

Babergh District Council



Sproughton Neighbourhood Plan 2018 - 2037

Reg 16 Submission consultation responses

On 4 November 2022, Sproughton Parish Council (the 'qualifying body') submitted their Neighbourhood Development Plan to Babergh District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Monday 12 December 2022 until Friday 3 February 2023.

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

Ref No.	Consultee
(1)	Cllr Zac Norman (Babergh District Council)
(2)	Suffolk County Council
(3)	Babergh District Council
(4)	Natural England
(5)	Historic England
(6)	Anglian Water
(7)	East Suffolk Internal Drainage Board
(8)	Marine Management Organisation
(9)	Defence Infrastructure Organisation, obo the MOD
(10)	Mr Livall
(11)	Boyer Planning (obo Taylor Wimpey UK Limited)
(12)	Pigeon Investment Management

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(1) CLLR NORMAN

E from: District Councillor Zac Norman

Rec'd: 9 December 2022

Subject: Re: Consultation on R16 Sproughton NP (Babergh DC)

Dear Paul,

Following the notification of consultation with regards to Sproughton's Neighbourhood Plan, I would like to greatly endorse this plan and it is with huge gratitude that the Neighbourhood Planning Committee in Sproughton has worked so hard to get all of this sorted for the community. This plan gives the community a future and a voice which is something they have been lacking in recent years.

This plan will give Sproughton much needed protection over the spaces that are important and therefore it is an honour to support this plan and I hope that all residents of Sproughton feel the same.

Kind Regards

Cllr Zac Norman
Ward Member for Sproughton & Pinewood
Babergh District Council

[Ends]

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(2) SUFFOLK COUNTY COUNCIL

Date: 02 February 23
Enquiries to: Georgia Teague
Tel: 01473 265054
Email: georgia.teague@suffolk.gov.uk
neighbourhoodplanning@suffolk.gov.uk



Spatial Planning Policy Team,
Babergh & Mid Suffolk District Councils,
Endeavour House,
8 Russell Rd,
Ipswich, Suffolk,
IP1 2BX

Dear Mr Bryant,

Submission Consultation version of the Sproughton Neighbourhood Plan

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

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

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

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

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

Policy SPTN16 and on-street parking provisions

As part of the Reg14 Consultation, SCC recommended the inclusion of on-street parking into Policy SPTN16 Development Design Considerations.

Within the Consultation Statement, the neighbourhood planning group disagree with the County Council's suggestion that development should provide a level of on street parking, stating: "On-street parking has a significant detrimental impact on the character of the area as well as the ability to service a development and highway safety."

It is believed that the parish council have misunderstood the intent of SCC's recommendation to include on-street parking. It was not intended that this parking would be on the existing highway, but within the site of any new developments. Any new on-street parking should of course be provided on the site of a development, rather than the existing highway.

A level of on-street parking will always be inevitable – from family and friends visiting residents of a development, tradespeople, and delivery and maintenance vehicles temporarily attending to properties. Inconsiderate parking on-street and on pavements can cause a danger to pedestrians, cyclists, and other road users, who are unable to have a clear view or access.

However, having well designed and integrated on street parking can help to reduce inconsiderate parking, which can restrict access for emergency services and refuse collections, and parking on pavements that hinder pedestrian access and safety. Please see pages 25-28 of Suffolk Guidance for Parking 2019¹ for further guidance.

The mentions of walking and cycling and permeability is welcomed, however, it is recommended that Policy SPTN16 could be further enhanced by including that movements of pedestrians and cyclists should be prioritised where feasible within developments and should connect to existing footways.

This is stated in paragraph 112 of the NPPF: "applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;" and part c) which states: "create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles".

The recently adopted SCC document Suffolk Design Streets Guide² indicates on page 43 that "Parked vehicles become a nuisance for other users when parked on pavements and a maintenance burden for the highway authority."

SCC suggests that well-designed and well-integrated on-street parking provisions could help reduce the level of inconsiderate and dangerous pavement parking.

Paragraphs 2.14 and 2.16 of the Neighbourhood Plan shows that parking and pedestrian safety are concerns in the community. This indicates that inconsiderate on-street parking is already an issue

¹ <https://www.suffolk.gov.uk/asset-library/imported/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf>

² <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas>

for Sproughton, and SCC suggests that our proposed amendments to the Neighbourhood Plan could help to tackle this issue.

Objective 14 of the Neighbourhood Plan states, “To promote measures to improve the safety of the roads and footways through the parish”, having provisions for well-designed on-street parking within new developments can help to achieve this goal, as having specific on-street parking provisions could help reduce the unsafe parking on pavement and verges.

As such, it is recommended that part g) of Policy SPTN16 is amended to state:

“g. produce designs, in accordance with standards, that maintain or enhance the safety of the highway network ensuring that road layouts do not dominate the area, that *all-appropriate* vehicle parking is provided within the *development plot where a proportion of parking is provided on street within a new development, but is well designed, located and integrated into the scheme to avoid obstruction to all highway users or impede visibility*, and seek always to ensure permeability through new housing areas, connecting any new development into the heart of the existing settlement *whilst prioritising the movement of pedestrians and cyclists;*”

SCC believes that the proposed amendments to Policy SPTN16 will help the Sproughton Neighbourhood Plan to meet Basic Condition a), to be in accordance with the NPPF.

Policies Map

Whilst not strictly a matter for the Basic Conditions, SCC notes that the Parish Wide Policies Map (page 62) and the Wolsey Grange Inset Policy Map (page 65) both display a grey-shaded area, which does not appear to be defined on any of the Policy Map Keys. This could lead to confusion or ambiguity.

SCC seeks clarification as to what this area is displaying, and requests the Keys are updated to include this. This will provide clarity and context to the reader.

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

Yours sincerely,

Georgia Teague
Planning Officer
Growth, Highways, and Infrastructure

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(3) BABERGH DISTRICT COUNCIL

Our ref: Sproughton NP R16 Response
Dated: 3 February 2023

From: Planning Policy Team, BMSDC
To: Ann Skippers (Sproughton NP Examiner)
cc: Sproughton Parish Council

Dear Ann,

- 1. Sproughton Neighbourhood Plan 2018 - 2037**
- 2. Reg 16 Submission Consultation – Comments from Babergh District Council**

This response is made for and on behalf of Robert Hobbs (Corporate Manager for Strategic Planning at Babergh & Mid Suffolk District Councils).

Babergh District Council welcomes the changes that have been made to the Sproughton Neighbourhood Plan (the 'Plan') in response to our previous consultation response. We also note the other changes that have been made as a direct response to the decision to split our emerging Joint Local Plan (the 'JLP') into a Part 1 and Part 2 document. Further updates will be required to ensure that the text remains relevant, e.g., the flowchart on page 7 and any cross-references to emerging JLP policies (e.g., para 6.15, and para's 7.4 - 7.5). With your permission, the latter could be dealt with on a case-by-case basis with wording agreed between District and Parish Council.

We do have some further comments to make and set these out on the following pages.

For your information, an outline application for the *'erection of up to 750no. dwellings, up to 3ha of primary education land, public open space, SuDS (Sustainable Drainage Systems), landscaping and highway improvements on Land North of the A1071, [Sproughton], Ipswich'* received a resolution to grant planning permission subject to a Section 106 Agreement on 25 January 2023. The application reference number is DC/21/02671/OUT and a link to the Planning Committee information is contained below.

[Babergh Planning Committee - 25 January, 2023](#)

We trust that our comments are helpful.

Yours sincerely

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



Babergh and Mid Suffolk District Councils
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www.babergh.gov.uk / www.midsuffolk.gov.uk

Reg 16 Submission draft Sproughton Neighbourhood Plan 2018 - 2037

Comments from Babergh District Council

Para 6.18

The second sentence refers to allocated sites. This is still presumably a reference to the site allocations that were set out in the JLP (Nov 2020). Subject to the Parish Council confirming this, and to avoid misunderstanding - the Sproughton NP does not allocate housing sites - we recommend that para 6.18 be amended to read:

'The [AECOM](#) Assessment estimated that 84 affordable homes will be required [over the Plan period](#) to meet the needs of local residents. The ~~allocated sites extant planning permissions will deliver well~~ [are expected to deliver](#) in excess of [this the current](#) requirements, but it is necessary to ensure that [...] these developments.'

[NB: Inclusion of the specific reference to the 'AECOM Assessment' is made to pre-empt any link being made between their estimation of need and the 84 dwellings referred to in para 3.8, which will be of all tenure types.]

Chapter 8

i) Map 3 and Map 4

Two new maps (Maps 3 & 4) have been inserted into the Plan at page 32. Both come from Landscape Appraisal¹ but neither appear to be referred to in supporting text. They are clearly not the "Historic Landscape Characterisation" (Figure 2) map mentioned in para 8.4, which leads us to think that the wrong image may have been inserted. Perhaps the Parish Council could clarify this?

Following on from the above, towards the end of para 8.9, there is a cross reference to Map 3. Subject to other changes that may be needed, we think this should read Map [5](#).

ii) Policy SPTN 9 – Important Views

Policy SPTN 9 includes a cross reference to Map 5. At present, the Important Views are shown on Map 7 (page 37), but this could change if corrections are also made because of our comments above re Maps 3 & 4.

iii) Policy SPTN10 - Local Green Spaces

We note that the number of designated Local Green Spaces has increased to fifteen, the notable additions being All Saints Church Cemetery/Church Yard (#10), Chantry Cut Island (#13), Grove Wood (#14), and Oak Pit (#15). From the information provided, we have no objection in principle to their inclusion.

¹ <https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Sproughton-NP-Landscape-Appraisal-Feb21.pdf>

In response to both our and other consultee comments, we also note the sensible decision to delete the previous 'Green triangle at the junction of Hadleigh Rd' allocation.

Miscellaneous observations

Para 10.6: There is a typo at the start of the 7th bullet point, which should read 'enhance ...'

SPTN 20: For common sense reasons, we suggest the last paragraph be amended to read:

"Where possible, new power and telephone cables/~~masts~~ should be placed underground. Alternatively, if this is not possible, ~~they~~ masts must be camouflaged to blend in with their environment."

Policies Map:

- The 'Special Character Area (SPTN15)' text is missing from the key on page 62
- The area shaded grey in the Policies Map and Wolsey Grange Inset Map is still presumably the Wolsey Grange 1 development area. It is not shown in the key which would be helpful.

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(3) NATURAL ENGLAND

Date: 09 January 2023
Our ref: 416398
Your ref: Sproughton Neighbourhood Plan



Babergh District Council
communityplanning@baberghmidsuffolk.gov.uk

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

BY EMAIL ONLY

T 0300 060 3900

Dear Sir or Madam

The Sproughton Neighbourhood Plan 2018 – 2037

Thank you for your consultation on the above dated 09 December 2022

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

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

Natural England does not have any specific comments on this Neighbourhood Plan Publication draft

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

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

Yours faithfully

Corben Hastings
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

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

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

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

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

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

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

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

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

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

(5) HISTORIC ENGLAND



Mr Paul Bryant
Babergh & Mid Suffolk District Councils
Endeavor House
8 Russell Road
Ipswich
Suffolk
IP7 6SJ

Direct Dial: [REDACTED]

Our ref: PL00705744

3 February 2023

Dear Mr Bryant

Ref: Sproughton Neighbourhood Plan Regulation 16 Consultation

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

Having reviewed the plan and relevant documentation we consider that it meets the Basic Conditions with regard to the historic environment. We are especially pleased to note the proactive approach to the conservation of Sproughton's heritage set out in Chapter 9. We support the plan in identifying local Areas of Distinctive Character, and note the interest in formally designating the Sproughton Special Character Area as a Conservation Area. We are happy to advise on this point in due course.

We would recommend a change to paragraph 9.3 as follows:

As well as those buildings on the statutory list, there are over 35 buildings in the parish that make a positive contribution to the character of the area and sense of place because of their heritage value. Although such heritage assets may not be nationally designated or even located within the boundaries of the potential conservation area, they may be offered some level of protection through identifying them as a 'local heritage asset'. A separate assessment has been completed to identify whether there are any non-listed buildings that would potentially meet Historic England's criteria for designation as a local heritage asset, and where identified these will be protected by the provisions of Policy SPTN 14. ~~Where such buildings do exist, it would be for Babergh District Council to designate them as Local Heritage Assets.~~

This change is because it is within the prerogative of Sproughton Neighbourhood Plan to designate its own Local Heritage Assets as set out in Paragraph: 040 Reference ID: 18a-040-20190723 of the PPG and which, upon the Making of the neighbourhood plan, would be encompassed by the provisions relevant national, local and neighbourhood policy.

We would be grateful if you would notify us on



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

eastplanningpolicy@historicengland.org.uk

[<mailto:eastplanningpolicy@historicengland.org.uk>](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council.

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

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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

(5) ANGLIA WATER

E from: Tessa Saunders | Spatial Planning Advisor
Rec'd: 27 January 2023
Subject: Consultation on R16 Wherstead NP

Dear Paul,

Please find attached our response to the Sroughton Neighbourhood Plan. I would be grateful if you could acknowledge receipt of this email.

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]

Anglian Water Consultation Response

Sroughton Neighbourhood Plan Reg. 16 Consultation

1. Anglian Water

- 1.1. Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.
- 1.2. Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, above and beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

2. Anglian Water and Neighbourhood Development Plans

- 2.1. Anglian Water is the statutory water and sewerage undertaker for the Sroughton neighbourhood plan area and is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources.

3. Commentary on the Sproughton Neighbourhood Plan

- 3.1. Anglian Water welcomes the opportunity to comment on the Sproughton Neighbourhood Plan submission. The following comments are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water.

POLICY SPTN 7 - AREA OF LOCAL LANDSCAPE SENSITIVITY

- 3.2. We note that the area identified as Valued Landscape omits the Sproughton Church Lane Water Recycling Centre (WRC). We consider that this is appropriate and ensures that if future investment and upgrades are required at the WRC, this should not be unduly affected by this policy. Whilst some works at our sites fall within the scope of permitted development (as defined in Schedule 2 of the General Permitted Development Order 2015), there are circumstances where the investments needed to upgrade and enhance essential infrastructure do require planning permission.

POLICY SPTN 10 - LOCAL GREEN SPACES

- 3.3. We note the Local Green Spaces proposed in the Plan and consider that the national policy approach towards Green Belts will enable us to undertake any operational works to our assets that intersect with these spaces, including mains water supply and sewers.

POLICY SPTN 11 - BIODIVERSITY PROTECTION AND ENHANCEMENT

- 3.4. We support the policy approach to ensure there is no net loss in biodiversity within the neighbourhood plan area and enhancement is sought through 10% biodiversity net gain. Anglian Water has made a corporate commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats on all Anglian Water owned land, which aligns with our purpose to bring environmental and social prosperity to the region we serve.

POLICY SPTN 16 - DEVELOPMENT DESIGN CONSIDERATIONS

- 3.5. We welcome the policy to ensure new development in the neighbourhood plan area is of high- quality design. We particularly support the policy aims to protect and enhance biodiversity and green infrastructure and encouraging the use of sustainable drainage systems, including rainwater and storm water harvesting, to minimise surface water run-off. This ensures the drainage hierarchy is followed to manage surface water run-off on site and avoid seeking surface water sewer connections.
- 3.6. Given the work undertaken to produce the design guidance and codes for the neighbourhood plan area, we suggest that this is directly referenced in the policy to ensure it has the appropriate weight in decision making as not all aspects of the design codes are included in the design checklist (Appendix 3).
- 3.7. In addition, the design guidance and codes specifically include DC.12 Sustainable Design, therefore we would welcome reference to encouraging sustainable design

within the policy particularly in terms of encouraging the highest standards of energy and water efficiency, which help to ensure that new homes are cheaper to run and use less resources. This is particularly important as this is a region identified as being seriously water stressed.

POLICY SPTN 17 - FLOODING AND SUSTAINABLE DRAINAGE

- 3.8. We support the approach to managing surface water flood risk in through the measures outlined in this policy particularly utilising SuDS as a nature-based solution that provides multi- functional benefits.
- 3.9. We would welcome reference to the design code DC.12.3 Sustainable Drainage Systems (SuDS) within the policy and/or the supporting text to provide further detail on the design and use of SuDS to minimise the risk of surface water flooding and encouraging reuse of rainwater to reduce demand for potable water supplies.
- 3.10. We consider that this policy together with national and local policies and guidance will provide a robust approach to managing surface water flood risk until the Government implements the provisions of Schedule 3 of the Flood and Water Management Act 2010, to make SuDS mandatory in all new developments in England (expected in 2024). Provisions in Schedule 3 of the Act also provide:
- a framework for the approval and adoption of SuDS;
 - the creation of a SuDS approving body (SAB);
 - national standards on the design, construction, operation, and maintenance of SuDS; and
 - makes the right to connect surface water runoff to public sewers conditional upon the drainage system being approved before any construction work can start.

