

Babergh District Council

Elmsett Neighbourhood Plan Review 2025

Submission Draft consultation responses

In late March 2025, Elmsett Parish Council (the 'qualifying body') submitted their draft 'Neighbourhood Plan Review' 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 12 May until Wednesday 25 June 2025.

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

Elmsett Parish Council were also given an opportunity to respond to new issues raised at this stage. Their response is included at the end of the document.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Babergh District Council
(3)	Aldham Parish Council
(4)	Historic England
(5)	Natural England
(6)	Environment Agency
(7)	National Landscape Team
(8)	Suffolk Wildlife Trust
(9)	National Highways
(10)	Avison Young (obo National Gas Transmission)
(11)	Response from Elmsett Parish Council

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(1) SUFFOLK COUNTY COUNCIL

Date: 18th June 2025
Enquiries to: Busranur Serin
Tel: 01473 265631
Email: neighbourhoodplanning@suffolk.gov.uk



Planning Policy Team,
Babergh District Council,
Endeavour House,
8 Russell Road,
Ipswich,
IP1 2BX

Dear Paul Bryant,

Submission Consultation draft of the Elmsett Neighbourhood Plan Review 2025

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation draft of the Elmsett Neighbourhood Plan review.

SCC welcomes the changes made to the plan for the focused review. SCC has no further comments at this time, and wishes to be updated as this plan 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,

Busranur Serin
Planning Officer
Growth, Highways, and Infrastructure

(2) BABERGH DISTRICT COUNCIL

Our ref: Elmsett NP Review R16 Response

Dated: 24 June 2025

From: Planning Policy Team, Babergh & Mid Suffolk District Councils

To: Ann Skippers (Independent Examiner)

cc: Alan Newman (Elmsett Parish Council); Ian Poole (NP Consultant)

By e-mail

Dear Ann,

- 1. Reg 16 consultation on the submission draft Elmsett NP Review**
- 2. Response from Babergh District Council**

This response is made for and on behalf of Robert Hobbs (Head of Strategic Planning - Planning Policy and Infrastructure).

In our Regulation 14 Pre-submission consultation response (May 2024) we stated that we had no specific comments to make on the proposed changes to Chapter 4 (Planning Policy Context), Chapter 7 (Planning Strategy), or to Policy EMST1 (Spatial Strategy) of that iteration of this Plan. That remains the case with this submission draft version.

We also suggested other changes that could be made to the Plan to improve context etc. With reference to the 'Schedule of Proposed Changes ...' document, which accompanies this submission draft Plan, we are pleased to see that these have not only been implemented, but also updated where necessary.

To conclude, this Review Plan reads as a sensible update to the adopted 2019 Plan. Consequently, we have no further comments to make at this time.

Regulation 17e(ii) of the Neighbourhood Planning (General) Regulations 2012 (as amended) also requires us to issue a statement setting out whether or not we consider that the modifications proposed are so significant or substantial as to change the nature of the plan, and to give our reasons why we are of that opinion. We confirm that we do not consider that the modifications made to this Review Plan are significant enough to change its overall nature, and will publish a separate statement to that effect.

Kind regards,

Paul Bryant,

Neighbourhood Planning Officer, Babergh & Mid Suffolk District Councils

T: 01449 724771 / M: 07860 829547/ E: communityplanningberghmidsuffolk.gov.uk



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

(3) ALDHAM PARISH COUNCIL

E from: Jonathan Ralph (Chairman, Aldham Parish Council)
Rec'd: 21 June 2025
Subject: Re Consultation on Elmsett NP Review (Babergh DC) - ends Wed 25 June

Dear ...

Thank you for your notification. Aldham Parish Council has no comments for consideration.

Jonathan Ralph
Chairman, Aldham Parish Council

(4) HISTORIC ENGLAND

E from: Andrew Marsh (Historic Environment Planning Advisor)
Rec'd: 10 June 2025
Subject: Re Consultation on Elmsett NP Review (Babergh DC) - ends Wed 25 June

Dear Sir/Madam,

Re: Consultation on Elmsett NP Review

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

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here:

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

We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed 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,

Andrew Marsh BSc MA MRTPI
Historic Environment Planning Adviser
Development Advice | East of England
Historic England

Historic England
Brooklands | 24 Brooklands Avenue | Cambridge | CB2 8BU
www.historicengland.org.uk



(5) NATURAL ENGLAND

Date: 24 June 2025
Our ref: 512175
Your ref: Elmsett Neighbourhood Plan

Mr Paul Bryant
Babergh & Mid Suffolk District Councils

BY EMAIL ONLY

communityplanning@baberghmidsuffolk.gov.uk



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

Dear Mr Bryant

Elmsett Neighbourhood Plan - Review - Regulation 16 Consultation

Thank you for your consultation on the above dated 09 May 2025.

