

Edwardstone Neighbourhood Plan 2021 - 2037

Submission Consultation Responses

In March 2024, Edwardstone Parish Council (the 'qualifying body') submitted a 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 Monday 29 April until Friday 14 June 2024

Thirteen representations were received. They are listed below and copies are attached. Also included for information is a late representation from this Council.

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	Historic England
4	Natural England
5	Suffolk Wildlife Trust
6	Environment Agency
7	Anglian Water
8	Water Management Alliance
9	Avison Young (obo National Grid)
10	Avison Young (obo National Gas)
11	National Highways
12	Defence Infrastructure Organisation (obo the MOD)
13	Resident - Martin
14	Babergh District Council - Late Representation from re Policy EDW2
15	Response from Edwardstone Parish Council

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(1) SUFFOLK COUNTY COUNCIL

Date: 14 June 2024
Enquiries to: Georgia Teague
Tel: [REDACTED]
Email: neighbourhoodplanning@suffolk.gov.uk



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

Sent via email to: Communityplanning@baberghmidsuffolk.gov.uk

Dear Mr Bryant,

Submission Consultation version of the Edwardstone Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Edwardstone 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.

SCC welcome the changes that have been made as part of our Reg14 submission, and have no further comments at this time.

We wish to remain informed of this plan as it progresses.

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: Edwardstone NP R16 Response

Dated: 14 June 2024

From: Planning Policy Team, Babergh DC

To: Ann Skippers (Independent Examiner)

Sent by e-mail

Dear Ann,

Reg 16 submission draft Edwardstone Neighbourhood Plan 2021 - 2037

Representation from Babergh District Council

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

This Council welcomes the changes made to this submission draft plan in response to our Regulation 14 comments. Some drafting errors persist, but we suggest that these can all be dealt with through the minor modifications process. Our only substantive comment relates to Policy EDW9. All are set out below and, these aside, we have no further comments to make on this Plan at this stage.

Chapter 3

- Para 3.5: As it is no longer relevant, delete the sentence that reads: '*The Plan period for the Core Strategy runs to 2031*'.
- Figure 14: The district policy hexagon needs updating (i.e. it should refer to the 'Joint Local Plan')
- Given the content of the respective paragraphs, and to ensure that the content of this Plan remains relevant, we recommend that the 'Adopted Local Planning Policy' and 'Emerging Local Planning Policy' sub-headings immediately preceding paragraphs 3.6 and 3.7 should be deleted.
- In paragraph 3.6, for context ...
 - amend the first sentence to read: " ... *in the settlement hierarchy of the ~~adopted~~ 2014 Core Strategy under Policy CS2, ~~which looks to the period 2031~~.*"
 - the second sentence should now read: "*The Core Strategy approach to development ~~in Hinterland villages is~~ ~~was~~ that most new development (including employment, housing, and retail, etc.) in Babergh ~~will~~ ~~would~~ be directed sequentially to the towns / urban areas, and then to the Core Villages followed by the Hinterland Villages.*'
 - the third sentence should now read: "*In call cases the scale and location of development ~~will~~ ~~would~~ depend upon the local housing need, [etc] ...*"
- We recommend that Figure 15 reverts back to the image shown in the R14 Pre-submission plan, i.e., the 2006 Babergh Local Plan settlement boundary map, and that the text be amended to read: '*Edwardstone Inset Map from 2006 Babergh Local Plan (Orange line denotes settlement boundary).*' [Until JLP Part 2 comes forward, these 2006 boundaries are the default position].
- Re Figure 16, we suggest that the text reads '*(Purple line denotes proposed settlement boundary, green denotes listed buildings and ~~red~~ ~~light orange~~ shading denotes proposed open spaces)*'



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- Re Figure 17, we suggest this also include a descriptive key '(Purple line denotes proposed settlement boundary and green denotes listed buildings)'

Chapter 7

- In paragraph 7.5, a modification is still required to amend the publication date of our Housing Land Supply Position Statement so that it reads 'December 2022'

[See: <https://www.babergh.gov.uk/documents/d/asset-library-54706/babergh-2022-5hls>]

- **Policy EDW2** - As a consequence of the amendments made to this policy, footnote 8 [the word 'Permanently'] has been pushed onto page 45 of Plan, which happens to be the next Chapter. With some re-formatting ... we suggest that the policy text box start on page 43 and continue onto page 44 as necessary ... it should be possible to bring this footnote back to a more appropriate location.

