

Reg 16 Submission consultation responses

In February 2023, Great Waldingfield Parish Council (the ‘qualifying body’) submitted their Neighbourhood Development Plan to Babergh District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Monday 19 April 2023 until Friday 2 June 2023.

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

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Babergh District Council
(3)	Natural England
(4)	Historic England
(5)	Anglian Water
(6)	Water Management Alliance
(7)	National Highways
(8)	Avison Young, obo National Gas Transmission
(9)	Avison Young, obo National Grid Electricity Transmission
(10)	Defence Infrastructure Organisation, obo the MOD
(11)	Marine Management Organisation
(12)	Lanpro Services, obo Chilton Grain Ltd
(13)	Mr Livall

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(1) SUFFOLK COUNTY COUNCIL

Date: 26 May 2023
Enquiries to: Georgia Teague
Tel:
Email:
neighbourhoodplanning@suffolk.gov.uk



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

Dear Mr Bryant,

Submission Consultation version of the Great Waldingfield Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Great Waldingfield Neighbourhood Plan.

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

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

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

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

Adaptable homes and an ageing population

During the Pre-Submission consultation, SCC raised support for the brief mention of M4(2) housing, and recommend that this be incorporated into policy.

Building homes that are accessible and adaptable means that these homes are able to be changed to meet the evolving needs of their occupants. For example, if their mobility worsens with age a stairlift can be securely and safely fitted due to sufficient space requirements, as these homes are built to a standard that can meet the needs of a lifetime. While it is understandable that each housing type may not be suitably accommodated on every site, efforts should be made, where possible, to ensure that each site contains a mixture of housing types. This can help prevent segregation by age group and possible resulting isolation.

The Consultation Statement indicated in response that: “Requiring homes to meet a Building Regulations standard in a planning policy is not appropriate and the County Council’s suggestion would be contrary to the Written Ministerial Statement of 25 March 2015 (HCWS488).”

It is believed that the parish has misunderstood the intentions of the County Council – we are not proposing that the plan should set additional technical standards, as correctly stated in the Consultation Statement this would be against the Ministerial Statement 2015.

SCC was proposing that the plan should show specific support for developments that include homes that are built to be adaptable and accessible, in line with M4(2) standards, and that these styles of homes would be welcomed in order to meet the needs of an ageing population without restricting the needs of younger occupants.

The graph in section 2.12 of the plan displays the demographics of the parish and clearly shows that the 60-79 and 80+ percentages are both higher than the Babergh averages for the same age ranges. This is reiterated in paragraph 2.13, indicating the ageing population.

Following guidance from footnote 46 in the NPPF “Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.”

Objective H1 states that “New housing meets a proven need including the long-term needs of all residents.”

As clearly displayed in the plan, there is an ageing population, and their needs should be considered. Having homes that are adaptable and accessible, built to M4(2) standards, means that the homes can be adapted to meet the needs of a lifetime. This will ensure the plan can meet Objective H1 by meeting the needs of the community.

Therefore, the following wording is recommended for Policy GWD2 Housing Development:

“Support will be given for smaller 2 and 3 bedroomed homes that are adaptable (meaning built to optional M4(2) standards), in order to meet the needs of the ageing population, without excluding the needs of the younger occupants and families.”

This amendment to the plan would, therefore, help the plan to meet the needs of an ageing population of the parish, as the plan has already indicated.

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

Yours sincerely,

Georgia Teague
Planning Officer
Growth, Highways, and Infrastructure

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(2) BABERGH DISTRICT COUNCIL

Our ref: Gt Waldingfield NP R16

Date: 2 June 2023

FAO: Ann Skippers (Independent Examiner)

cc: Clare Kiely (Chair, NP Steering Group) & Ian Poole (Places4People)

Dear Ann, (All)

Great Waldingfield Neighbourhood Plan 2018 – 2037

Reg 16 Submission draft consultation - Additional comments from Babergh District Council

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

The District Council welcomes the changes that have been made to the Great Waldingfield Neighbourhood Plan (the Plan) in response to our Regulation 14 response. On a minor point, we note that some of our suggestions are acknowledged in the Consultation Statement but do not appear to have been fully implemented in this latest version of the Plan, i.e., the second sentence in para 1.4 (see Consultation Statement page 59), and the misspelling of Domesday Book in para 2.3. Also, our comment relating to Policy GWD5 appears to have been omitted in error. For the record, we had said that: *'The last sentence [in GWD5] refers to the 'Assessment of Views'. If this means the 'Landscape Character Assessment and Important Views Appendix, we encourage you to use the correct document title here and throughout to avoid misunderstanding.'*

We do have some other observations and set these out below. None seek to significantly amend or alter the Plan. Where appropriate, and at your discretion, these could all be dealt with by way of minor modifications.

