

Babergh District Council



Copdock & Washbrook Neighbourhood Plan 2023 - 2037

Submission Consultation Responses

In April 2024, Copdock & Washbrook Parish Council (the 'qualifying body') submitted a new draft Neighbourhood Plan to Babergh District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Tuesday 7 May until Friday 21 June 2024

Sixteen representations were received. They are listed below and copies are attached.

The Parish Council were also given an opportunity to respond to any new issues raised by the consultees listed below. Their response is also included at the end of this document.

Ref No.	Consultee
1	Suffolk County Council
2	Babergh District Council
3	Sproughton Parish Council
4	Historic England
5	Natural England
6	Anglian Water
7	Environment Agency
8	National Landscape Team
9	Suffolk Wildlife Trust
10	National Highways
11	Sport England
12	Artisan Planning & Property Services Ltd (obo clients)
13	Phase 2 Planning (obo Suffolk County Council)
14	Resident - Ward
15	Resident - Herd
16	Resident - Tyler
17	Response from Copdock & Washbrook Parish Council

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(1) SUFFOLK COUNTY COUNCIL

Date: 21 June 2024
Enquiries to: Georgia Teague
Tel: 01473 265054
Email: neighbourhoodplanning@suffolk.gov.uk



Babergh District Council,
Endeavour House,
8 Russell Road,
Ipswich, Suffolk,
IP1 2BX

Dear Mr Bryant,

Submission Consultation version of the Copdock & Washbrook Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Copdock & Washbrook Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Where amendments to the plan are suggested added text will be in *italics* and deleted text will be in strikethrough.

Adaptable and accessible homes

SCC notes that objective 4 states: "Provide new homes that meet the accessibility and space requirements for the lifetime of residents". However, it is not clear how the plan implements this objective.

Chapter 5.5 of the Housing Needs Assessment indicates clearly that there is an ageing population in Copdock & Washbrook. The final bullet-point of paragraph 103 states; Whilst the demand for three-bedroom homes will be significant, it is also important to acknowledge that the smaller dwellings will also have an important role to play in terms of catering for the growing older population. They have the potential to allow older households to downsize (which will make existing larger family housing available for those in need). Moreover, they also have the potential to be more affordable to younger households.

Data accessible via the Suffolk Observatory¹ shows a mid-2020 estimate of the population for Copdock and Washbrook village is 1,192. Of these, 26.8% of residents are aged 65+ which is above the England average of 18.5% and clearly displays an ageing population. With respect to the population data, it is important to ensure the needs of residents are catered for, recognising the likely increase of co-morbidities as people get older.

A two-bedroom bungalow is typically more expensive than a two-bedroomed house, due to the larger footprint of the property. Many young people starting on the property ladder are likely to want small properties for their first-time homes i.e., one or two bedrooms.

Therefore, building smaller 1-2 bed homes to be adaptable and accessible (i.e., built to M4(2) standards) means that it can meet the needs of a lifetime and can be adapted to meet the needs of an ageing occupant, and it does not restrict or exclude the younger buyers and occupants.

Whilst there is mention in Policy C&W3 of bungalows being “particularly supported”, it is suggested that there could be provision for homes that are adaptable to M4(2) standards. This can help meet the needs of elderly and frail residents, allowing them to maintain independence for longer, but without restricting the needs of younger people and families.

It is therefore recommended that the following is added to Policy C&W3, to show support for homes that are adaptable, and help to meet Objective 4:

“Within the wider mix of dwellings on housing developments, support will be given for the provision of homes that are adaptable and accessible (meaning built to optional M4(2) standards), in order to meet the needs of the aging population, without excluding the needs of the younger occupants and families. The incorporation of single storey bungalows would be particularly supported.”

Following guidance from footnote 52 in the NPPF December 2023 “Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.”

Whilst SCC acknowledges that the Ministerial Statement 2015 referenced in the Consultation Statement states that neighbourhood plans should not set additional technical standards; SCC was not proposing that the plan should impose a requirement for M4(2). SCC recommends that the plan set out a positive position towards proposals which contain homes built to those standards, in the same way that the neighbourhood plan states the support for bungalows. This will help the plan meet the needs of a wider range of groups including older and vulnerable people, reflecting paragraph 61 of the NPPF.

¹ <https://www.suffolkobservatory.info/>

This additional text into Policy C&W3 would also mean the plan meets its own Objective 4, in providing accessibility requirements for the lifetime of residents.

Local Green Spaces

As part of our Pre-Submission response, SCC noted that there were no justifications for the designations of the Local Green Spaces of this plan. The Consultation Statement stated that “An additional appendix will be added to the Plan to demonstrate how the Local Green Spaces meet the NPPF criteria”.

However, this does not appear to have been added to the Appendices of the Reg16 version of the plan, nor appear to have been added to the parish council webpages.

It is strongly recommended that the justification of the designations is provided, to ensure the Local Green Spaces are designated in accordance with paragraph 106 of the NPPF 2023.

If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Georgia Teague
Senior Planning Officer (Growth)
Growth, Highways, and Infrastructure

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(2) BABERGH DISTRICT COUNCIL

Our ref: Copdock & Washbrook NP R16 Response

Dated: 21 June 2024

From: Planning Policy Team, Babergh DC

To: Ann Skippers (Independent Examiner)

cc: Copdock & Washbrook Parish Council / Ian Poole (NP Consultant)

Sent by e-mail

Dear Ann,

Reg 16 submission draft Copdock & Washbrook Neighbourhood Plan 2023 - 2037 Representation from Babergh District Council

This response is made for and on behalf of Robert Hobbs (Corporate Manager for Strategic Planning).

In our Regulation 14 consultation response (April 2023) we noted that this new draft Plan was essentially a repeat of the March 2022 document, minus two specific policies and their supporting text. What comments we had were, for the most part, limited to the wider planning context relevant at that time and to some overlooked mapping issues. While most of these have been addressed, because of the time that has elapsed between the two formal consultation periods, some further updates are now necessary. These and our other comments are set out below:

Joint Local Plan references

The changes made to Chapter 3 and elsewhere are noted. Some paragraphs still refer to the 'emerging' Joint Local Plan, so need updating accordingly. They are paragraphs 1.10, 5.6, and 10.3. Please also see our comments below and under the Chapter 8 sub-heading re paragraph 8.9.

Para 6.3: In the last part of the first sentence, amend this to read: ' in order for it to conform with the adopted Joint Local Plan as it currently stands.'

Para 6.5: Our Joint Local Plan does provide guidance on the delivery of affordable housing schemes, but perhaps not at a level of detail some expect. A Supplementary Planning Document on Housing is also in preparation but has yet to be adopted. For now, we suggest that paragraph 6.5 be amended based on an equivalent paragraph in the recently published Pre-submission draft Tattingstone Neighbourhood Plan which, at paragraph 6.9, says:

Joint Local Plan Policy LP07: Community-led and rural exception housing, provides guidance on both community led schemes (which must be initiated by a legitimate community group and has general community support) in addition to the more traditional rural exception sites. The policy does not however, include sufficient detail in terms of local housing needs, therefore proposals will be required to also comply with the following policy:'

The above may also render paragraph 6.6 of the draft Copdock & Washbrook NP obsolete.



Babergh and Mid Suffolk District Councils
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
Telephone: (0300) 1234 000
www.babergh.gov.uk / www.midsuffolk.gov.uk

Chapter 6 (other points)

Para 6.4: The first bullet point in para 6.4 refers to a ‘sponsored’ Housing Needs Survey’. Given that the word ‘sponsored’ may have certain financial connotations, we suggest to the Parish Council that they use the more generic word ‘support’ instead.

- *A need to be established, normally identified through a detailed local housing needs survey with support from the Parish Council.*

Policy C&W 3 - Housing Mix

This policy builds on what was policy C&W 5 in the 2022 version plan by adding in detail on the preferred percentage mix of bedroom types. We did not comment on this policy in our Reg 14 responses but, with hindsight, now feel that it may not be so easy to interpret going forward. With the addition of a new paragraph of supporting text (see below) we suggest this could easily be fixed:

6.XX The percentages set out in Policy C&W 3 relate to overall housing needs. The unit mix needs of different tenures will vary. As such, the policy allows for different tenures to vary from the percentages set out, for example to meet identified affordable housing needs. Developments should do this whilst seeking to meet the overall needs of the parish'

Chapter 8

Para 8.9: For context, this should now read as follows:

'The ~~adopted~~ 2006 Babergh Local Plan continued to designates land in the northern part of the parish, primarily associated with the Belstead Brook valley, as SLA. However, ~~the emerging Joint Local Plan does not propose the continuation of~~ this designation was not carried forward into the Joint Local Plan.'

Para 8.15 is another part of this Plan that has now been overtaken by events. We recommend that it be amended to read as follows (or as guided by the Examiner):

In November 2021 the Environment Act received Royal Assent. This introduced a system that required all new developments to deliver a minimum 10 per cent biodiversity net gain (BNG). British Standard for Biodiversity Net Gain (BS8683) provides a standard for designing and implementing such requirements. Unless exemptions apply, BNG became mandatory for all new developments in April 2024.

Policy C&W 11 - Important Views, and Policies Maps:

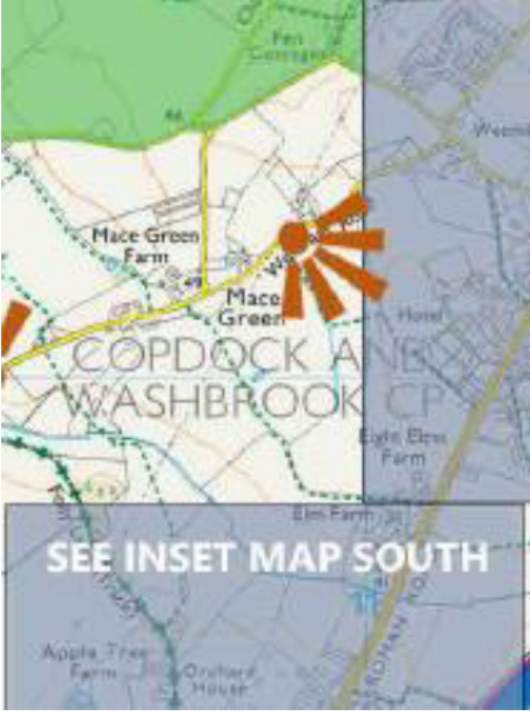
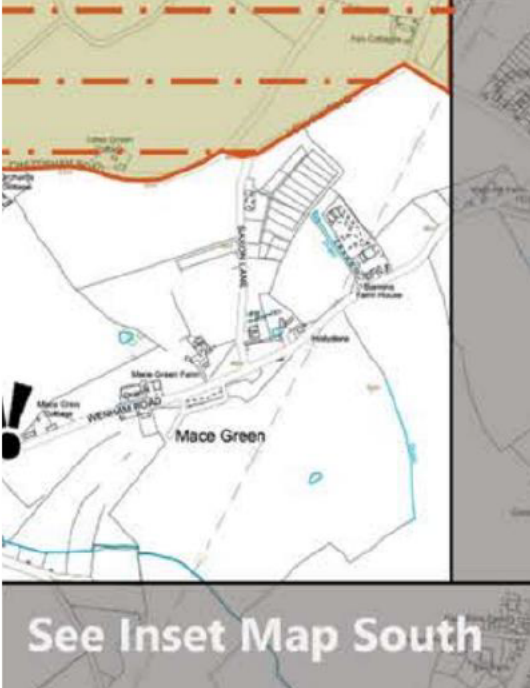
Our Regulation 14 comments [see pg 60 - 61 of the Consultation Statement] refer.

We see that the location point for View 3 is now shown on Inset Map – North (i.e., the view on London Road adjacent to the allotments) but that the location point for **View 4** still appears to be missing from the main Policy Map on page 37.

For reference, comparison screenshots from the 2021 referendum version NP and this new 2024 submission draft NP are shown on the next page.

Can the Parish Council confirm whether or not this map still needs amending?

Screenshot below right shows View 4 missing from the 2024 Submission Draft NP

2021 Referendum Version NP	2024 Sub Draft NP
 <p>SEE INSET MAP SOUTH</p>	 <p>See Inset Map South</p>

We trust that these comments and observations are helpful.

Kind regards,

Paul Bryant
Neighbourhood Planning Officer
Babergh & Mid Suffolk District Councils
T: 01449 724771 / 07860 829547
E: communityplanning@baberghmidsuffolk.gov.uk

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(3) SPROUGHTON PARISH COUNCIL

E from: Rhona Jermyn | Sproughton Parish Council
Rec'd: 14 May 2024
Subject: Copdock & Washbrook Neighbourhood Plan

Dear Babergh Community Planning,

With regard to the above as a neighbouring parish and statutory consultee, we support the updated version of the Copdock and Washbrook Neighbourhood Plan.

We congratulate the NP team on their efforts, and the benefits that a completed plan will bring to the community and parish as a whole.

