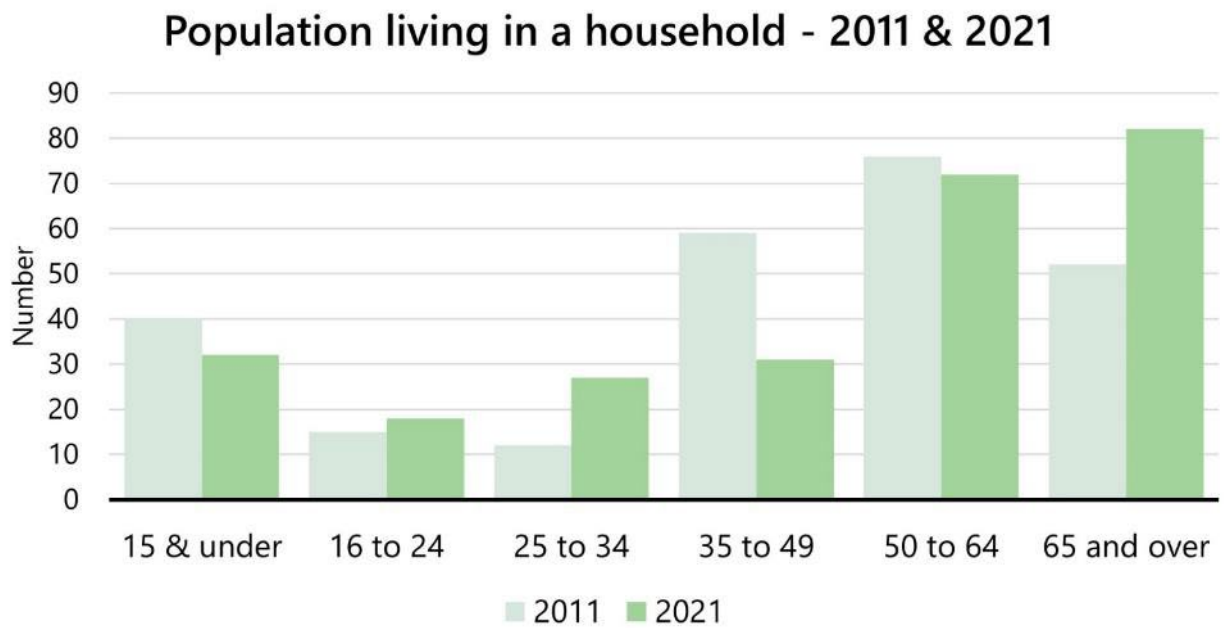


Figure 1: Household population comparison 2011 and 2021. Source - Census

- 2.6 The 2021 Census also records 97.5% of all housing, consists of houses or bungalows with just 1.7% as a flat or apartment. Housing tenure is predominantly owner occupied, with/without a mortgage, with only 0.8% social rented or 16.1% private rented. Nearly half of all households have 2 people, with just over a quarter being 1 person households and just under a quarter being 3 or more person households. In terms of number of bedrooms over 80% of all dwellings have 3 or more bedrooms.
- 2.7 When looking at economic activity, 55.8% of the population is in employment, compared 42.2 % being economically inactive. There are now two independent schools in Brettenham; Old Buckenham Hall School, an independent school for boys and girls aged between 7 and 13 years, and Centre Academy East Anglia in Church Road, offering education and support to students with a variety of learning needs.
- 2.8 There is also a conservation area covering approximately 150 hectares of the parish focusing on the parkland of Old Buckenham Hall School, but also extending along Bury Road and The Street, to encompass many of the listed buildings. The Church of St Mary the Virgin is listed Grade 1.
- 2.9 The natural environment is characterised by arable farmland, interspersed with public footpaths. Given the predominance of farming, there are few nature conservation designations within the parish. The farming landscape is dissected by the river valleys of the Brett and Box. Given this open form, wide panoramic views are offered in all directions.



## 3. Planning Policy Context

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

### National Planning Policy Framework

3.2 The National Planning Policy Framework (NPPF) sets out the Government's high-level planning policies that must be taken into account in the preparation of development plan documents and when deciding planning applications. In December 2023 the Government published a revised NPPF. The Framework sets out a presumption in favour of sustainable development. Paragraph 11 of the NPPF states:

*Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

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

3.3 The NPPF requires that communities preparing Neighbourhood Plans should:

- Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; and
- Plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.

### The Local Plan

3.4 At a more local level, the Neighbourhood Plan has been prepared in the context of the current Babergh Development Plan, which comprises the Babergh and Mid Suffolk Joint Local Plan – Part 1, adopted in November 2023.

3.5 There are ten strategic policies in the Joint Local Plan – Part 1 (referred to as JLP1 in this document) to which the Neighbourhood Plan must conform. The same Local Plan document also contains 32 local policies that do not need to be repeated in the Neighbourhood Plan but which the Neighbourhood Plan can complement by adding locally based detail.

3.6 A Joint Local Plan – Part 2 is being prepared that is likely to identify a settlement hierarchy for the two districts, the distribution of any further housing growth and identify any sites required to meet that growth. It is unlikely that this local plan document will be complete before the Neighbourhood Plan is adopted.

3.7 In July 2020, Suffolk County Council adopted the Minerals and Waste Local Plan which is part of the strategic policy framework for the area. However, there are no safeguarded sites within the neighbourhood area.





## 4. Vision and Objectives

- 4.1 The vision and objectives of the Neighbourhood Plan have been prepared taking into consideration the outcomes of the community engagement referred to earlier, as well as the evidence collected from published data, surveys and assessments. They also take account of the need to prepare a neighbourhood plan that conforms with the strategic policies of the Local Plan. The Vision sets out the over-arching approach as to how development in Brettenham will be delivered through the Neighbourhood Plan in the period to 2037. This is refined through the Objectives established for each of the topic areas which, in turn, have guided the identification of the planning policies contained in the Plan. The planning policies do not repeat the policies in the Local Plan or the NPPF but supplement them by adding local detail or addressing locally specific matters.

### VISION

**In 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.**

### Objectives

#### 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 Brettenham's public rights of way and reduce the impact of traffic passing through the Parish.







## 5. Planning Strategy

### Context

- 5.1 Brettenham's lack of services and facilities contribute to making the village an unsustainable location for any significant level of future population growth. 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.