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](http://magic.defra.gov.uk/)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](http://www.localrecordscentres.org.uk/).

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](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](https://www.planningportal.gov.uk/blog/guidance/natural-environment/)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

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

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.

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](#)

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>

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).
- 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.

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

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

Our ref: AE/2024/129531/02-L01
Your ref: Elmsett NP Reg 16
Date: 16 May 2025

Dear Paul

ELMSETT NP REVIEW (BABERGH DC) - REGULATION 16

ENDEAVOUR HOUSE RUSSELL ROAD, IPSWICH, SUFFOLK, IP1 2BX.

Thank you for consulting us on the Submission Publication for the Elmsett Neighbourhood Plan

We aim to reduce flood risk, while protecting and enhancing the water environment.

Flood Risk

The Draft Neighbourhood Plan includes areas which are located in Flood Zone 2 and 3. In accordance with the National Planning Policy Framework (NPPF), we remind you that the Sequential Test and/or Exception Test for any windfall development to ensure development is directed to the areas of lowest flood risk taking climate change into account.

The application of the Sequential Test should be informed by the Local Planning Authority's Strategic Flood Risk Assessment (SFRA).

Biodiversity Net Gain

We note the Biodiversity Policies within the plan, however without the inclusion of a watercourse metric for windfall developments.

On 12 February 2024, Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This means that unless exempt, Developers must deliver a net gain in biodiversity of at least 10%. Consequently, a development will result in more or better-quality natural habitat than there was before End 2 development.

For any windfall developments where development falls within 10m of a watercourse, a watercourse metric should be applied to the assessment.

Additional Advice

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](#)

The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites and sustainable drainage measures can complement other objectives such as enhancing green spaces

We trust this advice is useful.

Yours sincerely

Mr Jack Saunders
Sustainable Places - Planning Advisor

Direct e-mail: Jack.Saunders@environment-agency.gov.uk
Team email: Planning.Eastanglia@environment-agency.gov.uk
Team phone number: 02030 255475

(7) NATIONAL LANDSCAPE TEAM

E from: Beverly McClean (National Landscape Planning Officer)
Rec'd: 12 May 2025
Subject: Re Consultation on Elmsett NP Review (Babergh DC) - ends Wed 25 June

Dear Paul

Thank you for consulting the National Landscape team on Regulation 16 of the Elmsett Neighbourhood Plan.

As Elmsett lies outside the boundary of the National Landscape and also outside the boundary of the Stour Valley Project Area, the National Landscape team has no comment to make on the Elmsett Neighbourhood Plan.

Kind regards

Beverley McClean



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



Dedham Vale
National
Landscape
& Stour Valley

Beverley McClean

National Landscape Planning Officer

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

Phone: 01394 445220

Mobile: 07849 079285

Pronouns: She/Her

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

www.coastandheaths-NL.org.uk

www.dedhamvale-NL.org.uk

Please consider the environment before printing this email.

(8) SUFFOLK WILDLIFE TRUST

Planning Department
Babergh and Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

Email: communityplanning@baberghmidsuffolk.gov.uk

15th May 2025

RE: Elmsett Neighbourhood Plan | Regulation 16 of the Neighbourhood Planning (General) Regulations (2012).

Thank you for sending Suffolk Wildlife Trust notice of the Regulation 16 Consultation for the Elmsett Neighbourhood Plan. Our comments relate only to Wildlife Conservation, Biodiversity, and Ecology – our charitable remit.

Suffolk Wildlife Trust comments

General Comments

Suffolk Wildlife Trust are pleased to see that Elmsett Park Wood Site of Special Scientific Interest (SSSI), Hitchcock Meadows County Wildlife Site (CWS), Bushey Ley Farm (Arable Fields) CWS, Borley's Wood CWS, and Langham Close Wood CWS are all clearly identified on a map within the draft plan.

References to the intrinsic value placed on nature and biodiversity are made within the plan, including how the younger generation of the village value wildlife, as well as the need to protect sites, habitats, species and features of ecological interest. We can see that the residents of Elmsett value nature and wildlife in their surroundings.

It is disappointing that no priority species are mentioned within the plan; numerous charismatic priority and notable species have been recorded within the parish, including but not limited to; water vole, hedgehog, stag beetle, bullfinch, great crested newt, brown long-eared bat, and man orchid.

Overall, we believe that the plan would be stronger in its support of nature and biodiversity with the inclusion of both a specific Biodiversity Chapter and relating Biodiversity Policy.

Tree Preservation Orders

The draft plan identifies, on Pg. 15, Tree Preservation Orders (TPOs) as a natural environment designation; this is technically incorrect. While trees are an extremely important part of the natural environment, a TPO is considered an amenity designation¹ rather than a measure of the biodiversity value of a tree, or group of trees. We acknowledge TPOs are important in protecting ancient and veteran trees, which are of high importance

¹ <https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas>

for nature. However, the plan could make clear that the presence of TPOs does not necessarily correlate to high biodiversity value and vice versa.

