



ALDHAM NEIGHBOURHOOD PLAN 2018-2036 REVIEW

Submission Draft Plan
Aldham Parish Council
May 2025

FOREWORD

In 2020 the Parish Council completed the preparation of a Neighbourhood Plan for Aldham when 91% of residents that voted supported Babergh District Council adopting the Plan and using it when making planning decisions.

Four years on, it was identified that there was a need to update one of the key planning policies in the Plan, the policy that determines where development would be allowed to take place.

In November 2023, Babergh District Council adopted Part 1 of a new Joint Local Plan for Babergh and Mid Suffolk districts. Whereas the previous Local Plan allowed development, including housing, to take place outside of defined "Built-Up Area Boundaries" where a need could be demonstrated, the new Local Plan (Policy SP03) limits all but specific exceptions of development to take place within "Settlement Boundaries". However, the same policy states that "Outside of the settlement boundaries, development will normally only be permitted where... it is in accordance with a made Neighbourhood Plan...".

The made Aldham Neighbourhood Plan stated that "Proposals for development located outside the Built-Up Area Boundary (BUAB) will only be permitted where it can be satisfactorily demonstrated that there is an identified local need for the proposal and that it cannot be satisfactorily located within the BUAB."

The consequence of the adoption of the Local Plan is that our Neighbourhood Plan policy was not consistent with many other neighbourhood plans across Babergh. As a result, it was considered that Aldham could come under pressure for further housing development outside the Settlement Boundaries if a developer can demonstrate to the District Council that a "local need" exists.

This Neighbourhood Plan Review primarily focuses on bringing Policy ALD 1 and the Planning Strategy chapter up-to-date. At the same time, opportunities have also been taken to update other background information in the Plan whilst no other changes to planning policies have been made other than factual (replacing reference to BUAB with Settlement Boundary). The updates primarily reflect changes to the National Planning Policy Framework, the adoption of Part 1 of the Babergh and Mid Suffolk Joint Local Plan, the publication of the 2021 Census results and changes in the village to available services and facilities.

Prepared By Aldham Parish Council, with support from



ALDHAM



PULL

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1. Introduction

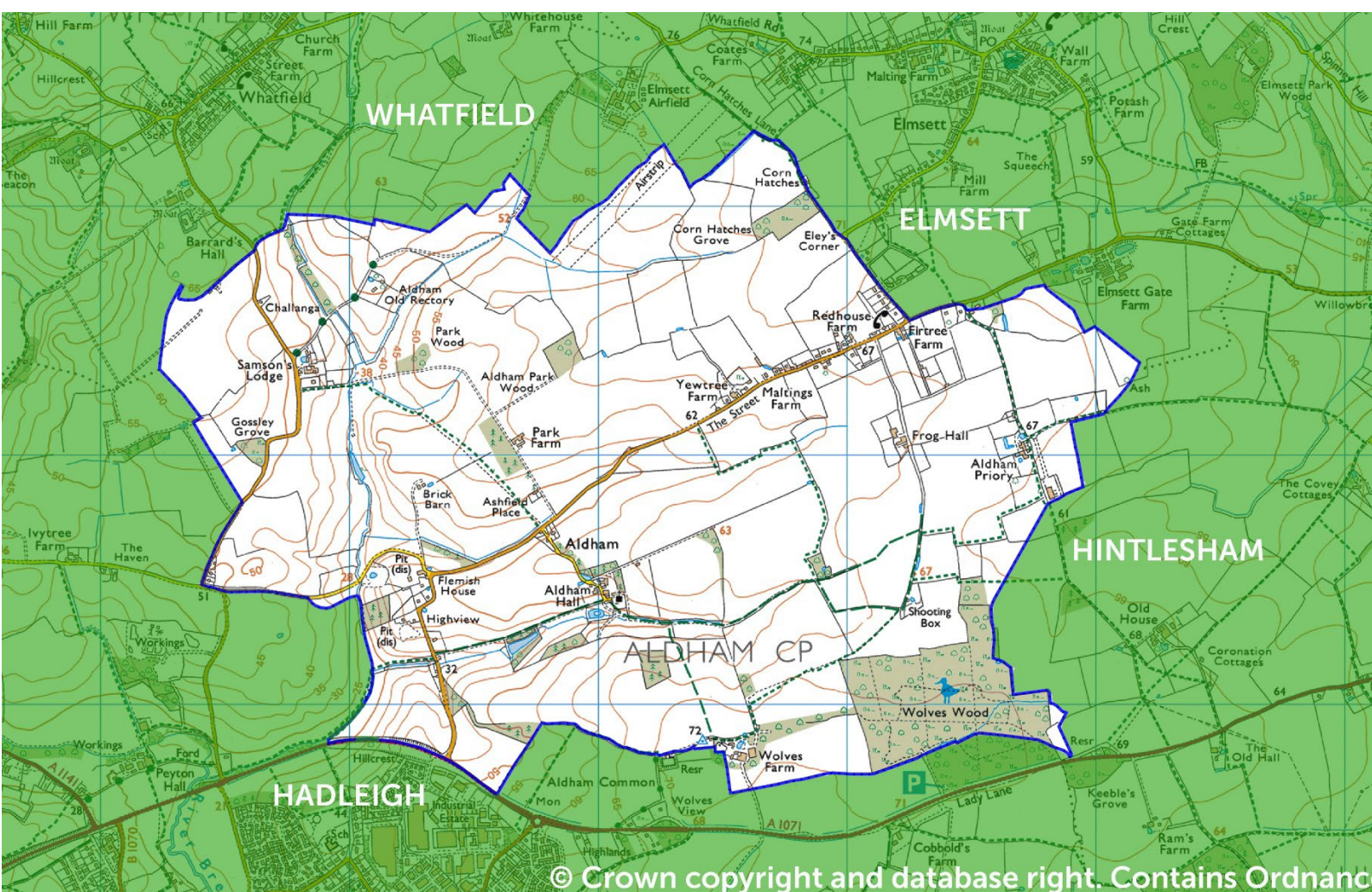
- 1.1 The Localism Act 2011 introduced new rights and powers to allow local communities to shape new development in their community by preparing a Neighbourhood Development Plan, which can establish general planning policies for the development and use of land in the neighbourhood. This document is a Neighbourhood Development Plan which can establish general planning policies for the development and use of land in the neighbourhood. This document is a Neighbourhood Development Plan (the Plan) as defined by the Act and has been prepared by Aldham Parish Council, which is the “qualifying body” as defined by the Localism Act 2011. Preparation of the Plan has been supported by Places4People Planning Consultancy
- 1.2 A neighbourhood plan is a community-led planning framework for guiding the future development, regeneration and conservation of an area. It is about the use and development of land and contains planning policies and proposals for improving the area or providing new facilities, or allocation of key sites for specific kinds of development.
- 1.3 Town and Parish councils are encouraged to produce their own neighbourhood plans enabling local people to have a say in how their neighbourhood grows and develops. In a designated neighbourhood area which contains all or part of the administrative area of a town or parish council, the town or parish council is responsible for neighbourhood planning.
- 1.4 Paragraph 30 of the National Planning Policy Framework (NPPF) states that: “Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”.
- 1.5 The Neighbourhood Plan contains planning policies that will be used for determining planning applications in the parish.

