# ELMSETT NEIGHBOURHOOD PLAN FOCUSED REVIEW

# Consultation Statement March 2025



Prepared for Elmsett Parish Council by Places4People Planning Consultancy March 2025



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#### 1. Introduction

- 1.1 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Elmsett Neighbourhood Plan Focused Review.
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
  - contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - explain how they were consulted;
  - summarise the main issues and concerns raised by the persons consulted;
     and
  - describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.

## 2. Background to the preparation of the Neighbourhood Plan Review

- 2.1 In December 2019, following a successful Parish Referendum, the Elmsett Neighbourhood Plan was adopted by Babergh District Council. It was the culmination of two years' work by a team of volunteers working on behalf of the Parish Council. During this time the team had prepared background documents, conducted surveys and written and consulted on the form and content of the Plan.
- 2.2 Following the adoption of the Babergh and Mid Suffolk Joint Local Plan (Part 1), the Parish Council identified that there was a need to update one of the key policies of the Plan Policy EMST1 'Spatial Strategy' to ensure that it is in conformity with the strategic policies of those in the Local Plan.
- 2.3 At the same time, an opportunity was taken to update the factual content of the Plan to reflect the changing circumstances in the parish, the publication of the 2021 Census and the national and local planning policy context.

#### 3. Regulation 14 Pre-Submission Consultation

- Given the scale of change to Policy EMST1, a full "pre-submission" consultation in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. At the meeting of the Parish Council on 5 March 2024 the wording of a draft revised Policy EMST1, together with amended wording of Plan chapter 4 'Planning Policy Context' and chapter 7 'Planning Strategy' were approved for the purposes of consultation.
- 3.2 Pre-submission consultation on these matters commenced on 23 March 2024 and lasted until 13 May, a period of seven weeks. An 8 page leaflet setting out the proposed changes was circulated to every household and business in the parish. The leaflet is included as Appendix 1 of this Statement.

- The consultation was also launched with a well-attended drop-in event held at the Village Hall on 23 March which was advertised on the leaflet. The display boards for the drop-in event are included as Appendix 2 of this Statement.
- 3.4 At the start of the consultation, all the statutory Regulation 14 consultees, as advised by Babergh District Council, were consulted. The full list of bodies consulted is shown in Appendix 3 and the email content used to notify them is included at Appendix 4.

#### 4. Pre-Submission Consultation Responses

4.1 A total of 48 people or organisations responded to the Pre-Submission Consultation as identified below.

J Bedingfield J Furlong T & L Glennon P Bedinafield J Bird J Green N Bird B Hall S Bishop M Harris L Boniface M Holland J Bottley R Hughes B & M Bowell J Johnson M Brett A Morton J Carruthers A Newman **B** Chambers Mr & Mrs Pegington **I** Chambers D Potter B Clifford F Potter G Clover D Pratt

J Dawkins

D Downes

R Fox

S Simmonds K Smith J Sones B Thorpe F Watt F Williams R & D Wilson Historic England Natural England National Highways Anglian Water

Suffolk County Council Babergh District Council Plus one anonymous

response.

4.2 Appendix 5 of this Statement provides a summary of responses to the consultation questions while the schedule of comments and the responses of the Parish Council are set out in Appendix 6. As a result, the Submission version of the Neighbourhood Plan has been appropriately amended as identified in the "changes made to Plan" columns of the Appendix.

M Quinn

Moya Quinn

A Simmonds

4.3 The opportunity was taken to update the general content of the Plan. These changes do not make policy changes, other than deleting Policy EMST3 – Land at Hadleigh Road, which has been implemented. A separate document accompanies the Submission Focused Review Plan entitled 'Schedule of Changes to the 'made' Neighbourhood Plan to be incorporated into the Neighbourhood Plan Focused Review'

Appendix 1 – Consultation Leaflet



The Parish Council has decided to carry out a Focused Review of the 2019 Neighbourhood Plan to bring it in line with the new policies for the location of development across Babergh and with those in other neighbourhood plans.

In a nutshell, we are amending two of the ten chapters of the 2019 Neighbourhood Plan to bring it up-to-date and bring the policy that determines where new development can take place in line with national and district policies.

#### **Drop-in Information Event**

We're holding a drop-in information event at the Village Hall on Saturday 23 March between 10.00am and 3.00pm. It will provide you with an opportunity to find out more about the Focused Review. Refreshments will be available.

In 2019 the Parish Council completed the preparation of a Neighbourhood Plan for Elmsett when 93% of residents that voted supported Babergh District Council adopting the Plan and using it when making planning decisions.

Six years on, there is now a need to update one of the key planning policies in the Plan, the policy that determines where development would be allowed to take place.

In November 2023, Babergh District Council adopted Part 1 of a new Joint Local Plan for Babergh and Mid Suffolk districts. Whereas the previous Local Plan allowed development, including housing, to take place outside of defined "Built-Up Area Boundaries" where a need could be demonstrated, the new Local Plan (Policy SP03) limits all but specific exceptions of development to take place within "Settlement Boundaries". However, the same policy states that "Outside of the settlement boundaries, development will normally only be permitted where... it is in accordance with a made Neighbourhood Plan..."

The current Elmsett Neighbourhood Plan states that "Proposals for development located outside the Built-Up Area Boundary (BUAB) or Rookery Road Hamlet Settlement Boundary will only be permitted where it can be satisfactorily demonstrated that there is an identified local need for the proposal and that it cannot be satisfactorily located within the BUAB/Settlement Boundary."

The consequence of the adoption of the Local Plan is that our Neighbourhood Plan policy is now "out of sync" with many other neighbourhood plans across Babergh. As a result, Elmsett could come under pressure for further housing development outside the Settlement Boundaries if a developer can demonstrate to the District Council that a "local need" exists. There have already been a number of speculative housing applications, but they were unable to demonstrate a local housing need.

#### THIS CONSULTATION

The Review effectively replaces Chapter 's 4 (Planning Policy Context) and 7 (Planning Strategy) of the 2019 Plan with new and up-to-date chapters that will, if approved, bring our neighbourhood plan in-line with the newly adopted Local Plan and reduce the pressure for speculative development outside our settlement boundaries.

