

ALDHAM NEIGHBOURHOOD PLAN FOCUSED REVIEW

Consultation Statement
May 2025



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1. Introduction

- 1.1 This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012 in respect of the Aldham Neighbourhood Plan Focused Review.
- 1.2 The legal basis of this Consultation Statement is provided by Section 15(2) of the 2012 Neighbourhood Planning Regulations, which requires that a consultation statement should:
 - contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - explain how they were consulted;
 - summarise the main issues and concerns raised by the persons consulted; and
 - describe how these issues and concerns have been considered and, where relevant addressed in the proposed neighbourhood development plan.

2. Background to the preparation of the Neighbourhood Plan Review

- 2.1 In January 2020, following a successful Parish Referendum, the Elmsett Neighbourhood Plan was adopted by Babergh District Council. It was the culmination of two years' work by a team of volunteers working on behalf of the Parish Council. During this time the team had prepared background documents, conducted surveys and written and consulted on the form and content of the Plan.
- 2.2 Following the adoption of the Babergh and Mid Suffolk Joint Local Plan (Part 1), the Parish Council identified that there was a need to update one of the key policies of the Plan - Policy ALD 1 'Spatial Strategy' – to ensure that it is in conformity with the strategic policies of those in the Local Plan.
- 2.3 At the same time, an opportunity was taken to update the factual content of the Plan to reflect the changing circumstances in the parish, the publication of the 2021 Census and the national and local planning policy context.

3. Regulation 14 Pre-Submission Consultation

- 3.1 Given the scale of change to Policy ALD 1, a full "pre-submission" consultation in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. In March 2024 the Parish Council approved the wording of a draft revised Policy ALD1, together with amended wording of Plan chapter 3 'Planning Policy Context' and chapter 5 'Planning Strategy' were approved for the purposes of consultation.
- 3.2 Pre-submission consultation on these matters commenced on 23 March 2024 and lasted until 13 May, a period of seven weeks. An 8 page leaflet setting out the proposed changes was circulated to every household and business in the parish. The leaflet is included as Appendix 1 of this Statement.
- 3.3 The consultation was also launched with drop-in event held at the parish Church on 23 March which was advertised on the leaflet. The display boards for the drop-in event are included as Appendix 2 of this Statement.

- 3.4 At the start of the consultation, all the statutory Regulation 14 consultees, as advised by Babergh District Council, were consulted. The full list of bodies consulted is shown in Appendix 3 and the email content used to notify them is included at Appendix 4.

4. Pre-Submission Consultation Responses

- 4.1 A total of 18 people or organisations responded to the Pre-Submission Consultation as identified below.

D Watts	Suffolk and Essex National Landscape Team
L Nichols	Water Management Alliance
J Ralph	Historic England
A Laflin	Natural England
P Boswell	Environment Agency
C Squire	National Highways
Dr & Mrs K Irwin	Anglian Water
Mr & Mrs J Bray	Dedham Vale Society
	Suffolk County Council
	Babergh District Council

- 4.2 Appendix 5 of this Statement provides a summary of responses to the consultation questions while the schedule of comments and the responses of the Parish Council are set out in Appendix 6. As a result, the Submission version of the Neighbourhood Plan has been appropriately amended as identified in the "changes made to Plan" columns of the Appendix.
- 4.3 The opportunity was taken to update the general content of the Plan. These changes do not make policy changes to the Plan. A separate document accompanies the Submission Focused Review Plan entitled 'Schedule of Changes to the 'made' Neighbourhood Plan to be incorporated into the Neighbourhood Plan Focused Review'

Appendix 1 – Consultation Leaflet



**Aldham Neighbourhood
Plan Review
Public Consultation
March 2024 Aldham Parish Council**

WE NEED YOUR COMMENTS

The Parish Council has decided to carry out a Focused Review of the 2020 Neighbourhood Plan to bring it in line with the new policies for the location of development across Babergh and with those in other neighbourhood plans.

In a nutshell, we are amending two of the eight chapters of the 2020 Neighbourhood Plan to bring it up-to-date and bring the policy that determines where new development can take place in line with national and district policies.

Drop-in Information Event

We're holding a drop-in information event at the Parish Church on Saturday 23 March between 10.00am and 3.00pm. It will provide you with an opportunity to find out more about the Focused Review. Refreshments will be available.

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, there is now 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 current Aldham Neighbourhood Plan states 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 (Settlement Boundary)."

The consequence of the adoption of the Local Plan is that our Neighbourhood Plan policy is now "out of sync" with many other neighbourhood plans across Babergh. As a result, Aldham could come under pressure for further housing development outside the Settlement Boundary if a developer can demonstrate to the District Council that a "local need" exists.

THIS CONSULTATION

The Review effectively replaces Chapter 's 3 (Planning Policy Context) and 5 (Planning Strategy) of the 2020 Plan with new and up-to-date chapters that will, if approved, bring our neighbourhood plan in-line with the newly adopted Local Plan and reduce the pressure for speculative development outside our settlement boundaries.

In a nutshell, we are amending two of the eight chapters of the 2020 Neighbourhood Plan to bring it up-to-date and bring the policy that determines where new development can take place in line with national and district policies.

Elsewhere in the Neighbourhood Plan, reference is made to the 2018 version of the National Planning Policy Framework. The most recent version of this was published in December 2023 and the references will also be updated in the Review.

This leaflet sets out the current Chapters 3 and 5 and the proposed new Chapters.

**We are now consulting on the changes for a period of just over 6 weeks.
We need your comments by 13 May 2024.
The back page identifies how you can comment.**



2020 Neighbourhood Plan Policy

Policy ALD1 – Spatial Strategy

The Neighbourhood Plan area will accommodate development commensurate Tom's designation in the settlement hierarchy and taking into account the specific characteristics of the plan area including the availability of infrastructure, services and facilities and the local transport network. The focus for new development will be within the defined Built-Up Area Boundary, as defined on the Policies Map.

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.