Chapter 10

- **Policy EDW9 (Community Facilities):** The desire expressed through paragraphs 10.1 to 10.3 to adequately protect community facilities within the parish is understood. Within this policy, it is necessary for us to revisit our Reg 14 comment re the marketing period referred to in criterion i).

To be consistent with adopted JLP Policy LP28, this should be amended to refer to 'a *sustained marketing period of normally six months*'. Such a modification would be consistent with the approach taken in another recently examined neighbourhood plan¹ where it was observed that no evidence had been provided to justify why a twelve month marketing period was more appropriate in that case. Applying the evidence rule to all emerging neighbourhood plan on a consistent basis is both practical and fair.

We suggest the following text which also removes an element of repetition:

i) a sustained marketing period, normally of six months, in appropriate publications (online, in print, and through agencies) for the permitted and similar uses, and

- **Para 10.7.** Although noted for action in the Consultation Statement, the last two sentences still need correcting so that they refer to Figure 29 [the map] and to Appendix C, respectively.

We trust that these observations are helpful.

Yours sincerely,

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

¹ See Lavenham NP Exam Report [<https://www.babergh.gov.uk/documents/d/babergh/lavenham-np2-exam-report-apr24>]
– in particular discussion re policies LAV 28 and LAV 29 / paragraphs 233 to 234 and 241.

(3) HISTORIC ENGLAND



Historic England

Mr Paul Bryant
Babergh & Mid Suffolk District Councils
Endeavor House
8 Russell Road
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Suffolk
IP7 6SJ

Direct Dial: [REDACTED]

Our ref: PL00746342

3 May 2024

Dear Mr Bryant

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

We do not wish to make any additional comments at this stage, and refer you also to any comments made at Regulation 14 stage, as well for general advice to our detailed guidance on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

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

Yours sincerely,

Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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(4) NATURAL ENGLAND

Date: 12 June 2024
Our ref: 474704
Your ref: Edwardstone Neighbourhood Plan

Mr Paul Bryant
Babergh & Mid Suffolk District Councils

BY EMAIL ONLY

communityplanning@baberghmidsuffolk.gov.uk



Hornbeam House
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CW1 6GJ
T 0300 060 3900

Dear Mr Bryant

Edwardstone Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 26 April 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.



Edwardstone NP Consultation
c/o Planning Policy Team
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23rd May 2024

RE: Consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 | The Edwardstone Neighbourhood Plan 2021 - 2037

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

Suffolk Wildlife Trust are pleased to see that the Edwardstone Neighbourhood Plan recognises the importance of biodiversity and seeks to ensure its protection and enhancement within Policy EDW6. We believe that there is evidence and rationale supporting that the plan could go even further, to deliver more for wildlife within Edwardstone, and again urge this to be considered.

Policy EDW6: Protecting & Enhancing Biodiversity

To reiterate our previous comments, this policy includes background information identifying protected sites with the Parish and puts forward the importance of their protection; Suffolk Wildlife Trust are pleased to see this has been included alongside consideration for wildlife corridors and greenspace. We raise no concern with Policy EDW6 but put forward the idea that it could be further improved in its delivery for nature and nature recovery.

