

Mid Suffolk District Council



Elmswell N'hood Plan 2022 - 2037

Reg 16 Submission consultation responses

In late January 2023, Elmswell Parish Council (the 'qualifying body') submitted their Neighbourhood Development Plan to Mid Suffolk District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Monday 6 March until Wednesday 26 April 2023.

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

The representation from Historic England did not arrive until late on the 28 April. It has been recorded as late representation.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Natural England
(3)	National Highways
(4)	Anglian Water
(5)	James Bailey Planning obo Taylor Wimpey
(6)	Pegasus Planning obo Endurance Estates Strategic Land Ltd
(7)	ElmsWild
(8)	Resident - Harvey
(9)	Resident - Mogridge
(10)	Resident - Rogers
(11)	Resident - Spencer
(12)	Mr Livall
(13)	Late representation: Historic England

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(1) SUFFOLK COUNTY COUNCIL



Date: 26 April 2023
Enquiries to: Georgia Teague
Tel: [REDACTED]
Email: georgia.teague@suffolk.gov.uk
neighbourhoodplanning@suffolk.gov.uk

Babergh and Mid Suffolk District Council
Endeavour House,
8 Russell Road,
Ipswich
IP1 2BX

Dear Caileigh Gorzelak,

Submission Consultation version of the Elmswell Neighbourhood Plan

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

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

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

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

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

Meeting the needs of an ageing population

As part of the pre-submission consultation, SCC raised the concerns for meeting the needs of an ageing population.

SCC suggested that the plan could also include the desire for smaller homes that are adaptable and accessible, which meets the requirements for both older residents as well as younger people and families. Building homes that are accessible and adaptable means that these homes can be changed with the needs of their occupants, for example, if their mobility worsens with age, as these homes are built to a standard that can meet the needs of a lifetime. While it is understandable that each housing type may not be suitably accommodated on every site, efforts should be made, where possible, to ensure that each site contains a mixture of housing types. This can help prevent segregation by age group and possible resulting isolation.

Whilst SCC acknowledges that the Ministerial Statement 2015 states that neighbourhood plans should not set additional technical standards; SCC is not proposing that the plan should impose a requirement for M4(2). SCC recommended that the plan set out a positive position towards proposals which contain homes built to those standards. This will help the plan meet the needs of a wider range of groups including older and vulnerable people, reflecting paragraph 61 of the NPPF 2021.

Following guidance from footnote 46 in the NPPF 2021, which indicates that “Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.”

The neighbourhood plan does not provide any demographic information for older residents. The Suffolk Observatory states 22.6% of the residents are aged 65 or older in Elmswell. We suggest that Policy ELM1 refers to an ageing population with provisions to meet the needs of this group with adaptable homes and specialist accommodation.

Therefore, in order to meet the needs of an ageing population, the plan should state the support for homes that are adaptable and accessible (i.e., built to M4(2) standards). To help the plan meet Basic Condition a) and accord with paragraph 61 and footnote 46 of the NPPF 2021, the following wording is recommended for Policy ELM1 Planning Strategy:

"Support will be given for homes that are adaptable (meaning built to optional M4(2) standards), in order to meet the needs of the ageing population, without excluding the needs of the younger people and families."

Public Rights of Way

There is currently no specific mention that the Plan Area includes a significant public rights of way (PROW) network. The NPPF 2021 states in paragraph 100 that planning policies and decisions should protect and enhance PROW and access, including taking opportunities to provide better facilities for users, for example by adding links to existing PROW networks.

We would like to see specific mention of the local PROW network, its importance, and how it enables effective links with neighbouring parishes and beyond. This would ideally be included as an individual policy, with a corresponding map showing the PROW in the vicinity.

The definitive map for Elmswell can be found at <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/Elmswell.pdf>.

A neighbourhood plan is an opportune time to protect and, where possible, seek enhancement of the rights of way in the village. This would help to achieve sustainable development, through encouraging travel via non-vehicular modes of transport, thereby helping to reduce traffic congestion, air pollution, and climate change.

The Neighbourhood Plan should recognise that some rights of way provide routes for commuting, provide access to services and facilities, provide leisure routes, and also improve access for people with mobility issues. They also encourage people to be fit and healthy by providing convenient, free and low-cost, and attractive opportunities for being active.

We would also like to see a commitment along the lines that development which would adversely affect the character or result in the loss of existing or proposed PROW will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use. This will apply to PROW for pedestrian, cyclist, or horse rider use. Improvements and additions to such PROW shall be delivered as an integral part of new development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites as appropriate.

The following wording is suggested to be included in a new policy regarding PROW and sustainable travel:

“Development which would adversely affect the character or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use”

Settlement Boundary

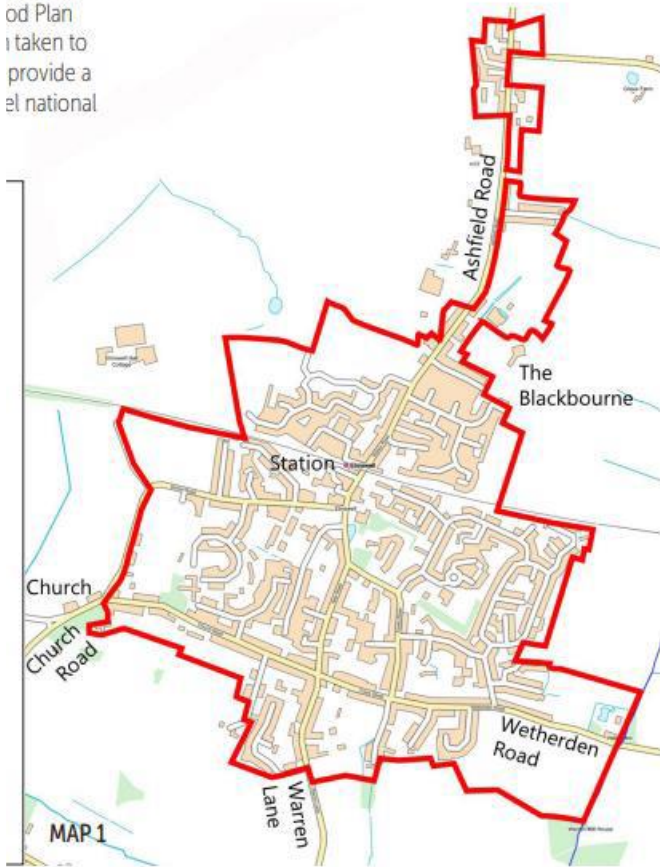
There are variations between the settlement boundary displayed on Map 2 and on the Inset Policies Maps. The settlement boundary is indicated on the Key on the overall Policies Map, but does not appear on the map itself. It is recommended that the settlement boundary is displayed on the overall Policies Map on page 13, as it is on the inset maps.