How the Plan has been prepared

- 1.6 The Neighbourhood Plan Regulations require a neighbourhood plan to:
- be appropriate, having regard to National Planning Policy;
 - contribute to achieving sustainable development;
 - be in general conformity with strategic policies in the development plan for the local area; and
 - be compatible with EU obligations and Human Rights requirements.
- 1.7 The Neighbourhood Plan has been prepared in accordance with the requirements of the Government’s Neighbourhood Planning Regulations and, in particular, has involved local community engagement to gather evidence for the content of the Plan.
- 1.8 On 14 June 2018, in accordance with the Neighbourhood Planning Regulations, Babergh District Council formally designated the whole parish as a Neighbourhood Plan Area, as illustrated in Map 1. Details of the application, publication and designation can be viewed on the District Council’s website under Neighbourhood Planning in Aldham. There are no other designated

neighbourhood plan areas within this boundary and the Parish Council is the “qualifying body” responsible for the preparation of the neighbourhood plan for this area.

- 1.9 At the outset of preparing the Neighbourhood Plan, an initial residents drop-in event was held on 18 July 2018 at St Mary’s Parish Church, between 4pm and 8pm to share all the information we had at the time about our Neighbourhood Plan, and to illustrate how important Map 1 - Neighbourhood Plan Area it is that everyone in the parish should feel able to contribute to its evolution prior to eventual submission.
- 1.10 A neighbourhood plan for Aldham was originally “made” by Babergh District Council on 21 January 2020. It followed a Parish Referendum when the majority of residents that voted supported the Plan being used by Babergh District Council is determining planning applications.



Map 1 – Neighbourhood Plan Area

Neighbourhood Plan Review

- 1.11 Early in 2024, the Parish Council agreed to proceed with a partial Review of the Neighbourhood Plan. A consultation was held on the proposed changes between 22 March and 13 May 2024. The changes focus on updating Policy ALD1 – Spatial Strategy, Chapter 3 – Planning Policy Context and Chapter 5 – Planning Strategy.

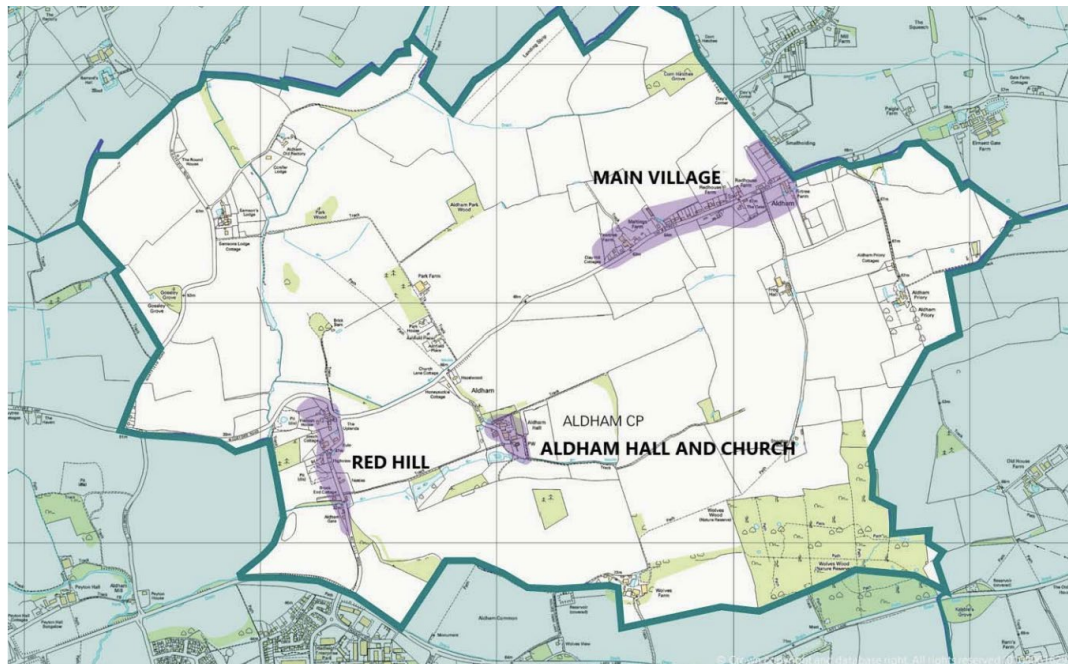
However, paragraphs across the Plan have been amended and brought up-to-date to reflect changes that have occurred since 2020, both in terms of local circumstances and the district and national planning policy context. A separate Schedule of Plan Changes has been submitted to accompany the Plan Review to assist in identifying what has changed since the 2020 Plan.

- 1.12 This is the Submission draft of the Neighbourhood Plan Review. It is now subject to further consultation before being submitted to an independent Neighbourhood Plan Examiner. The Examiner will determine whether the nature and extent of the changes to the 2019 Plan deem it necessary for a parish referendum before the new Plan can be adopted.



2. Aldham in context

- 2.1 The main built-up area of the village is primarily focused as a ribbon along The Street, a minor road without footways or street lighting and reflecting the relatively remote rural nature of Aldham. Elsewhere in the parish there are small groups of dwellings often clustered around historic farms. The most significant group is the cluster at Red Hill and around the junction with Cosford Road, as illustrated on map 2. There is also a small but historically significant cluster around Aldham Hall and The Parish Church.