Kindest regards

Rhona Jermyn
Sproughton Parish Council

Web: [Sproughton Parish Council](#)

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(4) HISTORIC ENGLAND



Historic England

Mr P Bryant
Planning Policy Team,
Babergh District Councils,
Endeavour House,
8 Russell Road,
Ipswich, Suffolk, IP1 2BX

Direct Dial: [REDACTED]

Our Ref: PL00792741

7 June 2024

Dear Mr Bryant,

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

We welcome the production of this neighbourhood plan, and are pleased to note the inclusion of Section 2, setting out the parish's local historical context. We also particularly welcome Objectives 10 and 11, and Policy C&W 12 - Heritage Assets. Overall, we consider the plan meets the Basic Conditions with respect to the historic environment.

We do not consider it necessary for Historic England to provide further detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed 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/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. 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 NP, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours Sincerely

Ross McGivern
Historic Places Advisor
E-mail: ross.mcgivern@historicengland.org.uk

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

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(5) NATURAL ENGLAND

Date: 19 June 2024
Our ref: 475568
Your ref: Copdock & Washbrook Neighbourhood Plan

Mr Paul Bryant
Babergh & Mid Suffolk District Councils

BY EMAIL ONLY

communityplanning@baberghmidsuffolk.gov.uk



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

Dear Mr Bryant

Copdock & Washbrook Neighbourhood Plan - SEA & HRA Screening Consultation

Thank you for your consultation on the above dated 05 June 2024.

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.

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.

Natural England does not have any specific comments on this draft neighbourhood plan.

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.

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](#) .

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](#).

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.

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.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

(6) ANGLIAN WATER

E from: Carry Murphy | Spatial & Strategic Planning Manager

Rec'd: 4 June 2024

Subject: Consultation on R16 Copdock & Washbrook NP (Babergh DC)

Dear Sir/ Madam,

Anglian Water has previously submitted comments on the pre-submission version (Reg 14) of the neighbourhood plan.

We welcome the amendments in the submission version of the neighbourhood plan, following our comments and recommended changes to Policy C&W 8 – Local Green Spaces and Policy C&W 14 - Sustainable Construction Practices.

I can confirm, I have no further comments to make and wish the neighbourhood plan group every success in taking this forward.

I should be grateful if you could acknowledge receipt of this representation and keep me updated on further progress made on the neighbourhood plan.

Yours faithfully,

Carry Murphy

Chartered Town Planner - MRTPI

**Spatial and Strategic Planning Manager – Sustainable Growth
Quality & Environment**



Web: www.anglianwater.co.uk

Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire. PE29 6XU

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(7) ENVIRONMENT AGENCY



Paul Bryant
Babergh and Mid Suffolk District Council
Spatial Planning Policy Team
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2024/129474/01-L01
Your ref: Reg 16 Consultation
Date: 21 June 2024

Dear Paul

CONSULTATION UNDER REG' 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 THE COPDOCK & WASHBROOK NEIGHBOURHOOD PLAN 2023 - 2037

COPDOCK & WASHBROOK

Thank you for consulting us on the pre-submission plan for the Copdock and washbrook 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.

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 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:

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 the neighbourhood plan area along Bildeston Brook.

On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. Nevertheless, we recommend the inclusion of relevant policies to cover the management of flood risk. Allocation of any sites and any windfall development delivered through the Plan period should follow the sequential approach. National Planning Policy Framework (NPPF) paragraph 167 sets this out.

Water Resources

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk).

Contaminated Land

For land that may have been affected by contamination as a result of its previous use or that of the surrounding land, sufficient information should be provided with

any planning application to satisfy the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk Assessment (including a desk study, conceptual model and initial assessment of risk), and provide assurance that the risk to the water environment is fully understood and can be addressed through appropriate measures. This is because Aldham Neighbourhood Plan Area is a source protection zone 2 and 3 as well as on a principal Aquifer. For any planning application the prior use should be checked to ensure there is no risk of contamination.

Source Protection Zones

Your plan includes areas which are located on Source Protection Zones 2 and 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>

Biodiversity Net Gain

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. Identifying sites for the delivery of Biodiversity Net Gain could lead to habitat improvements in your area. Biodiversity Net Gain is a system that delivers habitat improvements on any local sites including Local Wildlife Sites to ensure that there is no loss of habitats from new development. Identifying areas that could benefit from management for conservation within your area could enable habitat to be created closer to development sites in your plan area, providing local ecological enhancement.

Informatives

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on 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](#)

We trust this advice is useful.

Yours sincerely

Mr Andrew Thornton
Planning Advisor

Direct dial: +44 20 3025 3127

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(8) NATIONAL LANDSCAPE TEAM

E from: Beverley McClean | National Landscape Planning Officer

Rec'd: 10 May 2024

Subject: Consultation on R16 Copdock & Washbrook NP (Babergh DC)

Thank you for consulting the National Landscape team on the Copdock and Washbrook Neighbourhood Plan Regulation 14 Consultation.

The Neighbourhood Plan Area falls outside the Dedham and Suffolk Coast & Heaths AONB boundaries and Project Areas. For this reason the National Landscape team will not be providing any comments on this Neighbourhood Plan.

Kind regards

Beverley



**Suffolk & Essex
Coast & Heaths**
National
Landscape



Dedham Vale
National
Landscape
& Stour Valley

Beverley McClean

National Landscape Planning Officer

Email: beverley.mcclean@suffolkandessex-NL.org.uk

Phone: 01394 445225

Pronouns: She/Her

National Landscape Office, Saxon House, 1 Whittle Road, Hadleigh Industrial Estate, Ipswich, Suffolk, IP2 0UH

www.coastandheaths-NL.org.uk

www.dedhamvale-NL.org.uk

[Ends]

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**Suffolk
Wildlife Trust**

**(9) SUFFOLK WILDLIFE
TRUST**

Suffolk Wildlife Trust

Brooke House

Ashbocking

Ipswich

IP6 9JY

01473 890089

teamwilder@suffolk

wildlifetrust.org

suffolkwildlifetrust.org



Copdock & Washbrook NP Consultation

c/o Planning Policy Team

Babergh District Council

Endeavour House

8 Russell Road

Ipswich

Suffolk, IP1 2BX

24th May 2024

RE: Consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 | The Copdock & Washbrook Neighbourhood Plan 2023 - 2037

Thank you for sending us details of the Copdock & Washbrook Neighbourhood Plan, Regulation 16 consultation, please see our comments below:

Suffolk Wildlife Trust are pleased to see that the Copdock & Washbrook Neighbourhood Plan recognises the importance of biodiversity and seeks to ensure its protection and enhancement and support the objectives to “Maintain and improve the biodiversity assets of the parish” and “Mitigate the impact of development on designated habitats including the Stour and Orwell estuaries”. We believe that there is evidence and rationale supporting that the plan could go even further, to deliver more for wildlife and a urge this to be considered.

Biodiversity

Suffolk Wildlife Trust information, obtained from Suffolk Biological Information Service¹, shows that part of *Sproughton Park County Wildlife Site* lies within the parish; this is not noted within Paragraph 8.13 of the draft Plan which implies no local wildlife sites are present. Other CWSs lie adjacent to the parish, in the parishes of Great Wenham, Little Wenham, Belstead, and Bentley, these could also be mentioned within the plan. Identifying or mapping CWSs in or adjacent to the parish in an included figure would follow National Planning Policy Framework Para.185².

Policy C&W9: Biodiversity

Suffolk Wildlife Trust are happy that this policy offers suitable protection for biodiversity and seeks to support nature recovery. The policy could go further by including reference to including integrated bird and bat boxes and ensuring that new development includes hedgehog highways.

Suffolk Wildlife Trust acknowledge this policy is in keeping with mandatory net gain. However, we suggest that the plan could, and should, go further and include an *ambition* to deliver net gain beyond the minimum requirement of 10%. This aspiration is also put forward by Babergh & Mid-Suffolk District Councils in their draft Supplementary Planning Document *Biodiversity and Trees*³ where an aspiration for 20% is put forward. It is important to highlight that 10% is, “In simple terms, is the lowest level of net gain that [DEFRA] could

¹ <https://www.suffolkbis.org.uk/>

² https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

³ Section 4.14. Babergh and Mid Suffolk District Councils, *Biodiversity and Trees Supplementary Planning Document Consultation*, <https://baberghmidsuffolk.oc2.uk/docfiles/77/Biodiversity%20and%20Trees%20SPD%20Consultation%20Document%20-%20May%202024.pdf>

confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives.”⁴

Maidstone Borough Council recently included a requirement for a minimum 20% net gain in their emerging local plan⁵. The plan went to review after changes to Planning Practice Guidance (PPG)⁶ where changes to the wording may suggest that delivering above 10% may be undesirable and requires justification. However, the inspector’s report of the Maidstone Local Plan⁷ noted that there was suitable evidence and justification provided. Suffolk Wildlife Trust therefore believe that, with suitable justification, the Copdock & Washbrook Neighborhood Plan should put forward aspirations for net gain to deliver above the statutory minimum level of 10%; this will provide greater confidence that net gains, which the plan seeks to ensure, will be delivered. We provide what we believe as suitable evidence to support this aspiration as an appendix to this letter.

Policy C&W 10: Recreational Disturbance Avoidance and Mitigation

Suffolk Wildlife Trust support this policy, which reinforces the importance and need to protect of the Stour and Orwell Estuaries from an increase in recreational pressure from new development.

Yours sincerely,

Alex Jessop
Planning & Advocacy Officer
planning@suffolkwildlifetrust.org

⁴ DEFRA Impact Assessment: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf

⁵ Maidstone Borough council, 2021, Local Plan review, Draft Plan for Submission (Reg.19), <https://drive.google.com/file/d/13MfNeKxSGxYIfCCKZcP6-ggua2EFlnt/view>

⁶ <https://www.gov.uk/guidance/biodiversity-net-gain>

⁷ Spencer, D., 2024, Report to Maidstone Borough Council, Report on the Examination of the Maidstone Local Plan Review, PINS/U2235/429/10, <https://drive.google.com/file/d/1BpJD7DyWVbclC0QQ2pLhEY5o3hWXo1Mb/view>

Appendix: Evidence to support and justify aspiration for 20% BNG within Policy C&W9

The inspector's report of the Maidstone Local Plan⁷ Para.368 states;

- *“The policy sets a requirement for a minimum 20% BNG. Whilst the national BNG requirement is set at a minimum 10%, there is nothing in the NPPF 2021 or the Environment Act 2021 to suppress local authorities seeking more ambitious minimum targets through Local Plans provided it is justified. The environmental baseline in the SA [Sustainability Appraisal] confirms that Kent has not met its 2010 Biodiversity targets, and is unlikely to have met 2020 targets, and this is set to decline further without targeted interventions. In this regard I was referred to the collaborative approach being taken across Kent, including through the Kent Nature Partnership and from Kent Wildlife Trust⁸ that is seeking a minimum 20% BNG in Local Plan policies. This would also align with widespread representations at earlier stages of Plan preparation for a stronger policy framework for biodiversity, as set out in the Environment Topic Paper.”*
- (Para 369) *“At a more local level, seeking a 20% BNG would clearly align with the objectives and ambitions set out in the Council’s Climate Change and Biodiversity Strategy and Action Plan⁹. This includes a number of actions for the Borough Council including implementing a Biodiversity Strategy and a Nature Recovery Strategy and working with others to deliver landscape scale biodiversity initiatives. The minimum 20%, measured against the latest metric, is strongly supported by Natural England and KCC, amongst others. SA has also taken account of 20% BNG, both as part of Policy LPRSP14(A) and in the strategic policies for Heathlands and Lidsing, which has informed an assessment that it can be anticipated to have positive effects in mitigating the effects of development.”*

Suffolk Wildlife Trust therefore put forward the following rationale for delivering BNG above 10% in Suffolk:

- The 2023 State of Nature Report¹⁰ highlights that, despite considerable conservation efforts over recent decades, many species continue to decline. This includes, of note to Suffolk:
 - The abundance of 753 terrestrial and freshwater species has on average fallen by 19% across the UK since 1970. Within this average figure, 290 species have declined in abundance (38%).
 - The UK distributions of 4,979 invertebrate species have on average decreased by 13% since 1970. Stronger declines were seen in some insect groups which provide key ecosystem functions such as pollination (average 18% decrease in species’ distributions).
 - Since 1970, the distributions of 54% of flowering plant species and 59% of bryophytes (mosses and liverworts) have decreased across Great Britain.
 - 10,008 species were assessed using Red List criteria. 2% (151 species) are extinct in Great Britain and a further 16% (almost 1,500 species) are now threatened with extinction.
- The UK Government’s 25-Year Environment Plan¹¹ includes the following targets, which are more likely to be met should BNG deliver levels above 10%:
 - Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition

⁸ <https://www.kentwildlifetrust.org.uk/blog/what-is-biodiversity-net-gain>

⁹ <https://www.kent.gov.uk/environment-waste-and-planning/climate-change/climate-emergency-statement>

¹⁰ https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf

¹¹ <https://assets.publishing.service.gov.uk/media/5ab3a67840f0b65bb584297e/25-year-environment-plan.pdf>