We note paragraph 3.2, stating that the most current settlement boundary is from the 1998 Mid Suffolk Local Plan, until the Emerging Joint Local Plan makes any further progress.

It is recommended that the neighbourhood plan should also include a map displaying the new settlement boundary, as displayed from Map 1 from the “Summary Leaflet”, as found on the parish council’s consultation page (screenshot below). This map should be labelled as “*Map 3 Neighbourhood Plan Settlement Boundary*”. By only having a map displaying the old settlement boundary in the plan, this could lead to ambiguity over where the new settlement boundary lines are.

This amendment should be made to accord with paragraph 16, part d, of the NPPF 2021, which states: “plans should ... contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”.

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

Yours sincerely,

Georgia Teague
Planning Officer
Growth, Highways, and Infrastructure

(2) NATURAL ENGLAND

Date: 04 April 2023
Our ref: 424474



Babergh District Council & Mid Suffolk District Council
communityplanning@baberghmidsuffolk.gov.uk

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
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CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

The Elmswell Neighbourhood Plan 2022-2037 Regulation 16 Consultation

Thank you for your consultation on the above dated 03 March 2023

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

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

Natural England does not have any specific comments on this draft neighbourhood plan.

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

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

Yours faithfully

Dominic Rogers
Consultations Team

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

Natural environment information sources

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

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

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

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

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

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

Natural environment issues to consider

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

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

¹ <http://magic.defra.gov.uk/>

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

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

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

⁵ <http://magic.defra.gov.uk/>

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

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

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

Landscape

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

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

Wildlife habitats

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

Priority and protected species

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

Best and Most Versatile Agricultural Land

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

Improving your natural environment

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

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

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

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

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

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

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

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

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

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

(3) NATIONAL HIGHWAYS



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

Email:
communityplanning@baberghmidsuffolk.gov.uk

Mark Norman
Spatial Planner Manager
Operations (East)
National Highways
Woodlands
Manton Lane
Bedford MK41 7LW

25 April 2023

National highways ref NH/23/00136

Dear Sir/Madam,

Consultation on the Elmswell Neighbourhood Development Plan (NDP) – Regulation 16 Submission Consultation

National Highways (NH) welcomes the opportunity to comment on the Regulation 16 submission draft consultation of the Elmswell NDP which covers the plan period from 2022 to 2037.

NH has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In relation to the Elmswell NDP, our principal interest is in safeguarding the operation of the SRN in the vicinity of the parish. Elmswell Parish is bounded to the south by the A14 and to the west by the A1088, with Woolpit Interchange located within the parish boundary. The A14 forms part of the NH SRN network whilst the A1088 is managed by the Local Highway Authority (LHA). Elmswell is placed strategically between Stowmarket to the east (circa. 8km) and Bury St Edmunds in the west (circa. 12km), with the A14 providing direct link via Woolpit Interchange to the south of Elmswell.

We understand that the NDP is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the NDP for Elmswell is required to be in conformity with the Submission Draft Babergh and Mid Suffolk Joint Local Plan, the Town & Country Planning Act 1990, the Planning & Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Development Planning Regulations 2012.

We understand the Joint Local Plan has previously identified Elmswell as a Core Village, with the parish making a contribution towards meeting the wider needs of the future growth within Mid Suffolk, providing 834 additional homes within the parish between 2018 and 2037, of which 480 had planning permission as of April 2018. However, it is noted the Examination found that the policies of the Local Plan related to scale, distribution and housing allocation and settlement boundaries to be unsatisfactory and have been withdrawn from the Examination process in order to be reassessed and brought forward as Part B of the Plan in the future. Nevertheless, it is our understanding that the NDP has still been prepared to have regard to what is expected to be in Part A of the Plan. NH would expect to be consulted as and when these allocations for the parish and planning applications come forward in the usual way to confirm each application, these will be assessed based on standard procedure in relation to their expected distribution and impact on the SRN (in relation to the A14).

Having reviewed the draft submission version of the NDP we note there to be no significant land allocations for development which could have an impact on the local SRN network, it is expected NH would be consulted if/ when these do come forward. NH believes that the scale of growth proposed within the NDP remains low and any potential impacts will be assessed accordingly.

NH therefore consider the limited level of growth proposed across the Elmswell NDP area, will not have a significant impact on the operation of the SRN.

We have no further comments to provide and trust the above is useful in the progression of the Elmswell NDP.

Yours sincerely,



Mark Norman
Spatial Planner Manager
Operations (East)
Email: mark.norman@nationalhighways.co.uk

(4) ANGLIAN WATER

E fm: Tessa Saunders | Spatial Planning Advisor
Rec'd: 26 April 2023
Subject: RE: Consultation on R16 Elmswell N'hood Plan (Mid Suffolk DC)

Dear Community Planning Team,

Thank you for inviting comments on the Elmswell Neighbourhood Plan. Anglian Water is the statutory water and sewerage undertaker for the neighbourhood plan area. Given the specific policy areas identified within the Elmswell Neighbourhood Plan, we have limited comments, and only have the following observation in relation to Policy ELM 3.

We note that Policy ELM 3 identifies Local Green Spaces within Elmswell, however, there is no specific policy test in relation to development or land use proposals. Whilst the supporting text identifies that development is restricted to that which has to be demonstrated as being essential for the site, in line with the Green Belt policies defined by the NPPF, this should be reiterated in the policy to provide certainty regarding how any proposals for development will be considered - e.g. "Development in the Local Green Spaces will be consistent with national policy for Green Belts".

We welcome the reference in paragraph 3.10 that the operational requirements of infrastructure providers are not affected by this designation. We do have network assets that intersect with some of the identified Local Green Spaces and recognise that the designation does not prevent any operational development that may be needed to manage, maintain or repair our assets.

Kind regards,

Tessa Saunders MRTPI | Spatial Planning Advisor



Tessa Saunders MRTPI
Spatial Planning Advisor

Mobile: 07816 202878

Web: www.anglianwater.co.uk

Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon,
Cambridgeshire, PE29 6XU



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(5) JAMES BAILEY PLG obo TAYLOR WIMPEY UK LTD



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W: jamesbaileyplanning.com

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Date: 21st April 2023

Our Ref: 20.040

'Elmswell NP Consultation'
c/o Spatial Planning Policy Team
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Sent via Email: communityplanning@baberghmidsuffolk.gov.uk

Dear Sir or Madam,

Draft Elmswell Neighbourhood Plan Consultation (Regulation 16) - Supporting Letter

This submission has been prepared by James Bailey Planning Ltd. on behalf of our clients Taylor Wimpey UK Ltd., who are the landowners for the site off St. Edmunds Drive / Station Road, Elmswell. (See Appendix One for Site Location Plan).

