



Babergh District Council

Aldham Neighbourhood Development Plan

Submission Consultation Responses

In May 2019 Aldham 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 Tuesday 28 May until Wednesday 10 July 2019.

In total, 8 organisations submitted representations. These are listed below and copies of their representations are attached.

Ref No.	Consultee
(1)	Natural England
(2)	Historic England
(3)	Anglian Water
(4)	UK Power Network
(5)	Suffolk Preservation Society
(6)	Ipswich & East Suffolk CCG
(7)	Vision (o.b.o) Mr & Mrs Turner
(8)	Environment Agency (Late Representation)

(1) Natural England

Date: 10 July 2019
Our ref: 283651
Your ref: Aldham NP Reg 16 Consultation



communityplanning@baberghmidsuffolk.gov.uk

BY EMAIL ONLY

FAO Robert Hobbs

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

T [REDACTED]

Dear Robert Hobbs

Aldham Neighbourhood Plan - Regulation 16

Thank you for your consultation on the above dated 24 May 2019

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.

Aldham Neighbourhood Plan

The emerging strategic solution, The Suffolk Recreational Avoidance and Mitigation Strategy (Suffolk RAMS) is a key consideration in the context of the Habitats Regulation Assessment. The Suffolk RAMS seeks to mitigate the recreational impacts as a result of new development within the Zones of Influence (Zoi).

Aldham Neighbourhood Plan Policies

The Aldham Parish falls partially within the Zone of Influence (Zoi). There is therefore **residential development within the parish area which will be subject to the requirements of this strategic solution**. This will be in accordance with the RAMS supplementary planning document once adopted.

We would also take this opportunity to advise you that any windfall applications which would be in excess of what has been assessed in the Neighbourhood Plan Habitats Regulation Assessment (HRA), would need to be subject to their own, project level HRA.

Natural England welcome policy 6.16 and suggest that this is strengthened to ensure that future planning applications give due consideration to this strategic solution. For further guidance on this matter please see Annex 1 of this letter.

A recent judgment from the Court of Justice of the European Union ([Case C-323/17 People Over Wind v Coillte Teoranta](#)) has provided authoritative interpretation relating to the use of mitigation measures at the screening stage of a HRA, when deciding whether an appropriate assessment of a plan or project is required. The court concluded that measures intended to avoid or reduce the harmful effects of a plan or project on a European Site can only be considered as part of the appropriate assessment stage of HRA, and not at the preceding screening stage. This means that it is no longer appropriate to rely on these measures when deciding whether a plan or project is likely to have significant effect on a European site(s).

In light of this ruling, Natural England would bring your attention to subsequent changes to the

(1) Natural England

legislation that now allow for neighbourhood plans to progress to Appropriate Assessment to allow consideration of mitigation measures in the context of European sites (please see the Neighbourhood Planning (General) Regulations 2012 (as amended))

For clarification of any points in this letter, please contact Patrick Robinson on 020 802 64908. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely,

Patrick Robinson
Norfolk and Suffolk Area Team

Annex 1 – Example Wording for inclusion in Neighbourhood Plans – Suffolk RAMS

Habitats Regulations Assessments have been completed for the participating Suffolk RAMS Local Authorities as part of their upcoming Local Plans. These assessments have identified that the in-combination effects of these Local Plans, together with neighbouring local planning authorities Local Plans and neighbourhood plans are likely to adversely affect the integrity of European designated nature conservation sites ('European Sites'). In view of that your Local Planning Authority is working with other Suffolk Local Planning Authorities, and Natural England, on a Recreational disturbance Avoidance and Mitigation Strategy (RAMS). The Suffolk RAMS is a strategic solution to protect the Suffolk coast from the recreational pressures of a growing population. A RAMS is usually driven by challenges and opportunities arising from planning issues. RAMS generally applied more broadly than at a single designated European site, provides strategic scale mitigation and enables the development of a generic approach to evidence collection and use.

Financial contributions will be sought for all residential development, which falls within the zones of influence, towards a package of measures to avoid and mitigate likely significant adverse effects in accordance with the Environment policy intentions of your overarching Local Plan. This includes development allocated in Neighbourhood Plans. Details of the zones of influence and the necessary measures will be included in the Suffolk RAMS Supplementary Planning Document (SPD).

In the interim period, before the Suffolk RAMS is completed, proposals within the zones of influence for recreational disturbance to European sites will need to carry out a project level Habitat Regulations Assessment and implement bespoke mitigation measures to ensure that in-combination recreational disturbance effects are avoided and/or mitigated.