- Creating or restoring 500,000 hectares of wildlife-rich habitat outside of the protected sites network, focusing on priority habitats as part of a wider set of land management changes
- Increasing woodland in England in line with our aspiration of 12% cover by 2060; this would involve planting 180,000 hectares by the end of 2042.
- The UK Government has committed to delivering “30by30” on Land in England¹²:
 - In 2020, the government committed to protecting 30% of the UK’s land by 2030 (30by30). Thanks to UK leadership, a global 30by30 target was adopted at the UN Biodiversity Summit COP15 in December 2022, as part of an ambitious Global Biodiversity Framework.
 - In October 2023, Wildlife and Countryside Link published the 30by30 in England 2023 Progress Report¹³. This found:
 - The area of England effectively protected for nature is still hovering around 3.11% on land and at maximum 8% at sea.
 - The UK is one of the most nature-depleted countries in the world, sitting in the bottom 10% globally for biodiversity remaining.
- At a minimum, the UK has failed to meet 14 of the 19 Aichi biodiversity targets, the global nature goals the UK committed to meet by 2020¹⁴, which were put forward as part of a “2020 Vision”¹⁵.
- West Suffolk Council have declared a climate and environment emergency¹⁶ and following the introduction of the Environment Act 2021, West Suffolk Council as a public authority must consider how to conserve and enhance biodiversity in the area. This ‘biodiversity duty’ requires West Suffolk Council to “*consider what we [WSC] can do to conserve and enhance biodiversity.*”
- East Suffolk Council have, alongside declaration of a climate emergency in 2019, now declared a biodiversity emergency¹⁷.
- Suffolk County Council have declared a climate emergency¹⁸ and will continue to change approaches to progress to net zero, and work to encourage others' behavior changes, stating, “*Both are needed to protect and enhance Suffolk's environment and biodiversity*”.
 - SCC state, we will fulfil this ambition by: *Promoting biodiversity and conserving natural habitats and open spaces*¹⁸.
- Babergh Mid-Suffolk District Council declared a climate and biodiversity emergency in 2019¹⁹ and in September 2019, councilors approved commitments to enhance and protect biodiversity across the district.
 - Furthermore, and as noted above, the new draft SPD Biodiversity and Trees includes an ambition to deliver 20% net gain³.

¹² https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering_30by30_on_land_in_England.pdf

¹³ https://wcl.org.uk/assets/uploads/img/files/WCL_2023_Progress_Report_on_30x30_in_England_1.pdf

¹⁴ <https://publications.parliament.uk/pa/cm5802/cmselect/cmenvaud/136/136-summary.html>

¹⁵ <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

¹⁶ <https://www.westsuffolk.gov.uk/environment/climate-change/index.cfm>

¹⁷ <https://www.bbc.co.uk/news/uk-england-suffolk-68370018>

¹⁸ <https://www.suffolk.gov.uk/council-and-democracy/our-aims-and-transformation-programmes/our-ambitions-for-suffolk/protecting-and-enhancing-our-environment>

¹⁹ <https://www.babergh.gov.uk/documents/d/mid-suffolk/climate-change-and-biodiversity-annual-report-mid-suffolk>

Our ref: NH/24/06231

Your ref: Copdock & Washbrook NP Consultation (R16)

Copdock & Washbrook NP Consultation
c/o Planning Policy Team
Babergh District Council
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Shamsul Hoque
Assistant Spatial Planner
National Highways
Spatial Planning
Operations (East)
Woodlands
Manton Lane
Bedford MK41 7LW

12 June 2024

Via email to: communityplanning@baberghmidsuffolk.gov.uk

Dear Sir/Madam,

**CONSULTATION UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING
(GENERAL) REGULATIONS 2012 (AS AMENDED)**

THE COPDOCK & WASHBROOK NEIGHBOURHOOD PLAN 2023 - 2037

Thank you for your correspondence, dated on 03 May 2024, notifying National Highways of the consultation under Regulation 16.

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 the Copdock and Washbrook Neighbourhood Plan we have responsibility for the trunk road, A12 and A14.

On behalf of National Highways, I have reviewed different policy (C&W1 - C&W17) details within the submission draft neighbourhood plan which covers the plan period from 2023 to 2037. The Copdock and Washbrook Neighbourhood Plan focuses on six themes, namely: 1) Housing, 2) Built Environment and Design 3) Business and Employment 4) Infrastructure and Services 5) Natural Environment, and 6) Highways and Movement.

National Highways supports the vision statement outlined within this Submission Draft Copdock and Washbrook Neighbourhood Plan 2023-2037.

Please find National Highways comments below:

Policy (C&W 2 and 3) on Housing:

The current neighbourhood plan does not need to allocate any further housing sites as 33 new homes, previously granted permission are in the process of construction. Para 6.2 details sites which have permission but have yet to be complete their construction:

Policy (C&W 17 and 18) on Highways and Movement

The Old London Road (former A12 trunk road) is a dual-carriageway road with a 50 mph speed limit despite dwellings and businesses having direct access onto the road. The Old London Road runs parallel to the current A12 trunk road, which is used as a quicker alternative route when the A12 or A14 are congested due to accidents or breakdowns.

The proposed improvements of aimed at reducing the safety risk on this stretch of Old London Road are welcome. (para 11.4)

National Highways would like to work closely with you on the Old London Road's proposed development scheme between Capel St Mary A12 Junction 32B and Ipswich A14 Park and Ride, the schematic plan shown on Figure 5 supporting the Policy C&W 18.

National Highways like to inform that the DfT's Road Investment Strategy (RIS) 3 covering the period of 2025-2030 has yet to be announced and may not include the A12/A14 Copdock Interchange as a pipeline scheme developed in RIS 2.

Basic Condition:

National Highways have no comment to the current consultation query on whether this draft plan as submitted meets the Basic Condition tests set out in Paragraph 8(1)(a)(2) of Schedule 4B to the Town & Country Planning Act 1990.

We do not have any more comment of this.

Please contact us PlanningEE@nationalhighways.co.uk if you require any clarification.

Yours faithfully,

S. H.
Shamsul Hoque
Assistant Spatial Planner
Shamsul.Hoque@nationalhighways.co.uk

Informative:

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The National Planning Policy Framework supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

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(11) SPORT ENGLAND

E from: Planning.Central@sportengland.org
Rec'd: 10 June 2024
Subject: Copdock & Washbrook Neighbourhood Plan

Sport England would like to offer the following comments on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 103 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood

area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

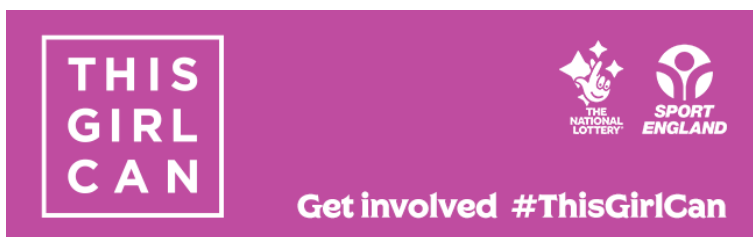
(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Technical Team

E: planning.central@sportengland.org



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](mailto:Gaile.Walters@sportengland.org)

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(12) ARTISAN PLANNING & PROPERTY SERVICES

E from: Leslie Short | Artisan Planning & Property Services
Rec'd: 24 May 2024
Subject: Copdock & Washbrook NP Reg 16
Attached: SKM_C224e24052415530.pdf / 3327147 Appeal Decision.pdf

I need to make two representations on behalf of clients with land located within the neighbourhood plan area.

- 1) In relation to the inset map (North) for the village the extent of land with planning permission for an employment use is not accurately recorded on the NP drawing (see attached).
- 2) Appendix 1 to the Reg 16 document lists the schedule of dwelling permissions as not complete as at the 1st of January 2023. This obviously does not include the land recently allowed on appeal for the erection of nine dwellings on a site adjacent to the White House, Copdock (decision 3327147 attached). The Table at Appendix 1 can therefore be misinterpreted, and we suggest that it is updated.

Both of these are material considerations in the determination of future planning applications and the NP should accurately record the position if it is to be adopted.

Kind regards,

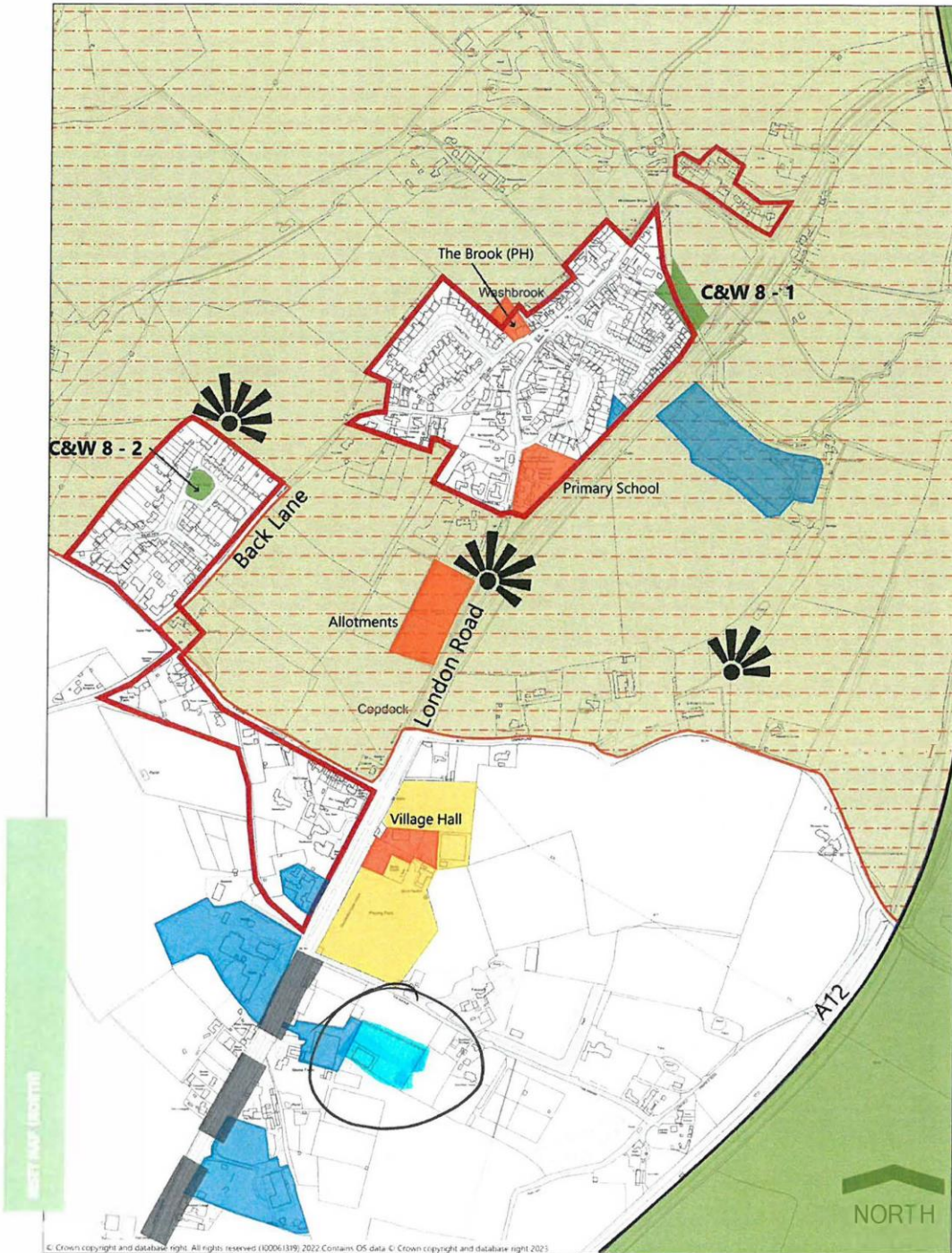
Leslie Short BA MRTPI MRICS
Director
Artisan Planning & Property Services

W: www.artisan-pps.co.uk
T: 01473 832995
M: 07780 692025



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INSET MAP - NORTH



Appeal Decision

Site visit made on 27 February 2024

by C Carpenter BA MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 3 May 2024

Appeal Ref: APP/D3505/W/23/3327147

Land adjacent to White House, Old London Road, Copdock IP8 3JH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Ponder Construction against the decision of Babergh District Council.
 - The application Ref is DC/22/06242.
 - The development proposed is creation of 9 no. bungalows plus associated garages and parking, with alterations to the existing access.
-

Decision

1. The appeal is allowed and planning permission is granted for creation of 9 no. bungalows plus associated garages and parking, with alterations to the existing access at land adjacent to White House, Old London Road, Copdock IP8 3JH in accordance with the terms of the application, Ref DC/22/06242, and the plans submitted with it, subject to the conditions in the attached schedule.