Protection and Enhancement of Biodiversity

The draft plan clearly identifies and maps nationally and locally designated sites, as is required within *Para. 192a* of the *National Planning Policy Framework*² (NPPF); however, our information, provided by Suffolk Biodiversity Information Service³, shows *Hitchcock Meadows CWS* extending south to meet *Elmsett Park Wood SSSI*; this extent is not shown on the map within the draft plan.

The map and text provided could be further improved by also including and referring to additional areas of priority habitat within the parish; these include *Traditional Orchard, Deciduous Woodland, Lowland Meadow, and Good Quality Semi-Improved Grassland*⁴; it is also highly likely that many hedgerows within the parish would meet the criteria for priority habitat.

NPPF Para 192.a also states that plans should “safeguard” such sites and habitats as those discussed above; the draft plan notes that, “*The preparation of the Neighbourhood Plan has taken into account these designations to ensure that the policies and proposals will not have a detrimental impact on them.*” We believe that Objective 7, which is to protect “*green spaces, woodland and countryside*”, could be improved by referring to protected sites and priority habitats specifically.

Policy EMST11 – Development Design Considerations within Section *E.iii* states, that “*Proposals should, as appropriate... taking mitigation measures into account, not affect adversely... [iii] sites, habitats, species and features of ecological interest.*” We believe that this policy should be re-worded to fully consider the mitigation hierarchy, and should include the word impact, so the policy reads “*...taking mitigation measures into account should not adversely impact sites, habitats...*”. For reference, the mitigation hierarchy is as follows: development should first look to avoid impacts to biodiversity assets (including protected sites, priority habitat, and protected species), then look to mitigate and compensate for impacts, as well as enhance the natural environment (as is required within the *NPPF, Para. 187*).

Potential improvements to the draft plan

Suffolk Wildlife Trust believe that an additional policy for biodiversity, or an addition to an existing policy focussed on biodiversity would significantly improve the plan. Such an addition could state specifically that development should enhance biodiversity, minimise impacts on biodiversity, provide net gains for biodiversity, and promote the incorporation of features which support priority or threatened species such as swifts, bats and hedgehogs. This would follow from that outlined in *NPPF Para. 187* and we note that such a policy is commonplace in Neighbourhood Plans across Suffolk.

The draft plan could be further improved, in line with *NPPF Para 192. b*, in its delivery for nature by including policy or wording seeking to, “*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*”

However, we acknowledge that this is not necessarily a requirement that these improvements are incorporated into a final plan.

² Department for Levelling Up, Housing and Communities (2024) The National Planning Policy Framework, December 2024, (Available: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>)

³ <https://www.suffolkbis.org.uk/>

⁴ <https://magic.defra.gov.uk/MagicMap.html>

Conclusion

Overall, with a regard to biodiversity and nature recovery, the draft Elmsett Neighbourhood Plan has a strong base, identifying designated wildlife sites and highlighting the value of wildlife and nature for the community. However, we believe that amendments to the draft plan are required and that additional amendments could improve how the plan promotes nature recovery within the parish.

Suffolk Wildlife Trust would welcome the opportunity to discuss how changes could be made to push the best possible outcomes for biodiversity as a result of this plan.

Yours sincerely,

Alex Jessop

Planning & Advocacy Officer

planning@suffolkwildlifetrust.org

Our ref: NH/25/05552
Your ref: Elmsett NP Review R16 Consultation

‘Elmsett NP Review Consultation’
c/o Planning Policy Team
Babergh District Council
Endeavour House
8 Russell Road, Ipswich, Suffolk, IP1 2BX.

Shamsul HOQUE
Operations (East)
Spatial Planning Team
National Highways
Woodlands
Manton Lane, Bedford
MK41 7LW

Tel: 07850 907600

21 May 2025

Via email to: communityplanning@baberghmidsuffolk.gov.uk

Dear Sir/Madam,

Consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 ~ The Elmsett Neighbourhood Plan Review 2025

National Highways welcomes the opportunity to provide comments on the consultation under Regulation 16, dated 09 May 2025.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority, and street authority for the Strategic Road Network (SRN). Our role includes ensuring the safe and efficient operation of the SRN and acting as a partner in delivering national economic growth.

In relation to the Elmsett Neighbourhood Plan, National Highway's principal interest is in safeguarding the operation of the A14 trunk road, which forms part of the SRN.

We note that the revised Spatial Strategy Policy EMST 1, has been updated to align with the Babergh and Mid Suffolk Joint Local Plan Part 1 (JLP1), which was adopted in November 2023. Furthermore, following the announcement by Babergh District Council in February 2025 regarding the preparation of a new Joint Local Plan with Mid Suffolk, we understand that future development will be focused within the defined Settlement Boundaries.