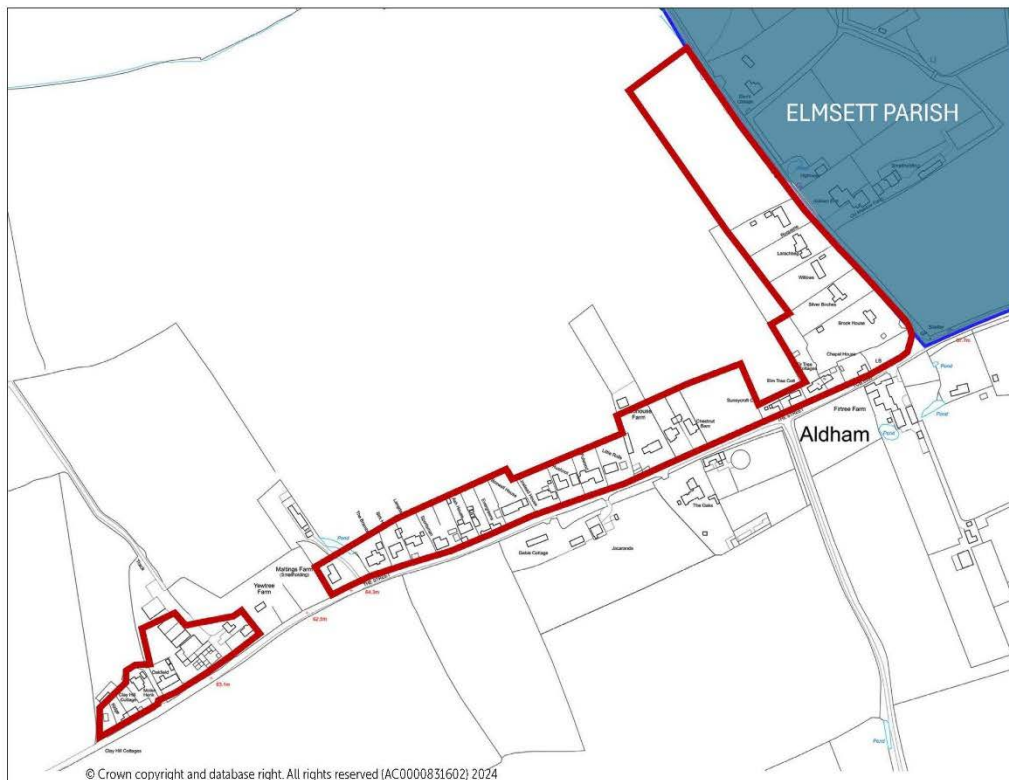
Proposed new Policy

Revised Policy ALD1 – 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.



Settlement Boundaries as defined in the 2020 Plan

3. PLANNING POLICY CONTEXT

- 3.1 The regulations governing the preparation of Neighbourhood Plans require that they conform with the NPPF and the strategic policies of the local development plan. In July 2018 the Government published a Revised NPPF.
- 3.2 The NPPF requires that communities preparing Neighbourhood Plans should:
- Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development.
 - Plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.
- 3.3 At a more local level, the Plan has been prepared in the context of the current status of the Babergh Local Plan, which comprises the Core Strategy and the "saved policies" of the 2006 Babergh Local Plan. Babergh District Council adopted a Core Strategy in February 2014. It provides the current strategic planning framework for Aldham which this Neighbourhood Plan has had regard to. These documents are collectively referred to as "the local plan" in this document. In 2015 Babergh District Council announced their intention to produce a new Joint Local Plan (the emerging local plan) with Mid Suffolk District Council that would provide a planning framework for the management of growth across the two districts to 2036. In August 2017 a consultation document was published but as of January 2019 a draft Local Plan had yet to be published for consultation. It is considered unlikely that the emerging local plan will be adopted before the Neighbourhood Plan is "made" by the District Council. As such, the Neighbourhood Plan has been prepared to conform with the policies in the adopted local plan documents, while having regard to the status and content of the emerging local plan.
- 3.4 The adopted Core Strategy identifies a hierarchy of settlements ranked according to their size and the services they provide. The Core Strategy recognises that there are several larger villages (core villages) that provide a range of services and facilities for a cluster of villages around them. It identifies Aldham as a "hinterland village" within the "functional cluster" of Hadleigh, acknowledging that Hadleigh provides a range of services and facilities to meet many of the needs of Aldham's residents, albeit that the only realistic way to get to Hadleigh is by car. In so far as Aldham is concerned, the saved policies of the 2006 Local Plan and the policies in the Core Strategy are those by which planning applications will be judged until replaced by a new local plan.
- 3.5 In 2015 the District Council commenced the preparation of a new joint local plan in conjunction with Mid Suffolk. In July 2019 the Preferred Options Draft Joint Local Plan was published for consultation. The Preferred Options document proposed designating Aldham as a Hamlet Village, a change from the proposed designation as a Hinterland Village in the previous (August 2017) Joint Local Plan consultation. The Hamlet Village designation reflects the lack of services and facilities in Aldham, the poor road links and the lack of public transport. The consultation document also identified a minimum requirement of 13 additional dwellings to be provided for in the Neighbourhood Plan between 2018 and 2036.

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 2023 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**
- 3.4 At a more local level, the Neighbourhood Plan has been prepared in the context of the current Babergh Local Plan, which comprises the Babergh and Mid Suffolk Joint Local Plan - Part 1, adopted in November 2023 and referred to as JLP1 in this Neighbourhood Plan. It 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 in the Neighbourhood Plan but which the Neighbourhood Plan can complement by adding locally based detail.
- 3.5 Part 2 of the Joint Local Plan is to be prepared during the coming years, with adoption currently scheduled for Autumn 2026. It will identify a settlement hierarchy for the two local authority areas, the distribution of any further housing growth

3.6 At this time the Joint Local Plan is at a very early stage of preparation and, therefore, is not a matter that has been given weight in the preparation of this Neighbourhood Plan.

3.7 Given the status of the Joint Local Plan and the fact that the Neighbourhood Plan has been completed before the Joint Local Plan is adopted, regard has been had to the adopted Babergh development plan documents in preparing this Plan while not seeking to contradict the emerging strategic policies of the Joint Local Plan.

and identify any sites required to meet that growth. At the time of preparing the Neighbourhood Plan, the District Council had commenced a "call for sites" that landowners/developers would like to be considered for allocation in Part 2.

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.

2020 Neighbourhood Plan Chapter 5

5.1 As noted above, the planning policy framework for Babergh is currently evolving from that which is set out in the Core Strategy (2014) to a new Joint Local Plan for Babergh and Mid Suffolk districts. The Neighbourhood Plan has been prepared ahead of the Joint Local Plan being adopted and the strategy for the village is based on the continuation of the Hinterland Village designation as designated in the current adopted Core Strategy.

5.2 Core Strategy Policy CS2 designates Aldham as a Hinterland Village which will: "accommodate some development to meet the needs within them" and where "All proposals will be assessed against Policy CS11."

5.3 Core Strategy Policy CS11 has three key strands to it that are relevant to setting the policy context to the Aldham Neighbourhood Plan. In summary, it states that development proposals will be approved where:

- i. proposals score positively when assessed against Policy CS15;
- ii. a series of matters identified in the policy are addressed; and
- iii. proposals are able to demonstrate a close functional relationship to the existing settlement sites.

The sites identified for development in this Neighbourhood Plan satisfy these criteria.

