

Babergh District Council

Lawshall Neighbourhood Plan Review 2021 - 2037

Reg 16 Submission consultation responses



In June 2023, Lawshall Parish Council (the 'qualifying body') submitted a modification draft of their Neighbourhood Plan (the Lawshall NP Review) to Babergh District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Wednesday 2 August to Friday 15 September 2023.

Eleven representations were received. These are listed below and copies are attached.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Babergh District Council
(3)	Natural England
(4)	Historic England
(5)	Anglian Water
(6)	Marine Management Organisation
(7)	Water Management Alliance
(8)	Suffolk Wildlife Trust
(9)	Defence Infrastructure Organisation (obo the Ministry of Defence)
(10)	Resident – Livall
(11)	Resident - Squirrell

A representation was also received from National Highways. Because its content referred to policies in a different neighbourhood plan it was rejected. National Highways were contacted immediately and given the opportunity to re-submit their representation, but none was forthcoming.

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(1) SUFFOLK COUNTY COUNCIL

Date: 14th September 2023
Enquiries to: Georgia Teague
Tel: 01473 265054
Email: georgia.teague@suffolk.gov.uk
neighbourhoodplanning@suffolk.gov.uk



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

Dear Mr Bryant,

Submission Consultation version of the Lawshall Neighbourhood Plan

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

We note that this consultation was already underway when the 2023 version of the NPPF was released. All references to the NPPF in this letter are to the 2023 version of the NPPF.

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~~.

Meeting the needs of an ageing population

Whilst SCC acknowledges that the Ministerial Statement 2015, as referenced in the Consultation Statement, states that neighbourhood plans should not set additional technical standards; SCC was not proposing that the plan should impose a requirement for M4(2). SCC recommends that the plan set out a positive position towards proposals that contain homes built to those standards.

This will help the plan meet the needs of a wider range of groups including older and vulnerable people, reflecting paragraph 61 of the NPPF.

Therefore, SCC would recommend that Policy LWL3 Housing Mix be amended as follows:

Planning proposals will be supported where development provides a mix of housing types and sizes that reflects the needs of local people, particularly in the need for 1 and 2 bedroom dwellings for first time buyers as well as the needs of an ageing population looking to downsize into homes suitable for lifetime occupation, *with particular support for accessible and adaptable housing built to M4(2) standard.*

Local Green Spaces

SCC notes that as part of the Reg14 Pre-Submission consultation, the supporting document detailing the justification for Local Green Spaces was not available.

Now that the document is available, SCC has reviewed the proposed Local Green Spaces. There are concerns that the parish council has not suitably explained how some of the proposed sites meet the criteria of being “demonstrably special” to the community, as stipulated under paragraph 102, part b), of the NPPF.

In particular, from a desk-based assessment, the following sites appear to be highway verges and SCC does not believe that they are demonstrated to be special to the community:

- LGS 7 Harrow Green
- LGS 8 Hanningfield Green (westerly side)
- LGS 9 Hibbs Green

Design Considerations

As part of the Pre-Submission consultation, SCC raised that parts G-I of Policy LWL16 Design Considerations (now Policy LWL15 in Reg16 version of the plan) should be in line with the Suffolk Design Streets Guide.

SCC would recommend that the Suffolk Design Streets Guide be referenced in the explanatory text of the plan, as it contains the principles SCC Highways use to assess planning applications. It is suggested that this be added after paragraph 9.7 of the plan.

Paragraph 134 of the NPPF states that: “Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.”

This additional reference should be included to ensure that any applications submitted in the future are in line with this guidance. Planning applications are considered and assessed in accordance with the guide. Any applications submitted that are not in line with the Suffolk Design Streets Guide are likely to be objected to by SCC Highways officers, and risk being refused.

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

Yours sincerely,

Georgia Teague
Planning Officer
Growth, Highways, and Infrastructure

(2) BABERGH DISTRICT COUNCIL

Our ref: Lawshall NP Review R16 response
Dated: 15 September 2023

From: Planning Policy Team, B&MSDC
To: Ann Skippers (Independent Examiner)
cc: *Lawshall Parish Council and Ian Poole (NP Consultant)*

Dear Ann,

Reg 16 submission draft Lawshall Neighbourhood Plan Review 2021 - 2037 Representation from Babergh District Council

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

The Lawshall Neighbourhood Plan Review (the 'LNP Review') seeks to bring the adopted Lawshall Neighbourhood Plan (October 2017) up to date. We note that it retains all but a few policies and that it takes the opportunity to bring these up to date. There are also seven new policies which provide general planning guidance. The various changes mean that the LNP Review now sets out twenty-two policies covering a broad range of topics, compared to the original sixteen.

We made a number of comments on the pre-submission draft LNP Review document (November 2022). They focused primarily on matters of general consistency. Changes have been made to the submission draft Plan in response to our and other consultee comments but, in carrying out this review, we note that inconsistencies remain and others have since become apparent. Our observations are set out on the following pages.

Finally, we have recently seen the Government publish an update to the National Planning Policy Framework (the NPPF). It is our opinion that this update, which focuses on national policy for onshore wind, does not directly apply to the LNP Review document and that no additional consultation is necessary. Where the LNP Review does refer to the NPPF - e.g., at para 1.7[ii], and in the opening paragraphs of Chapter 3 - it might be helpful if the Parish Council either update the text accordingly or add a footnote to acknowledge the NPPF update.

We trust that our comments are helpful, we await the Parish Council's response where prompted, and would be happy to answer any further questions you may have.

Yours sincerely

Paul Bryant
Neighbourhood Planning Officer | Planning & Building Control
Babergh & Mid Suffolk District Councils – Working Together
T: 01449 724771 / 07860 829547
E: paul.bryant@baberghmidsuffolk.gov.uk or communityplanning@baberghmidsuffolk.gov.uk



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

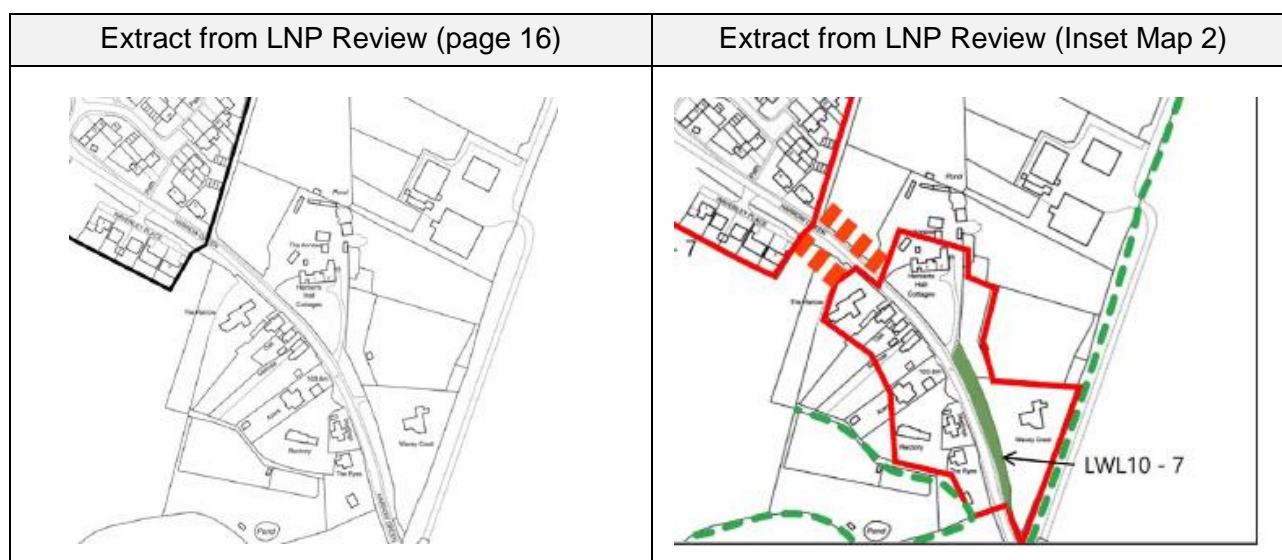
Comments on submission draft Lawshall Neighbourhood Plan 2021 - 2037 Review

Chapter 1 (Para 1.15)

The last sentence in paragraph 1.15 states that the timeframe for completing the new Joint Local Plan is unclear. We provided alternate text in our Reg 14 response [see Consultation Statement page 64 (PDF page 65)] but see that this has not been used. It is possible that a further update will be made public before the examination of this Plan is complete so, with your permission, we suggest that the Parish and District Council could agree and implement some appropriate wording.

Chapter 5 – Planning Strategy

In the Lambs Lane / Harrow Green Settlement Boundary map shown at the bottom of page 16 the boundary around Harrow Green is missing. This is presumably a drafting error but perhaps the Parish Council could confirm this.



LWL 9 – Protection of Important Views

This policy is supported by a new 'Assessment of Views' document. This was not available at the pre-submission stage but was subsequently submitted alongside the Plan. Within this, there appear to be some production issues:

- **View 21** (page 24) repeats the map, text and image from View 19.
- **View 22** (page 25) seems to show the map associated with View 17 but at a different scale.

In both cases, we ask the Parish Council to provide the correct information.

Turning now to **View 15** (View north from gateway in The Street to Frithy Wood SSSI), while this is included in the Assessment document, the view is missing from the relevant map on page 11 of the Character Appraisal. The two documents should complement each other, not contradict.

LWL 10 – Local Green Spaces

This policy is also supported by a new ‘Local Green Space Appraisal’ that was not available at the pre-submission stage but was subsequently submitted alongside this Plan. Having reviewed the Appraisal, and compared the maps in this with the Policy Insert Maps in the submission draft Plan we note the following:

LGS 1: Foundry Meadow

- This is still labelled as LWL 10 - 10 on Policy Inset Map 1. It should read LWL 10 - 1
- It is our understanding that the pond adjacent to Bury Road formed part of the LGS designation dating back to adopted Policy LAW 6. It has certainly been mapped as such. The relevant map in the LGS Appraisal now excludes the pond area. This is presumably a drafting error but we ask the Parish Council to confirm which mapped LGS area is now correct ... the one shown on Inset Map 1, or the one shown in the LGS Appraisal?
- Finally, a retrospective thought. To be consistent with the approach taken in other neighbourhood plans and with, for example, the Churchyard designation (LWL 10 - 15), we now suggest that the Green Light Trust building and adjacent car parking area be removed from the LGS designation, i.e., be separated out on the relevant maps.

LGS 4: Hall Mead Open Space

- The original designation only applied to part of the amenity space serving the residents of Hall Mead. The same rectangular area is still shown as such in the LGS Appraisal. However, Policy Inset Map 3 now includes all of the grassed area fronting Hall Mead. As above, can the Parish Council please confirm which mapped LGS area should be used going forwards.

LGS 8: Hanningfield Green

- This is still labelled up as LWL 10 - 6 on Inset Map 4. It should read LWL 10 – 8.

LGS 9: Hibbs Green

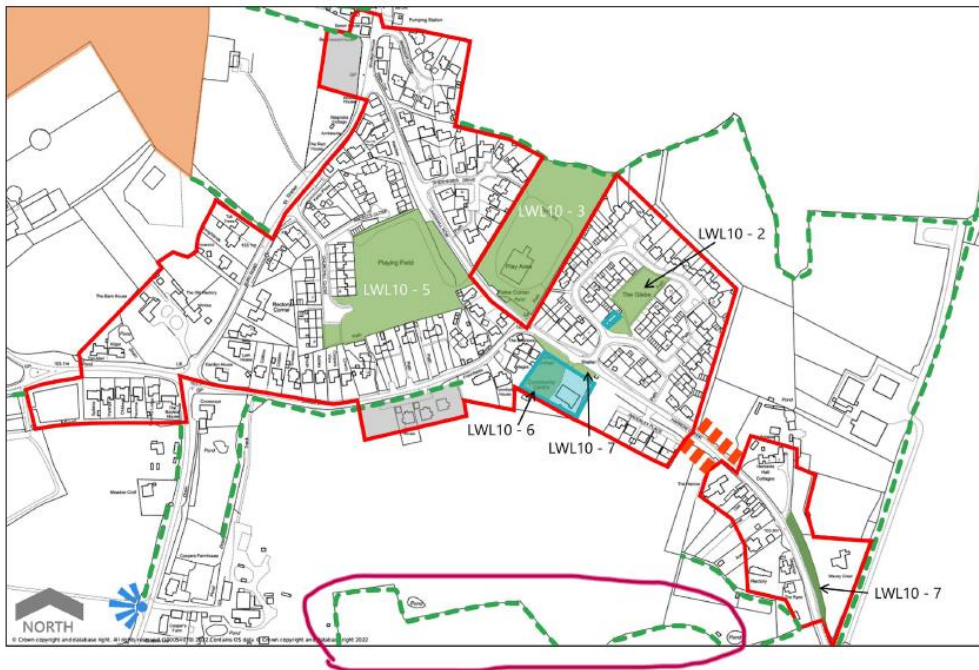
- The eastern part of this LGS designation is missing from Policy Inset Map 4, but is clearly shown in the separate Appraisal.

The Appraisal also provides evidence in support of LGS designations 11 to 15. We have reviewed each of these and have concluded that all meet the relevant NPPF criteria.

LWL 11 – Protecting Existing Natural Environmental Assets

This retained policy protects, amongst other things, ancient hedgerows and explains that these are shown on the Policies Maps.

Inset Map 2 shows what appears to be a newly mapped hedgerow line which runs between the rear of the Coopers Farm area in the west to Harrow Green road in the east. We have crudely circled this in purple in the map reproduced on the next page. Can the Parish Council please confirm whether or not this is a new addition?



INSET 2 - HARROW GREEN / LAMBS LANE

On Inset Map 4, the Character Assessment (page 15) shows a hedgerow line that runs approximately east > west on the south side of Hanningfield Green that is missing from Inset Map 4. There is also a hedgerow strip that runs approximately north > south, on the east side of the hamlet that is shown on Inset Map 4 but which does not appear on the Character Assessment Map.

In each case, can the Parish Council confirm which hedgerows should / should not be identified.

Extract from Policy Inset 4	Extract from Character Assessment page 15

Policies Map and Inset Maps

The Key on page 51 needs updating with regard to Policy number cross references as follows ...

- Lawshall Street Special Character Area (~~LWL-15~~) (LWL 14)

- Community Facilities (~~LWL 19~~) (LWL 18)
- Public Rights of Way (~~LWL 20~~) (LWL 19)

Because policy LWL 5 also refers to the Settlement Boundary, we suggest this should be added to the list of other policies referred to in the Key: (LWL 1, LWL 2, LWL 5, LWL 6)

Similarly, Important Views are also mentioned in policies LWL 8 and LWL 15. Would be helpful if these were also mentioned in the Key?

Appendix 4

Under the Household Extensions sub-heading page 61, the fourth bullet should be amended to read:

- In case of ~~an a after the~~ side extensions, does it retain important gaps within the street scene and avoid a 'terracing effect'?

[Ends]

References:

<https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Lawshall-NP-Review-Views-Assessment.pdf>

<https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Lawshall-NP-Review-Local-Green-Spaces.pdf>

<https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Lawshall-NP-Review-Character-Assessment.pdf>

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(3) NATURAL ENGLAND

E from: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Rec'd: 14 September 2023

Subject: Consultations Response - Lawshall Neighbourhood Plan Review - Regulation 16

Our ref: 444451

Your ref: Lawshall Neighbourhood Plan

Dear Mr Bryant

Planning consultation: Lawshall Neighbourhood Plan Review - Regulation 16 Consultation

Thank you for your consultation on the above dated 2 August 2023.