Upon reviewing the plan, we note that the Neighbourhood Plan area is located at a considerable distance from the A14. As such, we do not anticipate that the draft policies outlined within the plan will have any adverse impact on the operation of the A14. Therefore, National Highways has no further comments on the proposed policies.

Additionally, we have reviewed the supporting document titled, “*Elmsett Neighbourhood Plan Focused Review Basic Conditions Statement*” dated March 2025. We consider that the Neighbourhood Plan does not conflict with the requirements and aspirations of the Joint Local Plan (JLP1) policies. In relation to the Focus consultation on General Conformity with Basic Conditions, National Highways have no further comments to provide.

At this stage, we do no additional comments to offer.

Yours sincerely,

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

(10) AVISON YOUNG obo National Gas Transmission



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F: +44 (0)191 269 0076

avisonyoung.co.uk

Our Ref: MV/ 15B901605

13 June 2025

Babergh District Council

communityplanning@baberghmidsuffolk.gov.uk

via email only

Dear Sir / Madam

Elmsett Neighbourhood Plan - Regulation 16 Consultation

May – June 2025

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

(11) ELMSETT PARISH COUNCIL

Elmsett Neighbourhood Plan Review

Parish Council response to Regulation 16 consultation comments

June 2025

Consultee & summary comment	Parish Council response
Suffolk County Council The County Council commented at Pre-Submission consultation stage and have no further comments	Nothing further to add
Babergh District Council The District Council commented at Pre-Submission consultation stage have no further comments to make at this time.	Nothing further to add
Aldham Parish Council The Parish Council were consulted but did not comment at Pre-Submission consultation stage. They make no comment.	Nothing further to add
Historic England Historic England commented at Pre-Submission consultation stage and do not consider it necessary to provide detailed comments to make at this time.	Nothing further to add
Natural England Historic England commented at Pre-Submission consultation stage and do not have any specific comments on this draft neighbourhood plan.	Nothing further to add
Environment Agency The Environment Agency were consulted but did not comment at Pre-Submission consultation stage. Reference is made to the need for any windfall developments where development falls within 10m of a watercourse, a watercourse metric should be applied to the assessment.	The Parish Council considers that this is a matter for the validation of planning applications rather than planning policies min a neighbourhood plan.
National Landscape Team The National Landscape Team were consulted but did not comment at Pre-Submission consultation stage. They make no comment.	Nothing further to add

Consultee & summary comment	Parish Council response
<p>Suffolk Wildlife Trust Suffolk Wildlife Trust were consulted but did not comment at Pre-Submission consultation stage.</p> <p>The Trust is disappointed that no priority species are mentioned within the plan; numerous charismatic priority and notable species have been recorded within the parish, including but not limited to; water vole, hedgehog, stag beetle, bullfinch, great crested newt, brown long-eared bat, and man orchid. They believe that the plan would be stronger in its support of nature and biodiversity with the inclusion of both a specific Biodiversity Chapter and relating Biodiversity Policy.</p> <p>The Trust notes that tree preservation orders considered an amenity designation rather than a measure of the biodiversity value and that plan could make clear that the presence of TPOs does not necessarily correlate to high biodiversity value and vice versa.</p> <p>The Trust notes that Hitchcock Meadows County Wildlife Site is not identified correctly on Map 4 in the Plan.</p> <p>Reference is also made to including and referring to additional areas of priority habitat within the parish.</p> <p>The Trust suggests that Objective 7, which is to protect “<i>green spaces, woodland and countryside</i>”, could be improved by referring to protected sites and priority habitats specifically.</p> <p>Policy EMST11 – The Trust suggests that part iii should be re-worded to fully consider the mitigation hierarchy and suggest additional wording.</p> <p>The Trust also suggests that an additional policy is required to focus on biodiversity, and a further additional policy promoting the conservation of priority habitats.</p>	<p>The Plan represents a focused review of Policy EMST 1 while the factual content of the remainder of the Plan has been updated. Joint Local Plan Policy LP16 ‘Biodiversity & Geodiversity’ addresses a number of biodiversity matters including making reference to priority habitats.</p> <p>Nothing further to add</p> <p>Map 4 can be amended at post-examination stage</p> <p>This is not considered necessary</p> <p>This is not considered necessary</p> <p>This is not considered necessary</p> <p>The Parish Council has taken a focused review of the Plan and does not consider it necessary to amend the made Plan further to include additional policies</p>

Consultee & summary comment	Parish Council response
<p>National Highways National Highways commented at Pre-Submission consultation stage and do not have any further comments on the proposed policies.</p>	<p>Nothing further to add</p>
<p>Avison Young obo National Gas Transmission National Gas Transmission were consulted but did not comment at Pre-Submission consultation stage. They have identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p>	<p>Nothing further to add</p>