

# Babergh District Council



## Hadleigh Neighbourhood Plan 2023 - 2037

### Submission Consultation Responses

In April 2024, Hadleigh Town Council (the 'qualifying body') submitted a draft Neighbourhood Plan to Babergh District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Monday 20 May until Friday 5 July 2024

Nineteen representations were received during the consultation period. They are listed below and copies are attached. Also appended for information are two late representation, the first submitted on behalf of Hopkins Homes, the second from the Environment Agency.

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

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Babergh District Council
(3)	Layham Parish Council
(4)	Historic England
(5)	Natural England
(6)	Suffolk Wildlife Trust
(7)	Anglian Water
(8)	Avison Young (obo National Grid)
(9)	National Highways
(10)	Defence Infrastructure Organisation (obo the MOD)
(11)	Sport England
(12)	The Hadleigh Society
(13)	Pegasus Group (obo Ballymore Group and Mr Price)
(14)	Resident: Beggerow
(15)	Resident: Clements
(16)	Resident: Fletcher
(17)	Resident: Llewellyn-Jones
(18)	Resident: Panton
(19)	Resident: Schleip
(20)	Late representation from Armstrong Rigg Planning (obo Hopkins Homes)
(21)	Late representation from the Environment Agency
(22)	Response from Hadleigh Town Council

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# (1) SUFFOLK COUNTY COUNCIL

Date: 05 July 2024  
Enquiries to: Georgia Teague Tel:  
Email: [neighbourhoodplanning@suffolk.gov.uk](mailto:neighbourhoodplanning@suffolk.gov.uk)



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

Dear Mr Bryant,

## **Submission Consultation version of the Hadleigh Neighbourhood Plan**

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

### Flood and Water Management

As part of the Reg14 response, SCC as the Lead Local Flood Authority strongly recommended the inclusion of information regarding to flooding and surface water flood risk.

SCC recommended for either additional wording to be added into Policy HAD1 Design and Character, or a new policy to be created specifically regarding flood risk.

SCC, as the Lead Local Flood Authority, has the responsibility for managing flood risk arising from surface water, ground water and ordinary watercourses. The Environment Agency has the responsibility for managing flood risk from main rivers and the coast. SCC notes that the town is heavily affected by three sources of flood risk (fluvial, pluvial, groundwater).

SCC would strongly recommend that a section on flooding is written into the plan, either inserted into the Natural Environment chapter or as its own dedicated chapter. This should set out how new development shall be steered away from the areas at the highest risk of flooding.

This section should also include details of long-term surface water flood risk and maps.

It is suggested that Policy HAD1 Design and Character includes the additional following text, to address flood risk:

*“D. All development proposals should not result in water run-off that would add to or create surface water flooding; and shall include the use of above ground open Sustainable Drainage Systems (SuDS) where possible, which could include wetland and other water features, which can help reduce flood risk whilst offering other benefits including water quality, amenity/recreational areas and biodiversity benefits.”*

SCC would also recommend the inclusion of a new policy, in the newly-written floods chapter as recommended above, to address flooding and Sustainable Drainage Systems (SuDS).

The following wording is proposed, as an inspiration, for a new policy in the plan:

*“Policy HAD13 - Flooding and Sustainable Drainage*

*Proposals for all new development will be required to submit schemes appropriate to the scale of the proposal detailing how on-site drainage and water resources will be managed so as not to cause or exacerbate surface water and fluvial flooding elsewhere. Proposals should, as appropriate include the use of above-ground open Sustainable Drainage Systems (SuDS). These could include:*

- wetland and other water features, which can help reduce flood risk whilst offering other benefits including water quality, amenity/recreational areas, and biodiversity benefits; and*
- rainwater and stormwater harvesting and recycling; and other natural drainage systems where easily accessible maintenance can be achieved.”*

SCC would very strongly recommend the inclusion of the above additional text into the neighbourhood plan, to be in line with Chapter 14 of the NPPF.

NPPF paragraph 157 states: The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.

NPPF paragraph 158 states: Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures

Therefore, this neighbourhood plan should take a proactive approach to flood risk, and encourage the use of Sustainable Drainage Systems into development in order to mitigate and minimise existing flood risk.

Many other adopted neighbourhood plans in Suffolk have included similar wording to that which is suggested above.

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

Yours sincerely,

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

## (2) BABERGH DISTRICT COUNCIL

Our ref: Hadleigh NP R16 Response

Dated: 5 July 2024

From: Planning Policy Team, Babergh DC

To: Ann Skippers (Independent Examiner)

*Sent by e-mail*

Dear Ann,

### **Reg 16 submission draft Hadleigh Neighbourhood Plan 2023 - 2037 Consultation response from Babergh District Council**

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

As part of this consultation exercise, we re-visited our representations to the Town Council on their Regulation 14 pre-submission draft plan (Dec 2023). We are pleased to see that the majority of our suggestions have been acted upon but have also found it necessary to repeat some of those.

Other changes have also been made to the plan and we comment on those where appropriate to do so. Also, for the benefit of the Town Council, we include an update on information that recently came to light that may help deliver some of their active travel aspirations and suggest that the inclusion of a hook within their plan might be beneficial.

All of our comments are appended to this letter under the relevant chapter headings and we trust that they are helpful

Kind regards,

Caileigh Gorzelak  
Strategic Planning Policy Officer  
Babergh & Mid Suffolk District Councils  
T: 01449 724595  
E: [communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)

Paul Bryant  
Neighbourhood Planning Officer  
Babergh & Mid Suffolk District Councils  
T: 01449 724771 / 07860 829547



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Telephone: (0300) 1234 000  
[www.babergh.gov.uk](http://www.babergh.gov.uk) / [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

## **Chapter 1. Introduction**

**Para 1.5:** We have not commented on this before but do now recommend that the 'Local Planning Authority' sub-heading before paragraph 1.5 should be deleted as it is not relevant at this point.

**Para 1.12:** While the last sentence is true in part, it is not a given at this time that allocations will be made in Hadleigh. We suggest the following:

*"Amongst other things, it is expected that Joint Local Plan Part 2 will set out housing site allocations to provide flexibility and to ensure that over its plan period, district wide housing requirement figures can be met. This may result in housing site allocations in Hadleigh."*

## **Chapter 4. Landscape and Design**

**Para 4.9:** For clarity in the third sentence, insert the word 'assessment' as follows: *"For each RCA, the assessment considers both landscape value and visual sensitivity."*

**Para 4.16** has been added as per our Reg 14 response in order to provide some additional narrative around the choice of settlement boundary shown in Figure 4.4 and on the Policy Maps. The second sentence could be better worded, and we suggest the following:

*"It should be noted that the settlement boundary shown in Figure 4.4 and on the Policies Map is from the 2006 Babergh Local Plan. When adopted, and where appropriate to do so, Joint Local Plan Part 2 is likely to establish new settlement boundaries around specific towns and villages, including around Hadleigh. At this point, the settlement boundary referred to in Policy HAD2 will relate to the new boundary as defined by the Joint Local Plan Part 2."*

### **Key Views Map (Fig 4.4) and Policy HAD2**

Our Reg 14 response suggested that Figure 4.4, the Policies Maps, and Policy HAD2 all refer to the Key Views by number (1, 2, 3 etc.). While the Consultation Statement acknowledges this request, it does not appear to have been followed through in practice. Can the Town Council therefore please confirm that this will be addressed in any future iteration of this plan.

## **Chapter 5. Natural Environment**

**Policy HAD4 (A)** – the reference to Figure 5.3 should read Figure 5.2

**Policy HAD5: Local Green Spaces** - We note the changes made which now places the policy text box before the individual LGS site plans. Also noted is that, in most cases, relevant buildings etc. have now been omitted but some potential exclusion areas still remain. We list these below and recommend that the Town Council ultimately be guided by you as to what is and what is not acceptable in each case:

- LGS-9: in addition to the excluded playgroup building, add the approach road
- LGS-10: in addition to the excluded Leisure Centre Building, add the car-park area

**Figure 5.3:** Two versions of this map are presented in the Plan. To avoid confusion, we suggest that only the map currently shown on page 57 is retained with, subject to the outcome of the above, any individual site adjustments shown accordingly.

## **Chapter 6. Heritage**

### **Policy HAD6, Figures 6.1 to 6.3, and Appendix A**

We commented on just a handful of the 96 proposed NdHAs in our Reg 14 response. In their Consultation Statement, the Town Council have put forward their reasons for retaining both the Caretakers House (ID42) and Cricket Clubhouse (ID62). Those comments are noted.

Regarding NdHA no's ID 54 and ID 70; both of which were described as 'The Cemetery, Friars Road' in Appendix A of the Pre-submission draft plan, we note that the Town Council have removed the latter from Appendix A in the submission draft plan, i.e., ID70 now becomes the four properties on Gallows Hill, and the total number of proposed NdHAs drops to 95 accordingly. This is all OK but the consequences of the ID reference number changes from no.70 onwards do not appear to have been followed through to Figures 6.1 to 6.3. These therefore need modifying accordingly so that the individual NdHA locations from no.70 onwards match up with their Appendix A description.

Finally, the first sentence in **Policy HAD6 (A)** and the first two sentences in **para 6.4** need a modification to now refer to the 95 Non-designated Heritage Assets.

## **Chapter 8. Safe, Sustainable and Active Travel**

In our Reg 14 response we suggested some additions to the plan around the Wolf Way cycle route, a lift-sharing platform, and an action re future-proofing at risk bus-services. We are pleased to see that these have been included where practical to do so, i.e., para 8.4 and in the bulleted actions under para 8.11.

At the time, it was not appropriate for us to comment further on specific active travel interventions, partly because we did not have any that were detailed enough in our district level Local Cycling & Walking Infrastructure Plan (our LCWIP), and partly because doing so would have risked raising premature expectations around feasibility and funding. More recently, Suffolk County Council have advised us that they have received S106 funding for strategic improvements in Hadleigh which will be used to develop and deliver schemes that will be included in their emerging Area Plan for the town – which aligns with/has taken steer from the 'Hadleigh Transport Study':

<https://www.babergh.gov.uk/documents/d/babergh/hadleigh-np-transport-study-report-feb23>

SCC will commit some of its own funding through the Area Plan to develop schemes, but there is an expectation that developer funding will be secured to deliver significant infrastructure improvements beyond the S106 funding currently available. While these funding streams will still be available regardless of the outcome of the following suggestion, it would perhaps be helpful if the potential short, medium, and long-term transport improvements set out in paragraph 8.4 of the Transport Study could be included as a hook within the Neighbourhood Plan itself, perhaps as an appendix linked Policy HAD9(A)?

## **Chapter 10. Community, Visitor & Service Economy**

### **Sport and Leisure Provision**

We note the addition of Policy HAD13 and have no specific issue with it as written. However, the Town Council may want to consider whether the desire for enhancement of facilities should, where

appropriate, be applied to all development proposals and not just sites that are allocated. Large sites are still able to come forward without them being allocated in the first instance.

### **Additional observations**

#### **Supporting Documents**

Where practical to do so, we would suggest updating the supporting evidence documents to the most recent version of the NPPF (at the time of writing this is the December 2023 version) and to the adopted Part 1 Joint Local Plan (rather than the emerging Joint Local Plan). This will ensure that these supporting documents conform with adopted policy at the national and district level at the time the Hadleigh Neighbourhood Plan is adopted.

The following is not be an exhaustive list but notes where references could/should be updated:

- Design Code – see pages 8 and 9
- Landscape & Biodiversity Evaluation – see pages 5, 6, 7 19, and 43
- Landscape & Views Report – see pages 3, 6, 18, 25, and 29
- Local Green Space Report – see pages 3, 4, and 5
- Hadleigh Shopfront Design Codes – see page 11

[Ends]



### (3) LAYHAM PARISH COUNCIL

**E from:** Parish Clerk obo Layham Parish Council

**Rec'd:** 28 June 2024

**Subject:** Hadleigh NP R16 consultation

Layham Parish Council met on 26 June and considered the draft Neighbourhood Plan for Hadleigh. Councillors were pleased with the plan and especially the emphasis on green spaces. They would like to see more facilities for teenagers and young adults, following the closure of East House.

We hope these comments will be taken into consideration.

Jane Cryer

*Clerk / Proper Officer & RFO*

*Layham Parish Council*

[layhampc@gmail.com](mailto:layhampc@gmail.com)

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## (4) HISTORIC ENGLAND



Historic England

Via e-mail  
Paul Bryant  
Neighbourhood Planning Officer  
Babergh & Mid Suffolk District Councils

Direct Dial: [REDACTED]  
Our Ref: PL00794494

14 June 2024

Dear Mr Bryant,

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of the Hadleigh 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, but we are pleased to see the historic environment features throughout the Plan. In particular, we welcome the inclusion of Section 6 'Historic Environment', and Policy HAD6. We consider that overall, this plan has a positive strategy for the conservation and enjoyment of the historic environment within the Parish.