5.4 A central principle of the Neighbourhood Plan is to support only limited development in Aldham that:

- is consistent with the lack of services and facilities;
- takes account of the very narrow access roads to larger centres; and
- ensures that it will not have an irreversible impact on the characteristics of this small and remote village.

Aldham has been in receipt of a very limited amount of development in previous years and a continuation of this approach will ensure that the essential and distinct characteristics of the village are maintained. It is, however, essential that the growth is focused on the existing main built-up area of the village in order to avoid sporadic and isolated development that would be detrimental to the rural nature of the area.

5.5 A Built-Up Area Boundary (BUAB) is defined for the main built-up area of the village in order to manage the location of future development and limit unjustified development outside the boundary. The boundary is based on that contained in the 2006 Local Plan but has been reviewed to reflect recent changes and opportunities for new development that will arise during the Neighbourhood Plan period. In order to manage the

Proposed Replacement Chapter 5

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 are being addressed in the emerging Part 2 of the Joint Local Plan, planned for completion in 2026. 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

potential impacts of growth, new development will be focused within the BUAB. This will ensure that the undeveloped rural countryside is preserved and remains largely undeveloped.

- 5.6 Policy CS11 of the Babergh Core Strategy allows, subject to certain considerations, limited growth to take place adjoining but outside the BUAB. This was the case when the District council approved seven dwellings on Hadleigh Road despite the Parish council objections. However, given the lack of services and facilities in the village, and the fact that this Plan sets out how it meets the identified housing needs in full (as referred to in Paragraph 97 of the Government's Planning Practice Guidance) there will be no local identified need for further housing development outside the BUAB other than allowed for in this Plan.
- 5.7 Such development would only reinforce the ribbon nature of the village by extending the housing along the roads and would have a detrimental impact on the nature and form of the settlement. It could also erode the small but important gap that separates Aldham and Elmsett villages. There may be situations where it can be demonstrated that it is necessary for development to take place away from the BUAB, but this will be limited to that which can satisfactorily demonstrate that there is an identified need for the proposal and that it cannot be satisfactorily located within the BUAB. However, this approach does not restrict the conversion of agricultural buildings to new uses where proposals meet the government regulations and local planning policies for such conversions.

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.

For the purposes of this consultation, market housing schemes outside the Settlement Boundary would not be supported by the Joint Local Plan.



What next?

Once this consultation is complete, the Parish Council will review the comments and submit the Review to Babergh District Council. The District Council will then carry out further consultation and submit the Review documents and comments to an Independent Examiner. The Examiner will decide whether any changes are required and whether the Review needs to be the subject of a Parish Referendum. At this stage the Parish Council feels that a further Referendum will not be necessary. When the Review is complete, the new policy will be used when planning applications in the parish are considered by Babergh District Council.



Don't forget that if you have any questions or want to find out more we are holding a drop-in event at the Parish Church on Saturday 23 March between 10.00am and 3.00pm.



HOW TO COMMENT

We welcome your comments on the Review, even if you fully support the proposed changes. Demonstrating support will help the Examiner know what the local feelings are. You can comment by either completing the slip below and returning it to Jonathan Ralph, Gable Cottage, The Street, Aldham IP7 6NH or, if you are able, by completing the response online at www.smartsurvey.co.uk/s/Aldham/



You can also respond on a mobile device by scanning this QR Code

Consultation Questions

1. Do you support Revised Policy ALD1 - Spatial Strategy? Yes ☐ No ☐ Unsure ☐

Comments

2. Do you have any comments on the new Chapter 3? Yes ☐ No ☐

Comments

3. Do you have any comments on the new Chapter 5? Yes ☐ No ☐

Comments

Data Protection Notice: All information collected and processed by the Parish Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended). Please note: All comments received will be made publicly available and will be identifiable by name / organisation. All other personal information provided will be protected in accordance with the Data Protection Act 2018.

Name

Address (optional)

EMAIL (optional)

Would you like to be notified when the Parish Council submits the Review to Babergh District Council?
(if yes, please provide either address or email address above) Yes ☐ No ☐

Would you be willing to have your contact details shared with Babergh District Council for the sole purpose of enabling that Council to keep you informed of further consultations on the Review? YES ☐ No ☐

Data will be processed by Babergh District Council in accordance with their information security policies and Privacy Notice (available on their website).

Aldham Neighbourhood Plan Review
Public Consultation
March 2024 Aldham Parish Council

Appendix 2 – Review Consultation Launch Event Display

Aldham

Neighbourhood Plan Review 2024

Thanks for coming to our information event

The exhibition that follows will explain:

- What a neighbourhood plan is
- The history of neighbourhood planning in Aldham
- Why we need to review the Plan we completed in 2020
- What the changes are
- How you can comment on the new Draft Plan
- What will happen after today

What is a Neighbourhood Plan?

It is a relatively new kind of planning document designed to allow local people to play an active part in planning their area.

When complete, the Plan will form part of the statutory development plan for the area, meaning the District Council and Planning Inspectors will have to take note of what it says when considering planning applications.

The Neighbourhood Plan sits alongside national and local planning policies when decisions are made on planning applications



The current Plan

Our Neighbourhood Plan was adopted in January 2020

It contains 7 planning policies that are used by Babergh Council when deciding planning applications

Four years on, there is now a need to update the policy in the Plan 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.



The consequence of the adoption of the Local Plan is that our Neighbourhood Plan policy is now “out of sync” with many other neighbourhood plans across Babergh. As a result, Elmsett 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.

The Review effectively replaces Chapter ‘s 3 (Planning Policy Context) and 5 (Planning Strategy) of the 2020 Plan with new and up-to-date chapters

If approved, it will bring our neighbourhood plan in-line with the newly adopted Local Plan and reduce the pressure for speculative development outside our settlement boundaries.

In a nutshell, we are amending two of the eight chapters of the 2020 Neighbourhood Plan to bring it up-to-date and bring the policy that determines where new development can take place in line with national and district policies.

Elsewhere in the Neighbourhood Plan, reference is made to the 2018 version of the National Planning Policy Framework. The most recent version of this was published in December 2023 and the references will also be updated in the Review.

We are now consulting on the changes for a period of just over 6 weeks.
We need your comments by 13 May 2024.

The Proposed Changes

We've published a leaflet that sets out all the proposed changes.

The leaflet has been distributed to every household in the Parish.

This and the following boards provide a summary of the changes.

Chapter 3 Changes

Chapter 3 of the Neighbourhood Plan is titled **Planning Policy Context**

It provides details of national and local planning policies against which the Neighbourhood Plan has been prepared.

At a national level, the Government's National Planning Policy Framework (NPPF) has been amended a number of times since 2020 and the Neighbourhood Plan Review brings the references to the Framework up-to-date.

Locally, Babergh District Council adopted Part 1 of a new Joint Local Plan for Babergh and Mid Suffolk in November 2023. It means that the references to Local Plan policies in the Neighbourhood Plan are now out of date.