Preliminary Matters

2. The description of development in the heading above has been taken from the planning application form. In Part E of the appeal form it is stated that the description of development has not changed but, nevertheless, a different wording has been entered. Neither of the main parties has provided written confirmation that a revised description of development has been agreed. Accordingly, I have used the one given on the original application, but I have removed words that do not describe the development in the interests of clarity.
3. The Council's first reason for refusal refers to Policies CS2 and CS15 of the Babergh Core Strategy 2014 (CS). A new Babergh and Mid Suffolk Joint Local Plan Part 1 (JLP1) was adopted in November 2023, after the Council's decision on the planning application subject of this appeal. The Council's appeal statement post-dates adoption of JLP1: it states the CS Policies previously referred to are no longer relevant and identifies the JLP1 Policies it considers relevant to the appeal. The appellant has had the opportunity to comment on the JLP1 Policies referred to by the Council. Accordingly, these are the Policies I shall consider in my decision.
4. I understand the emerging Copdock and Washbrook Neighbourhood Plan is at an early stage of preparation. In accordance with paragraph 48 of the Framework, I give this emerging plan minimal weight.
5. The National Planning Policy Framework (the Framework) was updated in December 2023, during the course of this appeal. I invited the parties to consider whether the revised Framework had relevance to this appeal and have taken account of the comments received in my decision.

Main Issues

6. The main issues are:
- whether the proposal would be in a suitable location with respect to the settlement pattern; and
 - the effect of the proposal on the integrity of protected European sites.

Reasons

Settlement pattern

7. The appeal site is located outside of defined settlement boundaries so is in a countryside location for planning policy purposes.
8. The introduction to JLP1 Policy SP03 states that a review of settlement boundaries will be undertaken as part of a subsequent Part 2 Plan, but that for at least the short-medium term the existing boundaries, applied through Policy SP03, will be likely to enable the District's development needs to be met whilst also recognising the intrinsic character of the countryside. Given this statement reflects the consideration of the need for a review of settlement boundaries in the JLP1 Examination Inspectors' Report, including in relation to the Framework, I consider Policy SP03 up to date for the purposes of this appeal and I accord it full weight.
9. Under section 2 of Policy SP03, development will normally only be permitted outside of settlement boundaries where one of four alternative criteria are met. There is no suggestion that any of these criteria applies in this case.
10. Given the proximity of existing dwellings and rural settlements, the proposed development would not result in an isolated home in the countryside for the purposes of paragraph 84 of the Framework.
11. As part of its consideration of the location of the site in relation to settlement boundaries, the Council raises a concern with access to services and sustainable transport links. The site is relatively close to Capel St Mary, which has a range of local services and facilities. Although there is no dedicated footpath to Capel St Mary, it is within reasonable cycling distance and is directly served by a bus that stops very near to the appeal site. The bus service also provides access to Ipswich, with its much wider offer of services, facilities and onward public transport connections. In addition, there are some local facilities within reasonable walking distance in Copdock, along a dedicated footpath that is clearly separated from the busy road.
12. Therefore, whilst I recognise future residents of the proposed development would be likely to use the private car for some journeys, especially if they are elderly, I am satisfied on the evidence before me – including my observations on site - that the location offers adequate access to services and a genuine choice of transport modes.
13. My finding is consistent with the Council's own statement that the site is well connected to surrounding settlements and that residents would not be solely reliant on the private motor vehicle, when it granted planning permission for nine dwellings on the site in February 2019¹. There is little evidence to persuade me the circumstances affecting the site's connectivity have materially changed since that decision.
14. The Council has drawn my attention to an appeal decision² for a nearby site. I only have partial extracts of the decision before me. Nevertheless, notwithstanding the commentary on access to Capel St Mary and Copdock, the Inspector concluded the proposal could demonstrate some functional relationship to an existing settlement. It was the proposal's failure to demonstrate justifiable need for the development, as required by CS policies then in force but since superseded, that led the Inspector to find a conflict with the development plan. Consequently, the circumstances in that appeal are not sufficiently closely related to those before me to lead me to a different conclusion on this main issue.

15. For the above reasons, I conclude the conflict with Policy SP03 of JLP1 means the proposal would not be in a suitable location with respect to the settlement pattern. However, the development would have adequate access to services and a genuine choice of transport modes. In this respect, the development would accord with the Framework, despite its countryside location.

Integrity of protected European sites

16. The appeal site lies within the Zone of Influence of the Stour and Orwell Estuaries Special Protection Area (the SPA), which is also a Ramsar Site. SPAs are European sites protected under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations).
17. The SPA comprises extensive mudflats, low cliffs, saltmarsh, small areas of vegetated shingle, areas of low-lying grazing marsh and several freshwater pools. In summer, it supports important numbers of breeding avocet, and in winter it holds major concentrations of waterbirds, especially geese, ducks and waders. Regularly occurring migratory species include dark-bellied brent goose, redshank, knot and dunlin.
18. The SPA provides an important recreational and economic resource. On the evidence before me, the proposal, particularly when combined with other development in the area, would be likely to have a significant effect on these protected European sites. Consequently, under the Habitats Regulations, an appropriate assessment is required in relation to the effect of the development on the integrity of the sites. This responsibility falls to me as competent authority in the context of this appeal.

Appropriate Assessment

19. The conservation objectives of the SPA aim to ensure the integrity of the sites is maintained or restored. This includes maintaining or restoring the extent, distribution, structure, function and supporting processes of the habitats; and the population and distribution of each of the qualifying features within the sites. There is a threat to their integrity from public access and disturbance, including from recreational activities such as walking, dog walking and water sports.
20. It is likely the occupants of the proposed dwellings could visit the SPA, resulting in increased recreational activity that could disturb the protected habitats and birds within the site. Therefore, the development, alone and in combination with other development, would be likely to have significant adverse effects on the integrity and conservation objectives of the SPA
21. The parties have agreed a financial sum in accordance with the Suffolk Coast European Sites Recreational Disturbance Avoidance and Mitigation Strategy (Suffolk Coast RAMS). The sum would be put towards a programme of strategic mitigation measures. Natural England has been consulted as part of this appropriate assessment and has confirmed that the Suffolk Coast RAMS measures are sufficient to avoid an adverse impact on the integrity of the SPA.
22. Although not contained within a legal agreement, I am satisfied on the evidence before me that the agreed sum has been received by the Council for the purposes of contributing to the strategic mitigation measures described above. I therefore find there would be no adverse effect from the proposed development on the integrity of the SPA as a designated European site. Consequently, the proposal would be consistent with the Framework, which requires adequate mitigation if significant harm to sites protected under the Habitats Regulations cannot be avoided.

¹ Planning permission ref DC/18/05359

² Reference APP/D3505/W/19/3241314

Conclusion

23. For the reasons set out above, I conclude the proposed development would not have an adverse effect on the integrity of protected European sites.

Other Matters

24. The appeal site is within the setting of 'Woodsend and No 1 Woodsend' on London Road, which is a Grade II listed house divided into two dating from circa 1500 and later extended and restored in the 1980s. The significance of the listed building is derived primarily from its architectural features, including exposed timber frame, windows, casements and gables, crown post roof, arched doorways and large open brick fireplace. The setting of the building includes its location facing Old London Road. Although altered by road widening and more recent development, this setting contributes to the significance of the heritage asset because it is part of the context for the historic dwelling's location. The proposed development would not adversely affect this relationship, so the setting of the listed building would be preserved and there would be no harm to its significance as a heritage asset.
25. The Council's appeal statement identifies a conflict with JLP1 Policy LP24 on the basis that the proposal is not deemed to protect the character of the area and is of an inappropriate design. However, there is no pertinent evidence to substantiate these concerns. Moreover, this statement is contradicted by the finding in the Council's original decision report that the design of the proposal was acceptable. Further, the Council acknowledges in that report that the scheme's design has not changed significantly from that previously found acceptable and approved under application DC/18/05359. On the evidence before me, I see no reason to disagree with the Council's original assessment of design and the proposal's effect on the character and appearance of the area. I also see nothing in Policy LP24 that leads me to a different conclusion, and I find no conflict with this Policy. I also find no conflict with the Framework's objective of good design.
26. The Council also raises a concern in relation to Policy LP23 of JLP1, which relates to sustainable construction and design. The Council's statement in this regard is unsupported by evidence or explanation and accordingly I give it minimal weight.
27. The proposed energy efficiency measures would not weigh in favour of the development because they are required by other regulatory regimes.
28. The development would contribute nine units to the supply of housing, which would accord with the Framework where it seeks to significantly boost the supply of homes including through development of small and medium sized sites that can be built out relatively quickly. The proposal would also result in an economic benefit from construction and future occupiers' use of local services and facilities, which would help to maintain the vitality of rural communities in accordance with paragraph 83 of the Framework.

Conditions

29. I have considered the conditions put forward by the Council and have amended the wording where necessary in the interests of clarity and simplicity. In addition to the standard time limit condition, I have imposed a condition requiring that the development is carried out in accordance with the approved plans. This is in the interest of certainty.
30. The condition regarding surface water drainage is necessary to prevent hazards caused by flowing water or ice on the highway. It is a pre-commencement condition because these potential hazards could arise during construction so need to be prevented before construction works commence.

31. The conditions relating to vehicular access to the site and visibility splays are necessary for highway safety. They are pre-commencement conditions because potential risks to highway safety from construction vehicles entering and leaving the site require mitigation in advance of work starting.
32. Conditions to secure a Construction Management Plan (CMP) and restrict construction hours are necessary to protect the living conditions of neighbouring occupiers and for highway safety. Methods for disposal of construction waste, including the prohibition of burning, are adequately addressed in the CMP so a separate condition on this matter is not necessary.
33. The condition securing biodiversity mitigation measures, biodiversity enhancements and a lighting strategy is necessary for the conservation and enhancement of biodiversity, including protected species and habitats.
34. Conditions are necessary to ensure adequate provision for the safe manoeuvring and parking of vehicles, and secure cycle storage to promote active travel. The condition regarding refuse/recycling storage is necessary to achieve good refuse management.
35. Justification for a pre-commencement condition requiring approval of an acoustic assessment and details of potential mechanical ventilation in habitable rooms is not specific and precise enough to meet the tests of necessity and reasonableness.

Planning Balance and Conclusion

36. I have found the proposal conflicts with JLP1 Policy SP03. However, there would be access to services and a genuine choice of transport modes, despite the site's countryside location. The benefits of the proposal set out in other matters also weigh in favour of the development.
37. The Council states it can demonstrate a five-year supply of deliverable housing sites. As set out above, Policy SP03 is up to date for the purposes of this decision. Consequently, paragraph 11d) of the Framework is not engaged.
38. The Council states that the earlier permission for the appeal site (DC/18/05359) relied on a principle of development established through a preceding outline consent³, at which time the Council could not demonstrate a five-year housing land supply. Nevertheless, in its decision on DC/18/05359 the Council concluded that the limited harm from the location of the proposal outside a settlement was outweighed by its positive benefits, including the provision of new housing. This was notwithstanding that the Council could by that point demonstrate a five-year supply of housing.
39. There is no compelling evidence to persuade me that the benefits identified by the Council in its February 2019 decision would be materially different in this appeal, notwithstanding that permission Ref DC/18/05359 has lapsed.
40. Taking all this together, I conclude that other material considerations, including the Framework, indicate that a decision should be taken otherwise than in accordance with the development plan. Therefore, the appeal should be allowed.

C Carpenter

INSPECTOR

Schedule of conditions

- 1) The development hereby permitted shall begin not later than 3 years from the date of this decision.
- 2) The development hereby permitted shall be carried out in accordance with the following approved plans: 3819-05A Location Plan; 3819-03A Topographical Survey; 3819-06J Proposed Site Plan; 3819-07 Scheme Design on Topographical Survey; 3819-13 Proposed Plans and Elevations – Plot 1; 3819-14 Proposed Plans & Elevations – Plot 2; 3819-15B Proposed Plans & Elevations – Plot 3; 3819-21B Proposed Plans & Elevations – Plot 4; 3819-16 Proposed Plans & Elevations – Plot 5; 3819-17 Proposed Plans & Elevations – Plot 6; 3819-18A Proposed Plans & Elevations – Plot 7; 3819-20A Proposed Plans & Elevations – Plot 8; 3819-19 Proposed Plans & Elevations – Plot 9; 3819-11 Proposed Plans & Elevations – Shed; 3819-12 Proposed Plans & Elevations – Garages.
- 3) No development shall take place until details showing the means to prevent the discharge of surface water from the development hereby permitted onto the highway including any system to dispose of the water have been submitted to and approved in writing by the local planning authority. The approved details shall be implemented in full before the access to the development is first used and shall be retained thereafter.
- 4) No other part of the development hereby permitted shall commence until the new vehicular access has been laid out and completed in accordance with Drawing No. 3819-07 with a minimum entrance width of 5.5 metres for a shared surface access. The gradient of the vehicular access shall be no steeper than 1 in 20 for the first 5 metres measured from the nearside edge of the highway. The vehicular access shall be surfaced with a bound material for a minimum distance of 5 metres measured from the nearside edge of the metalled carriageway, in accordance with details that shall have previously been submitted to and approved in writing by the local planning authority. The vehicular access shall thereafter be retained in its approved form.
- 5) Vehicular visibility splays shall be provided as shown on Drawing No. 3819-07 with an X dimension of 2.4 metres and a Y dimension of 35 metres and 90 metres to the nearside edge of the carriageway. The visibility splays shall be provided before the access to the development is first used and shall be retained thereafter. Notwithstanding the provisions of Part 2 Class A of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction to visibility shall be erected, constructed, planted or permitted to grow over 0.6 metres high within the areas of the visibility splays.
- 6) Construction of the development hereby permitted shall be carried out in accordance with the Construction Management Plan - Revision 1, by Ponder Construction Ltd, dated 27 September 2022.
- 7) Notwithstanding condition No. 6, demolition or construction works shall take place only between 07:30 and 18:00 on Mondays to Fridays, 08:00 and 13:00 on Saturdays, and shall not take place at any time on Sundays or on Bank or Public Holidays.