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

Further information on when to consult Natural England on planning proposals is here- [Planning and transport authorities: get environmental advice on planning - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/planning-and-transport-authorities-get-environmental-advice-on-planning)

Natural England is not able to provide specific advice on this application and therefore has no comment to make on its details. Although we have not been able to assess the potential impacts of this proposal on statutory nature conservation sites or protected landscapes, we offer the further advice and references to Standing Advice.

Natural England advises Local Planning Authorities to use the following tools to assess the impacts of the proposal on the natural environment:

Impact Risk Zones:

Natural England has provided Local Planning Authorities (LPAs) with Impact Risk Zones (IRZs) which can be used to determine whether the proposal impacts statutory nature conservation sites. Natural England recommends that the LPA uses these IRZs to assess potential impacts. If proposals do not trigger an Impact Risk Zone then Natural England will provide an auto-response email.

Standing Advice:

Natural England has published Standing Advice. Links to standing advice are in Annex A

If after using these tools, you consider there are significant risks to statutory nature conservation sites or protected landscapes, please set out the specific areas on which you require Natural England's advice.

Further information on LPA duties relating to protected sites and areas is here- [Protected sites and areas: how to review planning applications - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/protected-sites-and-areas-how-to-review-planning-applications)

Further guidance is also set out in Planning Practice Guidance on the natural environment [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/natural-environment) and on Habitats Regulations Assessment [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/habitats-regulations-assessment)

Non detailed advice from Natural England does not imply that there are no impacts on the natural environment. It is for the local planning authority to determine whether or not the proposal is consistent with national and local environmental policies. Other bodies and individuals may provide information and advice on the environmental value of this site and the impacts of the proposal on the natural environment to assist the decision making process.

Should the proposal change, please consult us again.

Yours sincerely

Sally Wintle

Adviser
Operations Delivery, Consultations Team,
Natural England, County Hall, Spetchley Road, Worcester, WR5 2NP

Tel 0300 0603900

mail to: consultations@naturalengland.org.uk

www.gov.uk/natural-england



Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

(4) HISTORIC ENGLAND

E from: Historic England

Rec'd: 14 September 2023

Subject: Ref: Lawshall Regulation 16 Neighbourhood Plan Consultation

Our ref: PL00791448

Dear Community Planning Team

Ref: Lawshall Regulation 16 Neighbourhood Plan Consultation

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

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

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

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

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

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

Yours sincerely,



Dr Will Fletcher FSA

Development Advice Team Leader: East Region

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

www.historicengland.org.uk

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(5) ANGLIA WATER

E from: Tessa Saunders | Spatial Planning Advisor

Rec'd: 29 August 2023

Subject: RE: Notice of consultation - R16 Lawshall NP Review (Babergh DC)

Dear Paul,

Thank you for consulting Anglian Water with regard to the Lawshall Submission Neighbourhood Plan (Reg 16) consultation. I confirm that we have no further comments regarding the policies within the Neighbourhood Plan and consider that our comments on the Reg 14 pre-submission draft have been appropriately addressed in the submission version.

For the benefit of the Parish Council regarding

COMMUNITY ACTION 3 - FLOODING RISK The Parish Council will approach Anglian Water to check that the facilities at Bury Road have been upgraded to cope with a similar event to that experienced in September 2014, and if not, to formally request them to do so.

We have installed an Event Duration Monitor at the sewer pumping station off Bury Road (LAWSHALL-HARROWS TRIANGLE SP) so we are able to monitor events and plan any investments as and when required. Details can be found on our website

<https://www.anglianwater.co.uk/environment/storm-overflows/improving-rivers-and-coastlines>

Our final [Drainage and Wastewater Management Plan](#) published at the end of May 2023, confirms our medium and long term strategies for Shimpling Water Recycling Centre catchment, which focuses on reducing surface water from entering our sewerage network through the use of SuDS, aiming to remove 50% surface water by 2050.

Kind regards,



Tessa Saunders MRTPI
Spatial Planning Advisor

Web: www.anglianwater.co.uk

Anglian Water Services Limited

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

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(6) MARINE MANAGEMENT ORGANISATION

E from: Marine Management Organisation

Rec'd: 16 August 2023

Subject: RE: Notice of consultation - R16 Lawshall NP Review (Babergh DC)

Good morning,

Thank you for your invitation to participate in the consultation for the Lawshall Neighbourhood Plan review 2021 – 2037.

No further comment is required from the MMO regarding the review given your proximity to the marine environment, we do however advise that you consider any relevant policies within the [East Marine Plan Documents](#) in regard to areas within the plan that may impact the marine environment, including the tidal extent of any rivers. We recommend the inclusion of the East Marine Plans when discussing any themes with coastal or marine elements.

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

For further information, a copy of the standard response is attached.

Many thanks for the opportunity to comment,

Louise Feavyour

Louise Feavyour (she/her) | **East Coastal Marine Planner** | **Marine Management Organisation**

📍 MMO | Pakefield Road | Lowestoft | Suffolk | NR33 0HT

✉️ Louise.Feavyour@marinemanagement.org.uk | 📞 07584 547534

Our MMO Values: Together we are **Accountable**, **Innovative**, **Engaging** and **Inclusive**

[Explore Marine Plans](#) [Website](#) [Blog](#) [Twitter](#) [Facebook](#) [LinkedIn](#) [YouTube](#)



During the current health emergency, the Marine Management Organisation is continuing to provide vital services and support to our customers and stakeholders. We are in the main working remotely, in line with the latest advice from Government, and continue to be contactable by email, phone and on-line. Please keep in touch with us and let us know how we can help you <https://www.gov.uk/mmo>.

Consultation response - PLEASE READ

Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Marine Management Organisation Functions

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

Marine Planning and Local Plan development

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

Under Section 58(3) of [Marine and Coastal Access Act \(MCAA\) 2009](#) all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK [Marine Policy Statement](#). This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service: soundness self-assessment checklist](#).

We have also produced a [guidance note](#) aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our [gov.uk page](#).

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

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

Marine Licensing and consultation requests below MHWS

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

Consultation requests for development above MHWS

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

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

Minerals and Waste Local Plans and Local Aggregate Assessments

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

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

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

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

(7) WATER MANAGEMENT ALLIANCE

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

Rec'd: 2 August 2023

Subject: RE: Notice of consultation - R16 Lawshall NP Review (Babergh DC)

Good Morning,

Thank you for your consultation on the Lawshall Neighbourhood Plan Review 2021-2037. The parish of Lawshall lies outside the district of the East Suffolk Water Management Board, as well as the Board's wider watershed catchment, therefore the Board has no comments to make.

Kind Regards,



Will Chandler BSc (Hons), MCIWEM

Sustainable Development Officer

Water Management Alliance

m: 07826 940760 | dd: 01553 819630 | william.chandler@wlma.org.uk

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


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

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

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

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

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Defenders of the Lowland Environment

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Suffolk Wildlife Trust
Brooke House
Ashbocking
Ipswich
IP6 9JY
01473 890089
teamwilder@suffolk
wildlifetrust.org
suffolkwildlifetrust.org



Lawshall NP Review Consultation, c/o Spatial Planning Policy Team
Babergh and Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich, IP1 2BX

23rd August 2023

RE: Lawshall Neighbourhood Plan Review 2021 – 2037 | Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Thank you for sending us details of the next stage of the Lawshall Neighbourhood Plan, we have the following comments:

We are pleased to see the inclusion of *Biodiversity* alongside *Landscape, Settlement, Views, and Open Spaces* within the Natural Environment chapter of the draft.

The identification of local Green Spaces is vital in allowing a connection with nature, which is a key component of physical and mental health. The draft also identifies *Frithy Wood SSSI* as a hugely important component of the neighbourhood, which we support. Work to improve the habitats in the parish is undertaken in part by the Green Light Trust, and Environmental Education charity, and alongside identification of the importance of landscape connectivity for wildlife, such as ancient hedgerows which are identified on a policies map, the draft shows reference to the Lawton Principles, of delivering, “bigger, better, and joined up” habitat for nature which the Trust supports.

Policy LWL 11 (Protecting the Natural Environmental Assets) includes reference to a policies map which identifies key habitat and, in line with the mitigation hierarchy, puts forward that proposals within the parish should protect habitat, including wildlife corridors, of value for nature. The measures to mitigate, compensate, and enhance for species such as hedgehogs and swifts are supported by the Suffolk Wildlife Trust.

We wholeheartedly support the references made to Biodiversity Net Gain within *Para 7.34* which suggests that while timings are unclear developers should deliver measurable net gain in all development; we advocate that in many scenarios an aspiration to deliver 20% net gain should be sought. Suffolk Wildlife Trust would go further and suggest that, following the seemingly likely national requirement of a minimum 10% net gain, Lawshall should also advocate that development should seek to deliver a minimum 20% net gain to show its desire to support better outcomes for nature.

Therefore, we support the wording of *Policy LWL12 – Biodiversity* but would support an additional point: ‘d. That development in Lawshall should seek to deliver 20% measured net gain for biodiversity.’

Suffolk Wildlife Trust also offer their support for *Community Action 1 – Biodiversity* in looking to maintain and increase Lawshall’s biodiversity natural habitats, and their long-term resilience as our climate changes. Acknowledging a global biodiversity crisis, as well as references to climate change, are key steps in

acknowledging the importance of, not only *Community Action 1*, but *LWL11* and *LWL12* as well as the importance of greenspaces (*LWL10*).

Yours sincerely

Alex Jessop
Planning & Advocacy Officer

(9) DEFENCE 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: Lawshall Neighbourhood
Plan

Our reference: 10056593

Mobile: +44 (0) 7800 505824

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

christopher.waldron861@mod.gov.uk

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

15th September 2023

Dear Paul

It is understood that Babergh and Mid Suffolk District Councils are undertaking a consultation regarding their Lawshall Neighbourhood Plan Review 2021 – 2037 under Regulation 16. This document will guide the future development of the parish.

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

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

Copies of these 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 Lawshall Neighbourhood Plan Review is washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites. Wattisham Station is located to the East of the Lavenham 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.

Where development falls outside designated safeguarding zones, the MOD may have an interest, particularly where the development is of a type likely to have an impact on operational capability by virtue of scale, height, or physical properties. Examples of these types of development include renewable energy development such as the installation of wind turbine generators or solar photo voltaic panels, or 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. Solar PV development can compromise the operation of communications and other technical assets by introducing substantial areas of metal that degrade signals and, depending on the location of development, may produce glint and glare to the detriment of aviation safety. 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.

The MOD should be consulted within the Lawshall Neighbourhood Plan Review 2021 – 2037 within the statutory technical safeguarding zone that surrounds Wattisham Station, which consists of structures or buildings exceeding statutory safeguarding technical criteria.

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

(10) Resident – Mr Livall

By e-mail

Rec'd: 14 September 2023

cc to: Lawshall Parish Council; Richard Kemp (SCC Councillor), Stephen Plumb (Babergh District Cllr); Mr Isbell (Chief Planning Officer, B&MSDC), and representatives from Suffolk Wildlife Trust

Subject: Lawshall NDP Review 2021-2037 Representations - Reg 16 Submission consultation

Dear Mr Bryant

**Lawshall NDP Review 2021-2037 Representations
Reg 16 Submission consultation (2 Aug to 15 Sept 2023)**

I have recently had the pleasure of viewing the Lawshall NDP Review 2021-2037 Reg 16 Submission consultation (2 Aug to 15 Sept 2023) and attach my representations.

I would be grateful if you will kindly acknowledge receipt of this communication please.

As a final comment it is clear that planning officers are hugely under-resourced. In the last section of my submission [Section 11: Biodiversity] I do raise some political issues on resourcing which may be of interest to Elected Members and the press.

Kind regards

Mr R Livall

Lawshall NDP Review 2021-2037 Representations

Reg 16 Submission consultation (2 Aug to 15 Sept 2023)

1.	Plan Consultation
1.1	The plan consultation is incomplete as my second tranche of submissions is missing (<i>see para 1.2 below</i>). The submissions were made on 29th November 2022 before the closure of the consultation period and their receipt was acknowledged by the Parish Council Chairman (<i>also acting as Parish Clerk</i>) on 29/11/22 20:23.
1.2	<p>“General Comments</p> <p>7. <i>The Plan Review has set down a very solid foundation which if fine-tuned can provide an important footprint which other rural communities may wish to follow when undertaking their Neighbourhood Plans.</i></p> <p>8. <i>Lawshall Parish Council has the opportunity to lead the plan review making process for other communities in Suffolk and beyond by taking an innovative approach using the latest planning tools and good practice.</i></p> <p>1. Do you support the content of Chapters 1, 2 and 3?</p> <p>YES <i>Support in general but have made some additional comments.</i></p> <p>1.4. <i>Para 2.5 - Suggest update once the Census 2021 results are available at a parish level - https://census.gov.uk/census-2021-results .</i></p> <p>1.5. <i>Make use of useful data that the Suffolk Observatory may be providing - https://www.suffolkobservatory.info/ .</i></p> <p>14. Do you support Policy LWL 10 – Local Green Spaces?</p> <p>YES <i>Support in general the principle of designating Local Green Spaces but have major concerns about significant omissions and consultation procedures that have been adopted.</i></p> <p>14.27. <i>Paras. 7.14 and 7.15 list valued open spaces and greens which were identified by the community in preparing the 2017 Neighbourhood Plan. These in turn have been put forward as Local Green Spaces. There are two other greens/open spaces that are equally important and easily missed:</i></p> <p>(a) <i>Open space on both sides of the road at Hart's Green near the edge of the parish.</i></p> <p>(b) <i>Open space on both north and south sides of the road at the junction of Hartest Lane and Golden Lane (the southern side will adjoin the housing site DC/21/00111).</i></p>

In terms of consistency of approach both these areas should be designated Local Green Space.

14.28. Para 7.15 states "9) Hibbs Green – two narrow strips of green that provide an attractive wide verge." but these are not identified on "Inset 4 - Hanningfield Green, Hibbs Green and Lawshall Green".

or cross-referenced to "Policy LWL10 - 9" on the Policies Map. It is believed that one of these strips has been roped off and the status of the land might be clarified by the Parish Council.

14.29. On "Inset 4 - Hanningfield Green, Hibbs Green and Lawshall Green", Hanningfield Green which is notated "Policy LWL10 - 6" is shown as two parcels of land. The notation should read "Policy LWL10 - 8" and it is questioned whether the western parcel is a drafting error as it is not part of the County Wildlife Site?

14.30. On "Inset 1 - Bury Road", The Foundry is notated "Policy LWL10 - 10" when it should read "Policy LWL10 - 1".

14.31. On "Inset 2 - Harrow Green / Lambs Lane", a new second notation "Policy LWL10 - 7" appears in front of the Village Hall Open Space "Policy LWL10 - 6". Is this intentional as the "Policy LWL10 - 7" notation appears in Harrow Green near the eastern periphery of the settlement?