Map 2 - Main Built-Up Clusters

- 2.2 Aldham is one of the smallest villages in the Babergh district. In 2021 the Census recorded that the village had a population of 183, a 4.5% increase compared with the 2011 Census population. The nature of these changes is illustrated in the age comparison chart in Figure 1. There has been a significant increase in the number of residents aged over 60 while young children has nearly halved.

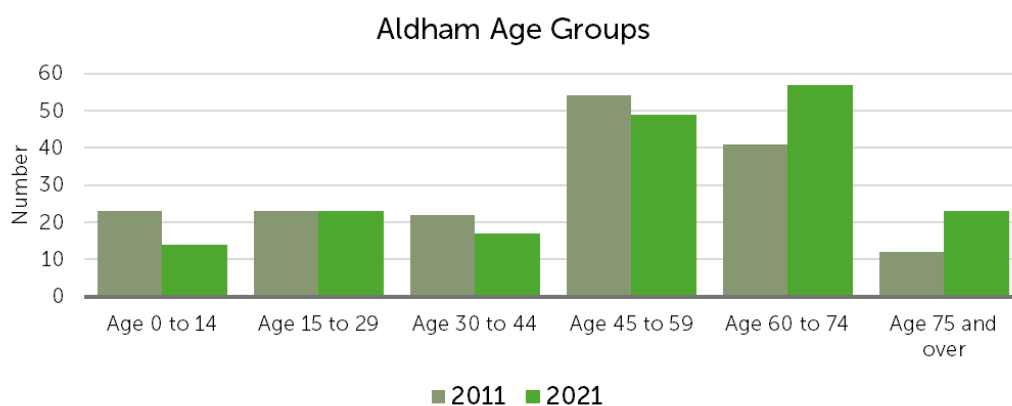
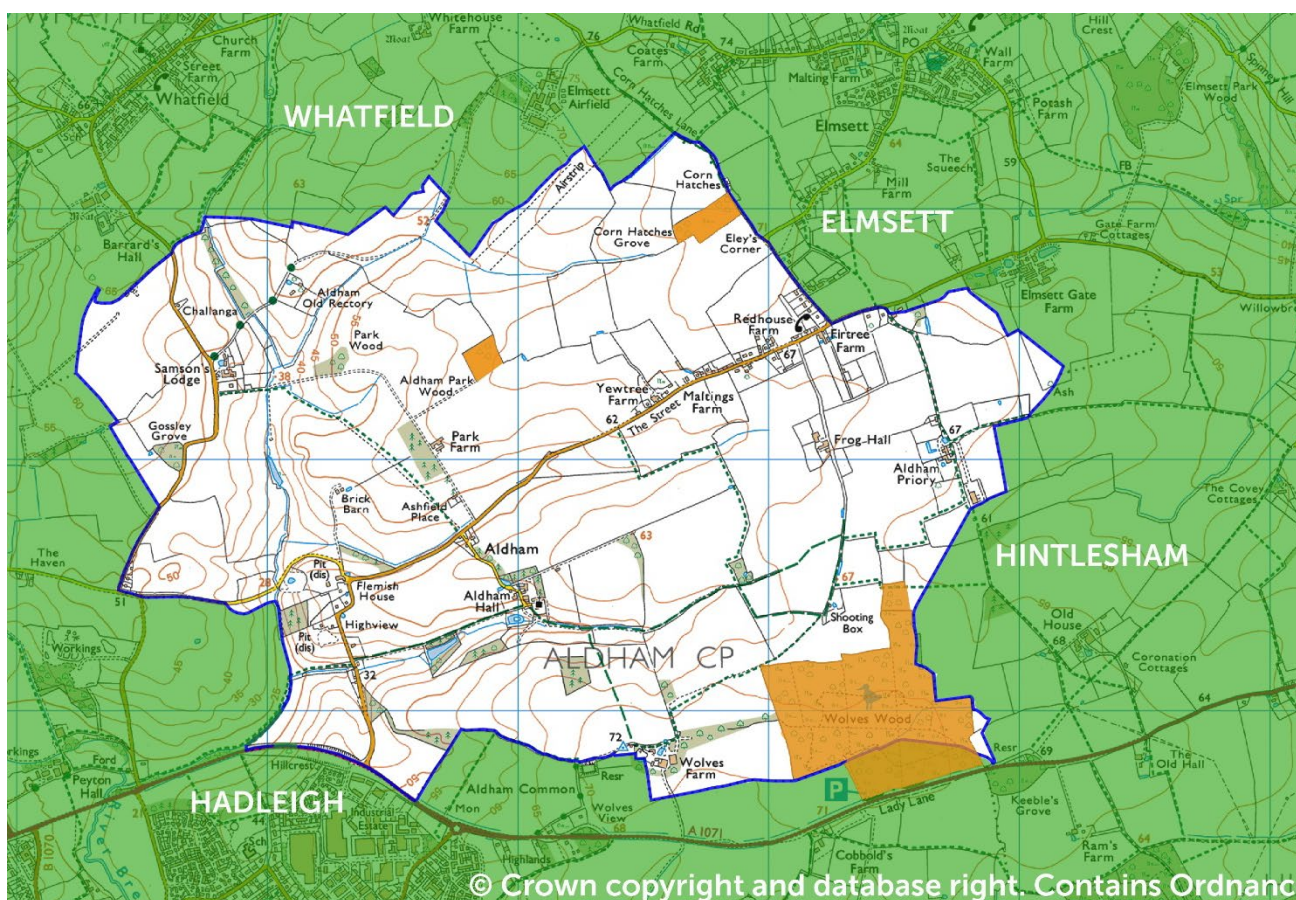


Figure 1 – Age Comparison 2011 and 2021

- 2.3 The 2021 Census identified that there were 76 homes in the parish, and that nearly half of these were larger homes having four or more bedrooms while only ten per cent have two bedrooms. Only three homes had two bedrooms. 2.4 In 2011 just over 90 residents in the village were in employment. The average distance people travelled to work at the times was 12 miles, although nearly 14% worked from home.
- 2.4 In 2021 53% of residents aged 16 or over were in employment, slightly below the rate for Babergh district, while 35% were retired compared with 30% across Babergh.