³ Permission reference DC/17/06175

- 8) The biodiversity mitigation measures, biodiversity enhancements and lighting strategy recommended in the report titled Biodiversity Mitigation Enhancement and Lighting Strategy – Revision 1, by MHE Consulting, dated 3 April 2019, shall be carried out in full during the construction and/or operational phases of the development hereby approved, as specified in the report. The measures, enhancements and lighting associated with the operational phase shall be completed prior to first occupation of the development and shall be retained and maintained thereafter.
- 9) The development hereby permitted shall not be occupied until the areas within the site shown on Drawing No. 3819-07 and the document titled Energy and Sustainability Strategy Land Adjacent to White House, Copdock IP8 3JH - Revision A, by JS Lewis Ltd, dated November 2022 for the manoeuvring and parking of vehicles, including electric vehicle charging infrastructure, have been provided. These areas shall thereafter be kept available at all times for the manoeuvring and parking of vehicles and for no other purpose.
- 10) The development hereby permitted shall not be occupied until secure cycle storage has been provided in accordance with Drawing No. 3819-07. The secure cycle storage shall be retained and maintained thereafter for the parking of cycles and for no other purpose.
- 11) The development hereby permitted shall not be occupied until areas for the storage and presentation for collection/emptying of refuse and recycling bins have been provided in accordance with Drawing No. 3819-07. The refuse/recycling area shall be retained thereafter and used for no other purpose.

End of schedule

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(13) PHASE 2 PLANNING [Job Suffolk County Council]

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent, please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr Mike Spurgeon
Job Title (if applicable):	Associate
Organisation / Company (if applicable):	Phase 2 Planning
Address:	Skyline 120, 270 Avenue West, Great Notley, Braintree, Essex
Postcode:	CM77 7AA
Tel No:	07591 201 628
E-mail:	Mspurgeon@phase2planning.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Suffolk County Council
Address:	Constantine House, 5 Constantine Road, Ipswich, Suffolk
Postcode:	IP1 2DH
Tel No:	
E-mail:	

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.	1.5, 5.5, 6.2, 6.4	Policy No.	C&W1, C&W7, C&W10, C&W18
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications		Have Comments	X

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ...

Site Allocations for Residential Development

At the outset it is acknowledged in Paragraph 1.5 that the draft Neighbourhood Plan effectively replicates the previously submitted Neighbourhood Plan (dated December 2021). The main differentiator is that it is not proposed to allocate any sites for residential development - including the site that was formerly allocated under 'Policy C&W3 – Land south-east of Back Lane' for approximately 226 dwellings alongside associated development – and thus omits this policy alongside 'Policy C&W1 – Housing Development'.

The rationale for this is largely attributed to extant residential planning permissions for 33 dwellings within the administrative area as of 1st January 2023 (Paragraph 6.2), and the failure of the previous Neighbourhood Plan to pass the referendum (as discussed in 'The Copdock and Washbrook Neighbourhood Plan 2023-2037 Consultation Statement, February 2024').

On a related note, Paragraph 5.5 confirms that the settlement boundary for the built-up areas of the village is to reflect those contained within the 2006 Babergh Local Plan (albeit with some minor revisions). In particular, it paid due regard to the conclusions of the Landscape Appraisal which identified that further ribbon/ad-hoc developments along Old Ipswich Road should not be pursued as it would '*destroy the pattern of the settlement*' and would have a considerable impact on the wider landscape.

Commenting on the rationale behind the non-inclusion of any allocated sites within the draft Neighbourhood Plan, the Part 1 BMSDC Local Plan calculates that there is a need for 7,904 homes between 2018 and 2037, equating to 416 new dwellings per year. Whilst Paragraph 06.06 recognises that a notable proportion of the dwellings required are already accounted for via existing commitments, it confirms in Table 3 that there will be a shortfall of 1,191 dwellings within the Babergh district which necessitates the need for the Part 2 Local Plan to provide for and allocate land for new housing. While the Local Plan process has not progressed to a stage where any such allocations have been proposed, we consider that the rationale set out in Paragraph 6.2 of the draft Neighbourhood Plan to not allocate any sites for residential development represents something of a missed opportunity and does not enable the Neighbourhood Plan to set a positive framework and context for future development.

On the basis that approximately half of the committed housing sites have not yet commenced or where delivery timescales are uncertain (as confirmed in Appendix 1 – Schedule of Dwelling Permissions), there is no guarantee that all these existing or potential commitments will be

delivered or that sufficient provision will be made for the needs of residents across the district from other sites in other locations.

It is our view that the non-inclusion of this previously allocated site, or any part of this within the Neighbourhood Plan, fails to take the opportunity to positively influence the form, scale and location of any future growth of housing allocations in Copdock and Washbrook. The anticipated allocation of the site in question in Part 2 of the Babergh and Mid Suffolk Adopted Local Plan, (particularly in light of this having been identified in its predecessor document), reflects the position of Copdock and Washbrook within the Ipswich Fringe strategic growth area where it is expected that previously-identified sites would need to be taken forward in order to reflect the scale of growth and strategic priority identified in this area if the housing needs of the district are to be provided for in the most sustainable way.

Furthermore, the omission of the site prevents the realisation of various public benefits that would stem from residential development. These benefits include the support to and creation of local jobs during the construction process and the contribution that new housing would make to improving the vitality/viability of local shops and service. Perhaps most notably however would be the provision of a policy-compliant level of affordable housing which would come forward as part of any residential development. Paragraph 6.4 recognises that housing affordability remains a significant barrier for many people, and it will only be possible to remedy this situation if new affordable homes are provided and land identified for development in order to facilitate this.

The omission of any allocated sites also means that the Neighbourhood Plan area suggests that any future residential development proposals would be more likely to be speculative in nature. Ordinarily, when local planning authorities are unable to demonstrate a five-year housing land supply, the planning balance is automatically tilted in favour of development, which can promote the submission of speculative residential applications. However, a Written Ministerial Statement released in 2016 confirmed that if the Council can only demonstrate between a 3.00 and 4.99 five-year housing land supply, the tilted balance will still be engaged but “significant weight” is still to be attached to the policies contained within the Neighbourhood Plan (provided the said plan is less than 2 years old, and that it allocates sites for housing). As such, were the draft Neighbourhood Plan to allocate sites for residential development, its administrative area would benefit from additional protection from speculative housing applications, which could help to preserve the desired pattern of growth within Copdock and Washbrook.

The absence of an associated site allocation policy (formerly ‘Policy C&W3’) means that the draft Neighbourhood Plan would not be setting any site-specific policy requirements or parameters in order to shape or guide the principles for any new development. The absence of any such policy framework which was present in the previous iteration of the Neighbourhood Plan, means that site-specific aspirations such as retaining the allotments on their current site or improving the bus stops along Old London Road (potentially including real-time passenger information systems), would not be linked to the development proposals. This also misses the opportunity to shape and influence the form and scale of development in the form of an Illustrative Masterplan which could otherwise be used to set certain parameters and to ensure that any specific concerns or priorities that the communities may have are reflected. In short, it is regrettable that the absence of these policies and proposals from the draft Neighbourhood Plan means that it has severely restricted its ability to influence the design of any future residential development on this site.

Landscaping/Open Space

It is noted that the evidence base accompanying the draft Neighbourhood Plan includes an updated Landscape Appraisal (November 2023). The document considers the former draft allocated site (under ‘Policy C&W3 – Land south-east of Back Lane’), alongside a wider land

parcel, to constitute a valued landscape. Upon this recommendation, Paragraph 8.10 confirms that this area is to be brought forward as an Area of Local Landscape Sensitivity, as illustrated in Map 3.

We appreciate that, in the same paragraph, it details that the designation does not preclude any development from occurring in that area, but instead that proposals will need to be in harmony with the special character of the area. This translates into the requirements of 'Policy C&W7 – Area of Local Landscape Sensitivity' where submitted proposals will only be allowed where they protect and enhance its special landscape qualities, be sited to harmonise with the landscape setting, and provide suitable landscape mitigation measures.

It is our concern that this designation could serve to frustrate the delivery of future residential development on the site, where there could be potential difficulties in preserving all the special landscape qualities identified within updated Landscape Appraisal. This includes, most notably, its perceptual qualities of a lack of built development and closeness to nature, and its function as a setting to the settlement of Washbrook.

Indeed, Paragraph 6.4.4 of the updated Landscape Appraisal acknowledges that there is scope from a landscape perspective to accommodate additional development within the vicinity of the Elm Lane/Church Lane junction; it identifies that there is an opportunity to develop a more 'central village' character in this location, which is especially important as Paragraph 6.4.1 admits that there has been a dilution in the sense of place and a lack of strong focal points arising from a dispersed and occasionally sporadic pattern of development in recent decades. Therefore, the introduction of the previously allocated site would provide the opportunity to provide a consolidated, well-considered layout that brings these features to central Copdock.

We do not formally object to allocating the allotments, to the north of Old London Road, as an Existing Green Space.

Other Comments

'Policy C&W1 – Spatial Strategy' outlines that the focus for new development will be within the settlement boundaries which, as previously alluded to, will largely reflect those contained within the 2006 Babergh Local Plan. We would highlight here that, given the identified shortfall of 1,191 dwellings within the Babergh district, there is a strong likelihood that these settlement boundaries will need to be reviewed to assist in accommodating this identified need.

'Policy C&W10 – Recreational Disturbance Avoidance and Mitigation' states that large residential developments (50 units or more) must provide Suitable Alternative Natural Greenspace (SANG) on-site or access to sufficient space. It would be our suggestion that it is clarified here that this requirement will be assessed through a project level Habitat Regulations Assessment, in consultation with the local planning authority and Natural England.

'Policy C&W18 – Highway Improvements on Old London Road' details that when new proposals come forward, they will be required to contribute towards highways improvements on Old London Road, encouraging the greater use of sustainable transport modes, with highway schemes that encourage the greater use of Old London Road for sustainable transport modes being supported. Nevertheless, it is our view that the imposition of this development management policy is somewhat unrealistic given that there are no sites allocated for residential development that could contribute to meeting its stated aspirations – especially its intended highway improvements.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ...

As per our observations above, it is our view that the development potential of the land parcel which was formerly allocated under 'Policy C&W3 – Land south-east of Back Lane' should be integrated into this emerging Neighbourhood Plan in order to capitalise upon the range of public benefits outlined. Nevertheless, if the current position in relation to this site remains the same in the final draft of the Neighbourhood Plan, we suggest that the document includes supporting text setting out the local community's aspirations and how any residential development can best reflect these. Whilst any stated aspirations would not have the same status and would carry less weight than a formal allocation, this would nonetheless provide a means through which the aspirations and views of the community can be clearly expressed in a formal planning document, and through which the form and design of some or all of the scheme could be communicated.

Further to the above, it is requested that given the recognised development potential of the land in question, the proposed designation of this as an 'Area of Local Landscape Sensitivity, is removed. The identification of this within the current draft of the Neighbourhood Plan has the potential to frustrate the future delivery of residential development on the site. Alternatively, if the said designation were to be retained, it would be our recommendation that the wording of 'Policy C&W7 – Area of Local Landscape Sensitivity' is suitably amended so as to more positively reflect the presumption in favour of sustainable development advocated by the National Planning Policy Framework. Our suggested wording would be as follows:

"Development proposals in the Area of Local Landscape Sensitivity, as identified on the Policies Map, will be [actively supported] where they:

- i. Protect, [and where possible enhance], the [main] special landscape qualities of the area, as identified in the Landscape Appraisal; and
- ii. Are designed to harmonise with the landscape setting of the site; and
- iii. Provide [adequate] landscape impact mitigation measures as part of the proposal"

[] = our suggested alteration.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held, please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ...

We do not consider that a formal hearing as part of the independent examination of the draft Neighbourhood Plan is necessary. Rather, we would much like to hold an ongoing dialogue with the Copdock and Washbrook Parish Council during the preparation of the draft Neighbourhood Plan to ensure that any future residential development brought forward in the parish meets the needs of its current and future residents.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

Publication of the Independent Examiners Final Report	X
The 'making' (adoption) of the Copdock & Washbrook NP by Babergh District Council	X

Signed: Mike Spurgeon

Dated: 21/06/2024

(14) RESIDENT - WARD

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent, please complete Part's A & B

Part A: Respondent	
Title / Name:	(Mr) Ward
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.	9.7, 11.3, 11.4 & 11.6	Policy No.	C&W 13 & 18
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	X
Support with modifications		Have Comments	

Please give details of your reasons for support / opposition, or make other comments here:

9.7 Large scale development of housing slightly uphill from established flood risk areas centred around The Brook/Old London Road crossing will worsen existing flooding problems by removing valuable drainage space and adding further sources of water that need to soak away. Fields to both sides on Old London Road, especially the south, flood several times annually currently, and building large housing estates will worsen the flood risk perhaps even causing surface water to impact established housing, such as the end of Pearsons Way.