14.32. A "Local Green Space Appraisal" will be undertaken of Local Green Space in accordance with Paragraph 7.17 of the Plan Review. A robust analysis may determine that some narrow strips of green verge do not strictly accord with the criteria laid down in Paragraphs 101 to 103 of the National Planning Framework (July 2021). Should this issue arise, the case is made that verge strips should be re-designated in the Plan Review as "Areas of Visual Amenity" or similar wording. Our green space should not be left unprotected.

41. Do you have any comments on Chapter 11 – Infrastructure and Employment?

YES

AGRICULTURE

41.11. Whilst farming activities form a critical backdrop to rural communities, most Neighbourhood Plans generally provide very weak coverage for Agriculture. The Plan Review is no different with just a couple of short paragraphs (Paras 11.11 and 11.12) and a sound all-purpose policy on Farm Diversification (Policy LWL 23). It is possible for the Parish Council to go into greater depth using new source material from the Suffolk Heritage Explorer - <https://heritage.suffolk.gov.uk/> - <https://heritage.suffolk.gov.uk/Source/SSF59079> - recorded as part of the recent Farmsteads in the Suffolk Countryside Project. This indicates that Lawshall had around 30 farms:

LWL 060 Farmstead: Audley End Farm (Farmstead)

LWL 058 Farmstead: Barford's Farm (Farmstead)

LWL 061 Farmstead: Brighthouse Farm (Farmstead)

LWL 072 Farmstead: Buggis's Farm (Farmstead)

LWL 050 Farmstead: College Farm (Farmstead)

LWL 063 Farmstead: Combs Farm (Farmstead)

LWL 065 Farmstead: Cooper's Farm (Farmstead)

LWL 062 Farmstead: Dale's Farm (Farmstead)

LWL 074 Farmstead: Folly Farm (Farmstead)

LWL 071 Farmstead: Gate Farm (Farmstead)
LWL 053 Farmstead: Hanningfields Farm (Farmstead)
LWL 056 Farmstead: Harstgreen Farm (Farmstead)
LWL 068 Farmstead: Herbert's Farm (Farmstead)
LWL 070 Farmstead: Hill's Farm (Farmstead)
LWL 049 Farmstead: Lawshall Green Farm (Farmstead)
LWL 059 Farmstead: Lawshall Hall (Farmstead)
LWL 067 Farmstead: Moat Farm (Farmstead)
LWL 055 Farmstead: Newhouse Farm (Farmstead)
LWL 051 Farmstead: Paradise Farm (Silver Farm) (Farmstead)
LWL 057 Farmstead: Potash Farm (Farmstead)
LWL 076 Farmstead: Rowney Farm (Farmstead)
LWL 054 Farmstead: Shrub Farm (Farmstead)
LWL 052 Farmstead: Trees Farm (Farmstead)
LWL 048 Farmstead: Warbanks Farm (Corner Farm) (Farmstead)
LWL 064 Farmstead: West Farm (Farmstead)
LWL 066 Farmstead: West Farm (Moat House) (Farmstead)
LWL 069 Outfarm: Corder's Farm (Farmstead)

LWL 073 Fieldbarn: Bush Farm (Farmstead)
LWL 075 Fieldbarn: Unnamed Fieldbarn (Farmstead)

Missing - Street Farm, Lawshall (LWL 030)
Missing - Waldegrave Farm, Hartest
Others?

41.12. The aim of the Farmsteads in the Suffolk Countryside Project is to raise awareness of the importance of these undesignated heritage assets and improve their long-term management to ensure a sustainable future for Suffolk farmsteads. (Reference - Farmsteads in the Suffolk Countryside - <https://heritagesuffolk.wordpress.com/2020/06/16/farmsteads/>). It provides an evidence base for the development of planning policy, raising the profile of farmsteads as important elements of landscape character.

41.13. Lawshall Parish Council has the opportunity to take the lead on heritage assets identified in the Farmsteads in the Suffolk Countryside Project. This interesting and important issue appears to have been neglected in other Neighbourhood Plans. The old farmsteads that have been identified are "undesignated heritage assets" that have been researched by Suffolk County Council Archaeological Service. Those assets that remain should be listed and annotated in the Policies Maps of the Plan Review and supported by expanded policy coverage.

41.14. Historic England have produced a Farmstead and Landscape Statement for our area which helps to identify the historic character of traditional farmsteads and their buildings - <https://historicengland.org.uk/research/results/reports/8106/SouthSuffolkandNorthEssexClaylandsEasternArable>
Reference should also be made to more local planning sources.

41.15. Some source material is available nationally, e.g. - "Farmsteads Assessment Guidance for Tunbridge Wells Borough" - https://tunbridgewells.gov.uk/data/assets/pdf_file/0009/343638/Farmsteads-SPD-Adopted-Feb-2016_lowres.pdf - and
"Staffordshire Farmsteads Assessment Framework" - <https://www.staffordshire.gov.uk/environment/Environment-and-countryside/HistoricEnvironment/Documents/Farmsteads-Guidance-Staffs-Farmsteads-Assessment->

[Framework-Feb-15.pdf](#)

41.16 Whilst the Farmsteads in the Suffolk Countryside Project provide a historical and conservation-focussed framework, it is also important to assess the current needs and requirements of Agriculture in Lawshall.

41.17. It is assumed that the main employment base in the Parish currently remains Agriculture, with associated forms of diversification (but there is uncertainty re the level of home-working).

41.18. A Farm Survey should be undertaken as part of the Neighbourhood Plan Review to establish current conditions and requirements of farming in the parish. This may entail discussions with landowners and their representatives.

Brighthouse Farm

Corner Farm

Buggis's Farm

Cooper's Farm

Hanningfields Farm

Moat Farm

Newhouse Farm

Potash Farm

Rowney Farm

West Farm

{Lawshall Hall}

Others?

No. of let agricultural tenancies?

Diversification:

Holiday accommodation

Caravan and camping

Riding centre

Agricultural services

Haulage

Other uses?

41.19. The Farm Survey should help determine, in terms of diversification, whether any "Built Area" of farms are now being operated as Employment Sites rather than Working Farms. In the case of the former, the Neighbourhood Plan Review should assess whether the "Built Area" of the farm should be redesignated a "Business Site" and perhaps have regard to the relevant Use Class. It is clear that Corner Farm is no longer a Working Farm and is now a "Business Site".

42. Do you support the content of the Policies Maps?

Whilst supporting the overall concept of the Plan, after careful scrutiny there are a number of issues that need to be addressed. Below are the issues relevant to the Policies Maps that I have previously highlighted:

4.4. Lawshall Green Settlement Boundary - Does not accord with Lawshall Green/ Hibb's Green as shown in Draft JLP as southernmost building has been omitted from the Plan Review. Why?

4.8. *Lambs Lane / Harrow Green Settlement Boundary - Land West Of Sydena, Lambs Lane has planning permission for 2 dwellings under DC/21/00111 and should now be included within the settlement boundary. This will avoid confusion and inconsistency.*

14.27. *Paras. 7.14 and 7.15 list valued open spaces and greens which were identified by the community in preparing the 2017 Neighbourhood Plan. These in turn have been put forward as Local Green Spaces. There are two other greens/open spaces that are equally important and easily missed:*

(a) Open space on both sides of the road at Hart's Green near the edge of the parish.

(b) Open space on both north and south sides of the road at the junction of Hartest Lane and Golden Lane (the southern side will adjoin the housing site DC/21/00111).

In terms of consistency of approach both these areas should be designated Local Green Space.

14.28. *Para 7.15 states "9) Hibbs Green – two narrow strips of green that provide an attractive wide verge." but these are not identified on "Inset 4 - Hanningfield Green, Hibbs Green and Lawshall Green".*

or cross-referenced to "Policy LWL10 - 9" on the Policies Map. It is believed that one of these strips has been roped off and the status of the land should be clarified by the Parish Council.

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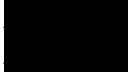

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14.32. *A "Local Green Space Appraisal" will be undertaken of Local Green Space in accordance with Paragraph 7.17 of the Plan Review. A robust analysis may determine that some narrow strips of green verge do not strictly accord with the criteria laid down in Paragraphs 101 to 103 of the National Planning Framework (July 2021). Should this issue arise, the case is made that verge strips should be re-designated in the Plan Review as "Areas of Visual Amenity" or similar wording. Our green space should not be left unprotected.*

41.13. *Lawshall Parish Council has the opportunity to take the lead on heritage assets identified in the "Farmsteads in the Suffolk Countryside Project". This interesting and important issue appears to have been neglected in other Neighbourhood Plans. The old farmsteads that have been identified are "undesigned heritage assets" that have been researched by Suffolk County Council Archaeological Service. Those assets that remain should be listed and annotated in the Policies Maps of the Plan Review and supported by expanded policy coverage.*

41.19. *The Farm Survey should help determine, in terms of diversification, whether any "Built Area" of farms are now being operated as Employment Sites rather than Working Farms. In the case of the former, the Neighbourhood Plan Review should assess whether the "Built Area" of the farm should be*

	<p><i>redesignated a "Business Site" and perhaps have regard to the relevant Use Class. It is clear that Corner Farm is no longer a Working Farm and is now a "Business Site".</i></p> <p>ADDITIONAL INSET MAPS</p> <p><i>ADD1 - The "Built Area" of Corner Farm is now being operated as an Employment Site and not a Working Farm. This should be recognised in the Plan Review with a new Corner Farm Inset Map covering the Employment Site, Important Woodland, Local Green Space (if appropriate), Buildings and Structures of Local Significance, Landscaping and a suitable notation for The Warbanks. NB: Corner Farm used to be named Warbanks Farm - which would perhaps make "Warbanks Inset Map" a more fitting title.</i></p> <p><i>ADD2 - It would be advantageous to have a Frithy Wood and Hart's Green Inset Map covering the SSSI, Important Woodland, Area of Local Landscape Sensitivity, Local Green Space (at Harts's Green), Listed Building, Important View and notation for "Woodpasture and Parkland BAP Priority Habitat". Potash Farm straddles the Babergh / West Suffolk Boundary and has benefited from diversification. Is the "Built Area" an Employment Site or a Working Farm or both?</i></p> <p>45. NAME & ADDRESS - EMAIL</p> <p><i>Richard Livall</i>  <i>Lawshall</i> <i>Bury St Edmunds</i> <i>Suffolk</i> </p> <p><i>Email: xxxxxxxxxx</i></p> <p>46. Would you like to be notified when the Parish Council submits the Plan to Babergh District Council? (if yes, please provide either an address or email address in your response to Question 45 above)</p> <p><i>YES</i></p> <p>47. Would you be willing to have your contact details shared with Babergh District Council for the sole purpose of enabling that Council to keep you informed of further consultations on the Plan?</p> <p><i>YES</i></p> <p><i>Data will be processed by Babergh District Council in accordance with their information security policies and Privacy Notice (available on their website)."</i></p>
2.	Protection of Important Views
2.1	Original Comment – 13.1. The Important Views that are to be protected should be listed in Para 7.10 or Policy LWL 9 which should assist their definition/cross-referencing on the Policies Maps.

	<p>PC response – This is not considered necessary</p> <p>Proposed changes – None</p> <p>Concern – The Policies Maps (on page 51-55) should facilitate easy reference back to the Neighbourhood Plan text and the Assessment of Views as in other Neighbourhood Plans. Local Green Spaces references in contrast are included on the Policies Maps of the Lawshall NP Review. Making reference to a particular View is both cumbersome and unnecessarily difficult.</p>
2.2	<p>Original Comment – 13.4. Support for the important view looking northwards from The Street (Swan Inn) towards Frithy Wood. Accords with the Planning Inspector’s appeal decision re APP/D3505/W/20/3261326 on Land North of The Street who stated “views of the historic woodland, make a positive contribution to the street scene and wider area.”</p> <p>PC response – Noted</p> <p>Proposed changes – None</p> <p>Concern – View 15 north from gateway in The Street to Frithy Wood SSSI is missing from Character Area 2 Residential Roads The Street on page 11 of the Lawshall Character Assessment (2023) and should be incorporated in the revised assessment to ensure consistency.</p>
2.3	<p>I make a further comment with respect to the positioning of View 15 [View north from gateway in The Street to Frithy Wood SSSI].</p> <p>I am not sure if the exact positioning of the viewpoint would really matter in planning terms, but for the avoidance of doubt the symbol might be positioned opposite the Swan Public House nearer the field entrance on page 18 of the Assessment. However, I recognise that the blue pub symbol on the OS Map will then clash with the viewpoint symbol.</p> <p>The precise positioning of the View 15 symbol on Inset 3 The Street of the NP Review might also be amended accordingly.</p> <p>Concern – To avoid any misrepresentation in the future.</p>
2.4	<p>Original Comment - 13.6. Object to the exclusion of the view looking south-westwards from Bury Road entrance to The Foundry where Greenlight Trust kindly allow public access to Golden Wood. The view from the Bury Road entrance (and further south if desired) is of importance as it helps protect the open setting and the character and appearance of one of Lawshall's most significant area of community woodland. This area would be harmfully compromised by new development and view much diminished.</p> <p>PC response - The view from Bury Road to Golden Wood will be added</p> <p>Proposed changes - Add view from Bury Road to Golden Wood</p> <p>Concern - An error has arisen as this view has not been added to Inset 1 - Bury Road of the Neighbourhood Plan Review; Character Area 2: Residential Roads - Bury Road of the Lawshall Character Assessment (2023); and the Assessment of Important Views.</p>



Golden Wood View from the Foundry entrance


2.5

Original Comment – 13.7. Object to the exclusion of the view looking eastwards from the Right of Way at the Bury Road entrance to Coldham Hall (looking along the iconic avenue of trees towards Coldham Hall).

PC response – The previous draft NP had a view out of the parish that was deleted from the Plan by the Examiner as not appropriate. This view has the same properties.

Proposed changes – None

Concern – The view does not have the same properties. The PC are referring to the view north of Brands Lane right on the parish boundary. It is understandable that the Examiner should recommend the deletion of this view when considering the 2017 version of the NP. In contrast the south-eastern view along the Coldham Hall entrance avenue of trees (and parkland area to the south) is not on the parish boundary. In fact the view is more extensive than that endorsed as View 2 [View west towards Bevan’s Farm in Whepstead parish (West Suffolk)] in the Assessment of Important Views (page 5). The Coldham Hall avenue of trees and parkland view is iconic and it is very hard to understand why the PC would not wish to protect it? The PC’s justification for not accepting this view is in my view not soundly based as the view does not have the same properties as the Brands Lane view.