Landscape and Natural Environment

- 2.5 The central and eastern part of the Plan Area is located relatively high on a plateau with extensive views across the surrounding countryside. The western end is dominated by the steep valley sides of a tributary to the River Brett.
- 2.6 Wolves Wood, on the southern boundary of the village, is a Royal Society for the Protection of Birds (RSPB) reserve. It is one of the few remnants of the ancient woodland which used to cover East Anglia. Records show that there has been woodland here since at least the 1600s and it is designated as a Site of Special Scientific Interest.
- 2.7 Elsewhere in the Plan Area there are further remnants of ancient woodland, namely Aldham Park Wood and Corn Hatches Grove as illustrated on Map 3.



Map 3 – Ancient woodland

- 2.8 Areas in the east and west of the Plan Area were formerly designated as a Special Landscape Area in earlier local plan documents but not carried forward into the Babergh and Mid Suffolk Joint Local Plan (Part 1) 2023.

Historic Environment

- 2.9 There are six Listed Buildings in the Plan Area, the most notable of which is the Grade I Listed Church of St Mary. The Historic England description states that it is a flint church with stone dressings built circa 1340. A circular west tower has a 11th -12th century base. The chancel has a 14th century kingpost roof and there are some 15th century carved benches and a 15th century lectern. The remainder of the Listed Buildings date primarily from the 16th or 17th century as follows:

- Aldham Hall, Church Lane
- Church Lane Cottage, Church Lane
- Flemish House, Red Hill
- Redhill Cottage, Red Hill
- Yew Tree Farmhouse, The Street

There have been a number of archaeological finds in the Neighbourhood Plan Area, including Roman coins and pottery, and Saxon metalwork. Suffolk County Council' Archaeological Service's Historic Environment Record provides details of finds and the Service should be consulted at the earliest possible stages of preparing a planning application.

Access to Services and Facilities

- 2.10 There are no shops or facilities in Aldham and it relies on sharing the use of neighbouring Elmsett's village hall. Elmsett also has a primary school, a newly opened community shop, public house and playing field. It is around 1.5 miles from main population centre of the village. The larger centre of Hadleigh, with a wide range of shops, services and job opportunities is three miles away via narrow roads without pavements. Residents have raised significant concerns at the amount of traffic using the narrow roads that access Aldham. Recent housing development at Elmsett has resulted in more traffic passing through Aldham to get to services and facilities. A Suffolk County Council survey in May 2015 recorded in excess of 1,100 vehicle movements a day along The Street.
- 2.11 The only public transport service to Hadleigh is operated by Hadleigh Community Transport on weekdays with two services to Hadleigh and one return service. The Community Transport initiative also operates a bus to Ipswich on a Thursday, leaving from near the Hadleigh Road / Street junction midmorning and returning at 1.00pm from Ipswich.
- 2.12 At the time of the preparation of the Neighbourhood Plan, broadband speeds in the village were slow and further contributes to the sense of rural isolation experienced by residents.

3. Planning policy context

- 3.1 The Neighbourhood Plan has been prepared in the context of the content of the National Planning Policy Framework (NPPF) and the relevant Local Plan documents that cover the parish. The Plan must have regard to the content of the NPPF and be in general conformity with the strategic policies of the adopted Local Plan. The paragraphs below identify how these are relevant to the Neighbourhood Plan.

National Planning Policy Framework

- 3.2 The National Planning Policy Framework (NPPF) sets out the Government's high-level planning policies that must be taken into account in the preparation of development plan documents and when deciding planning applications. In December 2024 the Government published a Revised NPPF. The Framework sets out a presumption in favour of sustainable development. Paragraph 11 of the NPPF states: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:
- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
 - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".
- 3.3 Paragraph 29 of the NPPF states that: "Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies."The Local Plan

The Local Plan

- 3.4 In November 2023, Babergh District Council adopted a new Local Plan, the Babergh and Mid Suffolk Joint Local Plan - Part 1 [referred to as 'JLP1 in this document]. JLP1 provides a set of strategic and local development management policies, which will be used to inform decisions on planning applications and appeals. These do not need to be repeated here but our Neighbourhood Plan can complement JLP1 by adding locally based detail.

- 3.5 In February 2025 the District Council announced that it would be preparing a totally new Joint Local Plan with Mid Suffolk. The published Local Development Scheme stated that the new Joint Local Plan will cover the period to at least 2044 with consultations commencing in Spring 2026. It is not anticipated that the new Plan will be adopted until 2029.
- 3.6 In July 2020, Suffolk County Council adopted the Minerals and Waste Local Plan which is part of the strategic policy framework for the area. Much of the parish does fall within a Minerals Consultation Area and the District Council will consult the County Council on planning applications that fall within this area.



4. The Plan

- 4.1 The 2020 Plan was prepared to focus purely on housing development. This is because of the situation at the time in Babergh where there was no site allocations local plan document, an adopted Core Strategy that was five years old and little prospect of a new local plan being in place until the end of 2020 at the earliest. In the meantime, although the District Council's Annual Monitoring Report 2017/18 identified a five years housing land supply, it was considered that this was a fragile situation and could leave the Neighbourhood Plan Area vulnerable to speculative and unplanned housing development.

Sustainable Development

- 4.2 There is no legal requirement for a Neighbourhood Plan to be accompanied by a sustainability appraisal. However, those preparing the plan must demonstrate how it contributes to achieving sustainable development. The National Planning Policy Framework states that achieving sustainable development "means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways"

The NPPF objectives are:

- a) 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 coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient range 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
 - c) an environmental objective – 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, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 4.3 In some limited circumstances, a neighbourhood plan is likely to have significant environmental impacts, it may require a strategic environmental assessment. Draft Neighbourhood Plan proposals are therefore assessed to determine whether the plan is likely to have significant environmental impacts. Babergh District Council managed this process as part of their duty to support the preparation of Neighbourhood Plans. A screening opinion of the draft 2020 Plan concluded that neither a Strategic Environmental Assessment or a Habitats Regulations Assessment of the Plan was required. This exercise has been repeated as part of the review process and came to the same conclusions . Copies of the relevant reports and Notices of Determination (both February 2019 and June 2024) are available on the Babergh DC website.