11.3 The local plan appears to be tailored towards encouraging the provision of a large volume of housing onto development sites on each side of Old London Road. This would substantially increase the volume of traffic on the road and worsen the situation, as well as destroying the nature of the village. The existing infrastructure (e.g. schools) could not cope. The statement that the road is no longer used for horse riding is also not true, and appears to be a deliberate misrepresentation of the situation. This is, however, also irrelevant as there are multiple minor routes immediately adjacent that are in effective shared use involving horses, pedestrians and vehicles.

11.3 The proposed reduced speed limit is pointless. The current 50mph limit is not being enforced. There have been speed related road deaths here in recent years. Safety could be improved by enforcing this, for example with average speed cameras, and improving the junction of Chapel Lane and Old London Road where there is poor visibility for pedestrians crossing, there are near misses every day and there are regular vehicle accidents. Traffic lights would remove these problems. Furthermore, the statement that businesses and properties have direct access onto the road is meaningless. This is true of almost every dual carriageway in the country, most of which have a 70mph speed limit.

11.4 Closing one carriageway will not reduce the volume of traffic, particularly when incidents at the Copdock Interchange or on the A14/Orwell Bridge result in traffic using Old London Road to avoid jams or closures. This happens approximately once a week. Conversely, reducing the size of the carriageway will cause traffic to back up further and it will be extremely difficult for residents to leave their properties. It will worsen delays. Improvements to the A12 and A14 are the only thing that will reduce traffic. In addition, the current dual carriageway actually makes crossing the road easier than crossing a two way, high traffic volume road would be.

11.6 Closing the southbound carriageway and turning it into a cycle way would result in residents without off road parking provision to have difficulty parking their vehicles. In addition, those with off road parking on their property would need to cross the cycle route, which would result in accidents and likely deaths to cyclists. In addition, it really is quite remarkable to imagine that there is any need for a cycle super highway between Capel St Mary, the park and ride site and “beyond” (wherever that may be). The number of cyclists per week that would use even a fully developed cycle route here, a route with steep gradients, could be counted on the fingers of one hand. This really is clutching at straws, a statement concocted purely to support a pre-determined aim.

What improvements or modifications would you suggest?

Improve the Chapel Lane junction.

Enforce the 50mph speed limit.

Do not introduce parking and traffic issues by closing a carriageway or building a pointless cycling highway.

Do not allow large housing developments to tarnish the area and cause traffic/flooding/infrastructure issues.

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held, please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

If required, I would be happy to attend a hearing to elaborate on and be questioned on my comments. However, I also feel that the author of the plan should be called to explain the deliberate misrepresentations they have made.

Please indicate (tick) whether you wish to be notified of:

Publication of the Independent Examiners Final Report	X
The ‘making’ (adoption) of the Copdock & Washbrook NP by Babergh District Council	X

Signed: (Mr) Ward	Dated: 13th May 2024
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(15) Resident - Herd

Rec'd: 21 June 2024

Subject: Copdock & Washbrook Neighbourhood Plan response

Attached: Concerns of Old London Road; Poll from Copdock & Washbrook Bulletin Board,

Dear Sir/ Madam,

Please find enclosed [...] response forms and supporting documentation regarding the Copdock and Washbrook proposed neighbourhood plan.

I would like to summarise my main objections regarding the proposed changes to Old London Road, as I do not believe they adequately address the issue of speed. Many residents believe that the present speed limit is justified and that enforcement through average speed cameras is required to prevent motorists from exceeding the speed limit.

Many villagers are concerned that large-scale changes to Old London Road and its speed limits would open up the eight sites mentioned in the landscape appraisal that supports the neighbourhood plan. There is nothing within the neighbourhood plan indicating that any assessments have been carried out, making it a misleading document. The Babergh Joint Plan does not allocate housing within Copdock and Washbrook, so I question why the Parish Council has conducted an assessment of eight sites within the landscape appraisal and proposed major changes to Old London Road, which will eventually result in these sites being developed.

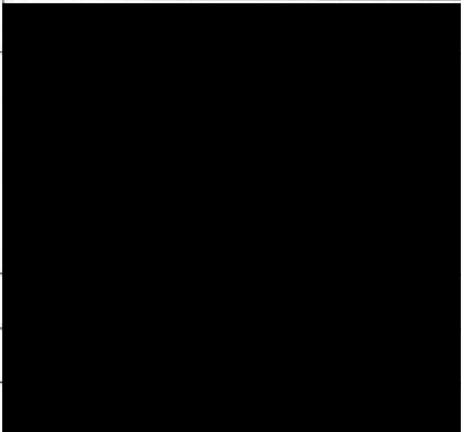
There is no mention of the dangers of Swan Hill within the report, as highlighted in my response form.

I also wish to note that this plan has already been rejected once at referendum, and there is very little change from the original neighbourhood plan, particularly with reference to the landscape appraisal, which still includes the eight sites. As there are no real changes to the plan since it was originally put to referendum, it should be rejected by Babergh District Council. Meaningful changes should be made instead of bringing back the old plan for another referendum.

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent, please complete Part's A & B

Part A: Respondent	
Title / Name:	
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.	11.2 to 11.6	Policy No.	Evidence Gathering
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support	Oppose	X
Support with modifications	Have Comments	X

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ...

This section is flawed as it only concentrates on Old London Road and does not mention Swan Hill which is the road towards Sproughton. The section seems to assume that a 50 mph speed limit on this road is inappropriate and that the majority of village residents support lowering the speed limit.

I recently conducted a poll on our local community website, which has over 1,200 members. The results are enclosed with this document. As evidenced by the comments within, most people favour average speed cameras to enforce the speed limit on this road. Lowering the speed limit will not enhance safety without enforcement.

We had 33 respondents to the survey, representing a return rate of 2.75%, which is higher than a typical YouGov poll for a general election, which normally has a 0.08% return rate.

The question asked was: "Do you agree with the proposed changes to Old London Road?"

- 25 voted NO
- 8 voted YES

It only concentrates on cycle paths on the old London Road which I believe to be a perfectly safe road to cycle on if the present 50 more lost speed limit is enforced with average speed cameras.

The much more dangerous road for cycling in the C&W area is the road up to Sproughton, which is about to undergo major development with Wolsey Grange 2, expected to add a further 750 houses, along with another 450 houses in nearby Sproughton and Bramford. This will likely result in a considerable increase in cyclists travelling both down and up Swan Hill. Therefore, if there is any area in the locality that urgently needs a cycle path and pedestrian path, it is this one. A path could easily be constructed on the Suffolk County Council farmland that runs alongside this road. Additionally, I previously mentioned that a small council estate could be built on Taylor's Farm, which could also be connected to this footpath.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ...

I believe the issue of speed could be resolved by installing four sets of average speed cameras:

1. The first set as you enter the village of Copdock off Old London Road.
2. The second set just before the hotel.
3. The third set just after the turning for Elm Lane.
4. The fourth set just before the turning up Swan Hill.

There would be corresponding cameras on the other side of the carriageway, making a total of eight cameras.

A similar project was recently undertaken in Martlesham, and it would be interesting to know the cost compared to the last budget I saw for these proposed changes, which was approximately £1.2 million and would not solve the speed problem.

I would support installing a crossing near the village hall as this makes perfect sense. Additionally, I believe a barrier should be built in the middle of the carriageway to prevent HGVs from making U-turns.

To discourage HGVs from using Old London Road, a weight limit of 7.5 tonnes should be imposed on the road towards Sproughton (Swan Hill) in both directions. Access to Gladwell's from the A12 would still be possible, but this would stop Old London Road from being used as a rat run for HGVs.

The proposed CCTV cameras could also act as a deterrent for anyone wishing to break this weight limit, as it would be easy to collect licence plate numbers of any offenders.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held, please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

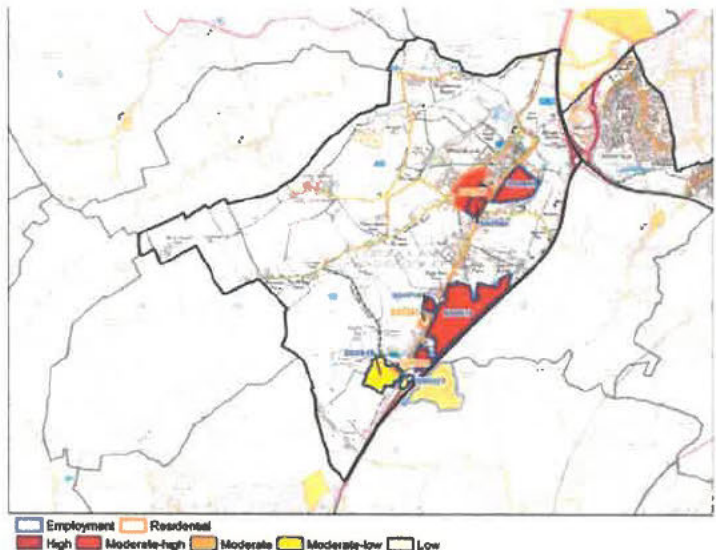
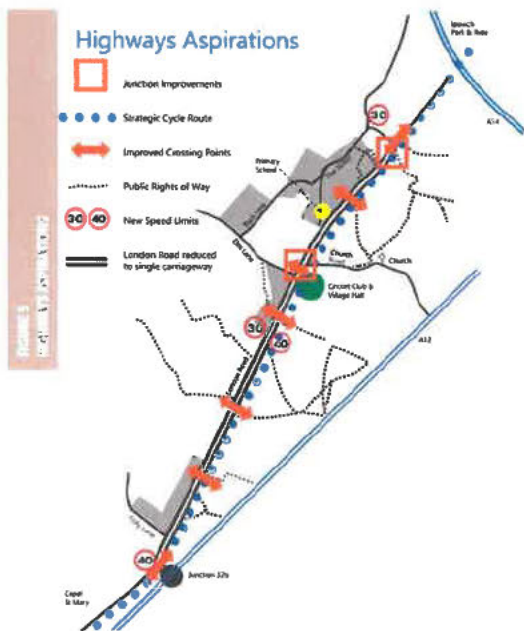
I consider that a hearing should be held because ...

Please be as brief and concise as possible ...

I believe a hearing should be held as there are strong feelings against the proposed changes within this neighbourhood plan for Old London Road, which would not provide any real control over the speed limit. Furthermore, I believe that this reduction in the speed limit would open up numerous sites along Old London Road, as the landscape appraisal frequently mentions improving gateway access. When comparing the proposed changes to Old London Road with the eight sites assessed in the landscape appraisal, my point becomes quite clear.

The neighbourhood plan emphasises not making C&W parts of Ipswich but fails to provide any information on why assessments have been carried out on these eight sites.

I have attended many Parish Council meetings and was a member of the Parish Council at one point. During those meetings, it was mentioned that there would be no sites within the neighbourhood plan. Therefore, I must reiterate that the landscape appraisal appears to be a flawed document if this is the case.




continue on separate sheet if necessary

Please indicate (tick) whether you wish to be notified of:

Publication of the Independent Examiners Final Report	<input checked="" type="checkbox"/>
The 'making' (adoption) of the Copdock & Washbrook NP by Babergh District Council	<input checked="" type="checkbox"/>


Signed: [Redacted Signature] **Dated:** 21/06/2024

 Top contributor · 3 days ago · 🌐

Community Unofficial Poll: Your Opinion Matters!

Hello everyone,

As part of our vibrant community of over 1200 members, many of whom have a vested interest in the area, I want to hear your thoughts on an important local issue.

The Copdock and Washbrook Parish Council  has proposed changes to Old London Road, and want to gauge the level of support for these proposals. Here are the key points:

1. **Cycle Lane Installation**: The council plans to install a cycle lane along the northbound carriageway by closing one of the existing carriageways to traffic.
2. **Speed Limit Reduction**: A proposed reduction in the speed limit, as detailed in the diagram below. Note: there is no mention of average speed cameras to enforce these new limits.

The June draft minutes of the parish council indicate that over 14 sites have been assessed. These changes are likely to enhance gateway access, as highlighted in their landscape appraisal supporting the neighborhood plan.

It's crucial for the parish council to understand the community's perspective. While we value individual opinions, the collective voice of the community is what truly matters.

Poll Question:

Do you agree with the proposed changes to Old London Road?

- Yes
- No

Could you start your comment with a simple yes or no, likes of posts will not be counted

Please cast your vote and share your thoughts in the comments!

Thank you for your participation in shaping the future of our community.

Important point.