	
	<p>Coldham Hall ROW View</p>
<p>2.6</p>	<p>Original Comment - 13.8. All Important Views that are put forward during this initial consultation should be the subject of a robust "Assessment of Important Views". Justification - in the interests of fairness to members of the community and landowners and to assist the Examiner</p> <p>PC response - The final Assessment will be published when the Plan is submitted to Babergh</p> <p>Proposed changes - None</p> <p>Concern - This does not explain why views put forward during the Public Consultation should not be subject to a robust "Assessment of Important Views". I make the case that all sites that have been submitted during the Public Consultation should be subject to proper appraisal.</p>
<p>3.</p>	<p>Character Assessment June 2023</p>
<p>3.1</p>	<p>The Character Assessment June 2023 appears to show minor revisions to the Character Assessment Autumn 2017 version.</p> <p>Concern – The updated Assessment does not identify what changes have been made since the 2017 version and the reasons for the changes.</p>
<p>3.2</p>	<p>It is clear that the in terms of a consistent approach the Important Views in the Character Assessment June 2023 should accord with the 25 Views identified in the NP Review Policies Maps and the</p>

	<p>Assessment of Important Views. This is of importance as any missing views or other inconsistencies may be exploited by Appellant's Agents at future planning appeals. In this context the following issues are raised:</p> <ul style="list-style-type: none"> (a) "Special Landscape Area" designation is still defined in the updated Character Assessment and should conform with the current "Area of Local Landscape Sensitivity" designation in the NP Review. (b) The Character of the Parish and subsequent Views change over the seasons but no attempt has been made to recognise this and update and strengthen the Character Assessment. (c) View 1 is missing from the Character Assessment [View north-east of Folly Lane]. Folly Lane (South) Map (d) View 15 is missing from the Character Assessment [View north from gateway in The Street to Frithy Wood SSSI] The Street (e) View 16 is missing from the Character Assessment [View east from Donkey Lane towards Cockfield] Donkey Lane Map Extended? (f) View 20 is missing from the Character Assessment [View north from football pitch on Shimpling Road towards The Street] (g) View 25 is missing from the Character Assessment [View west towards Frithy Wood from Donkey Lane] Donkey Lane Map (h) In addition in my Para 2.3 I have highlighted the exclusion of the view looking south-westwards from Bury Road entrance to The Foundry towards Golden Wood. The Parish Council have made the decision to "Add view from Bury Road to Golden Wood". <p>Concern – The updated Character Assessment is currently missing key components.</p>
3.3	<p>Changes have been made to the Character Assessment, but the general community do not appear to have been allowed any input into the 2023 version.</p> <p>The Character Area 2: Residential Roads - Bury Road survey undertaken in May 2016 did not identify the following key characteristics, namely:</p> <ul style="list-style-type: none"> - the Coldham Hall Parkland area - the Deciduous Woodland tree belt on the east side of Bury Road - the Deciduous Woodland area to the south of the Coldham Hall Parkland area (abutting residential boundaries). <p>I make this comment in terms of their important contribution to the landscape and general character of Lawshall. However they are also of importance in biodiversity terms, as each area has been identified as a Priority Habitat in the Magic Map.</p> <p>Concern – It does not make sense that the Character Assessment has been revised, but at the moment the community are unable to put forward relevant updates relating to omissions. At the same time comments are being "batted away" in the Consultation Report on the grounds that the matter was not identified in the Character Assessment.</p>




Key woodland and parkland characteristics have been missed in the Character Assessment on the east side of Bury Road. These areas are clearly identified on the Magic Map.




Deciduous Woodland can be clearly seen from Bury Road at the rear of the Roman Catholic Church



Deciduous Woodland (Priority Habitat) to the rear of properties in Bury Road

4.	Local Green Spaces
4.1	I have deep concerns regarding the lack of reasoned justification provided by the Parish Council to a number of comments I have made relating to suggested Local Green Space designations.
4.2	<p>Original Comment - 14.8. The parkland area (private) at Coldham Hall should be designated as Local Green Space. Justification - historical significance, ecological significance, close to community, ROW, self-contained landscape</p> <p>PC response - The Parish Council does not believe that element of Coldham Hall within Lawshall meets the criteria</p> <p>Proposed changes - None</p> <p>Concern - The Parish Council has provided no evidence that the criteria has not been met as it has not undertaken a Local Green Spaces Assessment for this area.</p>
	
	Coldham Hall Parkland Area
4.3	Original Comment - 14.12. Golden Wood (community woodland) should be designated as Local Green Space. Justification - scenic setting, ecological significance (woodland, grassland and pond), ancient hedgerows, close to community, public access and adjoining ROW, self-contained landscape, tranquillity.

	<p>PC response - The land concerned is already looked after by The Green Light Trust and it is not necessary to designate it as Local Green Space.</p> <p>Proposed changes - None</p> <p>Concern - The fact that Golden Wood is currently looked after by the Green Light Trust is not a planning reason for dismissing Local Green Space designation. Again it is noted that a robust appraisal has not been undertaken for this area. I highlight that it does not make any sense that "1. The Foundry Meadow" [with buildings and car parking] is included as a Local Green Space in the Local Green Spaces Assessment with Green Light Trust ownership, while in the Consultation Report, Golden Wood is excluded because of Green Light Trust ownership.</p> <p>Golden Wood is identified as a Village spaces [Recreation, amenity & village greens] on page 12 of the Character Assessment June 2023</p>
	
	<p>Wonderful area of open space in Golden Wood</p>



Foundry Meadow Local Green Space

4.4 Original Comment - 14.13. The future of the Village Recreation Ground (private) at Shimpling Road needs to be properly determined/discussed by the Parish Council with the landowner. It should be designated as Local Green Space if it can be established that the Recreation Ground will be in use during and beyond the Plan period.

PC response - Noted

Proposed changes - None

Concern - The PC has not given a reasoned response to this important issue. The Village Recreation Ground should be designated as Local Green Space if it can be established that the Recreation Ground will be in use during and beyond the Plan period.

4.5 Original Comment - 14.15. Crooked Wood community woodland (and the adjoining private woodland area) should be assessed by the Parish Council with a view to designating them as Local Green Space.

PC response - Crooked Wood will be added to the list of Local Green Spaces

Proposed changes - Amend Policy LWL10 and the Policies Map

Concern - It does not make any sense to omit the adjoining / contiguous private woodland area from this Local Green Space designation. If the Examiner walks through this wooded area, it is difficult to distinguish between the area that has been delineated as LGS from the area that has been omitted. There is no logic for the delineation other than different ownerships.



Crooked Wood (in background on the left side) is designated as Local Green Space but the private woodland (in the foreground on the right side) is excluded.



Public access from the road but this wonderful area of private woodland is not put forward for Local Green Space designation.

4.6	<p>Original Comment - 14.26. All sites that are put forward during this initial consultation should be the subject of a robust "Local Green Space Assessment".</p> <p>PC response - The document will be published to accompany the submission of the Plan to Babergh</p> <p>Proposed changes - None</p> <p>Concern - This does not explain why many sites put forward during the Public Consultation have not been subject to a robust "Local Green Space Assessment". I make the case that all sites that have been submitted during the Public Consultation should be subject to proper appraisal.</p>
4.7	<p>It should be noted that I submitted 2 additional areas that may be considered for Local Green Space designation:</p> <p>(a) Open space on both sides of the road at Hart's Green near the edge of the parish.</p> <p>(b) Open space on both north and south sides of the road at the junction of Hartest Lane and Golden Lane (the southern side will adjoin the housing site DC/21/00111).</p> <p>Concern – These two areas formed part of my submission of 29th November 2022 but have not been considered by the Parish Council. See my Para 1.2 above for further details and my other concerns relating to Local Green Space.</p>
	
	<p>These amenity areas at Hart's Green have not been assessed for Local Green Space designation.</p>



These amenity areas at Golden Lane/Hartest Lane have not been assessed for Local Green Space designation.

4.8 In Policy LWL10, LGS 12 is identified as Grassland area (private) between The Street and Frithy Wood. Other LGS designations do not have "(private)" inserted in the title. I highlight that the Local Green Spaces Assessment identifies the following sites to be in private ownership:

- 10. *Lawshall Green (part private ownership)*
- 11. *Grassland area between Bury Road and Golden Wood (south of The Foundry) (private ownership)*
- 12. *Grassland area (private) between The Street and Frithy Wood*
- 14. *Woodland adjoining Lawshall Green (private ownership)*

In addition there are 3 other sites that are not in the ownership of the Parish or District Councils

Concern – In terms of consistency all sites designated as Local Green Space in Policy LWL10 and the LGS Assessment should be titled in a similar manner.

5. Local Green Spaces Assessment

5.1 Please note that "7. Harrow Green" defined in the Local Green Spaces Assessment is not owned by Mid Suffolk District Council.

Concern – Incorrect information.

5.2	<p>Please note that "12. Grassland area (private) between The Street and Frithy Wood" defined in the Local Green Spaces Assessment may in itself be of wildlife importance. The northern section was surveyed a few years ago by local wildlife experts (at the invitation of the landowners). The experts confirmed that the grassland is quite species rich and exhibited a profusion of Adder's Tongue Fern. It was stated at the time that if surveyed by the Suffolk Wildlife Trust, the northern section may be worthy of County Wildlife Site status.</p> <p>A Hedgerow Field Survey was undertaken for both the southern and western ancient hedgerows in June and July 2009 as part of the Suffolk Hedgerow Survey. The two recorders established that the southern hedgerow fronting The Street has 14 species including ash, blackthorn, bramble, crab apple, cherry, dogwood, elm, field maple, hawthorn, hazel, holly, oak, sycamore and oak. The wood bank and historic ditch were also recorded. The western hedgerow had 9 species including rose species and spindle. I am not aware of any other hedgerow in the parish matching the profusion of species that were identified in the historic hedgerow fronting The Street.</p> <p>Concern – The importance of using supporting wildlife evaluations and survey data.</p>
5.3	<p>Please note that "15. Churchyard " defined in the Local Green Spaces Assessment is in The Street settlement and not the Lawshall Green hamlet.</p> <p>Concern – Incorrect information.</p>
6.	Special Character Area
6.1	<p>I support the amendments to Map 3. It is suggested that the Parish Council and Examiner look carefully at the landscape framework on the north side of The Street and define on the Map the hedgerow (<i>south of the village pond</i>) and any trees of importance.</p> <p>Concern – Need to ensure a consistent approach to the definition of the landscape framework of the Special Character Area.</p>
7.	Sport and Leisure Facilities
7.1	<p>It is so disappointing that the Parish Council feels unable to include a policy on sport and recreation facilities within the NP Review or define our recreation ground or introduce measures to improve accessibility and rights of way. The negative responses to the relevant questions I have raised tells its own story and how we have moved from exciting proposals for a new playing field and village hall that the Parish Council was actively promoting some 18 months or so ago to absolutely nothing!</p> <p>Concern - Whilst the Examiner may determine that the basic conditions have been met and Babergh District Council will happily endorse the Plan, the health and well-being of local residents is in my view being seriously compromised for another decade or so by apathy and inaction.</p> <p>Does Lawshall meet the standards that Babergh District Council endorsed in its Babergh and Mid Suffolk Open Space Assessment 2016-2036 (May 2019)? https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Babergh-and-Mid-Suffolk-Open-Space-Study-May-2019.pdf</p>

[Refer existing provision tables on pages 53, 56 & 85 along with reference to the gaps in ROW provision on page 104]



It is so sad that the Parish Council do not wish to include a policy for Sport and Recreation even though the community has highlighted the need for better sports facilities

8. Corner Farm (M G T Suffolk Ltd - Road Haulage Services)

8.1 Original Comment - 41.1. Considerable recent changes have taken place at Corner Farm (M G T Suffolk Ltd - Road Haulage Services) and it is rapidly taking on the appearance of a small industrial estate. The future planning of this area urgently needs to be addressed in the Plan Review.

PC response - It is not necessary for the neighbourhood plan to have a specific policy to cover Corner Farm

Proposed changes - None

Concern - Even over the last six months there has been a dramatic change in the appearance and site operations on this expanding Employment Site. It is an important issue, and I remain concerned that a proper planning justification has not been provided by the Parish Council establishing why it is inappropriate to have a specific policy and land use designation for the Corner Farm site?





Corner Farm now has the appearance of a small industrial estate

9. Community Infrastructure Levy (CIL) and Project Funding

9.1 Original Comment - 44.1. The Parish Council should include a section on "Community Infrastructure Levy (CIL) and Project Funding" and list those projects that the Parish Council anticipates undertaking over the course of the Plan period. "Infrastructure" for the purposes of CIL has a wide-ranging meaning but includes - Sporting, recreation and leisure facilities; Open spaces; and Digital networks (e.g. broadband). Source: - Neighbourhood Planning Support: Understanding Community Infrastructure Levy (CIL) - <https://neighbourhoodplanning.org/toolkits-andguidance/understanding-community-infrastructure-levy-cil/> .

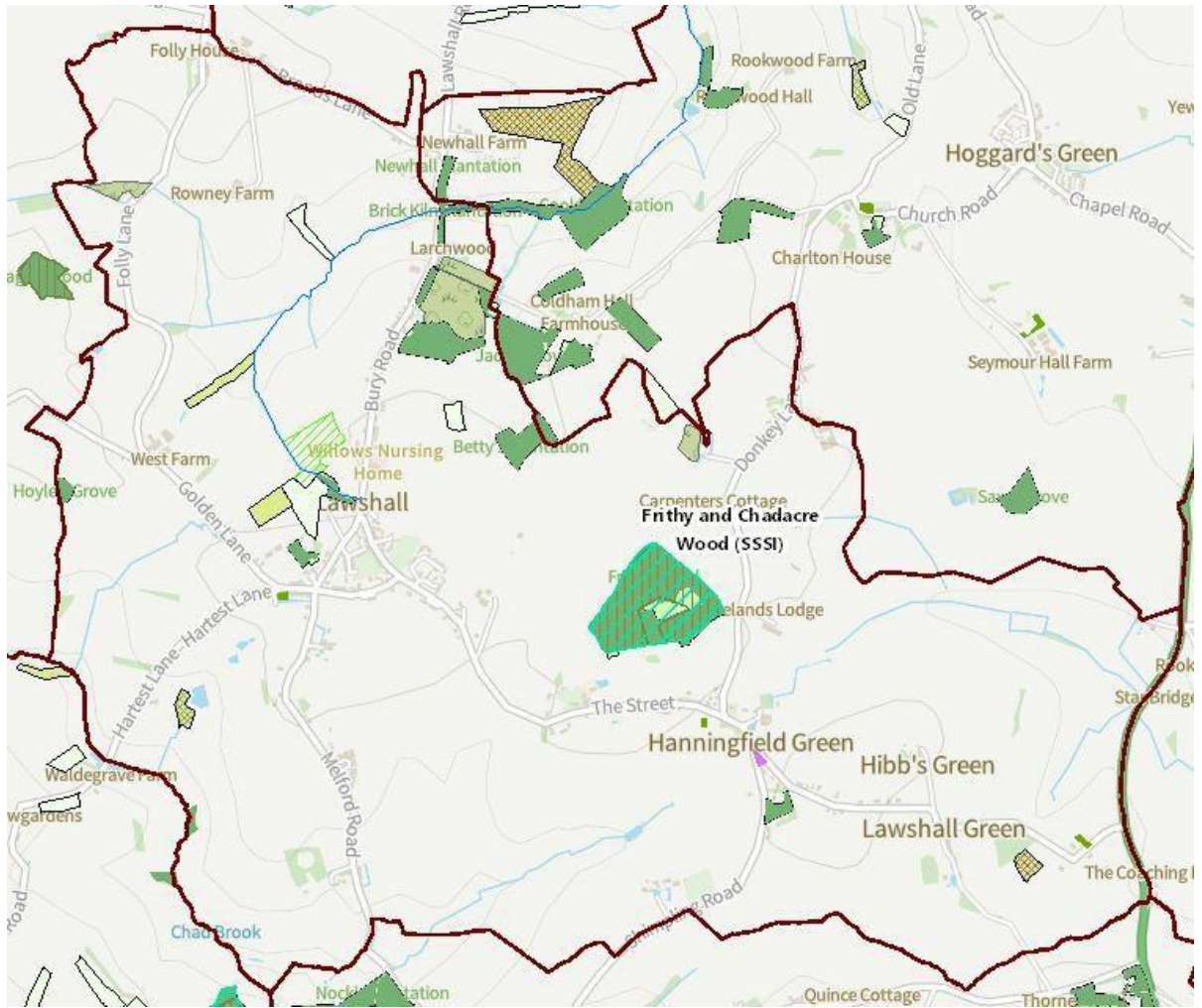
PC response - This is not considered necessary in order for the Plan to meet the Basic Conditions.