Suffolk Wildlife Trust acknowledge the updates to this policy from the previous consultation, which bring the policy up to date with the new Biodiversity Net Gain requirements. However, we again suggest that the plan could 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*¹. It is important to highlight that 10% is, "In simple terms, is the lowest level of net gain that [DEFRA] could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives."²

Maidstone Borough Council recently included a requirement for a minimum 20% net gain in their emerging local plan³. The plan went to review after changes to Planning Practice Guidance (PPG)⁴ where changes to the wording may suggest that delivering above 10% may be undesirable and requires justification. However, the

¹ 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>

² DEFRA Impact Assessment: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf

³ Maidstone Borough council, 2021, Local Plan review, Draft Plan for Submission (Reg.19), <https://drive.google.com/file/d/13MfNeKxSGxYlFCCkZcP6-ggua2EFInbt/view>

⁴ <https://www.gov.uk/guidance/biodiversity-net-gain>

inspector's report of the Maidstone Local Plan⁵ noted that there was suitable evidence and justification provided. Suffolk Wildlife Trust therefore believe that, with suitable justification, the Edwardstone 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.

Yours sincerely,

Alex Jessop

Planning & Advocacy Officer

planning@suffolkwildlifetrust.org

⁵Spencer, 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 EDW6

The inspector's report of the Maidstone Local Plan⁵ 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 Trust⁶ 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 Plan⁷. 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 Report⁸ 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 Plan⁹ 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

⁶ <https://www.kentwildlifetrust.org.uk/blog/what-is-biodiversity-net-gain>

⁷ <https://www.kent.gov.uk/environment-waste-and-planning/climate-change/climate-emergency-statement>

⁸ https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf

⁹ <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 England¹⁰:
 - 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 Report¹¹. 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 2020¹², which were put forward as part of a “2020 Vision”¹³.
- West Suffolk Council have declared a climate and environment emergency¹⁴ 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 emergency¹⁵.
- Suffolk County Council have declared a climate emergency¹⁶ and will continue to change approaches to progress to net zero, and work to encourage others’ behavior changes. 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*¹⁶.
- Babergh Mid-Suffolk District Council declared a climate and biodiversity emergency in 2019¹⁷ and in September 2019, councilors approved commitments to enhance and protect biodiversity across our district.
 - Furthermore, and as noted above, the new draft SPD Biodiversity and Trees includes an ambition to deliver 20% net gain¹.

¹⁰ https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering_30by30_on_land_in_England.pdf

¹¹ https://wcl.org.uk/assets/uploads/img/files/WCL_2023_Progress_Report_on_30x30_in_England_1.pdf

¹² <https://publications.parliament.uk/pa/cm5802/cmselect/cmenvaud/136/136-summary.html>

¹³ <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

¹⁴ <https://www.westsuffolk.gov.uk/environment/climate-change/index.cfm>

¹⁵ <https://www.bbc.co.uk/news/uk-england-suffolk-68370018>

¹⁶ <https://www.suffolk.gov.uk/council-and-democracy/our-aims-and-transformation-programmes/our-ambitions-for-suffolk/protecting-and-enhancing-our-environment>

¹⁷ <https://www.babergh.gov.uk/documents/d/mid-suffolk/climate-change-and-biodiversity-annual-report-mid-suffolk>

(6) ENVIRONMENT AGENCY



Paul Bryant
Suffolk County Council
babergh District Council
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2024/129463/01-L01
Your ref: Reg 16 submission
Date: 13 June 2024

Dear Paul

CONSULTATION UNDER REG' 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 THE EDWARDSTONE NEIGHBOURHOOD PLAN 2021 - 2037

EDWARDSTONE

Thank you for consulting us on the reg 16 submission plan for the Edwardstone Neighbourhood Plan.

We regret that at present, we are unable to review this consultation. We have had to prioritise our limited resource and must focus on influencing plans where the environmental risks and opportunities are highest.

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. In particular, we note that the boundary does extend into areas of Flood Zones 2 and 3 of the designated main River Box.

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 161 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 licencing strategies (CAMS process) - GOV.UK (www.gov.uk).

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](#)

Source Protection Zones

Your plan includes areas which are located on Source Protection Zone 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.