In a nutshell, we are amending two of the ten chapters of the 2019 Neighbourhood Plan to bring it up-to-date and bring the policy that determines where new development can take place in line with national and district policies.

Elsewhere in the Neighbourhood Plan, reference is made to the 2012 version of the National Planning Policy Framework. The most recent version of this was published in December 2023 and the references will also be updated in the Review.

This leaflet sets out the current Chapters 4 and 7 and the proposed new Chapters.



We are now consulting on the changes for a period of just over 6 weeks. We need your comments by 13 May 2024. The back page identifies how you can comment.

#### 2019 Neighbourhood Plan Policy

#### Policy EMST1 - Spatial Strategy

The Neighbourhood Plan area will accommodate development commensurate with Elmsett's designation as a Hinterland Village in line with Core Strategy Policy CS11. The focus for new development will be within the defined Built-Up Area Boundary as defined on then Proposals Map. Limited infill development may also be permitted within the boundary of the Rookery Road Hamlet Settlement Boundary identified on the Proposals Map.

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

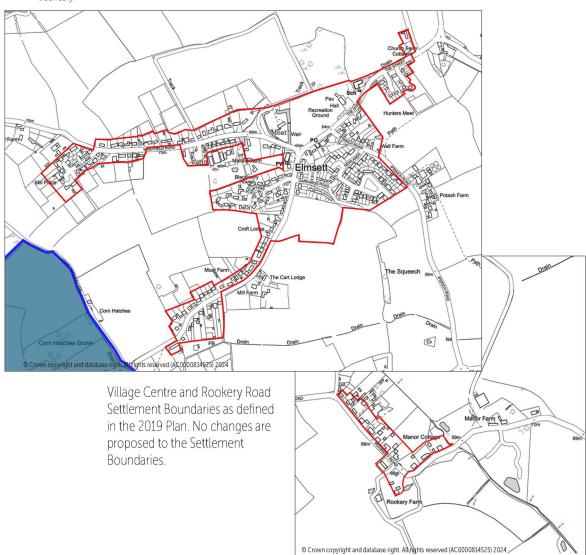
#### **Proposed new Policy**

#### Revised Policy EMST1 - Spatial Strategy

The Neighbourhood Area will accommodate development commensurate with the policies of the adopted Babergh and Mid Suffolk Joint Local Plan - Part 1.

The focus for new development will be within the defined Settlement Boundaries, as shown on the Proposals Map, where the principle of development is accepted.

Proposals for development located outside the Settlement Boundaries will only be permitted where they are in accordance with national, district and neighbourhood level policies and where they would not have a detrimental impact on infrastructure capacity, and heritage and landscape designations.



#### 2019 Neighbourhood Plan Chapter 4

#### 4. PLANNING POLICY CONTEXT

- 4.1 The regulations governing the preparation of Neighbourhood Plans require that they take account of the NPPF and be in general conformity with the strategic policies of the local development plan. In July 2018 the Government published a Revised NPPF that was to be used straight away for the purposes of making decisions on planning applications. However, for planning policy documents including Neighbourhood Plans, a "transition period" was introduced that would require all Neighbourhood Plans submitted to the local planning authority before 24 January 2019 to be examined against the 2012 NPPF. This Neighbourhood Plan was prepared within that context and submitted to Babergh District Council before 24 January 2019.
- **4.2** The 2012 NPPF requires that communities preparing Neighbourhood Plans should:
  - Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development.
  - Plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.
- 4.3 At a more local level, the Plan has been prepared in the context of the current status of the Babergh Local Plan, which comprises the Core Strategy and the "saved policies" of the 2006 Babergh Local Plan. Babergh District Council adopted a Core Strategy in February 2014. It provides the current strategic planning framework for Elmsett which this Neighbourhood Plan has had regard to. These documents are collectively referred to as "the local plan" in this document. In 2015 Babergh District Council announced their intention to produce a new Joint Local Plan (the emerging Local Plan) with Mid Suffolk District Council that would provide a planning framework for the management of growth across the two districts to 2036.
- 4.4 The adopted Core Strategy identifies a hierarchy of settlements ranked according to their size and the services they provide. It identifies Elmsett as a "hinterland village" within the "functional cluster" of Hadleigh, acknowledging that Hadleigh provides a range of and facilities to meet many of the needs of Elmsett's residents. The Core Strategy recognises that there are several larger villages (core villages) that provide a range of services and facilities for a cluster of villages around them. In so far as Elmsett is concerned, the saved policies of the 2006 Local Plan and the policies in the Core Strategy are those by which planning applications will be judged until replaced by a new local plan.
- 4.5 In 2015 the District Council commenced the preparation of a new Joint Local Plan in conjunction with Mid Suffolk. In August 2017 a consultation document was published and in July 2019 the Preferred Options Draft Joint Local Plan was published for consultation. The Preferred Options Draft Local Plan document identified Elmsett as a Hinterland Village and made provision for a minimum 50 additional dwellings between April 2018 and 2036 (which includes outstanding planning permissions granted as at 1 April 2018).

#### **Proposed Replacement Chapter 4**

#### 4. PLANNING POLICY CONTEXT

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

#### National Planning Policy Framework

- 4.2 The National Planning Policy Framework (NPPF) sets out the Government's high-level planning policies that must be taken into account in the preparation of development plan documents and when deciding planning applications. In December 2023 the Government published a Revised NPPF. The Framework sets out a presumption in favour of sustainable development. Paragraph 11 of the NPPF states: "Before Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:
  - a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
  - strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
    - the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
    - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".
- 4.3 Paragraph 29 of the NPPF states that: "Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies."