Policy GWD3

For clarity, and as per our Regulation 14 recommendation, the first sentence in criterion iii should read: *'is offered, in the first instance, to people with a demonstrated local connection **to the parish**, as defined by the Babergh Choice Based Lettings Scheme.'*

Chapter 7 – Natural Environment

Our Biodiversity Project Manager was unable to comment on the pre-submission draft Plan but has provided some thoughts on this latest version. From separate correspondence with the parish council he is also aware of local concerns about the threat to wildlife and of various calls to action. In summary, his thoughts can be summarised as follows:

- Welcomes the mapping of the Wildlife Corridors, and mention of the two County Wildlife Sites
- Suggests that more could have been done to ensure that the existing evidence base is visible. What there is, is referenced in the Evidence Base Master Summary, but not all of the documents have accessible links.



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

- To pick up local concerns, recommends that a more thorough biodiversity audit is carried out, mapping in greater detail the relevant features (corridors, open spaces etc.) and recording the condition of them. The audit would then allow relevant stakeholders to focus their efforts on what to do and where. It would also, perhaps, help inform a future iteration of GWD7 so that it could recommend a more effective range of actions to both secure and enhance local biodiversity.

We also recognise that the final suggestion is only likely to come forward as a follow-on project from this Plan. If this is something that the parish council wish to peruse, and if we can assist in any way, we can have a separate discussion about that.

Para 8.4 and Policy GWD9

In our Regulation 14 response we said that three of the proposed Buildings of Local Significance (No's 1, 5, and 15) appear to have been extended or otherwise modified in a manner that would make unsuitable candidates for non-designated heritage asset (NdHA) status. For now, we simply note the Groups response (page 83 of the Consultation Statement) and reiterate our offer to have a further discussion about these and the three other potential candidates if/when the formal request referred to in paragraph 8.4 does come forward.

Policy GWD14

To ensure consistency in wording used in similar policies in other neighbourhood plan, and as set out in our Regulation 14 response, insert the words '*current and future*' before '*needs of users*' in the paragraph that follows criterion b.

Policy GWD15

We note that 'No.14: Land at former airfield' is a new addition to the list of proposed Local Green Spaces. Based on the information set out in the Local Green Space Assessment we have no objection to this addition.

* * * * *

We trust that the above are helpful.

Yours sincerely,

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

Caileigh Gorzelak
Strategic Planning Policy Officer
Babergh & Mid Suffolk District Councils
T: 01449 724595

(3) NATURAL ENGLAND

Date: 30 May 2023
Our ref: 430356
Your ref: Great Waldingfield Neighbourhood Plan



Mr Paul Bryant
Babergh & Mid Suffolk District Councils

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

communityplanning@baberghmidsuffolk.gov.uk

T 0300 060 3900

Dear Mr Bryant

Great Waldingfield Neighbourhood Plan – Regulation 16 Consultation

Thank you for your consultation on the above dated 18 April 2023.

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 the Great Waldingfield Neighbourhood Plan.

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

Yours sincerely

Sally Wintle
Consultations Team

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(4) HISTORIC ENGLAND

E from: Historic England

Rec'd: 1 June 2023

Subject: Historic England Response Gt Waldingfield R16 Neighbourhood Plan Consultation

Dear Local Plan Team

Ref: Gt Waldingfield Regulation 16 Neighbourhood Plan Consultation

Thank you for inviting Historic England to comment on the above consultation. We welcome the production of this neighbourhood plan in principle but, owing to staff vacancies, we do not currently have capacity to provide detailed comments.

We would refer you to any detailed comments we may have made at earlier stages of the plan's production including Regulation 14 and where it was required, SEA screening/scoping and draft report stages.

Our detailed advice on successfully incorporating historic environment considerations into neighbourhood plan, alongside some useful case studies, can be found here:

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

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

Please do contact me, either via email or the number above, if you have any specific queries arising following this stage, and we will endeavour to assist at that time.

Yours sincerely,

Will Fletcher
Development Advice: Team Leader



Dr Will Fletcher FSA
Development Advice Team Leader: East Region
Tel: 01223 582710
Mob: 07836 239089

Historic England | Brooklands | 24 Brooklands Avenue | Cambridge | CB2 8BU

www.historicengland.org.uk

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.

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(5) ANGLIA WATER

E from: Tessa Saunders | Spatial Planning Advisor

Rec'd: 31 May 2023

Subject: Consultation on R16 Gt Waldingfield N'hood Plan (Babergh DC)

Dear Community Planning Team,

Thank you for inviting comments on the Great Waldingfield Neighbourhood Plan Reg. 16 submission consultation. Anglian Water is the statutory water and sewerage undertaker for the neighbourhood plan area. The following comments are in support of the neighbourhood plan in the context of our role and purpose:

- Anglian Water is supportive of policies (GWD10 Design Considerations and GWD11 Flooding and Sustainable Drainage) that seek to manage surface water flood risk following the drainage hierarchy and promoting the use of sustainable drainage systems as appropriate, which help to provide multi-functional benefits for biodiversity, amenity, and water efficiency, whilst helping to minimise the impact of surface water run-off on our water recycling network.
- We welcome reference to permitted development rights and operational requirements of infrastructure providers in the supporting text (para 10.10) for Policy GWD15 Local Green Spaces, as there are Anglian Water mains water and sewer pipes within some of the local green spaces identified. This explanation helpfully explains that any works required to maintain/repair our assets are unaffected by the LGS designation.

