



Redgrave Neighbourhood Plan **Basic Conditions Statement** May 2021

To accompany Neighbourhood Plan Submission draft for Examination

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1. Introduction

- 1.1 When submitting a Neighbourhood Plan to the Local Authority (in this case Mid Suffolk District Council), it is a requirement that the Plan be accompanied by a number of supporting documents. One of these is commonly referred to as the 'Basic Conditions Statement'. Only a Neighbourhood Plan that meets each of the basic conditions can be put to referendum and if successful, be used to assist in the determination of planning applications.
- 1.2 This Basic Conditions Statement is prepared for use by Mid Suffolk District Council and the Independent Planning Examiner, to assist in making this assessment about the basic conditions.

2. Legal Requirements

Legal Requirements: The Neighbourhood Plan is compliant with The Planning and Compulsory Purchase Act 2004 38A (1) & (2) and 38B (a)-(c).

Qualifying Body: The Redgrave Neighbourhood Development Plan being submitted by a qualifying body – Redgrave Parish Council. Redgrave Parish Council was confirmed as a qualifying body by Mid Suffolk District Council on 20th December 2018 when the Redgrave Neighbourhood Plan Area was designated.

A Neighbourhood Development Plan: The Redgrave Neighbourhood Development Plan is a neighbourhood development plan. It relates to planning matters (the use and development of land) and has been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012.

The time-period covered: The Redgrave Neighbourhood Plan states the time-period for which it is to have effect (from 2018-2037) a period of 19-years.

Excluded Development: The Redgrave Neighbourhood Development Plan policies do not relate to excluded development. The Redgrave Neighbourhood Development Plan does not deal with County Matters (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990.

Area of the Neighbourhood Plan: The Redgrave Neighbourhood Development Plan relates to the Redgrave Parish Council's Neighbourhood Area and to no other area. There are no other Neighbourhood Plans in place relating to that Neighbourhood Area.

3. Basic Conditions

- 3.1 Paragraph 8(2) of Schedule 4B in the Town and Country Planning Act 1990 (as amended by Schedule 10 of the Localism Act 2011) sets out a series of requirements that Neighbourhood Plans must meet. These ‘basic conditions’ are set out below:
- 3.2 A draft Plan meets the basic conditions if –
- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan (see below).
 - (b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order (applies in relation to a Listed Building only insofar as the order grants planning permission for development that affects the building or its setting (not applicable in respect of the Redgrave Neighbourhood Plan)).
 - (c) Having special regard to the desirability of preserving or enhancing the character or appearance of the Conservation Area it is appropriate to make the order (applies in relation to Conservation Areas only) insofar as the order grants planning permission for development in relation to buildings or land in the area (not applicable in respect of the Redgrave Neighbourhood Development Plan)
 - (d) The making of the Plan contributes to the achievement of sustainable development (see below)
 - (e) The making of the 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). (see below)
 - (f) The making of the Plan does not breach and is otherwise compatible with EU obligations (see below) and,
 - (g) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with, in connection with the proposal for the plan (see below)
- 3.3 Where applicable, each of these basic conditions is addressed below. For clarification it should be noted that b) and c) above are not applicable to the Redgrave Neighbourhood Development Plan and refer to ‘Neighbourhood Orders’ only.

3.a) Having regard to National Policies and Advice and e) Conformity with Strategic policies in the Development Plan

- 4.1 The following table provides an appraisal of the extent to which the Redgrave Neighbourhood Plan has regard to national policy and is in general conformity with strategic local policy.
- 4.2 The Neighbourhood Plan policies were drafted to be in conformity with the National Planning Policy Framework published in February 2019. The table below assesses the degree of regard that the Redgrave Neighbourhood Development Plan policies have had to NPPF 2019 (Column B)
- 4.3 During the production of the Neighbourhood Plan, the strategic policies for the area were under-going revision. The Mid Suffolk Core Strategy was adopted in 2008. (Column C). A focussed review of the Core Strategy was completed in 2012 (Column D), which replaced a number of policies from the Core Strategy 2008, but largely only those around housing. The 2008 Core Strategy replaced parts of the Mid Suffolk Local Plan 1998, but not all and therefore the Redgrave Neighbourhood Plan has been assessed against the remaining Saved Policies from the previous Local Plan (Column E which itself was modified by the First Alteration completed in 2006 (Column F)
- 4.4 The Pre-Submission Version of the BMSJLP was published for public consultation on 12th November 2020. The previous version of the BMSJLP, the Preferred Options Reg18 Version was consulted on between July and September 2019 and the Regulation 14 Version of the Redgrave Neighbourhood Plan was prepared using it as the strategic context. Prior to that, issues and options consultation had taken place between August 2017 and November 2017.
- 4.5 Therefore, the Policies contained within the Redgrave Neighbourhood Plan have been assessed for their conformity against the existing Development Plan – the Mid Suffolk Core Strategy 2008 (Column C), the Mid Suffolk Core Strategy Focussed Review 2012, (Column D), the Saved Policies of the Mid Suffolk Local Plan 1998 (Column E) and the Mid Suffolk Local Plan First Alteration 2006 (Column F). In addition, conformity with the policies of the emerging Babergh Mid Suffolk Joint Local Plan, November 2020 has been assessed in a separate table.
- 4.6 In summary, the appraisal demonstrates that the Redgrave Neighbourhood Development Plan has had appropriate regard to and is in general conformity with, both national and strategic policy.