4. Conclusion

- 4.1. Anglian Water is generally supportive of the Sproughton Neighbourhood Plan and considers that this will enable sustainable development to be achieved within the neighbourhood plan area and provide the appropriate framework to guide future growth (to be planned in future/emerging Local Plans). Given the emphasis on creating beautiful places in the National Planning Policy Framework, we would welcome greater emphasis on the Sproughton Design Guidance and Codes within the neighbourhood plan as indicated in our response.

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(7) EAST SUFFOLK DRAINAGE BOARD



East Suffolk Internal Drainage Board
Pierpoint House
28 Horsley's Fields
KING'S LYNN
Norfolk PE30 5DD

01553 819600
planning@wlma.org.uk

Our Ref: 22_07619_P

01/02/2023

Dear Sir/Madam

RE: Sproughton Parish Neighbourhood Plan

Sproughton parish falls partially within the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. It also falls within the Board's watershed catchment (meaning water from the site will eventually enter the IDD). A copy of the Board's Byelaws can be accessed on our website (https://www.wlma.org.uk/uploads/ESIDB_Byelaws.pdf), along with maps of the IDD (https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf). Mapping indicating the watershed catchments of each Board are also available on our website: (https://www.wlma.org.uk/uploads/ESIDB_Watershed.pdf).

The principal function of the IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD receive maintenance by the Board. The maintenance of a watercourse by the IDB is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD. The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites. For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance [SuDS discharge location hierarchy](#).

Main Rivers within the IDB are regulated by the Environment Agency. Therefore, I recommend that an applicant proposing a discharge or any other works affecting a main river to contact the Environment Agency.

In order to avoid conflict between the planning process and the Board's regulatory regimes and consenting processes where developments are proposed within or partially within a Board's IDD, please be aware of the following:

- If a development proposes to dispose of surface water via infiltration, we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency. If (following testing) a strategy wholly reliant on infiltration is not viable and a surface water discharge is proposed to a watercourse, the proposed development will require consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water

Jane Marson (Chairman) Michael Paul (Vice-Chairman)

Phil Camamile (Chief Executive)

Constituted by The East Suffolk Internal Drainage Board Order 2008
Statutory Instrument 2008 No 750



Development Contribution fee, calculated in line with the Board's charging policy (available at https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).

- If a development proposes to discharge surface water to a watercourse, the proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy. (available at https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf).
- If a development proposes to discharge surface water to a sewer, I recommend that you satisfy yourselves that this proposal is in line with the drainage hierarchy (as per best practice) and is viable in this location.
- If a development proposes to discharge treated foul water to a watercourse, this proposal will require land drainage consent in line with the Board's byelaws (specifically byelaw 3).
- Should any development include works within 9 metres of a Board maintained watercourse, consent would be required to relax Byelaw 10 (no obstructions within 9 metres of the edge of drainage or flood risk management infrastructure).
- Should any development include works to alter a Board maintained watercourse consent will be required under the Land Drainage Act 1991 (and byelaw 4).
- Should and works be proposed to alter a riparian watercourse, consent would be required under Section 23 of the Land Drainage Act 1991 (and byelaw 4).

As outlined above, works to watercourses (such as surface water discharges and/or any alterations of said watercourses) will require consent from the relevant regulatory body. Therefore, we would recommend that Policy SPTN 17 - Flooding and Sustainable Drainage within the Neighbourhood Plan includes reference to the relevant regulators (such as the East Suffolk Internal Drainage Board, the Environment Agency and the Lead Local Flood Authority).

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application.

For developments outside a Board's IDD but within its watershed catchment, where surface water discharges have the potential to indirectly affect the Board's IDD, we would offer the following advice:

- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced. As such we would recommend that the proposed strategy is supported by ground investigation to determine the infiltration potential of the site and the depth to groundwater. If on-site material were to be considered favourable then we would advise infiltration testing in line with BRE Digest 365 (or equivalent) to be undertaken to determine its efficiency.
- If it is proposed to discharge surface water to a watercourse within the watershed catchment of the Board's IDD, we request that this discharge is facilitated in line with the [Non-Statutory technical standards for sustainable drainage systems](#) (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.

The reason for our recommendation is to promote sustainable development within the Board's Watershed Catchment therefore ensuring that flood risk is not increased within the Internal Drainage District (required as per paragraph 163 of the [National Planning Policy Framework](#)). For further information regarding the Board's involvement in the planning process please see our [Planning and Byelaw Strategy](#), available online.

Kind Regards,

Ellen.

Ellen Moore
Sustainable Development Officer
Water Management Alliance

How to Apply for Land Drainage Consent

To apply for Land Drainage Consent please complete an application form.

Application forms, application fees and 'Frequently Asked Questions' can be found on the 'Development' section of the Board's website, here:

<https://www.wlma.org.uk/east-suffolk-idb/development/>

For any additional help please call us on 01553 819600 or email planning@wlma.org.uk.

Byelaws

East Suffolk IDB Byelaws can be found via the following link:

https://www.wlma.org.uk/uploads/ESIDB_Byelaws.pdf

Mapping

Mapping of the district can be viewed via the following link:

https://www.wlma.org.uk/uploads/ESIDB_Index_plan.pdf

Planning and Byelaw Strategy

The Board's Planning and Byelaw Strategy seeks to provide:

- Guidance on how (and why) the Board will review and comment on planning applications.
- Information on the policies against which the Board will assess and determine applications.
- Guidance to riparian (waterside) landowners regarding watercourse maintenance.

The Planning and Byelaw Strategy can be found via the following link:

https://www.wlma.org.uk/uploads/WMA_Planning_and_Byelaw_Policy.pdf

Arterial Watercourses

Maps on the Board's website show which watercourses are designated as Arterial Watercourses by the Board. You may also have heard these watercourses referred to as 'Main Drains' or 'Maintained Watercourses'. The designation is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB using the Board's Permissive Powers. Although the Board opts to proactively maintain this arterial network, there is no change in the ownership or liability associated with the watercourse resulting from this designation.

Why we have commented on this application:

By engaging with the planning process the Board is seeking to:

- Reduce flood risk to communities within the Internal Drainage District
- Promote sustainable development in sustainable locations by supporting sound planning decisions in accordance with the National Planning Policy Framework (especially [Paragraph 167](#)) and the [Non-standard technical standards for SuDS](#).
- Reduce the potential for conflict between the planning process and the Board's regulatory process.

For further information please refer to the Board's Planning and Byelaw Strategy.

(8) MARINE MANAGEMENT ORGANISATION

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

Rec'd: 20 January 2023

Subject: Sproughton NP Reg 16 Consultation

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

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

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

To receive marine planning updates and our newsletter enter your details [here](#).

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

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(9) DEFENCE INFRASTRUCTURE ORGANISATION, obo the MOD



Defence
Infrastructure
Organisation

Christopher Waldron

Ministry of Defence

Safeguarding Department

DIO Head Office

St George's House

DMS Whittington

Lichfield

Staffordshire WS14 9PY

Your reference: The Sroughton Neighbourhood
Plan 2018 – 2037 Reg 16 consultation

Our reference: 10057162

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Statutory@mod.gov.uk](mailto:DIO-Safeguarding-Statutory(MULTIUSER)@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

3RD February 2023

Dear Paul

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

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

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

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

The MOD have an interest within the area covered by the Sproughton Neighbourhood Plan 2018 – 2037 as it contains areas that are washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites. Wattisham Station is located to the North-West 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.

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

Additionally, the MOD have an interest within the area covered by the Sproughton Neighbourhood Plan 2018 – 2037 in a new technical asset known as the East 2 WAM Network, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Sproughton Neighbourhood Plan area of interest.

The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern.

The MOD should be consulted within the Sproughton Neighbourhood Plan 2018 – 2037 of any potential development within the statutory technical safeguarding zones that surround the East 2 WAM network and/or Wattisham Station which consists of structures or buildings exceeding statutory safeguarding technical criteria, or any development in the statutory birdstrike safeguarding zone that surround Wattisham Station which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

I trust this clearly explains our position on this update. 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) MR LIVALL

E from: Mr Livall

Rec'd: 2 February 2023

Subject: Sproughton Neighbourhood Plan 2018-2037 Submission Plan Representations

Attach: Sproughton Biodiversity Statement

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

Dear Mr Bryant

I have recently had the pleasure of viewing the Sproughton Neighbourhood Plan 2018-2037 Submission Plan and can see that some positive steps are being taken by the community in policy terms to protect and enhance biodiversity in the parish of Sproughton.

I make a number of objections to the Reg 16 Submission Plan, all of which relate to biodiversity.

Objection 1

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

Footnote: I provide a comprehensive supporting report entitled "Sproughton Biodiversity Statement". In particular I refer to paras. 1.1, 1.4, 3.1, 3.2, 3.3, 3.4, 12.1, 12.2 and 12.6 of the statement.

Objection 2

The Submission Plan is not addressing the challenge of climate change and its implications for biodiversity and therefore the Plan does not accord with the National Planning Policy Framework [namely Paras 8, 11, 98, 131 and Section 14 "Meeting the challenge of climate change, flooding and coastal change"].

Footnote: A key theme emerging currently in Neighbourhood Plans is "climate change" and the "climate emergency". The only reference to "climate change" in the Submission Plan is a single mention in Para 8.14 relating to Green Infrastructure.

Objection 3

Policy SPTN 11 "Biodiversity Protection and Enhancement" has been written without the support of up-to-date biodiversity information, wildlife corridor network maps and data on priority species etc. Given this serious deficiency, it is questioned whether it is possible for the policy to accord with the relevant sections of the National Planning Policy Framework [namely Paras 8, 28, 31, 174, 175 and 179]. Para. 31 of the NPPF states that "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence."

Footnote: I provide a comprehensive supporting report entitled "Sproughton Biodiversity Statement". In particular, I refer to paras. 1.2 and 1.3 of the statement. The Parish Council may decide that Policy SPTN 11 should be strengthened further following the completion of a Parish Biodiversity Action Plan / Ecological Assessment.

Cont./

Objection 4

I object to the removal of "Landbridge, River's Court, High Street" from the Sproughton Neighbourhood Plan 2018-2037 Submission Plan Local Green Space Assessment (August 2022) at the request of Landbridge.

Footnote: I am deeply concerned that small communities preparing Neighbourhood Plans may be pressured to make changes to their emerging NDP by influential landowners. In terms of transparency and openness of the Plan process I make a formal request that "Landbridge, River's Court, High Street" is included within the LGS Assessment. I believe that the site may be of importance in terms of habitat and biodiversity. Any planning reasons for the exclusion of the site should form part of the Assessment. If there are no sound planning reasons for its exclusion the Independent Examiner may wish to consider whether the Landbridge site should be recommended for LGS designation.

I would be grateful if you will kindly acknowledge receipt of my representations.

I will forward this communication to other interested parties as I consider that the issues that I have raised may have much wider implications.

Kind regards

Mr Livall

Sproughton Biodiversity Statement

1. Introduction

1.1 I have recently had the pleasure of viewing the Sproughton Neighbourhood Plan 2018-2037 Submission Plan and can see that some positive steps are being taken by the community in policy terms to protect and enhance biodiversity in the parish of Sproughton.

In particular, I note key **Natural Environment Objective 7: To protect open green spaces, woodland, countryside, mature trees and ancient hedgerows to enhance biodiversity, through net gains in wildlife habitat and wildlife corridors.**

There are 6 policies which sit under this objective, 3 of which are of particular significance to biodiversity:

- Policy SPTN 10 - Local Green Spaces
- Policy SPTN 11 - Biodiversity Protection and Enhancement
- Policy SPTN 12 - Recreational Disturbance Avoidance and Mitigation

I also note the inclusion of:

Map 8 – Green Infrastructure Network

Figure 3 – Natural Heritage Trees and Woodland

Local Green Space – delineated on Parish Wide Policies Map & Inset Plans

However, there is a key weakness, as a meaningful Parish Biodiversity Action Plan / Ecological Assessment does not appear to have been undertaken which would provide an up-to-date "assessment of existing and potential components of ecological networks, biodiversity resources and landscapes" [source <https://www.gov.uk/guidance/plan-making>] and is vital to meet key requirements of the NPPF, namely Paras 8, 28, 31, 174, 175 and 179

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

1.2 I refer to Policy SPTN 11 which includes:

“development proposals should avoid the loss of, or material harm to, trees, hedgerows and other natural features such as ponds.”

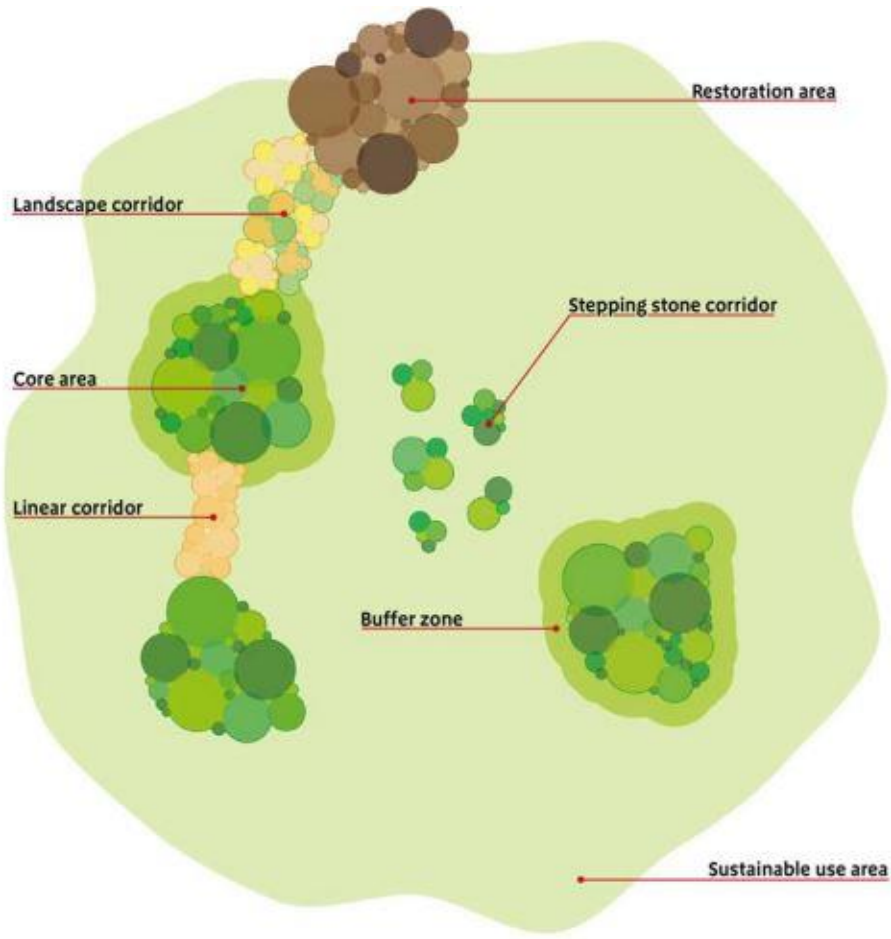
“the creation of new natural habitats including ponds.”

“the planting of additional trees and hedgerows (reflecting the character of Sproughton’s traditional hedgerows).”

“restoring and repairing fragmented biodiversity networks through, for example, including holes in fences which allow access for hedgehogs.”