Accordingly, we would request that the following documents be considered as part of our submission to this consultation period for Regulation 16:

- This Covering Letter;
- Site Location Plan (Appendix One);
- Site Constraints and Opportunities Plan (Appendix Two); and
- Comments Form x3.

ELM 1 – Planning Strategy

Last year, we submitted a response on behalf of our clients to the pre-submission consultation stage. Overall, the Neighbourhood Plan was seen as having a positive approach to ensure the key intentions of the Plan were achieved, whilst also promoting sustainable development.

The approach that is continuing to be taken by the Elmswell Neighbourhood Plan is consistent with the National Planning Policy Framework (NPPF) in so far that it does not restrict development in being only inside the settlement boundary.

Although Taylor Wimpey's site off St. Edmunds Drive / Station Road is no longer included in the Neighbourhood Plan, it remains: available; achievable; and deliverable. It may fit in well with ELM1 in the future, if there is a requirement for additional housing within the village or district at some point.

Policy ELM 2 – Protection of Important Views

Taylor Wimpey reaffirms their views in the statements made in June 2022 regarding the wording of Policy ELM 2. The progression of the Neighbourhood Plan is supported, as is securing important views. However, any views must be properly and fully justified, and explained to the reader.

It remains the view of JBPL that the current wording of the Policy ELM 2 is open to interpretation and does not provide the reader with clear and defined guidance. Importantly, the Policies Map does not specify key features and characteristics within each identified view, that the Neighbourhood Plan has identified for protection. It is therefore questioned whether the evidence that is currently relied upon to support the Neighbourhood Plan actually meets the basic conditions tests, by contributing to sustainable development. There is neither sufficient nor proportionate information presented to guide development towards sustainable solutions, that would assist a decision taker on either what would or would not be acceptable at this location, or what would be needed to avoid a detrimental visual impact on the 'important view' as per the policy wording.

Taylor Wimpey therefore requests further consideration is given to the Appraisal of Important Views (January 2023) document that 'supports' Policy ELM 2. For example, View 4 specifically identifies existing industrial development that has already diminished this view. Similarly, View 6 includes a vista of overhead lines and transformer, a new housing development that is under five years old and post-war housing development that fronts the main road. We would therefore question what important features requires protection within these views?

In line with the NPPF Paragraph 16, Plans should be prepared with the objectives of contributing to sustainable development, as well as serving a clear purpose. Therefore, if any of the specifically identified views, notably 4 and 6, cannot be justified in terms of a reason or feature for protection, then they should be removed from the Policies Map to ensure that the Neighbourhood Plan is sound and consistent with the NPPF.

ELM 3 – Local Green Spaces

The approach being taken by the Neighbourhood Plan in Policy ELM 3 is supported.

The Neighbourhood Plan has identified several Local Green Spaces across the village. These Green Spaces enhance the character of the village and offers the community a place for social gatherings and/or recreational activities. It can be seen from the Opportunities & Constraints Plan for Taylor Wimpey's site off St. Edmunds Drive / Station Road (see

Appendix Two), that several green spaces have already potentially been identified. Notably, there is large area of public open space envisaged towards the western boundary of the site.

The public open space to the west of the site serves numerous functions, including becoming a home to new: hedgerow and tree planting; wildflower meadow; attenuation features; and the Local Equipped Area of Play (LEAP). This green space would provide the local community with additional public open space, which will be a significant aspect of the new development. As such, there may be an opportunity for the Elmswell Neighbourhood Plan to identify the open space on the land off St. Edmunds Drive / Station Road as a new 'Local Green Space' on the Policies Map.

If the land off St. Edmunds Drive / Station Road were to come forward for development in the future, then Taylor Wimpey would be willing to offer the western boundary of the site as a new Local Green Space under Policy ELM3

CONCLUSION

In summary, the approach taken by the Neighbourhood Plan is consistent with the NPPF for Policy ELM1. Taylor Wimpey also supports the approach of the Neighbourhood Plan to secure important views in ELM 2, however further justification and details on what is being protected needs to be specified. Taylor Wimpey would like to offer the green space on the western boundary of their site to be considered as a new 'Local Green Space' in Policy ELM 3 as part of any future development on the site.

We hope the information submitted is all in order, and we look forward to receiving safe receipt, of the submission. Please do let us know if you should require anything further.

In the meantime, we look forward to continuing to collaborate with the local community towards the next stage of the Neighbourhood Plan.

James Bailey



Director
James Bailey Planning Ltd.
Tel: 07860 610 858
Email: james@jamesbaileyplanning.com