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](mailto:eastplanningpolicy@historicengland.org.uk) <mailto: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

Ross McGivern Historic Places Advisor  
E-mail: [ross.mcgivern@historicengland.org.uk](mailto:ross.mcgivern@historicengland.org.uk)



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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

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## (5) NATURAL ENGLAND

Date: 03 July 2024  
Our ref: 476606  
Your ref: Hadleigh Neighbourhood Plan

Mr Paul Bryant  
Babergh & Mid Suffolk District Councils

**BY EMAIL ONLY**

[paul.bryant@baberghmidsuffolk.gov.uk](mailto:paul.bryant@baberghmidsuffolk.gov.uk)



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

Dear Mr Bryant

### **Hadleigh Neighbourhood Plan - Regulation 16 Consultation**

Thank you for your consultation on the above dated 17 May 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

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

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

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

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. 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](#)<sup>3</sup>.

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](#)<sup>4</sup> website and also from the [LandIS website](#)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

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

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

### Landscape

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

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

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<sup>1</sup> <http://magic.defra.gov.uk/>

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

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

<sup>4</sup> <http://magic.defra.gov.uk/>

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

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

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

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. 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](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> 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](#)<sup>12</sup>.

## **Improving your natural environment**

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

Opportunities for environmental enhancement might include:

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

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

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

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).
- 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).

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

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

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

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

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

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

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

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



## **(6) SUFFOLK WILDLIFE TRUST**

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

24<sup>th</sup> May 2024

### **RE: Consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 | The Hadleigh Neighbourhood Plan 2023 - 2037**

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

We are happy to see that the plan recognises the biodiversity crisis and seeks to ensure that new development within the parish suitably contributes to nature recovery.

#### **Natural Environment**

Suffolk Wildlife Trust wholeheartedly support the ambition that new development within the parish should go beyond the mandatory 10% Biodiversity Net Gain and seek to achieve 20% net gain.

We further support the comments made regards planting, providing habitat for a range of species, and the use of landscaping with multiple positive benefits.

#### **Policy Had3: Biodiversity-Led & Wildlife-Friendly Design**

Suffolk Wildlife Trust support this policy, through points A, B, and C.

With note to point B, which includes an aspiration for Biodiversity Net Gain to deliver 20% net gain within the parish, we offer the following supporting evidence:

A similar aspiration is also put forward by Babergh & Mid-Suffolk District Councils in their draft Supplementary Planning Document *Biodiversity and Trees*<sup>1</sup> where an aspiration for 20% is put forward. Suffolk Wildlife Trust reiterate, that it is important to highlight that 10% is, “*In simple terms, is the lowest level of net gain that [DEFRA] could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives.*”<sup>2</sup>

<sup>1</sup> Section 4.14. Babergh and Mid Suffolk District Councils, *Biodiversity and Trees Supplementary Planning Document Consultation*, <https://baberghmidsuffolk.oc2.uk/docfiles/77/Biodiversity%20and%20Trees%20SPD%20Consultation%20Document%20-%20May%202024.pdf>

<sup>2</sup> DEFRA Impact Assessment: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/839610/net-gain-ia.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf)

Maidstone Borough Council recently included a requirement for a minimum 20% net gain in their emerging local plan<sup>3</sup>. The plan went to review after changes to Planning Practice Guidance (PPG)<sup>4</sup> where changes to the wording may suggest that delivering above 10% may be undesirable and requires justification. However, the inspector's report of the Maidstone Local Plan<sup>5</sup> noted that there was suitable evidence and justification provided. Suffolk Wildlife Trust therefore believe that, with suitable justification provided within the plan and here by Suffolk Wildlife Trust, the Hadleigh Neighborhood Plan includes suitable justification to support aspirations for net gain to deliver above the statutory minimum level of 10%. We provide further supporting evidence as an appendix to this letter.

#### **Policy HAD4: Green/Blue Corridors and Verges**

The importance of ecological connectivity is clearly identified, through both green and blue corridors. This policy also identifies the nine County Wildlife Sites in Hadleigh, as well as priority habitat and Natural England's Network Expansion Zone. Ecological networks are clearly mapped within the plan and link towards the wider landscape.

Policy HAD4 A is clear in supporting, protecting, and enhancing the ecological network within the parish.

#### **Policy HAD5: Local Green Spaces**

This policy clearly identifies local greenspace, including sites, including County Wildlife Sites and Local Nature Reserves. Access to nature is hugely important in engaging more people with the natural environment, offering physical and mental health benefits to individuals and communities, while also raising awareness of the need to protect and enhance the natural world.

Yours sincerely,

Alex Jessop

Planning & Advocacy Officer

[planning@suffolkwildlifetrust.org](mailto:planning@suffolkwildlifetrust.org)

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<sup>3</sup> Maidstone Borough council, 2021, Local Plan review, Draft Plan for Submission (Reg.19), <https://drive.google.com/file/d/13MfNeKxSGxYlFCKZcP6-ggua2EFlnt/view>

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

<sup>5</sup> Spencer, D., 2024, Report to Maidstone Borough Council, Report on the Examination of the Maidstone Local Plan Review, PINS/U2235/429/10, <https://drive.google.com/file/d/1BpJD7DyWVbclC0QQ2pLhEY5o3hWXo1Mb/view>

## Appendix: Evidence to support and justify aspiration for 20% BNG within Policy HAD3

The inspector's report of the Maidstone Local Plan<sup>5</sup> Para.368 states;

- *“The policy sets a requirement for a minimum 20% BNG. Whilst the national BNG requirement is set at a minimum 10%, there is nothing in the NPPF 2021 or the Environment Act 2021 to suppress local authorities seeking more ambitious minimum targets through Local Plans provided it is justified. The environmental baseline in the SA [Sustainability Appraisal] confirms that Kent has not met its 2010 Biodiversity targets, and is unlikely to have met 2020 targets, and this is set to decline further without targeted interventions. In this regard I was referred to the collaborative approach being taken across Kent, including through the Kent Nature Partnership and from Kent Wildlife Trust<sup>6</sup> that is seeking a minimum 20% BNG in Local Plan policies. This would also align with widespread representations at earlier stages of Plan preparation for a stronger policy framework for biodiversity, as set out in the Environment Topic Paper.”*
- (Para 369) *“At a more local level, seeking a 20% BNG would clearly align with the objectives and ambitions set out in the Council’s Climate Change and Biodiversity Strategy and Action Plan<sup>7</sup>. This includes a number of actions for the Borough Council including implementing a Biodiversity Strategy and a Nature Recovery Strategy and working with others to deliver landscape scale biodiversity initiatives. The minimum 20%, measured against the latest metric, is strongly supported by Natural England and KCC, amongst others. SA has also taken account of 20% BNG, both as part of Policy LPRSP14(A) and in the strategic policies for Heathlands and Lidsing, which has informed an assessment that it can be anticipated to have positive effects in mitigating the effects of development.”*

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

- The 2023 State of Nature Report<sup>8</sup> highlights that, despite considerable conservation efforts over recent decades, many species continue to decline. This includes, of note to Suffolk:
  - The abundance of 753 terrestrial and freshwater species has on average fallen by 19% across the UK since 1970. Within this average figure, 290 species have declined in abundance (38%).
  - The UK distributions of 4,979 invertebrate species have on average decreased by 13% since 1970. Stronger declines were seen in some insect groups which provide key ecosystem functions such as pollination (average 18% decrease in species’ distributions).
  - Since 1970, the distributions of 54% of flowering plant species and 59% of bryophytes (mosses and liverworts) have decreased across Great Britain.
  - 10,008 species were assessed using Red List criteria. 2% (151 species) are extinct in Great Britain and a further 16% (almost 1,500 species) are now threatened with extinction.
- The UK Government’s 25-Year Environment Plan<sup>9</sup> includes the following targets, which are more likely to be met should BNG deliver levels above 10%:
  - Restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favorable condition

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

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

<sup>8</sup> [https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report\\_2023\\_FULL-DOC-v12.pdf](https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf)

<sup>9</sup> <https://assets.publishing.service.gov.uk/media/5ab3a67840f0b65bb584297e/25-year-environment-plan.pdf>

- Creating or restoring 500,000 hectares of wildlife-rich habitat outside of the protected sites network, focusing on priority habitats as part of a wider set of land management changes
- Increasing woodland in England in line with our aspiration of 12% cover by 2060; this would involve planting 180,000 hectares by the end of 2042.
- The UK Government has committed to delivering “30by30” on Land in England<sup>10</sup>:
  - In 2020, the government committed to protecting 30% of the UK’s land by 2030 (30by30). Thanks to UK leadership, a global 30by30 target was adopted at the UN Biodiversity Summit COP15 in December 2022, as part of an ambitious Global Biodiversity Framework.
  - In October 2023, Wildlife and Countryside Link published the 30by30 in England 2023 Progress Report<sup>11</sup>. This found:
    - The area of England effectively protected for nature is still hovering around 3.11% on land and at maximum 8% at sea.
    - The UK is one of the most nature-depleted countries in the world, sitting in the bottom 10% globally for biodiversity remaining.
- At a minimum, the UK has failed to meet 14 of the 19 Aichi biodiversity targets, the global nature goals the UK committed to meet by 2020<sup>12</sup>, which were put forward as part of a “2020 Vision”<sup>13</sup>.
- West Suffolk Council have declared a climate and environment emergency<sup>14</sup> and following the introduction of the Environment Act 2021, West Suffolk Council as a public authority must consider how to conserve and enhance biodiversity in the area. This ‘biodiversity duty’ requires West Suffolk Council to “*consider what we [WSC] can do to conserve and enhance biodiversity.*”
- East Suffolk Council have, alongside declaration of a climate emergency in 2019, now declared a biodiversity emergency<sup>15</sup>.
- Suffolk County Council have declared a climate emergency<sup>16</sup> and will continue to change approaches to progress to net zero, and work to encourage others’ behavior changes, stating, “*Both are needed to protect and enhance Suffolk’s environment and biodiversity*”.
  - SCC state, we will fulfil this ambition by: *Promoting biodiversity and conserving natural habitats and open spaces*<sup>16</sup>.
- Babergh Mid-Suffolk District Council declared a climate and biodiversity emergency in 2019<sup>17</sup> and in September 2019, councilors approved commitments to enhance and protect biodiversity across the district.
  - Furthermore, and as noted above, the new draft SPD Biodiversity and Trees includes an ambition to deliver 20% net gain<sup>1</sup>.

<sup>10</sup> [https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering\\_30by30\\_on\\_land\\_in\\_England.pdf](https://assets.publishing.service.gov.uk/media/65807a5e23b70a000d234b5d/Delivering_30by30_on_land_in_England.pdf)

<sup>11</sup> [https://wcl.org.uk/assets/uploads/img/files/WCL\\_2023\\_Progress\\_Report\\_on\\_30x30\\_in\\_England\\_1.pdf](https://wcl.org.uk/assets/uploads/img/files/WCL_2023_Progress_Report_on_30x30_in_England_1.pdf)

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

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

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

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

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

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

## (7) ANGLIAN WATER

### Consultation Response Form

#### Hadleigh Neighbourhood Plan 2023 - 2037

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

Hadleigh Town Council have prepared and submitted a draft neighbourhood plan to Babergh District Council which sets out a vision for their area and contains policies which they intend to be used to help determine planning applications within the designated area.

The submitted Plan etc. can be viewed online at: <https://www.babergh.gov.uk/hadleighNDP>

### 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:	Carry Murphy
Job Title (if applicable):	Spatial and Strategic Planning Manager – Sustainable Growth
Organisation / Company (if applicable):	Anglian Water
Address:	Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire.
Postcode:	PE29 6XU
Tel No:	
E-mail:	cmurphy5@anglianwater.co.uk

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

## Section Two: Your comment(s)

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

Paragraph No.	N/a.	Policy No.	N/a.
---------------	------	------------	------

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 type="checkbox"/>

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

Anglian Water has previously submitted comments on the pre-submission version (Reg 14) of the neighbourhood plan. We welcome the amendments in the submission version of the neighbourhood plan, following our comments and recommended changes.

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

**What improvements or modifications would you suggest?**

N/a.

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.

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

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

**Signed: C. Murphy**

**Dated: 27/06/24**

## (8) AVISON YOUNG (obo National Grid)



Central Square  
Forth Street  
Newcastle upon Tyne  
NE1 3PJ

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

avisonyoung.co.uk

Our Ref: MV/ 15B901605

24 June 2024

Babergh District Council  
[communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)  
**via email only**



Dear Sir / Madam

### **Hadleigh Neighbourhood Plan - Regulation 16 Consultation**

**May - July 2024**

### **Representations on behalf of National Grid Electricity Transmission**

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

#### **About National Grid Electricity Transmission**

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

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

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

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

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

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

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

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://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](http://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](mailto:nationalgrid.uk@avisonyoung.com)

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

**Tiffany Bate, Development Liaison Officer**

[box.landandacquisitions@nationalgrid.com](mailto: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](mailto: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](http://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](mailto:nationalgrid.uk@avisonyoung.com)

*[PLEASE NOTE: This page has intentionally been left blank]*

Our ref: NH/24/06424

Your ref: Hadleigh N'hood Plan Reg 16

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

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

03 July 2024

Via email to: [communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)

Attention:

Dear Sir/Madam,

**Consultation under Reg' 16 of the Neighbourhood Planning (General) Regulations 2012  
The Hadleigh Neighbourhood Plan 2023 - 2037**

Thank you for your correspondence, dated on 17 May 2024, notifying National Highways of the consultation under Regulation 16.