In particular, whereas the previous Local Plan made provision for housing development to take place outside defined Built-Up Area Boundaries *if a local need for it could be demonstrated*, the new Local Plan states:

- The principle of development is established within settlement boundaries [*formerly Built-Up Area Boundaries*] in accordance with the relevant policies of this Plan.
- Outside of the settlement boundaries, development will normally only be permitted where:
 - a) the site is allocated for development, or
 - b) it is in accordance with a made Neighbourhood Plan, or
 - c) it is in accordance with one of the policies of this Plan listed in Table 5; or
 - d) it is in accordance with paragraph 80 of the NPPF (2021).

By way of explanation:

- There are no sites allocated for development in Aldham outside the Settlement Boundary
- The Neighbourhood Plan makes provision for affordable housing on "exception sites" outside the Settlement Boundary, in accordance with national policies.
- Table 5 is reproduced right
- Paragraph 80 (now 84) of the NPPF is reproduced right

Local Plan Table 5

Policies permitting development outside settlement boundaries, subject to the development's accordance with the other relevant policies of the Plan

Local Plan Policy	Provisions
SP04 (1)	development of sites for Gypsies and Travellers and Travelling Showpeople
SP05 (1, 2 and 5)	development on strategic employment sites, at Brantham and along strategic transport corridors
SP07 (1 and 2)	sustainable tourism development where it accords with LP12 (2)
SP08 (1)	development enabling the delivery of key strategic infrastructure projects
LP01 (1)	infill housing development
LP02 (1)	residential annexes
LP03 (1)	residential extensions and conversions
LP04 (1 and 2)	replacement dwellings and conversions
LP05 (1)	rural worker dwellings
LP07 (1 and 2)	community-led housing and rural exception site housing
LP09 (2)	change of use to small scale employment development
LP10 (2)	change from employment use
LP12 (2)	tourism and leisure development
LP13 (1 and 4)	tourist accommodation and removal of holiday occupancy conditions
LP14 (1)	intensive livestock and poultry farming, subject to LP14 (2)
LP19 (3a)	re-use/redevelopment of a heritage asset
LP20 (1)	change of use of land for equestrian purposes or other similar animal based uses
LP21 (1)	change of use of agricultural land to residential garden
LP22 (1)	new agricultural buildings where there is demonstrable evidence to justify the need for them
LP25 (1)	sources, storage and distribution of energy
LP28 (1a)	new accessible local services and community facilities where in accordance with LP28 (1b)
LP31(3)	new health or education facilities

NPPF Paragraph 84

84. Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:
- a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;
 - b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
 - c) the development would re-use redundant or disused buildings and enhance its immediate setting;
 - d) the development would involve the subdivision of an existing residential building; or
 - e) the design is of exceptional quality, in that it:
 - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and
 - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area.

The Proposed Changes

Chapter 5 Changes

Chapter 5 of the Plan sets out a strategy for the location of future development.

The current Plan was written to be in accordance with the Babergh Core Strategy planning document (2014).

The Core Strategy allowed development, including housing, to take place outside of defined “Built-Up Area Boundaries” where a need could be demonstrated.

As illustrated on the previous board, the new Local Plan limits development to take place within “Settlement Boundaries” unless there are specific exceptions.

However, the same Local Plan 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 current Aldham Neighbourhood Plan states 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 (Settlement Boundary).”*

The consequence of the adoption of the Local Plan is that our Neighbourhood Plan policy is now “out of sync” with many other neighbourhood plans across Babergh. As a result, Aldham could come under pressure for further housing development outside the Settlement Boundary if a developer can demonstrate to the District Council that a “local need” exists.

The Neighbourhood Plan Review updates Chapter 5 to bring it in line with the new Joint Local Plan and also includes revising Policy ALD1 to remove the possibility of market housing being proposed outside the Settlement Boundary if a local need can be identified.

The Settlement Boundary is illustrated on the next board

Current Policy

Current Policy ALD1 – Spatial Strategy

The Neighbourhood Plan area will accommodate development commensurate with Aldham's designation in the settlement hierarchy and taking into account the specific characteristics of the plan area including the availability of infrastructure, services and facilities and the local transport network. The focus for new development will be within the defined Built-Up Area Boundary, as defined on the Policies Map.

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

Proposed Policy

New Policy ALD1 – Spatial Strategy

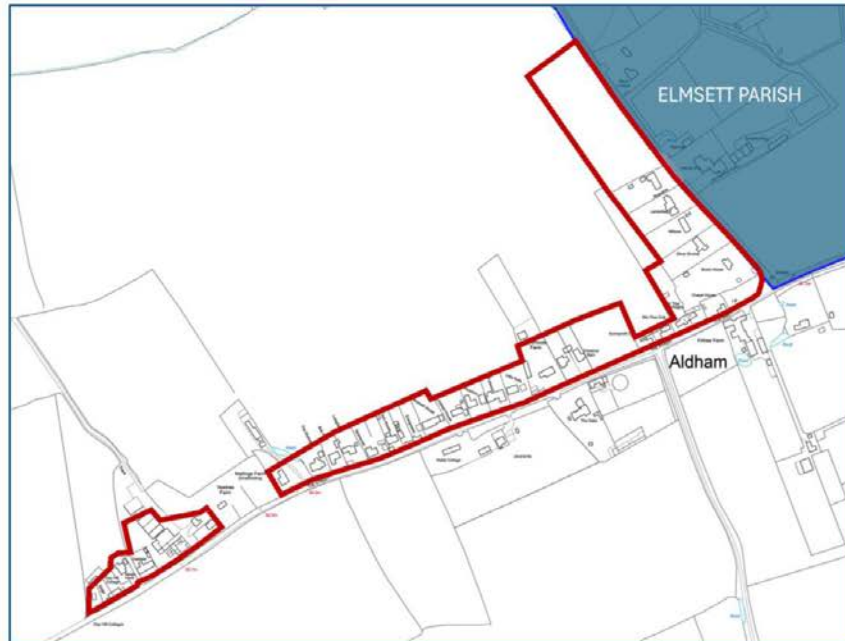
The Neighbourhood Area will accommodate development commensurate with the policies of the adopted Babergh and Mid Suffolk Joint Local Plan - Part 1.

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.

Do you agree with the new Policy ALD1?

Settlement Boundary



What next...

- Once this consultation is complete, the Parish Council will review the comments and submit the Review to Babergh District Council.
- The District Council will then carry out further consultation and submit the Review documents and comments to an Independent Examiner.
- The Examiner will decide whether any changes are required and whether the Review needs to be the subject of a Parish Referendum.
- At this stage the Parish Council feels that a further Referendum will not be necessary.
- When the Review is complete, the new policy will be used when planning applications in the parish are considered by Babergh District Council.