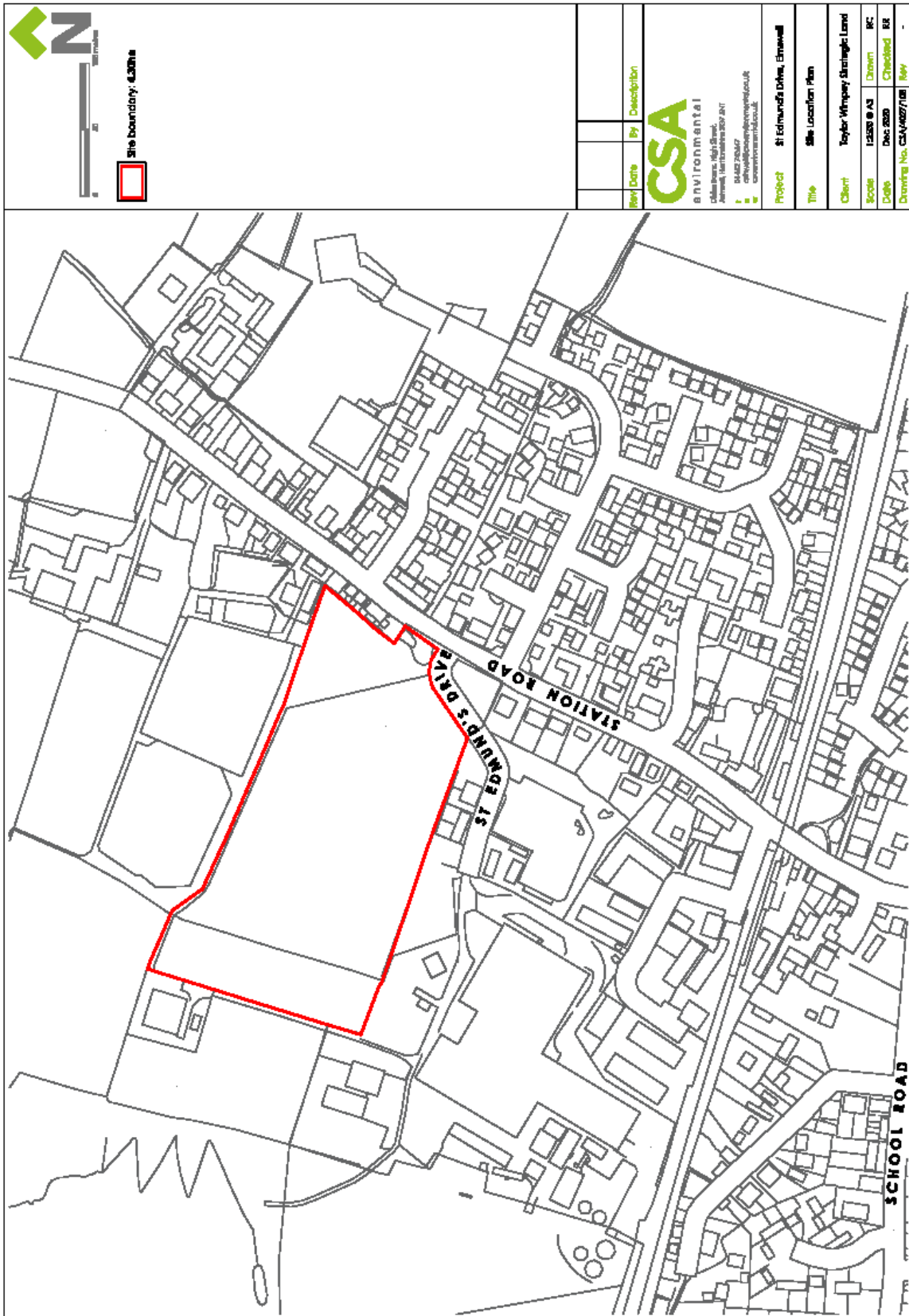


James Bailey
PLANNING

APPENDIX ONE: Site Location Plan



APPENDIX ONE - Site Location Plan





James Bailey
PLANNING

APPENDIX TWO: Opportunities & Constraints Plan



APPENDIX TWO – Opportunities & Constraints Plan





APPENDIX THREE: Comments Forms (x3)





Consultation Response Form

Elmswell Neighbourhood Plan 2022 - 2037

Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Elmswell Parish Council have prepared and submitted a Neighbourhood Plan which sets out a vision for the parish and contains policies which it intends will be used to help determine planning applications within the designated area.

The submission draft Neighbourhood Plan and other relevant documents can be found online by going to: www.midsuffolk.gov.uk/ElmswellNP

Printed copies of the submitted Plan are also available for viewing or for loan on request from the following locations in Elmswell: the Parish Clerks Office (Blackbourne Centre, IP30 9UH), the Wesley Coffee Shop (School Road, IP30 9BW), and Elmswell Library (Cooks Road, IP30 9BX).

If you are having difficulties accessing any of the consultation documents, call us on 0300 123 4000 (Option 5, then Option 4) during normal office hours so that we explore ways to help you.

HOW TO SUBMIT YOUR COMMENTS

All comments [representations] on this Plan must be submitted in writing and be received by no later than **4:00pm on Wednesday 26 April 2023**.

- **Complete Section One** in full so your comment(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comment(s) relate too. You may comment on more than one part of the Plan but please make this clear. Use separate forms if necessary.
- **E-mail your comments to:** communityplanning@baberghmidsuffolk.gov.uk
- **Post your comments to:** 'Elmswell NP Consultation,' c/o Spatial Planning Policy Team, Mid Suffolk District Council, Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX

It will not be possible to accept any late comments

At the end of the consultation period, all comments received will be collated and then forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may choose to seek clarity on certain matters.

Data Protection: All information collected and processed by the District Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended). All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our website or call customer services on (0300) 123 4000 and ask to speak to the Information Governance Officer.

Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	James Bailey
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Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Taylor Wimpey UK Ltd.
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Postcode:	MK3 5SD
Tel No:	
E-mail:	

Section Two: Your comment(s)

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

Paragraph No.		Policy No.	ELM 3
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications	✓	Have Comments	

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

It is noted that the Neighbourhood Plan has identified several Local Green Spaces across the village. It is considered these Green Spaces enhance the character of the village, and offer the community a place for social gatherings and/or recreational activities.

The approach being taken by the Neighbourhood Plan in Policy ELM 3 is therefore supported.

It is noted that the site off St. Edmunds Drive / Station Road is no longer included within the proposed Settlement Boundary (Policy ELM1) for Elmswell. However, the site remains available and would be well suited for future growth opportunities, especially given its central location within Elmswell and its immediate proximity to Taylor Wimpey's existing site, known as Kingsbrook Place. Importantly, the site is within a reasonable proximity to the community, it would remain accessible to the community and is local in character.

What improvements or modifications would you suggest?

If the land off St. Edmunds Drive / Station Road were to come forward for development in the future, then Taylor Wimpey would be willing to offer the western boundary of the site as a new Local Green Space under Policy ELM3.

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

Normally the Examiner will aim to consider the matter through the written representations.

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

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

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

N/A

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the Elmswell NP by Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed:	Dated: 26 th April 2023
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Section Two: Your comment(s)

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

Paragraph No.		Policy No.	ELM 2
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications	✓	Have Comments	

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

Policy ELM 2 – Protection of Important Views: *Important views from public vantage points either within the built-up area or into or out of the surrounding countryside are identified on the Policies Map. Any proposed development should not have a detrimental visual impact on the key landscape and built development features of those views as identified in the Neighbourhood Plan Assessment of Important Views*

Taylor Wimpey reaffirms their statement made in June 2022 regarding the wording of Policy ELM 2. The progression of the Neighbourhood Plan is supported, as is securing important views. However, any views must be properly and fully justified, and explained to the reader.

It remains the view of JBPL that the current wording of the Policy ELM 2 is open to interpretation and does not provide the reader with clear and defined guidance. Importantly, the Policies Map does not specify key features and characteristics within each identified view, that the Neighbourhood Plan has identified for protection. It is therefore questioned whether the evidence that is currently relied upon to support the Neighbourhood Plan actually meets the basic conditions tests, by contributing to sustainable development. There is neither sufficient nor proportionate information presented to guide development towards sustainable solutions, that would assist a decision taker on either what would or would not be acceptable at this location, or what would be needed to avoid a detrimental visual impact on the ‘important view’ as per the policy wording.

Taylor Wimpey therefore requests further consideration is given to the Appraisal of Important Views (January 2023) document that ‘supports’ Policy ELM 2. For example, View 4 specifically identifies existing industrial development that has already diminished this view. Similarly, View 6 includes a vista of overhead lines and transformer, a new housing development that is under five years old and post-war housing development that fronts the main road. We would therefore question what important features requires protection within these views?