We trust this advice is useful.

Yours sincerely

Mr Andrew Thornton
Planning Advisor

Direct dial: [REDACTED]

Mobile: [REDACTED]

Direct e-mail: [REDACTED]

Team e-mail: Planning.EastAnglia@environment-agency.gov.uk

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(7) ANGLIA WATER

E from: Carry Murphy | Spatial & Strategic Planning Manager
Rec'd: 3 June 2024
Subject: Consultation on R16 Edwardstone NP (Babergh DC)

Dear Mr Bryant,

Thank you for notifying Anglian Water on the draft Edwardstone Neighbourhood Plan Reg.16 consultation.

To confirm, we have no additional comments to make to our previous comments made at Reg.14 stage.

Yours sincerely,

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

[Ends]

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(8) WATER MANAGEMENT ALLIANCE

E from: Planning Department <planning@wlma.org.uk>

Rec'd: 26 April 2024

Subject: RE: Consultation on R16 Edwardstone NP (Babergh DC)

Good morning,

Thank you for your email.

The parish of Edwardstone lies outside of the drainage catchment area of East Suffolk Water Management Board. Therefore, the Board has no comments to make.

Kind regards,

Phi



Phillipa Nanson, Ba(Hons) (she/her/hers)
Sustainable Development Officer
Water Management Alliance
e: phillipa.nanson@wlma.org.uk

Registered office: Pierpoint House, 28 Horsley's Fields, Kings Lynn, Norfolk, [PE30 5DD](postcodes:PE305DD)


t: 01553 819600 | e: info@wlma.org.uk | www.wlma.org.uk

What3Words: [caring.employ.visit](https://www.what3words.com/caring.employ.visit)

WMA members: [Broads Drainage Board](#), [East Suffolk Water Management Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [South Holland Drainage Board](#), [Waveney, Lower Yare and Lothingland Drainage Board](#)

In Association with: [Pevensey and Cuckmere Water Level Management Board](#)

Follow us:  [Twitter](#)  [Facebook](#)  [Instagram](#)  [LinkedIn](#)  [YouTube](#)

 Your feedback is valuable to us, we continually review and work to improve our services. If you have any suggestions, recommendations, questions, compliments or complaints, please complete one of our online forms: [Feedback Form](#) | [Complaint Form](#)

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With our commitment to ISO 14001, please consider the environment before printing this e-mail.

Defenders of the Lowland Environment

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**(9) AVISON YOUNG
(obo National Grid)**

Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

avisonyoung.co.uk

Our Ref: MV/ 15B901605

06 June 2024

Babergh District Council
communityplanning@baberghmidsuffolk.gov.uk
via email only



Dear Sir / Madam
**Edwardstone Neighbourhood Plan - Regulation 16 Consultation
April – June 2024
Representations on behalf of National Grid Electricity Transmission**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to NGET infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Further Advice

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Tiffany Bate, Development Liaison Officer

box.landandacquisitions@nationalgrid.com

National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: www.nationalgrid.com/network-and-assets/working-near-our-assets

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

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(10) AVISON YOUNG (obo National Gas)

Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

avisonyoung.co.uk

Our Ref: MV/ 15B901605

06 June 2024



Babergh District Council
communityplanning@baberghmidsuffolk.gov.uk
via email only

Dear Sir / Madam
**Edwardstone Neighbourhood Plan - Regulation 16 Consultation
April – June 2024
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:



Matt Verlander, Director

nationalgas.uk@avisonyoung.com

Avison Young
Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

Kam Liddar, Asset Protection Lead

kam.liddar@nationalgas.com

National Gas Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

Matt Verlander MRTPI
Director
0191 269 0094
matt.verlander@avisonyoung.com
For and on behalf of Avison Young

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

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Our ref: NH/24/06117 Edwardstone NP (REG 16)

Your ref: Edwardstone NP Reg 16 Consultation

'Edwardstone NP Consultation',
c/o Planning Policy Team
Babergh District Councils
Endeavour House, 8 Russell Road,
Ipswich, Suffolk, IP1 2BX.