Concern - The Parish Council currently has a wonderful opportunity to follow good practice. It is deeply concerning that responses to both myself, and many others, are being made without any informed feedback. In my view it is pointless for respondents to make well researched comments on the NP Review if the Parish Council are unwilling to provide a properly reasoned and justified response. There are many other instances where important issues are being "batted away" with simple responses such as "noted", "this is not considered necessary" and "this is not relevant".

10. Matters relating to the Policies Maps


10.1 Three entries on the Policies Map Key need to be renumbered:

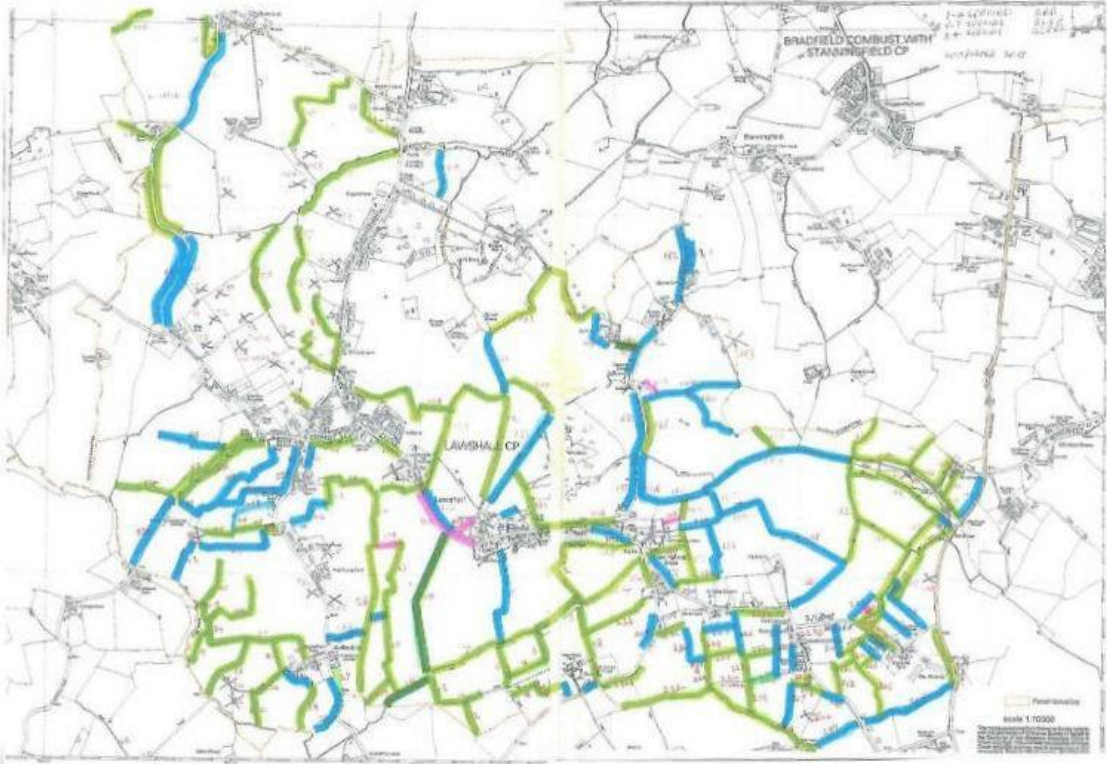


	<ul style="list-style-type: none"> - Lawshall Street Special Character Area (LWL14) - Community Facility (LWL18) - Public Right of Way (LWL19) <p>This reflects the unfortunate deletion of Policy LWL14 covering Buildings and Structures of Local Significance.</p> <p>Concern – Incorrect information.</p>
10.2	<p>A small part of Inset 4 needs to be duplicated in the south-east corner of Inset 3 showing a small portion of Local Green Space LWL10-6 along with View 17.</p> <p>Concern – To overcome a minor conflict between the two Policies Maps.</p>
11.	Biodiversity
11.1	I am very pleased to note that the Parish Council has amended Policy LWL11 in accordance with my representation.
11.2	<p>This is tempered with disappointment with regard to the PC's negative response and attitude towards other biodiversity issues that I have raised covering:</p> <ul style="list-style-type: none"> - Frithy Wood SSSI - wildlife corridors - priority habitats - woodland areas - woodpasture and parkland
11.3	<p>The NP Review is weak in terms of identifying and protecting our biodiversity resource and compares unfavourable with other neighbourhood plans (<i>such as Hoxne</i>) that has a strong biodiversity content and supporting documentation. Refer: https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Hoxne-NP-SD8-Landscape-Biodiversity-Evaluation.pdf</p>
11.4	<p>The omission of a supporting Biodiversity Evaluation Report / Ecological Assessment / Parish Biodiversity Action Plan with the NP Review is disappointing and fails to recognise the national concerns expressed by Sir David Attenborough and others highlighting that "nature is in crisis" and the desire for local action. I have become increasingly concerned that some Parish Councils may choose [<i>perhaps on the grounds of financial expediency or insufficient time</i>] not to use or give any weight to the relevant biodiversity guidance and tools at their disposal. Biodiversity regrettably appears to still remain a soft option that may give rise to negative responses both from Parish Councils and their professional advisors.</p>
11.5	<p>In contrast as individuals we all care about biodiversity – planning officers, district councillors, parish councillors and local residents – but sadly we do not care enough to make sure that our Neighbourhood Development Plans deliver a sound biodiversity base.</p>
11.6	<p>I have tried really hard to promote good practice for biodiversity, both in Lawshall and across all parishes in Suffolk, by producing a Parish Biodiversity Statement. I attach an updated version of the Lawshall Biodiversity Statement for your information, the earlier version having been considered by the Parish Council in January 2023.</p>



The NP Review completely fails to identify Priority Habitats both within the Plan itself and supporting documentation [Above figure taken from Magic Map]

11.7	<p>Concern - I am concerned that the NP Review</p> <ul style="list-style-type: none"> - fails to recognise or relate to national concerns that “nature is in crisis”. - does not give proper regard to the challenge of climate change and its implications for biodiversity. - does not provide up-to-date biodiversity information, including data on priority species. - does not provide evidence that it is accurately assessing and promoting “the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species.” [in accordance with the relevant paragraphs of the National Planning Policy Framework]
11.8	<p>My greatest concern however lies with the elected members of Babergh District Council and Mid Suffolk District Council who are generally adopting (making) Neighbourhood Plans with a weak biodiversity base.</p>
11.9	<p>In political terms the Green Party (which plays a key role in both Councils) in my view is not following its emerging party policies and doctrines with respect to biodiversity:</p>

	<p>“WH106 Regional and local nature regeneration plans will be implemented by local authorities in collaboration with parish and town councils, local NGOs involved in nature conservation, local businesses (including agriculture) and local communities, with representation of citizens. Plans will fulfil the targets set by the Commission for Nature, helping create a nature regeneration network protected by the Rights of Nature Act and recognised in the National Planning Policy Framework.”</p> <p>https://policy.greenparty.org.uk/our-policies/long-term-goals/wildlife-and-habitats/</p>
11.10	<p>The two local authorities represent a sound political testing ground, and it is hard to understand why Babergh District Council and the Green Party in particular is <u>not</u>:</p> <ul style="list-style-type: none"> - seeking additional resources for biodiversity? - securing key officer support to help Parish and Town Councils ensure that biodiversity forms the backbone of all Neighbourhood Plans in the respective Districts? - establishing a well thought through protocol covering biodiversity in Neighbourhood Plans? - refusing to adopt Neighbourhood Plans with weak biodiversity coverage?
	
	<p>An area of Deciduous Woodland (Priority Habitat) that has not been delineated or recognised in the NP Review</p>
11.11	<p>The Suffolk Wildlife Trust has undertaken a great deal of work enabling communities to focus on wildlife and the environment in their NPs.</p> <p>https://www.suffolkwildlifetrust.org/wilder-planning</p> <p>https://www.suffolkwildlifetrust.org/news/local-communities-must-be-allowed-voice-their-support-nature-neighbourhood-plans</p>

11.12	<p>I appreciate that District Councils across Suffolk are currently coordinating actions to achieve biodiversity net gain</p> <p>https://www.eastsuffolk.gov.uk/assets/Planning/Design-and-Conservation/Biodiversity-Net-Gain/BNG-Guidance-Document-V10-Final.pdf</p>
11.13	<p>This work would be greatly enhanced if Parish and Town Councils in their Neighbourhood Plans properly evaluated their biodiversity resource and at the same time identified areas for wildlife enhancements.</p>
	
	<p>No attempt has been made to identify our parish hedgerow network and wildlife corridors in the NP Review or supporting documentation. Recent experience has shown that threats do exist.</p>
11.14	<p>Opportunity - Lawshall Parish Council in the context of their NP Review (<i>in terms of an effective community action</i>) still has time to adopt a proper commitment to evaluating, safeguarding and improving the biodiversity resource of the parish. The work of the Green Light Trust and others in the parish would represent an excellent starting point.</p>
	<p>14th September 2023</p>
	<p><i>Richard Livall</i>  <i>Lawshall</i> <i>Bury St Edmunds</i> <i>Suffolk</i>  <i>Email: xxxxxxxxxxx</i></p>

For the attention of Mrs Whordley – Chair of Lawshall Parish Council

Lawshall Biodiversity Statement

1. Introduction

1.1 I have had the pleasure of making detailed comments on the Lawshall Neighbourhood Plan Review 2021-2037 Pre-Submission Stage Consultation Draft Plan (October 2022) in which I made some submissions on biodiversity. This included:

*“15.1. A paragraph should be incorporated in the Plan Review acknowledging **the importance of wildlife corridors linking the main habitats in the parish.**”*

“15.2. The opportunity now exists to improve and fine-tune the wording of Policy LWL 11 to make it all-encompassing so that it is covering much more than “important woodland and ancient hedgerows”. It is suggested that the first sentence of Policy LWL 11 is retained, and the second sentence is deleted and replaced as detailed below:

Existing: “The important woodland and ancient hedgerows, shown on the Policies Map, are valued highly by the community and are to be protected. Any development proposal which would result in their loss should demonstrate that exceptional circumstances exist that justify such a loss.”

*Amended wording: “The important woodland and ancient hedgerows, shown on the Policies Map, are valued highly by the community and are to be protected. **Proposals that are likely to have an adverse impact on designated sites, priority habitats, wildlife corridors and protected or priority species will not normally be permitted except where it can satisfactorily be demonstrated that the benefits of the development clearly outweigh any adverse impact.**”*

1.2 I also made various submissions suggesting Local Green Space designations, Important Woodland designations, Woodpasture and Parkland BAP Priority Habitat recognition and an SSSI notation.

1.3 In order to consider and respond to these issues, it does take us into quite difficult territory as to whether the Lawshall Parish Council (*along with most other Parish Councils*) are currently able to meet their legal duties with respect to biodiversity?

How can the Parish Council protect wildlife corridors and steppingstones in Lawshall when it has not identified where they are located? Similarly, where are the Priority Habitats in the parish? What Protected and Priority Species are prevalent? These and other important biodiversity issues should be seamlessly incorporated into a Parish Biodiversity Action Plan which can then form a key Appendix to the Lawshall Neighbourhood Plan Review and provide informed supporting evidence.

2. Duty to conserve biodiversity

2.1	<p>The Natural Environment and Rural Communities Act 2006 states that “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.”</p> <p>https://www.legislation.gov.uk/ukpga/2006/16/part/3/crossheading/biodiversity/2013-09-01?view=plain</p> <p><i>“All public bodies have a statutory duty to have regard to the conservation of biodiversity, as set out in the Natural Environment and Rural Communities (NERC) Act 2006. The Act also requires the publication of lists of living organisms and types of habitat which in the Secretary of State’s opinion are of principal importance for the purpose of conserving biodiversity. There are 262 priority species and 23 priority habitats in Suffolk.”</i></p> <p>https://www.suffolk.gov.uk/asset-library/imported/suffolks-nature-strategy-2015.pdf</p> <p>The NERC Act requires all Local Authorities to be able to show that:</p> <ul style="list-style-type: none"> • Biodiversity and conservation are integrated throughout all policies and activities across the Council • All staff, managers and Councillors understand how biodiversity issues relate to their decisions and actions • All biodiversity, especially species and habitats of principal importance, are protected and enhanced • It provides sustained support to local biodiversity initiatives • It has access to up-to-date biodiversity information and professional ecological expertise • It reports on progress towards and demonstrates progress against, national and local biodiversity targets <p>https://southribble.gov.uk/media/1896/Biodiversity-Strategy-2022/pdf/Biodiversity_Strategy_v2_1.pdf?m=637945135425700000</p>
2.2	<p>The Lawton Report ‘Making Space for Nature’ (2010) gave principal recommendations for England as being to:</p> <ul style="list-style-type: none"> • Improve the quality of current wildlife sites by better habitat management • Increase the size of existing wildlife sites • Enhance connections between sites, either through physical corridors or through ‘steppingstones’ • Create new sites • Reduce the pressure on wildlife by improving the wider environment <p>https://naturalengland.blog.gov.uk/2020/09/16/making-space-for-nature-10-years-on/ https://www.stroud.gov.uk/media/241279/hardwicke-ndp-ecological-assessment.pdf</p>

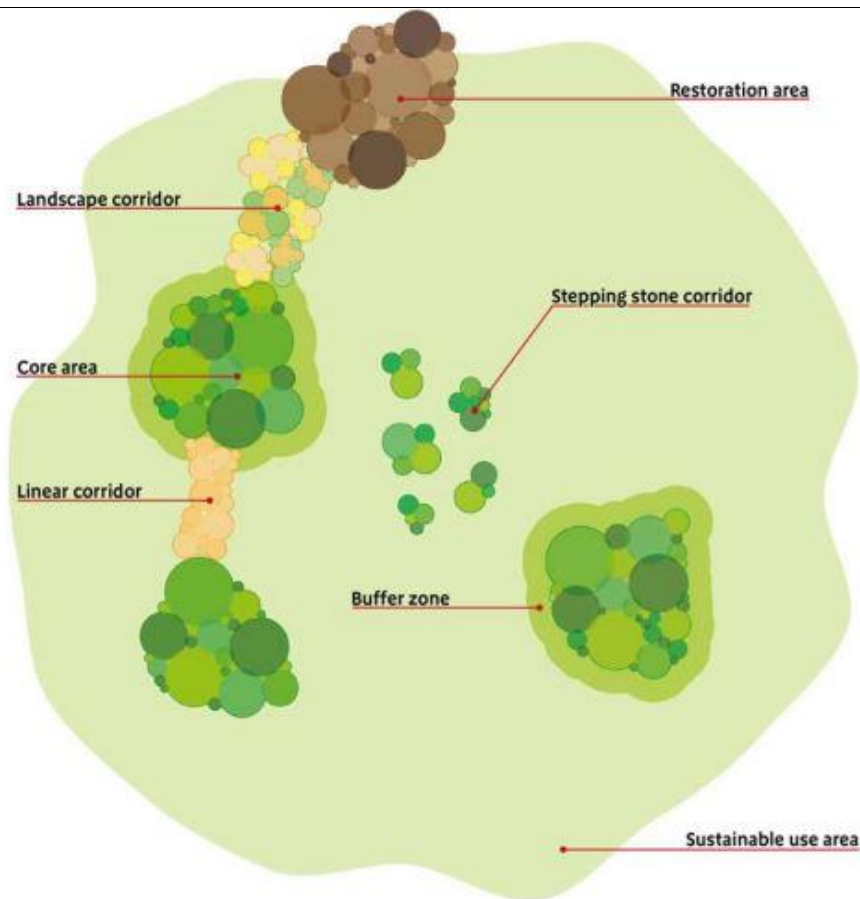


Figure 1. The components of ecological networks (Making Space for Nature report)