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

National Highways reviews the vision and objective strategy outlined within this Submission Draft Hadleigh Neighbourhood Plan 2023-2037.

Please find National Highways comments below:

Previously, we reviewed the Pre-Submission Regulation 14 Draft Version. This current Submission Draft Neighbourhood Plan covered the same period (2023 – 2037), which also corresponds with the planning period applicable to the emerging Babergh and Mid Suffolk Joint Local Plan. Babergh and Mid Suffolk Joint Local Plan Part 2 is being prepared, where there will be sites for development within Hadleigh plan area.

This current Hadleigh Neighbourhood Plan Submission Version (Regulation 16) Draft, there are proposed policies related to the local area characteristics, green spaces or



corridors, heritage assets, energy efficient design and low carbon development strategy, we do not have any comment on those.

In relation to the Safe, Sustainable and Active Travel, we encourage the planning strategy on making improvements and enhancements for more walking and cycling scopes; for example, POLICY HAD9.

The vision, objective, and proposed policies within this Submission Version Draft Hadleigh Neighbourhood Plan 2023-2037 would not have any predicted adverse impact on the Strategic Road Network (SRN).

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

We do not have any more comments of this.

Please contact us [PlanningEE@nationalhighways.co.uk](mailto:PlanningEE@nationalhighways.co.uk) if you require any clarification.

Yours faithfully,

S. H.  
Dr Shamsul Hoque  
Assistant Spatial Planner

### **Standing advice to the local planning authority**

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

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

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

## (10) DEFENSE INFRASTRUCTURE ORGANISATION (obo 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: Hadleigh  
Neighbourhood Plan Reg16 consultation

Mobile: +44 (0) 7800 505824

Our reference: 10060421-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

[christopher.waldron861@mod.gov.uk](mailto:christopher.waldron861@mod.gov.uk)

28<sup>th</sup> June 2024

Dear Paul

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

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

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

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

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

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

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

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

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

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

The MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, and Biodiversity Net Gain; Babergh & Mid Suffolk District Councils bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. The proximity of a site that is to be enhanced to a statutorily safeguarded site and asset should be considered.

Enhancements that require or result in the introduction of tall structures (whether temporarily or permanently), or where plants or trees are planted may degrade aviation safety, either by introducing physical obstacles to aircraft, or by degrading or compromising the operation and capability of safeguarded technical assets. Where enhancements include ground works that might result in open water (whether temporarily or permanently), the introduction or plant/tree species that bear berries or fruit, or the introduction of tree species that provide dense canopy, and the enhanced site is within 12.87km of an MOD aerodrome, it is possible that bird strike risk can be introduced or exacerbated to the detriment of aviation safety.

In summary, where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone

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

Yours sincerely

*C Waldron*

Chris Waldron  
DIO Assistant Safeguarding Manager



## (11) SPORT ENGLAND

**E from:** Planning.Central@sportengland.org  
**Rec'd:** 10 June 2024  
**Subject:** Hadleigh Neighbourhood Plan

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

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

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

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy)

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

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

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

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

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

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

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

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

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

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

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

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

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

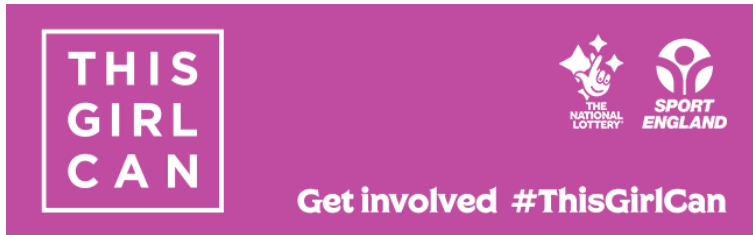
*(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)*

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

Yours sincerely,

**Planning Technical Team**

E: [planning.central@sportengland.org](mailto:planning.central@sportengland.org)



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



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

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/>. If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing [DPO@sportengland.org](mailto:DPO@sportengland.org)

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## (12) THE HADLEIGH SOCIETY

### Consultation Response Form - Hadleigh Neighbourhood Plan 2023 - 2037

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

Hadleigh Town Council have prepared and submitted a draft neighbourhood plan to Babergh District Council which sets out a vision for their area and contains policies which they intend to be used to help determine planning applications within the designated area.

The submitted Plan etc. can be viewed online at: <https://www.babergh.gov.uk/hadleighNDP>

### 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:	Richard Fletcher
Job Title (if applicable):	Chairman & Secretary
Organisation / Company (if applicable):	The Hadleigh Society [Executive Committee]
Address:	% 6 Lister Road, Hadleigh
Postcode:	IP7 5JN
Tel No:	01473 827891
E-mail:	<a href="mailto:secretary@hadsoc.org.uk">secretary@hadsoc.org.uk</a>

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

## Section Two: Your comment(s)

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

<b>Paragraph No.</b>	1.1 to 10.14 & 10.17 to 12.14	<b>Policy No.</b>	All Policies except HAD13
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**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

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

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

The Hadleigh Society [Executive Committee] support the Vision and Objectives of the Neighbourhood Plan which reflects the Society's own aims and objectives for the town of actively supporting the promotion of high standards in planning, conservation, regeneration and development of features within the Hadleigh district and deemed to be of historical or environmental significance.

In this respect the Society particularly supports Policy HAD1-Design & Character and HAD2-Landscape and Key Views, in regard to proposals for new built development and controlling its impact upon the surrounding countryside.

Other policies which The Hadleigh Society consider will contribute positively to maintaining and improving the special quality of life in the town are Policies HAD4, HAD5, HAD6, HAD10, and HAD12 that deal with;- Green/Blue corridors and verges, Local Green Spaces, Non-designated Heritage Assets, Access to the Countryside and Hadleigh Town Centre.

The Hadleigh Society also recognises the increasing importance in safeguarding the greater well being of the population and the need to seek more environmentally sustainable actions as sought by Policies HAD3, HAD7, HAD8, HAD9 and HAD 11 that deal with ;- Biodiversity-led and Wildlife-Friendly Design, Low Carbon Development, Community Energy, Enhancing Walking and Cycling, and Co-housing Schemes

Overall The Hadleigh Society supports the proposed Hadleigh Neighbourhood Plan, with the exception of Policy HAD13 which it considers undermines the otherwise good intent of the Plan. Reasons for objection to Policy HAD13 are submitted separately.

**What improvements or modifications would you suggest?**

*Please be as brief and concise as possible ...*

*(Continue on separate sheet if necessary)*

## Section Two: Your comment(s)

<b>Paragraph No.</b>	10.16	<b>Policy No.</b>	HAD13
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**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>		<b>Oppose</b>	X
<b>Support with modifications</b>		<b>Have Comments</b>	X

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

Policy HAD13 was introduced into the Hadleigh Neighbourhood Plan following the conclusion of the Regulation 14 public consultation and thus did not benefit from detailed consideration by the Neighbourhood Plan Working Groups.

It is considered that the policy is seriously deficient as;-

- 1] The policy seeks to extend itself beyond The Hadleigh Neighbourhood Plan Area by addressing all “....strategic site allocations in the Babergh and Mid Suffolk Joint Local Plan Part 2 area ...”
- 2] The Hadleigh Neighbourhood Plan deliberately does not propose any new areas for residential development as it is considered that the existing provision of medical, educational and social services are already highly stressed and thus it is inappropriate to then propose supporting more major housing development of 200+ dwellings in the town to achieve possible new sports facilities.
- 3] The policy seeks to improperly impose the proposed provision of new/improved sports leisure and community facilities as a prime determinate for allocation of new housing sites in the emerging Part 2 of the Local Plan and is thus circumventing current Local Plan Procedures. [See paragraph 10.16]
- 4] The policy will unreasonably skew the current Local Plan Part 2 trawl for major new allocations in Hadleigh, in particular by giving tacit [even if unintended] support to developers whose current public submissions for Hadleigh include providing sports facilities in concert with their major housing proposal [200+ dwellings} that they seek to have adopted in Part 2 of the Local Plan.[See paragraph 10.16]
- 5] The policy becomes redundant when Part 2 of the Local Plan is adopted and thus leaves the Neighbourhood Plan devoid of any long term strategy for provision of new/ improved community, leisure and sports facilities.
- 6] Policy HAD13 is in conflict with Policy HAD2 A & B of the Neighbourhood Plan as Policy HAD13 fails to acknowledge importance of environmental and landscape matters as required by policy HAD2
- 7] The term ‘strategic site allocations’ used in the policy is not defined and thus causes difficulty in interpretation and application.

Paragraph 10.16 should be deleted as it is not for The Neighbourhood Plan to seek to ensure that the site allocations in the Joint Local Plan Part 2 fully consider the needs of the local sports community and engage them fully when considering the sport and leisure needs which these allocations can address on site as part of their development. Such considerations should emerge through the normal course of public consultation and Local Plan Inquiry Procedures. Furthermore the Neighbourhood Plan does not specifically indicate support for further major housing allocations and therefore the policy is prejudicial to the content of the remainder of the Neighbourhood Plan.

**What improvements or modifications would you suggest?**

THE MODIFICATION SUGGESTED IS DELETION OF PARAGRAPH 10.16 AND AN ALTERNATIVE WORDED POLICY HAD13 WHICH STATES;-

- 8] The reuse/repurposing of vacant buildings, no longer proved suitable/viable for their original or related uses, will be supported for use for indoor sports/leisure/cultural activities subject to not causing loss of residential amenities or causing highway dangers.
- 9] The provision of new and/or improved indoor and outdoor sports facilities will be supported where they are well located in relation to both, principal existing and new residential areas, readily accessible by foot, bike or bus, would not cause highway dangers, loss of residential amenities, nor cause damaging visual intrusion into surrounding countryside landscape

This redrafted policy reflects the supporting text of paragraphs 10.8 to 10.15; as it acknowledges environmental and social community aspects and can be applied throughout the life of the Neighbourhood Plan.

**Section Two: Your comment(s)**

<b>Paragraph No.</b>	Appendix A	<b>Policy No.</b>	HAD6
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**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>		<b>Oppose</b>	
<b>Support with modifications</b>	X	<b>Have Comments</b>	

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

My comment is that in Appendix A the list of Non Designated Heritage Assets is incorrect as it does not list 'Bacon Lane' although it is quite clearly located on the Map on Page 61 as item 97, and is contained within the Local List on the Society website page 9.

This would appear to be a drafting error easily corrected

Requires correction as Policy HAD6 specifically refers to the Appendix

**What improvements or modifications would you suggest?**

*Please be as brief and concise as possible ...*

*(Continue on separate sheet if necessary)*

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

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



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

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

*Please be as brief and concise as possible ...*

*(Continue on separate sheet if necessary)*

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

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

**Signed:** R Fletcher

**Dated:** 3 July 2024

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## (13) PEGASUS GROUP (obo Ballymore Group & Mr Price)

### Consultation Response Form

#### Hadleigh Neighbourhood Plan 2023 - 2037

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

Hadleigh Town Council have prepared and submitted a draft neighbourhood plan to Babergh District Council which sets out a vision for their area and contains policies which they intend to be used to help determine planning applications within the designated area.

The submitted Plan etc. can be viewed online at: <https://www.babergh.gov.uk/hadleighNDP>

### Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	Mr Robert Barber
Job Title (if applicable):	Executive Director
Organisation / Company (if applicable):	Pegasus Group
Address:	Suite 4, Pioneer House Vision Park, Chivers Way Histon
Postcode:	CB24 9NL
Tel No:	01223202100
E-mail:	Robert.Barber@pegasusgroup.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Ballymore Group and Mr Price
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.

<b>Paragraph No.</b>		<b>Policy No.</b>	HAD2; HAD3; HAD13
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**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>		<b>Oppose</b>	
<b>Support with modifications</b>	✓	<b>Have Comments</b>	

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

These representations are made by Pegasus Group on behalf of Ballymore Homes and Mr Paul Price ('the respondent'), in the context of development interests at Land South of Pond Hall Road, Hadleigh ('the site'). Details of this scheme and the rationale behind its promotion have been set out in previous representations, which should be referred to. The respondent considers that there are two policies in the Hadleigh Neighbourhood Plan Submission ('the Plan') which would benefit from minor modifications to ensure the relevant Basic Conditions are met.