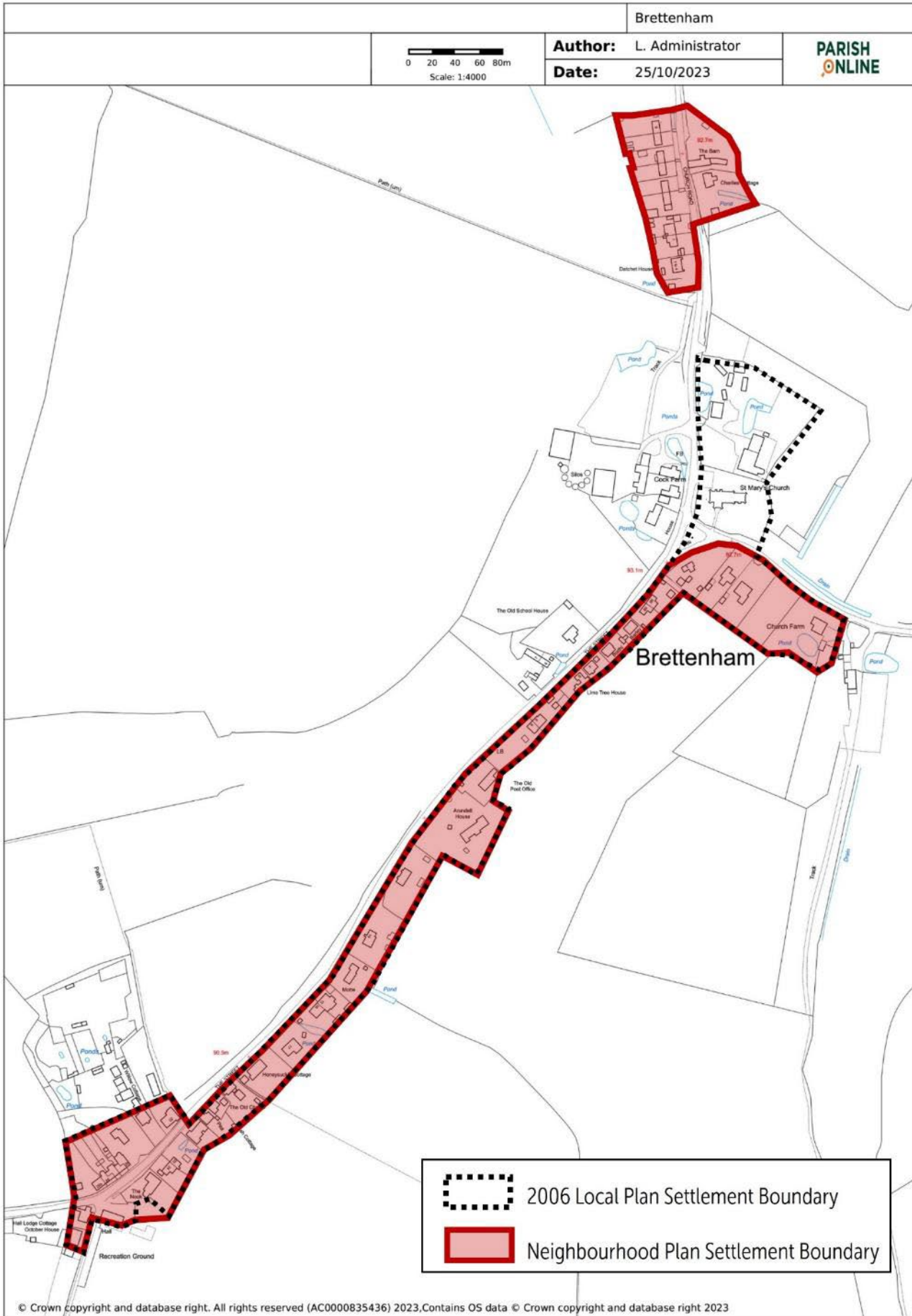
### Local Plan Context

- 5.2 JLP 1 does not provide a settlement hierarchy for the district or identify the amount of growth that will take place in Brettenham during the period to 2037. 'Policy SP03 - The sustainable location of new development' states that the Settlement Boundaries defined in the Babergh Local Plan 2006 are to be carried forward which, for Brettenham, does not represent the built-up area of the village today.
- 5.3 Policy SP03 supports the principle of development within the settlement boundaries subject to it being in accordance with other relevant planning policies. Only in specific circumstances will development outside the settlement boundaries be supported, such as where it is supported by specific development plan or national policies.
- 5.4 One instance where the Joint Local Plan does support development outside the defined Settlement Boundaries is where there are clusters of ten "well related dwellings." Policy LP01 states that infill development would be supported within such locations where the proposal is "not detrimental to the character and appearance of the settlement, landscape, heritage or residential amenity or would result in consolidating sporadic or ribbon development."

### Neighbourhood Plan Policy

- 5.5 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. The Neighbourhood Plan Settlement Boundaries are illustrated on Map 3.





Map 3 – Local Plan and Neighbourhood Plan Settlement Boundaries

5.6 In accordance with JLP1 Policy SP03, the spatial strategy for Brettenham supports the principle of development within the defined settlement boundaries subject to the consideration of the impact of the proposal as assessed against other policies in the Joint Local Plan and Neighbourhood Plan, such as

- the presence of heritage assets;
- the landscape setting of the village;
- the capacity of services and infrastructure;
- the potential impact on the amenity of existing residents; and
- the impact of development on the wider area.

This approach will ensure that the largely undeveloped countryside, much of which falls within the Conservation Area, will remain preserved.

5.7 There may be situations where it may be adequately demonstrated that it is necessary for development to take place outside the Settlement Boundaries. However, this will be limited to that which is specifically supported by the NPPF, Joint Local Plan and the Neighbourhood Plan. Table 5 of JLP1 identifies the policies permitting development outside settlement boundaries, subject to the development's accordance with the other relevant policies of the Plan.

### Policy BRET 1 – Spatial Strategy

***Settlement Boundaries are defined on Map 3 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.***





## 6. Housing

### Context

- 6.1 The 2021 Census shows that there were 127 dwellings in Brettenham parish, an increase of ten dwellings over the previous 20 years. At 1 October 2023 there was planning permission for three additional dwellings in the parish that had yet to be completed.
- 6.2 The 2021 Census identifies that, of the 127 dwellings, there was a slightly higher proportion of three and four bedroomed homes than across Babergh as a whole. This is not surprising given that there are likely to be a higher range of small dwellings in the towns such as Sudbury and Hadleigh.

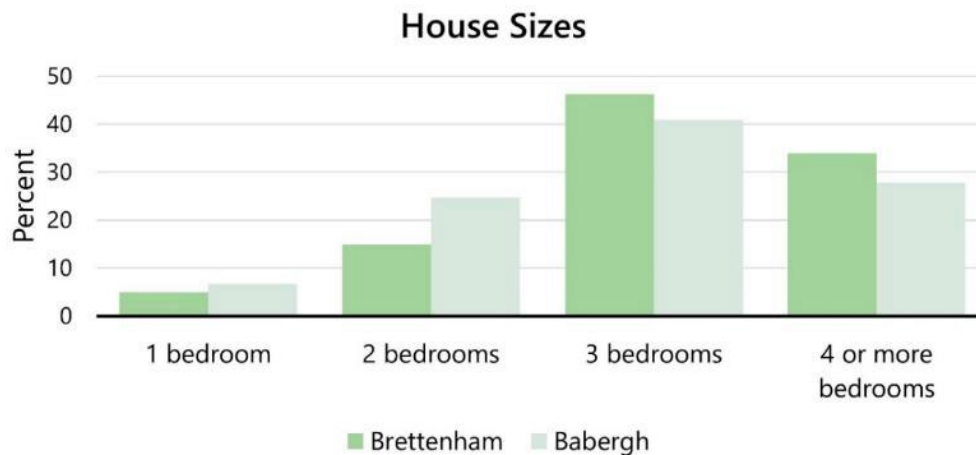


Figure 2: House Sizes. Source - 2021 Census

- 6.3 Some 27% of Brettenham's dwellings were occupied by one person in 2021 and 26% of homes with four or more bedrooms had only one or two occupants.

### Residents' Survey

- 6.4 The residents' survey sought to identify any interest in new housing in the village over the neighbourhood plan period. It specifically asked about children's future housing needs but over 80% of responses indicated this question was not applicable on the basis that they no longer had children living at home. Others responded along the lines that children would not want to remain in the village due to a lack of affordable housing and local employment opportunities.
- 6.5 In addition, residents were asked if they would like to see additional houses built in the village – the responses were almost equal with 39.7% saying yes and 41.3% saying no, then asked what type of additional accommodation would they like to see – responses included conversion of redundant barns, one off builds in keeping with the village and conservation area, other responses included reference to self-build plots and bungalows.

### Local Plan Context

- 6.6 As identified in Section 5, opportunities for further house building in Brettenham parish will be limited due to the tightly drawn Settlement Boundaries. Such opportunities would be infill and redevelopment within a Settlement Boundary (Policy LP01). Outside of the defined boundary:

- Policy LP04 allows for the replacement of dwellings outside of defined boundaries;
- Policy LP05 allows for dwellings for rural workers outside of settlement boundaries where it can be demonstrated that particular criteria can be met;
- Policy LP07 caters for the provision of affordable and community led housing to meet local needs as a rural exception site should a local need for the housing be identified.

In all instances, proposals must not be to the detriment of the character and appearance of the settlement, landscape, heritage or residential amenity.

## Neighbourhood Plan Policies

- 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 JLP 1 policies, it is recognised that additional sites could come forward which, if they are located within a 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.
- 6.8 However it is acknowledged that housing affordability remains a significant barrier for many seeking their own homes in the area. Government figures indicate that, in Babergh District, average house prices are more than 10 times the average household income, so many newly-formed households are excluded from the housing market.
- 6.9 National planning policy enables an alternative mechanism for meeting locally identified housing needs through "rural exception sites" located outside but well related to a Settlement Boundary where housing would not normally be permitted. This has the benefit of being on land where there is no "market" development value, thereby reducing the land value and enabling a viable affordable housing scheme. On occasions the cost of delivering affordable housing, even with discounted land costs, can exceed the grant money that is available to construct such schemes. In such instances, Government policy allows consideration of providing the bare minimum market housing on the site to make the development viable. It must be stressed that market housing would only be considered when there are viability issues for the deliverability of the affordable housing, and this would need to be proven through assessment by the District Council when considering the planning application.
- 6.10 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.
- 6.11 A local housing needs survey has not been carried out in Brettenham, but having a policy in place does facilitate the exploration of an exception site 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 a Settlement Boundary, where housing would not normally be permitted.
- 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.





## Policy BRET 2 – Affordable Housing on Rural Exception Sites

***Proposals for the development of small-scale affordable housing schemes on rural exception sites outside but well connected to the existing settlement, where housing would not normally be permitted by other policies, will be supported where there is a proven local need and provided that the housing:***

- i. Remains affordable in perpetuity; and***
- ii. 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 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.***

***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.***



- 6.13 One option for delivering affordable housing that meets local needs is through the creation of a Community Land Trust which are democratic, not-for-profit organisations that own and develop land for the benefit of the community. They typically provide affordable homes but can also deliver projects such as community gardens, pubs, shops, shared workspaces and local energy schemes. They are community organisations run by local people who want to make a difference to their local community, putting control of assets into the hands of local people.
- 6.14 Homes that are built through a Community Land Trust ensure that their homes are permanently and genuinely affordable, there may be opportunities for such a development in Brettenham, should sufficient support and volunteers be willing to come forward to run a Trust.
- 6.15 Like many communities, the proportion of Brettenham's population aged 65 and over is increasing as people live longer. Nearly twice as many residents of Brettenham are in this age bracket than there were in 2001 reflecting both the fact that people are living longer and remaining in their own homes as long as possible. The knock-on from this is that many homes will need to be adapted to make them accessible for those with increasingly limited mobility.
- 6.16 Whilst planning policies cannot influence the internal layout of dwellings as this is a matter for the Building Regulations, given the ageing population in the village, where new homes do come forward, meeting the accessible homes standards currently set out in Part M of the Building Regulations will be particularly welcomed. Part M defines three levels of housing accessibility:
- Category 1: Visitable dwellings – Part M4(1);
  - Category 2: Accessible and adaptable dwellings – Part M4(2) and
  - Category 3: Wheelchair user dwellings - Part M4(3).
- This is also supported by responses to the residents' survey where "wanting to move to a smaller or accessible home" were given as the prime reasons for changing housing needs over the plan period.
- 6.17 JLP1 Policy LP24 "Design and Residential Amenity" requires that at least 50% of dwellings meet the requirements for accessible and adaptable dwellings under Part M4(2) of Building Regulations. There is therefore no requirement for a planning policy in the Neighbourhood Plan to address this issue.