1.3	<p>I do not propose to re-write Policy SPTN 11, but I do feel that the policy can be strengthened further with reference to the following good practice:</p> <p><i>“development proposals will be expected to protect and enhance existing ecological networks, wildlife corridors and priority species. Proposals should retain existing habitats of biodiversity value within the parish such as ponds, hedgerows, trees (including veteran trees), traditional orchards, woodlands, wood pasture and parkland and any other semi natural habitats within the parish.”</i></p> <p><i>“seek initially to retain existing features and avoid loss or damage of biodiversity.”</i></p> <p><i>“retaining habitats of value (including existing hedgerows, ponds, trees and any wildlife corridors and habitats) for enhancement and management and retaining species in situ.”</i></p> <p><i>“replacement of lost protected and priority habitats and accommodating displaced species in the site boundary.”</i></p> <p><i>“creation, restoration and enhancement of new natural habitats including ponds.”</i></p> <p><i>“creating new wildlife corridors which link up with existing ones.”</i></p> <p><i>“restoration existing habitats or creation of new natural habitats.”</i></p> <p><i>“restoration of fragmented ecological networks.”</i></p> <p><i>“planting of additional trees and hedgerows (reflecting the character of the areas traditional hedgerows).”</i></p> <p><i>“new tree planting should be of a scale, location and type which adds value and optimises benefits to wildlife. New and replacement planting should be native or near native species and landscape maintenance and management plans should be agreed in writing with the local planning authority.”</i></p> <p><i>“biodiversity net gain should be targeted to improve habitats for key species recorded in the parish.”</i></p> <p><i>“design of new gardens should take account of the contribution gardens can make to enhancing wildlife and include trees and hedgerows in boundary treatments.”</i></p> <p><i>“consideration should also be given to Sustainable Drainage Schemes and the benefits they can provide for biodiversity and pollution control.”</i></p> <p><i>“proposals for new buildings (including non-residential development) should incorporate measures to protect wildlife species and enhance habitats including the incorporation of wildlife friendly measures such as:</i></p> <ul style="list-style-type: none"> <i>i) bat boxes and swift bricks,</i> <i>ii) hedgehog highways – gaps under fences to enable hedgehogs and other small mammals/amphibians etc to move freely</i> <i>iii) insect bricks</i> <i>iv) new garden native hedgerows and trees.”</i> <p>Sources:</p>

	<p>Wetheringsett cum Brockford Neighbourhood Development Plan 2022–2037 (Reg 16 Submission consultation) https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Wetheringsett-NP-Sub-Draft-Dec22.pdf</p> <p>Lavenham Neighbourhood Plan 2 2023-2037 Pre-Submission Version http://www.lavenhamnp2.onesuffolk.net/assets/pre-submission-consultation-dec-2022-feb-2023/LNP2.FINAL.Dec.2022.Spreads.small.pdf</p>
1.4	<p>How can the Parish Council retain habitats of value including wildlife corridors, ancient hedgerows, veteran trees, ponds etc in Sproughton when it has not identified where they are located? Where are the priority habitats in the parish where management may be enhanced? What is the condition of these habitats? What restoration should be undertaken? Where should new wildlife corridors be created? Where should new hedgerows be planted and how will they beneficially link into the ecological network? What protected and priority species are prevalent in the parish that might be displaced? These and other important biodiversity issues should be seamlessly incorporated into a Parish Biodiversity Action Plan / Ecological Assessment which can then form a key Appendix to the Sproughton Neighbourhood Plan and provide informed supporting evidence.</p>
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.” 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> 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> <p>Sproughton Parish Council, as a public authority, also has duties to conserve biodiversity under the Natural Environment and Rural Communities Act 2006. It can publish lists of its living organisms and types of habitats as part of a Parish Biodiversity Action Plan / Ecological Assessment, which can also</p>

	<p>include habitat and wildlife corridor network maps and data on priority species etc in accordance with the relevant sections of the NPPF.</p>
<p>2.2</p>	<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>  <p>Figure 1. The components of ecological networks (Making Space for Nature report)</p>
<p>2.3</p>	<p>The principles of creating coherent ecological networks have been embedded within many planning and policy documents:</p> <ul style="list-style-type: none"> • 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)

	<p>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</p>
3.	National Planning Policy Framework 2021
3.1	<p>National Planning Policy Framework 2021 (pages 50-54) - 15. Conserving and enhancing the natural environment – states:</p> <p>Habitats and biodiversity</p> <p><i>Para 179. “To protect and enhance biodiversity and geodiversity, plans should:</i></p> <p><i>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 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>
<p>4.</p>	<p>Ensuring that wildlife and the environment are protected and enhanced within your Neighbourhood Plan</p>
<p>4.1</p>	<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>
<p>4.2</p>	<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>
<p>4.3</p>	<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

	<p>• Help improve the resilience of your community to climate change” 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><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>7. Require wildlife friendly lighting for all development.</i></p> <p><i>8. Include an ambition for 20% Biodiversity Net Gain in your parish.</i></p> <p><i>9. Highlight the health and wellbeing benefits of improved access to nature for local people.”</i> 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</p>

	<p>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 Wherstead Parish Council as part of the development of the NP. This identified the parish's priority habitats and species, connectivity between wildlife habitats. 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. https://www.suffolkwildlifetrust.org/contact</p>
5.	Ecological Networks
5.1	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.
5.2	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.
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	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.
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 <ul style="list-style-type: none"> • Intact hedgerows and trees
5.6	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. https://www.alcester-tc.gov.uk/wp-content/uploads/2018/10/Alcester-Ecological-Report-Aug-2018.pdf
6.	Habitat datasets assessed (mapping as appropriate)
6.1	These can include: <ul style="list-style-type: none"> • Sites of Special Scientific Interest (SSSI) • Special Areas of Conservation (SAC) • Special Protection Areas (SPAs) • National Nature Reserves (NNRs) • 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 https://www.suffolkbis.org.uk/ https://magic.defra.gov.uk/magicmap.aspx https://www.acraew.org.uk/commissioners-decisions/suffolk https://www.dbr.org.uk/neighbourhood-plans/ https://almeleypc.org/wp-content/uploads/2018/07/Almeley-Parish-Council-Nature-Conservation-Plan-June-2018.pdf
7.	Priority Habitats (mapping as appropriate)
7.1	These can include: <ul style="list-style-type: none"> • Ancient Woodland • Arable field margins • Hedgerows • Lowland calcareous grasslands • Lowland meadows

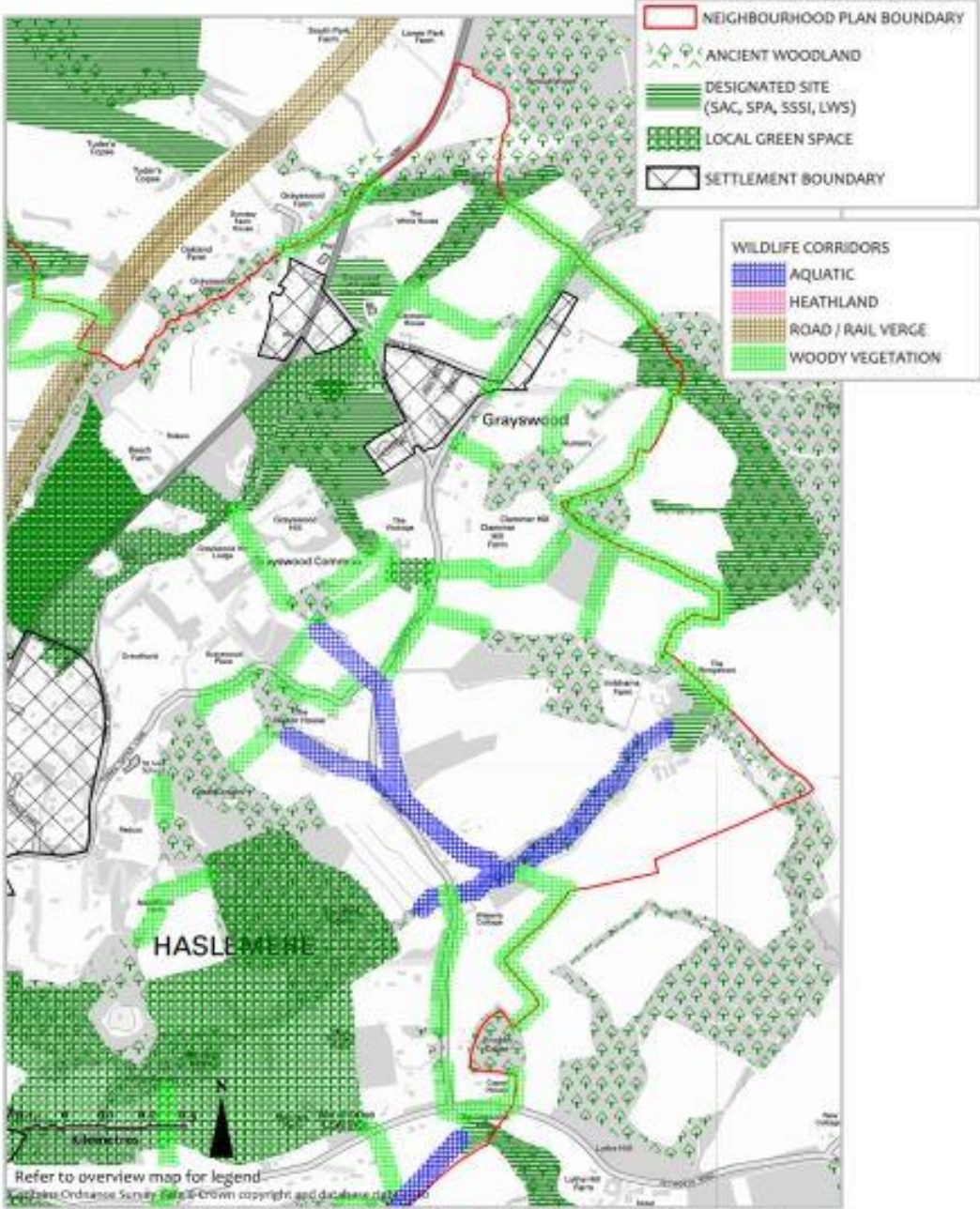
	<ul style="list-style-type: none"> • Lowland mixed deciduous woodlands • Ponds • Rivers and streams • Traditional orchards • Wood pastures and parklands <p><i>Wider Countryside</i></p> <ul style="list-style-type: none"> • Farmland • Improved grassland • Road verges (important for providing linkage between habitats) • 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://almeleypc.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.

	<ul style="list-style-type: none"> • 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. https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_3_Biodiversity_Paper_3-1.pdf
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. • 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 https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_3_Biodiversity_Paper_3-1.pdf
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. http://www.willaston-np.org.uk/files/Protecting_and_Enhancing_Willaston_Natural_Environment.pdf
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. http://www.horndeanbiodiversity.co.uk/files/Horndean%20Biodiversity%20Action%20Plan.pdf
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.

	<p>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> <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>

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.

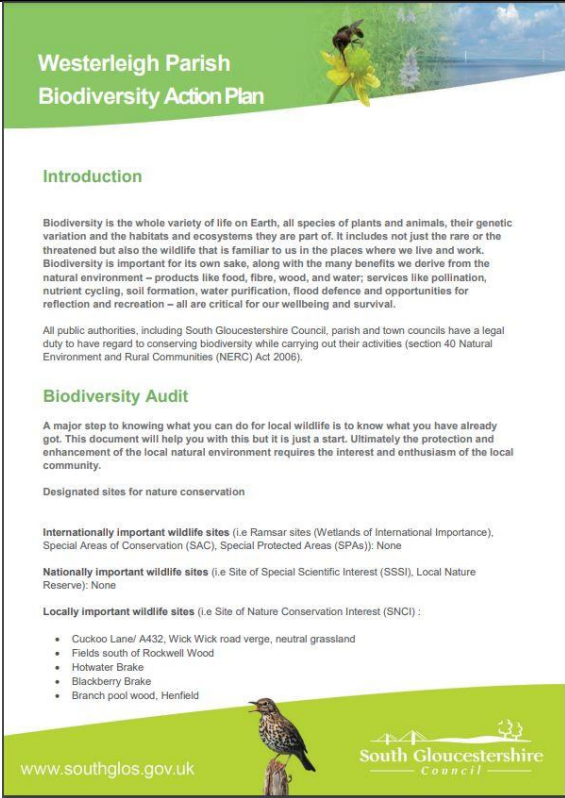
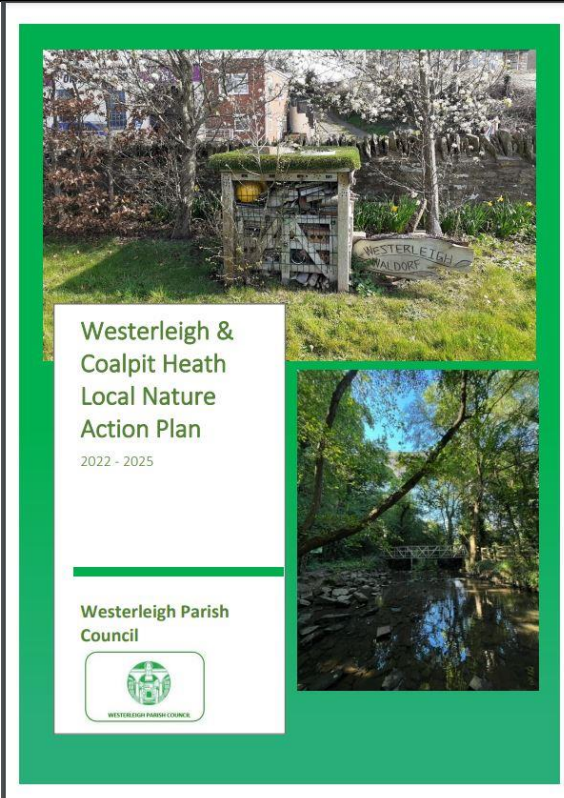


These maps have been produced using data from Surrey Biodiversity Information Centre, Sussex Biodiversity Record Centre, Hampshire Biodiversity Information Centre and Natural England.

	<p>Excellent extract above from the Haslemere Neighbourhood Plan Final Appendices. In total Appendix 3 has nine Wildlife Corridor Maps.</p> <ul style="list-style-type: none"> • Wildlife corridor maps and descriptions 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=Ed5XMjSW84fJVzB3uoe5w%3d%3d <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 <p><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></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 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.norfolkbiodiversity.org/habitats-and-species/ • Local Nature Recovery Strategy

	<p>https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network https://bucksmknep.co.uk/nature-strategy/overview/</p> <ul style="list-style-type: none"> • 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 • 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 very strong case can be made that every Parish should be taking local action to improve biodiversity in their administrative area. The Sproughton Neighbourhood Plan refers to Map 9 - Natural Heritage Trees and Woodland but only provides scant detail of habitats within the parish. In contrast, the following have been delineated in Defra's MAGIC Map:</p> <ul style="list-style-type: none"> - <i>Floodplain Grazing Marsh Priority Habitat</i> - <i>Deciduous Woodland Priority Habitat</i> - <i>Broadleaved Woodland (National Forest Inventory)</i> - <i>Mixed Woodland (National Forest Inventory)</i> - <i>Conifer Woodland (National Forest Inventory)</i> - <i>Traditional Orchards Priority Habitat</i> - <i>Woodpasture and Parkland BAP Priority Habitat</i> - <i>Good quality semi-improved grassland Priority Habitat</i> <p>Para 8.20 of the Plan refers to “<i>three County Wildlife Sites in the parish, in the vicinity of Sproughton Park, Burstall Long Wood and Hazel Wood.</i>” Reference is also made to the Chantry Cut Island site nature area. However, the Neighbourhood Plan gives no indication of the state and condition of the parish’s biodiversity and habitats and the connectivity of its ecological networks. Nationally, biodiversity sadly appears to be in decline. Is this position being repeated in Sproughton? What is the community proposing to do about it in terms of possible actions? These critical questions are not addressed in the Submission Plan.</p>
12.2	<p>I make the case that Sproughton Parish Council should prepare a Parish Biodiversity Action Plan / Ecological Assessment that meets the Council’s legal duties under the Natural Environment and Rural Communities Act 2006 and also feeds seamlessly into the emerging Neighbourhood Plan. It would also enable the Parish Council to meet its requirements under the National Planning Policy Framework and help develop and improve Parish BAP best practice that other Parishes and Communities may wish to follow across Suffolk and the immediate region. A solid foundation is being laid in the policy context of the Submission Plan, but serious planning mistakes can arise should shortcuts be taken which results in a flawed understanding of the parish’s ecological resource.</p>

12.3	<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>
12.4	<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.
12.5	<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>
12.6	<p>Further work by the community can then result in the delivery of a more detailed Local Nature Action Plan</p> <p>https://www.westerleighparishcouncil.org.uk/wp-content/uploads/2020/05/Westerleigh-and-Coalpit-Heath-LNAP-2022-25-Final.pdf</p>

		
12.6	<p>I make the case that an abbreviated Parish BAP / Ecological Assessment following the South Gloucestershire Council model can be produced very quickly and should not represent an onerous task. The Assessment should include habitat and wildlife corridor network maps and data on priority species etc in accordance with the relevant sections of the NPPF. With the skillsets available in the local community, Sproughton Parish Council may wish to consider the development of a more comprehensive Parish BAP / Ecological Assessment which can provide a useful resource at a planning appeal.</p>	
12.7	<p>Nationally, there are some other good examples of Local Biodiversity Action Plans / Ecological Assessments and work that has been undertaken in supporting the preparation of Neighbourhood Development Plans. These can be viewed in the attached Appendix – Biodiversity References below.</p>	
	<p>Richard Livall 2nd February 2023</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>

Haslemere Neighbourhood Plan

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

Haslemere Neighbourhood Plan Final Appendices

<https://www.waverley.gov.uk/Portals/0/Documents/services/planning-and-building/planning-strategies-and-policies/neighbourhood->

	<p>planning/Haslemere%20Neighbourhood%20Plan%20Final%20%20Appendices%201%20-%203.pdf?ver=Ed5XMjSW84fJVxzB3uoe5w%3d%3d</p> <p>Martock Neighbourhood Plan http://www.martockplan.org.uk/Drafts/Downloads/FinalVersion.pdf</p> <p>Martock Environmental Manual http://martockplan.org.uk/Documents/Supportingdocs/EnvManual.pdf</p> <p>Mylor Neighbourhood Plan https://mylorflushingplan.uk/wp-content/uploads/2021/06/MYLOR-NDP-Main-document-Submission-Draft-MB-180521.pdf</p> <p>Oulton Neighbourhood Plan https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Oulton/Oulton-Neighbourhood-Plan-Referendum-Version.pdf</p> <p>Oulton Neighbourhood Plan - Biodiversity and Green Corridors But no supporting document.</p> <p>Wherstead Neighbourhood Plan https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Wherstead-NP-Sub-Draft-Oct22.pdf</p> <p>Wherstead Neighbourhood Plan Landscape & Wildlife Evaluation Report https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Wherstead-NP-Landscape-Wildlife-Evaluation.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/</p>

	<p>https://bucksmknep.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://baberghmidsuffolk.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</p>

	<p>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&rgnCode=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>

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(11) BOYER PLANNING, obo Taylor Wimpey UK Limited

Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	Mark Edgerley
Job Title (if applicable):	Associate Director
Organisation / Company (if applicable):	Boyer Planning
Address:	Unit 15, De Grey Square, De Grey Road, Colchester
Postcode:	CO4 5YQ
Tel No:	0126 584 735
E-mail:	markedgerley@boyerplanning.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Taylor Wimpey UK Limited
Address:	Newton House, 2 Sark Drive, Newton Leys, Bletchley, Milton Keynes, Buckinghamshire
Postcode:	MK3 5SD
Tel No:	██████████
E-mail:	██████████

Section Two: Your comment(s)

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

Paragraph No.		Policy No.	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support		Oppose	
Support with modifications		Have Comments	

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

Please see representations submitted with this form.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please see representations submitted with this form.