I would be grateful if receipt of our representation could be acknowledged.

Kind regards,



Tessa Saunders MRTPI
Spatial Planning Advisor

Web: www.anglianwater.co.uk

Anglian Water Services Limited

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

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(6) WATER MANAGEMENT ALLIANCE

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

Rec'd: 19 April 2023

Subject: Re: Consultation: Reg 16 Gt Waldingfield N'hood Plan (Babergh DC)

Good morning

Thank you for your consultation on the R16 Gt Waldingfield Neighborhood Plan. Having screened the application, the site in question lies outside the Internal Drainage District of the East Suffolk Water Management Board as well as the Board's wider watershed catchment, therefore the Board has no comments to make.

Yours sincerely,



Rachael Yeowell

Sustainable Development Officer

Water Management Alliance

T: 01553 819630 | Planning@wlma.org.uk

Registered office: Pierpoint House, Horsley's Fields, King's Lynn, Norfolk, PE30 5DD

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

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

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Our ref: Gt Waldingfield N'hood Plan (REG 16)
our ref: Gt Waldingfield NP Reg 16 Consultation

'Gt Waldingfield NP Consultation'
c/o Spatial Planning Policy Team
Babergh District Council
Endeavour House
8 Russell Rd
Ipswich, Suffolk, IP1 2BX

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

Via email to: communityplanning@babermidsuffolk.gov.uk

16 May 2023

Dear Sir/Madam,

**CONSULTATION UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING
(GENERAL) REGULATIONS 2012 (AS AMENDED) –
GREAT WALDINGFIELD NEIGHBOURHOOD PLAN 2018 - 2037**

Thank you for your correspondence, received on 18 April 2023, notifying National Highways of the consultation under Regulation 16.

National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding the Great Waldingfield Neighbourhood Plan, we have responsibility for the trunk roads A12 and A14.

National Highways sent a comment previously, in response to the Great Waldingfield Neighbourhood Plan Regulation 14 Consultation Response.

With this current consultation under Regulation 16, we have reviewed different policy details within the Great Waldingfield Neighbourhood Plan 2018-2037. The area and location that are covered by this Neighbourhood Plan are remote from the SRN. Consequently, these draft policies set out are unlikely to have an impact on the operation of the trunk road and National Highways offer No Comment.

We do not have any more comments on this.

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

Yours faithfully,

Shamsul Hoque Assistant Spatial Planner

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(8) AVISON YOUNG, obo NATIONAL GAS TRANSMISSION

**AVISON
YOUNG**

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Orchard Street
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avisonyoung.co.uk

Our Ref: MV/ 15B901605



25 May 2023

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

Dear Sir / Madam

**Great Waldingfield Neighbourhood Plan - Regulation 16 Consultation
April - June 2023
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 South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Kam Liddar, Asset Protection Lead

kam.liddar@nationalgas.com

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

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

Yours faithfully,

Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

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

Gas assets

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

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

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

How to contact National Gas Transmission

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

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

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(9) AVISON YOUNG, obo NATIONAL GRID ELECTRICITY TRANSMISSION



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F: +44 (0)191 269 0076

avisonyoung.co.uk

Our Ref: MV/ 15B901605



25 May 2023

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

Dear Sir / Madam

**Great Waldingfield Neighbourhood Plan - Regulation 16 Consultation
April - June 2023
Representations on behalf of National Grid Electricity Transmission**

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

About National Grid Electricity Transmission

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

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

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

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

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

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

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

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

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

Distribution Networks

Information regarding the electricity distribution network is available at the website below:
www.energynetworks.org.uk

Further Advice

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

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

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

Ellie Laycock, Development Liaison Officer

box.landandacquisitions@nationalgrid.com

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

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

Yours faithfully,

Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

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

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

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

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

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

How to contact NGET

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

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

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(10) DEFENCE INFRASTRUCTURE ORGANISATION, obo the MOD



Defence
Infrastructure
Organisation

Christopher Waldron

Ministry of Defence

Safeguarding Department

DIO Head Office

St George's House

DMS Whittington

Lichfield

Staffordshire WS14 9PY

Your reference: Great Waldingfield
Neighbourhood Plan 2018 - 2037 Reg 16

Mobile: +44 (0) 7800 505824

Our reference: 10055312_Rev1

E-mail: [DIO-Safeguarding-
Statutory@mod.gov.uk](mailto:DIO-Safeguarding-Statutory@mod.gov.uk)

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

2nd June 2023

Dear Paul

It is understood that Babergh District Council are undertaking a consultation regarding their Great Waldingfield Neighbourhood Plan 2018 - 2037 under Regulation 16. This document will guide the future development of the parish.