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

- 6.18 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. However, given the imbalance in the local housing sizes, it is considered essential that proposals for replacement dwellings should not result in a significant increase in the floorspace of the original dwelling. In this respect, the objectives of Policy BRET 9 - Design Considerations will apply to proposals for replacement dwellings within a Settlement Boundary.
- 6.19 The replacement of small dwellings outside the Settlement Boundary with significantly larger houses can radically change the character of a site to one of a more suburban nature, and also reduce the supply of smaller dwellings in the village. When clearly disproportional to the original, a replacement dwelling can be equivalent in its impact to that of a new dwelling and can therefore undermine both national and local policies on restriction of new development in the countryside. Even where a site is well screened there is a wider concern to maintain the essential rural nature and qualities of the area. JLP1 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 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;***
- 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 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.***



## 7. Landscape and Natural Environment

### Context

- 7.1 According to the Joint Babergh and Mid Suffolk Landscape Guidance produced in 2015, Brettenham Parish lies within the wider 'ancient rolling farmlands' character area, its features can be summarised as:
- A rolling landscape dissected by river valleys including The Brett and Box.
  - Ancient and species-rich hedgerows (mainly oak, ash and field maple, with suckering elm) and associated ditches have a strong visual impact as they are frequently high and wide.
  - Ancient woodland is scattered throughout in blocks consisting largely of oak, lime, cherry, hazel, hornbeam, ash, holly and elm. The woodlands provide strong visual features within the landscape.
  - Although there are some extensive field amalgamations resulting in a much more open landscape, overall the landscape is largely intact, and accessible through a dense network of winding roads and wide verges.
  - Wide panoramic views are offered in all directions.

There is in addition, a small area of "Rolling Valley Farmlands" to the south of the village, crossing the Bury Road to Old Buckenham Hall School.

- 7.2 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. Paragraph 179 of the NPPF states that plans should "promote the conservation, restoration and enhancement of priority habitats." These are defined in the Natural Environment and Rural Communities Act 2006 and across the parish there are a number of 'priority habitats' as illustrated in Appendix A.

- 7.3 There is also an extensive public footpath network which provides easy access to the countryside and the grounds of Old Buckenham Hall and the River Brett. Towards the south of the parish, the valley of a tributary to the River Brett lies within Flood Zone 2 and 3.

### Residents' Survey

- 7.4 There was strong support for the natural environment from the Residents' Survey in terms of residents having easy access to the countryside, lots of green spaces which contributed to the rural atmosphere of the parish. Residents also identified protecting the open countryside around the village and protecting the views and vistas into and out of the village.

### Planning Policy Context

- 7.5 JLP1 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.*

- 7.6 Planning applications must also be informed by any landscape character assessment or other local guidance in place at the time.

### Neighbourhood Plan Policies

- 7.7 Given the location of the village within an area of ancient rolling farmlands, it is important to retain that character and ensure that any development proposals do not harm its intrinsic features.



## Policy BRET 4 - Protecting Brettenham's Landscape Character

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

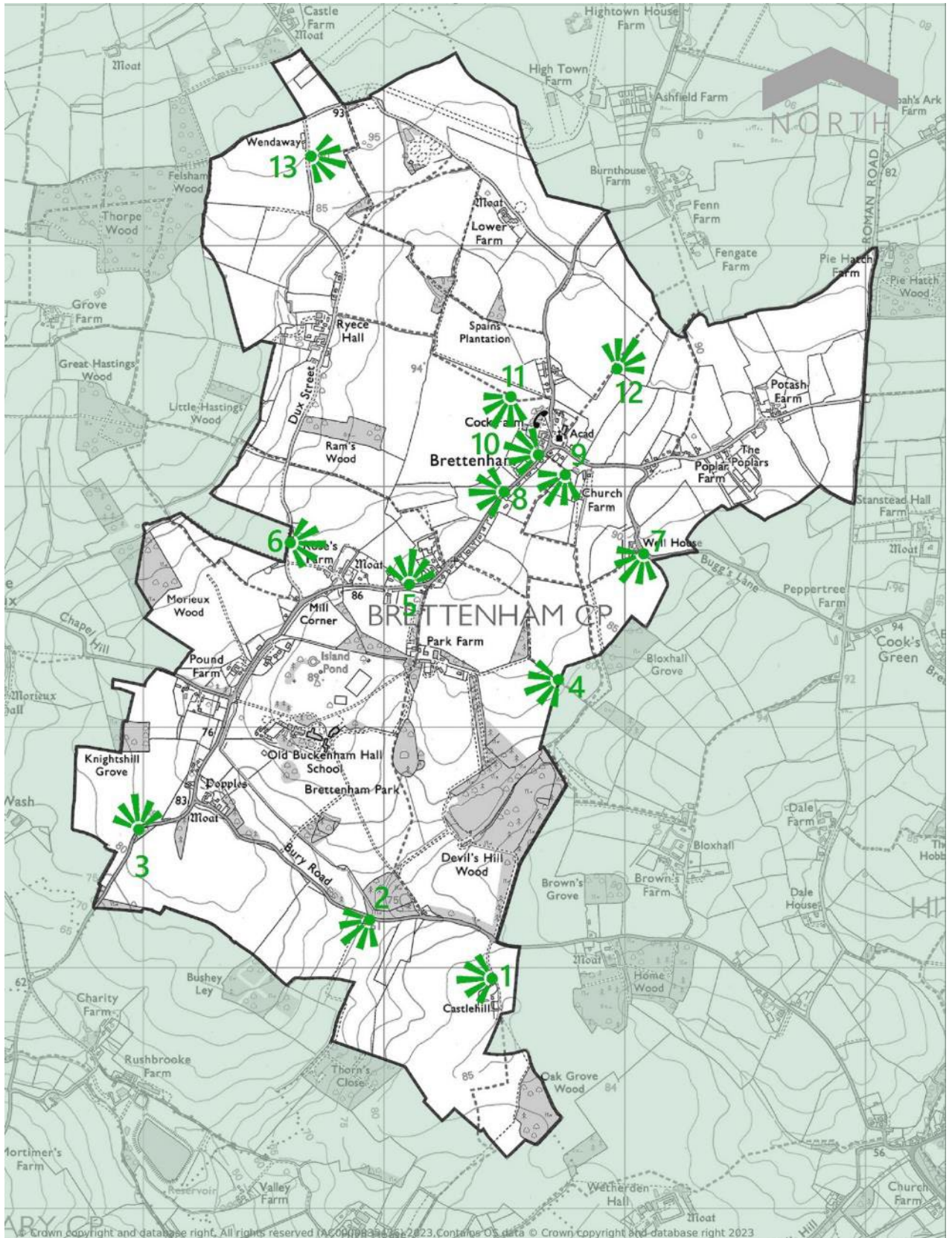
- i. how the landscape characteristics of the site and its vicinity have informed the design of the proposal; and*
- ii. how the proposal has regard to, conserves and enhances, the rural and landscape character and the setting of the built-up areas of the parish, having regard to Joint Babergh and Mid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

***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.***



### Important Views

- 7.8 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.
- 7.9 In particular there are fine views from the village west and north across open farmland, interspersed by established hedgerows and woodland towards Bury St. Edmunds (10 miles), where steam from the sugar beet factory chimneys can be seen during the season. Views southwest are towards Lavenham (5 miles), east towards Stowmarket (8 miles), south east towards Wattisham (5 miles), and south towards Bildeston (4 miles). Consequently, as part of the neighbourhood plan process, the most important views have been identified on Map 4 and are described in the separate Assessment of Important Views.



Map 4 – Important Views

7.10 In order to understand how a proposal might impact on the identified important views, planning applications outside the Settlement Boundaries should be accompanied by a Landscape Visual Impact Assessment, prepared in accordance with the Landscape Institute “Guidelines for Landscape and Visual Impact Assessment - Third Edition” (2013) or subsequent guidance, or appropriate and proportionate evidence relevant to the scale of the proposal, that demonstrates how the key features of the important views will be protected in all seasons.