What improvements or modifications would you suggest?

In line with the NPPF Paragraph 16, Plans should be prepared with the objectives of contributing to sustainable development, as well as serving a clear purpose. Therefore, if any of the specifically identified views, notably 4 and 6, cannot be justified in terms of a reason or feature for protection, then they should be removed from the Policies Map to ensure that the Neighbourhood Plan is sound and consistent with the NPPF.

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

Normally the Examiner will aim to consider the matter through the written representations.

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

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...
N/A
<i>(Continue on separate sheet if necessary)</i>

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

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the Elmswell NP by Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed:	Dated: 26 th April 2023
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Section Two: Your comment(s)

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

Paragraph No.		Policy No.	ELM 1
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support	<input checked="" type="checkbox"/>	Oppose	<input type="checkbox"/>
Support with modifications	<input type="checkbox"/>	Have Comments	<input type="checkbox"/>

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

The approach taken by the Neighbourhood Plan is consistent with the NPPF, in so far that it does not restrict development in being only inside the settlement boundary.

It is noted that the site off St. Edmunds Drive / Station Road is no longer included within the proposed Settlement Boundary (Policy ELM1) for Elmswell. However, the site remains available and would be well suited for future growth opportunities, especially given its central location within Elmswell and its immediate proximity to Taylor Wimpey's existing site, known as Kingsbrook Place.

What improvements or modifications would you suggest?

Taylor Wimpey's site remains: available; achievable; and deliverable. It may fit in well with ELM1 in the future if there should be a requirement for additional housing either within the village or district. It is respectfully requested the site is kept under review by the Neighbourhood Plan.

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

Normally the Examiner will aim to consider the matter through the written representations.

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

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

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

N/A

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the Elmswell NP by Mid Suffolk District Council	<input checked="" type="checkbox"/>

Signed:	Dated: 26 th April 2023
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James Bailey
PLANNING



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(6) PEGASUS GROUP obo Endurance Estates Strategic Land Ltd

Section One: Respondents Details

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

Part A: Respondent	
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Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Endurance Estates Strategic Land Ltd.
Address:	c/o Agent
Postcode:	c/o Agent
Tel No:	c/o Agent
E-mail:	c/o Agent

Section Two: Your comment(s)

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

Paragraph No.		Policy No.	
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications		Have Comments	

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

Please refer to accompanying Representations dated 25.04.23

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please refer to accompanying Representations dated 25.04.23

(Continue on separate sheet if necessary)

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

Normally the Examiner will aim to consider the matter through the written representations.

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

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

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

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	✓
The final 'making' (adoption) of the Elmswell NP by Mid Suffolk District Council	✓

Signed: R Barber

Dated: 25.04.23

25th April 2023

Elmswell NP Consultation, c/o Spatial Planning Policy Team
Babergh & Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX
communityplanning@babermidsuffolk.gov.uk

BY EMAIL ONLY

Dear Sir/Madam

Representations to the Submission Elmswell Neighbourhood Plan Consultation under Regulation 16 of the Neighbourhood Planning (General) Regulation, 2012 (as amended).

These representations are submitted by Pegasus Group on behalf of Endurance Estates Strategic Land Ltd. (EESL) in response to the Elmswell Neighbourhood Plan Regulation 16 Consultation (6th March – 26th April 2023). This response has been provided with due consideration of the consultation document (Submission Plan – January 2023) and its supporting material.

Our client previously submitted representations to the Regulation 14 consultation held between May and June 2022 by Elmswell Parish Council, which have been appended to this letter. The comments made within the previous representations remain and should, therefore, be referred to alongside this submission. EESL has been in discussions with Elmswell Parish Council in respect of "Land East of Eastern Way" and its potential for delivering residential development (up to 170 dwellings) and land for a primary school (2.4 ha) to support the aims and objectives of the Neighbourhood Plan. Full details of the Site are provided in the Promoter Document also appended to these representations.

It is acknowledged that some minor amendments have been made to the Submission Plan in line with comments received in response to the Regulation 14 consultation. It is, however, contended that further updates are required as detailed below and in the previous representations (Regulation 14) in order for the Plan to meet the requirements of the National Planning Policy Framework (2021 – 'the Framework') and ultimately the Basic Conditions of Schedule 4B of the Town and Country Planning Act 1990. These amendments relate principally to the proposed spatial/planning strategy and the need to provide greater flexibility and scope for development to come forward in the Plan period, in order to meet local community needs, addressing the social, economic and environmental elements of sustainable development detailed at paragraph 8 of the Framework.

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Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
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Sustainable Growth at Elmswell

The Plan's proposed Settlement Boundary is drawn tightly around the village envelope including only existing and committed development, other than the site "*Land North of Church Road*"; which was previously allocated (ref: LAO64) within the emerging Joint Babergh and Mid Suffolk Local Plan (JLP) for 60 dwellings (prior to the removal of all allocations from Part 1 of the Local Plan). The future of this site is currently unknown, as whilst the site is protected for housing by Mid-Suffolk Council's Housing Revenue Account (HRA), the Parish Council have suggested the land as a potential site for education uses. Notwithstanding this local ambition, EESL have not seen any plans or evidence to demonstrate that this is a viable or deliverable use for the land.

The wording of Neighbourhood Plan Policy ELM1 does not allow for development beyond the defined Boundary, other than where national and district level policies permit. As discussed above the future of "*Land North of Church Road*" is unknown and other Elmswell JLP allocation sites have been removed from any emerging policy status. Accordingly, to ensure that the Neighbourhood Plan is flexible and capable of responding to change, consideration should be given to including alternative sites on the edge of the village within the Settlement Boundary, particularly those located to the south of the village and those which are capable of providing new village infrastructure.

The proposed Settlement Boundary will restrict growth opportunities and limit the scope for new infrastructure to be delivered to support the existing community and those housing sites that are currently being built out in the village. There is an identified need for additional primary education infrastructure in the village (confirmed by Infrastructure Delivery Plan, part of the JLP evidence base) which the Neighbourhood Plan's spatial strategy does not robustly address. As such as detailed within our client's Regulation 14 representations it is contended that inclusion of "*Land East of Eastern Way*" within the Settlement Boundary would assist in facilitating a future proofed solution to primary education capacity issues within the village. Land for primary education infrastructure can come forward at this site if it is supported by an enabling residential development.

Including "*Land East of Eastern Way*" within the Settlement Boundary would allow the Neighbourhood Plan to set the agenda for growth and assist in the delivery of new education infrastructure at Elmswell. The site is located to the south of the railway line and is ideally placed to provide sustainable and proportionate growth to the village.