Don't forget that we need your comments by 13 May 2024.
Why not comment online while you're here using the QR Code?



Appendix 3 – Statutory Consultees Notified of Regulation 14 Consultation

MP for South Suffolk

County Cllr to Cosford Electoral Division

County Cllr to Belstead Brook Electoral Division

County Cllr to Hadleigh Electoral Division

Ward Cllr to South East Cosford, Babergh District Council

Ward Cllr to Copdock and Washbrook, Babergh District Council

Ward Cllr to Hadleigh North, Babergh District Council

Ward Cllrs to Hadleigh South, Babergh District Council

Ward Cllr to Balakenham, Mid Suffolk District Council

Ward Cllr to Battisford and Ringshall, Mid Suffolk District Council

Parish Clerk, Flowton Parish Meeting

Parish Clerk, Offton & Willisham Parish Council

Parish Clerk, Somersham Parish Council

Parish Clerk, Chattisham & Hintlesham Parish Council

Parish Clerk, Elmsett Parish Council

Parish Clerk, Whatfield Parish Council

Parish Clerk, Hadleigh Town Council

Corporate Manager - Strategic Planning, Babergh & Mid Suffolk District Councils

SCC Neighbourhood Planning, Suffolk County Council

Land Use Operations, Natural England

Essex, Norfolk & Suffolk Sustainable Places Team, Environment Agency

East of England Office, Historic England

East of England Office, National Trust

Town Planning Team, Network Rail Infrastructure Limited

Highways England

Stakeholders & Networks Officer, Marine Management Organisation

British Telecom

Cornerstone Telecommunications Infrastructure Limited

Vodafone and O2 - EMF Enquiries

Three

EE

Suffolk NHS

National Gas

National Grid

UK Power Networks

Spatial Planning Advisor, Anglian Water

Essex & Suffolk Water

DIO Assistant Safeguarding Manager, Defense Infrastructure Organisation

National Federation of Gypsy Liaison Groups

Norfolk & Suffolk Gypsy Roma & Traveller Service

Diocese of St Edmundsbury & Ipswich

Chief Executive Suffolk Chamber of Commerce

New Anglia LEP

Freeport East

Conservation Officer, RSPB

Senior Planning Manager, Sport England (East)

Suffolk Constabulary
Ecology and Planning Advisor, Suffolk Wildlife Trust
Suffolk Preservation Society
Community Action Suffolk
Dedham Vale Society
National Landscape Essex and Suffolk
Theatres Trust
East Suffolk Internal Drainage Board

Appendix 4 – Statutory Consultee Consultation Notice

ALDHAM (BABERGH) NEIGHBOURHOOD PLAN REVIEW – PRE-SUBMISSION CONSULTATION (REGULATION 14)

Dear Sir / Madam

As part of the requirements of the Localism Act 2011 and Regulation 14 of the Neighbourhood Planning (General) Regulations 2015 (as amended), Aldham Parish Council is undertaking a Pre-Submission Consultation on the Draft Aldham Neighbourhood Plan Focused Review. This is a review of two chapters and one policy of the Neighbourhood Plan which was made by Babergh District Council on 21 January 2020. The District Council has provided your details as a body/individual we are required to consult and your views on the Draft Focused Review would be welcomed.




The full plan and supporting documents can be viewed at <https://aldham.onesuffolk.net/aldham-parish-council/aldham-parish-neighbourhood-plan/> together with information on how to send us your comments. The made Plan can be viewed [here](#)



This Pre-Submission Consultation runs until Monday 13 May 2024



We look forward to receiving your comments. If possible, please submit them online at <https://www.smartsurvey.co.uk/s/Aldham/> or, if that is not possible, please send them in a reply to this email.

Aldham Parish Council

Appendix 5 – Summary of Responses

1. Do you support Revised Policy ALD1 - Spatial Strategy?				
Answer Choices			Response Percent	Response Total
1	Yes		88.89%	16
2	No		0.00%	0
3	Unsure		11.11%	2
			answered	18
			skipped	0

2. Do you have any comments on the new Chapter 3?				
Answer Choices			Response Percent	Response Total
1	Yes		35.29%	6
2	No		64.71%	11
			answered	17
			skipped	1

3. Do you have any comments on the new Chapter 5?				
Answer Choices			Response Percent	Response Total
1	Yes		37.50%	6
2	No		62.50%	10
			answered	16
			skipped	2

Appendix 6 - Comments received to Pre-Submission Consultation, Responses to Comments and Proposed Changes

The tables in this appendix set out the comments that were received during the Pre-Submission Consultation Stage and the responses and changes made to the Plan as a result of the comments.

Name	Organisation	Comment	Parish Council response	Proposed changes
Revised Policy ALD1 - Spatial Strategy				
D Watts		<p>I do agree with the limit on new housing outside of the defined area. My concern is allowing building on the gap between Sunnycroft and Chestnut barn. This area is flooded for most of the year and the flooding has at times included my property (Sunnycroft) where it has spilled over from the field.</p> <p>I am concerned that any developments on the land next to my property would push any flood water over onto my property as it is lower and would have nowhere else to go. I believe this area should not be built on for this reason.</p>	<p>National and local plan policies for the management of surface water flooding would apply to proposals on this site.</p> <p>As above</p>	<p>None</p> <p>None</p>
L Nichols		The team has done a great job pulling this together	Noted	None
J Ralph		Aldham is a small parish in a rural environment. Existing infrastructure (roads, water supplies, etc) is constrained and will not easily cope with significant additional development. It is therefore important that any future development (housing, business, etc) is appropriate to the area. This updated definition of	Noted	None

Name	Organisation	Comment	Parish Council response	Proposed changes
		Settlement (ie development) Boundaries will help to ensure that the parish NP is aligned with the Joint Local Plan in support of these objectives.		
A Laflin		<p>It is noted 'Aldham could come under pressure for further housing development outside the settlement boundary if a developer can demonstrate to the District Council that a 'local need' exists. Local need is well defined, and it is unlikely that a developer could make this up. Local need includes social provision for families in the village. Whilst cutting off a perceived route for developers, this also cuts off a legitimate route to cater for real local needs. How will the needs of locals be met with this change made ?</p> <p>How can this review of the neighbourhood plan be aligned to the new local plan, when part of that plan has yet to be published ? How can the red line settlement boundary be defined if site allocations are ongoing as part of the second phase of the local plan?</p>	<p>Should local need be demonstrated, national and Local Plan policies allow small affordable housing schemes to be built outside but well related to the Settlement Boundary for occupation by those with a local need that cannot afford market housing.</p> <p>The Settlement Boundary was defined in the 2020 Plan. The Joint Local Plan Part 2 has been abandoned since the consultation was carried out and a new joint Local Plan is to be prepared.</p>	<p>None</p> <p>None</p> <p>None</p>