#### The Local Plan

- 4.4 At a more local level, the Neighbourhood Plan has been prepared in the context of the current Babergh Local Plan, which comprises the Babergh and Mid Suffolk Joint Local Plan Part 1, adopted in November 2023 and referred to as JLP1 in this Neighbourhood Plan. It provides a set of strategic and local development management policies, which will be used to inform decisions on planning applications and appeals. These do not need to be repeated in the Neighbourhood Plan but which the Neighbourhood Plan can complement by adding locally based detail.
- 4.5 Part 2 of the Joint Local Plan is to be prepared during the coming years, with adoption currently scheduled for Autumn 2026. It will identify a settlement hierarchy for the two local authority areas, the distribution of any further housing growth

#### 2019 Neighbourhood Plan Chapter 4 (continued)

- 4.6 At this time the Joint Local Plan is at a very early stage of preparation and, therefore, is not a matter that has been given weight in the preparation of this Neighbourhood Plan. The emerging Local Plan will not be adopted before the Neighbourhood Plan is "made" by the District Council. As such, the Neighbourhood Plan has been prepared to conform with the policies in the adopted Local Plan documents, while having regard to the status and content of the emerging Local Plan.
- 4.7 As previously noted in paragraph 1.5, when work commenced on the preparation of the Neighbourhood Plan, Babergh did not have a five-years supply of available housing land, as required by government policy. However, the 2017-18 Mid Suffolk and Babergh Annual Monitoring Report published in July 2018, concluded that a five-years supply was available as at 1 April 2018.
- 4.8 Given the status of the Joint Local Plan and the fact that the Neighbourhood Plan will be completed before the Local Plan is adopted, the Core Strategy and saved policies of the 2006 Local Plan remain the district planning policies, along with the NPPF. Regard has been given to these in preparing this Plan while not seeking to contradict the emerging strategic policies of the Joint Local Plan.

#### Proposed Replacement Chapter 4 (continued)

- and identify any sites required to meet that growth. At the time of preparing the Neighbourhood Plan, the District Council had commenced a "call for sites" that landowners/developers would like to be considered for allocation in Part 2.
- 4.6 In July 2020, Suffolk County Council adopted the Minerals and Waste Local Plan which is part of the strategic policy framework for the area. Much of the parish does fall within a Minerals Consultation Area and the District Council will consult the County Council on planning applications that fall within this area.



#### 2019 Neighbourhood Plan Chapter 7

- 7.1 As noted above, the planning policy framework for Babergh is currently evolving from that which is set out in the Core Strategy (2014) to a new Joint Local Plan for Babergh and Mid Suffolk districts. The Neighbourhood Plan has been prepared ahead of the Joint Local Plan being adopted and the strategy for the village is based on the continuation of the Hinterland Village designation as designated in the current adopted Core Strategy.
- 7.2 Core Strategy Policy CS2 designates Elmsett as a Hinterland Village which will "accommodate some development to meet the needs within them" and where "All proposals will be assessed against Policy CS11."
- 7.3 Core Strategy Policy CS11 has three key strands to it that are relevant to setting the policy context to the Elmsett Neighbourhood Plan. In summary, it states that development proposals will be approved where:
  - i. proposals score positively when assessed against Policy CS15;
  - ii. a series of matters identified in the policy are addressed; and
  - iii. proposals are able to demonstrate a close functional relationship to the existing settlement sites.

#### **Proposed Replacement Chapter 7**

#### Context

- 7.1 The planning policy framework for the Parish is established in the adopted Babergh Mid Suffolk Joint Local Plan Part 1 (November 2023) and the 2020 "made" Elmsett Neighbourhood Plan. The term "Built Up Area Boundary" has been superseded in the Joint Local Plan and they are now known as Settlement Boundaries.
- 7.2 The principle of development within Settlement Boundaries is accepted, in principle, while there is a general presumption against development outside them, unless this is allowed for by national or specific local policies. The level of services and facilities in the village as well as the limited accessibility to higher order settlements means that only limited housing growth is appropriate in the village over the period of the Plan. It is, however, essential that the growth is focused on the existing built-up area of the village where there is a close relationship with accessibility of the existing services and facilities.
- 7.3 Part 1 of the Joint Local Plan does not define a settlement hierarchy across Babergh nor allocate sites for development. These matters are being addressed in the emerging Part 2 of the Joint Local Plan, planned for completion in 2026. As such, there is no housing requirement for Elmsett that the Neighbourhood Plan has to meet.

- 7.4 The sites identified for development in this Neighbourhood Plan satisfy these criteria.
- 7.5 A central principle of this Plan is to support limited and sustainable growth in Elmsett that doesn't have an irreversible impact on the historic and natural environment of the area. Elmsett has been in receipt of modest growth over a number of years, in the form of small estates and infill plots. This approach is expected to continue throughout the life of this Plan.
- 7.6 The level of services and facilities in the village as well as the limited accessibility to higher order settlements means that only limited housing growth is appropriate in the village over the period of the Plan. It is, however, essential that the growth is focused on the existing built-up area of the village where there is a close relationship with accessibility of the existing services and facilities.
- 7.7 A Built-Up Area Boundary (BUAB) is defined for the main built-up area of the village in order to manage the location of future development and ensure that the location of new development is well related to existing services and facilities. The boundary is based on that contained in the 2006 Local Plan but has been reviewed to reflect recent changes and opportunities for new development that will arise during the Neighbourhood Plan period. In order to manage the potential impacts of growth, new development will be focused within the BUAB. In addition, a "hamlet" is also defined at Rookery Road where there is a definable cluster of at least 13 dwellings. Through the course of the lifetime of the Plan there may be opportunities for sensitively designed infill dwellings or replacement dwelling to be constructed within the Rookery Road "hamlet".
- 7.8 In accordance with Policy CS11 of the Babergh Core Strategy, there may be opportunities for limited growth adjoining but outside the BUAB, However, such an approach to development must respect the landscape quality and setting of the village and not result in further ribbon development along the roads leading from the village centre. Furthermore, it would not be sustainable to allow development that would increase the extent of the Rookery Road area and, as such, the policy approach of CS11 does not apply to the Rookery Road hamlet designation.
- 7.9 There may be situations where it is necessary for development to take place away from the BUAB, but proposals outside the BUAB will need to be supported by evidence to demonstrate why the proposal has to be located there. However, this approach does not restrict the conversion of agricultural buildings to new uses where proposals meet the government regulations and local planning policies for such conversions.



7.4 Policy SP03 of the Part 1 Joint Local Plan sets out where new development would be supported, but the approach is very high level with general references to windfall development in accordance with the policies in Neighbourhood Plans or elsewhere in the Joint Local Plan.