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

The MOD may be involved in the planning system both as a statutory and non-statutory consultee with statutory involvement stemming from consultation occurring as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

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

The MOD have an interest within the area covered by the Great Waldingfield Neighbourhood Plan 2018 - 2037 consultation as it contains areas that are washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites. Wattisham Station, located to the North-East, benefits from safeguarding zones drawn to preserve the airspace above and surrounding the aerodrome to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. New development may have detrimental impacts depending on site location relative to safeguarded sites and assets. Additionally, Wattisham Station is washed over by a statutory birdstrike safeguarding zone, designed for birdstrike risk to be identified and mitigated.

Within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, such as green and/or brown roofs/roof gardens on flat roof buildings, as well as the creation of new waterbodies. Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, and associated ponds and wetlands provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.

The MOD should be consulted within the Great Waldingfield Neighbourhood Plan 2018 - 2037 of any potential development within the statutory technical safeguarding zones that surround Wattisham Station which consists of structures or buildings exceeding statutory safeguarding technical criteria, or any development in the statutory birdstrike safeguarding zone surrounding Wattisham Station which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

I trust this clearly explains our position on this update

Yours sincerely

C Waldron

Chris Waldron
DIO Assistant Safeguarding Manager

(11) MARINE MANAGEMENT ORGANISATION

E from: Consultations.MMO@marinemanagement.org.uk

Rec'd: 1 June 2023

Subject: Notice of consultation - R16 Gt Waldingfield N'hood Plan (Babergh DC)

Dear the Babergh and Mid Suffolk planning team,

I am writing to confirm whether you have received our MMO standard response for this consultation, a copy of the standard response is attached.

We advise that you consider any relevant policies within the South East Marine Plan documents in regard to areas within the plan that may impact the marine environment.

When reviewing the South East Marine Plan to inform decisions that may affect the marine environment, please take a whole-plan approach by considering all marine plan policies together, rather than in isolation.

Many thanks for the opportunity to comment,

Marie Canny (She/Her) | Marine Planner (South East) | Marine Management Organisation

📍 Nobel House | 17 Smith Square | London | SW1P 3JR

📧 marie.canny@marinemanagement.org.uk | 📞 07917 594 331

* * * * *

Marine Management Organisation Functions

The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

Marine Planning and Local Plan development

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the [Coastal Concordat](#). This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.

Under Section 58(3) of [Marine and Coastal Access Act \(MCAA\) 2009](#) all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK [Marine Policy Statement](#). This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local

planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service: soundness self-assessment checklist](#). We have also produced a [guidance note](#) aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our [gov.uk page](#).

See [this map on our website to locate](#) the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our [Explore Marine Plans](#) online digital service.

The adoption of the [North East](#), [North West](#), [South East](#), and [South West Marine Plans](#) in 2021 follows the adoption of the [East Marine Plans](#) in 2014 and the [South Marine Plans](#) in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.

Marine Licensing and consultation requests below MHWS

Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a [marine licence](#) in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. We have produced a [guidance note](#) (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: marine.consents@marinemanagement.org.uk.

Consultation requests for development above MHWS

If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:

- The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the [Planning and Compulsory Purchase Act 2004](#). Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.
- It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.
- If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.

Minerals and Waste Local Plans and Local Aggregate Assessments

If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:

- The [Marine Policy Statement \(MPS\)](#), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry.
- The [National Planning Policy Framework \(NPPF\)](#), which sets out policies for national (England) construction mineral supply.
- [The minerals planning practice guidance](#) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- [The national and regional guidelines for aggregates provision in England 2005-2020](#) predict likely aggregate demand over this period, including marine supply.

The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response, please email us at consultations@marinemanagement.org.uk or telephone us on 0208 0265 325.

[Ends]

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(12) LANPRO SERVICES, obo Chilton Grain Ltd

Section One: Respondents Details

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

Part A: Respondent	
Title/ Name:	Benjamin Borthwick
Job Title (if applicable):	Associate Director
Organisation / Company (if applicable):	Lanpro Services
Address:	8 Devonshire Square London
Postcode:	EC2M 4YJ
Tel No:	07795 204287
E-mail:	ben.borthwick@lanproservices.co.uk

Part B: Agents - Please complete details of the client / company you represent	
Client/ Company Name:	Chilton Grain Limited
Address:	C/O Agent
Postcode:	
Tel No:	
E-mail:	

Section Two: Your comment(s)

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

Paragraph No.		Policy No.	GWD1
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications	✓	Have Comments	✓

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

Please refer to letter of representations.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please refer to letter of representations.

(Continue on separate sheet if necessary)

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

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

Paragraph No.		Policy No.	GWD15
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

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

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

Please refer to letter of representations.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

N/A

(Continue on separate sheet if necessary)

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

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

Paragraph No.		Policy No.	GWD17
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications	✓	Have Comments	✓

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

Please refer to letter of representations.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please refer to letter of representations.

(Continue on separate sheet if necessary)

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

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

Paragraph No.		Policy No.	GWD18
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications	✓	Have Comments	✓

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

Please refer to letter of representations.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please refer to letter of representations.