The first is criterion B of Policy HAD2 which relates to the Area of Local Landscape Sensitivity ('ALLS'), and states that the ALLS will be 'protected from development' except where the stated (3) exceptions are met. The policy currently states 'and' between exception, indicating they all must be met for development to be acceptable. The exceptions are not mutually compatible, the use of 'or' between each exception would therefore be more appropriate.

Exception 2 of Policy HAD2(B) refers to delivering positive change in line with the findings of Hadleigh Landscape Assessment 2023. This is a subjective requirement that cannot be applied uniformly across different schemes by a decision maker. It is also not in conformity with Policy LP17 of the Joint Local Plan which requires landscape and visual effects to be assessed, and then for mitigation and enhancement measures to be identified for any adverse effects. It is recommended that the policy is amended as follows:

where available opportunities to deliver **appropriate mitigation and / or enhancement measures positive change** (following the management recommendations Rural Character Areas HRCA1, 2, 3, 4 and 8)-set out in the Hadleigh Landscape Assessment 2023) have been demonstrated through an assessment of landscape and visual impacts (proportionate to the scheme proposed);

The second policy requiring modification is Policy HAD3(B) which requires off-site improvements to be delivered within the Hadleigh Neighbourhood Plan area. It is appreciated this change has been made to the policy as a result of comments made by Babergh District Council at the Regulation 14 consultation (as per the Consultation Statement). However, this requirement does not align with national guidance on biodiversity net gain. It is recommended this requirement is removed from Policy HAD3, and it is clarified that this is 'encouraged' rather than required.

The legislative requirement for biodiversity net gain is 10%. The environmental benefits of encouraging the delivery of more than the legislative minimum of 10% biodiversity net gain has not been evidenced. Policy HAD3 should therefore make it clear that the mandatory requirement that needs to be met by eligible sites is 10% biodiversity net gain, in line with national legislation and Policy LP16 of the Joint Local Plan.

The respondent considers that the matters raised above are capable of remedy and that the Plan

can, in due course and with appropriate modification, be found sound. The respondent looks forward to the Town Council's response to the matters that have been raised in these representations, and to being kept up to date with the progress of the Examination.

*(Continue on separate sheet if necessary)*

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

The inclusion of Policy HAD13: Sports and Leisure Provision is fully supported as an important step towards ensuring the needs of local sports and community clubs are met. These needs have already been clearly evidenced in the Hadleigh Sporting Community Status and Plan and responses made by sports clubs to the Regulation 14 consultation as summarised in the Consultation Statement. The respondent's previous representations referred to its own evidence gathering on local demand for sports and community facilities when formulating the scheme that is proposed at Land South of Pond Hall Road, which will ensure the scheme is designed to meet those needs in line with the proposed Policy HAD13.

**What improvements or modifications would you suggest?**

Please see above.

*(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:**

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

<b>Signed:</b> <i>Pegasus Group</i>	<b>Dated:</b> 01.07.2024
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## (14) RESIDENT - Beggerow

### Consultation Response Form

#### Hadleigh Neighbourhood Plan 2023 - 2037

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

Hadleigh Town Council have prepared and submitted a draft neighbourhood plan to Babergh District Council which sets out a vision for their area and contains policies which they intend to be used to help determine planning applications within the designated area.

The submitted Plan etc. can be viewed online at: <https://www.babergh.gov.uk/hadleighNDP>

### Section One: Respondents Details

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

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

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

## Section Two: Your comment(s)

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

<b>Paragraph No.</b>	10.16	<b>Policy No.</b>	HAD13
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**Do you support, oppose, or wish to comment on the above? (Select one answer below)**

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

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

The needs for increased provision for sporting facilities in Hadleigh have been articulated for many years by many people and organisations. I have lived in Hadleigh for over 47 years and in that time not a single acre of land has been allocated for the provision open sports space for the ever growing Hadleigh population and sports clubs.

I fully support the Town Council's position as written in Para 10.16 and Policy Statement HAD13 It is incumbent on the District Council's Joint Local Plan Part 2 to recognise within the Call to Sites process to support housing developments that can fund the provision of additional sports facilities in Hadleigh. See the document published by the Town Council within the Draft Neighbourhood Plan . <https://www.babergh.gov.uk/documents/d/babergh/hadleigh-np-sporting-community-report-2021>

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

*Please be as brief and concise as possible ...*

*(Continue on separate sheet if necessary)*



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

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

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

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

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

*Please be as brief and concise as possible ...*

*(Continue on separate sheet if necessary)*

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

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

<b>Signed:</b>		<b>Dated:</b> 2/7/2024
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## (15) RESIDENT – Clements

**Rec'd:** 3 July 2024

**Subject:** Hadleigh Neighbourhood Plan

Dear Paul

I generally agree with the contents of the Hadleigh Neighbourhood Plan, but I do have some specific comments and objections which I should like you to take account of.

I strongly support Policy **HAD 1** Design and Character and **HAD2** Landscape and Key Views. This policy works well for new building development and controlling the impact upon surrounding countryside - in particular the landscape on both sides of the road entering Hadleigh from Sudbury and the magnificent views from the A1071 and Castle Field (with rare Lupins) across to Kersey Church (C14 and C15 flint and stone Church) [CHURCH OF ST MARY, Kersey - 1351459 | Historic England](#) from the historic footpath at the back of Castle Road, Hadleigh.

### **HAD 1, 3, 4, 5, 7, 8, 9, 10, & 11**

I support **HAD1** and the policies for protecting and enhancing green spaces and the environment. These should be retained as once lost, they are gone forever.

**HAD2** - This Policy ensures the long-term vision of Hadleigh continuing as a historic rural market town and ensures its vitality and viability. Dwellings are not far from the landscape and views into the countryside, plus access to the countryside and nature reserves.[see para 4.1]

The Adopted Part 1 JLP LP17 paras. 15.19 to 15.24 states “*The landscape and the historic environment have a strong inter-relationship, as the character of the landscape is influenced by its historic environment, as well as traditional villages and historic townscapes. Equally, the landscape can be important to the setting of an historic asset*”. As Part 1 of JLP has been adopted, this is key to the emerging Part 2 JLP.

An **Area of Local Landscape Sensitivity (ALLS)** as provided in the Neighbourhood Plan is very important to protect the area from harm.

Other policies are supported and those which contribute positively to maintaining and supporting the special quality of the town are Policies **HAD 4, 5, 6, 10, and 12** covering Green and Blue corridors and verges, Local Green Spaces, non-designated Heritage assets, access to the countryside and the character, vitality, and viability of Hadleigh town centre.

It is recognised that other policies which contribute positively to greater wellbeing of the population and support **HAD 3, 7,8, 9 and 11** dealing with biodiversity, wildlife friendly design, low carbon development, community energy, enhancing walking and cycling and co-housing schemes should be fully supported.

I do not support **HAD13** which contradicts and conflicts with other areas of the draft Hadleigh Neighbourhood Plan.

Policy **HAD13** is in conflict with Policy **HAD2 A & B** of the Neighbourhood Plan as Policy **HAD13** fails to acknowledge the importance of the environmental and landscape matters as required by policy **HAD2**.

### **HAD 13 Sports and Leisure provision –**

The policy seeks to extend itself beyond The Hadleigh Neighbourhood Plan Area by addressing all “strategic site allocations in the JLP Part 2 area.”

Proposals to deliver strategic site allocations in the JLP part 2 should ensure that they address local need for new or expanded and enhanced sports, leisure, and community facilities for all users, which are accessible to both existing and new residents particularly by walking or cycling. There should be informed engagement with local sports and community clubs and providers in the town of Hadleigh to establish existing and future needs and opportunities. These should be deliverable and not just desirable.

### **ADDITIONAL GENERAL COMMENTS**

**Character Assessment of Area 1** Zone A - Ann Beaumont Way, Bridge Street, Castle Rise, Woodlands, and Gallows Hill -

Whilst mentioned in the Local List, which is an Attachment to the Plan, there is no mention in the Character Assessment for Zone A of the historic Bacon Lane, which is a medieval hollow, which has recently been granted Monument status by Suffolk County Council.

[HAD 264 - Earthwork of a possible medieval Hollow Way "Bacon Lane" - Suffolk Heritage Explorer](#)

[Local action helps protect Hadleigh's medieval Bacon Lane | East Anglian Daily Times \(eadt.co.uk\)](#)

Thank you for considering my views and I should be grateful if you would acknowledge receipt of my email.

[Ends]

## (16) RESIDENT - Fletcher

### Consultation Response Form

#### Hadleigh Neighbourhood Plan 2023 - 2037

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

Hadleigh Town Council have prepared and submitted a draft neighbourhood plan to Babergh District Council which sets out a vision for their area and contains policies which they intend to be used to help determine planning applications within the designated area.

The submitted Plan etc. can be viewed online at: <https://www.babergh.gov.uk/hadleighNDP>

### Section One: Respondents Details

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

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

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

## Section Two: Your comment(s)

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

<b>Paragraph No.</b>	4.6 to 4.13	<b>Policy No.</b>	HAD2
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**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>	X	<b>Oppose</b>	
<b>Support with modifications</b>		<b>Have Comments</b>	

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

Policy HAD2

It is considered that this Policy represents a vital tool in ensuring that the long term vision of Hadleigh continuing as an attractive vital historic rural market town with one of the principle reasons why people enjoy living in the parish is because of the high quality landscape and views into the countryside, plus access to the countryside and nature reserves.[see para 4.1]

The Adopted Part 1 Joint Local Babergh Mid Suffolk Local Plan section LP17 paras. 15.19 to 15.24 states *“The landscape and the historic environment have a strong inter-relationship, as the character of the landscape is influenced by its historic environment, as well as traditional villages and historic townscapes. Equally, the landscape can be important to the setting of a historic asset”*

Hadleigh’s historic setting in the landscape is an important element in determining its special character as a valley settlement with subsequent growth occurring on the gentle eastern slope to the River Brett. To safeguard and appreciate the landscape setting it is considered that the Neighbourhood Plan’s inclusion of a Landscape Character Assessment is fundamental to ensuring Hadleigh retains its sensitive relationship with its surrounding countryside. It is considered that the identification of an Area of Local Landscape Sensitivity (ALLS) as provided in the Neighbourhood Plan is a particularly important tool in protecting the area from harm to its character and the safeguarding of treasured views into and across the countryside.

In conclusion it is considered that the Policy should be retained unaltered.

**What improvements or modifications would you suggest?**

*Please be as brief and concise as possible ...*

*(Continue on separate sheet if necessary)*

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

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

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

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

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

*Please be as brief and concise as possible ...*

*(Continue on separate sheet if necessary)*

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

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

**Signed:**



**Dated: 3 JULY 2024**

*[PLEASE NOTE: This page has intentionally been left blank]*



## (17) RESIDENT – Llewelyn-Jones

### Consultation Response Form - Hadleigh Neighbourhood Plan 2023 - 2037

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

Hadleigh Town Council have prepared and submitted a draft neighbourhood plan to Babergh District Council which sets out a vision for their area and contains policies which they intend to be used to help determine planning applications within the designated area.

The submitted Plan etc. can be viewed online at: <https://www.babergh.gov.uk/hadleighNDP>

### 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:	Mrs Llewellyn-Jones
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

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

## Section Two: Your comment(s)

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

<b>Policy No.</b>	HAD1, HAD3,HAD4,HAD5,HAD7,HAD8,HAD9,HAD10,HAD11,HAD12
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**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>	X	<b>Oppose</b>	
<b>Support with modifications</b>		<b>Have Comments</b>	

<b>Please give details of your reasons for support / opposition, or make other comments here:</b>
<p>A thorough and remarkable effort has clearly been made in defining these policies (HAD2 and HAD6 also commendable and covered in 2 separate forms within my response) in support of our unique and well-loved Historical Market town. I fully support these policies and in particular I am very happy to see the inclusion and detail in HAD3, HAD4, HAD5, HAD7 and HAD8 as a vision to protect and enhance our treasured Green/Blue Spaces, our environment and wildlife and Low Carbon and Energy development.</p>

<b>What improvements or modifications would you suggest?</b>

## Section Two: Your comment(s)

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

<b>Paragraph No.</b>	4.15 figure 4.4	<b>Policy No.</b>	HAD2
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**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>		<b>Oppose</b>	
<b>Support with modifications</b>	X	<b>Have Comments</b>	

<b>Please give details of your reasons for support / opposition, or make other comments here:</b>
<p>HAD2 is vital in considering future development. I support HAD2 as it is vital in contributing to Hadleigh's character and in providing a sense of place. HAD2 has clearly been considered with great care.</p>

### What improvements or modifications would you suggest?

I would like to request an addition to HAD2 Landscape and Key Views; the view from the end of Hadleigh Holloway (Bridleway 11) where the hedgerow on either side comes to an end and you emerge at the crest of the hill into an open field. The criteria for Key Views is described as a view where people pause to take in a scene. This is naturally one such place and a lovely scene at the pinnacle of the walk at the end of the Holloway providing access to the countryside. People have commented on how their enjoyment of the walk has been enhanced knowing that it is ancient (Bacon Lane is outlined on the Non Designated Heritage Asset List). At the point where you emerge you are met with a magnificent view over to Kersey and Kersey Church Tower becomes visible - this view although partially covered by Key View E (photo provided in my email for reference) should be included as if housing was built on this land it would be a shame to emerge from the Holloway to no view at all. If developed in the future it would be a real loss for this view as part of the Holloway walking experience to disappear and is likely a view which has been enjoyed for centuries by people travelling to and from the neighbouring village of Kersey.