## 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.***

### Biodiversity and wildlife corridors

- 7.11 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 (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/>.
- 7.12 The whole parish also falls within a Nitrate Vulnerable Zone, which are areas designated as being at risk from agricultural nitrate pollution. Development proposals will need to demonstrate appropriate mitigation measures against such impacts. JLP 1 Policy LP15 "Environmental Protection and Conservation" addresses matters around the efficient and effective use of land, pollution and water.
- 7.13 However, across the parish the influence of trees and hedgerows play a significant role in determining the character of the area. A large part of the parish is covered by the Brettenham Conservation Area designated in 1973. Within which there are various tree groups, including the avenue of trees leading up to Old Buckenham Hall School and various individual trees protected for their amenity value. One of the largest tree groups includes 73 oak trees, other species include lime, plane, field maple, ash, beech, sycamore and walnut.
- 7.14 The most recent hedgerow survey, carried out in 2006 and 2007, revealed 51% (71 in total) of the hedges contained eight or more species, 39.6% (55 in total) contained five to seven species and 9.4% (13 in total) contained between one and four species. The percentage of hedges found to contain five or more species is above the national average.
- 7.15 Given the extent of the hedgerows and woodlands distributed across the Parish, they provide a wide range of habitats for various species, including Roe and Muntjac Deer, Badgers, Hedgehogs, Bats, Barn and Tawny Owls and several species of Dragonfly. The area also provides hunting and nesting opportunities for a variety of birds of prey including kestrels, sparrowhawks, buzzards and recently, red kites. The combined effect of screening and providing natural habitats that these features create are vitally important within the parish and the wider area and their retention and enhancement will be supported.
- 7.16 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.
- 7.17 JLP1 Policy LP16 "Biodiversity and Geodiversity" requires all development to follow the "biodiversity mitigation hierarchy" which is illustrated in Figure 3.

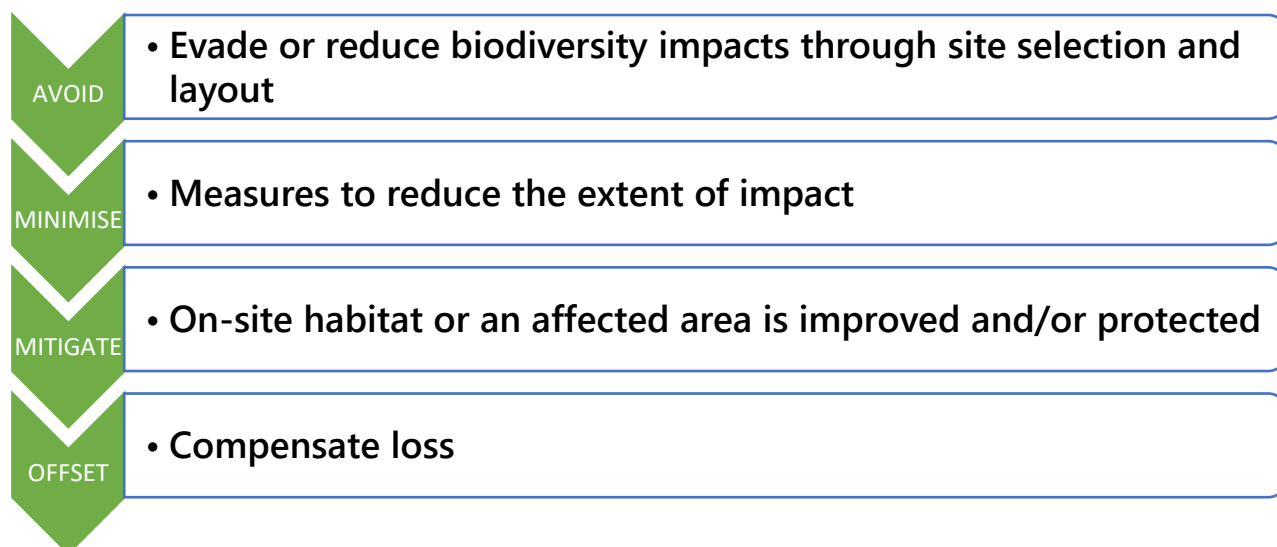


Figure 3 – Biodiversity Mitigation Hierarchy

7.18 There may be occasions where a new access to an otherwise acceptable development site would result in the loss of part of an existing hedgerow. Where this is necessary, a new hedgerow should be planted using native species of a local provenance on the visibility splay returns to minimise the loss of hedgerow and habitat and maintain the character of the area.

### 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:**

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

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

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

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

- a) the creation of new natural habitats including ponds;**
- b) the planting of additional native trees and hedgerows (reflecting the character of Brettenham's traditional trees and hedgerows);**
- c) the installation of bird and bat boxes; and**
- d) restoring and repairing fragmented wildlife networks.**

### 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.



## Protected Open Spaces

- 7.19 Public green spaces within the Neighbourhood Area, make an important contribution to the amenity, character and setting of the village and these include the open area around the junction of The Street, Buxhall Road and Church Road, the playground next to the Village Hall and the open space in front of the Church. The large green space in front of the Church, is maintained by the Brettenham Gardening Club with financial help from the Brettenham Village Association. Larger green spaces belong to Old Buckenham School and Centre Academy East Anglia which are excluded from public access.
- 7.20 The NPPF enables the designation and protection of land of particular importance to local communities as Local Green Spaces ('LGS') in neighbourhood plans. Such designations rule out new development other than in very special circumstances. Paragraph 106 of the NPPF states that the designation should only be used where the green space is:
- *in reasonably close proximity to the community it serves;*
  - *demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
  - *where the green area concerned is local in character and is not an extensive tract of land.*
- It is recognised that the designation of Local Green Spaces should not be used simply to block development.
- 7.21 A separate Local Green Space Appraisal has been undertaken as part of the preparation of the Neighbourhood Plan, which demonstrates how certain local spaces meet the criteria in paragraph 106 of the NPPF. The spaces that meet the criteria are identified in Policy BRET 7 and are illustrated on the Policies Map.
- 7.22 The identification of these spaces as Local Green Space means that development is restricted to that which can be demonstrated as being essential for the site, in line with the Green Belt policies defined by the NPPF. Permitted development rights, including the operational requirements of infrastructure providers, are not affected by this designation.

### Policy 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.***



## 8. Built Environment and Design

### Context

- 8.1 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.
- 8.2 There is one Grade I listed building (the church), two Grade II\* listed buildings and twenty-one Grade II listed buildings, designated for their architectural or historic interest, the details of which are provided in Appendix B. Babergh District Council prepared a Conservation Area Appraisal in 2013, includes a number of interesting facts about some of the listed buildings. It includes reference to the Grade II\* Popples Farmhouse which is set within its own moat south-west of Old Buckenham Hall, which itself is a large 16th century brick mansion altered in the 19th century. The complex of buildings, now used as a school, is set within 150 acres of extremely attractive parkland falling within the conservation area. 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.



### Residents' Survey

- 8.3 References to period character cottages and historic setting were recorded in the residents' survey. There was also strong support for expanding the conservation area, use of local materials and use of local traditional building styles.

### Planning Policy Context

- 8.4 The NPPF defines heritage assets as *"a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)."*
- 8.5 In terms of non designated heritage assets 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."*



8.6 JLP1 Policy LP19 “The Historic Environment” sets out a comprehensive policy response to all elements of the historic environment.

## Neighbourhood Plan Policies

### *Heritage Assets*

8.7 In addition to the statutory register of listed buildings, there are opportunities for local planning authorities and neighbourhood plans to identify buildings and features having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets. Some local planning authorities create a “Local Heritage List” so that their significance can be taken into account in planning applications affecting the building or site or its setting. Babergh District Council does not currently operate such a list and therefore a separate piece of work in preparing the Neighbourhood Plan has identified a number of buildings and features across the Parish that have a local heritage significance and that are worthy of further protection. The work has been informed by Historic England’s guidance note “Historic England 2021 Local Heritage Listing: Identifying and Conserving Local Heritage.”

8.8 The outcome of that work is published in a report entitled “Local List of Non-Designated Heritage Assets” which is available to download on the Neighbourhood Plan pages of the Parish Council website. The identification of a Non-Designated Heritage Asset 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.”

## Policy BRET 8 – Non-Designated Heritage Assets

***The retention, protection and the setting of the following Non-Designated Heritage Assets, as listed below and identified on the Policies Map, will be secured.***

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

***Proposals for any works that would cause harm to or negatively impact the significance of the structure or setting of buildings of local significance should be supported by an appropriate analysis to enable a balanced judgement to be made having regard to the scale of any harm or loss and the significance of the heritage asset.***

8.9 Furthermore, the Conservation Area Appraisal identified a number of issues such as the use of modern materials including concrete roof tiles or uPVC windows and bargeboards on many of the unlisted but otherwise traditionally built buildings in particular along The Street, which can detract from the overall appearance of the village.