I am an outspoken person against large-scale development in our local area. I feel it is important to mention that I am not on the Copdock and Washbrook Parish Council and that this is an unofficial poll

No. You can put up as many speed signs as you like but you will still get the same boy/girl/them racers doing 90. Junction improvements and improving crossing points sounds like a waste of money they work well at the moment just need speed cameras to slow the traffic down travelling through the area. I think reducing it to a single carriage way would be a very very bad idea if you get a slow moving lorry or farm vehicle you are stuck and all cars wanting to turn off at those junctions will be blocking off the road if a few need to turn off at the same time.

Yes. Improved crossing points would be welcomed. I was caught in a not at fault accident at one of those a few years ago that wrote my car off. They are unofficial and dangerous. There's a pile of rubbish on one of them instead of a proper bollard 😞 Dedicated pedestrian crossing points and a speed limit would make the road safer to access footpaths and use the footpath along the road. Walking on the narrow footpath with cars travelling at 50mph is quite scary.

No . Speed cameras would be cheaper and more effective I agree with above comment thanks .

No - 50 is a good speed. Just needs enforcing

No

NO

No! All it will do is make the road more dangerous, residents won't be able to get out of driveways in busy times, can you imagine the carnage when A12/A14 bridge gets closed & it's single lane?

Cycle lane? There is already a pathway for that!

Who will do 30.

It's a cut through & by very nature it will always be a road used by people trying g to save 5 mi s. They speed at 50.

Average speed Camera's would fix it all ... for alot less expense. You speed you get what's coming.

that's a No then !!

No, I'm a resident of the road and the dual carriageway isn't the issue, it is needed to relieve the traffic at the roundabout, it's the speed of vehicles which is the issue and the only way to control that it is speed cameras.

On a separate note we're now seeing a large rise in container HGVs using the small gaps to cross over to the lorry yard on the opposite carriageway and I've seen a number of cars come to abrupt stop nearly going into the side of them, plus they are damaging the grass in the middle.

Yes I think it should go down to 30. Lots of kids walk to school and to many cats are being killed

No. Speed cameras would be more effective.

No - speed cameras are the only answer

Yes. I like closing one lane for a cycle/horse lane. And slowing down the carriage way can only help to make the roads safer. I also think adding speed cameras can only help.

Yes - I am a resident on Old London Road and would welcome the changes. The speed people travel up and down is very scary at times, crossing the road to the bus stop is dangerous especially when there is a build up of traffic on the A12 and people want to try and nip through. Lorries travelling at 50mph cause a lot of noise especially when it's wet.

Trying to enter & leave my driveway can be tricky.

I agree the lower speed limits would need to be enforced but a reduction in speed is needed.

Yes - definitely needs changing to slower if you live along old London road you would agree

It's like a race track at times and it's a wonder someone hant been killed along there

No.


2 of 1 likes


Yes


No...the existing 50mph limit is not enforced, we should start there. Also if this was to open up development sites that would make the solution worse than the problem. Well done raising this Peter.


No 


Narrowing will not stop the speeding.


Average speed cameras. 


Lower speed. 

Better crossings. 

Weight restrictions on both lanes. 

Wider pathways for access to the village and school. 

Better signage 

Continue working hard on grass cutting 

Narrowing will cause issues with diverted traffic off the A12

Consider what other villages do that are located on the A1071 (pedestrian crossing at Hintlesham)

Yes

No

No

No

NO. We need enforceable weight restrictions. Lorries should not be using our village as a short cut or a way to avoid a hold up at A12/14 roundabout. To shut off one lane for the benefit of a few cyclists is madness. As already pointed out. Slow Lorries will cause frustration and undertaking using said cyclist lane. Average speed cameras should help and maybe stop the racers. NO, NO, NO.

Yes I would like a cycle lane but worry about what will happen to the traffic if the Orwell Bridge is closed or there is a problem on the A12/A14.

No,

50 is a reasonable speed for that road.

The limit does need to be actively enforced.

I have a feeling that fitting speed cameras, like extra insulation in your house, will 'pay for itself' in a very short time.

No

No - mainly because drivers will not take any notice of a 30 they don't take notice of 50, the only way this will ever get resolved is to install average speed cameras or cameras generally. I believe a cycle lane would be good alongside the footpath where the grass verge is but not close a carriage way as will experience even longer queues on the A12 if the bridge shuts. We live down Elm Lane and my Daughter has to cross the dual carriageway every morning to catch the public bus to High School and sometimes takes her life in her hands trying to run across because the speed of traffic or can't cross at all resulting her in missing the bus when there are problems on the A12 because of the sheer volume of traffic. Whilst some boy racers do race along here it, I've seen lots of other people race along here including motor bikes, vans etc. Speed Cameras is the only answer.

No

I think 'no' to speed limit reduction, but average speed cameras should be installed to help with the speeding issues/accidents/and the idiots racing up and down at night time.

Re the cycle lane - if it means reducing the road to one lane then no.

I personally don't think it's safe to ride along a 50mph road anyway (I wouldn't!).

Otherwise, if they're widening the path and keeping it clear/well kept then I don't have an issue with a 'separate' cycle lane.

No.

We need average speed cameras, that would stop people using the road as a race track, reduce the accidents, and reduce the noise of certain drivers/motorcyclists who like to make their exhausts 'pop' etc. My opinion is that the road is suitable for a 50 limit, as long as it's managed. I can only see that it will cause more issues if the road was single carriageway, with 30/40 signs that will not be managed.

We need the footpath maintained, and widened where possible but not into the current road. I use the road very regularly as a car driver and walker. The vast majority of cyclists I see using the road are on road bikes, who travel at high speeds which are not suitable for our current footpath (not that cyclists should be using the footpath anyway). If the speed of motorists on the road is maintained, that will help the cyclists who share the road with them.

We also need better crossing points for pedestrians and cyclists. Although we need to ensure large vehicles cannot use them, as they need to drive the length of the road to turn around if they need access to businesses/properties on the other side of the road.

I have used this road most of my life, as a walker, cyclist, and car driver. The road was the main A12, with a high volume of traffic, and unfortunately deaths. When the Copdock roundabout was put in, it eased London Road and made it much safer. However, as more houses are built, the population increases, the amount of vehicles on the roads increased, the road has become less safe for all. We need better management of the road, not spending huge amounts of money changing it when, I personally believe the majority of users and residents have always asked for speed cameras.

Speed cameras will pay for themselves in no time at all.

Please note the names have been removed because of Data Protection rules and this is a sample of the comment made online

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(16) Resident - Tyler

Consultation Response Form – Copdock & Washbrook N’hood Plan 2023 - 37

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent, please complete Part’s A & B

Part A: Respondent	
Title / Name:	Tyler
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	██████████
Postcode:	██████████
Tel No:	██████████
E-mail:	██████████

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.	11.2 cell 6	Policy No.	Evidence Gathering
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support	Oppose
Support with modifications	Have Comments
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ... I do not believe Highways will agree to reduce the dual carriageway to single lane having spoken to them at length and this proposal is cost prohibitive. The cheaper and simpler option is to instal Speed cameras. Speeds are in excess of 70 to 100 mph along this road and it is only a matter of time before some one is killed. There should be no planning sites along Old London Road due to the already excessive traffic and speeds.
(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ... Installation of Speed Cameras along Old London Road. It is the only thing to reduce speed.
 for a postal vote with all options to be sent to every householder in Copdock + Washbrook. Not everyone does social media or online and unless a vote is ~~to~~ taken this precludes a whole section age related of the village.
(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held, please explain why this is necessary.

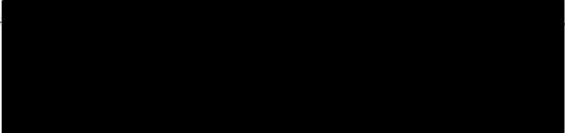
The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ... for the village to have a survey and vote for the village to be generated by post to all residents and for the PC to act upon the vote of the villagers. Not everyone does social media and this is age restrictive as many elderly in the village are left without a voice.
(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

Publication of the Independent Examiners Final Report	<input checked="" type="checkbox"/>
The 'making' (adoption) of the Copdock & Washbrook NP by Babergh District Council	<input checked="" type="checkbox"/>

Signed: 	Dated: 21/6/24
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Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.	1:13	Policy No.	Evidence Gathering
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support	Oppose	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Support with modifications	Have Comments	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ...

I can not agree to the landscaping appraisal because it has not independently or accurately assessed the impact of wildlife in the site next to my property for which if properly assessed a wildlife protection order would need to be put in place. A Bat Survey was carried out to my property and we have brown bats flying around our property and are likely to be nesting in the oak tree in the field. We have harvest mice in the field next door which are becoming endangered

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ... and badger sets. At a minimum a specialist report should be sought and the landscaping report amended to include protection. That the field next to Belldown is removed as one of the 14 proposed planning sites to protect endangered species and preserve the historic buildings surrounding this site. A conservation app area application should be sought as the report inaccurately describes the number of listed buildings and those should be protected at all costs for future generations

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the matter through the written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held, please explain why this is necessary.

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

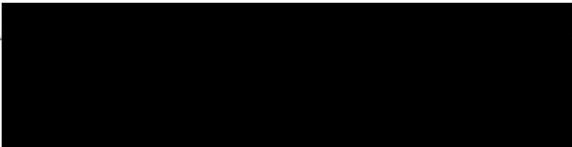
I consider that a hearing should be held because ...

Please be as brief and concise as possible ... I believe this plan does not represent the views of the vast number of the village and does not seek to protect the natural environment of nature of the village for the future. I don't believe there have been any material changes in the village attitude since the last referendum.

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

Publication of the Independent Examiners Final Report	X
The 'making' (adoption) of the Copdock & Washbrook NP by Babergh District Council	X

Signed: 	Dated: 21/6/2024
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(17) Response from Copdock & Washbrook Parish Council

Parish Council's response to comments received at Regulation 16 Consultation stage - July 2024

Body	Parish Council response
<p>1) Suffolk County Council</p>	<p>Suffolk County Council commented at Regulation 14 consultation stage <u>Adaptable and Accessible Homes and Policy C&W3</u></p> <p>Whilst the Parish Council supports the provision of adaptable homes, it is conscious that it is not necessary to repeat the policies of local plans in a neighbourhood plan. Policy LP24 – Design and Residential Amenity of the newly adopted Part 1 Joint Local Plan requires, in part 2l, that housing developments “Provide at least 50% of dwellings which meet the requirements for accessible and adaptable dwellings under Part M4(2) of Building Regulations (or any relevant regulation that supersedes and replaces).</p> <p><u>Local Green Spaces</u></p> <p>The Parish Council notes the comments concerning the evidence to support the Local Green Spaces designation.</p> <p>The spaces were designated in the original Neighbourhood Plan that was examined in September 2021. At the time the Examiner’s Report stated:</p> <p><i>“In my view, the proposed LGSs meet the criteria in the NPPF satisfactorily. Both are demonstrably important to the local community, all are capable of enduring beyond the Plan period, all meet the criteria in paragraph 102 of the NPPF and their designation is consistent with the local planning of sustainable development and investment in sufficient homes, jobs and other essential services given the housing figures for this local area and other policies in the development plan and this Plan.”</i></p> <p>The criteria in the NPPF have not changed since that time and neither have the spaces. As such, the Parish Council believes that the Examiner has sufficient information to judge whether the spaces continue to meet the NPPF LGS criteria now set out in paragraph 106 of the NPPF (December 2023).</p>
<p>2) Babergh District Council</p>	<p>Babergh District Council commented at the Regulation 14 consultation stage.</p> <p><u>Joint Local Plan References</u></p> <p>The comments of the District Council are noted and the Parish Council considers that such incidental changes, including those suggested to paragraphs 6.3, 6.5 and 6.6, can be made to the Plan in producing a Referendum Plan without impacting on the Basic Conditions.</p> <p><u>Paragraph 6.4</u></p> <p>The Parish Council considers that the change suggested can be made in producing a Referendum Plan without impacting on the Basic Conditions.</p>

Policy C&W3 – Housing Mix

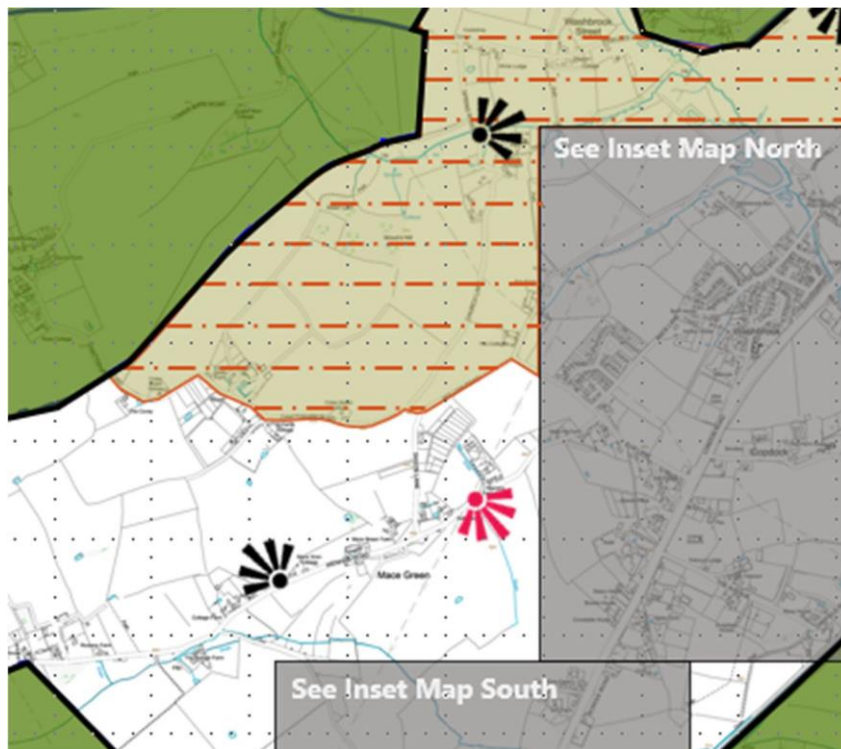
The Parish Council notes the suggestion for an additional paragraph concerning making adjustments to the mix for different tenures where a need can be demonstrated. This suggestion reflects the content of Policy C&W3 i) and the Examiner is invited to consider whether the additional paragraph is considered necessary.