Name	Organisation	Comment	Parish Council response	Proposed changes
		<p>Revised policy ALD1, refers to 'infrastructure capacity, and heritage, and landscape designations'. Surely this should actually read 'infrastructure capacity, or heritage, or landscape designations'.</p> <p>There is a plan included in the document which is labelled 'settlement boundaries as defined in the 2020 Plan. It is unclear whether the red line boundary will remain as the 2020 plan, or be changed.</p> <p>What are the criteria for determining whether a referendum is required, and who decides?</p> <p>Could you please confirm the timescales for the various stages of the consultation, and reviews.</p>	<p>All three matters need to be taken into account not just one matter, which would apply if "and" were replaced by "or".</p> <p>The consultation did not propose to change the 2020 Plan Settlement Boundary.</p> <p>The Neighbourhood Plan Examiner decides based on whether they determine that it includes modifications so significant or substantial as to change the nature of the made Plan.</p> <p>The Review will be submitted to the District Council,</p>	<p>None</p> <p>None</p> <p>None</p>

Name	Organisation	Comment	Parish Council response	Proposed changes
		Who is the independent examiner ?	who will carry out a further consultation before the Review is examined. It would typically take around 5-6 months from submission of the Plan to adoption.	None
		Given that the majority of the wording in the new Neighbourhood Plan simply refers to the local policies and NPPF, and the red line settlement boundary would be included within the local plan, what is the value of maintaining a separate neighbourhood plan ?	<p>The Examiner is typically a chartered town planner with experience of assessing neighbourhood plans and is independent of the Parish and District Council.</p> <p>The Neighbourhood Plan provides up-to-date and locally specific planning policies that are not included in the Local Plan. Given that the new Local Plan will not be</p>	None

Name	Organisation	Comment	Parish Council response	Proposed changes
			adopted until 2029, it ensures that there is not a policy vacuum of matters that are specific to Aldham.	
P Boswell	Patrick Allen Architects.	We support The focus for new development to be within the defined settlement boundaries, as shown on the Policies Map, where the principle of development is accepted.	Noted	None
C Squire		Implication that physical status of Aldham - access, transport and facilities - are all of major influence on ability to accommodate development of any kind.	Noted	None
Dr & Mrs K Irwin		The area marked between Sunnycroft and Chestnut Barn floods and is frequently a large pond. It may well flood Sunnycroft so I don't believe any building should take place.	The site is already allocated in the 2020 Neighbourhood Plan that was approved at Parish Referendum at the time. National and local plan policies for the management of surface water flooding would apply to proposals on this site.	None
Mr & Mrs J Bray		Fully support - excellently put together	Noted	None

Name	Organisation	Comment	Parish Council response	Proposed changes
	Suffolk CC	We note the changes proposed to Policy ALD1 Spatial Strategy.	Noted	None
Chapter 3 Comments				
L Nichols		I'm happy with the amendments	Noted	None
J Ralph		See above - future development should be aligned with the Joint Local Plan and must support sustainable (ie not excessive) growth.	Noted	None
A Laflin		<p>It is noted 'Aldham could come under pressure for further housing development outside the settlement boundary if a developer can demonstrate to the District Council that a 'local need' exists. Local need is well defined, and it is unlikely that a developer could make this up. Local need includes social provision for families in the village. Whilst cutting off a perceived route for developers, this also cuts off a legitimate route to cater for real local needs. How will the needs of locals be met with this change made ?</p> <p>How can this review of the neighbourhood plan be aligned to the new local plan, when part of that plan has yet to be published ? How can the red line settlement boundary be defined if site allocations are ongoing as part of the second phase of the local</p>	<p>Should local need be demonstrated, national and Local Plan policies allow small affordable housing schemes to be built outside but well related to the Settlement Boundary for occupation by those with a local need that cannot afford market housing.</p> <p>The Settlement Boundary was defined in the 2020 Plan. The Joint Local Plan Part 2 has been</p>	<p>None</p> <p>None</p>

Name	Organisation	Comment	Parish Council response	Proposed changes
		plan?	abandoned since the consultation was carried out and a new joint Local Plan is to be prepared.	None
		Revised policy ALD1, refers to 'infrastructure capacity, and heritage, and landscape designations'. Surely this should actually read 'infrastructure capacity, or heritage, or landscape designations'.	All three matters need to be taken into account not just one matter, which would apply if "and" were replaced by "or".	None
		There is a plan included in the document which is labelled 'settlement boundaries as defined in the 2020 Plan. It is unclear whether the red line boundary will remain as the 2020 plan, or be changed.	The consultation did not propose to change the 2020 Plan Settlement Boundary.	None
		What are the criteria for determining whether a referendum is required, and who decides ?	The Neighbourhood Plan Examiner decides based on whether they determine that it includes modifications so significant or substantial as to	None

Name	Organisation	Comment	Parish Council response	Proposed changes
		<p>Could you please confirm the timescales for the various stages of the consultation, and reviews.</p> <p>Who is the independent examiner?</p> <p>Given that the majority of the wording in the new Neighbourhood Plan simply refers to the local policies and NPPF, and the red line settlement boundary would be included within the local plan, what is the value of maintaining a separate neighbourhood plan ?</p>	<p>change the nature of the made Plan.</p> <p>The Review will be submitted to the District Council, who will carry out a further consultation before the Review is examined. It would typically take around 5-6 months from submission of the Plan to adoption.</p> <p>The Examiner is typically a chartered town planner with experience of assessing neighbourhood plans and is independent of the Parish and District Council.</p> <p>The Neighbourhood Plan provides up-to-date and locally</p>	<p>None</p> <p>None</p>

Name	Organisation	Comment	Parish Council response	Proposed changes
			specific planning policies that are not included in the Local Plan. Given that the new Local Plan will not be adopted until 2029, it ensures that there is not a policy vacuum of matters that are specific to Aldham.	
C Squire		I believe we stated the case for NO more development when application for planning permission on the south side of The Street was considered. If anything, now more important if climate change is producing more water!	Noted	None
Dr & Mrs K Irwin		See above	Noted	None
Mr & Mrs J Bray		Still cannot really understand how the "hinterland" designation can be altered to "hamlet" when there has been no significant changes to our village from 2017. An additional 13 dwellings must be treated as an absolute maximum number.	Noted	None
	Suffolk CC	We note the changes proposed to Chapter 3, and welcome the reference to the Suffolk Minerals and Waste Local Plan 2020 in paragraph 3.6.	Noted	None