Assessment of policies in the Redgrave Neighbourhood Plan against National and Local strategic policies

Redgrave Neighbourhood Development Plan Policy (A)	NPPF 2019 (B)	Mid Suffolk Core Strategy 2008 (MSCS) (C)	Mid Suffolk Core Strategy Focussed Review 2012 [MSCSFR] (D)	Mid Suffolk Local Plan 1998 (Saved Policies) [MSLP] (E)	Mid Suffolk Local Plan 1 st Alteration 2006 (Saved Policies) [MSLPFA] (F)
RED1 New Housing	This policy is consistent with NPPF paragraph 29 which indicated that Neighbourhood Plans should not promote less development than that set out in the strategic policies for the area. The Neighbourhood Plan makes one specific allocation for 8 dwellings and also includes criteria that new housing development needs to meet. The policy allows for windfall development within the settlement boundary which would be over and above the existing commitment of 11 dwellings that is	This policy is consistent with Policy CS1 of the Core Strategy which identifies Redgrave as a Secondary Village (Tier 4). Secondary Villages are defined as “villages unsuitable for growth but capable of taking appropriate residential infill and development for local needs only. These villages will benefit from small-scale development to meet local needs but not the level of growth envisaged for primary settlements. Local needs include employment, amenity,	There is no specific comparator policy in the CSFR due to the limited scope of the CSFR and the specificity of this RNP policy.	This policy is consistent with MSLP policy H3 – Housing Development in villages. The local plan policy provides a presumption in favour of development within built up area (settlement boundaries) subject to criteria and Policy RED1 is consistent with those criteria.	There is no specific comparator policy (s)

	<p>outlined in the emerging Joint Local Plan. The policy is also consistent with paragraph 70 which refers to windfall sites.</p>	<p>and community facilities as well as small-scale infill housing and "rural exception" sites for affordable housing.</p> <p>Settlement boundaries will be retained around these settlements to facilitate appropriate development, while directing it to appropriate locations and restricting the scope and scale of development.</p> <p>Policy RED1 (and RED 2) makes a specific allocation, for 8 dwellings to meet a locally specified need. Policy RED1 also allows for further small scale/windfall development within the settlement boundary.</p>			
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<p>RED2: Housing Allocation</p>	<p>This policy is consistent with NPPF paragraph 29 which indicated that Neighbourhood Plans should not promote less development than that set out in the strategic policies for the area. The Neighbourhood Plan makes a specific allocation for eight dwellings in Churchway, which would be over and above the existing figure of 11 dwellings that is outlined in the emerging Joint Local Plan.</p>	<p>This policy is consistent with Policy CS1 of the Core Strategy which identifies Redgrave as a Secondary Village (Tier 4) capable of accommodating small scale growth.</p> <p>Policy RED2 sets out the detailed criteria for the development of the site including, design, landscaping, and access arrangements, safeguarding of historic environment and landscape consistent with Core Strategy Policy CS5.</p>	<p>There is no specific comparator policy in the CSFR due to the limited scope of the CSFR and the specificity of this RNP policy.</p>	<p>This policy is consistent with MSLP policy H3 – Housing Development in villages. The local plan policy provides a presumption in favour of development within built up area (settlement boundaries) subject to criteria and Policy RED2 is consistent with those criteria.</p> <p>Policy H13 of the Adopted Local Plan sets out the criteria for the development of new housing sites which includes, density, layout, scale, landscaping, access, and protection of historical features.</p> <p>The criteria covered in Policy RED2 are consistent with those of the Adopted Policy.</p>	<p>MSLPFA policy H4 Affordable Housing in new housing developments seeks to negotiate up to 35% of housing to be affordable on sites of 5 or more. This requirement has been superseded by the NPPF in relation to the threshold for 10 dwellings. The proposed allocation is for 8 dwellings.</p>
<p>RED3: Housing Type</p>	<p>This policy reflects NPPF para 61 which advises that planning policies</p>	<p>Policy CS9 of the Core Strategy “Density and Mix” requires that new</p>	<p>There is no specific comparator policy in the CSFR due to the</p>	<p>This policy is consistent with MSLP policy H14 which seeks a range of</p>	<p>MSLPFA policy H4 Affordable Housing in new</p>

	<p>should reflect the needs of “those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes”.</p> <p>The policy reflects the results of consultation with the local community.</p>	<p>housing development should provide a mix of house types, sizes, and affordability to cater for different accommodation needs.</p> <p>Policy RED3 positively encourages a wide range of types of housing that meet local needs and makes special provision for those types of housing identified through consultation e.g., housing for families, smaller family/ starter homes, affordable housing, and bungalows.</p>	<p>limited scope of the CSFR and the specificity of this RNP policy</p>	<p>house types to meet different accommodation needs.</p> <p>Policy RED3 supports the criteria in the policy, which has been developed through consultation with local residents.</p>	<p>housing developments seeks to negotiate up to 35% of housing to be affordable on sites of 5 or more. This requirement has been superseded by the NPPF in relation to the threshold for 10 dwellings. However, RED3 specifically identifies affordable housing.</p>
<p>RED4: Existing Community Facilities</p>	<p>This policy seeks to retain existing community facilities and is consistent with criterion c of paragraph 92, which urges planning policies to</p>	<p>There is no direct comparator policy in the Core Strategy.</p> <p>Policy RED4 seeks to safeguard the existing</p>	<p>There is no specific comparator policy in the CSFR due to the limited scope of the CSFR and the</p>	<p>This policy is consistent with the aims of a number of MSLP policies including RT1 Sports and Recreational facilities, RT2 Loss of existing</p>	<p>There is no specific comparator policy (s)</p>

	<p>“guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs”.</p>	<p>community facilities in Redgrave but also recognises that the needs of the community may change during the plan period and that a need for new or improved facilities may be identified.</p>	<p>specificity of this RNP policy</p>	<p>sports and recreation facilities, RT3 Protecting recreational open space and development of types of community facilities. RED4 seeks to protect existing community facilities consistent with the aims of the MSLP policies.</p>	
<p>RED5: New or Improved Community Facilities</p>	<p>This policy is consistent with paragraph 8b of the NPPF, which outlines the social objective of the NPPF and specifically highlights the need for “accessible services and open spaces that reflect current and future needs and supports communities’ health, social and cultural well-being”.</p> <p>This policy is consistent with NPPF para 92 which states: “To provide the social, recreational, and cultural facilities and services the</p>	<p>This policy is consistent with Core Strategy Policy CS6, which indicates that new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development. Local priorities for which infrastructure contributions may be sought include utility provision, social and community facilities, village service</p>	<p>There is no specific comparator policy in the CSFR due to the limited scope of the CSFR and the specificity of this RNP policy</p>	<p>This policy is consistent with the aims of a number of MSLP policies including RT1 Sports and Recreational facilities, RT2 Loss of existing sports and recreation facilities, RT3 Protecting recreational open space and development of types of community facilities. RED4 seeks to protect existing community facilities consistent with the aims of the MSLP policies as well as</p>	<p>There is no specific comparator policy (s)</p>