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

23 May 2024

Via email to: communityplanning@baberghmidsuffolk.gov.uk

Dear Sir/Madam,

**CONSULTATION UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING
(GENERAL) REGULATIONS 2012 (AS AMENDED)
SUBMISSION DRAFT EDWARDSTONE NEIGHBOURHOOD PLAN 2021 - 2037**

Thank you for your correspondence, dated on 26 April 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 Edwardstone Neighbourhood Plan, our principal interest will include safeguarding the operation of the A12 and A14 SRN routes within Suffolk.

This proposed Neighbourhood Plan area is remote from the nearest Strategic Road Network (SRN). Due to the proposed development scale, nature, and location, there would not be any predicted adverse impact on the Strategic Road Network (SRN).

National Highways do not have any comment on this above-mentioned neighbourhood Plan consultation.

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

Yours faithfully,

S. H.

Dr 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.

(12) DEFENCE INFRASTRUCTURE ORGANISATION



Defence
Infrastructure
Organisation

Christopher Waldron
Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Your reference: Edwardstone
Neighbourhood Plan Reg16 consultation

Mobile: [REDACTED]

Our reference: 10060272

E-mail: DIO-Safeguarding-Statutory@mod.gov.uk

Paul Bryant
Neighbourhood Planning Officer
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

13th June 2024

Dear Paul

It is understood that Babergh and Mid Suffolk District Councils are undertaking a consultation regarding their Edwardstone Neighbourhood Plan Regulation 16. This document will guide the future development of the parish.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Department for Levelling Up.

Copies of these relevant plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

The area covered by the Edwardstone Neighbourhood Plan will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites. Wattisham Station is located to the East of the Edwardstone Neighbourhood Plan authority area and benefits from safeguarding zones drawn to preserve the airspace above and surrounding the aerodrome to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. New development may have detrimental impacts depending on site location relative to safeguarded sites and assets. Additionally, Wattisham Station is washed over by a statutory birdstrike safeguarding zone, designed for birdstrike risk to be identified and mitigated.

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of each of the safeguarding zone types is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

- The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Zones are drawn that trigger consultation on development of various heights to ensure that their effect on the protected airspace above and surrounding an aerodrome is assessed and, if necessary, mitigated. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.
- Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes. Aircraft within these zones are most likely to be approaching or departing aerodromes and therefore being at critical stages of flight. Within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, as well as the creation of new waterbodies such as ponds, wetlands and/or attenuation basins. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation and therefore may be subject to design requirements or for management plans to be applied.

In addition to the safeguarding zones identified, the MOD may also have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:

- Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.
- Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more; and,
- Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft
- Development, regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or property.

The MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, and Biodiversity Net Gain; Babergh & Mid Suffolk District Councils bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

C Waldron

Chris Waldron
DIO Assistant Safeguarding Manager

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(13) RESIDENT - MARTIN

Consultation Response Form - Edwardstone Neighbourhood Plan 2021 - 2037

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

Edwardstone Parish Council have prepared and submitted a draft Neighbourhood Plan to Babergh District Council which sets out a vision for the parish and contains policies which it intends will be used to help determine planning applications within the designated area.

The submitted Plan etc. can be viewed online at: www.babergh.gov.uk/EdwardstoneNP

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 and Mrs Martin
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.		Policy No.	
---------------	--	------------	--

Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	Yes
Support with modifications		Have Comments	Yes

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

We are disappointed to see that there is no area for future development permitted within the village boundary. Future development should be a key factor for Edwardstone and the suggested plan seems to prohibit this. Please could you a) explain why this is; and b) further clarify how this plan mirrors the macro planning scheme of the country?

In addition, we would like to see the entirety of our property included within the village boundary, we use this as a garden and see this as part of our overall residence. As such we believe it to be a natural extension of the village and should be included in the plan.