(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 that a hearing should be held please explain below why this is necessary.

Note: 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 see representations submitted with this form.

(Continue on separate sheet if necessary)

Please indicate below if you wish to be notified of:

The publication of the Independent Examiners Report	x
The 'making' (adoption) of the Sproughton NP by Babergh District Council	x

Signed: Mark Edgerley	Dated: 3 February 2023
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Representations to Sproughton Neighbourhood Plan

Regulation 16

Boyer

Report Control

Project:	Wolsey Grange 2 – Representations to Sproughton NP
Client:	Taylor Wimpey
Reference:	17.6050
File Origin:	https://lrgcouk.sharepoint.com/sites/BoyerSP/Colchester Projects/2017/17.6050 Chantry Vale/8. Submission Records/8.04 Representations/Sproughton Neighbourhood Plan Reps/Regulation 16 Consultation/230203 Sproughton NP Reg 16 Representations.docx
Primary Author	AS/ME
Checked By:	ME

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	27 th January 2023	DRAFT	ME
2	3 rd February 2023	FINAL	ME

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Policy SPTN8 – Settlement Gaps	9
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APPENDIX

Appendix One – Site Location Plan

Appendix Two – Landscape Response

Appendix Three – Cultural Heritage Response

1. INTRODUCTION

- 1.1 These representations are submitted by Boyer on behalf of Taylor Wimpey in response to the consultation on the Sproughton Neighbourhood Plan (SNP) Submission consultation under the Regulation 16 of the Neighbourhood Planning Regulations.
- 1.2 These representations have been prepared with specific reference to Land north of the A1071 (the Site) as shown in Appendix 1. This site has also been identified as allocation LA013 in in the emerging JLP.
- 1.3 Taylor Wimpey submitted an Outline Application (DC/21/02671) for the site in May 2021, with all matters reserved except for access which, has been subject to extensive public consultation and engagement with the Parish Council, local community, service providers and statutory bodies.
- 1.4 The Outline Application was submitted alongside the Babergh and Mid Suffolk Joint Local Plan which was at the early stages of Examination following the appointment of Planning Inspectors in April 2021. At the time of submission to the Local Planning Authority the application was in accordance with the emerging plan.
- 1.5 Since the submission of the Outline Application, Taylor Wimpey have engaged proactively and constructively with Council officers, councillors, statutory bodies, service providers and the local community to ensure that proposals meet local requirements.
- 1.6 In January 2023, Babergh District Council Planning Committee approved the Officer recommendation for Outline Planning Permission to be granted subject to section 106 for the site under application DC/21/02671.
- 1.7 Taylor Wimpey has previously engaged with the Neighbourhood Plan by submitting representations to the Regulation 14 consultation in 2021. Representations have also been submitted to Babergh and Mid Suffolk District Councils in response to their emerging Joint Local Plan (JLP) over recent years.
- 1.8 As set out within National Planning Practice Guidance (NPPG), Neighbourhood Plan policies should be clear and unambiguous (Paragraph: 041 Reference ID: 41-041-20140306). Moreover, National policy and guidance requires that Neighbourhood Plans are in general conformity with the adopted Local Plan in their area (Paragraph: 065 Reference ID: 41-065-20140306). Whilst the current adopted Local Plan for Babergh is the Core Strategy 2014, Babergh is currently in the process of preparing a joint Local Plan with Mid Suffolk District Council. It is therefore necessary for the preparation of the Sproughton Neighbourhood Plan to be in general conformity with the reasoning and especially the evidence of the emerging Draft JLP to ensure that it is consistency between both documents (Paragraph: 009 Reference ID: 41-009-20190509).
- 1.9 The Basic Conditions relevant to the making of a neighbourhood plan are:

- Condition (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;
- Condition (d) the making of the neighbourhood development plan contributes to the achievement of sustainable development;
- Condition (e) the making of the neighbourhood development 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);
- Condition (f) the making of the neighbourhood development plan does not breach, and is otherwise compatible with EU obligations; and
- Condition (g) prescribed conditions are met in relation to the neighbourhood development plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood development plan.

1.10 It is our view that, as currently drafted, the Sproughton Neighbourhood Plan does not meet the Basic Conditions as it is not in conformity with the Draft JLP.

2. SPROUGHTON NEIGHBOURHOOD PLAN SUBMISSION DRAFT

- 2.1 Within this section of the representations, responses are provided to relevant policies in the Sproughton Neighbourhood Plan Submission Plan 2018-2037 and are made in keeping with the Response Form available on Babergh District Council's Website. The comments have been written in chronological order based on the SNP for ease of reference.

Planning Policy Context

- 2.2 Chapter 3 of the Sproughton Neighbourhood Plan provides the Planning Policy Context within which the document has been prepared. It is noted that information is provided in relation to the National Planning Policy Framework, the Babergh Local Plan and the emerging Joint Babergh Mid Suffolk Local Plan.
- 2.3 Identifying these national and district level documents is correct and the Neighbourhood Plan needs to reflect and broadly accord with the policies published in higher order documents to satisfy Basic Condition (e). However, Taylor Wimpey are concerned that although the plan identifies the relevant documents the interpretation of these and the procedural steps taken by the Neighbourhood Plan is not correct.
- 2.4 As noted within Chapter 3, the Neighbourhood Plan has been prepared in parallel with the Emerging Joint Local Plan for Babergh and Mid Suffolk. Unfortunately, this plan was paused at Examination stage in 2021 and at time of writing there is no indication as to when further progress will be made by Babergh and Mid Suffolk Councils.
- 2.5 In October 2021, the Sproughton Neighbourhood Plan Reg 14 consultation document was published which aligned with the emerging Local Plan as submitted by Babergh and Mid Suffolk. Within the Reg 14 document, land at Wolsey Grange 2 was identified as a site allocation which would have contributed to sustainable development and meeting the Neighbourhood Plans aims and objectives for the area.
- 2.6 Following the paused Examination, the communications from the Planning Inspectors and the Councils, there has been further delay as additional work is undertaken to meet requirements. The pause and additional work has undoubtedly elongated the Joint Local Plan Examination process and added greater uncertainty for all.
- 2.7 Despite this delay and uncertainty, the Sproughton Neighbourhood Plan has progressed to Reg 16 and has proceeded to make significant changes to their proposals by removing the land identified as Wolsey Grange 2.
- 2.8 In our view this represents a significant change from the previous version of the Neighbourhood Plan, and in order to satisfy the requirements of Basic Condition (a), (e) and (g), the Neighbourhood Plan should have been subject to a further round of Reg 14 consultation to ensure that all participants are provided with an "earlier" stage opportunity to engage with proposals.

- 2.9 Although it is for the plan making authority (in this instance the Parish Council) to justify their approach, we do not consider that the steps taken meet the Neighbourhood Planning Regulations and legislation has been properly fulfilled.
- 2.10 Taylor Wimpey have sought to engage regularly with Sproughton throughout the preparation and production of their Neighbourhood Plan, as a significant landowner within the plan area, but were only made aware of the significant change to the plan upon its publication under Reg 16.
- 2.11 Due to the delay in the Joint Local Plan Examination and the significant changes in the Neighbourhood Plan proposed by Sproughton, we consider that a further Reg 14 period of consultation should have been undertaken before proceeding to the Reg 16 and more formal stages of Neighbourhood Plan preparation. The Neighbourhood Planning regulations allow for earlier stages of consultation to be repeated in order to satisfy the Basic Conditions for plan preparation.
- 2.12 The example of the Tiptree Neighbourhood Plan in Essex and the Shobdon Neighbourhood Plan in Herefordshire both failed to pass the Basic Conditions at Examination and are of relevance to the Sproughton Neighbourhood Plan as detailed below.
- 2.13 The Tiptree Neighbourhood Plan was started in 2014 with the designation of the plan area. The local community began early stages of preparation, evidence gathering and engagement before periods of consultation leading to the Reg 16 consultation document being submitted to Colchester Borough Council (at that time). The Reg 16 consultation took place in June 2020 and the Examination commenced in August 2020. In December 2020, the Examiners Report¹ was published together with a joint statement² from Tiptree Parish Council and Colchester Borough Council with the Decision not to proceed to referendum.
- 2.14 The Examiners Report dated 9th October 2020 concluded that the plan does not meet the Basic Conditions, but that it would have met certain legal requirements – although it should not proceed to referendum. The joint statement response identified that main issues as being availability and reference to evidence for the spatial strategy, the Strategic Environmental Assessment and consideration of alternatives and the apparent conflict between the Tiptree Neighbourhood Plan and the Emerging Local Plan.

1

<https://cbccrmdata.blob.core.windows.net/noteattachment/Tiptree%20NDP%20Examination%20Report%20October%202020.pdf>

2

<https://cbccrmdata.blob.core.windows.net/noteattachment/Tiptree%20Neighbourhood%20Plan%20Joint%20Examination%20Response%20December%202020%201.pdf>

- 2.15 Since the publication of the Examiners Report the local community have undertaken the process of revising their Neighbourhood Plan, with revised Reg 14 consultation taking place in March 2022, followed by revised Reg 16 consultation starting in August 2022. In December 2022 the Examiner's Report³ was published along with a Reg 18 Decision Statement⁴ which concluded that subject to modifications the Neighbourhood Plan meets the basic conditions and can proceed to referendum.
- 2.16 We consider that the example of the Tiptree Neighbourhood Plan is relevant and provides an example of how a Neighbourhood Plan can reach various milestones but then fail to proceed to referendum, along with how earlier rounds of consultation can be redone to reflect changing circumstances.
- 2.17 The Shobdon Neighbourhood Plan progressed from Reg 14 to Reg 16, but significant changes to allocated sites and the settlement boundary were made. The Examiner appointed to undertake the Neighbourhood Plan Examination and the Examiners Report⁵ published December 2017 identified that Reg 14 consultation should have been re-run to ensure that robust site selection processes and evidence on site options were subject to appropriate consultation (Examiners Report para 1.2.6).
- 2.18 The Shobdon Examiner is clear that significant proposals were not consulted upon, as the Reg 16 consultation was the first opportunity that participants had to respond to the revised document, which fails the legal aspects on whether the Plan meets the basic conditions.
- 2.19 Following the Examination in 2017, the local community sought to undertake additional evidence gathering and plan preparation stages, including consultation in 2018, before a second Examination. In December 2018, a second Examiners Report⁶ was published which concluded that subject to modifications the revised and re-submitted Plan meets the basic conditions and can proceed to referendum. In March 2019, the Shobdon Neighbourhood Plan was made as part of the statutory development plan for Herefordshire Council.
- 2.20 We consider that the example of Shobdon in Herefordshire is similar to the circumstances currently seen in Sproughton. The qualifying body preparing the Neighbourhood Plan have made significant changes to the plan between the necessary consultation and participation stages without giving due consideration to the need for earlier stages to be re-run.

³ <https://cbccrmdata.blob.core.windows.net/noteattachment/CBC-null-tpn-Tiptree%20Neighbourhood%20Plan%20Examiner's%20Report%2015%20December%202022.pdf>

⁴ <https://cbccrmdata.blob.core.windows.net/noteattachment/CBC-null-s18-Section%2018%20Statement%20-%20Tiptree%20NHP%20-%20Redacted.pdf>

⁵ https://www.herefordshire.gov.uk/downloads/file/13282/examiners_report

⁶ <https://www.herefordshire.gov.uk/downloads/file/16601/examiners-report-january-2019>

2.21 Although the decision by Babergh Planning Committee in January 2023 is after the publication of the Sproughton Neighbourhood Plan Reg 16 document, we consider that any future amendments to the plan should reflect the approval (subject to s106) of planning application DC/21/02671 on land within the plan area. Taylor Wimpey are committed to working with Babergh District Council, Suffolk County Council and Sproughton Parish Council to bring forward the outline application which has been permitted and the Neighbourhood Plan should reflect this recent decision through any future amendments or modifications.

Policy SPTN1 – Spatial Strategy

- 2.22 Policy SPTN1 seeks to accommodate development which is commensurate with Sproughton's position in the district's Settlement Hierarchy.
- 2.23 The Babergh Core Strategy (2014) and Policy CS2 identifies the Settlement Pattern Policy for communities across Babergh which includes Sproughton. Sproughton is identified as a Hinterland Village, but the plan also recognises that parts of Sproughton are within the higher order Babergh Ipswich Fringe (edge of urban area) as explained in 2.1.2.3 of the 2014 Core Strategy.
- 2.24 The emerging Joint Local Plan (2020) prepared by Babergh and Mid Suffolk Councils provides a Settlement Hierarchy in Policy SP03 and Table 2 which clearly defines Sproughton within the Babergh Ipswich Fringe which is the highest order of settlement.
- 2.25 Although the Council's approach to settlement hierarchy and site selection has been a fundamental issue which is yet to be resolved by the Local Plan Examination and the Planning Inspectors appointed. However, it is clear that Sproughton, and most certainly the part of the parish which is "Ipswich side" of the A14, should be a higher order settlement when considered against the Babergh Settlement Hierarchy.
- 2.26 As a result of this, we are concerned that Policy SPTN1 does not accurately reflect the prominent role that Sproughton has within the Babergh district Settlement Hierarchy in that the Neighbourhood Plan does not include any allocations to meet the growth requirements and development opportunities identified in the Local Plan (both adopted and emerging).
- 2.27 Policy SPTN1 identifies that settlement boundaries are defined on the Policies Map, but these are very restrictive and instead of promoting growth and development in a highly sustainable location, such as Babergh Ipswich Fringe, the Neighbourhood Plan limits any future opportunities for growth over the plan period.
- 2.28 As currently presented, Policy SPTN1 does not provide a robust basis for an overarching Neighbourhood Plan strategy, and therefore does not meet the Basic Conditions.

Policy SPTN2 – Housing Mix

- 2.29 As a national housebuilder Taylor Wimpey recognises the need to deliver a range of housing options to ensure that a mix and choice of properties is made available on development sites.
- 2.30 However, it is essential that policies which focus on Housing Mix, such as Policy SPTN2 provide sufficient flexibility to allow for changing needs to be catered for. Such flexibility is especially needed within planning policies that provide seek to cover an extended period of time such as the Sproughton Neighbourhood Plan which has a plan horizon of 2018-2037.
- 2.31 Taylor Wimpey is pleased to see that Policy SPTN2 provides a percentage target for three bedroom homes, but also includes the circumstances where a flexible approach could be taken depending on the justification at the time. It is also positive to see that the policy takes into account that information relating to housing needs can change and evolve over time.
- 2.32 Policy SPTN2 makes reference to “homes” and “bungalows” and “affordable housing” in relation to Housing Mix. The text supporting the policy also references “houses” and it is unclear if the policy would support flats or apartments as part of the housing mix on a development.
- 2.33 Policy SPTN2 also includes two separate subsections which are individually numbered. These are however numbered i) and ii) and then once more i) and ii). In our view this would lead to confusion for an applicant and a decision maker in terms of referencing specific policy requirements.
- 2.34 The intention behind a policy on housing mix is supported and Taylor Wimpey support the Council with flexibility that is included within it, however we are concerned that it does not meet Basic Condition (d) or Basic Condition (g) in that it is unclear as to what type of dwellings may be appropriate within the mix and the policy subsections are duplicated.

Policy SPTN7 – Area of Local Landscape Sensitivity

- 2.35 The Sproughton Neighbourhood Plan identifies part of the parish as “Valued Landscape” as shown on Map 5 of the Regulation 16 document. Policy SPTN7 then states that development proposals within the Valued Landscape will only be permitted where they protect and enhance the special landscape qualities of the area.
- 2.36 CSA Environmental have been supporting Taylor Wimpey with landscape proposals for the outline planning application submitted, along with the representations for the Neighbourhood Plan.
- 2.37 CSA have reviewed the evidence base that the Neighbourhood Plan has been prepared against and a series of other landscape evidence documents that relate to Sproughton and the Joint Local Plan for Babergh and Mid Suffolk. A detailed response from CSA Environmental is provided in full in appendix 2.