8.10 The Parish Council has identified a number of ‘character areas’ covering different parts of the village, which are focussed on the Conservation Area:

1. Central Core (The Village Green, Church of St Mary the Virgin, St Mary’s House, Cock Farm, Centre Academy)
2. Central North (Church Road north of Centre Academy)
3. Central East (past Church Farm to Old School Corner)
4. Central South (from The Village Green along The Street to the Village Hall, Brewers, Rose Farm, Mill Corner, along Bury Road past Pound Farm to the entrance gates to and including Old Buckenham Hall)
5. Central South West (Chapel Hill House to Popples, including Dove Farmhouse, and extending to Brooklands Cottage)
6. Outlying (including Ryece Hall, Lower Farm, Fir Cottage, past Crownings, Poplar Farm, Francis House, The Grange, Potash Farm, and left at the crossroads opposite Peppertree Farm, past Well House to Old School Corner)

- 8.11 These areas all have their own special qualities and would benefit from further assessment and guidance. Given they fall within the Conservation Area, this information provides an opportunity to refresh the Conservation Area Appraisal.

## 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.

### Design

- 8.12 The design features of new homes can have a significant impact on the character of an area. JLP1 Policy LP24 "Design and Residential Amenity", sets out a number of parameters for new development to comply with including '*all new development must be of high-quality design, with a clear vision as to the positive contribution the development will make to its context*'.
- 8.13 AECOM were commissioned in 2021 by the Parish Council as part of the Government's neighbourhood planning support package, to prepare Design Guidance and Codes (October 2021) to inform the Neighbourhood Plan. The purpose was to establish principles so that new development is designed and planned with regard to the existing character and context of the area. The resulting guidelines are expressed as a series of general design considerations in addition to a set of design guidelines and codes.

### Residents' Survey

- 8.14 Residents were asked about important features and there was strong support for the use of local building materials and local traditional building styles.

### Planning Policy Context

- 8.15 The NPPF makes it clear, in paragraph 131, that 'good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.' In January 2021 the Government published the National Design Guide to illustrate how well designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. It 'provides a structure that can be used for the content of local design policies, guides and codes, and addresses issues that are important for design codes where these are applied to large scale development on single or multiple sites.' This was followed up in July 2021 by the more detailed National Model Design Code which sets out guidance for what could be included in a Design Code for sites and places.

### Neighbourhood Plan Policies

- 8.16 The Design Guidance and Codes identify that, in the first instance, proposals for development should include evidence that the following general design principles have been considered and applied.

#### 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;*
- *Provide 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 landscape and built form features into the development;*
- *Respect surrounding 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 (including facilities for kerbside collection, waste separation and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours; and*
- *Sensitively integrate energy efficient technologies within the scheme at the start of the design process.*



8.17 The Design Guidance and Codes provide locally contextual detail to which development proposals should, as appropriate, seek to respond to. These are reproduced in Appendix C of the Plan. Innovative and/or eco-friendly design that achieves the policy requirements would be welcomed. To reverse the decline of the native swift population, we would encourage the installation of swift bricks on every new house. Protecting wildlife is a major priority for villagers.

## **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;***
  - v. respect surrounding buildings in terms of scale, height, form and massing;***
- d. taking mitigation measures into account, do not affect adversely:***
  - i. 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;***
- e. where appropriate to the nature of the development, make adequate provision for the covered storage of all wheelie bins;***
- f. include suitable ducting capable of accepting fibre to enable ultrafast broadband;***
- g. 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.***



- 8.18 Minimising energy demands from development and increasing the generation of energy from renewable sources can make a significant contribution to reducing carbon emissions as well as household costs. The starting point for minimising energy use is to maximise energy efficiency, both in new developments and through the retrofitting of existing buildings. This can have a direct economic benefit in terms of significantly lowering the running costs of new and existing buildings, helping to address fuel poverty, as well as tackling the Climate Crisis. The Building Regulations set minimum energy efficiency requirements of for new development but exceeding the minimum requirements will be necessary if emission reduction targets are to be met.
- 8.19 Where energy use is necessary, then priority should be given to utilising the most sustainable sources. Many energy saving initiatives can be installed on homes within permitted development rights (when full planning permission is not required) and residents are encouraged to implement such measures. There may be occasions where schemes that do require planning permission could have a potential adverse impact on the character of the area and the amenity of nearby residents. The Neighbourhood Plan has limited powers to require developments to meet energy saving standards, especially in the construction of new homes. However, that does not stop the encouragement of the incorporation of measures in development that meet the energy hierarchy (in order of preference) of:
1. Minimising energy demand;
  2. Maximising energy efficiency;
  3. Utilising renewable energy;
  4. Utilising low carbon energy; and
  5. Utilising other energy sources.
- 8.20 JLP1 Policy LP23 "Sustainable Construction and Design" contains a number of criteria to reduce CO<sub>2</sub> emissions, reduce water consumption, climate change adaptation, minimise energy demand including the introduction of energy efficiency measures, installing on-site renewable and other low-carbon energy generation, incorporating sustainable building materials and planning for the future risks associated with climate change. Given these requirements, there is no need to include a separate policy in the Neighbourhood Plan.

### ***Flooding and Sustainable Drainage***

- 8.21 Whilst the extent of flood zones 2 and 3 are restricted to the river valley to the south of the parish, some surface water flooding has occurred, as evidenced by the catastrophic flash floods that occurred on 25 July 2021 resulting from a rare extreme weather event localised over Brettenham. Around 30 dwellings suffered internal flooding most either by field run-off or run-off from the roads. The length of The Street and Bury Road between Rose Farm and Dove Farm House are identified as having a 0.1% chance of surface water flooding in any year while some parts of the same area have a chance of flooding of greater than 3.3% each year.
- 8.22 National planning policy restricts the type of development that can take place in the areas likely to flood. It is essential that development proposals do not add to this risk through creating surfaces where rainwater can run-off into the highway or neighbouring sites and create new or exacerbate existing surface water flooding problems.





- 8.23 Given the history of severe surface water flooding in Brettenham, all new development should be accompanied by a flood risk assessment and a drainage strategy to support any mitigation measures required to mitigate against all forms of flood risk.
- 8.24 New development will also be required, where appropriate, to make provision for the attenuation and recycling of surface water and rainwater through Sustainable Drainage Systems (SuDS) that might include on-site rainwater and stormwater harvesting and greywater recycling, and the management of run-off and water management in order to reduce the potential for making the situation worse.

### Policy BRET 10 - Flooding and Sustainable Drainage

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

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

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

### Dark Skies

- 8.25 One of the matters raised in response to the resident's survey was the rural atmosphere around the village and a desire for this to be preserved. Part of this is due to the lack of street lighting. However, the installation of floodlighting and security lights on buildings whether domestic or commercial can have a significant detrimental impact on the rural character and hence rural atmosphere of the village.
- 8.26 Paragraph 185 (c) of the NPPF states that planning policies and decisions should "limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation".

### Policy BRET 11 – Dark Skies and Street Lighting

*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.*

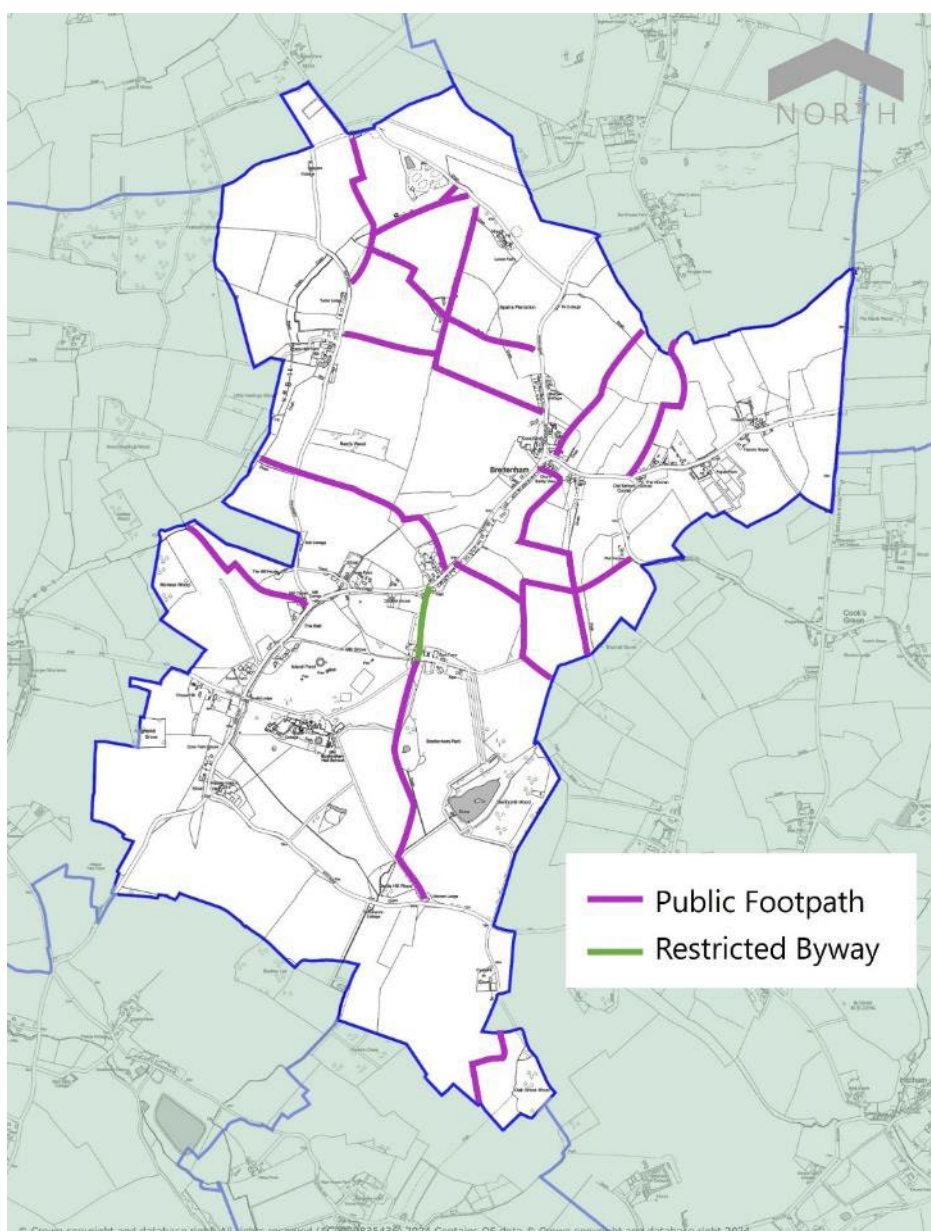
*The lighting should only be operational during times when it is essential for the operation of the business and out of operational hours security trigger lighting should be installed.*