Chapter 8

The Parish Council considers that the changed suggested can be made in producing a Referendum Plan without impacting on the Basic Conditions.

Policy C&W11 – Important Views

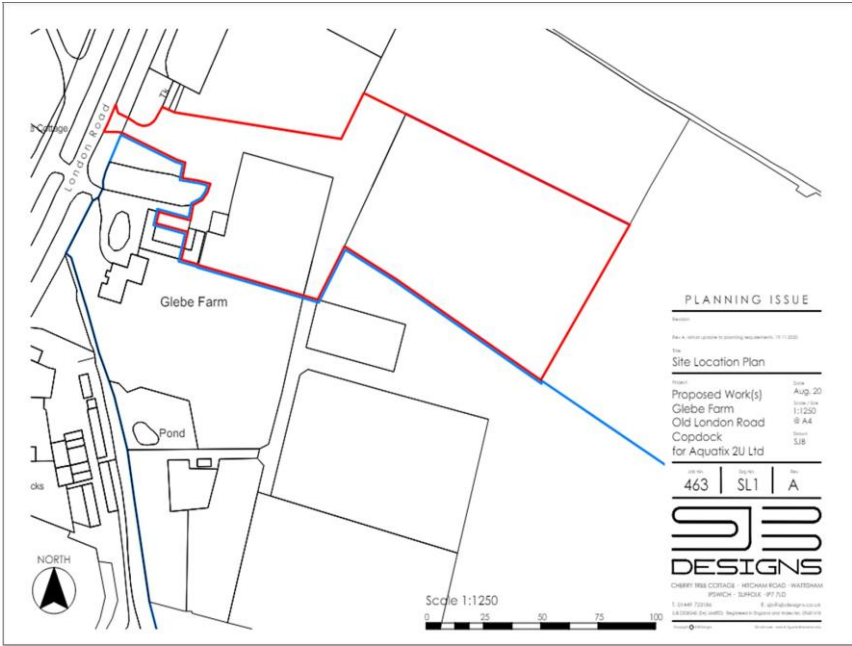
The Parish Council acknowledges that an error has been made on the Policies Map and that the viewpoint illustrated in red below should have been shown. The Examiner is invited to consider whether it is appropriate to rectify this error in the Referendum version of the Plan.



3) Sproughton Parish Council	Sproughton Parish Council were consulted but did not comment at the Regulation 14 consultation stage. Nothing further to add
4) Historic England	Historic England commented at the Regulation 14 consultation stage. Nothing further to add
5) Natural England	Natural England commented at the Regulation 14 consultation stage. Nothing further to add

6) Anglian Water	Anglian Water commented at the Regulation 14 consultation stage. Nothing further to add
7) Environment Agency	The Environment Agency were consulted but did not comment at the Regulation 14 consultation stage. The Parish Council notes the comments but does not consider it necessary for the Examiner to make changes to the Plan as a result of them.
8) National Landscape Team	The National Landscape Team were consulted but did not comment at the Regulation 14 consultation stage. Nothing further to add
9) Suffolk Wildlife Trust	Suffolk Wildlife Trust were consulted but did not comment at the Regulation 14 consultation stage. <u>Biodiversity (County Wildlife Sites)</u> The Parish Council is surprised that information about County Wildlife Sites is not publicly available and that a charge is made by the Suffolk Biological Information Service for this data. That said, it is noted that approximately 0.5 hectares of the Sproughton Park County Wildlife Site is within the parish and paragraph 8.13 of the Plan could be amended to include reference to it. <u>Policy C&W9 - Biodiversity</u> The Parish Council notes the aspiration to deliver net gain beyond the minimum 10%. Such a requirement would need to be based on parish specific evidence that this is deliverable and viable for developments. Such evidence is not available. <u>Policy C&W10 – Recreational Disturbance and Mitigation</u> Nothing further to add
10) National Highways	National Highways were consulted but did not comment at the Regulation 14 consultation stage. <u>Policies (C&W 2 and 3) Housing</u> Nothing further to add <u>Policies (C&W 17 and 18) Highways and Movement</u> The offer to work closely with the Parish Council on the Old London Road project are welcomed
11) Sport England	Sport England were consulted but did not comment at the Regulation 14 consultation stage. The comments are noted and nothing further to add
12) Artisan Planning & Property Services	Artisan Planning & Property Services did not comment at the Regulation 14 consultation stage. 1) The Policies Map indicates those sites where an employment use is in place, rather than where a planning consent has been granted but had, at the time of originally preparing the Plan, yet to be implemented.

It is noted that planning application DC/20/05176 - Erection of new returns (quarantine) warehousing building, office extension(s) and change of use and conversion of stables to form office accommodation at Glebe Farm, Old London Road was granted planning consent in January 2021 and has now been implemented. The planning application covered the area as illustrated by the red line in the site location plan reproduced below



However, the built form only covers the area illustrated in red on the map below and the Parish Council considers that the blue annotation for employment use should only extend to this area should the Examiner be minded to recommend an amendment to the Map.

2) Appendix 1

The appendix illustrates a situation at a point in time and will become more and more redundant with the passage of time. As such, the Examiner is asked to consider whether the Appendix should remain in the Referendum version of the Plan and, if so, whether it should be updated to reflect the situation as at a more recent point in time?

13) Phase 2 Planning for Suffolk County Council

The County Council submitted comments in relation to the allocation of a site for housing at the Regulation 14 Consultation stage.
 The Parish Council has nothing further to add to its previous comments.

14) Mr Ward

Mr Ward did not comment at regulation 14 consultation stage.
Para 9.7
 The Neighbourhood Plan does not propose large scale housing development.

	<p><u>Para 11.3</u></p> <p>The Local Plan does not currently allocate sites for housing development. This will be addressed in the preparation of the Part 2 Local Plan document which is separate to the neighbourhood Plan.</p> <p><u>Para 11.4</u></p> <p>The Neighbourhood Plan does not propose closing one carriageway of the Old London Road.</p> <p><u>Para 11.6</u></p> <p>The Neighbourhood Plan contains aspirations that do not form part of the planning policies in the Plan and do not need to be assessed to determine whether they meet the Basic Conditions. The proposal to reduce Old London Road to a single carriageway is one such aspiration that would require significant investment by the County Council, as the highways authority, as noted in paragraph 11.5 of the Plan.</p>
15) Mr Herd	<p>Mr Herd did not comment at regulation 14 consultation stage.</p> <p>The comments relate primarily to highway matters (such as speed limits) which would not require planning consent and therefore do not form planning policies in the Neighbourhood Plan that have to meet the Basic Conditions. The Parish Council has put forward a number of highways related aspirations but ultimately the County Council, as the highways authority, would need to fund, design and implement such projects potentially with contributions from the Community Infrastructure Levy.</p> <p>Policy C&W18 seeks contributions towards highways improvements (without specifying what the improvements are) and encourages schemes that encourage greater use of Old London Road by sustainable travel modes. Such an approach is believed to be inline with current County Council investment priorities.</p> <p>Reference is also made to the Landscape Appraisal and "why the Parish Council has conducted an assessment of eight sites within the landscape appraisal". The attention of the Examiner is drawn to section 3.4 of the Landscape Appraisal which refers to a "<i>Landscape Sensitivity Assessment was undertaken by LUC to inform the allocation and assessment of sites as proposed in the emerging Babergh and Mid Suffolk Joint Local Plan.</i>" These sites were put to Babergh District Council as part of their call for sites when preparing the Draft Local Plan. The Neighbourhood Plan Landscape Appraisal does not assess any sites as to their suitability for development and the Neighbourhood Plan does not allocate any sites for development.</p> <p>In a related matter, the Examiner will note that the separate Copdock and Washbrook Design Guidelines submitted in support of the Neighbourhood Plan. The contents page makes it quite clear that Chapter 4 no longer applies to the 2023 Neighbourhood Plan as the site it refers</p>

to is not allocated in the new Neighbourhood Plan. It also states that “all references to land allocated between Back Lane and London Road should be ignored as the allocation no longer has any status in the emerging Babergh and Mid Suffolk Joint Local Plan (as at March 2023)”. It is apparent that there remains some confusion as to the status of the site in the Guidelines and the Examiner might like to consider whether it is necessary for the Design Guidelines to be amended further to clarify the situation.

Reference is also made by Mr Herd to there being “very little change” from the Plan that was rejected at referendum in March 2022. The Plan has changed significantly and the policy changes were set out in the leaflet that was distributed to properties in the parish at the time of the pre-submission consultation. An extract from that leaflet is included below.

What’s changed from the previous Plan?

The fundamental element of neighbourhood plans are their planning policies, against which planning applications for new development will be assessed. The previous draft Plan contained 19 policies which we have reviewed. The table illustrates what’s changed since the last Plan.

Previous Plan Policy	New Plan
Policy C&W 1 - Spatial strategy	Slight amendments to make policy clearer
Policy C&W 2 - Housing development	Deleted
Policy C&W 3 - Land south-east of Back Lane	Deleted
Policy C&W 4 - Affordable housing on rural exception sites	No change to Policy in previous Plan
Policy C&W 5 - Housing mix	Amended to provide specific proportions of house sizes in any future housing developments
Policy C&W 6 - Employment sites	No change to Policy in previous Plan
Policy C&W 7 - New businesses and employment	No change to Policy in previous Plan
Policy C&W 8 - Farm Diversification	No change to Policy in previous Plan
Policy C&W 9 - Area of Local Landscape Sensitivity	Amended to include area between Back Lane and Old London Road
Policy C&W 10 - Local Green Spaces	No change to Policy in previous Plan
Policy C&W 11 - Biodiversity	Amended to reflect more stringent national requirements for the protection and improvement of natural habitats
Policy C&W 12 - Recreational Disturbance Avoidance and Mitigation	No change to Policy in previous Plan
Policy C&W 13 - Protection of Important Views and Landscape Character	No change to Policy in previous Plan
Policy C&W 14 - Heritage Assets	No change to Policy in previous Plan
Policy C&W 15 - Design Considerations	No change to Policy in previous Plan
Policy C&W 16 - Sustainable Construction Practices	No change to Policy in previous Plan
Policy C&W 17 - Protecting existing services and facilities	No change to Policy in previous Plan
Policy C&W 18 - Open Space, Sport and Recreation Facilities	No change to Policy in previous Plan
Policy C&W 19 - Public Rights of Way	No change to Policy in previous Plan

The main change is the deletion of the site that was allocated for 226 new homes between Back Lane and Old London Road. The new draft Babergh Local Plan had allocated this site but Government Inspectors examining that Plan have advised the District Council to do further work on their proposed housing allocations and so these proposals now have no status at this time.

The new Neighbourhood Plan continues to include the “community aspirations” previously identified. These focused on transport and highway initiatives along London Road to make it safer for all users.

<p>16) Tyler</p>	<p>This person did not comment at regulation 14 consultation stage.</p> <p><u>Paras 11.2 to 11.6</u></p> <p>The comments relate primarily to highway matters (such as speed limits) which would not require planning consent and therefore do not form planning policies in the Neighbourhood Plan that have to meet the Basic Conditions. The Parish Council has put forward a number of highways related aspirations but ultimately the County Council, as the highways authority, would need to fund, design and implement such projects potentially with contributions from the Community Infrastructure Levy.</p> <p><u>Para 1.13</u></p> <p>The Landscape Appraisal was not an assessment of the presence of wildlife or habitats. This would be the subject of a separate specialist survey, should a site come forward for development.</p> <p>Section 3.4 of the Landscape Appraisal which refers to a "<i>Landscape Sensitivity Assessment was undertaken by LUC to inform the allocation and assessment of sites as proposed in the emerging Babergh and Mid Suffolk Joint Local Plan.</i>" These sites were put to Babergh District Council as part of their call for sites when preparing the Draft Local Plan. The Neighbourhood Plan Landscape Appraisal does not assess any sites as to their suitability for development and it is reiterated that the Neighbourhood Plan does not allocate any sites for development.</p>
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