(Continue on separate sheet if necessary)

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

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

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

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

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

N/A

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the Great Waldingfield NP by Babergh District Council	<input checked="" type="checkbox"/>

Signed: 	Dated: 2 June 2023
----------------------------------------------------------------------------------------------------	---------------------------

Great Waldingfield NP Consultation

c/o Spatial Planning Policy Team
Babergh District Council
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

2 June 2023

Lanpro Project Number – 4120/P

By email: communityplanning@babermidsuffolk.gov.uk

Dear Sir / Madam,

Great Waldingfield Neighbourhood Plan 2018 - 2037 Response on behalf of Chilton Grain Limited

Lanpro Services Limited ('Lanpro') has been instructed by Chilton Grain Limited ('client' or 'landowner' depending on context) in relation to their interests at Chilton Airfield, Tentree Road, Great Waldingfield, Suffolk, CO10 0SD (the 'Site' or 'landholding'). Part of the landholding is located within the designated Great Waldingfield Neighbourhood Plan Area.

The north-western part of our client's landholding, which falls within the adjacent Acton Parish Neighbourhood Plan Area, is the subject of an application for full planning permission (Ref: DC/23/02191) for the erection of a commercial unit subdivided into 5No individual units for Class E(g), B2 and B8 use, which is currently under consideration by Babergh District Council.

In the context of the above, our client has instructed Lanpro to submit a response to the Great Waldingfield Neighbourhood Plan Submission (Regulation 16) Consultation. This response follows earlier representations to the Pre-Submission Draft Neighbourhood Plan Consultation submitted on behalf of our client in October 2022, a copy of which is included at **Appendix 1** to this letter.

Submission Draft Neighbourhood Plan

General

Our client supports the principle of the Neighbourhood Plan and recognises the significant efforts which it takes to prepare such a document, specifically from the Parish Council, local residents and stakeholders.

Draft Policy GWD1 – Spatial Strategy

Our client supports the principle of draft Policy GWD1 and accepts that the focus for new development will be within the defined Settlement Boundaries. However, and consistent with the support afforded by Draft Policies GWD17 and GWD18, our client considers that the acceptability

of development at the employment sites identified in the Neighbourhood Plan, which includes its landholding, should be positively referenced as an exception in the second part of the policy. Specifically, it considers it appropriate for an additional part of the policy to be added to explicitly state that additional employment development on land identified as employment sites in the Neighbourhood Plan is appropriate in principle, subject to adherence to the other criteria identified (i.e., not detrimentally impacting on heritage and landscape designations, or undermining important gaps between settlements).

It is considered that a failure to include this additional policy consideration would likely result in inconsistency between the policies, and therefore that the Neighbourhood Plan would potentially fail to meet the basic conditions, as set out at paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.

To this aim, we suggest revisions to draft Policy GWD1 wording as follows:

Policy GWD1 – Spatial Strategy

The Neighbourhood Area will accommodate development commensurate with the policies of the adopted Local Plan.

The focus for new development will be within the Settlement Boundaries, as defined 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 and district level policies and, additionally, where they:

- i. would not have a detrimental impact on heritage and landscape designations; and*
- ii. would not undermine the important gaps between settlements as identified on the Policies Map.*

The principle of development for employment purposes on land identified as an employment site in the Neighbourhood Plan is accepted, subject to compliance with the above criteria i. and ii.

[suggested additional text is shown above in red]

Policy GWD15 – Local Green Spaces

The Neighbourhood Plan seeks to identify green areas, and draft Policy GWD15 explicitly designates 14 Local Green Spaces. Although it is recognised as appropriate for a Neighbourhood Plan to identify and protect Local Green Spaces, such designations are required to be consistent with sustainable development, together with complimenting investment in, inter alia, jobs.

The National Planning Policy Framework ('NPPF') (July 2021) includes the concept of a Local Green Space designation at paragraph 101 as a discretionary designation in Local and Neighbourhood Plans. NPPF paragraph 102 requires that the designation should only be used where the land is not extensive, is local in character and reasonably close to the community; and, where it is

demonstrably special, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.

Policy GWD15 Site No 14 'Land at Former Airfield' is within our client's and Suffolk County Council's ownership. Notwithstanding that the Neighbourhood Plan document does not itself include any maps setting out the locations and /or the boundaries of the 14 listed Local Green Spaces, according to the Local Green Assessment (February 2023) which forms part of the Neighbourhood Plan evidence base, Area 2 falls within our client's landownership.

Whilst this area of land does not wholly meet the criteria identified at NPPF Paragraph 102, specifically that it is sufficiently special and of particular significance to the local community, Chilton Grain is willing to support the proposed designation of the land as a Local Green Space, especially given the policy support afforded to the landholding for employment purposes. This is notwithstanding the implications of the designation (i.e., policies for managing development being consistent with those for Green Belts under paragraph 103 of the NPPF).