## 9. Infrastructure and Highways

### Context

- 9.1 Together with the village size, access to Stowmarket, Bury St Edmunds and Lavenham, probably accounts for the lack of day-to-day facilities and services in the village. There is no public school in the village, but two independent schools. The Village Hall is situated towards the end of The Street, adjacent to the playing field with play equipment. It acts as the key social destination in the village with a fully fitted kitchen and bar and various local clubs and activities meet there. There is also St Mary's Church, which together with the Village Hall are the principal community facilities in the village.
- 9.2 There is a local shop with Post Office, but this lies outside the parish in Hitcham. The Parish Council's website also lists various clubs and organisations that run in the village and broadband speeds are also limited, with only 7.35% of premises having access to superfast broadband and at present fibre broadband is not available.
- 9.3 Public transport is extremely restricted with a weekly only service on a Wednesday running from Bury St. Edmunds through, Bildeston to Hadleigh, stopping outside the Church in Brettenham leaving the village for Bury St. Edmunds at 10:20 and returning at 13:41.
- 9.4 Although the village is located close to the A14 trunk road, access to it is poor due to narrow country roads with no footpaths or street lighting and there is damage to the rural verges in some places due to passing traffic.
- 9.5 There are however a number of public rights of way which link The Street with the surrounding countryside as shown on Map 4.



Map 4 – Public Rights of Way in Brettenham

### Residents' Survey

- 9.6 Various questions in the residents' survey relate to infrastructure and highways, two specific matters highlighted were the lack of fast reliable broadband and pedestrian safety/speed of traffic on the rural lanes. Further comments included reference to off-road parking, parking on pavements and/or verges.



## Neighbourhood Plan Response

### Infrastructure

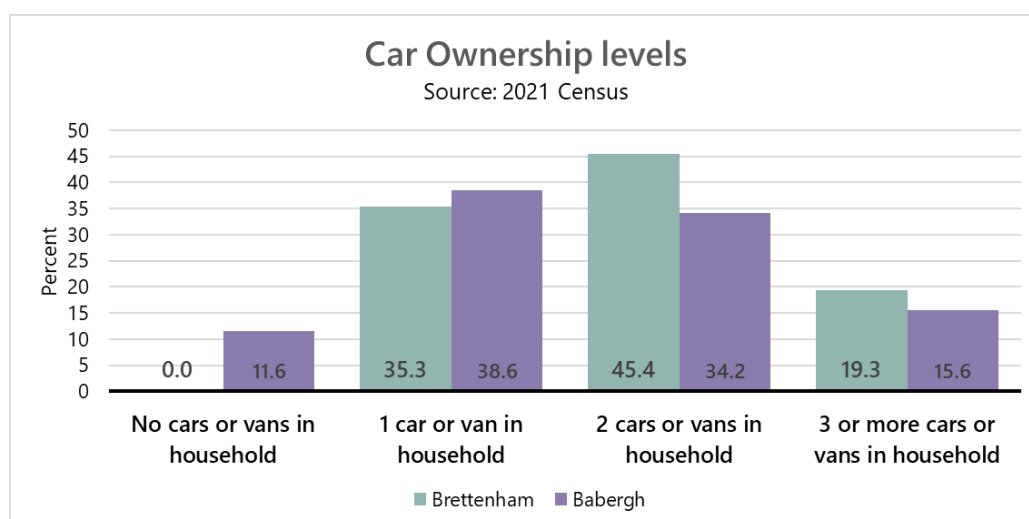
- 9.7 Given that the Plan does not promote development, there are limited opportunities for infrastructure matters to be resolved through securing improvements via planning permissions coming forward. As already highlighted, broadband speeds are currently relatively poor in the village which is disappointing given the remoteness of the village. Accordingly, the following community action is included.

#### 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.

### Car parking

- 9.8 Car ownership levels across the Parish are generally higher than Babergh as a whole as illustrated in the chart. The 2021 Census identifies that every household had access to a car or van and those with two or more cars or vans were at much higher levels than across Babergh as a whole. The high levels of car ownership are expected to continue, especially given lack of bus services and no day-to-day services in the village. 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.



- 9.9 Paragraph 111 of the NPPF states that, "If setting local parking standards for residential and non-residential development, policies should take into account:
- a) the accessibility of the development;
  - b) the type, mix and use of development;
  - c) the availability of and opportunities for public transport;
  - d) local car ownership levels; and
  - e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles."

9.10 The Suffolk County Council Guidance for Parking (2023) 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 2023 Guidance for residential development is reproduced below:

House size	SCC Guidance
1 bedroom	1 space per dwelling
2 bedrooms	2 spaces per dwelling
3 bedrooms	2 spaces per dwelling
4+ bedrooms	3 spaces per dwelling

9.11 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. For all residential developments, the minimum parking spaces required for each new dwelling shall be as set out below:

House size	Neighbourhood Plan Guidance
1 bedroom	2 spaces per dwelling
2 bedrooms	2 spaces per dwelling
3 bedrooms	3 spaces per dwelling
4+ bedrooms	3 spaces per dwelling

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

### 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:***

<b><i>House Size</i></b>	<b><i>Minimum Requirement</i></b>
<b><i>1 bedroom</i></b>	<b><i>2 spaces per dwelling</i></b>
<b><i>2 bedrooms</i></b>	<b><i>2 spaces per dwelling</i></b>
<b><i>3 bedrooms</i></b>	<b><i>3 spaces per dwelling</i></b>
<b><i>4+ bedrooms</i></b>	<b><i>3 spaces per dwelling</i></b>

***For every new residential car parking space, one electric vehicle charging point shall be provided.***

***Hard standing parking spaces and driveways should be constructed from permeable materials to minimise surface water run-off.***



### ***Public Rights of Way***

- 9.13 There are various Public Rights of Way in the Parish (see Map 4 above), many starting from The Street and providing access east and west of the village to the open countryside and the opportunity for circular routes. 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.
- 9.14 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 maintain, improve and extend the existing network of public rights of way will be supported where;***

- i. their value as biodiversity corridors is safeguarded; and***
- ii where practicable, development proposals incorporate measures to enhance biodiversity; and***
- iii any public right of way extension is fit for purpose.***

### **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 5 – Highway 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.