Name	Organisation	Comment	Parish Council response	Proposed changes
	Babergh District Council	<p>At this stage we have no specific comments to make on these but, for context, you might want to consider the following:</p> <p>amending the first sentence of paragraph 3.1 to read: 'This Neighbourhood Plan has been updated in part to have regard to the content of the latest National Planning Policy Framework (NPPF) and the relevant Local Plan documents that now cover the parish.'</p> <p>amending the first sentence of paragraph 3.4 to read: '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.'</p>	<p>Noted</p> <p>Section 3 will be amended to reflect the situation at the time the Plan Review is submitted.</p> <p>As above</p>	<p>None</p> <p>Amend Section 3 to reflect most recent published NPPF</p> <p>As above</p>
Chapter 5 Comments				
L Nichols		I'm happy with the amendments	Noted	None
A Laflin		It is noted 'Aldham could come under pressure for further housing development outside the settlement boundary if a developer can demonstrate to the District Council that a 'local need' exists. Local need is well defined, and it is unlikely that a developer could make this up. Local need includes social provision for families in the village. Whilst cutting off	Should local need be demonstrated, national and Local Plan policies allow small affordable housing schemes to be built outside	

Name	Organisation	Comment	Parish Council response	Proposed changes
		<p>a perceived route for developers, this also cuts off a legitimate route to cater for real local needs. How will the needs of locals be met with this change made ?</p> <p>How can this review of the neighbourhood plan be aligned to the new local plan, when part of that plan has yet to be published ? How can the red line settlement boundary be defined if site allocations are ongoing as part of the second phase of the local plan?</p> <p>Revised policy ALD1, refers to 'infrastructure capacity, and heritage, and landscape designations'. Surely this should actually read 'infrastructure capacity, or heritage, or landscape designations'.</p> <p>There is a plan included in the document which is labelled 'settlement boundaries as defined in the 2020 Plan. It is unclear whether the red line</p>	<p>but well related to the Settlement Boundary for occupation by those with a local need that cannot afford market housing.</p> <p>The Settlement Boundary was defined in the 2020 Plan. The Joint Local Plan Part 2 has been abandoned since the consultation was carried out and a new joint Local Plan is to be prepared.</p> <p>All three matters need to be taken into account not just one matter, which would apply if "and" were replaced by "or".</p> <p>The consultation did not propose to</p>	

Name	Organisation	Comment	Parish Council response	Proposed changes
		<p>boundary will remain as the 2020 plan, or be changed.</p> <p>What are the criteria for determining whether a referendum is required, and who decides ?</p> <p>Could you please confirm the timescales for the various stages of the consultation, and reviews.</p> <p>Who is the independent examiner ?</p>	<p>change the 2020 Plan Settlement Boundary.</p> <p>The Neighbourhood Plan Examiner decides based on whether they determine that it includes modifications so significant or substantial as to change the nature of the made Plan.</p> <p>The Review will be submitted to the District Council, who will carry out a further consultation before the Review is examined. It would typically take around 5-6 months from submission of the Plan to adoption.</p> <p>The Examiner is typically a</p>	

Name	Organisation	Comment	Parish Council response	Proposed changes
		Given that the majority of the wording in the new Neighbourhood Plan simply refers to the local policies and NPPF, and the red line settlement boundary would be included within the local plan, what is the value of maintaining a separate neighbourhood plan ?	<p>chartered town planner with experience of assessing neighbourhood plans and is independent of the Parish and District Council.</p> <p>The Neighbourhood Plan provides up-to-date and locally specific planning policies that are not included in the Local Plan. Given that the new Local Plan will not be adopted until 2029, it ensures that there is not a policy vacuum of matters that are specific to Aldham.</p>	
P Boswell	Patrick Allen Architects.	We note that the NHP includes the site for the 7 bungalows along Hadleigh Rd within the settlement boundary for which there is a presumption to support the development. We confirm on behalf of	Noted	None

Name	Organisation	Comment	Parish Council response	Proposed changes
		our client that the site is an active application and should be deliverable as per the original NHP.		
C Squire		I feel that Chapter 5 covers most of the doubts!	Noted	None
Dr & Mrs K Irwin		See above	Noted	None
Mr & Mrs J Bray		Fully support. Thank you Parish Council for your outstanding work producing this document.	Noted	None
	Suffolk CC	We note the changes proposed to Chapter 5.	Noted	None
	Babergh DC	<p>Nb: While the proposed text suggests that throughout the remainder of the NP you refer to our Joint Local Plan as 'JLP1', this is not the case as proposed new paragraphs 5.3 and 5.4 both refer to 'Part 1 of the Joint Local Plan, and paragraph 5.6 refers to the 'Joint Local Plan - Part 1.'</p> <ul style="list-style-type: none"> with the above note also in mind, amend the first sentence of paragraph 5.1 to read: <i>'The planning policy framework for the Parish is now established in the adopted Joint Local Plan Part 1 and the 2020 "made" Aldham Neighbourhood Plan. The latter defines ... [etc.]'</i> <p>We also note that the Parish Council (the Qualifying Body) have issued a Regulation 14 Modification Proposal Statement in which they set out that they: ...</p>	<p>The amendments will be made to ensure consistency.</p> <p>Paragraph 5.1 will be amended to reflect the situation at the time the Plan Review is submitted.</p> <p>Noted</p>	<p>Amend and update chapter 5 as suggested</p> <p>As above</p>

Name	Organisation	Comment	Parish Council response	Proposed changes
		<p><i>"consider that the nature of the modifications to be not so significant or substantial as to change the nature of the made Plan"</i> and that their Review Plan <i>"would require examination but, subject to the decision of the independent examiner, would not require a referendum"</i>. At this stage, the District Council is minded to agree with this assessment but will issue our own statement on this matter at the appropriate time.</p> <p>Aside from the specific changes proposed through this focused consultation exercise, there is at least one unforeseen consequence that will need to be addressed before the Review Plan can be submitted and there are also other opportunities to make non-material amendments to the final Review Plan that would, in our opinion, help bring the whole plan up to date.</p>	<p>The Plan paragraphs will be reviewed and updated to reflect the current situation at the time of submitting the Plan to the District Council</p>	As above
General Comments				
	Historic England	<p>Thank you for inviting Historic England to comment upon the ongoing Pre-Submission Consultation on the Draft Aldham Neighbourhood Plan Focused Review.</p> <p>We have reviewed the information supplied and note the proposed changes which updates the adopted Plan to bring it in-line with the newly adopted Local Plan and revised NPPF (2023). We do</p>	<p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p>