	<p>community needs, planning policies and decisions should:</p> <p>a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;”</p>	<p>and facilities, ...open space, sport, cultural and leisure facilities, green infrastructure, and improvement measures (aimed at achieving a net gain for biodiversity and geodiversity).</p> <p>Policy RED5 requires that community infrastructure should be in place to meet the needs of new development. It also identifies the Redgrave Activities centre as a key piece of community infrastructure that would benefit from improvement.</p>		<p>encouraging new facilities.</p>	
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<p>RED6: Area of Important Landscape Sensitivity</p>	<p>This policy reflects NPPF para 127 b) and c) which require planning policies to ensure that developments are “visually attractive” as a result of “appropriate and effective landscaping” ...and are sympathetic to ...the surrounding built environment and landscape setting”. In addition, paragraph 170 of the framework which advocates “protecting and enhancing valued landscapes “and NPPF paragraph 170 b) which recognises the need to contribute to and enhance the intrinsic character and beauty of the countryside”</p>	<p>This policy is consistent with Core Strategy Objectives SO4, which seeks to protect, manage, enhance, and restore the historic heritage / environment and the unique character and identity of the towns and villages by ensuring that new developments are appropriate in terms of scale and location in the context of settlement form and character.</p> <p>Policy RED6 seeks to protect the individual character and landscape setting of Redgrave consistent with this objective and with Core Strategy Policy CS5, which seeks to protect and conserve landscape quality and promotes high quality design that</p>	<p>The Mid Suffolk Core Strategy focussed review concentrated largely on refreshing the housing figures for the district and updated employment chapter to justify employment allocations at Stowmarket.</p> <p>Therefore, there is no specific comparator policy for RED6 in the CSFR.</p>	<p>This policy is consistent with MSLP POLICY CL1, which seeks to protect the landscape quality and character of the countryside for its own sake, proposals for development in the countryside should be sited and designed to have minimum adverse effect up on the appearance of the landscape and should seek to positively contribute to its diverse character through tree planting and the creation of hedgerows, deciduous woodlands, and other wildlife habitats.</p> <p>It also specifically designates two areas of the parish as Special Landscape Areas – these are adjacent to the Parish Boundary in the north of the parish and</p>	<p>There is no specific comparator policy (s)</p>
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		respects local distinctiveness.		south east of the Parish close to Redgrave Park. Policy RED6 seeks to continue the protection for these areas and redefines the as Areas of Local Landscape Sensitivity (ALLS)	
RED7: Protection of Important Public Local Views	This policy reflects NPPF para 127 b) and c) which require planning policies to ensure that developments are “visually attractive as a result of “appropriate and effective landscaping...and are sympathetic to ...the surrounding built environment and landscape setting”. In addition, paragraph 170 of the framework which advocates “protecting and enhancing valued landscapes “and NPPF paragraph 170 b) which recognises the need to contribute to and	This policy is consistent with Core Strategy Objectives SO4, which seeks to protect, manage, enhance, and restore the historic heritage / environment and the unique character and identity of the towns and villages by ensuring that new developments are appropriate in terms of scale and location in the context of settlement form and character. Policy RED7 seeks to protect important individual views that	There is no specific comparator policy in the CSFR due to the limited scope of the CSFR	This policy is consistent with MSLP policies SB2 Development Appropriate to its setting, SB3 Visually Important Open Spaces and GP1 Design and Layout of Development. The local plan policies set out design criteria by which new development will be considered and this policy complements their ambitions by providing a local context and identifies important local characteristics including important views.	There is no specific comparator policy (s)

	<p>enhance the intrinsic character and beauty of the countryside”.</p> <p>This policy also reflects NPPF paragraph 170 b) which recognises the need to contribute to and enhance the intrinsic character and beauty of the countryside.</p>	<p>contribute to the character and landscape setting of Redgrave consistent with this objective and with Core Strategy Policy CS5, which seeks to protect and conserve landscape quality and promotes high quality design that respects local distinctiveness.</p>			
<p>RED8: Protection of Local Green Spaces</p>	<p>This policy reflects NPPF paras 99-101, which advocates. “The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them”.</p> <p>The spaces proposed for protection have been</p>	<p>Policy RED9 identifies and protects three Local Green Spaces. There is no specific reference to Local Green Spaces within the adopted Core Strategy.</p>	<p>There is no specific comparator policy in the CSFR due to the limited scope of the CSFR.</p>	<p>This policy is consistent with MSLP policy SB3 Retaining Visually Important Open Spaces, which seeks to protect spaces important for their visual qualities. RED9 provides a locally updated perspective and identifies two spaces to be protected which includes 2 from the 1998 MSLP</p>	<p>There is no specific comparator policy (s)</p>

	assessed against the criteria in the NPPF.				
RED9: Protection of Natural Assets	<p>This policy reflects NPPF paragraph 170, which seeks to ensure that policies protect and enhance sites of biological or geological value...minimise impacts on and provide net gains for biodiversity including establishing coherent ecological networks.</p> <p>RED8 identifies the significance of Redgrave and Lopham Fen in terms of its international importance for wildlife.</p>	<p>This policy is consistent with Core Strategy Policy CS5, which seeks to protect, manage, and enhance biodiversity, including species and habitats, wildlife corridors and ecological networks.</p> <p>Policy RED8 recognises the particular importance of Redgrave and Lopham Fen in terms of its biodiversity value and seeks to ensure that new development does no harm.</p> <p>In addition, the policy identifies other specific habitats and features in Redgrave that should be retained and enhanced.</p>	<p>There is no specific comparator policy in the CSFR due to the limited scope of the CSFR.</p>	<p>Policies CL5, CL8 and CL9 are key environmental policies contained within the Adopted Local Plan that seek to protect important wildlife features and habitats including woodlands, trees, hedgerows, undesignated habitats, and designated wildlife sites.</p> <p>Policy RED8 sets out the wildlife features that are important to Redgrave.</p>	<p>There is no specific comparator policy (s)</p>