- 2.38 Taylor Wimpey is concerned that the evidence base supporting the Neighbourhood Plan is not consistent and although reference to various studies has been made there is conflict between these. It is noted that the Neighbourhood Plan relies on evidence prepared which does not align with that prepared as part of the emerging Joint Local Plan and therefore we consider that Policy SPTN7 fails Basic Condition (g). The response by CSA Environmental in appendix 2 provides further information on the differences between the evidence bases that the Neighbourhood Plan is supported by and how this relates to landscape evidence and the Environmental Statement prepared by Taylor Wimpey for application DC/21/02671.
- 2.39 Despite the differences identified in the evidence base documents, the notion of valued landscapes are not identified in the information prepared to inform the Neighbourhood Plan. As a result, the boundaries of the “Valued Landscape” as seen on Map 5 are unjustified as these do not follow the evidence prepared or any logical topographic or landscape features in the area. The identification of “Valued Landscapes” therefore fail to satisfy Basic Conditions (d) and (e).

Policy SPTN8 – Settlement Gaps

- 2.40 Taylor Wimpey support the principle of the policy relating to Settlement Gaps identified on Map 6 and the Policies Map as it is important to retain the identify of settlements across areas.
- 2.41 We are however concerned that the policy and the annotations on the Policies Map are unclear and do not provide the applicant or a decision maker with clear guidance as to how to interpret the policy.
- 2.42 The Settlement Gaps annotation on the Policies Map shows a dotted line through parts of the parish and it is unclear as to whether the “gap” relates to the area of the dotted line or a wider area?
- 2.43 The development at Wolsey Grange 2 has been designed to keep the undeveloped nature of Hadleigh Road and Church Lane and therefore will enable the physical and visual separation of settlements and will not compromise the integrity of the settlement gap.

Policy SPTN9 – Protection of Important Views

- 2.44 Taylor Wimpey is concerned with the policy as drafted in the Neighbourhood Plan and the views identified on Map 5. Map 5 identifies a number of viewpoints across the plan area which the Neighbourhood Plan considers to be important. However, it is unclear how these viewpoints have been identified and what the key features of these are, which does not satisfy Basic Condition (d), (e) and (g).
- 2.45 CSA Environmental have been supporting Taylor Wimpey with work on the Environmental Statement, outline planning application and Neighbourhood Plan. CSA do not consider that these views are particularly notable, and the information supporting them does not justify their identification as Important Views.

- 2.46 Further commentary provided by CSA Environmental can be found in appendix 2.
- 2.47 Although not specifically mentioned in Policy SPTN9, we are concerned about the annotations shown on Map 8 which looks at Green Infrastructure Network across the parish of Sproughton.
- 2.48 Map 8 identifies a potential green corridor project with access and potential site based green infrastructure project. These annotations are on land in the control of Taylor Wimpey and without further specific reference and detail included within the Neighbourhood Plan the purpose is unclear and therefore should not be included within the plan.

Policy SPTN10 – Local Green Spaces

- 2.49 Taylor Wimpey is pleased to see that the Neighbourhood Plan Policy on Local Green Spaces has been amended in light of consultation comments received previously.
- 2.50 In the Regulation 14 consultation document published in September 2021, Policy SPTN10 included a designation at “Green triangle at junction of Hadleigh Road with ‘First Strokes’ swimming pool”.
- 2.51 Taylor Wimpey support the removal of this area as a Local Green Space and are pleased to see that Policy SPTN10 in the Regulation 16 consultation document does not include such as designation.
- 2.52 The area adjacent to the First Strokes swimming pool is in the ownership and control of Taylor Wimpey and forms part of the overall development proposed as Wolsey Grange 2.

Policy SPTN13 – Heritage Assets

- 2.53 The Sproughton Neighbourhood Plan acknowledges the historic environment across the parish and identifies two objectives to provide the foundation for a specific policy on Heritage Assets. The plan is clear that in order to conserve and enhance the heritage assets and their settings any development proposals will require planning permission and separate Listed Building consent. The importance of the National Planning Policy Framework is also highlighted and references how Local Plan and Neighbourhood Plan policies will also apply.
- 2.54 Policy SPTN13 provides specific focus on Heritage Assets and includes a range of policy requirements listed from a-f. On behalf of Taylor Wimpey, RPS have been commissioned to provide a detailed review of the policies relating to the historic environment alongside the site specific evidence base documents prepared to support the planning application submitted for Wolsey Grange 2.
- 2.55 RPS have reviewed the Neighbourhood Plan objectives for the historic environment along with Policy SPTN13 and consider that the details within the policy are a typical local policy approach which supports the delivery of appropriate changes within the historic environment.
- 2.56 A detailed review of the Neighbourhood Plan alongside the historic and cultural evidence supporting the current plan by RPS is provided in Appendix 3.

Policy SPTN21 – Public Rights of Way

- 2.57 The Neighbourhood Plan provides opportunity for considering highways and movements throughout the parish of Sproughton and by providing policy context for these issues, the plan sets a number of clear objectives.
- 2.58 Policy considerations such as how movement through a particular area should be identified within a Neighbourhood Plan as these will provide opportunity for journeys to be made via sustainable forms of transport and utilising the existing (or new) network of footpaths and bridleways found within an area.
- 2.59 Policy SPTN21 is supported by Map 12 which details the current Public Rights of Way Network within Sproughton. It is noticeable that some of these still remain severed following the introduction of the A14 which divides the area. It is also clear how the existing network provides connections to the urban and recreational areas found in neighbouring Ipswich.
- 2.60 The supporting text and the policy text are broadly supported, but Taylor Wimpey are concerned that the objectives of the policy are not achievable without the specific identification of land at Wolsey Grange 2.
- 2.61 Policy SPTN21 contains four policy criterion, but without positive site allocations and development proposals the policy will not meet its stated objectives and therefore will not aid the delivery of sustainable development as required by Basic Condition (d).
- 2.62 As currently prepared it is unclear as to how the Neighbourhood Plan will enable the creation of new public rights of way (including bridleways) within Sproughton or how these will be secured or funded. SPTN21 (iv) also highlights the role of signage to encourage community and visitor use of the public rights of way but without identifying how this will be done in conjunction with third party landowners.
- 2.63 The site identified as Wolsey Grange 2 is perfectly placed to enable the objectives of the Policy SPTN21 to be achieved through positive site allocations and collaboration as development proposals are brought forward.
- 2.64 Wolsey Grange 2 is in control of Taylor Wimpey who understand and acknowledge the benefit of high quality public rights of way connections. By working in conjunction with Taylor Wimpey the local community can ensure that the relevant connections which will reduce vehicular traffic and increase accessibility throughout the parish can be achieved in a positive and plan led manner.
- 2.65 As currently prepared Policy SPTN21 does not meet Basic Condition (d) in that it will fail to deliver sustainable development at the public rights of way can not be extended as required.

Policies Map

- 2.66 Taylor Wimpey is pleased to see that the policies within the Neighbourhood Plan are presented on a Policies Map where appropriate. The Policies Map provides detail for the reader and will enable future decision makers to make judgements based on the geographical representation of the policies.
- 2.67 However, as highlighted above in relation to specific policies some aspects of the Policies Map are unclear and need further consideration in order for it to satisfy Basic Condition (a).

3. LAND NORTH OF THE A1071, IPSWICH

Introduction

- 3.1 Over a number of years, various forms of consultation and engagement has been undertaken in respect of the previous allocation of land north of the A1071, Ipswich in the Neighbourhood Plan. This has included various meetings with the Parish over this period.
- 3.2 A Workshop was also held with the Parish to discuss the evolution of the Proposed Development in May 2019 and a preview session held in advance of the Public Consultation Event in September 2019.
- 3.3 Post-submission meetings have also been held with the Parish following the application submission in May 2021 which demonstrates that Taylor Wimpey have been proactive in their engagement with the local community alongside promotion of the site through the Neighbourhood Plan and also the Joint Local Plan preparatory stages.

Outline Planning Application

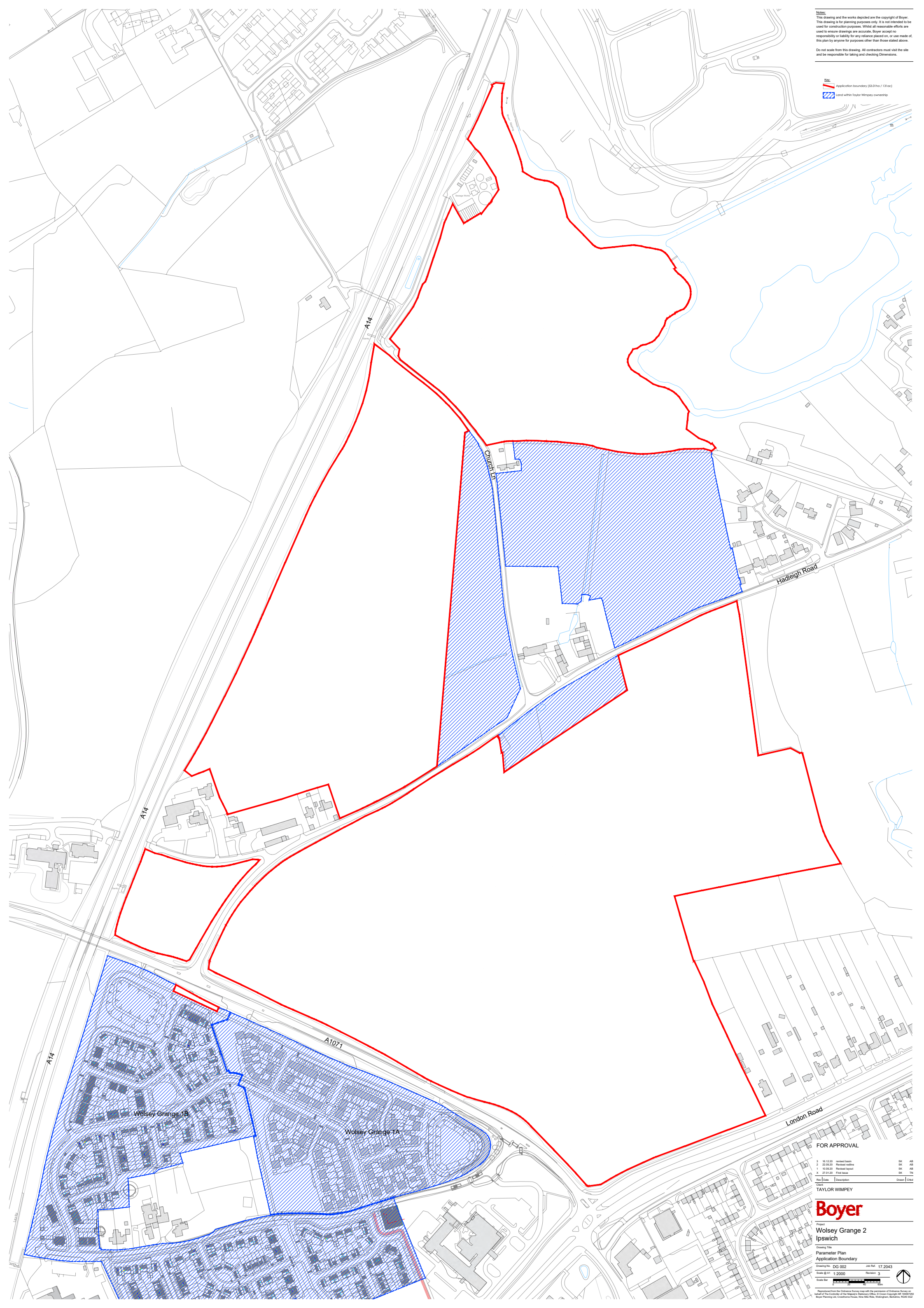
- 3.4 Following continued site promotion since 2014 and extensive engagement with statutory consultees and the Parish, an outline planning application for Land North of the A1071, Ipswich was submitted in May 2021 by Taylor Wimpey. A plan showing the site boundary can be found in Appendix 1.
- 3.5 The planning application is for the residential development of up to 750 dwellings, up to 3ha of primary education land, public open space, Sustainable Drainage systems, landscaping and highways improvements, with all matters reserved except for access. A comprehensive evidence base has also been prepared to support the application which includes an Environmental Statement along with assessments and reports covering key aspects such as heritage and landscape, alongside details relating to drainage and highways. The application documents show that the site is deliverable and achievable and confirm Taylor Wimpey's commitment to bringing forward the site.
- 3.6 The masterplan for the site is landscape led, with multiple open spaces for play and habitat creation. The development delivers multiple benefits to the community such as 35% affordable homes, Public Green Space, 18% Biodiversity Net Gain, and land for primary education.
- 3.7 Taylor Wimpey is committed to creating an exemplar sustainable high-quality development on the Site which makes a much needed housing across Babergh and Mid Suffolk over the Neighbourhood and Local Plan period.
- 3.8 In January 2023, Babergh District Council Planning Committee approved the Officer recommendation for Outline Planning Permission to be granted for the site under application DC/21/02671.

- 3.9 Following the Planning Committee decision, Taylor Wimpey, supported by the project team, will be working with Babergh District Council to confirm Conditions and s106 agreement to guide the future development of land to be known as Wolsey Grange 2.
- 3.10 The residential development will come forward in a phased manner and will contribute to the housing land supply in Babergh for the next 10-15 years depending on timescales for implementation and build out rates.

APPENDIX ONE – SITE LOCATION PLAN

Notes:
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Do not scale from this drawing. All contractors must visit the site and be responsible for taking and checking dimensions.

Application boundary (33.01ha / 131ac)
Land within Taylor Wimpey ownership



FOR APPROVAL

Rev	Date	Description	Drawn	Check
3	18.12.20	Issued for plan	SK	AB
2	22.05.20	Revised layout	SK	AB
1	16.05.20	Revised layout	SK	AB
A	27.01.20	First issue	SK	TH

Client
TAYLOR WIMPEY

Boyer

Project
Wolsey Grange 2
Ipswich

Drawing Title
Parameter Plan
Application Boundary
Drawing No. DG 002 Job Ref. 17.2043
Scale @ A1 1:2000 Revision 3
Scale Bar

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APPENDIX TWO – LANDSCAPE RESPONSE

Landscape Response to Sproughton Neighbourhood Plan 2018 - 2037, Submission Plan

Land North of the A1071, Ipswich, January 2023

1.0 Introduction

- 1.1 This Landscape Response has been prepared by CSA Environmental on behalf of Taylor Wimpey UK Ltd to formerly respond to the Sproughton Neighbourhood Plan ('SNP') Regulation 16 Submission Consultation. The SNP contains a number of landscape policies which could impact on the proposed development at land north of the A1071 (the 'Site'), which was previously identified as allocation LA013 in the emerging Babergh Mid Suffolk Draft Joint Local Plan (the 'Draft JLP').
- 1.2 In May 2021, Taylor Wimpey submitted an outline planning application (the 'planning application'), with all matters reserved except for access, for a residential development of up to 750 dwellings, up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements on the Site (Planning Ref: DC/21/02671).
- 1.3 This response considers the relevant landscape policies and the landscape evidence base documents which are referred to in the SNP.

2.0 Landscape Evidence Documents

Landscape Appraisal: Sproughton Neighbourhood Plan (Alison Farmer Associates, February 2021)

- 2.1 Alison Farmer Associates ('AFA') were appointed by the SNP Committee to prepare a landscape appraisal of the Parish and in particular to establish the sensitivity and capacity of land in the Parish to accommodate housing and employment development. Amongst other things the appraisal considers important views, areas of distinct character and landscape corridors, and provides a sensitivity / capacity assessment of four Local Landscape Areas ('LLA'), with the Site located in Local Landscape Area 4: Chantry Vale and Hermitage Farm.
- 2.2 The appraisal describes a number of important views within the Parish. These include views across Chantry Vale, which are described as follows:

'There are also distinctive views from Chantry Vale. Whilst these do not relate so closely to the village of Sproughton, (due to its position within the valley and the presence of the A14 which passes through the valley on

an embankment), they are particularly valuable in providing a setting and approach to Ipswich. Here there are elevated views across the vale as one approaches Ipswich along the Hadleigh Road. The historic cluster of red brick buildings associated with Red House Farm form a focal point within the undulating valley sides and the pattern of mature trees and hedgerows gives a mature and established character. There are views to Ipswich, but these appear distant. New development on elevated slopes above the Vale appear on the skyline.'