2.3 The principles of creating coherent ecological networks have been embedded within many planning and policy documents:

- The Natural Environment White Paper ‘The Natural Choice’ (2011)
<https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature>
- Biodiversity 2020 ‘Strategy for England’s Wildlife and Ecosystem Services’ (2011)
<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>
- National Planning Policy Framework (NPPF) (2012) (refer current 2021 version)
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
[https://www.wealden.gov.uk/UploadedFiles/Hellingly Topic Paper 3 Biodiversity Paper 3-1.pdf](https://www.wealden.gov.uk/UploadedFiles/Hellingly%20Topic%20Paper%203%20Biodiversity%20Paper%203-1.pdf)

3. National Planning Policy Framework 2021

3.1 National Planning Policy Framework 2021 (pages 50-54) - 15. Conserving and enhancing the natural environment – states:

“Habitats and biodiversity –

179. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for*

	<p><i>biodiversity; wildlife corridors and steppingstones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and</i></p> <p><i>b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”</i></p> <p>https://www.gov.uk/government/publications/national-planning-policy-framework--2</p>
3.2	<p>Other sections of the NPPF are also of relevance, namely Paras 8, 28, 31, 174, 175 and 179. In particular, I highlight:</p> <p>“Preparing and reviewing plans</p> <p><i>Para. 31. “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.”</i></p> <p>I refer to the excellent summary by the Worcestershire Wildlife Trust using the link below. https://www.worcswildlifetrust.co.uk/sites/default/files/2021-08/Biodiversity%20in%20the%20NPPF%20update%202021.pdf</p>
3.3	<p>From the above we can elicit that Neighbourhood plans are required to identify, map and safeguard components of local wildlife rich habitats and wider ecological networks including locally designated sites of importance for biodiversity, wildlife corridors and steppingstones that connect them. To meet this requirement, it is obviously necessary to provide details of the local habitats and networks backed up by survey evidence.</p>
3.4	<p>Neighbourhood Planning Guidance does not refer to biodiversity but highlights that <i>“the National Planning Policy Framework is the main document setting out the government’s planning policies for England and how these are expected to be applied.”</i></p> <p>https://www.gov.uk/guidance/neighbourhood-planning--2#evidence-to-support-a-neighbourhood-plan</p> <p>The Guidance does cross-reference to Plan-making Guidance (published 13 September 2018). https://www.gov.uk/guidance/plan-making</p> <p>I quote the following key paragraph from this guidance:</p> <p>What evidence might be needed to plan for the natural environment and biodiversity?</p> <p><i>All planning policies and decisions need to be based on up-to date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans, Areas of Outstanding Natural Beauty Management Plans, Green Infrastructure Plans (including environmental net gain and Nature Recovery Networks), Tree and Woodland Strategies, and landscape character assessments. Working with Local Nature Partnerships and other public bodies where appropriate, this should include an assessment of existing and potential components of ecological networks, biodiversity resources and landscapes.”</i></p>
4.	Ensuring that wildlife and the environment are protected and enhanced within your Neighbourhood Plan

4.1	<p>Suffolk’s Nature Strategy 2015 states <i>“Suffolk’s Biodiversity Action Plan (BAP), which comprises our list of priority species and habitats, is [should be] embedded in local planning policies. Impacts on legally protected species are a material consideration in the planning process whilst impacts on priority species and habitats are also capable of being material considerations. The National Planning Policy Framework (NPPF) includes a range of requirements to conserve and enhance the natural environment as well as requiring local plans to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations.”</i></p> <p>https://www.suffolk.gov.uk/asset-library/imported/suffolks-nature-strategy-2015.pdf</p>
4.2	<p>The Strategy goes on to state that <i>“By [2018], all Neighbourhood Development Plans and Parish Plans should ensure the natural environment is fully considered. They should maximise opportunities to conserve, enhance and link Suffolk’s green and natural spaces.”</i></p> <p>https://www.suffolk.gov.uk/asset-library/imported/suffolks-nature-strategy-2015.pdf</p>
4.3	<p>The Suffolk Wildlife Trust establish that Neighbourhood Plans should:</p> <ul style="list-style-type: none"> • Highlight what wildlife and the environment means to people in your parish • Map the biodiversity assets of your parish such as greenspace, hedgerows, ponds and the presence of certain species • Protect and enhance existing green space in your parish for wildlife, such as parks, nature reserves and County Wildlife Sites • Ensure that space for nature is integral to new development in your parish with wildlife friendly landscaping, Sustainable Drainage Systems (SuDS) and green space • Identify where green corridors could be created to link existing green space for people and wildlife and add to the Nature Recovery Network • Target Biodiversity Net Gain from development to key biodiversity assets and species within your parish • Help improve health and wellbeing in your parish through improved access to nature and greenspace • Help improve the resilience of your community to climate change” <p>https://www.suffolkwildlifetrust.org/wilder-planning</p>
4.4	<p>The Suffolk Wildlife Trust have also put forward the following measures:</p> <p><i>“1. Evidence – Get information about the habitats and species in your parish, by requesting the records for your parish from Suffolk Biodiversity Information Service. Ensure you request information on where the County Wildlife Sites are in your parish and why they are designated as regionally important. To find information on Priority habitats, land in conservation management (i.e., Agri-environment schemes) and designated sites in your parish, such as Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), go to the Natural England mapping tool MAGIC maps.</i></p>

	<p>2. Survey your local area – Some areas of the county will have limited records of species and habitats, but local people can add to this knowledge. Encourage local people to get out surveying species and identifying key habitats for wildlife across your parish.</p> <p>3. Map the Biodiversity Assets of your parish – Map all the known habitats (e.g., ponds, woodlands, hedgerows, grasslands, heathlands, wetlands, rivers), land in conservation management, local green space and designated sites including County Wildlife Sites, Roadside Nature Reserves, SSSIs, SACs and SPAs. Look at where the core areas for wildlife are in your parish, for example where there is a grouping of important habitats or a corridor where wildlife habitats are linked such as along a river corridor.</p> <p>4. Map the Green Corridors in your parish – Your Biodiversity Assets map will show you where the habitats are that need protecting in your parish. You can also consider where existing biodiversity assets could be enhanced by improving management for wildlife, buffered by creating new habitats between designated habitats and new development or agriculture, or linked by adding hedgerows, scrub or unmown grass margins between existing habitats. This will all form the basis of a Green Corridors map of your parish. Make sure to consider how habitats in neighbouring parishes link into habitats in your parish. If you don't know where to start take a look at the National Habitat Network Maps in MAGIC maps to see where habitat creation would be best targeted in your parish.</p> <p>5. Add these maps to your Neighbourhood Plan – point developers to them, so that any habitat creation or enhancement required for Biodiversity Net Gain in your parish is targeted to where you want it and where it will provide the greatest benefits for wildlife. Encourage development in your parish to improve Green Corridors for people and wildlife.</p> <p>6. Highlight the key species in your parish so that developers can focus enhancement for wildlife on these species– for example, if you have great populations of swifts and hazel dormouse in your parish you will want developments to include swift boxes and native hedgerow and scrub planting which improves links for hazel dormouse across the parish.</p> <p>7. Require wildlife friendly lighting for all development.</p> <p>8. Include an ambition for 20% Biodiversity Net Gain in your parish.</p> <p>9. Highlight the health and wellbeing benefits of improved access to nature for local people.” https://www.suffolkwildlifetrust.org/wilder-planning</p>
4.5	<p>The Suffolk Wildlife Trust share my desire to see Neighbourhood Plans across Suffolk embed policies and measures to increase and connect locally important wildlife habitats as part of wider efforts to reverse wildlife loss. The SWT would support and encourage efforts by parish councils and local people to identify areas where wildlife habitats could be created and enhanced to provide wildlife corridors and increase biodiversity. Their Wilder Ecology ecological consultancy conducted a Landscape and Biodiversity Evaluation for parish councils as part of the development of the NP. This identified the parish’s priority habitats and species and connectivity between wildlife habitats.</p> <p>Examples - Hoxne Neighbourhood Plan: Landscape and Biodiversity Evaluation 2021 https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Hoxne-NP-SD8-Landscape-Biodiversity-Evaluation.pdf</p> <p>Wherstead Neighbourhood Plan: Landscape and Biodiversity Evaluation 2021 https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Wherstead-NP-Landscape-Wildlife-Evaluation.pdf</p>

	<p>The SWT are able to explain to communities how their Neighbourhood Plan can do more to incorporate aspirations and opportunities for increasing and enhancing biodiversity in the parish.</p> <p>https://www.suffolkwildlifetrust.org/contact</p>
5.	Ecological Networks
5.1	<p>The local natural environment contains a number of disconnected places: gardens, parks, playing fields, farmland, woodland, grassland and wetlands. It should be considered not just as isolated spots of green but a potentially thriving network linking wildlife sites across these environments. Important habitat can also be found in neighbouring parishes and on undisturbed road verges.</p>
5.2	<p>Neighbourhood Planning provides an important opportunity for communities to shape their local environment for future generations. Through identifying and evaluating opportunities and constraints, local communities can take an informed position and become better able to protect their valuable natural assets.</p>
5.3	<p>England’s wildlife habitats have become increasingly fragmented and isolated, leading to declines in the provision of some ecosystem services, and losses to species populations. Ecological networks have become widely recognised as an effective way to conserve wildlife in environments that have become fragmented by human activities. Ecological networks generally have five components which reflect both existing and potential ecological importance and function:</p> <ul style="list-style-type: none"> • Core areas • Corridors and steppingstones • Restoration areas • Buffer zones • Sustainable use areas <p>https://www.gov.uk/government/publications/nature-improvement-areas-improved-ecological-networks/nature-improvement-areas-about-the-programme http://www.willaston-np.org.uk/files/Protecting_and_Enhancing_Willaston_Natural_Environment.pdf</p>
	<i>Habitat Connectivity</i>
5.4	<p>The National Planning Policy Framework recognises the need for, and the implementation of landscape habitat connectivity. However, the NPPF does not specify how this should be done.</p>
5.5	<p>The main habitat groups identified for the connectivity mapping include:</p> <ul style="list-style-type: none"> • Woodlands; including semi-natural, broad-leaved plantation and scrub land • Priority grasslands; namely all grasslands that have not been agriculturally improved • Standing water and habitats associated with marshy conditions, ponds and marsh • Intact hedgerows and trees
5.6	<p>Connectivity mapping shows where there are opportunities for improving connections between similar types of habitats. Conversely the mapping can be used to assess the possible impact of development on existing habitats and where these can be offset or avoided altogether.</p> <p>https://www.alcester-tc.gov.uk/wp-content/uploads/2018/10/Alcester-Ecological-Report-Aug-2018.pdf</p>

6.	Habitat datasets assessed (mapping as appropriate)
6.1	<p>These can include:</p> <ul style="list-style-type: none"> • Sites of Special Scientific Interest (Designated statutory sites) • County Wildlife Sites (Designated non-statutory sites) • Other Sites of Wildlife Interest • Unconfirmed Wildlife Sites • Potential Wildlife Sites • Local Nature Reserves • Ancient Woodland Inventory • Ancient Hedgerows and Species-Rich Hedgerows • Commons and Access Land • Land within Agri-environment schemes • Traditional Orchards (PTES Orchard Survey) • Veteran Trees • Protected Wildflower Verges • Important Bird Areas • Invertebrate Site Register Locations • Google Earth - such as unrecorded Semi-Natural Habitats <p> https://www.suffolkbis.org.uk/ https://magic.defra.gov.uk/magicmap.aspx https://www.acraew.org.uk/commissioners-decisions/suffolk https://www.dbrc.org.uk/neighbourhood-plans/ https://almeleypc.org/wp-content/uploads/2018/07/Almeley-Parish-Council-Nature-Conservation-Plan-June-2018.pdf </p>
7.	Priority Habitats (mapping as appropriate)
7.1	<p>These can include:</p> <ul style="list-style-type: none"> • Ancient Woodland • Arable field margins • Hedgerows • Lowland calcareous grasslands • Lowland meadows • Lowland mixed deciduous woodlands • Ponds • Rivers and streams • Traditional orchards • Wood pastures and parklands <p><i>Wider Countryside</i></p> <ul style="list-style-type: none"> • Farmland • Improved grassland • Road verges (important for providing linkage between habitats)