Draft Policy GWD17 – Employment Sites

Our client welcomes the principle of the proposed allocation of its landholding as an employment site as part of the Neighbourhood Plan and considers that the landholding has the ability to accommodate additional development to the benefit of the village, Parish and wider District more generally, although it is recognised that any proposals would need to be sensitively designed and delivered.

On balance, our client broadly accepts the criteria against which proposals for development of existing employment and other business uses are to be assessed, although it considers that a proportionate approach should reasonably be taken having regard to the specific nature and extent of the proposed development.

Although it is not the landowner's current intention to seek non-employment uses at the site, it queries whether the criteria set out in the second part of Draft Policy GWD17 are entirely consistent with the NPPF, particularly criterion d) of NPPF paragraph 82.

Our client considers that a failure to provide for some flexibility to respond to needs not anticipated, such as changes in working practices arising from the recent Covid-19 Pandemic, and to ensure a rapid response to changes in economic circumstances, should be afforded. Otherwise, the Inspector may find that Draft Policy GWD17 is not consistent with national policy.

To this aim, we suggest revisions to draft Policy GWD17 wording as follows:

Policy GWD17 – Employment Sites

The retention and development of existing employment and other business uses, including those identified on the Policies Map, will be supported providing such proposals do not have a detrimental impact on the local landscape character, heritage assets, residential (including noise, light and air pollution, loss of privacy and overlooking), traffic generation, identified important views and identified important gaps in the built-up area.

Proposals for non-employment or business uses that are expected to have an adverse impact on employment generation will only be permitted where one or more of the following criteria has been met:

- a) evidence can be provided that genuine attempts have been made to sell/let the site/premises in its current use, and that it can be demonstrated that no suitable and viable alternative employment / business uses can be found or are likely to be found in the foreseeable future;*
- b) the existing use has created over-riding environmental problems (e.g. noise, odours or traffic) and permitting an alternative use would be a substantial environmental benefit that would outweigh the loss of an employment / business site;*
- c) an alternative use or mix of uses would assist in regeneration and offer greater benefits to the community in meeting local business and employment needs;*
- d) it is for an employment related support facility, such as employment training/education or workplace crèche;*
- e) an alternative use or mix of uses would provide other sustainability benefits that would outweigh the loss of an employment / business site.*

Proposals that allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances will be supported in principle, subject to compliance with the above criteria a) to e).

[suggested additional text is shown above in red]

Draft Policy GWD18 – New Business and Employment

Our client welcomes and wholly supports the principle of Draft Policy GDW18, and specifically the explicit support afforded by criterion a) of the second part of the policy which relates to land designated in the development plan for business use. Our client also accepts the policy aspiration whereby additional business development should be sited, inter alia, on areas of previously developed land.

However, and given the relatively limited amount of built form on our client's landholding, we suggest that the policy wording is amended to allow for some flexibility to deliver additional development on greenfield land, subject to ensuring that any resultant impacts would be within acceptable parameters.

We therefore suggest revisions to draft Policy GWD18 wording as follows:

Policy GWD18 – New Business and Employment

Proposals for new business development will be supported where sites are located within the Settlement Boundaries identified on the Policies Map where they would not have an unacceptable impact on residential amenity, heritage assets and the highways network.

Outside the Settlement Boundaries, proposals will be supported where:

- a) it is located on land designated in the development plan for business use; or
b) it relates to small scale leisure or tourism activities or other forms of commercial I
employment related development or agriculture related development of a scale and
nature appropriate to a countryside location can be satisfactorily demonstrated; or
c) it is located on other appropriate sites outside the Settlement Boundaries in accordance
with the requirements of criteria i) and ii) of Policy GWD 1.*

*Where possible, business developments should be sited in existing buildings or on areas of
previously developed land and be of a size and scale that does not adversely affect the
character, highways, infrastructure, residential amenity, environment and landscape
character as identified in the Neighbourhood Plan Landscape Appraisal.*

[suggested additional text is shown above in red]

We trust that this response is helpful in the context of the emerging Neighbourhood Plan. We would be grateful for confirmation that the response has been received, and that the comments have been duly made. We wish to be kept updated regarding consideration of the representations, and the progress of the Neighbourhood Plan more generally.

Yours faithfully,



Ben Borthwick
Associate Director of Planning

For and on behalf of Chilton Grain Limited.

Appendix 1: Representations to the Great Waldingford Pre-Submission Draft Neighbourhood Plan Consultation, submitted on behalf of Chilton Grain Limited.

Great Waldingfield Parish Council

Great Waldingfield Village Hall,
Lavenham Road,
Great Waldingfield,
Sudbury,
Suffolk,
CO10 0SE.

26th October 2022

Lanpro Project Number – 4120/P

By email (gtwaldingfieldnp@aol.com)

Dear Sir / Madam,

Great Waldingfield Neighbourhood Plan Response on behalf of Chilton Grain Limited

Lanpro Services Limited ('Lanpro') has been instructed by Chilton Grain Limited ('client' or 'landowner') in relation to their interests at Chilton Airfield, Tentree Road, Great Waldingfield, Suffolk, CO10 0SD (the 'Site' or 'landholding'). Part of the Site is located within the designated Great Waldingfield Neighbourhood Plan Area. Our client has instructed Lanpro to submit a response to the 'Possible Local Green Space Designation – Great Waldingfield Airfield' Consultation.