Policy. Recreational disturbance Avoidance and Mitigation

All residential development within the zones of influence of European Sites will be required to make a financial contribution towards mitigation measures, as detailed in the Suffolk RAMS, to avoid adverse in-combination recreational disturbance effects on European Sites. In the interim period, before the Suffolk RAMS is completed, all residential development within the zones of influence will need to deliver all measures identified (including strategic measures) through project level HRAS, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitats Regulations and Habitats Directive.

Annex 2 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)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](#)⁵ website and also from the [LandIS website](#)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.

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

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

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

(1) Natural England

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. 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.

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.

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>

(1) Natural England

- 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/>

(2) Historic England

Mr Paul Bryant
Babergh & Mid Suffolk District Councils
Corks Lane
Hadleigh
Ipswich
IP7 6SJ

Direct Dial: [REDACTED]

Our ref: PL00448722

3 July 2019

Dear Mr Bryant

Ref: Aldham Neighbourhood Plan Regulation 16 Consultation

Thank you for your correspondence dated 24 May 2019 inviting Historic England to comment on the Regulation 16 Submission version of the Aldham Neighbourhood Plan.

We welcome the production of this neighbourhood plan, but do not wish to provide detailed comments at this time. We would refer you to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:

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

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district 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 NP, 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,

[REDACTED]

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

cc:



Response Form

Aldham Neighbourhood Development Plan 2018 - 2036

The Neighbourhood Planning (General) Regulations 2012 - Regulation 16 (as amended)

Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	Mr Stewart Patience
Job Title (if applicable):	Spatial Planning Manager
Organisation / Company (if applicable):	Anglian Water Services Ltd
Address:	Thorpe Wood, Thorpe Wood House, Peterborough
Postcode:	PE3 6WT
Tel No:	
E-mail:	sPatience@anglianwater.co.uk

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



Section Two: Your representation(s)

To which part of the document does your representation relate? *(You may wish to complete a separate form for each separate representation)*

Paragraph No.		Policy No.	ALD3 and ALD4
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

We note that it is proposed to allocate two sites for residential development which includes a site currently with the benefit of planning permission.

Anglian Water has no objection to the principle of residential development on the sites identified in the Neighbourhood Plan.

..

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(3) Anglian Water

(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 responses through written representations.

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

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

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

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	✓
The final 'making' (adoption) of the Aldham NDP by Babergh District Council	✓

Signed: Stewart Patience

Dated: 9th July 2019



Response Form

Aldham Neighbourhood Development Plan 2018 - 2036

The Neighbourhood Planning (General) Regulations 2012 - Regulation 16 (as amended)

Section One: Respondents Details

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

Part A: Respondent	
Title / Name: Mr	Gary Sims
Job Title (if applicable):	Electrical Distribution Planning Technician
Organisation / Company (if applicable):	UK Power Networks
Address: Barton Road Bury St Edmunds	
Postcode: IP32 7BG	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	UK Power Networks
Address: Barton Road Bury St Edmunds Suffolk	
Postcode: IP32 7BG	
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	8(1)(a)(2)	Policy No.	Aldham NP Reg 16
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

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

Please be as brief and concise as possible..

Dear Sir / Madam

Further to Notice of Aldham Neighbourhood Development plan 2018- 2036 Work sent to us, please note the following guidance on UK Power Networks overhead lines.

High voltage overhead cables exists on the site development area that you are intending to commence work on and may present a serious risk to life if approached or contacted. It is important that all proposed works should comply with the requirements of Health & Safety Executive Document GS6 "Avoidance of danger from overhead electric lines".

For your information Health & Safety Documents are available from Her Majesty's Stationery Office and local offices of the HSE.

It may be necessary for the above to be diverted to enable your works to proceed. Also please note:

Our engineering guidelines state that the distance between a dwelling of two or more storeys with living or bedroom windows overlooking a distribution substation should be a minimum of ten metres if the transformer is outdoor, seven metres if the transformer has a GRP surround or one metre if the transformer is enclosed in a brick building. It is a recognised fact that transformers emit a low level hum which can cause annoyance to nearby properties. This noise is mainly airborne in origin and is more noticeable during the summer months when people tend to spend more time in their gardens and sleep with open windows.

A problem can also occur when footings of buildings are too close to substation structures. Vibration from the transformer can be transmitted through the ground and into the walls of adjacent buildings. This, as I am sure you can imagine, is very annoying.