<p>RED10: Protecting Redgrave’s Historic Assets</p>	<p>This policy reflects NPPF paragraphs 184 to 202, which seek to conserve and enhance the historic environment. The policy covers designated and non- designated heritage assets together with sites that may have known or unknown archaeological value. It outlines the approach to assessing the impact of applications on designated and non-designated heritage assets including the need to balance and have regard to the scale of any harm or loss against the significance of the asset.</p> <p>This policy is consistent with paragraph 186 and 188, which recognises the importance of Conservation Areas as having special architectural and historic interest.</p>	<p>is consistent with Core Strategy Objectives SO4 which seeks to protect, manage, enhance, and restore the historic heritage / environment and the unique character and identity of the towns and villages by ensuring that new developments are appropriate in terms of scale and location in the context of settlement form and character.</p> <p>Policy RED10 provides specific detail on the architectural, cultural, and historical significance of Redgrave.</p>	<p>There is no specific comparator policy in the CSFR due to the limited scope of the CSFR.</p>	<p>This policy is consistent with MSLP policy HB1 Protection of Historic Buildings. The MSLP provides a strategic policy for protecting the character and appearance of buildings of architectural or historic interest. RED10 provides a locally updated dimension.</p>	<p>There is no specific comparator policy (s)</p>
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<p>RED11: The Design of New Development</p>	<p>This policy reflects NPPF para 127 which sets out the design criteria that development should meet for example “visually attractive as a result of good architecture, layout and appropriate and effective landscaping”.. “sympathetic to local character and history, including the surrounding built environment and landscape setting while not preventing or discouraging appropriate innovation or change” ...”create places that are safe, inclusive...with a high standard of amenity...and where crime and the fear of crime do not undermine the quality of life or community cohesion or resilience”</p> <p>The policy contains clear criteria relating to density, scale, local</p>	<p>Policy CS5 of the Core Strategy requires that: “Development will be of a high-quality design that respects the local distinctiveness and the built heritage of Mid Suffolk, enhancing the character and appearance of the district. It should create visual interest within the street scene”.</p> <p>Policy RED11 sets out design criteria that need to be met in order to create the high-quality design required by Policy CS5.</p> <p>Policy RED11 is consistent with Core Strategy Objectives SO4, which seeks to protect, manage, enhance, and restore the historic heritage / environment and the unique character and</p>	<p>There is no specific comparator policy in the CSFR due to the limited scope of the CSFR and the specificity of this RNP policy.</p>	<p>This policy is consistent with MSLP policies SB2 Development Appropriate to its setting and GP1 Design and Layout of New Developments, which provides the design criteria for assessing development proposals. FRES.10 provides a locally updated dimension which includes specific criteria that have been developed through consultation with local people</p>	<p>There is no specific comparator policy (s)</p>
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	<p>character, landscaping, wildlife, layout, amenity, trees and hedgerows, Secure by Design, parking, and storage.</p>	<p>identity of the towns and villages by ensuring that new developments are appropriate in terms of scale and location in the context of settlement form and character.</p>			
<p>RED12: Low Carbon and Future Sustainability</p>	<p>This policy is consistent with the NPPF Section 14 relating to climate change which urges planning policies to take a proactive approach to climate change, particularly para 151 which advocates the increase of, and use of, renewable and low carbon energy and heat; para 153 b) in relation to new development “ take account of landform, layout, building orientation, massing, and</p>	<p>Policy CS3 of the Adopted Core Strategy promotes the incorporation of measures such as grey water recycling, heat generation from renewable sources and passive solar gain.</p> <p>Policy RED12 includes criteria that supports and promotes solar gain, grey water recycling and rainwater capture, air, and</p>	<p>There is no specific comparator policy in the CSFR due to the limited scope of the CSFR and the specificity of this RNP policy.</p>	<p>There are no specific policies in the MSLP 1998 that are comparable to RED12.</p>	<p>There is no specific comparator policy (s)</p>

	<p>landscaping to minimise energy consumption “.</p> <p>This policy is consistent with NPPF section 14. and para 152 which supports community-led initiatives for renewable and low carbon energy.</p> <p>The policy provides positive support to proposals that include renewable, energy efficiency or low carbon measures.</p>	<p>ground source heat pumps etc and is consistent with the intentions of Policy CS3</p>			
RED13: New and Existing Business	<p>This policy reflects NPPF para 80 which requires planning policies and decisions to help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider</p>	<p>Policy RED13 is consistent with Policy CS11 of the Adopted Core Strategy seeks to protect existing sites in employment.</p>	<p>There is no specific comparator policy in the CSFR due to the limited scope of the CSFR and the specificity of this RNP policy.</p>	<p>This policy is consistent with MSLP policies E4 Protecting Existing Industrial/ Business Areas for employment generating uses and E5 Change of use within existing industrial commercial areas, E9 Extensions to existing industrial and commercial premises and E9 location of new</p>	<p>There is no specific comparator policy (s)</p>

	<p>opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. It is also consistent with paragraph 83a, which allows for” the sustainable growth and expansion of all types of business in rural areas.</p>			<p>business. The first part of RED13 specifically protects existing employment areas and allows for their expansion subject criteria.</p> <p>RED13 is also consistent with MSLP Policies, CL18 Changes of use for agricultural and other rural buildings to non-residential uses and CL13 Siting and Design of agricultural buildings, which support rural enterprise. The second part of RED13 encourages new business in the countryside and allows for the conversion or existing buildings and appropriately sited new buildings subject to amenity criteria.</p>	
<p>RED14: Traffic and Highway Safety</p>	<p>This policy is consistent with paragraph 110 c) which seeks to create</p>	<p>There is no directly comparable policy in the Core Strategy.</p>	<p>There is no specific comparator policy in the CSFR due to the</p>	<p>This policy is consistent with MSLP Policy T11, which seeks to create a</p>	<p>There is no specific</p>