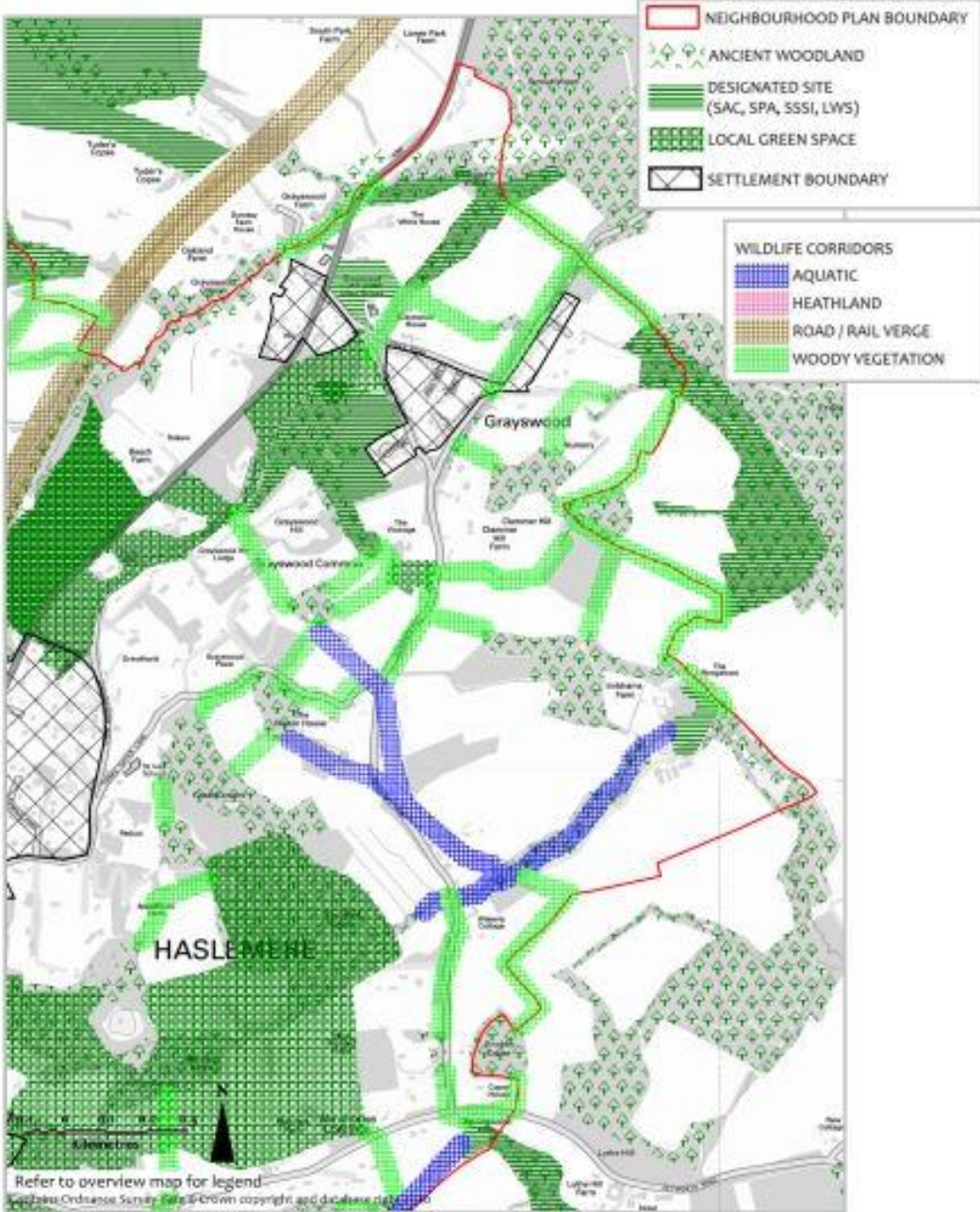
	<ul style="list-style-type: none"> • Riverbanks (provide important links between habitats) <p><i>Built Environment - Towns and Villages</i></p> <ul style="list-style-type: none"> • Gardens and Allotments • Parks, Recreation Sites and playing fields • Churches and Churchyards <p>https://www.suffolkbis.org.uk/habitat</p>
8.	Protected and Notable Species
8.1	<p>Species of Principle Importance (Section 41 NERC Act 2006) – the most important species for the purpose of conserving biodiversity.</p> <p>Suffolk Priority Species https://www.suffolkbis.org.uk/species</p>
9.	Key Priorities
9.1	<p>Priorities and actions to protect and enhance biodiversity include:</p> <ul style="list-style-type: none"> • Designated sites, protected species and ancient or species-rich hedgerows, grasslands, woodlands, traditional orchards and watercourses will be protected. • Ecological networks, and the migration of flora and fauna, through creating and protecting buffer zones around important wildlife rich sites will be protected and preserved. • Ancient trees or trees of arboricultural value will be retained and protected • The mitigation, preservation, restoration and recreation of wildlife habitats, and the protection and recovery of priority species will be promoted • Providing a net gain in flora and fauna, particularly in the areas defined on the Natural Assets Map (using the DEFRA biodiversity metric.) <p>https://almeyleypc.org/wp-content/uploads/2018/07/Almeley-Parish-Council-Nature-Conservation-Plan-June-2018.pdf https://www.gov.uk/guidance/biodiversity-metric-calculate-the-biodiversity-net-gain-of-a-project-or-development</p>
9.2	<p>More detailed priorities and actions:</p> <ul style="list-style-type: none"> • Undertake a phase one survey of the whole neighbourhood plan area, including hedgerows and ponds. Ensure all results are submitted to the Suffolk Biodiversity Information Service. • Identify habitats that require further / more detailed survey. Ensure all results are submitted to the Suffolk Biodiversity Information Service. • Undertake more comprehensive recording of species within the neighbourhood plan area. Promote the online recording system iRecord within the local community to encourage awareness of the local area’s biodiversity and support the incidental recording of wildlife. • Following on from previous survey work identify the need for any ongoing monitoring programmes. <p>https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_3_Biodiversity_Paper_3-1.pdf</p>
9.3	<ul style="list-style-type: none"> • Creation of more connection between woodlands using hedgerows and shaws. This could include improved management of existing hedgerows as well as creation of new hedgerows.

	<ul style="list-style-type: none"> • Creation and restoration of more ponds, seasonal standing water such as wader scrapes, and wetland habitats. • Creation of community orchards with access to nature around urban areas for local people • Work with Buglife to enhance pollinator and unimproved grassland networks <p>https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_3_Biodiversity_Paper_3-1.pdf</p>
9.4	<ul style="list-style-type: none"> • Improve the quality of the ‘wildlife corridor network’ and assess against Local Wildlife Site selection criteria. • Protect, enhance and connect areas of high/medium value which lie outside the wildlife corridor. <p>http://www.willaston-np.org.uk/files/Protecting_and_Enhancing_Willaston_Natural_Environment.pdf</p>
9.5	<p>Further possible actions:</p> <ul style="list-style-type: none"> • Improve the management of gardens so that they are more sympathetic to wildlife. • Improve the value of open spaces for wildlife and to establish wildlife corridors. • Manage trees to support wildlife, control pollution, moderate temperatures and provide shelter. • Maintain and enhance the churchyard to support local flora and fauna. • Improve the value of the countryside for wildlife. • Increase wetland biodiversity. • Improve the wildlife habitat and floral diversity alongside roads. • Improve cover for nesting birds and maintain a network for wildlife between sites. • Preserve the natural ancient woodland habitat. • Enhance species rich priority habitats, to improve their status for wildlife and support the ecological network. • Improve residents’ knowledge of local wildlife. • Promote biodiversity and its conservation to the public, landowners, land managers and decision makers. <p>http://www.horndeanbiodiversity.co.uk/files/Horndean%20Biodiversity%20Action%20Plan.pdf</p>
10.	Mapping Biodiversity in your Local Area
10.1	<ol style="list-style-type: none"> 1. Map the existing known habitats and designated sites in your parish or Neighbourhood Plan area. [Refer https://www.suffolkbis.org.uk/] 2. Add local knowledge to the map through local species recording groups and organised surveys. 3. Identify clusters of habitats and sites which form core areas i.e. areas where there are a few designated sites grouped together with other key wildlife habitats such as BAP priority habitats, ancient woodland or land in positive conservation management such as through agri-environment schemes. 4. Identify where links can be formed between core areas. This will also be partly subjective and partly objective depending on the detail of the maps. 5. The links between blocks of habitat within core areas and between core areas may be direct physical links (corridors) but might also be steppingstone blocks of habitat. Many species are able to cross gaps between blocks of suitable habitat, but their ability to do so depends on the distance involved, the type of land-use between the habitat blocks and the characteristics of the species concerned. <p>https://sussexwildlifetrust.org.uk/discover/planning/strategic-planning/neighbourhood-plans/how-to-include-wildlife-in-neighbourhood-plans/mapping-biodiversity-in-your-local-area</p>
10.2	<p>Suffolk Ecological Networks Project Mapping Methodology</p> <p>https://www.suffolkbis.org.uk/sites/default/files/2022-05/Ecological%20Networks%20Methodology%202007_0.pdf</p>

10.3	<p>A number of different forms of Biodiversity Maps can be viewed within Neighbourhood Plan documentation and Parish Biodiversity Action Plans. Examples include:</p> <ul style="list-style-type: none"> • Designated Areas of Conservation Interest • Areas of Habitat Important to Wildlife • Landcover Habitat Types • Principal Hedgerow Structure • Observed Wildlife Corridors <p>https://mylorflushingplan.uk/wp-content/uploads/2020/07/EB05-Wildlife-as-pdf.pdf</p> <ul style="list-style-type: none"> • Habitats of Principal Importance [<i>Priority habitat – Natural England 2014</i>] • Land Cover Habitats [<i>Land Cover Map 2007</i>] • Agricultural Land Classification [<i>Agricultural land grading</i>] • Designated Sites [<i>Protected sites for nature conservation, including international, European, national and local sites</i>] • Habitat Distinctiveness • Indicative Wildlife Corridors <p>http://www.willaston-np.org.uk/files/Protecting_and_Enhancing_Willaston_Natural_Environment.pdf</p> <ul style="list-style-type: none"> • Green Infrastructure Biodiversity Network Map • Ecological Networks and Habitat Opportunity Maps <p>https://www.northamptonshire.gov.uk/councilservices/environment-and-planning/planning/planning-policy/archaeology-biodiversity-and-landscape/documents/PDF%20Documents/Northamptonshire%20BAP%202015-2020.pdf</p> <ul style="list-style-type: none"> • Indicative Green Corridors <p>https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Oulton/Oulton-Neighbourhood-Plan-Referendum-Version.pdf</p> <ul style="list-style-type: none"> • Landscape & Wildlife Evaluation Report <p>https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Wherstead-NP-Landscape-Wildlife-Evaluation.pdf</p> <ul style="list-style-type: none"> • Statutory & non-statutory designated wildlife sites and Biodiversity Opportunity Areas • Overview map of wildlife corridors connecting designated wildlife sites • Opportunities / Additional information / Potential Partners schedule <p>https://www.waverley.gov.uk/Portals/0/Documents/services/planning-and-building/planning-strategies-and-policies/neighbourhood-planning/Haslemere%20Neighbourhood%20Plan%20Final.pdf?ver=rWc_AN6QSsFOcqeZfGeVdQ%3d%3d</p> <ul style="list-style-type: none"> • Wildlife corridor maps and descriptions <p>https://www.waverley.gov.uk/Portals/0/Documents/services/planning-and-building/planning-strategies-and-policies/neighbourhood-planning/Haslemere%20Neighbourhood%20Plan%20Final%20%20Appendices%201%20-%203.pdf?ver=Ed5XMjSW84fJVxzB3uoe5w%3d%3d</p>
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Map 6 (Grayswood and Haslemere North East)

An extensive network of hedgerow corridors link to ancient woodland (including Grayswood Common, Imbhams and Frillinghurst Wood SNCIs) outside of the settlement boundaries. These corridors are important for dormice (from Grayswood to Imbhams) and bats (Grayswood to Swan Barn and Swan Barn to Imbhams). These corridors are perhaps the most important in Haslemere for bats, supporting a high number of bat species, including several rare bats and include a riparian corridor between Swan Barn and Imbhams, a headwater to the River Arun.



Refer to overview map for legend
 Ordnance Survey, Crown copyright, and database right
 These maps have been produced using data from Surrey Biodiversity Information Centre, Sussex Biodiversity Record Centre, Hampshire Biodiversity Information Centre and Natural England.

	<p>Excellent extract above from the Haslemere Neighbourhood Plan Final Appendices. In total Appendix 3 has nine Wildlife Corridor Maps.</p> <p>Work in progress:</p> <ul style="list-style-type: none"> • Wildlife Network Map https://www.babergh.gov.uk/environment/climate-change/babergh-pledges-to-protect-wildlife/ <p>I attach an Appendix with many data sources, a number of which include examples of Biodiversity Mapping.</p>
11.	Other Biodiversity Possibilities
11.1	<p>There appear to be a range of other important Biodiversity Concepts and Initiatives that Parish Councils can address:</p> <ul style="list-style-type: none"> • Biodiversity or Geodiversity Assessment https://www.midsuffolk.gov.uk/assets/DM-Planning-Uploads/Validation-and-additional-guidance/Suffolk-Biodiversity-Validation-Requirements.pdf • Biodiversity Net Gain https://bucks.mknep.co.uk/biodiversity-net-gain/ https://beta.bathnes.gov.uk/biodiversity-net-gain https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/314723.pdf • Green Infrastructure <i>Green Infrastructure (GI) provides a framework to guide and prioritise habitat restoration and creation. One of the main principles behind the GI framework is to provide a network of greenspace from high-use amenity land through to wilderness areas. It also seeks to link up areas of high biodiversity value into a continuous functioning network.</i> https://www.northamptonshire.gov.uk/councilservices/environment-and-planning/planning/planning-policy/archaeology-biodiversity-and-landscape/documents/PDF%20Documents/Northamptonshire%20BAP%202015-2020.pdf https://www.cravenc.gov.uk/planning/spatial-planning/spds-and-information/green-infrastructure-and-biodiversity/green-infrastructure-and-biodiversity-spd/ • Green-Blue Infrastructure https://www.surreycc.gov.uk/community/climate-change/what-are-we-doing/green-and-blue-infrastructure • Habitat and Species Action Plans https://www.norfolk-biodiversity.org/habitats-and-species/ • Local Nature Recovery Strategy https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network https://bucks.mknep.co.uk/nature-strategy/overview/ • Meeting the Challenge of Climate Change https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change

	<ul style="list-style-type: none"> • Nature Improvement Areas (perhaps scope at a parish level) https://www.gov.uk/government/publications/nature-improvement-areas-improved-ecological-networks/nature-improvement-areas-about-the-programme • Rewilding https://www.rewildingbritain.org.uk/blog/25-year-environment-plan-is-this-a-turning-point-for-rewilding
12.	Good Practice - Parish & Town Biodiversity Action Plans
	<i>Local action to improve biodiversity</i>
12.1	<p>A compelling case can be made that every Parish should be taking local action to improve biodiversity in their administrative area. Lawshall with the current excellent work undertaken by the Green Light Trust, Forest for our Children, local wildlife experts and community in general would appear to be in a much better position than most communities. However, despite this work our ecological networks and wildlife habitats remain a matter of concern and biodiversity appears to be in decline. I make the case that Lawshall Parish Council should prepare a Parish Biodiversity Action Plan that meets the Council’s legal duties under the Natural Environment and Rural Communities Act 2006 and also feeds seamlessly into the current Neighbourhood Plan Review. It would also enable the Parish Council to develop and improve Parish BAP best practice that other Parishes and Communities may wish to follow across Suffolk and the immediate region.</p>
12.2	<p>In another part of the country, South Gloucestershire Council (SGC) have undertaken sterling work in developing Local Biodiversity Action Plans. The Local Authority has recognised that wildlife needs protecting, and habitats need managing at a parish level. SGC state that “local communities can provide vital help by valuing, conserving and enhancing biodiversity in their local area. Deciding where to start can be a daunting prospect, so South Gloucestershire Council has developed a BAP for each parish and/or town, which outlines how you can help ... wildlife at a local community level. The Parish and Town BAP’s can help with efforts to secure a better local environment and contribute to the wider BAP for [the District]”.</p> <p>https://www.southglos.gov.uk//documents/Biodiversity-Action-Plan-2016-26.pdf https://www.southglos.gov.uk/environment-and-planning/countryside/wildlife/what-is-biodiversity/ https://beta.southglos.gov.uk/wp-content/uploads/Local-Nature-Action-Plans-guidance-for-town-and-parish-councils.pdf</p>
12.3	<p>Each BAP [<i>can</i>] suggest some projects under the biodiversity action section that help to:</p> <ul style="list-style-type: none"> • Improve the quality of existing habitats. • Create new habitat. • Link habitats. • Take part in landscape-scale conservation. • Engage people with nature.
12.4	<p>Examples of the abbreviated Parish BAPS produced by South Gloucestershire Council are provided below:</p> <p>Hawkesbury Parish BAP https://www.southglos.gov.uk//documents/Hawkesbury-BAP.pdf</p>