## Section Two: Your comment(s)

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

<b>Paragraph No.</b>	6.4, 6.1, 6.3 & Appendix A	<b>Policy No.</b>	HAD6
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**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>		<b>Oppose</b>	
<b>Support with modifications</b>	X	<b>Have Comments</b>	

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

HAD6 is vital to protect the non-designated Heritage Assets which contribute significantly to what makes the Historical Market town of Hadleigh so well loved.

HAD6 paragraph 6.4 references and provides a link to the full list of non-designated heritage assets of which there are 96. One of these assets is Bacon Lane which (also known as Bridleway11) has not been plotted in 6.1 or 6.3 and has been omitted in Appendix A which is incorrect. The Appendix A describes 95 entries when there are 96. This looks like a small oversight which needs to be corrected.

**What improvements or modifications would you suggest?**

Ensure Bacon Lane is correctly plotted and included on 6.1 and 6.3 and the Appendix is updated to correctly include Bacon Lane so that paragraph 6.4 makes sense.

## Section Two: Your comment(s)

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

<b>Paragraph No.</b>		<b>Policy No.</b>	HAD13
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**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>		<b>Oppose</b>	X
<b>Support with modifications</b>		<b>Have Comments</b>	

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

HAD13: I understand that HAD13 hasn't been assessed by working groups as part of the process as it was included in the Neighbourhood Plan after Regulation 14 had concluded. This is not acceptable and on the basis that if left as it is the Policy will have an unintended negative impact on future development in Hadleigh.

**What improvements or modifications would you suggest?**

Rewording of Policy HAD13.

HAD13 “Strategic Site allocations” is not clear and open to interpretation.

HAD13 Policy wording is not specific to the Hadleigh Neighbourhood plan area but refers to the whole of Babergh and Mid Suffolk Local Plan Part 2. This should not be the case.

HAD13 Policy appears to state it will be a prioritised element of any decision and does not take into account HAD1 and HAD2 which negates the whole point of including these policies in the Neighbourhood plan in the first instance. HAD1 and HAD2 capture the essence of what local people love about living in Hadliegh and it is vital HAD13 takes this into account in equal measure.

HAD13: Outdoor sports areas should be located in accordance with and considering HAD1 and HAD2 to preserve the Heritage and landscape and Key Views which make Haleigh so special. HAD13 left as it is will serve as an unintentional “loophole” which will enable developers to gain planning permission on larger scale development in Hadleigh simply by including sporting facilities in their application rather than correctly taking into consideration all other elements of the Neighbourhood Plan. HAD13 should be amended so that it does not allow a decision on housing to be made based on the provision of sporting facilities as the priority and should reflect and take into account the whole Neighbourhood Plan in entirety. It needs to be clear that infrastructure and services are a key consideration as they are essential for future quality of life; in short, the availability of Doctor Appointments and the capacity of educational facilities must be considered as additional housing should not make the current situation worse. If HAD13 is left as it is it could make the Neighbourhood Plan pointless as it will provide developers with an unintentional heavy and unfair advantage in achieving housing regardless of the essence of the Neighbourhood plan by giving priority in decision making to the provision of sporting facilities. My point is not to say sporting facilities provision be removed as it is a valid and important aspect of the Neighbourhood Plan but to merely to propose HAD13 be reworded. If left as it is, HAD13 is contradictory to the Vision Statement paragraph 3.19 and on this basis needs to be amended.

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

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

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

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

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

*Please be as brief and concise as possible ...*

*(Continue on separate sheet if necessary)*

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

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

<b>Signed</b> 	<b>Dated:05/07/2024</b>
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## (18) RESIDENT - Panton

**E from:** Mr Panton  
**Rec'd:** 3 July 2024  
**Subject:** Hadleigh NP Response

Dear Planners

Please find attached my response to the Hadleigh Neighbourhood Plan.

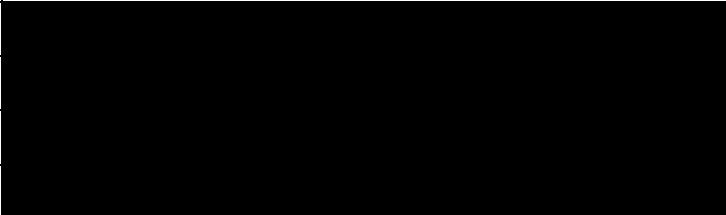
Also please look at para 5.27 (p43) where I think you will find that this was the woollen industry (unless bats for the cricket club!).

\* \* \* \* \*

### Consultation Response Form

#### Section One: Respondents Details

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

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

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

## Section Two: Your comment(s)

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

Paragraph No.	8.9	Policy No.	
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications	Y	Have Comments	

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

Need an action in relation to the need to improve public transport. 24% of people surveyed for Transport Study said it was a priority.

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

Improve the frequency of the service to Ipswich and consider restoring a service to Manningtree.

*(Continue on separate sheet if necessary)*

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

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

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

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

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

*Please be as brief and concise as possible ...*

*(Continue on separate sheet if necessary)*

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

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

Signed: XXXXXXXXXX

Dated: 3/7/2024



## (19) RESIDENT – Schleip

**Rec'd:** 3 July 2024

**Subject:** Hadleigh Neighbourhood Plan

I am a local resident of Hadleigh. I generally agree with the contents of the Hadleigh Neighbourhood Plan but I do have some specific comments and objections which I should like you to take account of.

I strongly support Policy HAD1 Design and Character and HAD2 Landscape and Key Views in regard to proposals for new building development and controlling the impact upon surrounding countryside. In particular the landscape on both sides of the road entering Hadleigh from Sudbury and the magnificent views from the [A]1071 and Castle Field across to Kersey Church from the historic footpath at the back of Castle Road, Hadleigh.

Other policies supported and which contribute positively to maintaining and supporting the special quality of the town are Policies HAD 4, 5, 6, 10, and 12 covering Green and Blue corridors and verges, Local Green Spaces, non-designated Heritage assets, access to the countryside and Hadleigh town centre.

It is recognised that other policies which contribute positively to greater well being of the population and support HAD 3, 7,8,9 and 11 dealing with biodiversity, wildlife friendly design, low carbon development, community energy, enhancing walking and cycling and co-housing schemes.

However not supported is H[A]D13 which undermines the other good intent of the plan.

Specific policy objections...

HAD [13] sport and leisure provision

Proposals to deliver strategic site allocations in the Babergh and Mid Suffolk Joint [Local] Plan part 2 should ensure that they address local need for new or expanded and enhanced sports, leisure and community facilities for all users, accessible to both existing and new residents particularly by walking or cycling. There should be informed engagement with local sports and community clubs and providers in the town of Hadleigh to establish existing and future needs and opportunities.

This policy was introduced into the Hadleigh Neighbourhood Plan following conclusion of the regulation 14 public consultation and did not benefit by the Neighbourhood Working Groups. from detailed consideration .

The policy seeks to extend itself beyond the area of the Neighbourhood Plan by addressing strategic site allocations across the whole Babergh Mid Suffolk Local Plan area

which is wrong. Paragraphs 10, 18 and an alternative policy adopted, the redrafted policy should be subject to further consultation.

#### ADDITIONAL GENERAL COMMENTS

Specific comments concerning the Character Assessment of Area1 Zone A Ann Beaumont Way, Bridge Street, Castle Rise, Woodlands and Gallows Hill

By far the biggest Road is excluded from the heading and stretches from the Hadleigh Bypass to Friars Road is Castle Road which covers the width of Castle Field. This should be corrected.

The Castle Road area is described as an estate which is incorrect. An estate by definition is an area consisting of a large number of houses or apartments built close together and at the same time. The Castle Road area contains properties built in the 1800's, 1960's, 70's, 80's, and 90's, with a development of 14 houses currently under construction. The density of houses is around 8 to the acre with many houses having plots of around .25 of an acre.

Whilst mentioned in the Local List, which is an Attachment to the Plan, there is no mention in the Character Assessment for Zone A of the historic Bacon Lane, which is a medieval hollow, recently given Monument status by Suffolk County Council.

Thank you for considering my views and I should be grateful if you would acknowledge receipt of my email.

[Ends]

**(20) Late Representation –  
Armstrong Rigg Planning (obo Hopkins Homes)**

**E from:** Geoff Armstrong, David Jones  
**Rec'd:** 8 July 2024 (8:42pm)  
**Subject:** Hadleigh Neighbourhood Plan  
**Attach:** Hadleigh NP Response Form / Landscape Visual Appraisal – July 2024

Dear Sir/Madam,

Please find attached our reps on behalf of Hopkins Homes

The same reps may have been submitted earlier today but I am submitting these in case they did not arrive

Kind regards,

Geoff Armstrong

\* \* \* \* \*

**E to:** David Jones  
**Cc:** Geoff Armstrong  
**Rec'd:** 8 July 2024 (14:32pm)  
**Subject:** RE: Hadleigh Neighbourhood Plan

Dear David,

*Firstly, we acknowledge receipt of the e-mail copied [above]. Thank you also again for your telephone call this morning.*

*To confirm, we will pass on your clients comments to the examiner of the Hadleigh N'hood Plan but, because these arrived after the 4:00pm deadline, they will be recorded as a 'late representation'. This approach is consistent with how we have treated similarly timed representations on other neighbourhood plans in the past.*

*Yours sincerely,*

*Paul Bryant  
Neighbourhood Planning Officer | Planning & Building Control  
Babergh & Mid Suffolk District Councils – Working Together*

## Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	MR GEOFF ARMSTRONG
Job Title (if applicable):	DIRECTOR
Organisation / Company (if applicable):	ARMSTRONG RIGG PLANNING
Address:	THE EXCHANGE COLWORTH SCIENCE PARK SHARNBROOK BEDFORD
Postcode:	MK4 1LZ
Tel No:	01234 867135
E-mail:	<a href="mailto:geoff.armstrong@arplanning.uk">geoff.armstrong@arplanning.uk</a>

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	HOPKINS HOMES LIMITED
Address:	MELTON PARK HOUSE 4 SCOTT LN MELTON WOODBIDGE
Postcode:	IP12 1TJ
Tel No:	C/O AGENT
E-mail:	C/O AGENT

## Section Two: Your comment(s)

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

<b>Paragraph No.</b>		<b>Policy No.</b>	HAD2
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**Do you support, oppose, or wish to comment on the above?** (Select one answer below)

<b>Support</b>		<b>Oppose</b>	X
<b>Support with modifications</b>		<b>Have Comments</b>	

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

Hopkins Homes are providing this consultation response in reply to the Hadleigh Neighbourhood Plan Regulation 14 Consultation by the requested submission deadline of 4pm on 5<sup>th</sup> July 2024.

Hopkins Homes Ltd is the largest independent house building company in East Anglia with a reputation for delivering well designed, high quality residential and mixed-use development harmonising with its local context. In the past decade the company has succeeded in delivering sustainable developments which improve neighbourhoods, improve local infrastructure and add to local distinctiveness throughout East Anglia.

These representations follow Hopkins Homes' previous comments to the Regulation 14 Consultation in December 2023.

### **Policy HAD2: Landscape and Key Views**

Policy HAD2 seeks to designate an extensive tract of land to the north, south and west of the town as an Area of Local Landscape Sensitivity (ALLS) which will be protected from development other than:

*"1. proposals affecting existing rural buildings, householder applications, or residential development that complies with one or more of the exceptional circumstances set out in paragraph 84 of the NPPF 2023; and*

*2. where available opportunities to deliver positive change (following the management recommendations Rural Character Areas HRCA1, 2, 3, 4 and 8) set out in the Hadleigh Landscape Assessment 2023 have been demonstrated through an assessment of landscape and visual impacts (proportionate to the scheme proposed); and*

*3. proposals affecting essential utility infrastructure."*

Part of the justification provided for this designation in the supporting text (paragraph 4.11) is that *"The 2006 Babergh Local Plan defined the rolling river valley to the west of Hadleigh as a 'Special Landscape Area' (SLA). The SLA designations were carried forward into the 2014 Babergh Local Plan but have not been carried forward into the Joint Local Plan."*

This justification ignores the important reason for not carrying the previous SLA designations forward in the Joint Local Plan Part 1 (JLP). That is, that such blanket restrictions on development do not accord with current National Planning Policy in the National Planning Policy Framework (NPPF). NPPF paragraph 180 seeks to protect and enhance valued landscapes and

therefore affords some protection from development that would not achieve this, but the NPPF does not seek to restrict almost all forms of development in valued landscapes in the same way as Policy HAD2. In fact, the NPPF at paragraph 183 allows development to come forwards in nationally designated landscapes (i.e. National Parks and Areas of Outstanding Natural Beauty) subject to restrictions on major development having to demonstrate exceptional circumstances in the public interest.