- 2.3 The appraisal does not identify specific viewpoints on a plan. However, the description and photo panels contained within the appraisal clearly identify that these views are on the approach to Ipswich on Hadleigh Road and encompass the buildings and valley floor in the vicinity of Red House. It should be noted that the current proposals for development at the Site have carefully considered the views from Hadleigh Road and the setting of Red House, and development has been sited to maintain a view corridor to the listed building.
- 2.4 The appraisal identifies a number of areas of distinct character within the Parish. These are identified on the mapping on Figures 4 and 5. However none of these areas fall within or in proximity to the Site.
- 2.5 Section 5 of the appraisal contains an assessment of the local landscape areas. The appraisal states that it builds on work previously undertaken in the Settlement Sensitivity Assessment which was also undertaken by AFA on behalf of Ipswich, Mid Suffolk and Babergh Councils. However, it does not make reference to the subsequent Landscape Sensitivity Assessment of SHELAA Sites undertaken by Land Use Consultants ('LUC') in 2020 on behalf of Babergh and Mid Suffolk Councils. This appears a significant omission, particularly as this report is a key evidence base document which informed the spatial strategy for the Draft JLP. The LUC assessment specifically considers the sensitivity / capacity of the Site and arrives at different conclusions to those reached in the AFA documents.
- 2.6 The appraisal considers the Site within Local Landscape Area 4: Chantry Vale and Hermitage Farm. This area includes the Site and land in the vicinity of Red House, together with a parcel of land to the west of the A14 in the vicinity of the junction with the A1071. The appraisal considers Local Landscape Area 4 against a series of landscape criteria and follows a similar format to the LUC assessment. A copy of the AFA appraisal is contained in **Appendix A**, and for comparison the LUC assessment of SHELAA sites SS0191, SS0954, and SS1024 (which make up the Site) is contained in **Appendix B**.
- 2.7 The AFA appraisal concludes in respect of Landscape Area 4 and the Site:

'The valley sides around The Red House have a high sensitivity (despite being east of the A14 and in close proximity to the existing urban edge of Ipswich)

due to their intact rural character, setting to historic buildings at Red House, visual connectivity to the wider landscape to the west and high visibility. The proximity of this area of countryside, close to Ipswich is in easy reach of the local population and forms valued access to natural greenspace as well as a distinctive and high-quality approach to Ipswich. This landscape has little to no capacity for further development without loss of these qualities. Furthermore, farmland immediately surrounding Red House Farm is covenanted, restricting its use other than as agricultural land.'

- 2.8 This conclusion suggests that the valley sides around Red House have limited capacity to accommodate development. However, this conclusion is contrary to the findings of the LUC assessment which concluded:

'These sites are assessed as having moderate sensitivity to residential development due to the undulating agricultural character, close proximity to heritage assets, and strong connection to Ipswich. The road network and lack of semi-natural features reduce sensitivity.'

- 2.9 The AFA findings are also contrary to the detailed assessment set out in the landscape chapter of the Environmental Statement prepared by CSA, which states the following in respect of the Site's landscape sensitivity.

'The Site's sensitivity is influenced by its proximity to existing built development on and adjacent to its boundaries, including the building out of Wolsey Grange 1a to the southwest. The detracting features discussed above further reduce its sensitivity, including the road transport network which bounds and bisects it, the distribution unit at Sroughton Enterprise Park and post-mounted overhead electricity cables, which cross and follow parts of the Site's boundaries. Given these influences and the adjoining listed buildings, the land on the lower slopes of the Site, away from new and existing development, and away from the larger roads (A14 carriageway, A1071 road and London Road) in the area is assessed as being of medium high landscape sensitivity, while the rest of the Site is assessed as being of medium landscape sensitivity.'

- 2.10 It is also worth noting that the AFA Landscape Appraisal for the Neighbourhood Plan does not assess landscape value, nor does it conclude that the Site, or parts of the Site are a Valued Landscape. The appraisal considers the sensitivity of the land parcel, but it does not provide a detailed assessment of the factors which contribute to landscape value in line with Box 5.1 of Guidelines for Landscape and Visual Impact Assessments ('GLVIA', 2013), or the Landscape Institute's Technical Guidance Note 02/21, 'Assessing Landscape Value Outside National Designations'.

Landscape Appraisal: Land at Red House, Chantry Vale, Sproughton
(Alison Farmer Associates, September 2019).

- 2.11 This document is referred to in the Sproughton Neighbourhood Plan. It was also produced by AFA on behalf of the owners of Red House, and it was not commissioned by Sproughton Parish Council. It pre-dates the Neighbourhood Plan Landscape Appraisal.
- 2.12 The assessment focuses on the landscape / townscape in the vicinity of Red House and in response to the emerging Local Plan and the potential draft allocation of land for development at the Site. It concludes that the landscape in the vicinity of Red House has many special qualities which support its consideration as a valued landscape. This assessment is used as the basis for the Sproughton Neighbourhood Plan to identify the Chantry Vale Area as a Valued Landscape. As set out above, this conclusion is not consistent with the findings of both the LUC assessment, and the landscape chapter of the Environmental Statement prepared by CSA.

3.0 Policy SPTN 7 Area of Local Landscape Sensitivity

- 3.1 Policy SPTN7 identifies a large part of allocation LA013 as a valued landscape as shown on Map 5 – Protected Landscapes. The policy states that development proposals within this area will only be permitted where they protect and enhance the special landscape qualities of the area.
- 3.2 However, valued landscapes are not identified in the Sproughton Neighbourhood Plan Landscape Appraisal, which was specifically prepared to inform Neighbourhood Plan policies. It does contain an assessment of the landscape sensitivity of the draft allocation LA013 and identifies the valley sides around Red House as being of high landscape sensitivity, but it does not specifically consider the landscape value of this land. To inform judgements on landscape value, the Neighbourhood Plan appears to rely on the findings of the landscape appraisal for the Land at Red House. This document was prepared by AFA on behalf of a private client and to support representations to the draft Local Plan and the emerging allocation at LA013.
- 3.3 The findings of both AFA assessments do not align with landscape evidence prepared for the draft JLP by LUC, which concludes that this landscape has a moderate landscape sensitivity to development. Furthermore, a detailed assessment of the landscape quality, sensitivity and value of the Site is set out in the landscape chapter of the Environmental Statement prepared by CSA. This chapter was prepared in close consultation with Babergh and Mid Suffolk District Council's landscape advisors Place Services. This chapter concludes that the Site

is of medium landscape value and it is not therefore considered a 'valued' landscape against part a) of paragraph 174 of the NPPF July 2021.

- 3.4 The area identified on Map 5 of the draft Neighbourhood Plan as forming a valued landscape occupies a parcel of land in the vicinity of Red House and appears focused on the sloping valleys sides around the listed building which are identified as being of high sensitivity in the Neighbourhood Plan Landscape Appraisal. However, it is unclear from this plan or the associated policy, what has informed the boundaries of this parcel, particularly the western edge of this area which follows no logical topographic or landscape feature.
- 3.5 The landscape chapter of the Environmental Statement, whilst it does not find that the allocated Site LA013 forms part of a valued landscape, it does acknowledge that the sloping valley landform in the vicinity of Red House is of medium high landscape sensitivity. The findings of the landscape chapter, which have been informed by site visits and extensive consultation with the council's landscape advisors, have dictated the extent of the proposed development within the Site, in order to respect the existing landform, landscape character and key views from Hadleigh Road. The extent of the valued landscape shown within the Neighbourhood Plan would conflict with these proposed development areas and there appears no reasoned justification to support the boundaries of the area shown on Map 5.

4.0 Policy SPTN 9 – Protection of Important Views

- 4.1 Policy SPTN9 states that important views identified on Map 5 and the Policies Map shall be maintained. It states that proposals for new buildings should be accompanied by a landscape and visual appraisal which demonstrates how the proposal:
 - a) *'can be accommodated in the countryside without having a detrimental impact, by reason of the building's scale, materials and location, on the character and appearance of the countryside and its distinction from the built-up area*
 - b) *conserves and enhances the unique landscape and scenic beauty within the parish, having regard to the types of valued views identified and described in the Neighbourhood Plan Landscape Appraisal*
 - c) *protects the key features of the important views'*
- 4.2 Map 5 and the Policies Map identify a number of viewpoints both within and in proximity to the Site. However, it is unclear from the policy and from the supporting evidence why these viewpoints have been identified and what the key features of these views are. The Neighbourhood Plan Landscape Appraisal describes a number of important views which include views across Chantry Vale. The

description and photo panels contained within this appraisal clearly identify that these views are on the approach to Ipswich on Hadleigh Road and encompass the buildings and valley floor in the vicinity of Red House. In addition to these viewpoints, Map 5 identifies several viewpoints on footpaths which cross the Site. These appear to coincide with viewpoints identified in the Landscape Appraisal for Red House. However, these views are not identified as particularly notable and there is no supporting information to justify their identification as Important Views.

- 4.3 The proposed development at the Site is supported by a landscape and visual assessment ('LVIA') as part of the Environmental Statement. The key viewpoints were discussed and agreed with the Council's landscape advisor, including views from Hadleigh Road. The LVIA concluded that following implementation and establishment of mitigation there were no residual 'significant' visual effects resulting from the proposed development on public views. The Council's Landscape advisor (30.07.2021) subsequently commented on the planning application and confirmed:

'We agree with the assessed level of effect on landscape receptors...In terms of visual amenity, we agree with the chosen visual receptors and have no concerns regarding the number of viewpoints or verified views.'

5.0 Conclusion

- 5.1 The Sproughton Neighbourhood Plan ('SNP') Regulation 16 Submission Consultation document includes a number of draft landscape policies which could impact on the proposed development on land north of the A1071, Ipswich.
- 5.2 Policy SPTN 7 - Area of Local Landscape Sensitivity identifies part of the Site as being within a Valued Landscape. This is a restrictive policy which would appear to align with part a) of paragraph 174 of the NPPF which aims to protect and enhance valued landscapes. Whilst it is important to protect valued landscapes, the identification of part of the Site as a valued landscape is not supported by other landscape evidence prepared by LUC in respect of the former allocation LA013, and the findings of the Environmental Statement which accompanied the planning application.
- 5.3 Policy SPTN 9 – Important Views identifies a number of viewpoints within the Site and the immediate area. However, there is limited evidence provided to support the identification of the majority of these views. Again, these views impose a restraint on the ability of the Site to deliver development and need to be fully justified.

Appendix A

Extract from Landscape Appraisal: Sproughton Neighbourhood Plan
(Alison Farmer Associates, February 2021)

Local Area 4: Chantry Vale and Hermitage Farm

Relevant Planning Sites	SHELAA site SS0299, Local Plan allocation LA014 and Planning Application DC/20/04177 (under construction) SHELAA site SS0954, SS0191, and SS1024, Local Plan allocation LA013 SHELLA site SS1124
Physical Character	Valley side and valley floor landscapes ranging from c. 10m AOD to c. 30m AOD to the east of the A14 and slightly higher plateau landscape c. 40m AOD to the west at Hermitage Farm. There is a notable break in slope around the 35m contour below which the valley sides are steeper. The valley sides are predominately arable in medium scale fields, whereas on the plateau field sizes are larger. As with the valley side landscape around Sproughton village this area is also characterised by the presence of natural spring fed streams which have influenced the location of Red House Farm.
Existing Settlement Edge	From this landscape there are distant views across the Gipping Valley towards Ipswich on the opposite valley sides. South of the Gipping the existing urban edge of Ipswich is well vegetated or set back on higher land beyond the valley. However, new development associated with Worsely Grange to the south of the A1071 is visible on the skyline. The High Bay Distribution Unit on the valley floor appears out of scale with the landscape, but its light colour and simple form mean it many lighting conditions, it does not stand out against the sky. This landscape offers one of the most attractive approaches to Ipswich along the Hadleigh Road. Development west of the A14 comprises a hotel which is located on the upper slopes of the valley and partially screened by vegetation. South of Hermitage Farm there are a line of pylons.
Views and Visibility	The valley side topography makes much of this area highly visible. The open agricultural southern valley slopes in the vicinity of The Red House, between the A14 and existing urban edge of Ipswich are visually prominent giving rise to a rural context to Ipswich and the River Gipping as well as reinforcing perceptions that this section of the Gipping Valley is separate from Ipswich, the urban edge of which lies beyond. West of the A14 the land around Hermitage Farm forms part of a ridge of higher plateau farmland. The edges of this landscape north of the A1071 are visually sensitive when viewed from the north and from the Belstead Brook to the south.
Designation/Condition	The buildings at Red House Farm are listed and this landscape is largely intact comprising pre 18 th century enclosures. The topographic variation across the valley sides coupled with historic character and rural land uses gives rise to a distinctive sense of place which has a coherence and physical intactness. Although the A14 cuts through this area it is in cutting and its margins are well vegetated such that it does not visually intrude, although it is audible. Fragmentation occurs at its margins as a result of infrastructure and new housing development which has an urbanising influence.
Perceptual Qualities	Some noise intrusion from the A14 and some urbanisation through signage, linear development, A14 junctions, pylons, and road infrastructure. Away from these influences there is a sense of tranquillity and strong sense of place. The Hadleigh Road has been noted as 'one of the most attractive approaches into Ipswich'.

Function	Important rural setting to Ipswich suburbs. Important physical and perceptual gap between the valley landscape and Ipswich. Important habitat network along river. Gipping Way Long Distance Route.
Sensitivity/Capacity	<p>The valley sides around The Red House have a high sensitivity (despite being east of the A14 and in close proximity to the existing urban edge of Ipswich) due to their intact rural character, setting to historic buildings at Red House, visual connectivity to the wider landscape to the west and high visibility. The proximity of this area of countryside, close to Ipswich is in easy reach of the local population and forms valued access to natural greenspace as well as a distinctive and high-quality approach to Ipswich. This landscape has little to no capacity for further development without loss of these qualities. Furthermore, farmland immediately surrounding Red House Farm is covenanted, restricting its use other than as agricultural land.</p> <p>Land on the plateau around Heritage Farm and junction of the A1071 and B1113 has some scope for employment development associated with road infrastructure although it is separated from Ipswich by the A14 and isolated from other settlement within the Parish. The relatively flat topography would in combination with new woodland planting help to mitigate new development so long as it was set back away from the upper valley slopes.</p>
Environmental Opportunities	<p>Opportunities for landscape enhancement of the river valley reinforcing its role as a recreational and ecological corridor linking along the River Gipping and under the A14 to connect with steam valleys associated with Sproughton.</p> <p>There is scope for the retention of the rural valley sides which form the setting to Ipswich with improved wildlife and recreation corridors.</p> <p>New woodland planting on the upper valley slopes and on the plateau around Hermitage Farm would enhance the characteristic wooded skylines and frame the valley, screening existing and new development which is located on the plateau or lip of the valley. Planting on the upper slopes of the valley sides will help to define and emphasise the valley landform and mitigate visual and noise intrusion from the A14 and edge of Ipswich.</p>

Appendix B

Extract from Landscape Sensitivity Assessment
of SHELAA Sites (Land Use Consultants, September 2020)

Site Name: Sproughton Parish - SS0191, SS0954, SS1024

Main SS ID: SS0191

LA/LS ID: SS0191 - LA013
SS0954 - LA013
SS1024 - LA013

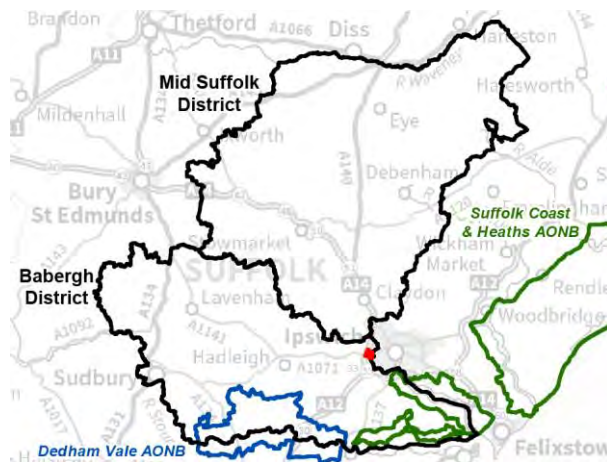
Type: SS0191 - Residential
SS0954 - Residential
SS1024 - Residential

Parish: Sproughton

District: Babergh



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Landscape Criteria

Physical and natural character

Moderate

An undulating landscape between 20-40m AOD formed of large arable fields. There are no recorded priority habitats within the sites, however there are mature trees lining the roads and some hedgerow trees. Hedgerows are fragmented, reinforced by post and rail fencing in some places and lost elsewhere.

Settlement form and edge

Moderate

The sites are over 300m south of Sproughton, separated by the A14, and have no relationship with the village. SS0191 in the south is adjacent to the settlement edge of Ipswich, which is defined by the A1214 London Road dual carriage way and is open and exposed. The undulating landform within these sites is distinct from that of Ipswich, and development on these sites would be considered further linear ribbon development along the A1214 London Road, although would have a strong connection with Ipswich. New development is being built on the other side of the A14, and although there would be intervisibility between these sites and the new development there would be no relationship due to separation by the A14.

Settlement setting

Moderate

The sites contribute to the sense of separation between the urban edge of Ipswich and the village of Sproughton. They also contribute to the wider rural setting of the settlements.

Views

Moderate

This is a largely open landscape, although the undulating landform provides some enclosure. A number of rights of way cross these sites, enabling views across the landscape. There are views across the sites from the A1214, A1071, Hadleigh Road and Church Lane, and from the development along these roads.

Perceptual qualities

Moderate

This is an open agricultural landscape impacted by the road network and settlement on the edge of Ipswich.