In practice there is little that can be done to alleviate these problems after the event. We therefore offer advice as follows:

1. The distance between buildings and substations should be greater than seven metres or as far as is practically possible.

(4) UK Power Network

2. Care should be taken to ensure that footings of new buildings are kept separated from substation structures.

3. Buildings should be designed so that rooms of high occupancy, i.e. bedrooms and living rooms, do not overlook or have windows opening out over the substation.

If noise attenuation methods are found to be necessary we would expect to recover our costs from the developer.

Other points to note:

4. UK Power Networks require 24 hour vehicular access to their substations.

Consideration for this should be taken during the design stage of the development.

5. The development may have a detrimental impact on our rights of access to and from the substation. If in doubt please seek advice from our Operational Property and Consents team at Barton Road, Bury St Edmunds, Suffolk, IP32 7BG.

6. No building materials should be left in a position where they might compromise the security of the substation or could be used as climbing aids to get over the substation surround.

There are underground cables on the site associated with the substation and these run in close proximity to the proposed development. Prior to commencement of work accurate records should be obtained from our Plan Provision Department at UK Power Networks, Fore Hamlet, Ipswich, IP3 8AA.

7. All works should be undertaken with due regard to Health & Safety Guidance notes HS(G)47 Avoiding Danger from Underground services. This document is available from local HSE offices.

Should any diversion works be necessary as a result of the development then enquiries should be made to our Customer Connections department. The address is UK Power Networks, Metropolitan house, Darkes Lane, Potters Bar, Herts, EN6 1AG.

Regards

Gary Sims
Distribution Planning Technician
UK Power Networks
Barton Road
Bury St Edmunds
Suffolk
IP32 7BG

(Continue on separate sheet if necessary)

(4) UK Power Network

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

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

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

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

The publication of the recommendations of the Examiner	
The final 'making' (adoption) of the Aldham NDP by Babergh District Council	

Signed:

Dated: 29/05/2019

(5) Suffolk Preservation Society

SUFFOLK
PRESERVATION SOCIETY

Respecting the past, shaping the future

Little Hall Market Place
Lavenham Suffolk CO10 9QZ
Telephone (01787) 247179
email [REDACTED]
www.suffolksociety.org

8 July 2019

Aldham NP Consultation
c/o Mr Paul Bryant,
Spatial Planning Policy Team,
Babergh & Mid Suffolk District Council,
Endeavour House,
8 Russell Road, Ipswich, IP1 2BX

Dear Mr Bryant

Re: Aldham Neighbourhood Plan, Submission Draft Consultation

I am writing on behalf of the Suffolk Preservation Society (SPS), the only countywide amenity society dedicated to protecting and promoting the special historic and landscape qualities of Suffolk. We also represent the Campaign for the Protection of Rural England in Suffolk and work closely with parish and town councils and other bodies who share our objectives. As Neighbourhood Plans offer the opportunity for protecting or improving the heritage and landscape of an area, SPS are supportive of plans being drawn up in Suffolk.

Having read the draft plan we congratulate the Neighbourhood Planning group for the considerable amount of work that it has put into the plan so far. We note that the scope of the plan is restricted to the delivery of housing, but consider that the impact of new dwellings on the heritage and the landscape of the village is key to its success. Indeed it was clear from the feedback to the community consultation event that Aldham's strengths are identified as its presence as a beautiful hamlet within surrounding open countryside. We therefore offer the following observations which we feel should be considered before the plan is submitted for Examination.

Landscape

The Neighbourhood Plan (NP) references the emerging Babergh Mid Suffolk Joint local plan which is soon to be submitted for consultation. Whilst the NP is likely to be adopted in advance of the new local plan, it is important that its policies are compatible so that the NP is not viewed as out of date once the local plan is adopted.

The new local plan is required to be compliant with the NPPF and therefore, with regard to landscape designations, does not refer to Special Landscape Areas (SLAs) and instead references the 2015 Joint BMSDC Landscape Guidance. This identifies Aldham as being within an ancient claylands plateau area and details the characteristics of this landscape type as well as the aims, objectives and design principles for future development.

(5) Suffolk Preservation Society

We also strongly recommend, in line with many of the other emerging plans in Suffolk, that a landscape appraisal is carried to identify the most sensitive landscape areas and thereby those which can accommodate a limited amount of housing development. Moreover the Plan could be used to identify views within the parish which are most valued and sensitive to change. This can in turn inform a landscape policy within the plan which aims to protect the most sensitive landscapes from inappropriate speculative development.