#### **Settlement Boundaries**

- 7.5 The Neighbourhood Plan Review confirms the Settlement Boundaries of the 2019 Plan.
- 7.6 In accordance with Policy SP03 of the Joint Local Plan, the spatial strategy for Elmsett supports the principle of development within the defined settlement boundaries subject to the consideration of the impact of the proposal as assessed against other policies in the Joint Local Plan Part 1 and Neighbourhood Plan, such as
  - the presence of heritage assets;
  - the landscape setting of the village;
  - the capacity of services and infrastructure;
  - the potential impact on the amenity of existing residents; and
  - the impact of development on the wider area.

This approach will ensure that the largely undeveloped countryside will remain preserved.

7.7 There may be situations where it may be adequately demonstrated that it is necessary for development to take place outside the Settlement Boundaries. However, this will be limited to that which is specifically supported by the NPPF, the Joint Local Plan - Part 1 and the Neighbourhood Plan. Table 5 of the Joint Local Plan - Part 1 identifies the types of development that would, subject to other considerations, be supported outside settlement boundaries.

For the purposes of this consultation, market housing schemes outside the Settlement Boundary would not be supported by the Joint Local Plan.



#### What next?

Once this consultation is complete, the Parish Council will review the comments and submit the Review to Babergh District Council. The District Council will then carry out further consultation and submit the Review documents and comments to an Independent Examiner. The Examiner will decide whether any changes are required and whether the Review needs to be the subject of a Parish Referendum. At this stage the Parish Council feels that a further Referendum will not be necessary. When the Review is complete, the new policy will be used when planning applications in the parish are considered by Babergh District Council.





#### **HOW TO COMMENT**

We welcome your comments on the Review, even if you fully support the proposed changes. Demonstrating support will help the Examiner know what the local feelings are. You can comment by either competing the slip below and returning it to The Clerk, Moat Farm, Hadleigh Road, Elmsett IP7 6ND or, if you are able, by completing the response online at



www.smartsurvey.co.uk/s/Elmsett/

Notice (available on their website).

You can also respond on a mobile device by scanning this QR Code

Consultation Questions
1. Do you support Revised Policy EMST1 - Spatial Strategy? Yes No Unsure
Comments
2. Do you have any comments on the new Chapter 4? Yes No
Comments
3. Do you have any comments on the new Chapter 7? Yes No
Comments
Data Protection Notice: All information collected and processed by the Parish Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended).  Please note: All comments received will be made publicly available and will be identifiable by name / organisation. All other personal information provided will be protected in accordance with the Data Protection Act 2018.
Name
Address (optional)
EMAIL (optional)
Would you like to be notified when the Parish Council submits the Review to Babergh District Council? (if yes, please provide either address or email address above) Yes No
Would you be willing to have your contact details shared with Babergh District Council for the sole purpose of enabling that Council to keep you informed of further consultations on the Review? YES NO
Data will be processed by Babergh District Council in accordance with their information security policies and Privacy

Elmsett Neighbourhood Plan Review Public Consultation

March 2024 Elmsett Parish Council

#### **Appendix 2 – Review Consultation Launch Event Display**

## Elmsett Neighbourhood Plan Review 2024

## Thanks for coming to our information event The exhibition that follows will explain:

- What a neighbourhood plan is
- The history of neighbourhood planning in Elmsett
- Why we need to review the Plan we completed in 2019
- What the changes are
- How you can comment on the new Draft Plan
- What will happen after today

#### What is a Neighbourhood Plan?

It is a relatively new kind of planning document designed to allow local people to play an active part in planning their area. National When complete, the Plan will form **Planning Policy** Framework part of the statutory development (NPPF) plan for the area, meaning the Planning **Applications** District Council and Planning Inspectors will have to take note of what it says when considering The Local Plan planning applications. Neighbourhood sits alongside national and local planning

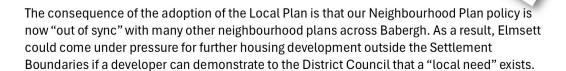
The current Plan

Following support of 93% of those that voted at a Parish Referendum, our Neighbourhood Plan was adopted in December 2019

It contains 16 planning policies that are used by Babergh Council when deciding planning applications

Five years on, there is now a need to update the policy in the Plan that determines where development would be allowed to take place.

In November 2023, Babergh District Council adopted Part 1 of a new Joint Local Plan for Babergh and Mid Suffolk districts.



The Review effectively replaces Chapter 's 4 (Planning Policy Context) and 7 (Planning Strategy) of the 2019 Plan with new and up-to-date chapters

If approved, it will bring our neighbourhood plan in-line with the newly adopted Local Plan and reduce the pressure for speculative development outside our settlement boundaries.

In a nutshell, we are amending two of the twelve chapters of the 2019 Neighbourhood Plan to bring it up-to-date and bring the policy that determines where new development can take place in line with national and district policies.

Elsewhere in the Neighbourhood Plan, reference is made to the 2018 version of the National Planning Policy Framework. The most recent version of this was published in December 2023 and the references will also be updated in the Review.

We are now consulting on the changes for a period of just over 6 weeks. We need your comments by 13 May 2024.

# The Proposed Changes

We've published a leaflet that sets out all the proposed changes.

The leaflet has been distributed to every household in the Parish.

This and the following boards provide a summary of the changes.

#### Chapter 4 Changes

Chapter 4 of the Neighbourhood Plan is titled Planning Policy Context

It provides details of national and local planning policies against which the Neighbourhood Plan has been prepared.

At a national level, the Government's National Planning Policy Framework (NPPF) has been amended a number of times since 2020 and the Neighbourhood Plan Review brings the references to the Framework up-to-date.

Locally, Babergh District Council adopted Part 1 of a new Joint Local Plan for Babergh and Mid Suffolk in November 2023. It means that the references to Local Plan policies in the Neighbourhood Plan are now out of date.