	<p>secure and attractive places, which minimise the scope for conflict between pedestrians, cyclist, and vehicles.</p> <p>The focus of the policy is to create a safer highway environment.</p>		<p>limited scope of the CSFR and the specificity of this RNP policy.</p>	<p>safe traffic environment. RED14 supports this approach.</p>	<p>comparator policy (s)</p>
<p>RED 15: Walking and Cycling</p>	<p>This policy is consistent with paragraph 110 c) which seeks to create secure and attractive paces, which minimise the scope for conflict between pedestrians, cyclist, and vehicles.</p> <p>The focus of the policy is to create a safer environment and seeks to promote walking and cycling provision.</p>	<p>This policy is consistent with Core Strategy, Objective SO13 which seeks to encourage walking and cycling initiatives</p>	<p>There is no specific comparator policy in the CSFR due to the limited scope of the CSFR and the specificity of this RNP policy.</p>	<p>This policy is consistent with MSLP Policy T11, which seeks to improve facilities for pedestrians and cyclists. RED15 supports this approach.</p>	<p>There is no specific comparator policy (s)</p>
<p>RED16: Drainage and Floodrisk</p>	<p>This policy reflects para 155 which encourages development to be directed away from areas of Floodrisk and should not increase Floodrisk elsewhere.</p>	<p>Policy CS4 of the Core Strategy indicates that it will “support development proposals that avoid areas of current and future flood risk, and which</p>	<p>There is no specific comparator policy in the CSFR due to the limited scope of the CSFR and the</p>	<p>This policy is consistent with Policy SC4 Protection of Ground water supplies. The MSLP policy seeks to prevent the</p>	<p>There is no specific comparator policy (s)</p>

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		<p>do not increase flooding elsewhere,”</p> <p>Policy RED16 requires development to mitigate its own flooding and drainage impacts, to avoid the risk of flooding and seeks to prevent flooding or for flooding to be caused elsewhere.</p>	<p>specificity of this RNP policy</p>	<p>contamination of ground water resources.</p>	
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<p>Redgrave Neighbourhood Development Plan Policy</p>	<p>Babergh-Mid Suffolk Joint Local Plan – REG19 Pre-Submission Version November 2020 (BMSJLP)</p>
<p>RED1 New Housing</p>	<p>This policy is consistent with Joint Local Plan Policy SP03 Settlement Hierarchy, which identifies Redgrave as a Mid Suffolk Hinterland village. Hinterland villages are expected to provide around 10% of dwellings within the Plan period (approximately 1,267 dwellings).</p> <p>This policy is also consistent with the housing allocation shown in the table on page 43 of the Joint Local Plan, which indicates a figure of 11 dwellings for Redgrave. The NDP allows for additional dwellings above this requirement in the form of windfall sites of individual dwellings or small groups of up to 5 houses within the settlement boundary. In addition, it sets out criteria that would need to be satisfied by proposals outside of the settlement boundary.</p> <p>The Redgrave Neighbourhood Plan makes provision for 8 additional dwellings above the local housing requirement outlined in the BMSJLP.</p>
<p>RED2 Housing Allocation</p>	<p>This policy is consistent with Joint Local Plan Policy SP03 Settlement Hierarchy, which identifies Redgrave as a Mid Suffolk Hinterland village. Hinterland villages are expected to provide around 10% of dwellings within the Plan period (approximately 1,267 dwellings).</p> <p>This policy is also consistent with the housing allocation shown in the table on page 43 of the Joint Local Plan, which indicates a figure of 11 dwellings for Redgrave. The NDP allows for additional dwellings above this requirement in the form of windfall sites of individual dwellings or small groups of up to 5 houses within the settlement boundary. In addition, it sets out criteria that would need to be satisfied by proposals outside of the settlement boundary.</p> <p>The Redgrave Neighbourhood Plan makes provision for 8 additional dwellings above the local housing requirement outlined in the BMSJLP.</p>

<p>RED3 Housing Type</p>	<p>This policy is consistent with paragraph 06.08 of the emerging Joint Local Plan, which indicates that the greatest need for housing is for 2, and 3 bedroomed accommodation. Policy RED3 specifically refers to 2-3 bedrooms and family housing for Redgrave. The policy is also consistent with JLP Policy SP02 Affordable Housing, which seeks to maximise affordable housing provision on qualifying sites.</p> <p>Policy RED3 is also consistent with JLP Policy LP06, which allows for specific types of housing to accommodate specific needs. RED3 is based on consultation carried out with local residents and specifically refers to homes at the smaller end family of housing, housing for key workers and affordable housing.</p>
<p>RED4 Existing Community Facilities</p>	<p>This policy is consistent with JLP Policy LP31` which supports the provision of new community facilities and also protects existing facilities unless criteria relating to viability and alternative provision can be satisfied.</p>
<p>RED5 New or Improved Community Facilities</p>	<p>This policy is consistent with JLP policy SP08 Infrastructure Provision which seeks to ensure that new development should be supported by appropriate infrastructure provision. Both policies refer to the need for infrastructure needs to be identified in at an early stage of development.</p>
<p>RED6 Area of Local Landscape Sensitivity</p>	<p>This policy reflects JLP Policy LP19 which refers to the need for new development to integrate positively with the existing landscape character of the area and reinforce the local distinctiveness and identity of individual settlements. Proposals must be sensitive to their landscape and visual amenity impacts (including on dark skies and tranquil areas); subject to siting, design, lighting, use of materials and colour, along with the associated mitigation measures. Proposals should also enhance and protect landscape character and values and heritage assets such as; locally characteristic landscape features, for example by use of materials which complement the local individual landscape character, archaeological and historic patterns of settlement, and land use.</p>
<p>RED7 Important Public Local Views</p>	<p>This policy reflects JLP Policy LP19 which refers to the need for new development to integrate positively with the existing landscape character of the area and reinforce the local distinctiveness and identity of individual settlements. Proposals must be sensitive to their landscape and visual amenity impacts (including on dark skies and tranquil areas); subject to siting, design, lighting, use of materials and colour, along with the associated mitigation measures.</p>