To the extent that this requested change is rejected, please set out what rights of appeal and/or further options for recourse we have available to us

What improvements or modifications would you suggest?

Review the village boundary.

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 ...

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

Publication of the Independent Examiners Final Report	
The 'making' (adoption) of the Edwardstone NP by Babergh District Council	

Signed:

Dated:

(14) BABERGH DC – late representation re Policy EDW2

E from: Strategic Housing Team | Babergh District Council

Rec'd: 14 June 2024 (17:40hrs)

Subject: Edwardstone Neighbourhood Plan

The following internal comments on Policy EDW2 (Housing Mix and Affordable Housing) were issued after the 4:00pm consultation deadline on Friday 14 June and it is therefore appropriate that they should be treated here as a 'late representation'.

1. Re the first paragraph under the Affordable Housing sub-heading which requires such schemes to be 'immediately adjacent to the settlement boundary' ... a reminder that the JLP (Policy LP07) requires rural exception sites to be 'well-connected to the existing settlement', i.e., it does not require the site to be adjacent to a housing settlement boundary, but does make it incumbent on the applicant to find a site which enables safe and sustainable access to existing settlements.

' ... adjacent to or well-connected to the settlement boundaries ... ' would therefore be more appropriate in this case.

2. Re criterion d), for clarity suggest this be rephrased to read as follows:

'The housing is offered in the first instance to people with a demonstrated local connection to Edwardstone as set out in the Gateway to Homechoice (Choice Based Letting Scheme) Allocations Policy 2022 (or successor document).

NB: an online version of the July 2022 Allocations Policy document can be found at:

<https://www.gatewaytohomechoice.org.uk/content/Information/AllocationsPolicyJuly2022>

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(#15) Edwardstone Neighbourhood Plan – REG16 Consultation

Comments by Edwardstone Neighbourhood Plan Steering Group (ENPSG) on REG16 representations – 24th June 2024

Serial	Respondent	Edwardstone NP Steering Group comment
1	Suffolk County Council	Noted. No comment.
2	Babergh District Council	No objection to the minor modifications / updates / drafting errors a suggested Policy EDW9 – no objection to the proposed rewording.
3.	Historic England	Noted. No comment
4.	Natural England	Noted. No comment
5.	Suffolk Wildlife Trust	Support noted. No objection to the inclusion of wording to reflect an ambition for 20% BNG
6.	Environment Agency	Noted. No comment.
7.	Anglian Water	Noted. No comment.
8.	Water Management Alliance	Noted. No comment.
9.	Avison Young obo National Grid	Noted. No comment.
10.	Avison Young obo National Gas	Noted. No comment.
11.	National Highways	Noted. No comment.
12.	Defence Infrastructure Organisation obo MOD	Noted. No comment.
13.	Resident - Martin	Mr and Mrs Martin did not submit representations at R14 stage. Whilst it is noted part of their garden lies outside of the settlement boundary, there is also a larger meadow in their ownership. The position of the settlement boundary does not mean their garden is not part of their residence nor does it preclude the use of their garden for that purpose. This is unaffected by the location of the settlement boundary.

		<p>The settlement boundary is a planning tool which delineates in broad terms where new development may be acceptable. By amending the settlement boundary to include all additional land within their ownership it should be understood that this would effectively be identifying the land as in principle, suitable for new development. The Neighbourhood Plan recognises that Edwardstone has very limited services and therefore development above small scale is likely to be unsustainable. The response to public consultation exercises has indicated that there is a limited appetite from the community for new development in the parish and that where new development is to take place it should be commensurate with the scale and form of the settlement and also should enhance its character. In the case of Mill Green this character is strongly linear, with one plot deep arrangements along the road which enable views through to the countryside. The settlement boundary has been drawn to protect this linear character and has deliberately excluded or transected rear gardens to achieve this.</p>
14.	Babergh DC – Late Rep – Policy EDW2	No objection to proposed wording amendments.