The following representations have been set out under the policies outlined within the Submission Neighbourhood Plan (January 2023).

Policy ELM1 – Planning Strategy

It is noted that that the Settlement Boundary has been amended to include "*Land to the East of Oak Lane*" for which outline planning permission was granted on 29.01.21 (LPA Ref: DC/20/05053 – 9 dwellings), as recommended within EESL's previous representations. It is recognised that the boundary has also been amended to remove "*Land West of Station Road*" to the west of the village



which was a proposed allocation (LA066) within the emerging Babergh and Mid Suffolk District Council Local Plan following the removal of all allocations from Part 1 of the Plan.

Nonetheless, the Settlement Boundary and wording of Policy ELM1 have not been further reviewed in response to EESL's previous representations (Regulation 14) which outlined the need for these to be reassessed to ensure flexibility across the Plan period. Given Elmswell's position in the settlement hierarchy (Core Village) and its inherent sustainability as a location to accommodate growth, the Neighbourhood Plan should provide the opportunity for development in sustainable locations within the village through Policy ELM1 and the Neighbourhood Plan more broadly. Thereby, ensuring the vitality and viability of Elmswell through the delivery of new market/affordable homes and opportunities for the expansion/enhancement of business and community facilities/infrastructure. The Submission Plan in its current form does not provide this flexibility and, therefore, does not align with the Framework's positive stance to development and consequently the Basic Conditions.

Policy ELM2 – Protection of Important Views

It is noted that the location of Viewpoint 6 on the Proposals Map has been moved from that shown during the Regulation 14 consultation such that it now lies closer to the Settlement Boundary. An updated 'Appraisal of Important Views (January 2023)' has been provided in support of the Regulation 16 Neighbourhood Plan which provides justification for this. This amendment does not conflict with the representations previously made which outlined our client's support for the protection of important views.

Policy ELM3 – Local Green Spaces

It is noted that "*Town Field, Off Spong Lane*" has been added since the Regulation 14 Plan, forming the ninth site protected under Policy ELM3. An updated 'Local Green Spaces Assessment (January 2023)' has been provided to accompany the Regulation 16 Neighbourhood Plan, which assesses and concludes that the above site qualifies for the Local Green Space Designation in the context of the requirements and tests set out at paragraphs 101 and 102 of the Framework. As such, Policy ELM3 remains consistent with the requirements of the Framework and meets with the Basic Conditions of Schedule 4b of the Town and Country Planning Act 1990 (as amended).

Policy ELM4 – Open Space, Sport and Recreational Facilities

It is noted that the playing fields to the south of Grove Lane have not been identified on the Policies Map despite EESL's previous recommendation within their Regulation 14 representations. This recommendation remains along with the other points previously outlined in respect of insufficient flexibility within the spatial strategy/Settlement Boundary (Policy ELM 1), thereby impacting upon the potential for delivery of new, and expansion of existing facilities across the Plan period.



Policy ELM5 – Employment Sites

It is noted that the wording of the above policy has been amended such that 'financial' evidence and a timeframe for the marketing of premises (minimum period of 6 months) are required to support the conversion of existing employment/business uses to non-employment uses. This amendment does not conflict with EESL's previous representations which outlined support for the Policy's objective to encourage the retention and development of existing and other business uses provided that they do not detrimentally impact upon the surrounding area. As detailed above and within the Regulation 14 representations it is contended that Policy ELM1 be reviewed to ensure that the spatial strategy is flexible enough to support the aims of Policy ELM5.

Conclusion

It is considered that further review of the Neighbourhood Plan's proposed spatial strategy is required through amendments to the Settlement Boundary and the wording of Policy ELM1 to ensure a robust Plan that will positively guide development and address the changing needs of the community across the Plan period. Hence, the Plan should not preclude development coming forward in otherwise sustainable locations adjacent to Elmswell's urban edge such as "*Land East of Eastern Way*" which would meet with the Framework's overarching objectives detailed at paragraph 8, and therefore, the Basic Conditions.

We trust that these representations which include those documents appended (Regulation 14 representations and Site Promotion Document) submitted on behalf of our client Endurance Estates Strategic Land Ltd., will be useful and considered during examination of the Regulation 16 Neighbourhood Plan.

Should you wish to discuss the content of these representations and, or "*Land East of Eastern Way*" promoted by our client, please do not hesitate in contacting me.

Yours sincerely,

Robert Barber

Executive Director

Email: robert.barber@pegasusgroup.co.uk

Telephone: 01223 202100

Enc. Regulation 14 Elmswell Neighbourhood Plan including Site Promoter Document

**REPRESENTATIONS TO THE REGULATION 14
CONSULTATION ON THE ELMSWELL
NEIGHBOURHOOD PLAN**

On behalf of Endurance Estates Strategic Land Ltd.

Date: June 2022 | Pegasus Ref: P17-2726



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	30.06.22	RB/OJ	RB	



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Appendix 1 – Land East of Eastern Way, Elmswell – Site Promoter Document



1. Introduction

- 1.1. These representations to the submission Elmswell Neighbourhood Plan (Regulation 14) (hereafter referred to as 'the NP') are made by Pegasus Group on behalf of Endurance Estates Strategic Land Ltd. (EESL). EESL has been in discussions with Elmswell Parish Council in respect of "*Land East of Eastern Way*" (hereafter referred to as 'the Site') and its potential for delivering residential development and land for a primary school; please refer to the Promoter Document included at Appendix 1 for full details of the Site.
- 1.2. The Site presented covers an area of approximately 12.5ha and is suitable for a range of uses, those proposed include:
 - Residential development of up to 170 dwellings (developable area of 5.6ha), of different sizes, types and tenures, including affordable housing;
 - 2.4ha of land capable of delivering a two-form entry primary school (with an additional 0.6ha of land set aside for future expansion should it be necessary);
 - Public open space including dedicated play spaces, informal landscaped areas, landscape buffers around the edges of the Site, and Sustainable Drainage Systems;
 - Associated vehicular and pedestrian accesses and other infrastructure.
- 1.3. The Site promoted by our client offers a sustainable and deliverable solution to increasing primary education infrastructure in the village to support the housing growth identified in the Babergh and Mid Suffolk Joint Local Plan. It would also future proof the ability of the village to support any further growth within and beyond the plan period.
- 1.4. EESL welcomes this formal consultation on the submission version of Elmswell Neighbourhood Plan and would like to commend the Parish Council for their work on the NP. We would like to confirm our client's support for the emerging NP, but also take the opportunity to comment where it is considered that changes are required to ensure a more robust document that covers the plan period.