In particular, whereas the previous Local Plan made provision for housing development to take place outside defined Built-Up Area Boundaries <u>if a local need for it could be demonstrated</u>, the new Local Plan states:

- The principle of development is established within settlement boundaries [formerly Built-Up Area Boundaries] in accordance with the relevant policies of this Plan.
- Outside of the settlement boundaries, development will normally only be permitted where:
  - a) the site is allocated for development, or
  - b) it is in accordance with a made Neighbourhood Plan, or
  - it is in accordance with one of the policies of this Plan listed in Table 5; or
  - d) it is in accordance with paragraph 80 of the NPPF (2021).

#### By way of explanation:

- There are no sites allocated for development in Elmsett outside the Settlement Boundary
- The Neighbourhood Plan makes provision for affordable housing on "exception sites" outside the Settlement Boundary, in accordance with national policies.
- Table 5 is reproduced right
- Paragraph 80 (now 84) of the NPPF is reproduced right

#### Local Plan Table 5

Policies permitting development outside settlement boundaries, subject to the development's accordance with the other relevant policies of the Plan

Local Plan Policy	Provisions
SP04 (1)	development of sites for Gypsies and Travellers and Travelling Showpeople
SP05 (1, 2 and 5)	development on strategic employment sites, at Brantham and along strategic transport corridors
SP07 (1 and 2)	sustainable tourism development where it accords with LP12 (2) $ \label{eq:LP12} $
SP08 (1)	development enabling the delivery of key strategic infrastructure projects
LP01(1)	infill housing development
LP02 (1)	residential annexes
LP03 (1)	residential extensions and conversions
LP04 (1 and 2)	replacement dwellings and conversions
LP05 (1)	rural worker dwellings
LP07 (1 and 2)	community-led housing and rural exception site housing
LP09 (2)	change of use to small scale employment development
LP10 (2)	change from employment use
LP12 (2)	tourism and leisure development
LP13 (1 and 4)	tourist accommodation and removal of holiday occupancy conditions
LP14(1)	intensive livestock and poultry farming, subject to LP14 (2) $$
LP19 (3a)	re-use /redevelopment of a heritage asset
LP20 (1)	change of use of land for equestrian purposes or other similar animal based uses
LP21(1)	change of use of agricultural land to residential garden
LP22 (1)	new agricultural buildings where there is demonstrable evidence to justify the need for them
LP25 (1)	sources, storage and distribution of energy
LP28 (1a)	new accessible local services and community facilities where in accordance with LP28 (1b) $$
LP31(3)	new health or education facilities

#### NPPF Paragraph 84

- 84. Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:
  - a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
  - b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
  - the development would re-use redundant or disused buildings and enhance its immediate setting;
  - d) the development would involve the subdivision of an existing residential building; or
  - e) the design is of exceptional quality, in that it
  - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
  - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

# The Proposed Changes

#### Chapter 7 Changes

Chapter 7 of the Plan sets out a strategy for the location of future development.

The current Plan was written to be in accordance with the Babergh Core Strategy planning document (2014).

The Core Strategy allowed development, including housing, to take place outside of defined "Built-Up Area Boundaries" where a need could be demonstrated.

As illustrated on the previous board, the new Local Plan limits development to take place within "Settlement Boundaries" unless there are specific exceptions.

However, the same Local Plan policy states that "Outside of the settlement boundaries, development will normally only be permitted where... it is in accordance with a made Neighbourhood Plan...".

The current Elmsett Neighbourhood Plan states that "Proposals for development located outside the Built-Up Area Boundary (BUAB) will only be permitted where it can be satisfactorily demonstrated that there is an identified local need for the proposal and that it cannot be satisfactorily located within the BUAB (Settlement Boundary)."

The consequence of the adoption of the Local Plan is that our Neighbourhood Plan policy is now "out of sync" with many other neighbourhood plans across Babergh. As a result, Elmsett could come under pressure for further housing development outside the Settlement Boundary if a developer can demonstrate to the District Council that a "local need" exists.

The Neighbourhood Plan Review updates Chapter 7 to bring it in line with the new Joint Local Plan and also includes revising Policy ALD1 to remove the possibility of market housing being proposed outside the Settlement Boundary if a local need can be identified.

The Settlement Boundary is illustrated below.

#### Current Policy

#### Current Policy EMST1 – Spatial Strategy

The Neighbourhood Plan area will accommodate development commensurate with Elmsett's designation of a Hinterland Village in line with Core Strategy Policy CS11. The focus for new development will be within the defined Built-Up Area Boundary, as defined on the Proposals Map. Limited infill development may also be permitted within the boundary of the Rookery Road Hamlet Settlement Boundary identified on the Proposals Map.

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

#### Proposed Policy

#### New Policy EMST1 - Spatial Strategy

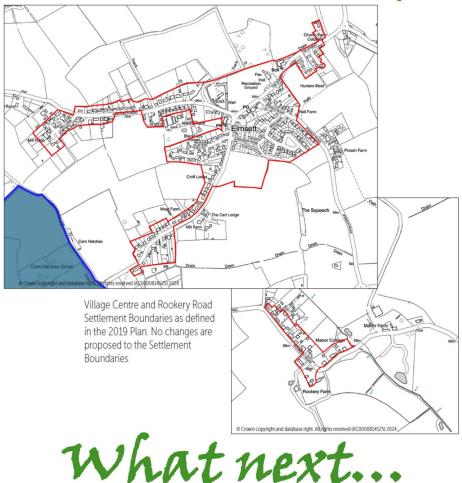
The Neighbourhood Area will accommodate development commensurate with the policies of the adopted Babergh and Mid Suffolk Joint Local Plan - Part 1.

The focus for new development will be within the defined Settlement Boundaries, as shown on the Policies Map, where the principle of development is accepted.

Proposals for development located outside the Settlement Boundaries will only be permitted where they are in accordance with national, district and neighbourhood level policies and where they would not have a detrimental impact on infrastructure capacity, and heritage and landscape designations.

#### Do you agree with the new Policy EMST1?

## Settlement Boundaries



- Once this consultation is complete, the Parish Council will review the comments and submit the Review to Babergh District Council.
- The District Council will then carry out further consultation and submit the Review documents and comments to an Independent

  Framiner.

  The District Council will then carry out further consultation and submit the Review documents and comments to an Independent

  Framiner.