There is no suggestion that the area around Hadleigh is of a value commensurate with AONB designation and it is therefore inappropriate and contrary to national policy for the Neighbourhood Plan to seek to restrict almost all forms of development in this area. In fact, such is the level of restriction applied by Policy HAD2, that the proposed ALLS would be protected at a similar level to Local Green Space (LGS). In this respect, NPPF paragraph 106 is clear that LGS designations should not be applied to extensive tracts of land. Policy HAD2 is therefore contrary to national policy and does not meet the basic conditions.

In addition to the policy as a whole being contrary to national policy, Hopkins Homes, objects to the identified of their Land South of Hadleigh Bypass within the proposed ALLS designation. Submitted in support of these representations is a **Landscape and Visual Advice note prepared by IDP Landscape** which demonstrates that the Parish Council's case for the site be part of a protected designation is unfounded. The assessment does not account for the demonstrable factors of less than high value to the site immediately to the west of Castle Road. The characteristics of the landscape here are of moderate value only and are not considered to comprise a valued landscape. Our client's site is relatively unconstrained and would provide the opportunity to provide much needed housing in the town through promotion to the Local Plan Part 2, and should not be prohibited by the proposed designation in the Neighbourhood Plan.

*(Continue on separate sheet if necessary)*

### **What improvements or modifications would you suggest?**

Policy HAD2 should be amended to remove any reference to an Area of Local Landscape Sensitivity. The identification of such an extensive tract of land for protection from almost all forms of development is contrary to national policy and therefore fails to meet the basic conditions for Neighbourhood Plans.

Should the examiner disagree with our conclusions on the policy as a whole, the proposed area to be designated as ALLS should be reviewed and our client's land removed from the designation as it is demonstrably not of high landscape value.

*(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.**

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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 ...**

Hadleigh is the second largest town in the Babergh area and is therefore a key area for potential growth in the emerging Local Plan Part 2. The current Local Plan at the time of writing is the Babergh and Mid Suffolk Joint Local Plan Part 1 and was adopted in November 2023 by both Councils, but it defers the decision on the spatial distribution of new housing and site allocations to the emerging Local Plan Part 2. In this context, it is critical that the Neighbourhood Plan does not constrain the potential for the Local Plan Part 2 to meet the district's needs.

*(Continue on separate sheet if necessary)*


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

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

**Signed:** 

**Dated:** 05/07/2024

BRIEFING NOTE			
Project Number :	LA5506	Date :	03/07/2024
Project Name :	Land South of Hadleigh Bypass		
Client :	Jonathan Lieberman - Hopkins Homes		



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 COVENTRY CV1 3BA

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 E: info@idpgroup.com

www.weareidp.com

Landscape & Visual Advice – Reg 16 Consultation 2024

## 1.0 Introduction

- 1.1. IDP Landscape has been instructed by Hopkins Homes to produce a landscape and visual appraisal of the strategic site to the south of Hadleigh bypass as part of representations to the Local Authority. The site is located to the south of the bypass, to the north of Coram Street and to the west of existing development off Castle Road. The site is not allocated and falls outside of the existing settlement in the open countryside. Following the release of the submission draft Hadleigh Neighbourhood Plan (HNP) and the supporting evidence including a Landscape Character and Sensitivity Assessment (May 2023), the site has not been promoted within the HNP for housing. This note collates the baseline information we have currently gathered to inform the promotion of the site, and to provide a response to the Neighbourhood Plan submission draft.
  
- 1.2. The town as the second largest in the Babergh area is a key area for potential growth in the emerging Local Plan Part 2. The current Local Plan at the time of writing is the Babergh and Mid Suffolk Joint Local Plan Part 1 and was adopted in November 2023 by both Councils, but it defers the decision on the spatial distribution of new housing and site allocations to the emerging Local Plan Part 2. The online policies map indicates that the land to the west of Hadleigh is not designated for its landscape value or historic importance and is unconstrained in policy terms. The nearest designation is the Dedham Vale National Landscape (former AONB) that lies over 3km to the south.
  
- 1.3. Three public rights of way (PRoW) traverse the site, W-289/009/0 from Coram Street going directly north to link with W-289/010/0 that leads from Castle Road to the east to cross the A1071 at the northern boundary of the site. W-289/011/0 also merges with the other PRoW and links to the east to Gallows Hill.

## 2.0 Site Conditions



- 2.1. The site comprises of two large arable fields located within the existing road network and residential development to the east. The Hadleigh bypass is a major road forming the northern boundary with establishing vegetation to either side which encloses the majority of its route up to the PRow crossing point where views then open up to the surrounding landscape.
- 2.2. The eastern field is gently undulating and sits on a slight plateau which creates a level change to Castle Road and the existing properties that back onto the site. There is a drainage channel to the western edge of the field where the land drops down to create a shallow valley. The western field rises gently to the west and affords open views to and from the wider landscape and is featureless as a single agricultural field.



Site location plan

- 2.3. There are no listed buildings or heritage assets within the site, although the listed wall of the Castle is located outside the eastern boundary in a residential garden. The listed cemetery lodge and Priors Farm farmhouse lie to the south of Coram Street. The Hadleigh Conservation Area covers the cricket club just to the southeast and the town beyond. A number of Figures were produced to support the promotion of the site to the Local Plan and these are appended to this note. Figure 1 shows the site in context and Figure 2 provides the constraints.

### **3.0 Landscape Character**

- 3.1. Figure 3 illustrates the Landscape Character Areas informed by the Suffolk Landscape Character Assessment (updated 2011), with the site located to the edge of LCA 4 'Ancient Rolling Farmlands'. This is a rolling clayland landscape of arable fields and hedgerow boundaries and ditches. The rolling landscape is dissected widely, and sometimes deeply, by river valleys, and substantial open areas exist created for airfields and by post-war agricultural improvement. LCA 18 'Rolling Valley Farmlands' occupy land to the north of Hadleigh and are gentle valley sides with loamy soils and small to medium sized field patterns. The spatial character of this landscape to the adjacent valley floor means that change can have a profound visual impact.
- 3.2. The published landscape character assessment is comprehensive and follows Natural England guidance in the methods and characterisation that it makes in terms of the local landscape and the key components that make up the broadly homogenous zones.

#### **4.0 Visual Environment**

- 4.1. The description in the Suffolk LCA for the Ancient Rolling Farmlands under visual experience states that:
- "This area has a network of winding lanes and paths often associated with hedges that, together with the rolling countryside, can give a feeling of intimacy. However, the areas of field amalgamation have also created longer views of a rolling lightly wooded countryside".*
- 4.2. The site is located in an area of broadly regular field patterns with some hedgerow boundaries and scattered woodland, but views can extend to medium to long distance where topography allows. Figure 4 illustrates the rolling landscape and the presence of local ridgelines where longer distance views would be available. The church in Kersey to the northwest is particularly prominent.
- 4.3. Views from local footpaths are contrasting with some areas enclosed by hedgerows and trees, and others where the landscape structure is weaker and open views are vast. There is a broad plateau to the eastern part of the site with a small incision in the topography which splits this from the land to the west. This creates a more visually sensitive part of the site which is visually detached from the east and forms part of the slope up to the ridgeline to the southwest. Views from the north observe the A1071 and the verge planting which largely screens views of the town and the eastern part of the

site.

## **5.0 Response to the Neighbourhood Plan**

- 5.1. The Regulation 16 Hadleigh Neighbourhood Plan submission version draft was published in February 2024, supported by a Landscape Character and Sensitivity Assessment (May 2023) produced by Lucy Batchelor-Wylam CMLI. The assessment was to inform the development of the Plan by understanding the landscape and visual sensitivities and whether areas fall under the criteria of a 'Valued' landscape as defined under the NPPF.
- 5.2. The Landscape institute have produced a technical guidance note TGN 02/21 'Assessing Landscape Value outside National Designations' which provides tools to enable practitioners to make judgements regarding landscape value. The report carried out by Neighbourhood Plan adheres to this guidance and makes judgements as to the factors that determine value, and whether the rural character areas that they identified fall under a valued landscape criteria.
- 5.3. According to the assessment, the site lies in the Hadleigh rural character area HRCA 4 (Coram Street) to the west of the town and includes land to the north and south of the bypass. The assessment acknowledges that the area was included in the previous Local Plan as a 'Special Landscape Area' policy but that this has not been carried forward into the new Joint Local Plan. The assessment goes on to state on page 53 that:  
*"Development in this area would have a poor visual relationship with the rest of the town, would feel disjointed and separate, and would draw Hadleigh into a new and different part of the valley, and be visible from long distances."*
- 5.4. The area in HRCA 4 centres over the shallow valley of a tributary stream that flows north from Friars Hill to join the channel of the Brett at Stone Street (HRCA5). This zone extends beyond the site and is broadly reflective of the rolling farmland character where the sense of openness increases outside of the existing settlement.
- 5.5. Despite the assertion of a rolling and open landscape, the eastern part of the site abutting the existing edge of the town is relatively flat and enclosed to three sides. The western boundary drops away to the ditch and hedge that splits the wider site into two parcels. Whilst the site is currently open on this boundary, there is variation in the visual

experience across the site, and there lies the opportunity to reinforce the tree and hedgerow cover and field structure by linking the tree planting on the southern boundary up to Friars Farm House with the vegetation alongside the A1071 to the north. The Guidance Note that accompanies LCA 4 'Ancient Rolling Farmlands' recommends that extensive planting schemes can help to mitigate the impact of new developments and provide a positive long-term legacy, and this would effectively screen the urban edge in wider views.

- 5.6. This has been explored in the development opportunities that Hopkins Homes have put forward (see Appendix 2) through the analysis of the landscape and visual environment and exploring the urban pattern to the west of Hadleigh. This would effectively round-off the settlement and provide significant green infrastructure to the urban edge. It is also in keeping with the commentary in the HNP Landscape Appraisal for HRCA4 which states: *“Condition of the landscape would be improved with reinstatement of farm hedges and boundary trees to reduce the somewhat denuded feel of some parts of the landscape. Visually and ecologically this would have particularly positive impact along the course of the seasonally dry small watercourse and where the woodlands can be connected into continuous hedge networks.”*
- 5.7. Therefore, mitigation for the potential visual impacts as a result of development in this manner would be effective and provide a robust landscape structure within which new development could sit. The findings of the Neighbourhood Plan landscape assessment are not consistent and are overly prohibitive to development. The issues/ pressures/ detractors that have been referenced regarding HRCA4 are unfounded and do not apply to the eastern part of the site where development could potentially be accommodated without significant harm in the long-term.
- 5.8. In addition, the promotion of an Area of Greater Landscape Value (AGLV) is advocated in the assessment based on the criteria for a 'valued' landscape as defined by TGN 02/21. Analysis of each of the criteria has been carried out as a whole, but aren't necessarily relevant to the site and it is not therefore deemed appropriate as a valued landscape. In terms of the site for development, the following assessment is relevant:
1. Natural heritage – there is very few landscape or ecology features on the site that contribute to this element

2. Cultural heritage – there are some peripheral heritage assets although their importance is limited to the structure rather than their wider setting.
3. Landscape condition – the site is one large arable field and weak boundary treatments, affected by agricultural intensification.
4. Associations – none of note on the site.
5. Distinctiveness – the topography is distinctive of the landscape with the backdrop of trees. Further west the topography is more rolling and allows long views across to Kersey.
6. Recreational – public rights of way traverse the site and provide opportunities to experience the landscape and outdoor recreation.
7. Perceptual/ scenic – the ancient patterns of the farmland in this part of the character area have been eroded away but the perceptual qualities of the open farmed landscape are present on the site and increase further to the west.
8. Wildness and Tranquillity – this is eroded to some extent by the bypass and proximity to the existing urban edge, but this quickly dissipates away from the settlement.
9. Functional – the site does not perform a functional role in the landscape in terms of natural systems, although the footpath networks provide functional links with the wider landscape.

5.9. These factors in respect of the site for potential development are not shared with the wider landscape further to the west. Given the review of each of the factors above, the site seems to lie more in the moderate bracket and does not have sufficient qualities to elevate it above more ‘everyday landscapes’ as stated in the TGN 02/21.

5.10. Therefore it is not considered appropriate that a blanket designation is required to protect a highly sensitive landscape from harmful development as the HNP document is attempting to do.