5. Planning Strategy

Context

- 5.1 The planning policy framework for the Parish is established in the adopted Babergh Mid Suffolk Joint Local Plan Part 1 (November 2023) and the 2020 “made” Aldham Neighbourhood Plan. The latter defines Built Up Area Boundaries. The term “Built Up Area Boundary” has been superseded in the Joint Local Plan and they are now known as Settlement Boundaries.
- 5.2 The principle of development within Settlement Boundaries is accepted, in principle, while there is a general presumption against development outside them, unless this is allowed for by national or specific local policies. The level of services and facilities in the village as well as the limited accessibility to higher order settlements means that only limited housing growth is appropriate in the village over the period of the Plan. It is, however, essential that the growth is focused on the existing built-up area of the village where there is a close relationship with accessibility of the existing services and facilities.
- 5.3 Part 1 of the Joint Local Plan does not define a settlement hierarchy across Babergh nor allocate sites for development. These matters will now be addressed in the new Joint Local Plan which is not expected to be completed until 2029. As such, there is no housing requirement for Aldham that the Neighbourhood Plan has to meet.
- 5.4 Policy SP03 of the Part 1 Joint Local Plan sets out where new development would be supported, but the approach is very high level with general references to windfall development in accordance with the policies in Neighbourhood Plans or elsewhere in the Joint Local Plan.

Settlement Boundaries

- 5.5 The Neighbourhood Plan Review confirms the Settlement Boundaries of the 2020 Plan.
- 5.6 In accordance with Policy SP03 of the Joint Local Plan, the spatial strategy for Aldham supports the principle of development within the defined settlement boundaries, including the sites allocated for housing in the 2020 Neighbourhood Plan, subject to the consideration of the impact of the proposal as assessed against other policies in the Joint Local Plan – Part 1 and Neighbourhood Plan, such as
- the presence of heritage assets;
 - the landscape setting of the village;
 - the capacity of services and infrastructure;
 - the potential impact on the amenity of existing residents; and
 - the impact of development on the wider area.

This approach will ensure that the largely undeveloped countryside will remain preserved.

- 5.7 There may be situations where it may be adequately demonstrated that it is necessary for development to take place outside the Settlement Boundaries. However, this will be limited to that which is specifically supported by the NPPF, Joint Local Plan - Part 1 and the Neighbourhood Plan. Table 5 of the Joint Local Plan - Part 1 identifies the policies permitting development outside settlement

boundaries, subject to the development's accordance with the other relevant policies of the Plan.

Policy ALD 1 – Spatial Strategy

The Neighbourhood Area will accommodate development commensurate with the policies of the adopted Babergh and Mid Suffolk Joint Local Plan - Part 1. The focus for new development will be within the defined Settlement Boundaries, as shown on the Policies Map, where the principle of development is accepted.

Proposals for development located outside the Settlement Boundaries will only be permitted where they are in accordance with national, district and neighbourhood level policies and where they would not have a detrimental impact on infrastructure capacity, and heritage and landscape designations.



6. Housing

- 6.1 A key role of the Neighbourhood Plan is to identify the amount of new housing to be provided during the period covered by the Plan and to identify where it will be located. In September 2018 ahead of the 2020 Plan been prepared, the government published revised National Planning Guidance that stated that “the ‘policies and allocations’ in the plan should meet the identified housing requirement in full, whether it is derived from the standard methodology for local housing need, the housing figure in the area’s strategic policies, an indicative figure provided by the local authority, or where it has exceptionally determined by the neighbourhood planning body.” In other words, and without any further guidance being published at that time, there were four options for identifying the “housing requirement”. The following paragraphs provide consideration of the available evidence at that time to identify the housing requirement for the 2020 Aldham Neighbourhood Plan.
- 6.2 When the original Neighbourhood Plan was prepared, the housing figures in the strategic policies are those in the adopted Babergh Core Strategy (2014). A more up-to-date indicative figure had not been provided by Babergh District Council. The Joint Local Plan was at an early stage in its preparation and the numbers identified for Aldham in the July 2019 Preferred Options Joint Local Plan could not be relied upon given the early stage of the Local Plan preparation process.
- 6.3 The former Core Strategy allocated 1,050 new homes to Core and Hinterland villages in the period to 2031. All of these had either already been built or had planning permission at the time of preparing the 2020 Neighbourhood Plan. Therefore, the Core Strategy did not require additional allocations in this Neighbourhood Plan to meet its growth strategy to 2031. Furthermore, at 1 April 2018, Babergh District Council could demonstrate a five years supply of housing sites across the district and there was, therefore, no need to identify additional sites to overcome the short-term shortfall.
- 6.4 However, given the changing circumstances at the time in terms of the local plan and the extended period of the neighbourhood plan, it was considered appropriate to review the amount of growth that was predicted in Babergh over the Neighbourhood Plan period and the potential for Aldham to contribute an appropriate amount of this growth. Appendix 1 of the 2020 Neighbourhood Plan included a calculation for the amount of housing required in Aldham in the period to 2036. It used the Government’s “standard methodology” referred to in the 2018 NPPF using the Government’s 2014 Household Projections as requested by the Secretary of State in an announcement in October 2018.
- 6.5 The calculation in the 2020 Plan suggested that the residual requirement for the Neighbourhood Plan, as at 1 April 2018, was between 3 and 8 homes in the period to 2036. However, given that seven dwellings already had planning permission at that time and that they were likely to be developed in the short term, it was considered essential to make provision for further housing development over the longer-term life of the Neighbourhood Plan. The 2020 Neighbourhood Plan therefore provided for around 15 new homes in the village between 2018 and 2036, including the seven above. The new homes

requirement would be delivered through a number of approaches as identified in the following paragraphs.