Heritage

Similarly we note that whilst the listed buildings of the NP area are well documented in para 2.9, and the desire to limit the impact on listed buildings of conversion of farm buildings is covered in para 6.8, the aim to protect the historic environment is not set out in the plan policies. The inclusion of a dedicated historic environment policy could not only affirm the importance that the community places upon its built heritage it could also be extended to include a local list of any non-designated heritage assets which would ensure that the adopted plan forms locally-responsive planning policy.

Whilst listed buildings benefit from statutory protection, the Neighbourhood Plan allows for the identification of other (non-designated) heritage assets which also contribute to the village's distinctive character. This will strengthen their protection from demolition or harmful development within their setting which would otherwise be limited. The National Planning Policy Framework sets out the protection given to NDHAs (para. 197) when determining planning applications that affect them. Babergh District Council does not currently maintain a district-wide list of NDHAs and the production of a Neighbourhood Plan is an ideal opportunity to provide one for your parish.

Historic England also advocates this approach and provides advice to local groups via its website, in particular its guidance note [Neighbourhood Planning and the Historic Environment](#) .

We trust that you will find these comments helpful.

Yours sincerely,



Bethany Philbidge
BSc (Hons) MSc (Town Planning)
Planning Officer

Cc Heritage Team



Response Form

Aldham Neighbourhood Development Plan 2018 - 2036

The Neighbourhood Planning (General) Regulations 2012 - Regulation 16 (as amended)

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:	Chris Crisell
Job Title (if applicable):	Estates Planning & Support Project Manager
Organisation / Company (if applicable):	Ipswich & East Suffolk CCG
Address:	Endeavour House, 8 Russell Road, Ipswich,
Postcode:	IP1 2BX
Tel No:	
E-mail:	Chris.crisell@suffolk.nhs.uk

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

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Policy No.
---------------	------------

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose **Have Comments**

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

Thank you for communicating with Ipswich and East Suffolk Clinical Commissioning Group (CCG) regarding Aldham Parish Council's proposal to create a Neighbourhood Plan (NP). The CCG recognises that the Parish of Aldham does not have a primary healthcare facility actually inside the parish but do have healthcare facilities nearby in Hadleigh which residents of Aldham predominantly use. To maintain a primary care service for the residents of Aldham, mitigation might be sought through a Community Infrastructure Levy (CIL) from developments in the Parish.

The Neighbourhood Plan provides for up to 8 dwellings in the parish. Ipswich and East Suffolk CCG would like to make the Parish Council aware that smaller developments make it more difficult to gain mitigation through CIL or Section 106 for healthcare than larger developments done in one go. The number of residents will result in a small increase of patients on the respective surgery patient lists and therefore the need to mitigate the planned expansion is minimal.

We would welcome the addition of a simple statement, to confirm that Aldham Parish Council will support Ipswich & East Suffolk CCG in ensuring suitable and sustainable provision of Primary Healthcare services for the residents of Aldham. Ipswich and East Suffolk CCG would welcome the opportunity to discuss with the Parish Council potential solutions to ensure sustainable Primary Care services for the local community going forward.

If you have any queries or require further information, please do not hesitate to contact me..

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(6) Ipswich & East Suffolk CCG

(Continue on separate sheet if necessary)

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

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Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	
The final 'making' (adoption) of the Aldham NDP by Babergh District Council	

Signed:

Dated:09.07.2019

Mr David Brown
Clerk to Aldham Parish Council
Southmead
Red Hill
Aldham
Suffolk IP7 6NH

(Sent by email)
09th July 2019

Dear Mr Brown

ALDHAM NEIGHBOURHOOD PLAN – Regulation 16 of The Neighbourhood Planning (General) Regulations, 2012 (as amended)

On behalf of our client we wish to make the following representations to the Aldham Neighbourhood Plan Consultation (Regulation 16 of The Neighbourhood Planning (General) Regulations, 2012 (as amended)). This should be read in conjunction with our original submission (Reg 14 Pre-Submission Consultation) dated 12th April, as the matters raised still stand. The key points our represented client wishes to make to the Neighbourhood Plan (NP) are as follows:

- The NP, in the Consultation Statement, argues that the proposed allocation of 15 dwellings makes a significant contribution towards planned housing growth. This is considered to be misleading. The most recent permission for 7 dwellings is included in the planned growth for the 15 identified units. This permission was approved prior to the first issue of the draft NP so it is questioned why this site is included in the proposed allocation. The NP plan is promoting growth up to 2036. As such a growth of 15 dwellings is being proposed between 2011 and 2036 (25 years) representing less than one dwelling per year. This does not accord with the settlement policies of the Babergh Local Plan for planned growth of Hinterland settlements.
- In respect of the identified site of policy ALD4, it is agreed that the development of this, and the additional land to the north, would be inappropriate as an “estate” style development. However, there are plenty of villages (similar in growth pattern) that have allowed growth in the form of a mews or cul-

(7) Vision (o.b.o) Mr & Mrs Turner

de-sac style. This form of development can blend in perfectly within a linear village without causing any harm to its character and setting. It can be suitably well landscaped and allows greater scope to deliver the required level of housing.

- The suggested imposition of a woodland screen along the northern boundary of the allocation ALD4 is not only onerous but more importantly is unachievable and inappropriate. Neighbouring land to the east and west have not had to impose such landscaping. This simply appears as an attempt to restrict future growth of the remaining lands to the north. Any growth of said land would be the subject of a planning application and so can be controlled / determined accordingly without the need for a landscape boundary. Requiring the planting of a woodland screen will render the development of this site as unviable based upon the number and size of dwellings suggested in the NP.
- Rather than automatically discount the prospective development of land to the north of ALD4, our client would look to work with the Parish Council on producing a master plan to establish housing and community need. There exists an opportunity to provide public open space, which the village does not have at present. Accompanying this representation is an indicative draft master plan (drawing no. 4053-02) prepared by Patrick Allen Associates. This depicts how a low density affordable housing led scheme can be provided that not only blends in with the pattern of the village, but importantly would have no detrimental impact upon key street scene settings. The scheme could be arranged around a village green and be provided with appropriate landscaping. The site is provided with mains services (water, mains sewerage, electricity) and deliverable within a quick timeframe. If the parish were to be amenable to such an approach it is expected that further negotiations can be undertaken to agree on the precise detail of the sites development.
- In Para 6.14 of the NP the suggestion that the site to the North of The Street be brought forward no earlier than 2026 is contradictory to the parishes requirement for smaller units to be built. This site has been identified for smaller units, which the parish require, yet is being restricted in its time period for coming forward for development. Larger housebuilder have been criticised in the press for “landbanking” to drive up demand and housing cost, yet the NP is forcing our client to “landbank” their site. There is clear demand for housing now and the imposition of a time restriction is counterintuitive. There has been no clear reason provided why the time restriction should be in place and we would therefore suggest this be removed.

(7) Vision (o.b.o) Mr & Mrs Turner

- A total of 12 of the 15 identified housings required have been allocated in the NP. The NP suggests the remaining 3 dwellings come forward in the form of infill development. Relying on infill to contribute towards identified growth is not a sustainable way of providing said growth. Infill development should be used to contribute towards windfall housing, not identified strategic housing numbers. The identified settlement boundary of Aldham is drawn relatively tight, and as such limits the amount of new development that can be accommodate within this boundary. Should suitable site to accommodate infill development not be identified within the NP?
- The final comment relates the general principle of the NP suggestion that the site identified in the Strategic Housing and Economic Land Availability Assessment (SHELAA) August 2017 BE REDUCED FROM 2.2HA to 0.3HA. The SHELAA identified our client's site (reference SS0258) as being potentially suitable for residential development, but that only part of the site be available. The SHELAA provided an estimate yield of 5 dwellings, but this has not been based upon any further works / evidence being presented to the Council during this consultation. The reduced site to just 0.3HA is considered to be too small to facilitate appropriate scaled growth. It is agreed that the whole of the SHELAA site is not suitable for residential development. As already identified in this letter, the larger site represents an opportunity to bring forward a masterplan growth for Aldham for a mix of residential and community uses.

We trust the comments within this letter, and that of the 12th April 2019, will be taken into consideration accordingly.

Yours sincerely

Ben Willis BA Hons (PG/DIP) MRTPI

DIRECTOR

M: [REDACTED]

©This drawing and design are copyright.
Do not scale from this drawing. Use only figured dimensions. If in doubt, ask.
All dimensions are to be checked on site.
Any discrepancies should be reported immediately to the Architect.