In addition, and to assist the Parish Council with the ongoing preparation of the Neighbourhood Plan, we also provide comment to the relevant parts of the 'Pre-Submission Draft Plan' as far as it relates to the Site. It is recognised that the deadline for the consultation period has ended. However, we would be very grateful if the comments could be considered as part of the evolution of the Neighbourhood Plan.

Possible Local Green Space Designation

It is noted that the Neighbourhood Plan is to identify a number of green areas, and that some are to be explicitly designated as 'Local Green Spaces.' It is recognised that 'Local Green Spaces' can be identified and protected by a Neighbourhood Plan. Although, such designations should be consistent with sustainable development, together with complimenting investment in, inter alia, jobs¹.

Paragraph 102 of the National Planning Policy Framework ('NPPF') (July 2021) sets out a number of situations where a 'Local Green Space' designation should be used. These are:

- In reasonably close proximity to the community where it serves;
- Demonstrably special to the local community and holds a particular significance; and
- Local in character and is not an extensive tract of land.

¹ Paragraph 101 of the National Planning Policy Framework (July 2021).

'Area 2' is within our client's landownership. Whilst it does not accept that the land wholly meets the criteria identified in NPPF Paragraph 102, specifically that it is sufficiently special and of particular significance to the local community, Chilton Grain is willing to support the proposed designation of the land as a Local Green Space, especially given the policy support afforded to the landholding for employment purposes. This is in spite of the implications of the designation (i.e. policies for managing development being consistent with those for Green Belts²).

However, our client requests that the boundary of the designation is drawn tightly to the edge of the existing tree belt. The landowner can provide accurate topographical data to assist with this if welcomed. In addition, the landowner wishes to clarify that the designation infers no additional rights of access. The landowner would be grateful for the Parish Council's confirmation in relation to this matter.

Pre-Submission Draft Neighbourhood Plan

General

Our client supports the principle of the Neighbourhood Plan. It recognises the significant efforts which it takes to prepare a Neighbourhood Plan, specifically from the Parish Council and local residents. It therefore intends to reiterate its support at the Regulation 16 stage, and is willing to assist the Parish Council in other ways if welcomed.

Draft Policy GWD1 – Spatial Strategy

Our client supports the principle of Draft Policy GWD1. It accepts that within the defined Settlement Boundaries should be the focus for new development, principally new homes. However, and consistent with the support afforded by Draft Policies GWD17 and GWD18, it considers that development of the employment sites identified in the Neighbourhood Plan, which includes its landholding, should be positively referenced as an exception in the second part of the policy. Specifically, it considers it appropriate for an additional bullet point to be provided which explicitly states that additional employment development on land identified as employment sites in the Neighbourhood Plan is appropriate, subject to the other criteria identified (i.e. not detrimentally impacting on heritage and landscape designations, or undermining important gaps between settlements). It considers that failure to do so may result in inconsistency between the policies, and potentially not meeting the basic conditions.

Draft Policy GWD17 – Employment Sites

Our client welcomes the principle of the proposed allocation of its landholding as an employment site. It considers that the landholding has the ability to accommodate additional development to the benefit of the village, Parish and District more generally, although recognises that any proposals need to be sensitively designed and delivered.

It accepts on balance the criteria against which proposals are to be assessed, although considers that a proportionate approach should be taken having regard to the specific nature and extent of the proposed development.

² Paragraph 103 of the National Planning Policy Framework (NPPF) (July 2021).

Whilst it is not the landowners current intention to seek non-employment uses at the Site, it queries whether the criteria set out in the second part of Draft Policy GWD17 is consistent with the NPPF, specifically criterion d) of NPPF Paragraph 82. It considers that failure to allow some flexibility to respond to needs not anticipated, such as changes in working practices arising from the recent Covid-19 Pandemic, and to ensure a rapid response to changes in economic circumstances, should be afforded. Otherwise, the Inspector could find that Draft Policy GWD17 is not consistent with national policy.

Draft Policy GWD18 – New Business and Employment

Our client welcomes and wholly supports the principle of Draft Policy GDW18, specifically the explicit support afforded by criteria a) of the second part of the policy to land designated in the development plan for business use. It accepts the aspiration that additional development should be sited, inter alia, on areas of previously developed land. However, and given the relatively limited amount of built form on its landholding, it requests some flexibility to deliver additional development on greenfield land subject to ensuring that any impacts of doing so are within acceptable parameters.

We trust that this response is helpful in the context of the emerging Neighbourhood Plan. We would be grateful for confirmation that the response has been received, and that the comments have been duly made. We wish to be kept updated regarding consideration of the representations, and the progress of the Neighbourhood Plan more generally.

Yours sincerely

Tom Pike
Director of Planning

For and on behalf of Chilton Grain Limited.