- 6.6 Two sites were allocated in the 2020 Neighbourhood Plan that were expected to come forward during the period to 2036. They are carried forward in this Review, identified in specific policies (ALD 3 and ALD 4) and on the Policies Map and are expected to deliver 12 homes in total.
- 6.7 There will continue to be opportunities within the Settlement Boundaries for small “windfall” sites to come forward as a result of, for example, redevelopment or plot rationalisation. It will, however, be essential that such proposals have regard to the characteristics of the local environment including the presence of designated or non-designated heritage assets, any impact on the amenity of nearby residents and the ability to achieve a safe access onto the highway.
- 6.8 Outside the Settlement Boundaries, there will occasionally be opportunities to convert existing buildings, such as barns, to residential use. In some circumstances, planning permission is not required for such conversions, but the schemes do help to contribute to meeting the housing need of the area. Occasionally, works that are required to existing buildings to make them suitable for residential use can have a detrimental impact on the character of the building and its setting within the countryside. The Neighbourhood Plan, while allowing in principle works to convert buildings in the countryside to residential uses, seek to limit the impact of proposals especially on the setting or significance of listed buildings or any potentially curtilage listed buildings.
- 6.9 Limited opportunities might exist for single plot infill development within the curtilages of dwellings subject to overcoming any potential impacts on the environment, residents’ amenity and demonstrating that the proposal would not result in an isolated dwelling in the countryside as defined by paragraph 84 of the NPPF.
- 6.10 Combined, and in accordance with the requirements National Planning Guidance, these approaches to the delivery of residential development will meet the identified housing requirement in full.

Policy ALD 2 – Housing Development

This Plan provides for around 15 dwellings to be developed in the Neighbourhood Plan area between 2018 and 2036. This growth will be met through:

- i) the allocation of sites as identified in separate policies in Plan and on the Policies Map; and
 - ii) small “windfall” sites and infill plots of one or two dwellings within the Settlement Boundaries that come forward during the plan period and are not identified in the Plan; and
 - iii) conversions and new development opportunities outside the Settlement Boundaries in accordance with paragraph 84 of the NPPF.
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Land west of Hadleigh Road

- 6.11 Proposals for a site west of Hadleigh Road (Elmsett Road) were registered with Babergh District Council in March 2018. The scheme consisted of seven detached dwellings and the application form suggested that the development

would comprise primarily of four-bedroomed bungalows with two three-bedroomed bungalows. The scheme would, therefore, further exacerbate the shortage of smaller dwellings in the village. Despite objections from the Parish Council, the District Council concluded that "The proposed development is not considered to result in any significant adverse impact on highways safety, residential amenity, heritage assets, the environment or biodiversity interests to warrant refusal." Planning consent was therefore granted on 13 June 2018.

- 6.12 This Neighbourhood Plan cannot revoke the planning permission and, because it was granted after 1 April 2018, it is therefore allocated in the Plan and contributes towards the housing needs of the village to 2036. The planning permission included a number of matters that the development would need to address, and these are included in Policy ALD 3 to ensure that, should the permission lapse, the matters are addressed in any future relevant applications.



Map 4- Land west of Hadleigh Road Planning Permission

Policy ALD 3 – Land west of Hadleigh Road

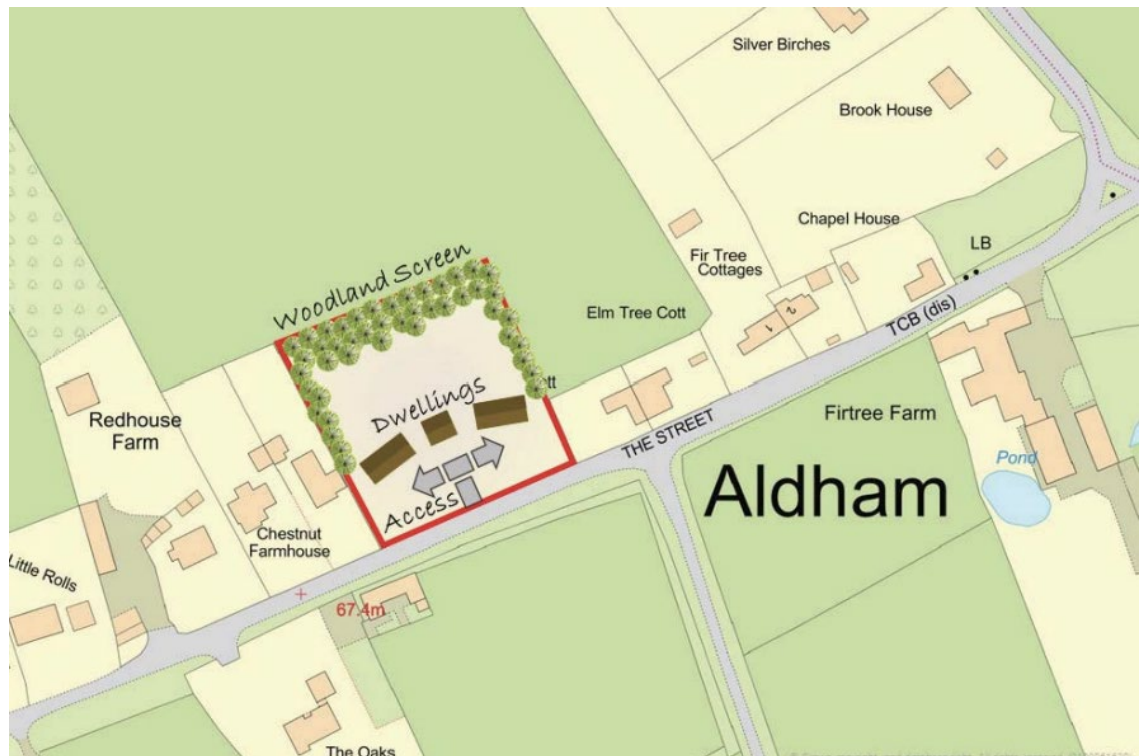
Land to the west of Hadleigh Road, as identified on the Policies Map, is allocated for approximately seven single storey dwellings as permitted by Babergh District Council in June 2018 (Ref DC/18/00799). Detailed proposals for this site should:

- i) retain the existing trees and hedgerows along the boundaries of the site;
 - ii) provide new screen planting of native species on the western boundary;
 - iii) where necessary, having regard to the emerging Suffolk Coast Recreational Avoidance and Mitigation Strategy, contribute towards or deliver measures identified through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive; and
 - iv) have regard to the setting and significance of the adjacent listed building in order to retain a sense of existing isolation and relationship to the surrounding rural environment.
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Land north of The Street