Name	Organisation	Comment	Parish Council response	Proposed changes
		not wish to make any additional comments at this stage.		
	Water Management Alliance	<p>Thank you for consulting us on the Aldham (Babergh) Neighbourhood Plan.</p> <p>The parish of Aldham lies partially within the catchment area of East Suffolk Water Management Board. I note from the plans that there are currently no developments proposed within the catchment area of ESWMB, therefore the Board does not currently have any comments to make.</p> <p>However, please be aware that if any major developments (>1ha or 10+ dwellings) are proposed at any time within the catchment area of ESWMB, then the Board will need to be consulted.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p>
	Suffolk and Essex National Landscape Team	<p>Thank you for consulting the National Landscape team (formerly AONB) on the Aldham Neighbourhood Plan Review.</p> <p>As Aldham lies outside the Dedham Vale National Landscape boundary therefore our working area of interest, the National Landscape team will not be submitting any comments on the emerging document.</p> <p>We wish you well preparing the new document.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p>

Name	Organisation	Comment	Parish Council response	Proposed changes
	Anglian Water	<p>Thank you for consulting Anglian Water on the focused review being carried out on the Aldham Neighbourhood Plan.</p> <p>I am writing to confirm that we have no comments to make to the proposed changes.</p>	<p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p>
	Dedham Vale Society	<p>Thank you for your email. As your village is outside the Dedham Vale National Landscape (was AONB), we are not a mandatory consultee. However, we agree that your proposed changes are appropriate in the context of a rural village.</p>	Noted	None
	Natural England	<p>Thank you for your consultation on the above dated 19 March 2024.</p> <p>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.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>

Name	Organisation	Comment	Parish Council response	Proposed changes
		<p>However, we refer you to the attached annex [available from the Parish Clerk on request] which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.</p> <p>Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .</p> <p>Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.</p> <p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>

Name	Organisation	Comment	Parish Council response	Proposed changes
		<p>receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.</p> <p>Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.</p>	Noted	None
	National Highways	<p>Thank you for your correspondence, dated on 19 March 2023, notifying National Highways of the consultation under Regulation 14.</p> <p>National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding the Aldham Neighbourhood Plan we have responsibility for the trunk road A12.</p> <p>The amendment proposes to modify the existing made plan to amend the Policy ALD 1 – Spatial Strategy to bring it into line with recently adopted Babergh and Mid Suffolk Joint Local Plan Part 1, would not have any predicted adverse impact on the Strategic Road Network (SRN).</p> <p>We do not have any more comment of this.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>

Name	Organisation	Comment	Parish Council response	Proposed changes
	Environment Agency	Thank you for consulting us on the pre-submission plan for the Aldham Neighbourhood Plan.	Noted	None
		For the purposes of neighbourhood planning, we have assessed those authorities who have "up to date" local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.	Noted	None
		A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan.	Noted	None
		Environmental Constraints	Noted	None

Name	Organisation	Comment	Parish Council response	Proposed changes
		<p>We have identified that the Neighbourhood Plan Area will be affected by the following environmental constraints:</p> <p>Flood Risk</p> <p>Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within the neighbourhood plan area. There is a small flood zone to the west of Red Hill Road.</p> <p>On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. Nevertheless, we recommend the inclusion of relevant policies to cover the management of flood risk. Allocation of any sites and any windfall development delivered through the Plan period should follow the sequential approach. National Planning Policy Framework (NPPF) paragraph 167 sets this out.</p> <p>Water Resources</p> <p>Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available</p>	<p>Noted</p> <p>Noted. Flood risk policies are already in the up-to-date Local Plan.</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p>

Name	Organisation	Comment	Parish Council response	Proposed changes
		<p>water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.</p>	<p>This matter is addressed in the Local Plan.</p>	<p>None</p>
		<p>New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</p>	<p>Noted</p>	<p>None</p>
		<p>Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water</p>	<p>Noted</p>	<p>None</p>

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		<p>Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk).</p> <p>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 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.</p> <p>Informatives We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on</p>	<p>Noted. This is not appropriate for the focused review.</p> <p>Noted</p>	<p>None</p> <p>None</p>

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	Babergh District Council	<p>This response is made for and on behalf of Robert Hobbs (Corporate Manager for Strategic Planning at Babergh & Mid Suffolk District Councils).</p> <p>Thank you for consulting us on the proposed changes to Chapter 3 (Planning Policy Context), Chapter 5 (Planning Strategy), and to Policy ALD1 (Spatial Strategy) within the adopted Aldham Neighbourhood Plan. At this stage we have no specific comments to make on these but, for context, you might want to consider the following [listed under appropriate sections above or as follows]: <i>Specific comments from SCC are inserted above</i></p> <p>Aside from the specific changes proposed through this focused consultation exercise, there is at least one unforeseen consequence that will need to be addressed before the Review Plan can be submitted and there are also other opportunities to make non-material amendments to the final Review Plan that would, in our opinion, help bring the whole plan up to date.</p> <p>NPPF paragraph numbers - While replacement Chapter 3 explains that a new NPPF was published in December 2023, the NPPF paragraph numbers referred to throughout the rest of the plan all still link back to the July 2018 NPPF. For anyone reading this Aldham NP for the first time, this will lead to confusion or misunderstanding. See for example Policy ALD2(iii) and para 6.9 where what was NPPF</p>	<p>Noted</p> <p>Noted</p> <p>Noted. Non-material amendments will be made to the Plan as suggested.</p> <p>The Plan will be updated to refer to the latest NPPF (December 2024).</p>	<p>None</p> <p>None</p> <p>Other content in the Plan will be updated without changing the thrust of the Plan</p> <p>The Plan will be updated to refer to the December 2024 NPPF</p>

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		<p>para 79 (2018) is now NPPF para 84 (2023). Similarly, para 6.19 refers to NPPF para 77 (now 82), and para 7.1 refers to NPPF para 99 (now 105). Finally, ALD5 and the glossary definition for Rural Exception Sites both refer to NPPF para 71. The nearest equivalent to this is now NPPF para 73, and the concept of 'entry-level homes' is no longer relevant.</p> <p>The Parish Council should take a sensible / practical course of action to address the above.</p> <p>Chapter 1 / para 1.11 - Consider amending this to paragraph to explain that, following the successful referendum, the Aldham NP was adopted by Babergh District Council in January 2020 and including a short new paragraph to outline which parts of the plan have been updated through this review.</p> <p>Chapter 6 – some paragraphs could also benefit from contextual updates, for example, para 6.2 could explain that ... <i>'the housing figures ... were those set out in the 2014 Babergh Core Strategy. The Joint Local Plan was at an early stage ... the numbers identified for Aldham ... could not be relied upon'</i></p> <p>We trust that our comments are helpful. Please do not hesitate to contact us if a follow up conversation would be beneficial.</p>	<p>Paragraph 1.11 will be amended as part of the non-material update to the Plan.</p> <p>Paragraphs will be amended as appropriate as part of the non-material update to the Plan.</p> <p>Noted</p>	<p>Amend paragraph 1.11 as suggested</p> <p>Amend chapter 6 as suggested</p> <p>None</p>