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(13) MR LIVALL

E fm: Mr Livall

Rec'd: 29 May 2023

Re: Great Waldingfield NP 2018-2037 Submission Plan Representations

For the attention of Great Waldingfield NP Consultation, c/o Spatial Planning Policy Team

Dear Mr Bryant

Great Waldingfield Neighbourhood Plan 2018-2037 Submission Plan Representations

I have recently had the pleasure of viewing the Great Waldingfield Neighbourhood Plan 2018-2037 Submission Plan which in general terms I consider to be a very well written and concise Plan. A fundamental flaw is that it does not provide up-to-date biodiversity information in accordance with the National Planning Policy Framework. A supporting Biodiversity Evaluation Report has not been provided and in this respect the Great Waldingfield Neighbourhood Plan compares most unfavourably with the recent Hoxne Neighbourhood Plan Reg 16 Submission consultation (15 Feb to 31 Mar 2023) which contains a 45-page Evaluation Report:

<https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Hoxne-NP-SD8-Landscape-Biodiversity-Evaluation.pdf>

The omission of a supporting Biodiversity Evaluation Report / Ecological Assessment / Parish Biodiversity Action Plan with the Submission Plan is most disappointing and fails to recognise the national concerns expressed by Sir David Attenborough and others highlighting that "**nature is in crisis**" and the desire for local action. I have become increasingly concerned that some Parish Councils may choose [*perhaps on the grounds of financial expediency, insufficient time or lack of ecological expertise*] not to use or give any weight to the relevant biodiversity guidance and tools at their disposal. Biodiversity regrettably appears to still remain a soft option that may give rise to negative responses both from Parish Councils and their professional advisors.

I make a number of objections to the Reg 16 Submission Plan [<https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Gt-Waldingfield-NP-Sub-Draft-Feb23.pdf>], all of which relate to biodiversity.

Objection 1:

The Submission Plan fails to recognise or relate to national concerns that "nature is in crisis". Refer: United Nations Environment Programme [<https://www.unep.org/facts-about-nature-crisis>]

UK's People's Plan for Nature [<https://www.weforum.org/agenda/2023/04/attenborough-people-s-plan-nature-uk/>].

Objection 2:

The Parish Council has not provided up-to-date biodiversity information with their Submission Plan, including data on priority species etc. The Plan therefore does not accord with the relevant sections of the National Planning Policy Framework [namely Paras 8, 28, 31, 174, 175 and 179].

NB: The principle of identifying "Wildlife Corridors (GWD7)" on the Policies Map is to be fully supported but concern is expressed that that the corridors have not been justified with any supporting ecological evidence.

Objection 3:

The Parish Council has not provided evidence that it is accurately assessing and promoting “the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species.” *The Submission Plan therefore does not accord with the relevant sections of the National Planning Policy Framework [namely Paras 8, 28, 31, 174, 175 and 179].*

Objection 4:

Policy GWD7 of the Submission Plan has been written without supporting evidence. *The Plan therefore does not accord with the relevant sections of the National Planning Policy Framework [namely Paras 8, 28, 31, 174, 175 and 179].*

NB: I acknowledge that in Paragraph 7.10 and Community Aspiration 1 of the Submission Plan, reference is made to opportunities to develop a community initiative to enhance existing and create new habitats. I make a strong case that ecological survey work should be undertaken to feed into the Plan preparation process itself before the Regulation 16 stage is reached.

Objection 5:

The Submission Plan should give greater regard to the challenge of climate change and its implications for biodiversity in accordance with the National Planning Policy Framework [namely Paras 8, 11, 98, 131 and Section 14 "Meeting the challenge of climate change, flooding and coastal change"].

Footnote: A key theme emerging currently in Neighbourhood Plans is "climate change" and the "climate emergency".

"Neighbourhood Planning Toolkits & Guidance - How to write a neighbourhood plan in a climate emergency" [February 2020] provides a very useful guide to policy writing and community engagement for low-carbon neighbourhood plans. Section 9 of the Guidance covers "Green infrastructure and biodiversity". Reference: <https://neighbourhoodplanning.org/toolkits-and-guidance/how-to-write-a-neighbourhood-plan-in-a-climate-emergency/>

If the Parish Council is able to address the objections that I have raised it will establish a much stronger policy framework for emerging development proposals that may impact upon the wider biodiversity resource of the Parish, in particular priority habitats [refer MAGIC Map] and the interconnecting ecological network. Finally it will help ensure that the Plan is consistent with national policy, by enabling the delivery of sustainable development in accordance with the National Planning Policy Framework.

I would be grateful if you will kindly acknowledge receipt of my representations. I am aware of the recent changes in the political structures of both Babergh and Mid Suffolk District Councils and have sent copies to key members for information, along with officers of the Suffolk Wildlife Trust.

I hope that it will be possible for the above District Councils to establish a written protocol to ensure that in future their Neighbourhood Plans give full regard to biodiversity matters.

Kind regards

Mr Livall