Cultural and historical associations

Moderate

There are no recorded heritage assets within these sites. The field pattern was formed by pre- and post-18th century enclosure, however much of this pattern has been lost. Grade II listed Chantry Park Registered Park and Garden lies to the east of SS0191. Grade II listed Springvale lies between SS0954 and SS1024, and Grade II listed Red House and its barn lie between SS1024 and SS0191. These sites provide a rural setting to these nationally important landscapes and buildings.

Overall Landscape Sensitivity - Residential development

Moderate

SS0191, SS0954 and SS1024 are combined to make LA013.

These sites are assessed as having moderate sensitivity to residential development due to the undulating agricultural character, close proximity to heritage assets, and strong connection to Ipswich. The road network and lack of semi-natural features reduce sensitivity.

APPENDIX THREE – CULTURAL HERITAGE RESPONSE

Date: 2nd February 2023

Bethan Haigh
Boyer
Third Floor, Park House
Greyfriars Road
Cardiff
CF10 3AF

By email only

Dear Bethan,

Cultural Heritage Response Note Regulation 16 Submission Consultation of the Sproughton Neighbourhood Development Plan

1 Introduction

- 1.1 This Cultural Heritage Response Note has been prepared by RPS Consulting Services Ltd in response to the Regulation 16 Submission Consultation of the Sproughton Neighbourhood Development Plan.
- 1.2 The Sproughton Neighbourhood Development Plan (NDP) is being prepared by Sproughton Parish Council and other stakeholders. When adopted the NDP will inform future development within the area. This Cultural Heritage Response Note provides commentary on the draft NDP and supporting documents.
- 1.3 This response note also summarises the Cultural Heritage assessment undertaken to support an application for outline planning consent ref. DC/21/02671 (“the Application”) in respect of:
Erection of up to 750 No dwellings, and up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements, on Land North Of The A1071, Ipswich (Wolsey Grange)
- 1.4 This response note sets out the relevant points made by the Local Planning Authority’s (LPA’s) Heritage Advisors (Place Services) regarding potential built heritage impacts arising from the Application and provides a discussion of these comments. This response note considers the extent to which the conclusions of the submitted Cultural Heritage assessments provided as part the Application remain valid in the context of the draft NDP and Place Services Consultee response.
- 1.5 This assessment relates to Cultural Heritage matters only, a separate detailed response letter will be provided in respect of landscape value and landscape visual impact matters. Please refer to the accompanying Planning Statement for discussion of the public benefits of the proposed development.

Discussion: Regulation 16 Neighbourhood Development Plan

- 1.6 The Sproughton NDP was submitted in November 2022 and has now been approved for publication and subsequent examination. Written comments are being invited on this Plan and accompanying documents in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations, 2012 (as amended).
- 1.7 This section discusses the available NDP documents in respect of Cultural Heritage matters.

Submission Draft: Sproughton NDP 2018 – 2037

- 1.8 The Submission Draft NDP contains the following objectives and policies relevant to Cultural Heritage.

Objectives

8 To conserve and enhance the heritage assets and their settings.

9 To protect and improve the features which contribute to the historic character of the parish.

POLICY SPTN 13 – Heritage Assets

To ensure the conservation and enhancement of the parish heritage assets, proposals must:

a. preserve and enhance the significance of the designated heritage assets of the parish, their setting and the wider built environment

b. retain buildings and spaces, the loss of which would cause harm to the character or appearance of the parish including

i. Areas of Distinctive Character

ii. Valued landscape areas c. contribute to the parish's local distinctiveness, built form and scale of its heritage assets, through the use of appropriate design and materials

d. be of an appropriate scale, form, height, massing, alignment and detailed design which respects the area's character, appearance and setting, in line with the AECOM Design Guidance and Codes for Sproughton

e. demonstrate a clear understanding of the significance of the asset and the wider context in which the heritage asset sits, alongside an assessment of the potential impact of the development on the heritage asset and its context

f. provide clear and convincing justification, through the submission of a heritage statement, for any works that would lead to harm to a heritage asset and yet be of wider substantial benefit.

Where a planning proposal affects a heritage asset, it must be accompanied by a Heritage Statement identifying, as a minimum, the significance of the asset, and an assessment of the impact of the proposal on the heritage asset. The level of detail of the Heritage Statement should be proportionate to the importance of the asset, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting.

- 1.9 Additionally, Policy SPTN 16 – Development Design Considerations states that, as appropriate to the proposal, they:

c. taking mitigation measures into account, do not affect adversely:

i. any historic character, architectural or archaeological heritage assets of the site and its surroundings

- 1.10 The provisions of the NPD Objectives 8 and 9 and Policies SPTN 13 and SPTN 16 are considered to be typical local policy responses to support the delivery of appropriate change within the historic environment. No commentary is offered in respect of these NDP objectives or policies.

Sproughton NDP 2018 – 2037 Supporting Documents Discussion

- 1.11 The Sproughton NPD is supported by *Historic Environment Concept Statement: JLP Allocation Sites, LUC, August 2021*. This document was commissioned to aid the sustainable delivery of a number of draft allocation sites, though progress on draft allocation has now been placed on hold.

- 1.12 Drawing on the *Heritage Impact Assessment* (LUC, 2020), *The Historic Environment Concept Statement* identified the Application (ref.DC/21/02671) as forming part of potential draft allocation Site LA013: Sproughton, with the following Cultural Heritage sensitivities:

- Archaeological remains of Harland Park and House (SHER ref: MSF39761).
- Prehistoric, Saxon, Medieval and other archaeological evidence.

- Possible presence of hedgerows qualifying as historically 'important' under the 1997 Hedgerow Regulations because they date to before 1845.
 - Possible loss of a historic pathway.
 - Setting change to Chantry Park, Grade II and conservation area.
 - Setting Change to Red House, Grade II.
 - Setting change to Grade II Barn 20m to south east of Red House.
- 1.13 No Cultural Heritage sensitivities that would preclude the development of the Site are identified by this document.
- 1.14 In addition, the *Historic Environment Concept Statement* sets out a number of design principles to guide development of the Site. The submitted proposed development includes significant embedded design measures and has evolved prior to submission to respond to the context of the Site and its relationship with the relevant built heritage assets. The proposed development seeks to preserve important views, reflect locally established patterns of scale, massing and density. Landscaping measures are proposed across the Site to enhance and establish suitable planted boundaries, formed of native species. Generous provision has also been made for public open space, including managed pasture reflecting the semi-rural character of the area and importance of the listed Red House and its associated listed Barn.
- 1.15 In the context of the *Historic Environment Concept Statement*, the conclusions of the submitted Built Heritage Statement (CgMs/RPS, 2021) are considered to remain valid.

Cultural Heritage Assessment Summary

Archaeology

- 1.16 An Archaeological Desk Based Assessment (CgMs, 2018) and geophysical survey (Sumo Geophysics, 2018) were undertaken in accordance with relevant local and national policy and guidance, following which, preliminary trial trenching was carried out in the northern, south-western, and south-eastern areas of the Site (RPS, 2019).
- 1.17 The archaeological evaluation identified archaeological features of predominately Roman date, likely to represent occupation, and evidence of low-level Anglo-Saxon and medieval activity. As a result, there is high potential for the discovery of further archaeological evidence within the Site, and groundworks associated with the development have the potential to damage or destroy any such archaeological remains which exist.
- 1.18 Suffolk County Council Archaeological Service (27-05-2021, ref.2021_02671) have confirmed that on the basis of past archaeological investigation, there are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework, any permission granted should be subject to a suitable archaeological planning condition.
- 1.19 Given the agreement that any further archaeological work required by the Local Planning Authority and their archaeological advisors can be secured by an archaeological planning condition, attached to the granting of consent, no further discussion of archaeological matters is given in this response letter.

Built Heritage

- 1.20 A comprehensive Built Heritage Statement (CgMs/RPS, April 2021) was carried out to identify relevant built heritage assets and assess their significance, including the contribution of their setting to that significance, and to identify potential impacts arising from the proposed development. The submitted Built Heritage Statement was sufficient in respect of the requirements of the NPPF (2019 version) and was undertaken in accordance with the five step assessment process set out in *Historic England's GPA3: The Setting of Heritage Assets* (Dec. 2017).
- 1.21 The submitted Built Heritage Statement was informed by desk based and archival sources, the Suffolk Historic Environment Record, Site visits and area walkovers and included discussion of 'verified view' Accurate Visual Representations.

1.22 During the process of preparing the submitted Built Heritage Statement, very extensive consultation and joint Site visits were carried out with the Local Planning Authority’s Built Heritage advisors, Place Services. One such site visit was carried out in June 2021 with Laura Johnson, who provided the Place Services Consultee response discussed below.

1.23 The submitted Built Heritage Statement concluded that:

A degree of less than substantial harm is identified as arising to the significance of the Grade II Red House and its associated Grade II Barn, through erosion of their historic agricultural landscape setting. The degree of harm identified is at the lower end of the spectrum of less than substantial harm. In accordance with paragraph 196 of the NPPF, this less than substantial harm should be weighed against the wider public benefits provided by the development.

The proposed development represents a neutral alteration of the unappreciable wider agricultural setting of the Springvale building (Grade II) and the Grade II registered Chantry Park, within which The Chantry and the Gatehouse and Gate Piers are separately statutorily listed at Grade II. The Chantry Park group and Springvale listed buildings are enclosed within their own settings, to which alteration in the form of residential led development of the Site represents a neutral impact on their significance and the experience of their architectural and historic interest.

The proposed development is considered to represent a proportionate and appropriate built expansion of the north western fringe of Ipswich.

Discussion of Built Heritage Consultee Response

1.24 The Local Planning Authority’s Built Heritage advisors, Place Services, issued a consultee response to the Application, dated 7th June 2021.

1.25 The Place Services response makes the following key points in respect of potential impacts to the significance of relevant Built Heritage Assets, these relevant assets comprise.

- Poplar Farmhouse, Grade II listed (NHLE ref.1193985);
- Springvale, Grade II listed (NHLE ref.1193916);
- Chantry Park Registered Park and Garden, Grade II listed (NHLE ref.1000271);
- The Chantry, Grade II listed (NHLE ref.1037783);
- Gatehouse and entrance piers to Chantry House, Grade II listed (NHLE ref.1236640); and
- Red House, Grade II listed (1285933) and associated barn, also Grade II listed (NHLE ref.1036924).

1.26 No non-designated built heritage assets have been identified as being relevant to the proposed development.

1.27 Place Services identify various impacts to the significance of the relevant built heritage assets, arising through the alteration of their setting only.

1.28 The following table sets out the Built Heritage impacts identified by Place Services and those impacts identified in the submitted Built Heritage Statement.

Table 1: Comparison of Identified Built Heritage Impacts.		
Built Heritage Asset	Impact Identified by Place Services	Impact Identified in Submitted Built Heritage Statement
Poplar Farmhouse, Grade II listed (NHLE ref.1193985)	No Harm	Discounted from full assessment No potential harm
Springvale, Grade II listed (NHLE ref.1193916)	Low level of less than substantial harm.	No Harm
Chantry Park Registered Park and Garden, Grade II listed (NHLE ref.1000271)	Less than substantial harm, in the middle of the scale	No Harm

The Chantry, Grade II listed (NHLE ref.1037783)	No Harm	No Harm
Gatehouse and entrance piers to Chantry House, Grade II listed (NHLE ref.1236640)	No Harm	No Harm
Red House, Grade II listed (1285933)	Less than substantial, at the middle to high end of the scale	Lower end of the spectrum of less than substantial harm
Red House Barn, Grade II listed (NHLE ref.1036924)	Less than substantial, at the middle to high end of the scale	Lower end of the spectrum of less than substantial harm

1.29 No further discussion is given in respect of heritage assets identified by both Place Services and the submitted Built Heritage Statement as undergoing no harm to their significance as a result of the proposed development.

1.30 Harm to the significance of designated heritage assets, such as listed buildings and registered parks and gardens, is quantified in Chapter 16 of the 2021 NPPF using a spectrum of *less than substantial* and *substantial* harm. Significance is defined in the NPPF as:

The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

1.31 Additionally, The NPPF and Historic England's guidance is clear that harm does not occur to the setting of an asset, but to its significance, a setting may only undergo a change. Historic England's *GPA3: The Setting of Heritage Assets* (Dec. 2017) provides the following clarification of the relationship of setting to heritage assets:

Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.

1.32 Setting is defined in the NPPF as:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

1.33 The difference in the conclusions regarding heritage impacts between the Place Services Consultee Response and the submitted Built Heritage Statement are considered to represent relatively limited differences of professional opinion. Critically, where harm is identified to the significance of a relevant heritage asset by Place Services and the submitted Built Heritage Statement, this harm is considered to be less than substantial. As such, paragraphs 200 and 202 of the NPPF (2021) are engaged.

1.34 Place services identify the relevance of NPPF Paragraph 200, which simply requires that any (even the lowest levels of harm) to a designated heritage asset requires *clear and convincing justification*. In this instance, the less than substantial harm identified in respect of four designated heritage assets by Place Services, is considered to represent an unavoidable heritage impact incurred by delivery of a major development scheme.

1.35 The Place Services Consultee Response states that they are unable to support the proposals. However, this position is adopted however without any reference to NPPF Paragraph 202. This paragraph states that:

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...

- 1.36 The identification of less than substantial harm in respect of some of the designated heritage assets in the vicinity of the Site is therefore not the sole factor in determining the suitability of the proposals. In accordance with Paragraph 202, the public benefits of the proposals (set out elsewhere in supporting planning documentation), must be weighed by decision makers against the less than substantial adverse impacts to the significance of some relevant heritage assets. This planning balance should also take account of the high quality of the proposals, the embedded design mitigation measures and the potential to further reduce potential heritage impacts through future full and reserved matters applications, and the use of suitable planning conditions

Conclusions

- 1.37 The Regulation 16 Sproughton Neighbourhood Plan 2018-2037 and its supporting documentation has been reviewed in respect of Cultural Heritage matters. No policies or information issued for consultation is considered to suggest that Cultural Heritage specific sensitivities would preclude the suitability of the Site for the proposed development.
- 1.38 A proposal for the development of up to 750 No dwellings, and up to 3ha of primary education land, public open space, Sustainable Drainage Systems (SuDS), landscaping and highway improvements, on Land North of The A1071, Ipswich (Wolsey Grange) has been submitted to Babergh District Council (ref. DC/21/02671).
- 1.39 The Application was supported by comprehensive Built Heritage and Archaeological Assessment.
- 1.40 The submitted Built Heritage Statement (CgMs/RPS, April 2021) identifies less than substantial harm to three Grade II designated built heritage assets in the vicinity of the Study Site. The Place Services Consultee response identifies less than substantial harm to four Grade II designated heritage assets, ranging from low to high on the spectrum of less than substantial harm.
- 1.41 While the proposals represent a notable change to the character of the Site, the resulting change to the setting of relevant heritage assets is necessary to deliver a substantial, high quality development.
- 1.42 The submitted assessments are considered to remain valid in the context of the Consultee Response issued by Place Services (dated 7th June 2021) and the Regulation 16 Sproughton Neighbourhood Plan 2018-2037, which has been issued for consultation.
- 1.43 The proposed development is considered to represent a proportionate and appropriate built expansion of the north western fringe of Ipswich.
- 1.44 Paragraphs 200 and 202 of the NPPF (2021) are engaged in this instance. Paragraph 200 requires that any harm to a designated heritage asset requires clear and convincing justification. Paragraph 202 requires that less than substantial harm to heritage asset be weighed against the public benefits of the proposed development. The justifications and public benefits of the proposed development are set out in detail in the accompanying Planning Statement. A separate, detailed Landscape Value and Landscape Visual Impact response has also been submitted alongside this Cultural Heritage Response Letter.