  The District Council will then carry out further consultation and submit the Review documents and comments to an Independent

  Framiner.
- The Examiner will decide whether any changes are required and whether the Review needs to be the subject of a Parish Referendum.
- At this stage the Parish Council feels that a further Referendum will not be necessary.
- When the Review is complete, the new policy will be used when planning applications in the parish are considered by Babergh District Council.



Babergh 2nd consultation



Independent Examination



Possible Referendum

Don't forget that we need your comments by 13 May 2024. Why not comment online while you're here using the QR Code?



### Appendix 3 – Statutory Consultees Notified of Regulation 14 Consultation

MP for South Suffolk

County Cllr to Cosford Electroral Division

County Cllr to Belstead Brook Electoral Division

County Cllr to Hadleigh Electoral Division

Ward Cllr to South East Cosford, Babergh District Council

Ward Cllr to Copdock and Washbrook, Babergh District Council

Ward Cllr to Hadleigh North, Babergh District Council

Ward Cllrs to Hadleigh South, Babergh District Council

Ward Cllr to Balakenham, Mid Suffolk District Council

Ward Cllr to Battisford and Ringshall, Mid Suffolk District Council

Parish Clerk, Flowton Parish Meeting

Parish Clerk, Offton & Willisham Parish Council

Parish Clerk, Somersham Parish Council

Parish Clerk, Chattisham & Hintlesham Parish Council

Parish Clerk, Aldham Parish Council

Parish Clerk, Whatfield Parish Council

Parish Clerk, Hadleigh Town Council

Corporate Manager - Strategic Planning, Babergh & Mid Suffolk District Councils

SCC Neighbourhood Planning, Suffolk County Council

Land Use Operations, Natural England

Essex, Norfolk & Suffolk Sustainable Places Team, Environment Agency

East of England Office, Historic England

East of England Office, National Trust

Town Planning Team, Network Rail Infrastructure Limited

Highways England

Stakeholders & Networks Officer, Marine Management Organisation

British Telecom

Cornerstone Telecommunications Infrastructure Limited

Vodafone and O2 - EMF Enquiries

Three

ΕE

Suffolk NHS

National Gas

National Grid

**UK Power Networks** 

Spatial Planning Advisor, Anglian Water

Essex & Suffolk Water

DIO Assistant Safeguarding Manager, Defense Infrastructure Organisation

National Federation of Gypsy Liaison Groups

Norfolk & Suffolk Gypsy Roma & Traveller Service

Diocese of St Edmundsbury & Ipswich

Chief Executive Suffolk Chamber of Commerce

New Anglia LEP

Freeport East

Conservation Officer, RSPB

Senior Planning Manager, Sport England (East)

Suffolk Constabulary
Ecology and Planning Advisor, Suffolk Wildlife Trust
Suffolk Preservation Society
Community Action Suffolk
Dedham Vale Society
National Landscape Essex and Suffolk
Theatres Trust
East Suffolk Internal Drainage Board

#### **Appendix 4 – Statutory Consultee Consultation Notice**

### ELMSETT (BABERGH) NEIGHBOURHOOD PLAN REVIEW – PRE-SUBMISSION CONSULTATION (REGULATION 14)

Dear Sir / Madam

As part of the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended), Elmsett Parish Council is undertaking a Pre-Submission Consultation on the Draft Elmsett Neighbourhood Plan Focused Review. This is a review of two chapters and one policy of the Neighbourhood Plan which was made by Babergh District Council on 10 December 2019. The District Council has provided your details as a body/individual we are required to consult and your views on the Draft Focused Review would be welcomed.

The full plan and supporting documents can be viewed at https://elmsett.onesuffolk.net/neighbourhood-plan/ together with information on how to send us your comments. The made Plan can be viewed <a href="https://elmsett.onesuffolk.net/neighbourhood-plan/">https://elmsett.onesuffolk.net/neighbourhood-plan/</a> together with information on how to

This Pre-Submission Consultation runs until Monday 13 May 2024

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

Clerk Elmsett Parish Council

### Appendix 5 – Summary of Responses

1.	1. Do you support Revised Policy EMST1 - Spatial Strategy?						
Α	nswer Choices	Response Percent	Response Total				
1	Yes		95.35%	41			
2	No		0.00%	0			
3	Unsure		4.65%	2			
			answered	43			
	skipped 0						
С	Comments: (12)						

2	2. Do you have any comments on the new Chapter 4?						
Α	nswer Choices	Response Percent	Response Total				
1	Yes		16.22%	6			
2	No		83.78%	31			
		а	answered	37			
	skipped 6						
С	Comments: (6)						

3	3. Do you have any comments on the new Chapter 7?						
Α	nswer Choices	se Response t Total					
1	Yes	30.77%	12				
2	No	69.23%	27				
		answere	d 39				
	skipped 4						
С	Comments: (12)						

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

The tables in this appendix set out the comments that were received during the Pre-Submission Consultation Stage and the responses and changes made to the Plan as a result of the comments.

Name	Organisation	Comment	Parish Council response	Proposed changes
Policy EMST1	- Spatial Strategy			
J Dawkins	Search holdings	The area is being bombarded with new developments causing an increase on transport roads pollution ext ans a loss to local environmental areas	Noted. The NP seeks to minimise the local impacts of future development	None
D Downes		Sadly when allowing planning, the powers that be, including Highways Authority have no consideration for the existing local population re noise pollution, lack of road infrastructure and lack of facilities. It's like a blind rush into disaster.	Noted. The NP seeks to minimise the local impacts of future development	None
B Chambers		Yes will support revised plans.	Noted	None
M Brett		As in the existing EMST1, should "an identified local need" wording be included as well?	Such a phrase would now be contrary to the Strategic policies of the Local Plan	None
B Thorpe		I am happy with the new proposal. Although I am hoping to move and stay in the village. I have seen enough development at present.	Noted	None