RED8 Local Green Spaces	This policy reflects JLP paragraph 16.04 which refers to the designation of Local Green Space in neighbourhood Plans.
RED9 Protection of Natural Assets	<p>This policy is consistent with Policy LP18 Biodiversity and Geodiversity which requires development to follow a hierarchy of seeking firstly to; enhance habitats, avoid impacts, mitigate against harmful impacts, or as a last resort compensate for losses that cannot be avoided or mitigated for.</p> <p>Development should protect designated and, where known, potentially designated sites. Development which is likely to have an adverse impact upon designated and potential designated sites, or that will result in the loss or deterioration of irreplaceable biodiversity or geological features or habitats (such as ancient woodland and veteran/ancient trees) will not be supported.</p>
RED10 Protection of Historic Assets.	This policy is consistent with JLP Policy LP21 The Historic Environment, which recognises the importance of safeguarding and enhancing the Historic Environment. It also recognises the importance of the contribution that designated and non-designated heritage assets can make to the character of an area and its sense of place. assessing the impact of applications on non-designated heritage assets.
RED11 The Design of New Development	<p>This policy is consistent with JLP Policy LP26 in that both seek high quality design, which takes account of design elements such as scale, height, massing, and density together with residential amenity issues such as parking, landscaping, and designing out crime.</p> <p>This policy reflects JLP Policy LP26, which refers to the need for new development to be harmonious in its location and respond to the existing character and context.</p> <p>The policies contain clear criteria relating to density, listed buildings, landscaping, wildlife, layout, amenity, trees and hedgerows, Secure by Design, parking, and storage.</p>
RED12 Low Carbon and Future Sustainability	This policy is consistent with JLP Policy SP10 Climate Change which encourages renewable energies and low carbon technology. It is also consistent with Policy LP23 – Sustainable Construction and Design, which highlights the importance of energy efficiency measures and design principles such as orientation for solar gain. para 153 b) in relation to new development.

	The policy is also consistent with policy LP25, which sets out standards that development (including residential development) should seek to achieve. The policy provides positive support to proposals that include renewable, energy efficiency or low carbon measures.
RED13 New and Existing Business	This policy is consistent with JLP policy LP12 Employment Development, which supports new employment development in appropriate locations including extensions to existing enterprises and also Policy LP13 which seeks to safeguard existing sites in employment use.
RED14 Traffic and Highway Safety	This policy is consistent with JLP policy LP32 Safe Sustainable and Active Transport, which encourages walking and cycling and the creation of new and safe routes and links for pedestrians and cyclists.
RED15 Walking and Cycling	This policy reflects JLP Policy LP32, which encourages walking and cycling and the creation of new and safe routes and links for pedestrians and cyclists.
RED16 Drainage and Flood risk	This policy is consistent with JLP policy SP09 Enhancement and Management of the Environment, which encourages the use of Sustainable Urban Drainage Systems and seeks to take a proactive approach to management of flood risk. It is also consistent with Policy LP29 Flood Risk and Vulnerability, which seeks to direct development to areas with the least impact on flooding and to require development to mitigate their own Flood risk.

5 d) Achieving Sustainable Development

- 5.1 The NPPF 2019 states that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.¹ The appraisal of the Redgrave Neighbourhood Development Plan policies against NPPF policies presented above demonstrates how policies in the Neighbourhood Plan comply with the NPPF and therefore deliver sustainable development.
- 5.2. The NPPF states that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).

Economic, social, and environmental objectives

- 5.3 These objectives give rise to the need for the planning system to perform a number of roles as defined by the NPPF and set out below.
- 5.4 The objectives and policies contained within the Redgrave Neighbourhood Plan contribute towards each of these three objectives and cumulatively contribute to the achievement of sustainable development. How they achieve this is summarised below, Unsurprisingly, there is a degree of cross-over between policies and many contribute to more than one of the sustainable development objectives e.g., **RED11 The Design of New Development**, which contributes to both social and environmental objectives.
- 5.5 The plan has been formulated with Sustainable Development at its heart and looks forward with an eye on the legacy created for future generations. The vision itself refers to delivering a sustainable, enduring, environmental, affordable, and high-quality legacy.

Our Vision for Redgrave

“By 2036 Redgrave will continue to be a small, beautiful village that has, developed sustainably. It will develop in proportion to its rural character; rich, in green spaces surrounded by a diverse rural environment with a better balance of housing to meet the needs of its residents.”

¹ Resolution 42/187 of the United Nations General Assembly

- 5.6 The plan contains a set of seven objectives, which are identified in order to deliver the vision. These have been refined over time through consultation. The objectives are grouped in three themes: Community, Natural and Historic Environment & Business and Infrastructure.

**Community
Objective 1**

To provide for housing that meets the needs of the local population and achieves a better balance of available housing.

**Community
Objective 2**

To improve the community infrastructure of Redgrave, in order to provide more places for people, young and old, to undertake their work, leisure and community pursuits and to support the health and wellbeing of residents.

**Natural & Historic
Environment
Objective 3**

To protect and enhance Redgrave's natural and historic assets

**Natural & Historic
Environment
Objective 4**

To protect and maintain Redgrave's rural village identity and ensure that new development respects its form and character

**Natural & Historic
Environment
Objective 5**

To encourage low carbon initiatives and future sustainability

**Business &
Infrastructure
Objective 6**

To protect the existing business base of the village and ensure that the relationship between business and residents remains in harmony

Business & Infrastructure Objective 7

To seek to improve the physical infrastructure that serves the residents and businesses of Redgrave

5.7 The objectives each support development whilst recognising the important of safeguarding and enhancing the special qualities that contribute to the specific character of Redgrave. The three overarching themes mirror the sustainability objectives of the planning system as outlined in the NPPF.

5.8 The following table helps to further demonstrate the Plan’s comprehensive contribution to sustainable development.

NPPF Sustainable Development	Contribution through Redgrave Neighbourhood Plan Policies
<p>NPPF 2019</p> <p>An economic objective: to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places, and at the right time to support growth, innovation, and improved productivity; and by identifying and co-ordinating the provision of infrastructure.</p>	<p>Objective 6: To protect the existing business base of the village and ensure that the relationship between business and residents remains in harmony.</p> <p>Objective 7: To seek to improve the physical infrastructure that serves the residents and businesses of Redgrave.</p> <p>RED13: New and Existing Business. This policy supports the retention and expansion of existing businesses. It takes a positive approach to the reuse of redundant or unused historic or farm buildings.</p> <p>RED14: Traffic and Highway Safety. This policy promotes sustainable transport for all forms of development and ensures that effects upon the local highway network are effectively mitigated.</p> <p>RED16: Drainage and Floodrisk. This policy promotes the use of Sustainable Urban Drainage Systems, ensures that appropriate infrastructure is in place and ensures that development mitigates its own flood risk.</p>
<p>NPPF 2019</p> <p>A social objective: to support strong, vibrant, and healthy communities by ensuring that a sufficient number and range</p>	<p>Objective 1: To provide for housing that meets the needs of the local population and achieves a better balance of available housing.</p> <p>Objective 2: To improve the community infrastructure of Redgrave, in order to provide more places for people,</p>