- 6.13 In addition to the allocation west of Hadleigh Road, and in order to ensure that the housing requirement for the period to 2036 is fully met, an additional site is identified for development north of The Street. The site forms part of a much larger one originally submitted to Babergh District Council as part of a call for sites suitable for potential inclusion in the emerging Joint Local Plan. The larger site was discounted by Babergh for inclusion in the Joint Local Plan because it was too big but in the 2017 Local Plan consultation it was suggested that a smaller site that delivered five dwellings might be suitable.
- 6.14 Having given careful consideration to the longer-term needs of the village and taking into account the feedback from the community consultation event in July 2018, a site fronting onto The Street is allocated for five dwellings for development no earlier than 2026. This delay is made on the basis that a permission already exists for seven dwellings at Hadleigh Road (Policy ALD3) and that there is a need to continue the long-term trend of limited and small-scale growth in the village over the lifetime of the Plan through development that is more likely to meet a “proven local need”.
- 6.15 Given the identified need for smaller homes in the village, the development will be limited to dwellings that provide a mix of two and three bedroomed homes that, as identified in Map 5, should include semi-detached properties in order to avoid an over-developed frontage that would be out of character with the surrounding area. It is also important that a substantial belt of screen planting using native species is delivered at the rear of the site in order to minimise the impact of the development on the countryside.
- 6.16 As the site lies within 13 kilometres of the Stour and Orwell Estuaries Ramsar site, additional residential development could result in detrimental recreational impacts on the designated site. Suffolk Coast Recreational Avoidance and Mitigations Strategy (Suffolk RAMS) has been prepared by a partnership including Babergh District Council and it may be necessary for proposals on this site to contribute towards or deliver measures through project level HRAs, or otherwise,

to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.



Map 5 – Policy ALD4 Site Concept Plan

Policy ALD 4 – Land north of The Street

A site of approximately 0.3 hectares as shown on the Policies Map north of The Street is allocated for a mix of five, two and three bedroomed dwellings;

The development will not be permitted to be commenced before 2026.

Detailed proposals for this development should have regard to the Site Concept Plan illustrated on Map 5 and:

- i) provide appropriate screen planting of a type to be agreed on the northern, eastern and western boundaries and:
 - ii) where necessary, having regard to the Suffolk Coast Recreational Avoidance and Mitigation Strategy, contribute towards or deliver measures identified through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.
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Affordable Housing

- 6.17 The latest published government figures identify that the median house prices in Babergh are 10 times the median gross annual earnings of residents. This is having a huge impact on the ability of people to buy housing, especially those on lower incomes. Affordable housing provides a potential accommodation solution for those that need to live in the villages but are unable to access open market price housing. The adopted Local Plan policy for affordable housing requires new developments on sites of over ten houses to provide up to 35% of the total as housing that meets the "affordable" definition (see Glossary). However, the allocations in this Plan mean that there is no mechanism for delivering affordable housing in the village as part of a larger development.
- 6.18 One way to provide affordable housing which will meet identified local needs is through granting planning permission on an exceptional basis for affordable housing on land next to but outside the defined Built-Up Area Boundary. This approach has already delivered a number of homes for local people in neighbouring Elmsett in the past. Where a "rural exception" site is proposed for development, it must be demonstrated that there is an identified local need in the village and that the site is suitable to meet that local need. A Housing Needs Survey has not been undertaken in preparing the Neighbourhood Plan and it is not considered that, at this time, a substantive need exists that would warrant the provision of an affordable housing scheme to meet local needs in the village.

- 6.19 It is therefore important to have a policy in place to enable such development to take place. In exceptional circumstances, it may be appropriate to permit an element of open market housing to facilitate the delivery of the affordable housing. This is in accordance with paragraph 76 of the NPPF, which states that local authorities should consider whether this approach would help provide additional affordable housing. The exceptional circumstances, where a small number of market homes will be permitted could include, for example, where there is insufficient government grant available and it is demonstrated, through financial appraisal, that the open market housing is essential to enable the delivery of the affordable housing. In these cases, the applicant would need to demonstrate, to the satisfaction of the District Council, that the inclusion of open market housing is the minimum necessary to enable the delivery of the affordable housing and is not being developed to generate uplift in land values for the landowner. This could be demonstrated through the provision of affordability/profitability modelling data/ Where an element of open market housing is proposed as part of an affordable housing exception site, it should be sympathetic to the form and character of the settlement and in accordance with local needs. Local needs can vary, and it could be that smaller market homes are required to meet the needs of first-time buyers or people wishing to downsize to a smaller home. This would need to be established at the time in consultation with the District Council's Housing Service.

Policy ALD 5 – Affordable Housing on Rural Exception Sites

Proposals for the development of small-scale affordable housing schemes, including entry level homes for purchase (as defined by paragraph 71 of the NPPF) on rural exception sites outside the main village Settlement Boundary, where housing would not normally be permitted by other policies, will be supported where there is a proven local need and provided that the housing:

- i) remains affordable in perpetuity;
- ii) is for people that are in housing need by virtue that they are unable to buy or rent properties in the villages at open-market prices;
- iii) is offered, in the first instance, to people with a demonstrated local connection, as defined by the Babergh Choice Based Lettings Scheme. Where there is no local connection, a property should then be offered to those with a demonstrated need for affordable housing in neighbouring villages.

These restrictions should be delivered through a legal agreement attached to the planning consent for the housing. Applications for such development will be considered in relation to the appearance and character of the surrounding area, the potential impact on residential amenity and highway safety. To be acceptable, proposals should demonstrate that a local need exists which cannot be met by applying normal planning policy for the provision of affordable homes in association with the market housing. Any assessment and the accommodation proposed should contribute to meeting this proven need. In exceptional circumstances, a small number of market homes will be permitted where demonstrated that these are financially essential to facilitate the delivery of affordable units.

7. Open Space

7.1 Paragraph 106 of the NPPF states that “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.” Paragraph 107 states that the designation should only be used where the green space is:

- in reasonably close proximity to the community it serves;
- demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- local in character and is not an extensive tract of land.

It is recognised that the designation of Local Green Spaces (LGS) should not be used simply to block development.