Name	Organisation	Comment	Parish Council response	Proposed changes
L Boniface		I appears that the Malting Development in Elmsett currently underway in fact outside the red line	This can be addressed in a fuller review or by the Part 2 Joint Local Plan.	None
R Fox		Yes but I am concerned that the policy can easily be set aside where the proposed development is "in accordance with national, District and Neighbourhood Policies"?	Those policies are restrictive on the type of development that can take place outside a Settlement Boundary	None
B Hall		I fully support the new proposed Revised policy EMST1- Spacial Strategy.	Noted	None
Mr & Mrs Pegington		We support the general principal and boundaries set out - in the plan -	Noted	None
R & D Wilson		Anything that restricts more and more building in the village must be good. Strengthening the boundary must benefit us all.	Noted	None
K Smith		Important for Neighbourhoods to be in line with Babergh	Noted	None
A Newman		Following the adoption of Part 1 of the new Local Plan for Babergh and Mid Suffolk in November 2023 it is very important, in my view, that the village of Elmsett keeps its Neighbourhood Plan policies updated. I therefore fully Support the proposed revision of the Spatial Strategy Policy EMST1 and the modifications to chapters 4 and 7 of the existing Neighbourhood Plan.	Noted	None
	Suffolk CC	We note the changes proposed to Policy EMST1 Spatial Strategy.	Noted	None

Name	Organisation	Comment	Parish Council response	Proposed changes
Chapter 4				
B Chambers		Yes agree with the new chapter 4 changes.	Noted	None
J Carruthers	Babergh District Council	As member of Babergh District Council's Planning Committee I welcome the Elmsett Neighbourhood Plan. It is important to take local residents views into account and having a Neighbourhood Plan does this. Part 1 of the Joint Local Plan has been adopted with part 2 due next year. I wonder if your Neighbourhood Plan will be updated in light of this.	At this stage it is not anticipated that there will be a need for further updating as a result of the Part 2 Joint Local Plan	None
L Boniface		"NEED" must always refer to the demonstrated need of local people Not the need of developers to make more money without reference too the local population	Noted	None
R Fox		I am concerned theat the District Council is actively encouraging planning applications in its "call for sites" This seems to be ignoring local opinion	The call for sites is a requirement of preparing Local Plans that allocate sites. It is separate from the consideration of planning applications	None
M Harris		One can only hope that this revision will be more effective at giving Elmsett community a fully effective plan	Noted	None
Mr & Mrs Pegington		Good that the Parish Council is "on it". We support the strengthening arrangements to meet the latest rules so that local views are taken into account –	Noted	None

Name	Organisation	Comment	Parish Council response	Proposed changes
	Suffolk CC	We note the changes proposed to Chapter 4, and welcome the reference to the Suffolk Minerals and Waste Local Plan 2020 in paragraph 4.6.	Noted	None
	Babergh DC	At this stage we have no specific comments to make on these but, for context, you might want to consider the following:	Noted	None
		amending paragraph 4.1 to read: 'Neighbourhood Plans must have regard to the content of the National Planning Policy Framework (NPPF) and the relevant Local Plan documents. Our original Plan (adopted in December 2019) was prepared in the context of the 2012 NPPF, the 2014 Babergh Core Strategy, and the saved policies from the 2006 Babergh Local Plan. With changes to all, it has been necessary to update our Plan in part to now have regard to the latest NPPF and Local Plan documents that cover the parish. The paragraphs below identify these and explains how they are relevant to our Plan.'	Paragraph 4.1 will be amended	Amend Para 4.1 as suggested
		amending the first sentence of paragraph 4.4 to read:	Paragraph 4.4 will be amended	Amend Para 4.4 as suggested
		'In November 2023, Babergh District Council adopted a new Local Plan, the Babergh and Mid Suffolk Joint Local Plan - Part 1 [referred to as		

Name	Organisation	Comment	Parish Council response	Proposed changes
		'JLP1 in this document]. JLP1 provides a set of		
		strategic and local development management		
		policies, which will be used to inform decisions		
		on planning applications and appeals. These do		
		not need to be repeated here but our  Neighbourhood Plan can complement JLP1 by		
		adding locally based detail.		
		adding locally based detail.		
Chapter 7				
B Chambers		Yes agree with the proposed changes, to future planning.	Noted	None
B Clifford		I would be very disappointed if item 7:7 was	Noted	None
		used as a get out for item 7:6		
M Brett		7.2 This is only the wording but the first	Agreed, the paragraph	Amend Para 7.2
		sentence seems odd as "principle" is used twice	will be amended	to reflect
		which seems illogical and perhaps conflicting.		comment
		This is only my view but I think I would change		
		to:		
		The principle of development within the Settlement Boundaries is accepted and whilst		
		there is a general presumption		
		This assumes a) that it can be changed b) others		
		may disagree, which is fine.		
J Green		I'm assuming this should say Chapter 5?	Noted	None
		I support development within the defined		
		settlement boundaries but would object to		
		development outside these boundaries due to		
		the lack of services and infrastructure - and also		

Name	Organisation	Comment	Parish Council response	Proposed changes
		to preserve the rural countryside and the		
		important gap that separates our 2 villages		
M Quinn		The village can not support any further development let alone deal with the consequences of the construction process itself, as witnessed by the damage and indeed the destruction of the road infrastructure caused by the recent building projects.	Noted	None
Moya Quinn		We have lost the shop partly due to the damage caused by the so called development of the village. We cannot cope with any future development. The infrastructure is simply not up to it.	Noted	None
A Morton		7.3 Does this mean that a new set of housing requirements will be established in 2026 when Part 2 of the Joint Local Plan comes into being?	Part 2 of the Joint Local Plan will address site allocations across Babergh district.	None
		7.5 Shouldn't the Settlement Boundary be revised to take into account the 18 properties being constructed at Malting Farm?	This can be addressed in a fuller review or by the Part 2 Joint Local Plan.	
L Boniface		Consultations with local organisations, local population, Parish Council will be crucial to ensure the points, esp, 7.6, are adhered to	Noted	None
R Fox		I deplore the use of 'public money' by local authorities for what I am sure is very expensive public relations exercise. It could have been	Noted	None