<p>of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and</p>	<p>young and old to undertake their work, leisure and community pursuits and to support the health and wellbeing of residents.</p> <p>RED1: New Housing. This policy seeks to meet the housing needs in the parish and identifies a specific allocation and form of housing specifically to meet local need.</p> <p>RED2: Housing Allocation. Housing Allocation on Churchway. This policy sets out specific criteria for the development of a site for 8 dwellings, on Churchway.</p> <p>RED3: Housing Type. This policy supports the provision of housing and seeks to ensure that appropriate housing is provided to meet the needs of current and future generations.</p> <p>RED4: Existing Community Facilities. The policy seeks to protect existing community facilities where they are viable.</p> <p>RED5: New Community Facilities. This policy seeks to ensure that sufficient infrastructure to meet the needs of development is in place and supports the provision of new community buildings where a need is identified.</p> <p>RED11: The Design of New Development. This policy supports the health and wellbeing of the community by promoting developments that are safe, well designed, and accessible and meet the needs of the local community.</p> <p>RED14: Traffic and Highway Safety. This policy seeks to protect the safety of residents by ensuring that new development does not adversely affect highway safety.</p> <p>RED15: Walking and Cycling. The policy contributes to creating a high quality and safe environment by supporting new footpaths and cycleways which also help to improve overall community health.</p>
<p>NPPF 2019</p> <p>An environmental role: to contribute to protecting and enhancing our natural, built, and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently,</p>	<p>Objective 3: To protect and enhance Redgrave's natural and historic assets.</p> <p>Objective 4: To protect and maintain Redgrave's rural village identity and ensure that new development respects its form and character.</p> <p>Objective 5: To encourage low carbon initiatives and future sustainability.</p>

<p>minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	<p>RED6: Area of Local Landscape Sensitivity This policy seeks to protect and enhance the landscape that is important to the character of Redgrave.</p> <p>RED7: Protection of Important Public Local Views This policy seeks to enhance identified settlement edges of the parish through protecting important views from inappropriate development.</p> <p>RED8: Protection of Local Green Spaces. This policy seeks to protect specific spaces within the parish that have a community value either through their visual appearance, historic, recreational, or cultural value.</p> <p>RED9: Protection of Natural Assets. This policy seeks to create new habitats and restore and repair fragmented habitats and encourage the creation and enhancement of wildlife corridors.</p> <p>RED10: Protecting Redgrave’s Historic Assets. This policy contributes to the protection and enhancement of the historic environment by identifying the important contribution made by both designated and non-designated heritage assets and the Conservation Area.</p> <p>RED11: The Design of New Development. This policy contributes to protecting and enhancing the built environment by promoting the creation of high-quality developments, with a high standard of design, safe environments and the designing out of crime.</p> <p>RED12: Low Carbon and Future Sustainability. This policy seeks to aid in the mitigation and adaptation to climate change through promoting the minimum use of resources in both construction and operation of buildings and support for measures that re-use water and incorporate solar gain.</p> <p>RED15: Walking and Cycling. This policy promotes public access to the countryside and seeks to improve routes and connections.</p> <p>RED16: Drainage and Flood risk. This policy seeks to minimise pollution through the promotion of modern drainage measures to reduce flood risk.</p>
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6. f) Compatibility with EU Obligations

- 6.1 The statement below demonstrates how the Redgrave Neighbourhood Development Plan does not breach and is compatible with EU obligations. The United Kingdom formally left the European Union on the 31st January 2020, which was followed by an 11-month transition period that expired on 31st December 2020. Basic Condition (f) of the Neighbourhood Plan Regulations 2012 requires that the making of a Neighbourhood Plan should not breach nor be incompatible with European Obligations. These include those relating to environmental matters such as Habitats and Species.
- 6.2 Strategic Environmental Assessment (SEA) may be required for a Neighbourhood Plan if it is likely to have significant environmental effects. Sustainability Appraisal (SA) is similar to DEA but includes assessment for the likely significant effects of a plan or programme on economic and social factors as well as environmental factors.
- 6.3 Planning Practice Guidance¹ (PPG) clarifies that there is no legal requirement for a neighbourhood plan to be subject to SA, but that SA can be used to demonstrate how the plan will contribute to sustainable development.
- 6.4 In order to determine whether an assessment is required under European Directive 2001/42/EC (the SEA Directive), which was transposed into UK law through the SEA Regulations², Mid Suffolk District Council recommends that the Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) Screening processes be undertaken at Pre-Submission stage. The HRA Screening Assessment was carried out by Place Services in October 2020 and the SEA Screening Assessment was undertaken by LUC in September 2020.

SEA Screening

- 6.4 The SEA Screening Report takes into account the latest regulations, guidance and court judgements relating to this area including CJEU People Over Wind v Coillte Teoranta C-323/17 which rules that mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats site. The HRA Screening Report therefore does not consider mitigation measures within the assessment of Likely Significant Effects resulting from the Redgrave Neighbourhood Development

² The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). It should be noted that the purpose of the amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the European Union. No substantive changes are made to the way the SEA regime operates.

Plan. The Screening report also considers the impact of the judgement CJEU Holohan C- 461/17, which imposes more detailed requirements in the competent authority at Appropriate Assessment Stage.

6.5 Mid Suffolk District Council undertook the SEA Screening Process in November 2020. The SEA screening report produced by LUC notes that, that the Plan allocates one site for residential development, delivering 8 homes, in addition to the 16 homes on other sites for which planning permission has already been granted. It also notes that residential development allocated through the Plan could have a range of environmental effects both during construction and afterward and, it discusses its proximity to the Conservation Area and listed buildings, and that it lies within the Impact Risk Zone associated with nationally and internationally designated Redgrave and Lopham Fen. The Screening Report also notes that there are policies in the Plan and in the adopted Mid Suffolk Core Strategy that may provide mitigation, and that mitigation may also be provided by the policies in the emerging Babergh & Mid Suffolk Joint Local Plan but, given the sensitivity of the area in which the allocation is located it is considered that the potential to have significant environmental affects **cannot** be screened out for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC.

6.6 Consultation on the Screening Report was carried out with Natural England, Historic England, and the Environment Agency. Natural England agreed with the conclusion of the Screening Report.