5.11. Policy HAD2 in the draft Neighbourhood Plan states that Key views should be preserved. These have been identified through the character assessment and are “*views that would be generally recognised as having notable qualities or a particularly attractive composition that might cause people to pause and appreciate the scene*”. In total, 16 key views were identified which are held in high public regard and demonstrate particular qualities or features. However, despite the assertions that the site is highly visible and very sensitive, there is only one view identified which is located where the public

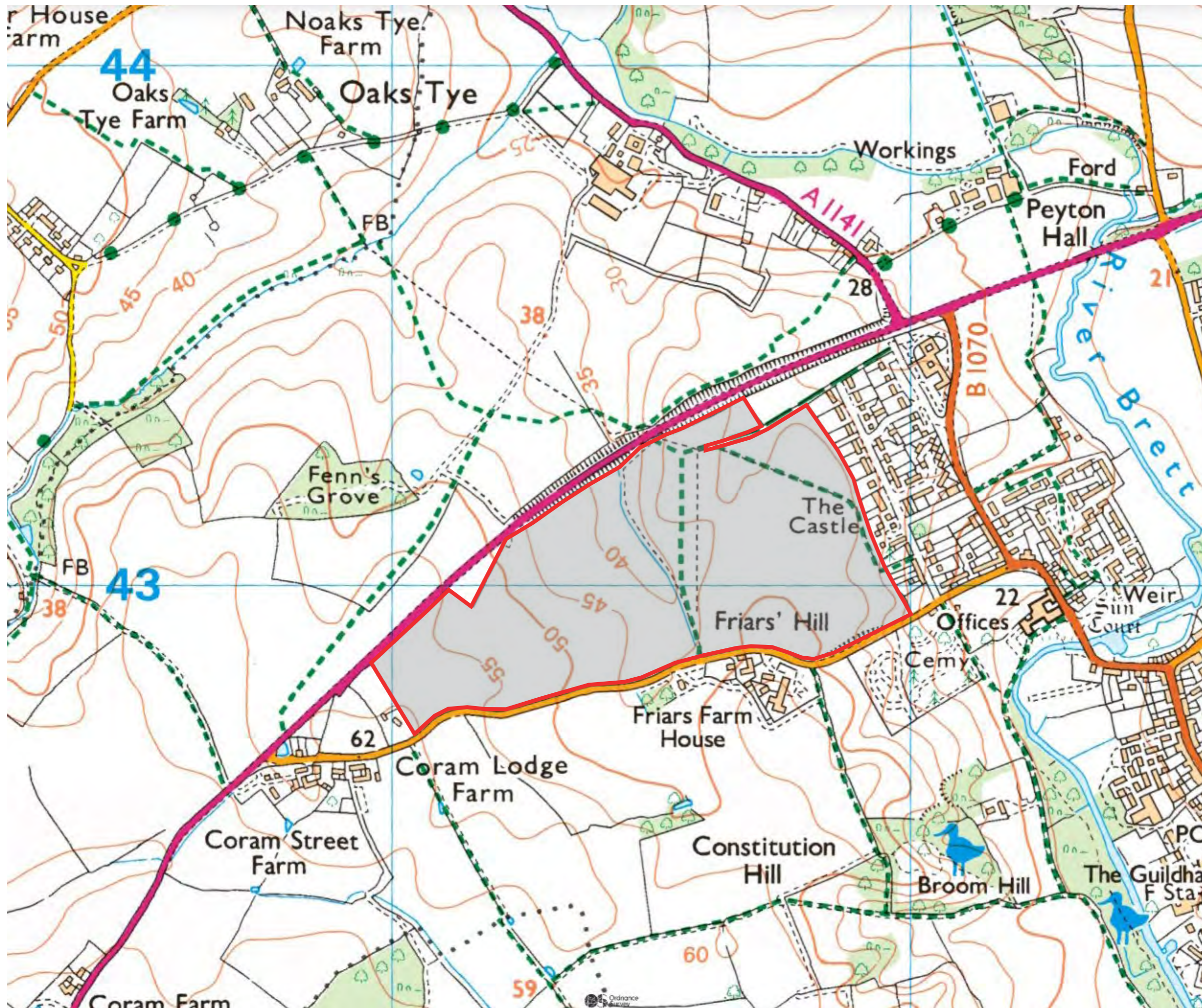
footpath emerges from the residential estate to the eastern boundary of the site. No other key views are recognized in the assessment, and therefore it is highly unjustifiable to characterise this part of the town as being visually prominent in views from the wider landscape.

## **6.0 Conclusion**

- 6.1. In summary, the Parish Council's case that the site be part of a protected designation of an Area of Greater Landscape Value is unfounded. Whilst the approach taken within the Hadleigh Landscape Character and Sensitivity Assessment follows appropriate guidance for such assessments, it does not account for the demonstrable factors of less than high value to the site immediately to the west of Castle Road. The characteristics of the landscape here are of moderate value and have a higher recreational value due to the presence of 3 public rights of way. The topography creates a relatively flat site which is enclosed to three sides, and the western boundary drops away to the ditch and hedge that splits the wider site into two parcels. New hedge and tree planting along this boundary provide the opportunity to create a new settlement edge and reinforce the existing field structure by linking vegetation in the north and south.
  
- 6.2. The site is relatively unconstrained and would provide the opportunity to provide much needed housing in the town through promotion to the Local Plan Part 2, and should not be prohibited by the proposed designation in the Neighbourhood Plan.

## **Appendix 1**

Figure 1	Site Location Plan
Figure 2	Site Constraints Plan
Figure 3	Landscape Character Areas
Figure 4	Landscape Analysis



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All dimensions to be checked on site and landscape architect notified of any discrepancies prior to commencement.  
Do not scale

Notes.

Key

 Site boundary

Rev: date: comment(s) name: check:



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PROJECT MANAGERS.  
LANDSCAPE ARCHITECTS.  
**WE ARE IDP.**

### IDP LANDSCAPE

Client: Hopkins Homes Ltd

Job: Land South of Hadleigh Bypass

Title: Site Location Plan

Drawn: FL Date: March 2022

Checked: KC Scale @ A3: nts

Job no: LA5506 Drg no: Figure 1

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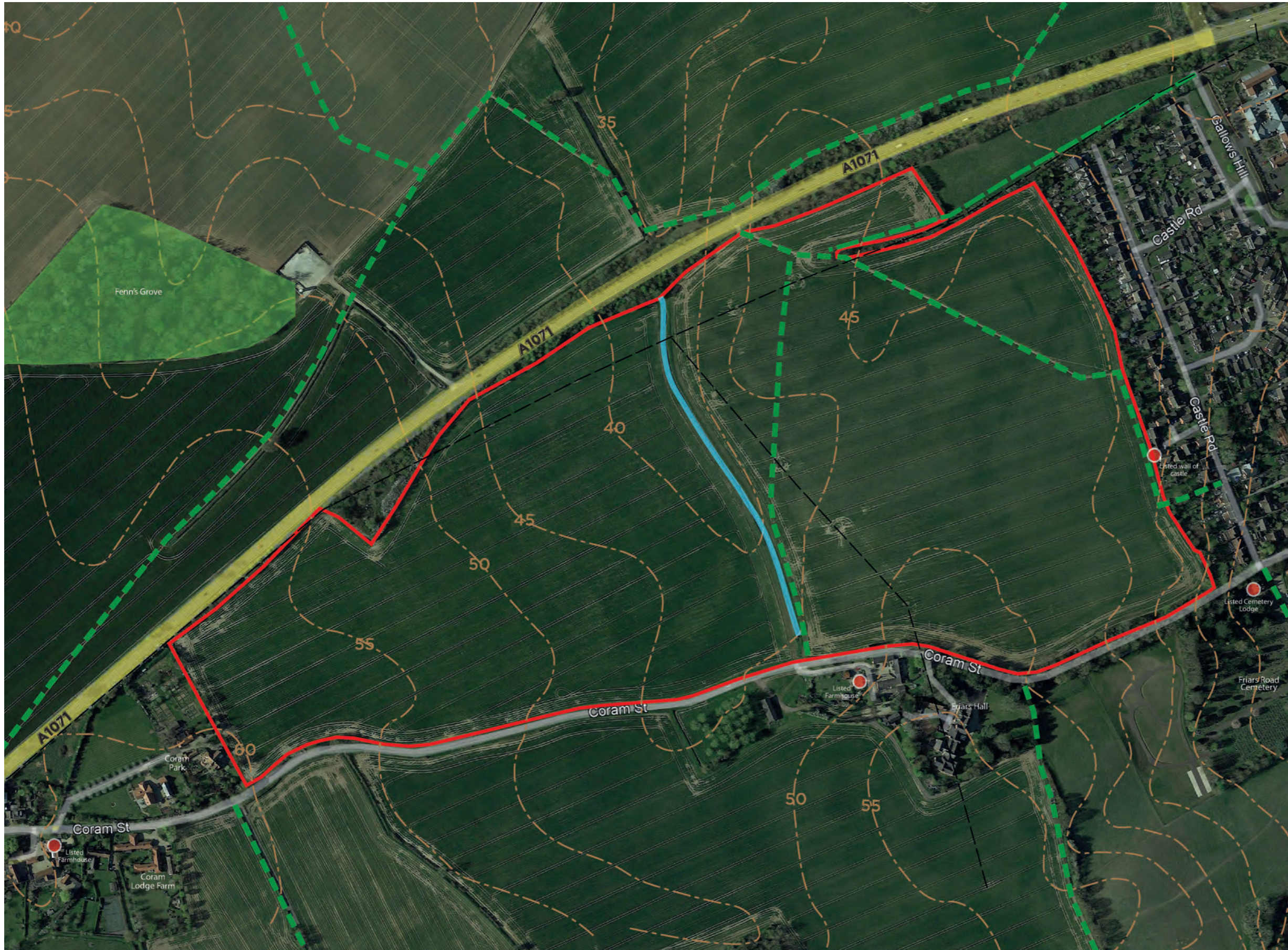
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Notes.

Key

- Site boundary
- - - Public right of way
- - - Public Bridleway
- - - Land contours
- A1071 Main Road Corridor
- Deciduous Woodland
- Grade II listed building
- Overhead Electric Cable
- Drainage Channel



Rev: date: comment(s) name: check:

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## IDP LANDSCAPE

Client: Hopkins Homes Ltd

Job: Land South of Hadleigh Bypass

Title: Site Constraints Plan

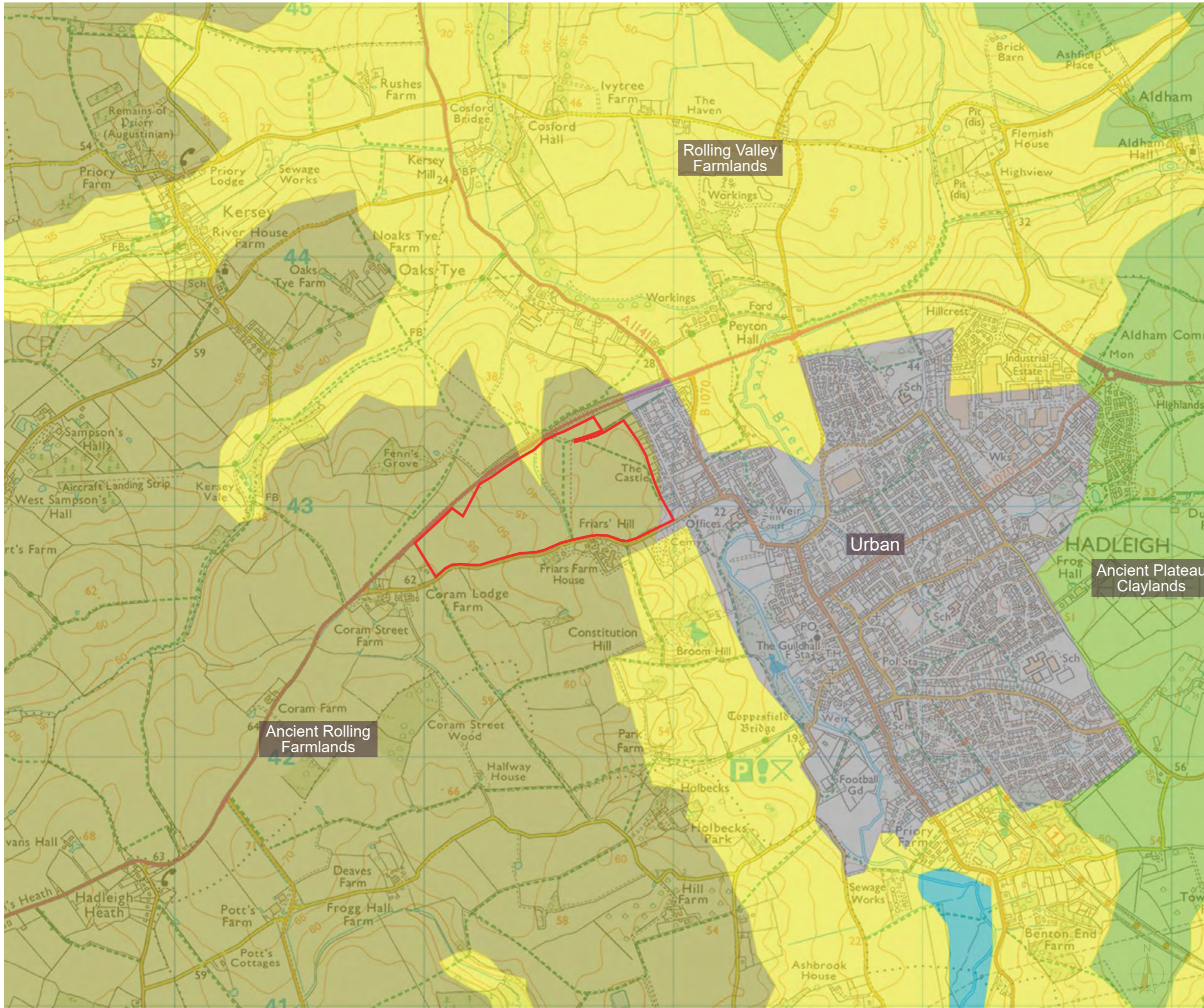
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Checked: KC Scale @ A3: nts