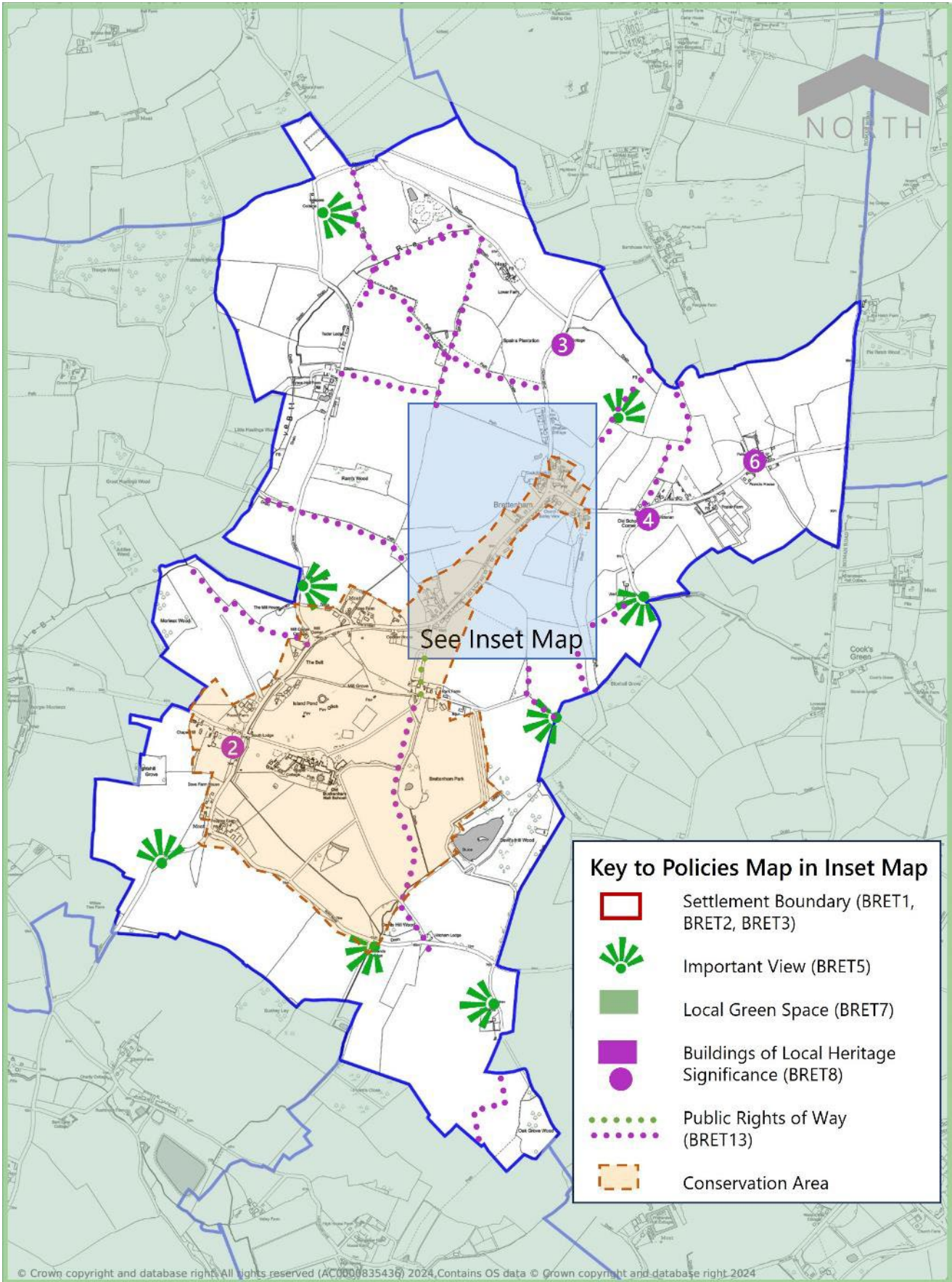




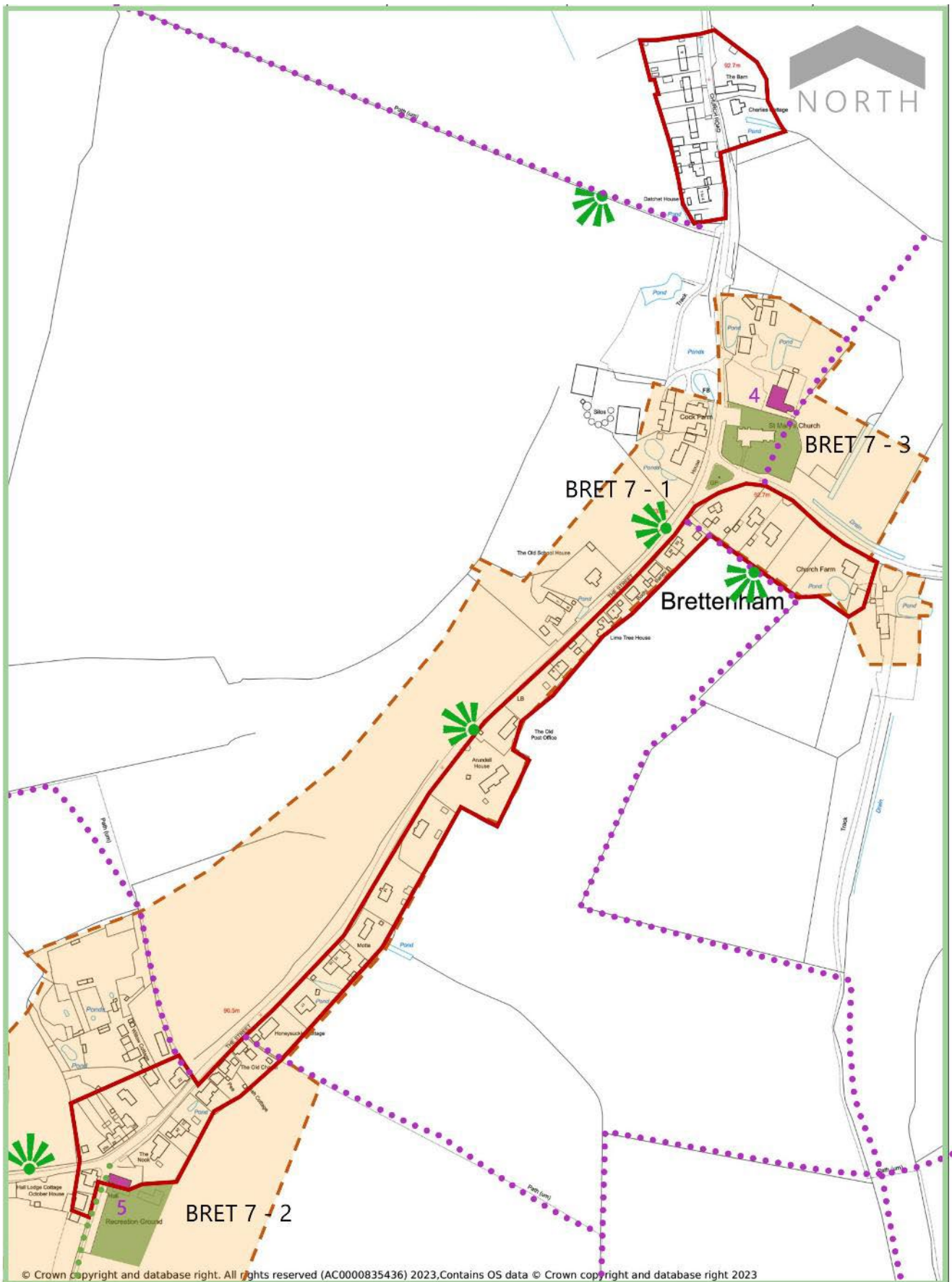




# Policies Map



# Village Centre Inset Map

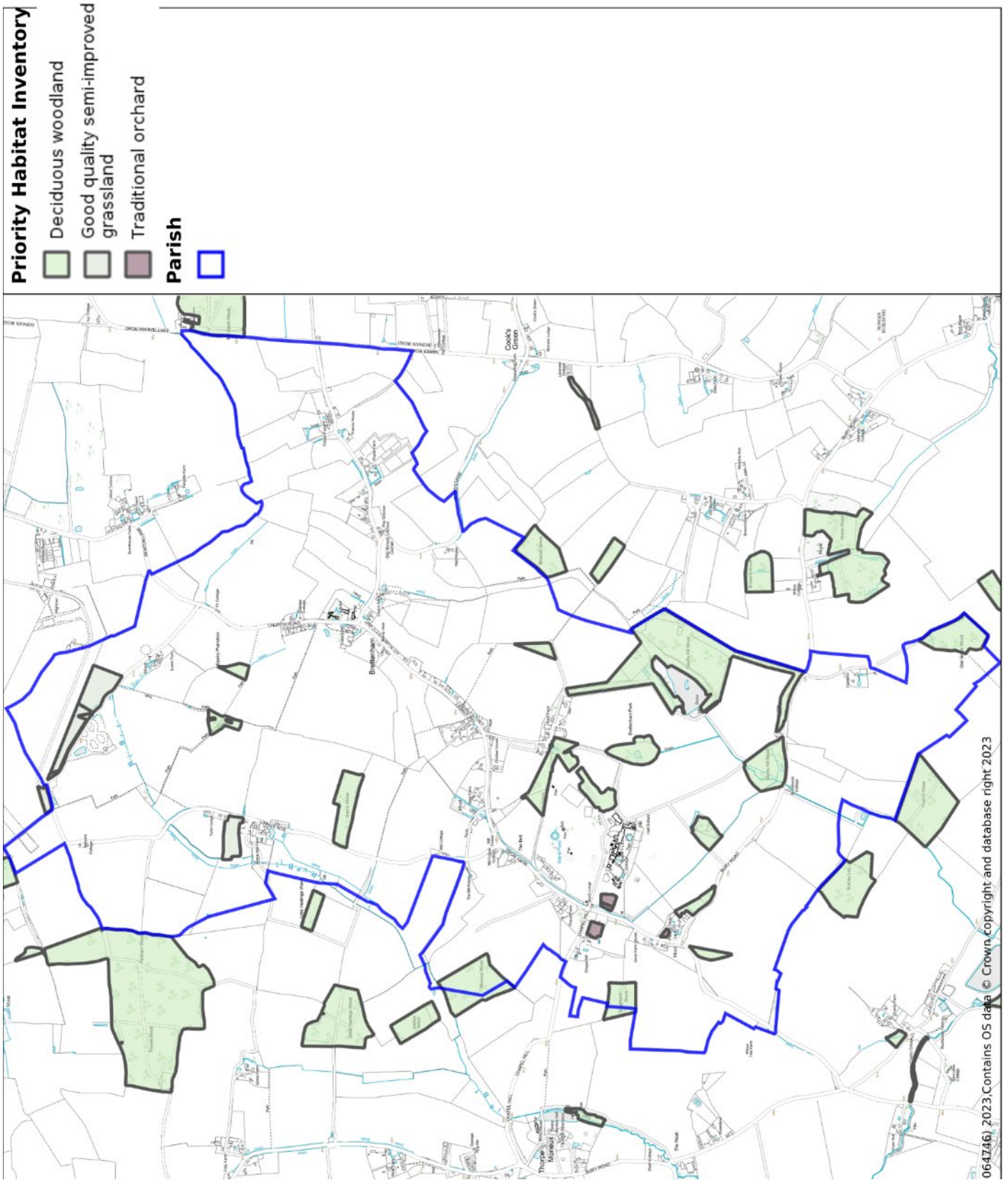








# Appendix A – Priority Habitats





## Appendix B – Listed Buildings within Brettenham Parish

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. Up to date information on listed buildings and other heritage assets should be sought from Historic England or another reliable source.

### **Grade I**

Church of St Mary the Virgin, Church Road

### **Grade II\***

Old Buckenham Hall School, Brettenham Park

Poplars Farmhouse (aka Popples), Bury Road

### **Grade II**

West Lodges & Gates, Brettenham Park

Hitcham Lodge, Bury Road

Dove Farmhouse, Bury Road

Crownings, Old School Road (Buxhall Road)

Church Farmhouse, Old School Road (Buxhall Road)

Francis House, Old School Road (Buxhall Road)

The Poplars, Old School Road (Buxhall Road)

Chapel Hill (House), Chapel Hill

Charlie' Cottage, Church Road

Cock Farmhouse, Church Road (known as St Mary's House)

Barn to north of Charlie' Cottage, Church Road

Ryev Hall, Dux Street

Tudor Lodge, Dux Street

Walnut Tree Cottage, Dux Street

Sparrows Pond, The Street

8 and 9 The Street

23 and 24 The Street

Thatched House, The Street

Rose Farmhouse, The Street

Pound Farmhouse, The Street

Brewers Cottage, The Street

## Appendix C – Design Guidelines

Source : Brettenham Design Guidance and Codes AECOM 2021

### **Settlement Pattern**

- New development should conform with the historic linear settlement pattern and scattered farmsteads.
- The existing network of Public Rights of Way should be retained as part of new development proposals.

### **Green spaces, public realm and streetscape**

- New development should provide sufficient green space appropriate to the location and size of the dwelling, including front and rear gardens and grass verges. Typically, no more than 50% of a dwelling's plot should be built on, a 'plot ratio' that reflects development patterns in the village and conforms with the National Model Design Code guidance for suburban and village locations (paragraph 52).
- Existing green spaces should be retained and enhanced.
- Existing trees and hedgerows should be retained in new development proposals to help reinforce the existing pattern of vegetation.
- Materials used in the public realm should be of high quality and respond to, and enhance, the rural character of the settlements.

### **Pattern and Layout of buildings**

- New development proposals should respond to development types reflecting local and regional characteristics, including scale and form.
- New development should be responsive to the plot widths, proportions, building lines and positions within the plots of existing development.
- Buildings should not front directly onto streets but should be set back from the street behind a front garden.
- New development proposals should be situated in a way to complement the layout of the street or blend with the surrounding landscape.

### **Views and landmarks**

- New development should not disrupt the visual setting of local landmarks including St. Mary's the Virgin Church, Old Buckenham Hall and surrounding parkland.
- Proposals for new development should demonstrate consideration of visual connections with characteristic landmarks.
- New development proposals should not be visually intrusive. This should be achieved through appropriate scale and design, including screening where appropriate.

### **Boundary Treatments**

- New development should use boundary features which allow for visual connections with the streets, are complementary to the streetscape and enhance the rural character of the village. The use of panel fencing in publicly visible boundaries should be avoided.
- The materials proposed for new boundary fences and walls should be of high quality, responding to the village character and have strong attention to architectural detailing.
- The maximum height of a hedge, wall or other boundary features should not generally exceed 1.2m.
- New development should follow a boundary line consistent with existing development.

### **Building heights and roofline**

- Height of new development should respond to adjacent buildings and generally should be no higher than two storeys.
- New development should consider pitched and hipped roofs to correspond with the historic character of the area.



- Typical roof features such as dormer windows, gables with bargeboards, decorative ridge features on thatched roofs, chimney stacks should be considered in new development proposals to reflect and enhance the historic character of the area.

### **Building modifications, extension and plot infill**

- Extensions should be appropriate to the scale, massing and design of the original building and complement the streetscape.
- Alterations and extensions of historic buildings should respect the original building. Replacement of historic and traditional features, such as timber windows and doors with uPVC and other non-traditional materials should be avoided.
- Extensions are more likely to be successful if they do not exceed the height of the original or adjacent buildings. Two storey extensions should be constructed with the same angle of pitch as the existing roof.