6.7 Mid Suffolk's Screening Determination dated November 2020 therefore concluded that:

“In the light of the SEA Screening Report prepared by Land Use Consultant and the responses from the statutory bodies it is determined that a precautionary approach is necessary and that the Redgrave Neighbourhood Plan does require a Strategic Environmental Assessment in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004.”

HRA Screening

6.8 The HRA screening report produced by Place Services concluded that:

*“Subject to Natural England's review, this HRA Screening Report concludes that the Regulation 14 draft Redgrave Neighbourhood Plan is not predicted to have any Likely Significant Effect on any Habitats site, either alone or in combination with other plans and projects.
The requirement for the Plan to undertake further assessment under the Habitats Regulations 2017 is therefore 'screened out.'”*

- 6.9 Natural England subsequently confirmed that they concur with the conclusion of the HRA Screening.
- 6.10 Consequently, in November 2020, Mid Suffolk issued an HRA Screening Direction, which concluded that:

*“In the light of the Screening Report prepared by Place Services and the response from Natural England it is determined that the Redgrave Neighbourhood Plan **does not** require further assessment under the Habitats Regulations 2017”.*

Full Strategic Assessment of the Redgrave Neighbourhood Plan

- 6.11 Following the receipt of the SEA Screening Direction, the Neighbourhood Plan Steering Group in December 2020, commissioned consultants AECOM to undertake the Strategic Environmental Assessment.
- 6.12 The Final Environmental Report was completed in March 2021 and forms a submission document to accompany the Neighbourhood Plan. The report concluded that overall, the current version of the RNP is likely to lead to predominately positive effects. **Significant long-term positive effects** are anticipated in relation to population and communities and health and wellbeing through supporting sustainable growth of the community and healthy lifestyles. The RNP seeks to deliver housing to meet local needs; and ensures the type of housing being developed is likely to support the needs of all sectors of the local community. Further to this the RNP supports the vitality and viability of the village through the protection and enhancement of the high-quality public realm and valued green spaces, a net gain in community infrastructure that meets Redgrave’s needs, and support for sustainable local economic growth.
- 6.13 **Minor positive effects** are predicted for biodiversity and climate change given the Neighbourhood Plan policy framework sets out a number of requirements, which support local and national climate change objectives/ targets. Notably the premise for biodiversity protection, enhancement, and net gain embedded through the Neighbourhood Plan policy framework will lead to positive effects directly and indirectly for biodiversity and climate change respectively. Minor positive effects are, however, ‘uncertain’ at this stage in relation to biodiversity and will be dependent on the specific details of proposed mitigation (i.e. level of financial contributions to improving and enhancing overall open space and biodiversity provision).
- 6.14 **Neutral effects** are anticipated in relation to the landscape and historic environment SEA themes. The RNP policy framework seeks to ensure growth in the parish protects and where possible enhances Redgrave’s historic assets, landscape features and local villagescape; in addition to identified important local views.

- 6.15 **Neutral effects** are also anticipated in relation to the transportation theme. While sustainable transport opportunities in the village are limited and car reliance high, the RNP seeks to deliver new homes in a sustainable location, supporting active travel and connected communities.
- 6.16 **Minor negative effects** are predicted in relation to land, soil and water resources given the proposed site allocation will result in the loss of greenfield and agricultural land.

Cumulative effects

- 6.17 Cumulatively the RNP seeks to complement the provisions of the emerging Joint Local Plan by; allocating land to meet residual housing needs, seeking development proposals which contribute to the locally required mix of housing types and tenures, and supporting delivery of high-quality development which complements its setting, settlement form and village identity. In terms of in-combination effects on biodiversity Habitat sites, the HRA screening states that *“although the Plan allocates sites for development, the parish does not lie within an evidenced Zone of Influence for recreational disturbance impacts on Habitats sites in combination with other plans and projects. There is therefore no requirement for any mitigation measures to be embedded in the Plan to avoid any likely significant effects. Monitoring of recreational disturbance impacts is not currently required but may be requested in the future from Norfolk LPAs from Mid Suffolk DC.”*
- 6.18 Cumulative positive effects are therefore anticipated overall.

Recommendations

- 6.19 The final SEA makes the following recommendation as a consequence of the assessment of the draft RNP:
- “The supporting policy text for Policy RED10 states that, “given the wealth of historic assets (designated and non-designated) within Redgrave, early consultation with Suffolk County Council’s Archaeological Service is encouraged for advice on any proposals before they reach application stage.” To strengthen the RNP, it is recommended that this supporting text be moved into policy RED2. This would increase the weight of the requirement, avoiding adverse effects at an early stage through the implementation of neighbourhood planning policy”.***
- 6.20 This recommendation has been taken on board by the RNPSG and the wording of Policy RED2 has been amended accordingly.

Human Rights

- 6.21 In addition, the Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. The accompanying Consultation Statement sets out the process followed in terms of community involvement.

7. g) Prescribed matters

- 7.1 An additional basic condition is prescribed under Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 as follows:

“The making of the Neighbourhood Development Plan is not likely to have any significant effect on a European Site (as defined in the Conservation of Habitats and Species Regulations 2010 (2)) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c) Regulations 2007 (3)), (either alone or in combination with other plans and projects)”.

- 7.2 Natural England has been consulted on the pre-submission version of the Redgrave Neighbourhood Plan and has contributed to the SEA and HRA Screening Opinions. A full Strategic Environmental Assessment of the Neighbourhood Plan was carried out between December 2020 and March 2021 which concluded that:

*“**Minor positive effects** are predicted for biodiversity and climate change given the Neighbourhood Plan policy framework sets out a number of requirements which support local and national climate change objectives/ targets. Notably the premise for biodiversity protection, enhancement, and net gain embedded through the Neighbourhood Plan policy framework will lead to positive effects directly and indirectly for biodiversity and climate change respectively. Minor positive effects are however ‘uncertain’ at this stage in relation to biodiversity and will be dependent on the specific details of proposed mitigation (i.e) level of financial contributions to improving and enhancing overall open space and biodiversity provision). overall, the current version of the RNP is likely to lead to predominately positive effects”.*

- 7.3 Therefore, Redgrave Parish Council therefore considers that the Neighbourhood Plan meets the additional prescribed basic condition.