7.2 Background work undertaken during the preparation of this Neighbourhood Plan has identified one site that qualifies for designation as a Local Green Space, Pump Green on The Street. The area is identified on the map below.

7.3 The table below identifies how the space meets the NPPF criteria.

Local Green Space Assessment

Site Details	
Description and purpose	Green adjoining southern side of The Street
Checklist	
Are there any statutory designations?	Designated Common Land
Is the site designated for any purpose in the Local Plan	No
Are there any current planning permissions on the site?	No
What is the Site Area?	0.1 hectares
Who owns it?	Parish Council
NPPF Criteria Assessment	
Is it close to the community is services?	Within main built-up area of Aldham
Is there public access?	Yes. Direct access from The Street
Is there any ecological significance?	None known, but hedgerows on southern boundary
Is it historically significant?	Not known
Is it demonstrably special to the local community and hold a particular local significance?	The green provides the location for the Parish Noticeboard

Is it local in character and is not an extensive tract of land (less than 2.5 hectares)	Yes
Conclusion: Does the site meet the LGS criteria?	Yes – Designate as Local Green Space



Map 6 – Pump Green Local Green Space

Policy ALD 6 – Local Green Space

Pump Green, The Street, as identified on the Policies Map, is designated as Local Green Space.

Development on this site will only be permitted in very special circumstances. Permitted development rights, including the operational requirements of infrastructure providers, are not affected by this designation.

8. Mitigating the impact of development on protected habitats

- 8.1 Aldham is located within 13 kilometres of the Stour and Orwell Special Protection Area (SPA) and Special Area of Conservation (SAC). Unless mitigated against, Natural England consider that additional residential development within the 13 kilometre “Zone of Influence” could have a detrimental impact on the designations due to an increase in residential trips. An emerging strategic solution, the Suffolk Recreational Avoidance and Mitigation Strategy (Suffolk RAMS) is a key consideration in the context of the Habitats Regulation Assessment for development proposals. The Suffolk RAMS seeks to mitigate the recreational impacts as a result of new development within the Zones of Influence (Zoi). At the time of the preparation of this Neighbourhood Plan, the RAMS had not been completed and, in the interim period, residential development within the zone of influence will need to deliver measures identified through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.
- 8.2 Development proposals that incorporate into their design features which provide gains to biodiversity will be supported. Landscaping and planting should, where feasible, encourage wildlife, connect to and enhance wider ecological networks, and include nectar rich planting for a variety of pollinating insects. Divisions between gardens, such as walls and fences, should still enable movement of species, such as hedgehogs, between gardens and green spaces. Existing ecological networks should be retained.

Policy ALD 7 – Recreational Disturbance Avoidance and Mitigation

All residential development within the zones of influence of European sites will be required to make financial contributions towards mitigation measures, as defined in the Suffolk Recreational, disturbance Avoidance and Mitigation Strategy (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 Habitat Regulations Assessments, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.



Glossary

Affordable Housing: The NPPF defines Affordable Housing as “housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers), and which complies with one or more of the following definitions:” Definitions are set out for a) affordable housing for rent; b) starter homes; c) discounted market sales housing; and d) other affordable routes to home ownership.

Biodiversity: Describes the range and variety of living organisms within an ecosystem. It can include all living organisms, plants, animals, fungi and bacteria and is often used to indicate the richness or number of species in an area. Such an area can be defined at different levels across the globe or be limited to a local area such as a parish.

Development Plan: This includes adopted Local Plans and Neighbourhood Plans as defined in section 38 of the Planning and Compulsory Purchase Act 2004.

Hinterland Village: Defined in the Babergh Core Strategy 2014 as villages that tend to be small, with very limited facilities and so are dependent on nearby larger villages or urban areas for many of their everyday needs.

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Local planning authority: The public authority whose duty it is to carry out specific planning functions for a particular area which in this case is Babergh District Council.

Local Plan: The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community.

Neighbourhood Plans: A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Rural exception sites for affordable housing: Sites for affordable housing development in rural locations where market housing would not normally be acceptable because of planning policy constraints. Homes can be brought forward on these sites only if there is a proven unmet local need for affordable housing and a legal planning agreement is in place to ensure that the homes will always remain affordable, will be for people in housing need and prioritised for those with a strong local connection to the parish.

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

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

Site of Special Scientific Interest: Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Strategic Environmental Assessment: A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

Appendix 1 – Housing Calculation

In the absence of an up-to-date housing requirement at the district level and any indicative figure for Aldham being provided by Babergh, the following methodology was used to calculate a requirement for the 2020 Neighbourhood Plan. It used the Government's 2014 Household Projections as requested by the Secretary of State in an announcement in October 2018. A base date of 1 April 2018 was used for this Plan as it reflected the most recent land availability data available when work on the Neighbourhood Plan commenced.

The calculation for Babergh district is shown below.

a) Projected household growth 2014 – 2036	6,000
b) Annual average growth	318 dwellings per annum
c) Adjustment for market signals * b x 1.43	
d) Adjusted annual requirement	455
e) Total requirement 2014 – 2036	10,010

* Based on comparison of median house prices to median workplace earnings

f) Completions 2014 – 2018	866
g) Permissions not completed at 1 April 2018	4,377
h) Additional sites required across Babergh 2018 – 2036 (e-f-g)	4,750

The conclusions of this calculation are that there is a need to find new sites for at least 4,750 homes across Babergh district as of April 2018. Any consequent permissions granted since that time will be deducted from that figure.

The August 2017 Joint Local Plan consultation proposed a range of growth across Hinterland Villages of between 5% and 15% of the housing requirement. Notwithstanding the belief that Aldham should be designated as a Hamlet in the emerging Joint Local Plan, the 2020 Neighbourhood Plan applied the net requirement calculated above to the August 2017 options, based upon the proportion of the population in the village compared with the total of all proposed Hinterland Villages in Babergh.

Hinterland Housing Requirement based on Joint Local Plan Options – August 2017

	2011 population	% population of Hinterland Villages		Option BHD1 – Hinterland villages 5%	Option BHD2 – Hinterland Villages 15%	Option BHD3 - Hinterland Villages 10%	Option BHD4 – Hinterland villages 5%
All hinterland villages	15,677			238	713	475	238
Aldham	175	1.1		3	8	5	3