Name	Organisation	Comment	Parish Council response	Proposed changes
		better spent on roads, which are quite incapable of supporting any further development.		
J Bottley		I suggest a moratorium on any further building projects for a period of 20 years. We have seen by the plethora of building projects currently in progress that the village infrastructure is inadequate to cope with such large scale disruption such as we are witnessing at the present time.	The Neighbourhood Plan is not allowed to do this.	None
B Hall		7:6 I believe that the plan should stress the poor transport access to the village. Currently the Aldham Road to Hadleigh is closed, and in April the Whatfield Road will be closed, leaving one single track road to the A1071	This matter is noted elsewhere in the Plan	None
Mr & Mrs Pegington		we strongly feel that further building/development outside the boundary lines for Elmsett is not appropriate as the current infrastructure (roads and schools) will not support it, as we all know currently.	The Plan does not support further development outside the Settlement Boundary except in limited and specific circumstances	
	Suffolk CC Babergh DC	We note the changes proposed to Chapter 7.  With our comment above in mind, amend the first sentence of paragraph 7.1 to read: ' 'The planning policy framework for the Parish is now established in the adopted Babergh Mid Suffolk Joint Local Plan Part 1 (November 2023) and the 2020-2019 "made" Elmsett Neighbourhood Plan. The term [etc].'	Noted Paragraph 7.1 will be amended	None Amend Para 7.1 as suggested

Name	Organisation	Comment	Parish Council response	Proposed changes
General Con	nments			
	Anglian Water	Thank you for consulting Anglian Water on the focused review of the Elmsett Neighbourhood Plan.	Noted	None
		We are not aware of any changes that would cause us to raise any objections and wish you every success in taking your plan forward.		
	Historic England	Thank you for inviting Historic England to comment upon the ongoing Pre-Submission Consultation on the Draft Elmsett Neighbourhood Plan Focused Review.	Noted	None
		We have reviewed the information supplied and note the proposed changes which update the adopted Plan to bring it in-line with the newly adopted Local Plan and revised NPPF (2023). We do not wish to make any additional comments at this stage.		
	National Highways	Thank you for your correspondence, dated on 15 March 2023, notifying National Highways of the consultation under Regulation 14.	Noted	None
		National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area		

Name	Organisation	Comment	Parish Council response	Proposed changes
		within and surrounding the Elmsett Neighbourhood Plan we have responsibility for the trunk road A14.		
		The amendment proposes to modify the existing made plan to amend the Policy EMST 1 – Spatial Strategy to bring it into line with recently adopted Babergh and Mid Suffolk Joint Local Plan Part 1, would not have any predicted adverse impact on the Strategic Road Network (SRN).		
		We do not have any more comment of this.		
	Natural England	Thank you for your consultation on the above dated 15 March 2024.	Noted	None
		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		

Name	Organisation	Comment	Parish Council response	Proposed changes
		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 neighbourhood plan review.		
		However, we refer you to the attached annex [available from the Parish Clerk on request] 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		

Name	Organisation	Comment	Parish Council response	Proposed changes
		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		changes
		the scoping and environmental report stages.		

Name	Organisation	Comment	Parish Council response	Proposed changes
	Suffolk CC	Thank you for consulting Suffolk County Council (SCC) on the Pre-Submission version of the Elmsett Neighbourhood Plan (Focused Review).  Specific comments from SCC are inserted above  SCC has no further comments at this time, and wishes to be updated as this plan progresses.	Noted	None
	Babergh DC	This response is made for and on behalf of Robert Hobbs (Corporate Manager for Strategic Planning at Babergh & Mid Suffolk District Councils).	Noted	None
		Thank you for consulting us on the proposed changes to Chapter 4 (Planning Policy Context), Chapter 7 (Planning Strategy), and to Policy EMST1 (Spatial Strategy). At this stage we have no specific comments to make on these but, for context, you might want to consider the following: Specific comments from BDC are inserted above	Noted	None
		We also note that the Parish Council (the Qualifying Body) have issued a Regulation 14 Modification Proposal Statement in which they set out that they "consider that the nature of the modifications to be not so significant or	Noted	None

Name	Organisation	Comment	Parish Council response	Proposed changes
		substantial as to change the nature of the made Plan" and that their Review Plan "would require examination but, subject to the decision of the independent examiner, would not require a referendum". The District Council are minded to agree with this and will issue an appropriate statement to that effect at the relevant time.  Aside from the specific changes proposed through this focused consultation exercise, there are also other opportunities to make nonmaterial amendments to the final Review Plan that would, in our opinion, help bring the whole plan up to date.	The Plan will be brought up-to-date	Bring general content of Plan up-to-date
		Para 1.5 (also para 4.7) - This explains that one of the original reasons for preparing this Plan was a response to the consequences of this Council not having a sufficient housing land supply position. Our 'five year' position has improved since April 2017 and the latest available published figures (at 1 April 2022), showed that we had 7.13 years supply of deliverable sites. In the updated plan you might want to consider adding a footnote or similar to paragraph 1.5 / paragraph 4.7 to acknowledge the changed position.	The Plan will be amended as suggested	Amend Para 1.5 and 4.7

Name	Organisation	Comment	Parish Council response	Proposed changes
		Chapter 1 / para 1.21 - Consider adding a sentence to explain that, following a referendum, the Elmsett NP was adopted by Babergh District Council in December 2019 and include a short new paragraph to outline which parts of the plan have been updated through this review.	The Plan will be amended as suggested	Insert new Para 1.22
		Policy EMST3 (Land at Hadleigh Road) - Our provisional 2023/24 year-end monitoring data shows that approx. 50% of the site has been completed. In the updated Plan you may want to consider inserting a note into this policy that says something like: 'Site update: As of the end of March 2024, this site is approx.50% complete.'	Given that the development allocated in Policy EMST3 is largely complete, the policy will be deleted from the Plan.	Delete Policy EMST3
		<ul> <li>Chapter 8 - some paragraphs could also benefit from contextual updates, for example:</li> <li>para 8.2 could explain that 'the housing figures were those set out in the 2014 Babergh Core Strategy The Joint Local Plan was at an early stage the numbers identified for Elmsett could not be relied upon'</li> </ul>	The Plan will be brought up-to-date	Amend Para 8.3
		• para 8.4 could explain that the "standard methodology" referred to in the 2012 NPPF was used to calculate a requirement.	The Plan will be brought up-to-date	Amend Para 8.4

Name	Organisation	Comment	Parish Council response	Proposed changes
		We leave these additional suggestions with you.		