- The design, materials and architectural detailing of extensions and infill development should be high quality and respond to the host building and local character.
- The impact of infill development on the neighbouring properties should be considered.
- Infill development should correspond with the character of the existing building on the plot, both in terms of the pattern of development and design of the house. Issues of sufficient space, local vernacular, privacy, loss of trees needs to be considered.

### **Locally characteristic architectural details**

- Architectural detailing in development proposals should enhance the rural character and contribute to the sense of place.
- Future development should consider casement and sash windows with glazing bars to reflect the historic character of existing buildings.
- Future development should consider emphasising doorways by simple porches or doorcases.
- The choice of exterior colour should help integrate new building into its context.

### **Vehicle Parking**

- When needed, residential car parking can be on-plot side, front, garage, or courtyard parking.
- For family homes, cars should be placed at the side (preferably) or front of the property. For small developments, a rear court is acceptable.
- Car parking design should be combined with landscaping to minimise the visual impact of parked vehicles.
- Parking areas and driveways should be designed with permeable paving.
- When placing parking at the front, the area should be designed to minimise visual impact and to blend with the existing streetscape and materials. The aim should be to keep a sense of enclosure and to avoid continuous areas of car parking in front of dwellings. This can be achieved by means of walls, hedging, planting, and the use of quality paving materials.
- Parking bays and spaces should be designed for easy access by wheelchairs, loading carts, and buggies.
- Provision of electric vehicle charging points should be considered.

### **On-Plot Side or Front Parking**

- On-plot parking can be acceptable when it is combined with high quality and well-designed soft landscaping. Front garden depth from pavement back should be sufficient for a car.
- Boundary treatment is the key element to help avoid a car-dominated character. This can be achieved by using elements such as hedges, trees, flower beds, low walls, and high-quality paving materials between the private and public space.
- Hard standing and driveways should be constructed from permeable materials to minimise surface water run-off.

### On-Plot Garages

- Where provided, garages must be designed either as free-standing structures or as an extension to the main building. In both situations, it must complement and harmonise the architectural style of the main building.
- Often, garages can be used as a design element to create a link between buildings, ensuring continuity of the building line. However, garages should not be prominent elements.
- It should be noted that many garages are not used for storing vehicles, and so may not be the best use of space.
- Considerations must be given to the integration of bicycle parking and/or waste storage into garages.

### **Materials**

- Materials used in new developments should demonstrate an understanding of local and regional character and build upon the sense of place.
- High quality roof materials consistent with the rural character of the village should be used in new development. Concrete tiles should be avoided.
- New development proposals are likely to be more successful if they comprise high quality, traditional materials such as red and white brick, flint, render and black weatherboarding.
- Materials for alterations and extensions should be high-quality and retain or, if possible, enhance the character and appearance of the host building and the surrounding area.

### **Sustainability**

- Energy efficient technologies and strategies, including passive solar heating, cooling and energy efficient landscaping which are determined by local climate and site conditions, should be considered and incorporated in new and existing buildings.
- Renewable sources of energy such as solar panels should be implemented to new development proposals where appropriate.
- New development proposals should consider Sustainable Drainage Systems (SuDS) to manage surface water in a sustainable way to reduce flood risk and improve water quality.
- New development proposals should consider use of permeable surfaces including unbound gravel, clay pavers, or stone setts to increase capacity of the ground to absorb the runoff water and reduce risk of surface water flooding.
- New development proposals should consider bioretention systems including soak away and rain gardens along verges and in semi-natural green spaces to enable the water to infiltrate the ground and reduce runoff of water into the sewer system. Vegetation should be selected to sit cohesively within the surrounding landscape and reflect the character of the parish.
- New development proposals should consider rainwater harvesting options to capture and store rainwater as well as those enabling the reuse of on-site grey water.