2. Legal Requirements and Planning Policy

Legal Requirements

- 2.1. These representations are framed in the context of the Basic Conditions relevant to the preparation of a Neighbourhood Plan as set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended), as follows:
- Having regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses;
 - Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area;
 - Contributing to the achievement of sustainable development;
 - General conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - Does not breach, and is otherwise compatible with retained EU obligations; and
 - Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

National Planning Policy Framework

- 2.2. The National Planning Policy Framework (the Framework) sets out the Government's expectations of plan-making and decision-taking in a way that achieves sustainable development and delivers positive growth (see Ministerial forewords).
- 2.3. It emphasises the need to secure economic, social and environmental benefits, and at its core is the presumption in favour of sustainable development. It details the requirements for the preparation of neighbourhood plans to be in alignment with the strategic objectives of the wider area and the role which they play in the achievement of sustainable development.

Adopted Development Plan

- 2.4. In order to meet the aforementioned Basic Conditions and criteria set out within the Framework, neighbourhood plans should be prepared in alignment with the overarching strategic policies detailed within the Adopted Development Plan.
- 2.5. The Adopted Development Plan relevant to the preparation of the Elmswell NP includes the following documents:

- Mid Suffolk Core Strategy (adopted 2008) and subsequent Focused Review (adopted 2012);
- Mid Suffolk Local Plan (adopted 1998) – strategic policies are superseded by the Core Strategy, but development management policies remain in force.

Emerging Development Plan

- 2.6. Mid Suffolk District Council and Babergh District Council (BMSDC) are preparing a joint Local Plan (JLP). The emerging JLP proposes to designate Elmswell as a Core Village. Following the suspension of the JLP examination hearings in October 2021, the Inspectors wrote to the Council outlining their concerns regarding the soundness of the Plan and its associated evidence base. The Inspectors expressed concerns over several matters which included the site appraisal and selection process, the spatial strategy for the distribution of development and the Sustainability Appraisal process. To remedy the significant flaws in the JLP the Inspectors recommended that this be converted into a Part 1 Plan, which contains strategic policies only and to prepare a Part 2 which would then come forward to allocate development sites and distribute development across the two districts.
- 2.7. An exploratory meeting between the Planning Inspectors and Council Officers was held on the 16th December 2021. At this meeting the Council agreed, in principle, to take onboard the recommendations of the Inspectors and will now proceed with work to modify the JLP so that it becomes a Part 1 Plan only.
- 2.8. An updated Local Development Scheme is yet to be published and an anticipated date for adoption of either part of the JLP is, therefore, not yet confirmed.

3. Review of the Elmswell Neighbourhood Plan

3.1. These representations are made to the current consultation (11th May – 1st July 2022) on the pre-submission version of the Elmswell NP under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.

3.2. This section highlights the key issues that EESL wishes to raise and seeks to provide recommendations for ensuring that the NP fully complies with the requirements of national policy. For ease of reference, the following reflects the structure of the accompanying Consultation Response Form.

Question 1 – Do you support Policy ELM1 – Spatial Strategy?

3.3. It is acknowledged that the settlement boundary outlined incorporates the land parcels proposed for allocation through the JLP and the majority of sites which have extant planning permissions, however, our client considers that Policy ELM1 in its current form would preclude development coming forward in otherwise sustainable locations adjacent to Elmswell's urban area. Whilst the settlement boundary proposed may cater for the current needs of the village, the tightly drawn boundary will arbitrarily restrict growth opportunities and limit scope for addressing the requirements of the future.

3.4. In addition, "*Land to the East of Oak Lane*" for which outline planning permission was granted on 29.01.21 (LPA Ref: DC/20/05053) for 9 dwellings has not been included within the boundary shown on the Policies Map proposed. Similarly, whilst "*Land East of Warren Lane and West of Cresmedow Way*" (LPA ref: 4909/16) which has planning permission for 38 dwellings lies within the settlement boundary outlined, the extended area currently being considered under application LPA ref: DC/21/02956 for 44 dwellings does not fall within the proposed boundary in its entirety. The latter application was recommended for approval at Planning Committee on 09.03.22 but deferred to allow for further work to be undertaken. Nonetheless, it is suggested that the settlement boundary be amended to reflect the permissions/applications referenced above.

3.5. Given Elmswell's position in the settlement hierarchy (Core Village) and its inherent sustainability as a location to accommodate growth, the Parish Council should explore the opportunity to positively direct development in sustainable locations within the village through Policy ELM1 and the NP more broadly. This would, ensure the vitality and viability of Elmswell through the delivery of new market/affordable homes and opportunities for the expansion/enhancement of business and community facilities/infrastructure through the plan period and beyond.

3.6. As such, it is contended that the policy at present is contrary to the Framework's overarching aim and approach to growth demonstrated by its presumption in favour of sustainable development and, therefore, does not meet with the conditions of Schedule 4b of the Town and Country Planning Act 1990 (as amended). It is recommended that the proposed



settlement boundary and wording of Policy ELM1 be reviewed to ensure flexibility across the plan period and align with the Framework's positive stance to development.

Question 2 – Do you support Policy ELM 2 – Protection of Important views?

- 3.7. The draft NP identifies two public vantage points on the Policies Map either within the built-up area or into or out of the surrounding countryside which are to be protected under Policy ELM 2. In addition to the Suffolk Landscape Character Assessment, a separate assessment has been used to identify the views selected. Our client agrees with the principle of ensuring that development does not have a detrimental visual impact on these important views, recognising the role of Landscape and Visual Impact Assessments in decision making, and, therefore, supports Policy ELM 2.

Question 3 – Do you support Policy ELM 3 – Local Green Spaces?

- 3.8. Our client supports the approach detailed in Policy ELM 3 for the designation of Local Green Spaces (LGS) within Elmswell. The Framework sets out at Paragraph 101 that designation of land as LGS should be consistent with the sustainable development of the local area. Paragraph 102 goes on to set out the three tests that must be aligned with to enable designation of LGS, as follows:

- 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.

- 3.9. As evidenced within the NP a LGS Appraisal has been completed and only those green spaces which meet with the above criteria have been designated under Policy ELM3. The Policy is, therefore, consistent with the requirements of the Framework and meets with the conditions of Schedule 4b of the Town and Country Planning Act 1990 (as amended).

Question 4 – Do you support Policy ELM 4 – Open Space, Sport and Recreation Facilities?

- 3.10. Our client supports the principles outlined in Policy ELM 4 for the provision, enhancement and/or expansion of sports/recreation open space and facilities for Elmswell. However, as contended in response to Question 1, the settlement boundary proposed at present does not provide sufficient land for the delivery of any new facilities or the expansion of those existing in the future.
- 3.11. The text which accompanies Policy ELM 4 recognises the importance of sport and recreation provision for residents of all ages, yet the spatial strategy outlined in Policy ELM 1 does not provide sufficient flexibility for future delivery should it be required across the plan period. As such it is recommended that Policy ELM 1 is subject to further review, in order to better support the objectives of Policy ELM 4.