Job no: LA5506 Drg no: Figure 2

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**Notes.**

**Key**

 Site boundary

**Suffolk Landscape Character Areas**

-  Urban Areas
-  3. Ancient Plateau Claylands
-  4. Ancient Rolling Farmlands
-  18. Rolling Valley Farmlands

Rev: date: comment(s) name: check:

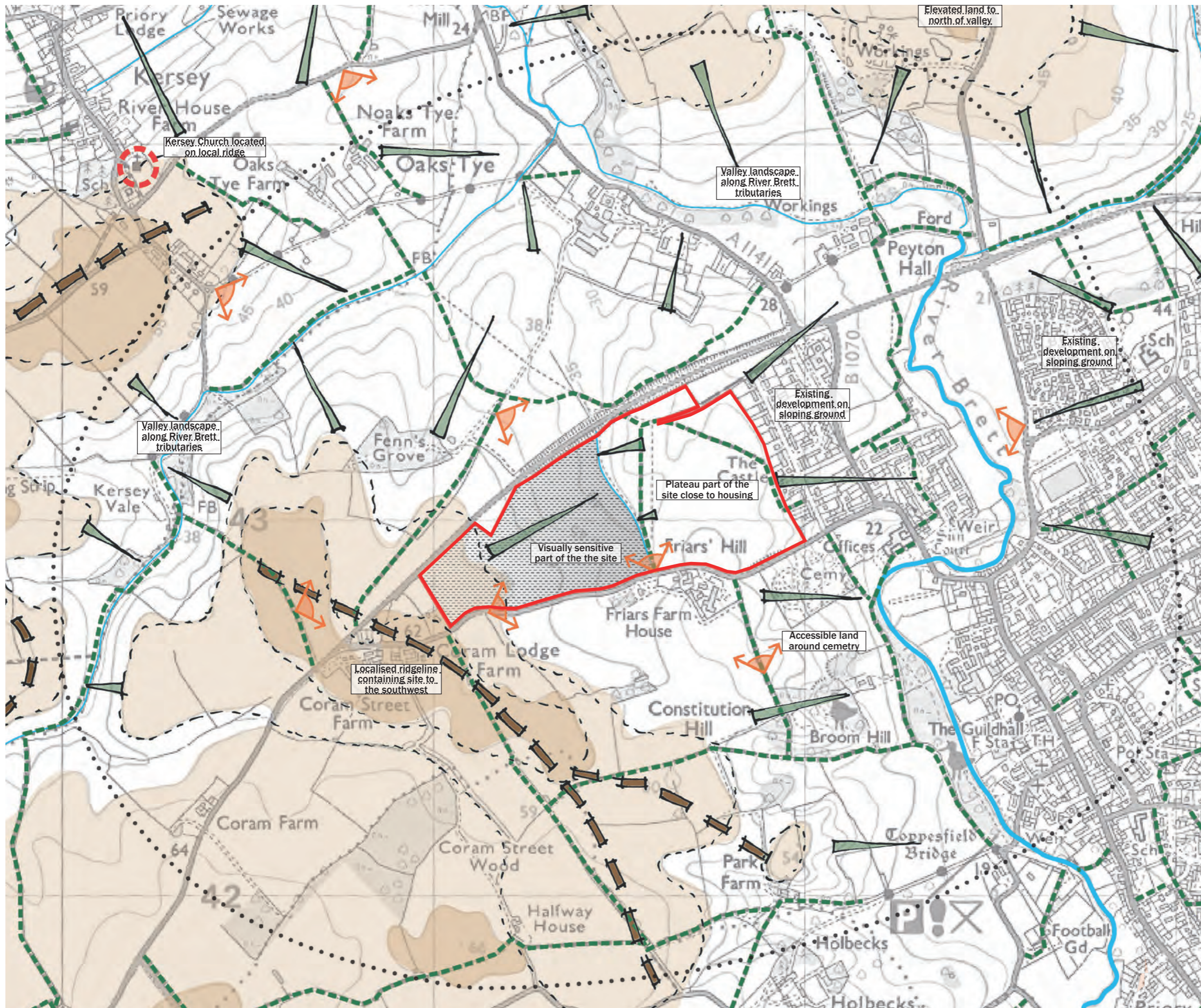


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**IDP LANDSCAPE**

Client: Hopkins Homes Ltd  
Job: Land South of Hadleigh Bypass  
Title: Landscape Character Areas  
Drawn: FL Date: March 2022  
Checked: KC Scale @ A3: nts  
Job no: LA5506 Drg no: Figure 3

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All dimensions to be checked on site and landscape architect notified of any discrepancies prior to commencement.

Do not scale

Notes.

Key

- Site Boundary
- Public Footpaths
- Watercourses
- Local ridgelines
- ▲ Local gradients
- Focal building
- ↗ Viewpoints

Rev: date: comment(s) name: check:

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## IDP LANDSCAPE

Client: Hopkins Homes Ltd

Job: Land South of Hadleigh Bypass

Title: Landscape Analysis

Drawn: FL Date: March 2022

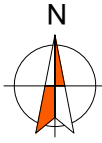
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Job no: LA5506 Drg no: Figure 4

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## **Appendix 2**

Hopkins Homes Illustrative Masterplan















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all dimensions to be checked on site and architect notified of any discrepancies prior to commencement. do not scale.

any and all elements relating to the fire safety of the building will require separate confirmation and approval by a fully accredited fire engineering consultant who has to be appointed by the Client.

notes:

-  Site Boundary
-  Site Entrance
-  Existing PRoW retained throughout site
-  Primary vehicular route
-  Emergency access
-  Central POS within development
-  Existing vegetation
-  Proposed woodland planting
-  Proposed tree planting
-  Proposed informal paths
-  Proposed development parcels
-  Proposed active frontages
-  Key corners

Existing PRoW

New access point on A1071

Woodland buffer to incorporate informal footpaths and trails

Informal planting to create soft edge to new development edge

Existing drainage channel to edge of site

Proposed 'Country Park' to new urban edge with footpath / cycle connections



Existing PRoW

Existing PRoW

Existing woodland buffer

Potential link across Coram Street to existing PRoW

**DRAFT**

A	01.12.22	Northern context updated	JG	CBM
rev:	date:	comment(s):	name:	check:



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status: **PRELIMINARY** RIBA Stage: 1

client: Hopkins Homes

job: Land South of Hadleigh Bypass

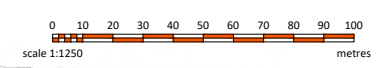
title: Illustrative Masterplan

drawn: JG date: 07.10.22

checked: KC scale @ a1: 1:1250

job no: LA5506 drg no: 102\_00 Rev A

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## (21) Late representation - Environment Agency



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

**Our ref:** AE/2024/129524/01-L01  
**Your ref:** Regulation 16 Consultation  
**Date:** 08 July 2024

Dear Paul

### **HADLEIGH NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION**

#### **HADLEIGH**

Thank you for consulting us on the pre-submission plan for the Hadleigh Neighbourhood Plan.

For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.

A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan.

#### **Environmental Constraints**

We have identified that the Neighbourhood Plan Area will be affected by the following environmental constraints:

#### **Flood Risk**

Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within

the neighbourhood plan area along the River Brett.

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

## **Water Resources**

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

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

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

## **Contaminated Land**

For land that may have been affected by contamination as a result of its previous use or that of the surrounding land, sufficient information should be provided with any planning application to satisfy the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk Assessment



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

### **Informatives**

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: [How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning](#)

### **Source Protection Zones**

Your plan includes areas which are located on Source Protection Zones 2 and 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: <https://www.gov.uk/government/collections/groundwater-protection>

### **Biodiversity Net Gain**

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

We trust this advice is useful.

Yours sincerely

**Mr Andrew Thornton**  
**Planning Advisor**

Direct dial: +44 20 3025 3127

Mobile: 07826434908

Direct e-mail: [andrew.thornton@environment-agency.gov.uk](mailto:andrew.thornton@environment-agency.gov.uk)

Team e-mail: [Planning.EastAnglia@environment-agency.gov.uk](mailto:Planning.EastAnglia@environment-agency.gov.uk)

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## (22) HADLEIGH TOWN COUNCIL

**E from:** Hadleigh Town Council

**Rec'd:** 17 July 2024

**Subject:** Response to Hadleigh NP R16 consultation reps

Good afternoon Paul,

After discussing responses with the Town Clerk, we have the following response per representation to the Regulation 16 consultation. Please be kind enough to pass on to Ann.

1. The QB are very happy to amend the wording to policy HAD1 to include the suggestions by **Suffolk County Council** and the addition of a new HAD13 policy as recommended, in line with NPPF chapter 14.
2. Re the comments from **Babergh District Council** ...  
Chapter 1 suggestions would be gladly incorporated.  
Chapter 4 suggestions would be gladly incorporated.  
Chapter 5 suggestions:  
Policy HAD4 (A) - it should indeed read Figure 5.2 and should be updated accordingly.  
Policy HAD5 - we remain of the view they should remain as is so that the car park and leisure centre are not encroached or sold for housing  
Figure 5.3 - we don't believe there would be confusion, page 57 is simply a zoomed in version of page 56 and, which gives the overall context to the rest of the parish and surrounding area so both seem appropriate to keep in our view.  
Chapter 6 suggestions, noted.  
Chapter 8 - we would be happy to include an appendix linked to HAD9 (A) of paragraph 8.4 of the BDC Transport Study, if the examiner thinks it appropriate.  
  
Supporting documents and the NPPF - we will request the authors of those documents to update.
3. We thank **Layham Parish Council** for taking the time to read the Hadleigh Neighbourhood Plan and have no further comments on their response.
4. We thank **Historic England** for their response and have no further comment to make.

5. We thank **Natural England** for their response and have no further comment to make.
6. We thank **Suffolk Wildlife Trust** for their response and support, and have no further comment to make.
7. We thank **Anglian Water** for their response and support, and have no further comment to make.
8. We thank **National Grid** for their response and have no further comment to make.
9. We thank **National Highways** for their response and have no further comment to make.
10. We thank the **DIO (obo MOD)** for their response and have no further comment to make.
11. We thank **Sport England** for their response and have no further comment to make.
12. We thank **Hadleigh Society** for their response and support, and in comment to the suggested modification, the Hadleigh NP group (which includes the Chair of Hadleigh Society, Richard Fletcher - also see representation 16) workshopped that policy in great detail, with a consultant and the majority vote (all in favour bar one) was for it to be per the regulation 16 submission so we remain content that it does not need modifying. The appendix A drafting issue is dealt with under the BDC submission comment above.
13. We thanks the Pegasus Group for their response.  
  
Policy HAD2 (B) we agree with the suggestion for use of "or" rather than "and" to make more sense.  
  
HAD2 (B) suggested wording amendment agreed would improve the policy.  
  
HAD3 (B) suggested is noted but remains for Hadleigh as is. This is supporting by BDC and the Suffolk Wildlife Trust.
14. We thank **Mr Beggerow** for their response and have no further comment to make.
15. We thank **Mr/s Clements** for their response and have no further comment to make, per representation 12 points above.
16. We thank **Mr Fletcher** for their response and have no further comment to make.
17. We thank **Mrs Llewlyn-Jones** for their response and have no further comment to make , per representation 12 points above.

18. We thank **Mr Panton** for their response and have no further comment to make as modifications to include specific bus routes falls outside the remit of the Neighbourhood plan.
19. We thank **Mrs Schleip** for their response and have no further comment to make, per representation 12 points above.
20. The QB does not wish to comment on **response 20** [Armstrong Rigg Planning] as it was a late submission and refers to being a regulation 14 response in its opening paragraph. It also repeats the response per regulation 14 to which our comments remains constant (see consultation statement). The people of Hadleigh voted and put forward the ideas for the landscape views and what they find important therefore it is demonstrably valuable to them.
21. The QB does not have a comment on **response 21** [Environment Agency] as it was a late submission and requires no further comment.

Kind regards,

Alicja Barnes

For / obo Hadleigh Town Council