Yours sincerely,

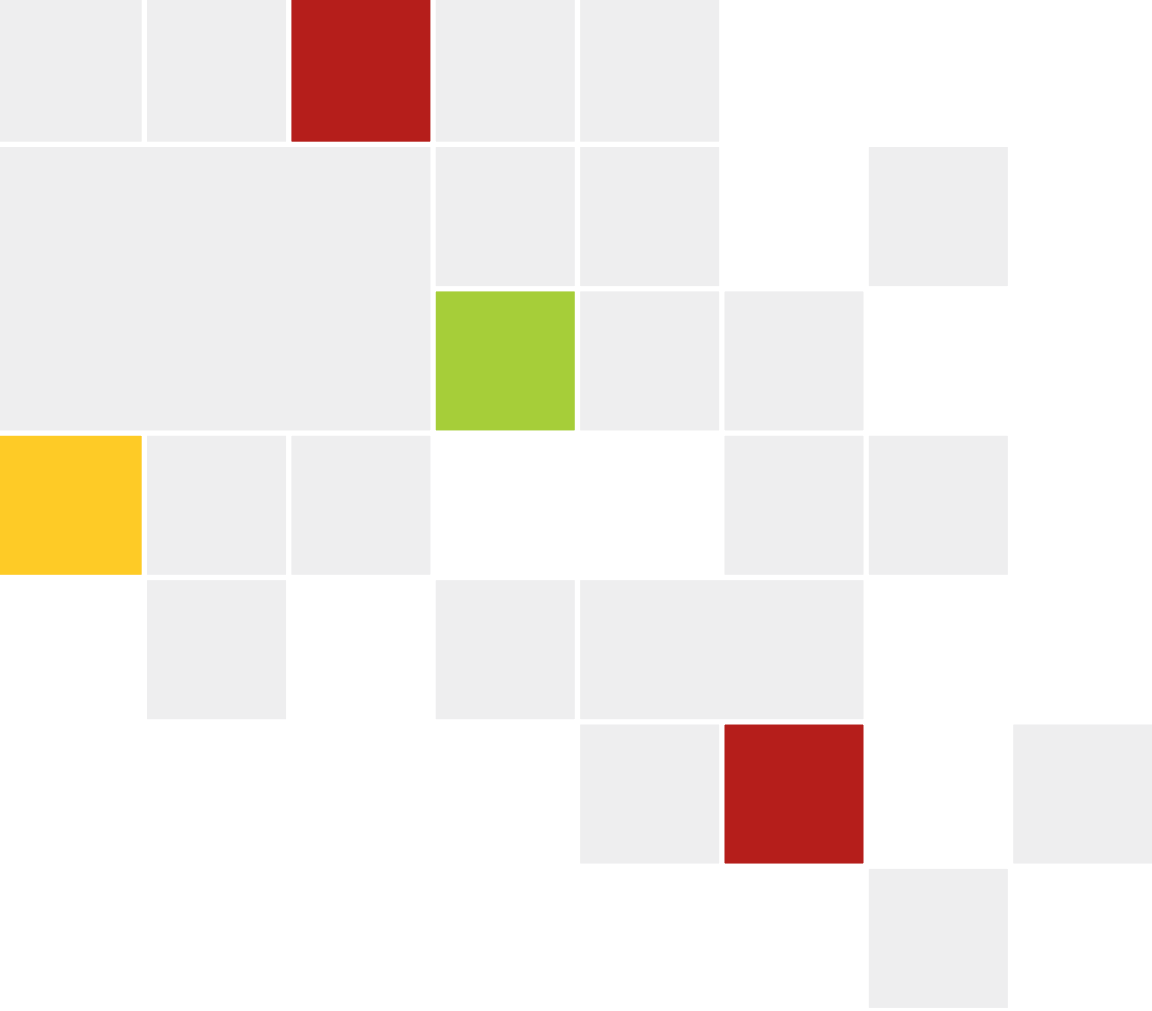


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(12) PIGEON INVESTMENT MANAGEMENT



03 February 2022

Sproughton NP Consultation, c/o Spatial Planning Policy Team
Babergh & Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

SENT VIA EMAIL TO: communityplanning@babberghmidsuffolk.gov.uk

Dear Sirs

**SPROUGHTON NEIGHBOURHOOD PLAN
REGULATION 16 SUBMISSION CONSULTATION, DECEMBER 2022
RESPONSE ON BEHALF OF PIGEON AND THE FELIX THORNLEY COBBOLD AGRICULTURAL TRUST**

Thank you for consulting Pigeon Investment Management Ltd ('Pigeon') and the Felix-Thornley Cobbold Agricultural Trust ('the Trust') on the Regulation 16 Sproughton Neighbourhood Plan ('the SNP'). We very much welcome the opportunity to participate in the current Regulation 16 consultation.

Pigeon is a privately owned company based in the Eastern Region, which specialises in high quality, landscape and design led sustainable development. As such, we support Neighbourhood Planning and the role that it can play in delivering a long-lasting positive contribution to local communities.

The following comments are provided in the interests of ongoing and future collaborative working between Pigeon, the Trust and Sproughton Parish Council and Babergh District Council, and are intended to assist the Independent Examiner in the examination of the SNP.

In the event that the Independent Examiner concludes that it is necessary to hold a public hearing then we wish to reserve the right to participate in the relevant hearing sessions so that we may expand upon the matters raised within our representation.

If in the meantime, it would assist either Babergh District Council, Sproughton Parish Council, or the SNP Steering Group to discuss the matters raised in this representation, then we would be happy to do so.

PLANNING POLICY CONTEXT

The SNP correctly identifies that the development plan consists of the adopted Core Strategy and the 'saved policies' of the 2006 Babergh Local Plan. However, the SNP notes that the current strategic planning framework for Sproughton is likely to be replaced by the emerging Joint Local Plan (JLP) in the near future.

The SNP refers to the fact that in December 2021 the Planning Inspectors for the JLP recommended that the JLP should be modified, amongst other things to exclude housing site allocations, the

proposed settlement boundaries and the proposed distribution of housing growth across the district, and that those matters would be addressed in a new Part 2 JLP to be prepared following the Part 1 JLP, which will identify the level of housing growth and contain development management policies.

The SNP goes on to state at paragraph 3.7 that *“Given the decision to defer the designation of new Settlement Boundaries to Part 2 of the Joint Local Plan, areas included within the Settlement Boundary of the submitted Joint Local Plan which did not have planning consent will now be removed from the Settlement Boundaries until site allocations are confirmed in Part 2”*.

However, this approach results in a situation where the Settlement Boundaries are drawn tightly around the existing built-up area of the village, existing homes on Hadleigh Road, the employment areas on Sproughton Road and new homes already under construction at Wolsey Grange. As a result, the SNP does not provide for growth and would appear to be at odds with the Vision and Objectives section of the SNP (i.e. balancing the provision of housing growth with need), as well as a number of the individual draft SNP policies, as detailed in the following sections.

VISION AND OBJECTIVES

The SNP sets out a Vision that in 2037 Sproughton will be a thriving, safe parish that will have balanced the provision of housing growth with the need to maintain and enhance its character, historic landscape and environment.

Objective 1 is to *“To maintain a strong community by ensuring an adequate supply and mix of housing types”*.

Objective 2 is to *“To enable local people to stay in or return to the village throughout their lifetime and as their needs change”*.

However, as set out above, the approach being adopted within the SNP does not allow for future growth and it is therefore difficult to see how the SNP will meet the Vision and Objectives that seek to ensure an adequate supply and mix of housing and to enable local people to stay or return to the village throughout their lifetime.

In particular, the SNP does not make any provision to meet affordable housing needs, which are identified as 84 affordable homes in the AECOM Housing Needs Assessment that forms part of the SNP evidence base.

In light of the SNP objectives and identified affordable housing needs, we consider that a more ambitious approach is required within the SNP that plans for the future needs of the village in order to achieve the Vision and Objectives set out in Section 4 of the SNP.

POLICY SPTN 1 - SPATIAL STRATEGY

Paragraph 5.3 of the SNP states that, in accordance with Policy SP03 of the emerging JLP, the principle of development within defined settlement boundaries will be supported. This approach is reflected in SNP draft Policy SPTN 1, which refers to the Settlement Boundaries, as defined on the Policies Map.

Whilst not reflected in the policy text, paragraph 5.3 goes on to state that outside the settlement boundaries, development will not normally be permitted unless there are ‘exceptional circumstances’, “as defined by the JLP and the National Planning Policy Framework (NPPF)”.

The term ‘exceptional circumstances’ appears to have been taken from the Submitted Version of the JLP, where at Policy SP03 it stated in Part 2 that “outside of the defined settlement boundaries, in isolated locations development will only be permitted in exceptional circumstances”.

However, through the hearing sessions for the examination of the JLP, the Councils have proposed a main modification to Policy SP03. This is in light of guidance from the Inspectors who questioned whether such a requirement was in compliance with national planning policy. On reflection, the Councils have considered this further and proposed a modification to the Inspectors, which will be consulted upon at a later date. The proposed modification is that “*outside of defined development boundaries, development will only be permitted in circumstances specified in national policy*”.

As such, Paragraph 5.3 should be amended to remove any reference to exceptional circumstances and should simply refer to proposals that are in accordance with national and district level policies (as per the draft policy text above).

Policy SPTN 1 itself states that “*Settlement boundaries, as defined on the Policies Map, identify the extent of land which is required to meet the development needs of the Parish*”. However, as detailed above the settlement boundaries do not allow for growth and the SNP does not identify how the SNP will meet the development needs of the parish (including the requirement for 84 affordable homes). There is therefore a clear tension between Policy SPTN1, which does not provide for growth and the SNP’s Vision and Objectives, which seek to ensure an adequate supply and mix of homes over the SNP plan period.

POLICY SPTN 2 - HOUSING

Policy SPTN 2 (Housing Mix) states that there shall be an emphasis on providing a higher proportion of three-bedroomed homes within all schemes of ten or more homes. Whilst this reflects the housing need survey carried as part of the SNP preparation, this represents a snap-shot in time and implies that there is little or no requirement for 4+ bedroom homes. We would query whether this is appropriate given that it will limit the choice of housing for those already living in the village, whose needs may change over the SNP plan period and may require 4+ bedroom homes in the future (as per Objective 2, *to enable local people to stay in or return to the village throughout their lifetime and as their needs change*).

In addition, there may be a requirement for 4+ bedroom homes to meet affordable housing needs arising in the wider housing market area as well as different types of housing, such as self and custom build housing, which are more likely to give rise to a need for 4+ bedroom homes. We suggest that the policy is amended to reflect these different requirements so that it provides for the full range and type of new homes that may be required during the life of the SNP.

In addition, we would suggest that the word “small” is omitted from Policy SPTN 2 in the context of clusters of affordable housing. Whilst it is appropriate to distribute affordable housing around larger sites to ensure the delivery of mixed and balanced communities, imposing a restriction on affordable housing cluster sizes may compromise the design of a scheme. Furthermore, it may also compromise

the ability of a Registered Provider to manage the affordable homes effectively, potentially prejudicing the delivery of much needed affordable housing. We consider that these issues can be avoided by removing reference to “small” and simply referring to clusters of affordable housing. In any event, Babergh and Mid Suffolk Councils already seek to ensure that affordable housing is not placed in groups of more than 15 homes.

The supporting text for Policy SPTN 2 identifies a demand for bungalows (Paragraph 6.12), as well as affordable homes, starter homes and retirement homes with 63%, 62% and 56% of respondents to the SNP Household Survey respectively identifying a requirement for these types of accommodation. However, the Plan as currently drafted does not make provision for these types of homes and will not meet these requirements over the SNP plan period. We therefore consider that a more ambitious approach is required, particularly in light of the requirement for 84 affordable homes, and we would suggest the inclusion of a criteria based policy that supports proposals that will help to provide for these types of accommodation in sustainable locations adjacent to or within close proximity to the defined Settlement Boundaries.

NATURAL ENVIRONMENT

Paragraph 8.9 of the SNP refers to the existence of “*four landscape corridors detailed in the Neighbourhood Plan Landscape Appraisal*”, including ‘The Grindle’. While the Grindle is identified in the SNP Landscape Appraisal Final Report (Alison Farmer Associates, 2021) as an important element “*contributing to a local sense of place*”, there is no evidence that this corridor extends beyond the Grindle, which is a narrow lane extending from Loraine Way towards Grindle Farm. However, Map 3 shows an “*Important Landscape Corridor*” extending south of the Grindle, beyond its physical extent. The diagram included as Map 3 is therefore misleading and should be revised to identify the physical extent of The Grindle only and to follow its physical alignment.

POLICY SPTN 8 - SETTLEMENT GAPS

Policy SPTN 8 (Settlement Gaps) seeks to prevent coalescence and retain the separate identity of “*the settlements*”. While the supporting text for this policy (paragraph 8.11) refers to preventing coalescence of the parish with the urban area of Ipswich and the villages of Bramford, Burstall and Copdock and Washbrook, the ‘settlement gaps’ as currently identified on the policies map do not reflect the SNP evidence base. The SNP Landscape Appraisal Final Report (Alison Farmer Associates, 2021) identifies an area to the northeast of the village where an “*open gap is important*”. This area is illustrated on Figure 4 of the Alison Farmer Landscape Appraisal, where it is clearly shown extending to the northeast of village (east of Loraine Way).

The Settlement gaps as depicted within the SNP at Map 6 do not reflect the Alison Farmer Landscape Appraisal and are supported by evidence.

Notwithstanding the restrictions on development that the SNP seeks to impose via Policy SPTN 1 and the lack of evidence to support the gaps as depicted on Map 6, development within the majority of the ‘settlement gaps’ as shown on Map 6 would not result in coalescence of Sproughton with neighbouring settlements. Indeed there is a direct comparison between the gaps as depicted on Map 6 and the proposed Rural Gap policy contained in the draft Long Melford Plan, which the Examiner concluded that the policy related more to the containment, rather than protecting the setting of the settlement (Long Melford Neighbourhood Plan Independent Examiner’s Report, 13 May 2022).

Policy SPTN 8 should either be deleted entirely, or the settlement gaps (as shown on Map 6) should be revised to reflect Figure 4 of the SNP Landscape Appraisal.

POLICY SPTN 9 - PROTECTION OF IMPORTANT VIEWS

Policy SPTN 9 states that “important” views from public vantage points including those identified on Map 5, shall be “maintained”. We would suggest that the requirement to “maintain” views is inappropriate. This suggests that any change to an existing view is unacceptable, effectively creating a presumption against all development. Instead, the policy should be modified to require an assessment of the impact of proposals on views from public vantage points, **“taking into account any mitigation that is proposed as part of the scheme”**. This approach will ensure that the key features of “important views” are preserved, whilst not preventing development where it is consistent with development plan policies and policies set out in national policy.

While the supporting text for Policy SPTN 9 refers to the appraisal of views that has been undertaken as part of the Neighbourhood Plan Landscape Appraisal, the “important views” identified on Map 7 are not referenced and it is therefore unclear whether they relate to the views identified in section 4.4 of the Alison Farmer Landscape Appraisal Final Report. The views should be numbered within the SNP and should refer back to the descriptions and supporting text within section 4.4. of the Landscape Appraisal Final Report. In the absence of this information, it is not possible to determine whether all of the views shown on Map 7 are justified.

The second part of Policy SPTN 9 requires proposals for new buildings outside the Settlement Boundaries to be accompanied by an LVIA that demonstrates how the proposal will “*protect the key features of the important views*”. It is therefore important that the individual views shown on Map 7 are clearly identified together with any key features that have influenced their identification in order to enable this policy requirement to be assessed objectively.

POLICY SPTN 12 – RECREATIONAL DISTURBANCE AVOIDANCE AND MITIGATION

Policy SPTN 12 requires large residential developments (defined as 50 or more homes) to provide Suitable Alternative Natural Greenspace (SANG). This requirement is in addition to the requirement to make a financial contribution as per the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy. Not only is it unclear why the 50 dwelling threshold has been chosen but the policy fails to follow the stages that are required as part of Habitats Regulations Assessment (HRA), namely the ‘test of likely significant effect’ or ‘screening’ stage, and the Appropriate Assessment stage where it is considered whether there is likely to be an effect on site integrity. The draft policy effectively assumes that proposals will result in likely significant effects (either alone or in combination), requiring SANG for all developments over 50 homes.

The Policy as currently drafted is inconsistent with the relevant HRA legislation, namely the Conservation of Habitats and Species Regulations 2017 and should be revised to remove the requirement for SANG, or only require SANG where it is required to mitigate adverse effects on the integrity of European sites.

POLICY SPTN 13 - HISTORIC ENVIRONMENT

Policy SPTN 13 (Heritage Assets) states that “*all proposals must preserve or enhance the significance of the designated heritage assets of the parish; their setting and the wider built environment*”. The language used within the Policy is inconsistent with the National Planning Policy Framework.

Paragraph 202 of the NPPF states that where a development proposal will lead to “less than substantial harm” to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. As such, a proposal that results in harm to a designated heritage asset may be acceptable in some circumstances. By requiring all proposals to preserve or enhance the significance of the heritage assets of the parish, Policy SPTN13 is inconsistent with the NPPF. The policy should be amended so that it is consistent with national planning policy.

POLICY SPTN 16 – DEVELOPMENT DESIGN CONSIDERATIONS

Policy SPTN 16 states that proposals will be supported where they do not adversely affect “any historic character, architectural or archaeological heritage assets of the site and its surroundings” (part c.(i) of the policy). As per our comments in respect of Policy SPTN 13 above, is inconsistent with NPPF Paragraph 202 which states that where a development proposal will lead to “less than substantial harm” to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. Policy SPTN 6 should be modified so that it is consistent with the NPPF.

SUMMARY

We have identified a number of modifications to the SNP that are required to ensure that it is consistent with national policy. In addition, the SNP does not include policies that will meet the Vision and Objectives set out within the Plan and we would advocate a more ambitious approach that plans for the future needs of the village in order to achieve the Vision and Objectives set out in Section 4 of the SNP.

We trust that the above will assist the Independent Examiner in their assessment of the WNP. In the event that the Independent Examiner concludes that it is necessary to hold a public hearing then we wish to reserve the right to participate in the relevant hearing sessions so that we may expand upon the matters raised above.

If in the meantime, it would assist either Sproughton Parish Council, the SNP Steering Group or Babergh District Council to discuss the matters raised in this representation, then we would be happy to do so.

Yours faithfully



Rob Snowling MRTPI
Associate Director