	AFFORDABLE 1 bedroom bungalow	2no
	AFFORDABLE 2 bedroom bungalow	2no
	AFFORDABLE 3 bedroom houses	2no
Total units		6no
	3 bedroom houses	6no
	4 bedroom houses	6no
Total units		12no



DATE	REV.	DESCRIPTION	DRAWN

PatrickAllen&Associates
Architects

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www.patrickallen.org.uk
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2 Grange Business Centre
Tommy Flowers Drive
Grange Farm
Kesgrave, Ipswich
Suffolk, IP9 2BY

Project
Proposed Housing
Adj. Red House Farm, Aldham

Client
-

Drawing Title
Scheme on Promap

Drawing Status
Preliminary

Scale	Paper Size	Date	Drawn
1:500	A1	Jul 2019	-

Drawing Number
4053-02

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Mr Paul Bryant
Suffolk County Council
Property
Endeavour House Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2019/124130/01-L01
Your ref: REG 16 NHP
Date: 12 July 2019

Dear Mr Bryant

REG 16 ALDHAM NHP

Thank you for your consultation dated 24 May 2019. We have inspected the Regulation 16 Aldham Neighbourhood Development Plan, as submitted, and have highlighted key environmental constraints, as detailed below, which should be considered during the development of the Plan.

Our principle aims are to protect and improve the environment, and to promote sustainable development, we:

- Act to reduce climate change and its consequences.
- Protect and improve water, land and air.
- Work with people and communities to create better places.
- Work with businesses and other organisations to use resources wisely.

You may find the following document useful. It explains our role in the planning process in more detail and describes how we work with others; it provides:

- An overview of our role in development and when you should contact us.
- Initial advice on how to manage the environment impact and opportunities of development.
- Signposting to further information which will help you with development.
- Links to the consents and permits you or developers may need from us.

Our role in development and how we can help:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_2745_c8ed3d.pdf

Contaminated Land

For land that may have been affected by contamination as a result of its previous use or that of the surrounding land, sufficient information should be provided with any planning application to satisfy the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk Assessment (including a desk study, conceptual model and initial assessment of risk), and provide assurance that the risk to

Environment Agency
Cobham Road, Ipswich, Suffolk, IP3 9JD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

(8) Environment Agency

the water environment is fully understood and can be addressed through appropriate measures. This is because Aldham Neighbourhood Plan Area is a source protection zone 2 and 3 as well as on a principal Aquifer. For any planning application the prior use should be checked to ensure there is no risk of contamination.

Flood Risk

There is a small flood zone to the west of Red Hill Road. While no allocated sites are included in the Neighbourhood plan within flood zones 2 and 3, it should be recognised that if any future proposed development is allocated within this site then the development should be accompanied by a Flood Risk Assessment and be sequentially sited.

Natural Capital

Studies have shown that natural capital assets such as green corridors and green amenity spaces are important in climate change adaptation, flood risk management, increasing biodiversity and for human health and well-being. An overarching strategic framework should be followed to ensure that existing amenities are retained as well as enhancements made and new assets created wherever possible.

We are pleased to see within the Plan, Policy ALD6 Local Green Space. The designation of 'local green spaces' is an important method of protecting natural capital assets. We recommend the protection of these spaces, and encourage enhancements to be made to them to help support biodiversity and varied habitats that will help improve the ecological footprint of any development locations in the parish.

Designating green spaces is a positive approach, but through improving existing spaces and incorporating native species and varied habitats into designs of new areas will encourage net gains in biodiversity and wildlife links/corridors and deliver the best possible environmental outcomes. Enhancement to existing habitats should where possible feature within any conservation plans in development, and the National Planning Policy Framework (NPPF) paragraph 170, sub section d) states planning policies and decisions should contribute to and enhance the natural and local environment by: 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'. NPPF paragraph 174 goes further to emphasise the importance of biodiversity and how plans should set out protection and enhancement measures.

Development management will guide the provision of green infrastructure which should be delivered in a collaborative approach between developers, councilors and the local community. Sustainable Drainage Systems (SuDS) are often part of building green infrastructure into design. For more information please visit:

<https://www.susdrain.org/delivering-suds/using-suds/background/sustainable-drainage.html>

Please note that the views expressed in this letter by us are a response to the proposed Neighbourhood Development Plan only and do not represent our final views in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such applications.

Please contact me on the details below should you have any questions or would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan.

(8) Environment Agency

We trust that this advice is useful.

Yours sincerely



Miss Natalie Kermath
Planning Advisor

Direct dial [REDACTED]

Direct e-mail [REDACTED]

Late Representation