	<p>Westerleigh Parish BAP https://www.southglos.gov.uk//documents/Westerleigh-BAP.pdf</p>
12.5	<p>Further work by the community can then result in the delivery of a more detailed Local Nature Action Plan https://www.westerleighparishcouncil.org.uk/wp-content/uploads/2020/05/Westerleigh-and-Coalpit-Heath-LNAP-2022-25-Final.pdf <i>[coincidentally my home village and parish in my previous life].</i></p>
	<div style="display: flex; justify-content: space-around;"> <div data-bbox="284 555 858 1352"> </div> <div data-bbox="927 555 1501 1352"> </div> </div>
12.6	<p>I make the case that an abbreviated Parish BAP following the South Gloucestershire Council model can be produced very quickly and would not represent an onerous task. However, with the skillsets available in the local community, Lawshall Parish Council may wish to consider the development of a more comprehensive Parish BAP.</p>
12.7	<p>It is possible that the Suffolk Biodiversity Information Service (SBIS) and other partners may be able to offer seed funding for a Pilot Parish BAP initiative that other parishes across Babergh District and Suffolk may wish to follow. https://baberghmidsuffolk.moderngov.co.uk/documents/s20689/Appendix%20A%20-%20Biodiversity%20Action%20Plan.pdf</p>
	<p>Nationally, there are some other good examples of Local Biodiversity Action Plans and work that has been undertaken in supporting the preparation of Neighbourhood Development Plans. These can be viewed in the attached Appendix – Biodiversity References.</p>
	<p>Richard Livall 1st January 2023 <i>[Updated – 14th September 2023]</i></p>

Appendix - Biodiversity References

A: Parish Biodiversity Action Plan / Nature Conservation Strategy

Hawkesbury Parish Biodiversity Action Plan

<https://www.southglos.gov.uk//documents/Hawkesbury-BAP.pdf>

Westerleigh Parish Biodiversity Action Plan

<https://www.southglos.gov.uk//documents/Westerleigh-BAP.pdf>

Westerleigh and Coalpit Heath Local Nature Action Plan

<https://www.westerleighparishcouncil.org.uk/wp-content/uploads/2020/05/Westerleigh-and-Coalpit-Heath-LNAP-2022-25-Final.pdf>

Almeley Parish Biodiversity Plan

<https://almeleypc.org/wp-content/uploads/2018/07/Almeley-Parish-Council-Nature-Conservation-Plan-June-2018.pdf>

Hamble Parish Biodiversity Action Plan

<https://hambleparishcouncil.gov.uk/wp-content/uploads/2021/11/Biodiversity-Action-Plan.pdf>

Hornbeam Parish Biodiversity Action Plan

<http://www.horndeanbiodiversity.co.uk/files/Horndean%20Biodiversity%20Action%20Plan.pdf>

Hornbeam Biodiversity

<http://www.horndeanbiodiversity.co.uk/>

Overton Parish Biodiversity Action Plan

<https://www.overton-biodiversity.org/resources/docs/overton-bap-2015-19.pdf>

B: Neighbourhood Plans (with Wildlife Content)

Hellingly Neighbourhood Plan

<https://www.wealden.gov.uk/UploadedFiles/01-Hellingly-Neighbourhood-Plan.pdf>

Hellingly Topic Paper 8 - Wildlife Hubs and Natural Capital

https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_8_Biodiversity_Paper_1.pdf

Hellingly Topic Paper 8 - Desktop Biodiversity Report

https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_8_Biodiversity_Paper_2.pdf

Hellingly Topic Paper 8 - Nature Conservation and Biodiversity

https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_3_Biodiversity_Paper_3-1.pdf

Alcester Neighbourhood Plan

<https://www.stratford.gov.uk/planning-building/alcester-neighbourhood-plan.cfm>

Alcester Ecological Report

<https://www.alcester-tc.gov.uk/wp-content/uploads/2018/10/Alcester-Ecological-Report-Aug-2018.pdf>

Badgers Mount Neighbourhood Plan (under preparation)

https://www.badgersmountparishcouncil.org.uk/page-neighbourhood_plan.html

Badgers Mount Parish Council Ecological Appraisal

https://www.badgersmountparishcouncil.org.uk/imgs/final_habitat_report70.pdf

Barnham and Eastergate Neighbourhood Plan

<https://barnhamandeastergate-pc.gov.uk/the-parish-council/neighbourhood-plan-2019-to-2031/>

Barnham and Eastergate Neighbourhood Plan Appendix A Biodiversity Corridors

<https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n17417.pdf&ver=18059>

Brailsford Neighbourhood Plan

https://www.derbyshiredales.gov.uk/images/Brailsford_NP_Made_Version_July_2021.pdf

Brailsford Neighbourhood Plan - Local Landscape and Wildlife

But no supporting document

Brinkley Neighbourhood Plan

<https://brinklowvillage.co.uk/wp-content/uploads/2022/11/Draft-Brinklow-Neighbourhood-Plan-Made-Version-November-2022-18.11.22.pdf>

Brinkley Neighbourhood Plan Parish Biodiversity Audit

<https://brinklowvillage.co.uk/wp-content/uploads/2018/03/Binklow-Parish-Ecological-Report.pdf>

Hackleton Neighbourhood Plan

<https://www.southnorthants.gov.uk/info/47/neighbourhood-plans/284/hackleton-neighbourhood-plan>

Hackleton Parish Council Wildlife and Biodiversity Policy

<https://www.hackletonparishcouncil.gov.uk/uploads/wildlife-and-biodiversity-policy.pdf>

Hardwicke Neighbourhood Plan

<https://www.hardwickepc.gov.uk/documents/170706-185620-216-HardwickeNDPFinalDocumentJuly2017pdf.pdf>

Hardwicke Neighbourhood Plan Ecological Assessment

<https://www.stroud.gov.uk/media/241279/hardwicke-ndp-ecological-assessment.pdf>

Martock Neighbourhood Plan

<http://www.martockplan.org.uk/Drafts/Downloads/FinalVersion.pdf>

Martock Environmental Manual

<http://martockplan.org.uk/Documents/Supportingdocs/EnvManual.pdf>

Mylor Neighbourhood Plan

	<p>https://mylorflushingplan.uk/wp-content/uploads/2021/06/MYLOR-NDP-Main-document-Submission-Draft-MB-180521.pdf</p> <p>Mylor Neighbourhood Plan Parish Wildlife Assessment https://mylorflushingplan.uk/wp-content/uploads/2020/07/EB05-Wildlife-as-pdf.pdf</p> <p>Willaston Neighbourhood Plan https://www.cheshireeast.gov.uk/pdf/planning/neighbourhood-plan/willaston/willaston-neighbourhood-plan-18.05.18.pdf</p> <p>Willaston Neighbourhood Plan - Protecting and Enhancing Willaston's Natural Environment http://www.willaston-np.org.uk/files/Protecting_and_Enhancing_Willaston_Natural_Environment.pdf</p> <p>Worlingham Neighbourhood Plan https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Worlingham/Worlingham-Neighbourhood-Plan-Referendum-Version.pdf</p> <p>Worlingham Neighbourhood Plan - Biodiversity and Wildlife Corridors But no supporting document.</p>
C:	County Biodiversity Action Plan / Nature Conservation Strategy
	<p>Suffolk's Nature Strategy 2015 https://www.suffolk.gov.uk/asset-library/imported/suffolks-nature-strategy-2015.pdf</p> <p>Bucks Local Nature Recovery Strategy https://bucks.mknep.co.uk/nature-strategy/overview/ https://bucks.mknep.co.uk/biodiversity-net-gain/</p> <p>Northamptonshire Biodiversity Action Plan https://www.northamptonshire.gov.uk/councilservices/environment-and-planning/planning/planning-policy/archaeology-biodiversity-and-landscape/documents/PDF%20Documents/Northamptonshire%20BAP%202015-2020.pdf</p>
D:	District Biodiversity Action Plan / Nature Conservation Strategy
	<p>South Gloucestershire Biodiversity Action Plan https://www.southglos.gov.uk//documents/Biodiversity-Action-Plan-2016-26.pdf</p> <p>Babergh Biodiversity Action Plan https://babergmidssuffolk.moderngov.co.uk/documents/s20689/Appendix%20A%20-%20Biodiversity%20Action%20Plan.pdf</p>
E:	County & District Biodiversity Guides
	<p>Suffolk County Council Neighbourhood Planning Guidance https://www.suffolk.gov.uk/asset-library/imported/Neighbourhood-A4booklet.v4.pdf</p>

	<p>Green Suffolk - Green light for council's biodiversity vision https://www.greensuffolk.org/news/green-light-for-councils-biodiversity-vision/ https://www.greensuffolk.org/green-communities/</p> <p>Suffolk Biodiversity Validation Requirements 2015 https://www.midsuffolk.gov.uk/assets/DM-Planning-Uploads/Validation-and-additional-guidance/Suffolk-Biodiversity-Validation-Requirements.pdf</p> <p>Babergh pledges to protect wildlife https://www.babergh.gov.uk/environment/climate-change/babergh-pledges-to-protect-wildlife/</p> <p>South Gloucestershire Local Biodiversity https://www.southglos.gov.uk/environment-and-planning/countryside/wildlife/what-is-biodiversity/</p> <p>South Gloucestershire Local Nature Action Plans Guidance https://beta.southglos.gov.uk/wp-content/uploads/Local-Nature-Action-Plans-guidance-for-town-and-parish-councils.pdf</p> <p>Berks, Bucks & Oxfordshire Biodiversity https://www.bbowt.org.uk/sites/default/files/2019-10/How%20to%20develop%20a%20Neighbourhood%20Plan.pdf</p> <p>Leicestershire County Council - What a Parish Council can do for biodiversity https://resources.leicestershire.gov.uk/sites/resource/files/field/pdf/2020/6/29/FS3-What-a-parish-council-can-do-for-biodiversity.pdf</p> <p>Warwickshire Wildlife Trust - Biodiversity Action Plans promotion https://www.warwickshirewildlifetrust.org.uk/sites/default/files/2018-03/PARISH%20BIODIVERSITY%20ACTION%20PLAN%202014.pdf</p> <p>Sussex Wildlife Trust - Mapping Biodiversity in your local area https://sussexwildlifetrust.org.uk/discover/planning/strategic-planning/neighbourhood-plans/how-to-include-wildlife-in-neighbourhood-plans/mapping-biodiversity-in-your-local-area</p> <p>Craven Green Infrastructure and Biodiversity SPD https://www.cravenc.gov.uk/planning/spatial-planning/spds-and-information/green-infrastructure-and-biodiversity/green-infrastructure-and-biodiversity-spd/</p>
F:	Wildlife Trusts & County Biodiversity Information Services
	<p>Suffolk Wildlife Trust https://www.suffolkwildlifetrust.org/</p> <p>Suffolk Biodiversity Information Service https://www.suffolkbis.org.uk/</p> <p>Suffolk Ecological Networks Project https://www.suffolkbis.org.uk/sites/default/files/2022-05/Ecological%20Networks%20Methodology%202007_0.pdf</p>

	<p>Norfolk Biodiversity Partnership https://www.norfolkbiodiversity.org/habitats-and-species/</p> <p>Devon DBRC Resource Map https://www.dbrc.org.uk/neighbourhood-plans/</p>
G:	Biodiversity Good Practice / Toolkits
	<p>South Somerset Community Biodiversity Toolkit https://www.southsomersetenvironment.co.uk/biodiversitytoolkit https://ashpcsomerset.com/community-biodiversity-toolkit/</p> <p>Basingstoke Parish Wildlife Map Toolkit https://www.basingstoke.gov.uk/content/page/57854/Parish%20Wildlife%20Map%20Toolkit.pdf</p>
H:	Biodiversity Mapping Sources
	<p>ArcGIS Online https://www.arcgis.com/home/index.html https://livingatlas.arcgis.com/en/browse/#d=1&rqnCode=GB</p> <p>Living England Habitat Map (Phase 4) https://www.arcgis.com/apps/mapviewer/index.html?layers=b3069e7cb3084732b92478b3db51b9c6 + many more.</p> <p>MAGIC Map Application https://magic.defra.gov.uk/magicmap.aspx</p> <p>National Habitat Network Maps https://magic.defra.gov.uk/Metadata_for_magic/Habitat%20Network%20Mapping%20Guidance.pdf + many more.</p> <p>Natural England Geo-data Portal https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::priority-habitat-inventory-south-england/explore?location=52.143954%2C0.717461%2C12.94</p>
I:	Biodiversity Net Gain
	<p>Bath Biodiversity Net Gain https://beta.bathnes.gov.uk/biodiversity-net-gain</p> <p>Eastbourne Biodiversity Net Gain https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/314723.pdf</p>
J:	Parish Biodiversity Reports / Appraisals / Surveys

	<p>Risby Wildlife Friendly Village https://www.wildlifefriendlyvillage.co.uk/</p> <p>West Bletchley and Biodiversity and Habitat Survey https://www.westbletchleycouncil.gov.uk/local-news/west-bletchley-biodiversity-habitat-survey</p>
K:	National Documents
	<p>National Planning Policy Framework 2021 (pages 50-54) 15. Conserving and enhancing the natural environment https://www.gov.uk/government/publications/national-planning-policy-framework--2</p> <p>The Natural Environment White Paper 'The Natural Choice' (2011) https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature</p> <p>Biodiversity 2020 'Strategy for England's Wildlife and Ecosystem Services' (2011) https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services</p> <p>Nature Recovery Network https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network</p>

(11) Resident - Squirrell

By e-mail

Rec'd: 2 August 2023

Subject: Lawshall Neighbourhood Plan

Good Evening

I would like to for my Original comments on the Hamlet of Harts Green not being included in the Neighbourhood plan to be considered for review.

As residents of Donkey Lane [REDACTED], we strongly feel that the [area known] as Harts Green, and which is shown on maps and marked as Harts Green, should be recognised and included as a Hamlet.

Searches of the Internet and Wikipedia state "Harts Green" as a Hamlet of Lawshall. But the Local Parish Council seem adamant that it is not.

The Area had an Old Public House, called Carpenters Arms, and there would have been more dwellings in past times. Most notable would be Harts Green Farm, that would have offered employment to villagers in times gone by.

For these reasons, I strongly feel that Harts Green should be recognised as a Hamlet of the Village, and therefore be identified as such within the Neighbourhood Plan.

I would welcome further discussion on this, and am available to discuss.

Kind Regards

Mr Squirrell

BDC note: In addition to the above e-mail, the following response was also made on behalf of a member of the family ...

Section Two: Your comment(s)

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

Paragraph No.	5.5 (Page 16)	Policy No.	5 Planning Strategy
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

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

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

Please be as brief and concise as possible ...

Further to email sent on 2/8

Harts Green is shown on map as a Green and is listed as a Hamlet of the village if you search on internet, so we feel the Parish council have not considered correctly the comments that were made during the consultation.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ...

To include the Area of Harts Green as would have been part of the settlement boundary and is a Hamlet of Lawshall

(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 ...

A hearing would allow an open discussion.
Allowing evidence to show Harts Green is considered
A Hamlet of the village

~~for~~

(Continue on separate sheet if necessary)

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 Lawshall NP Review by Babergh District Council	<input checked="" type="checkbox"/>

Signed: 	Dated: 2/8/23
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