- 3.12. Furthermore, it is queried as to why the Playing Fields located to the south of Grove Lane, have not been identified on the Policies Map? These fields are an important recreational facility used by the local community and should, therefore, be afforded the protection that Policy ELM4 provides. As such, it is recommended that the Policies Map be amended to incorporate these fields alongside those at Blackbourne Community Centre which have already been identified on the Map.

Question 5 – Do you support Policy ELM 5 – Employment Sites?

- 3.13. Our client supports Policy ELM 5's objective to encourage the retention and development of existing and other business uses provided that they do not have a detrimental impact upon the surrounding area. However, as referenced throughout these representations Policy ELM 1 should be reviewed for the aforementioned reasons to ensure that the spatial strategy is flexible enough to support the aims of Policy ELM 5.

Question 6 – Do you have any additional comments on the Draft Neighbourhood Plan?

- 3.14. Whilst Policy ELM 4 covers proposals for the protection and enhancement of open space, sports and recreation facilities, there is limited reference to other necessary community facilities/services which are required to ensure that growth within the village remains sustainable or that these facilities/services should be maintained and/or enhanced for the benefit of residents in the longer term.
- 3.15. In addition, there is a recognised lack of primary school capacity in Elmswell at present and the NP does not seek to address this. Work is currently underway to expand the existing primary school from 315 to 420 pupil places, providing two-form entry from September 2022. Nonetheless, whilst this expansion will assist in the short term, it will accommodate growth from just four of the five proposed residential allocations identified within the JLP. As the school site measures only 1.85ha in area and is constrained by existing development on all sides, there is no potential for further growth beyond that which has already been committed. Suffolk County Council and BMSDC propose that the remaining growth be accommodated at the new primary school in Woolpit. It is, however, understood that securing provision outside of Elmswell is not supported by local residents. BMSDC's Infrastructure Delivery Plan (IDP) states that a new A14 bridge/link will be delivered to provide safe access to this new school from Elmswell. The IDP, however, confirms that there is an unknown funding shortfall for this project and therefore its delivery must remain in doubt. In the absence of a safe pedestrian/cycle route and the journey distance, it is likely that car use will dominate. Hence, it is considered that the Councils' solution as proposed, would promote unsustainable travel patterns contrary to the objectives of national policy.
- 3.16. The most sustainable solution to increasing primary education capacity in Elmswell is to deliver a new primary school within the village. Land East of Eastern Way provides this opportunity with sufficient space for the allocation of land for the delivery of a school. Initial layout testing shows that the Site would be able to accommodate a two-form entry primary school (circa 2.4ha), with a further 0.6ha of land available to allow for any future expansion. In addition, there would be sufficient space to deliver dedicated areas for parking within the



Site, which the existing primary school is not able to provide, resulting in unsafe on road parking during drop-off and pick-up times.

- 3.17. The western boundary of the Site is approximately 1km (or a ten-minute walk) from the majority of key services within the village including the existing school, shop, post office and railway station. The proposed location of the school would mean that the facility would be well located for existing residents with easy access for both pedestrians and cyclists; thereby integrating the school into the community and aiding social cohesion within the village, in alignment with the Framework's objective of promoting healthy and safe communities (Chapter 8). Furthermore, the provision of these safe pedestrian and cycle routes would reduce any potential traffic impact. In addition, the location of the Site to the south of the railway line would limit the impact upon the level crossing and possible congestion in the centre of the village. It is, therefore, considered that the Site would offer an easily accessible, deliverable and positive solution to school provision in Elmswell.
- 3.18. The capacity of education infrastructure is a vital consideration for any growing community and the NP provides the opportunity to allocate land for the delivery of such a facility. As such, the Parish Council should consider either amending the settlement boundary to incorporate additional land within the village envelope or to adjust the wording of Policy ELM 1 such that there is the potential for development to come forward outside of the defined boundary, adjacent to the settlement where new community facilities could be delivered. Our client would be happy to discuss further this issue with the Parish Council, to ascertain whether they can assist in ensuring Elmswell has the necessary education infrastructure across the plan period.

4. Summary and Conclusion

- 4.1. Whilst EESL supports many of the aims of the policies in principle, it is considered that modifications to the NP should be incorporated to ensure that the plan is fit for purpose and flexible enough to react positively to changes that may occur over the plan period. The settlement boundary is drawn tightly around the village envelope and the current wording of Policy ELM 1 does not allow for development beyond the defined boundary, other than where national and district level strategic policies permit. Yet as detailed in these representations there is an identified need for additional education infrastructure and the NP in its current form does not facilitate this by providing space for the delivery of this use or, indeed, other community facilities, which may be required to ensure the sustainable growth of the village. As contended above, inclusion of *'Land East of Eastern Way'* within the settlement boundary would safeguard a site in a highly sustainable location, offering a positive and future proofed solution to primary education capacity issues within the village.
- 4.2. Whilst in general conformity with the objectives of national policy the NP arguably at present does not meet with the Framework's overarching aim to ensure sustainable development. As such, it is considered that the NP does not meet all the Basic Conditions of Schedule 4B of the Town and Country Planning Act 1990. It is, therefore, recommended that the Parish Council review the proposed spatial/planning strategy to provide greater flexibility and scope for development to come forward in the plan period which meets with local community needs, addressing the social, economic and environmental elements of sustainable development detailed at paragraph 8 of the Framework.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Cambridge

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SITE PROMOTER DOCUMENT - UPDATE

LAND EAST OF EASTERN WAY, ELMSWELL

ON BEHALF OF
ENDURANCE ESTATES STRATEGIC LAND LTD

Prepared by
PEGASUS GROUP

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1. INTRODUCTION

- 1.1 This Site Promotion Document has been prepared by Pegasus Group on behalf of Endurance Estates Strategic Land Ltd (EESL) which is promoting land east of Eastern Way, Elmswell, for residential development of up to 170 dwellings (@ 30 dwellings per hectare) and land for a new primary school.
- 1.2 EESL is a Cambridgeshire based property company specialising in land promotion that works predominantly in the East Anglian region to promote land for residential development. Endurance Estates works in partnership with landowners, Councils and local stakeholders to bring forward land for new housing development. The company organises the delivery of technical work to promote sites through the planning process and support allocations for development.
- 1.3 This document sets out the site, its development potential, and its sustainability credentials. It explains why the site should be allocated to deliver residential development and land for a primary school.

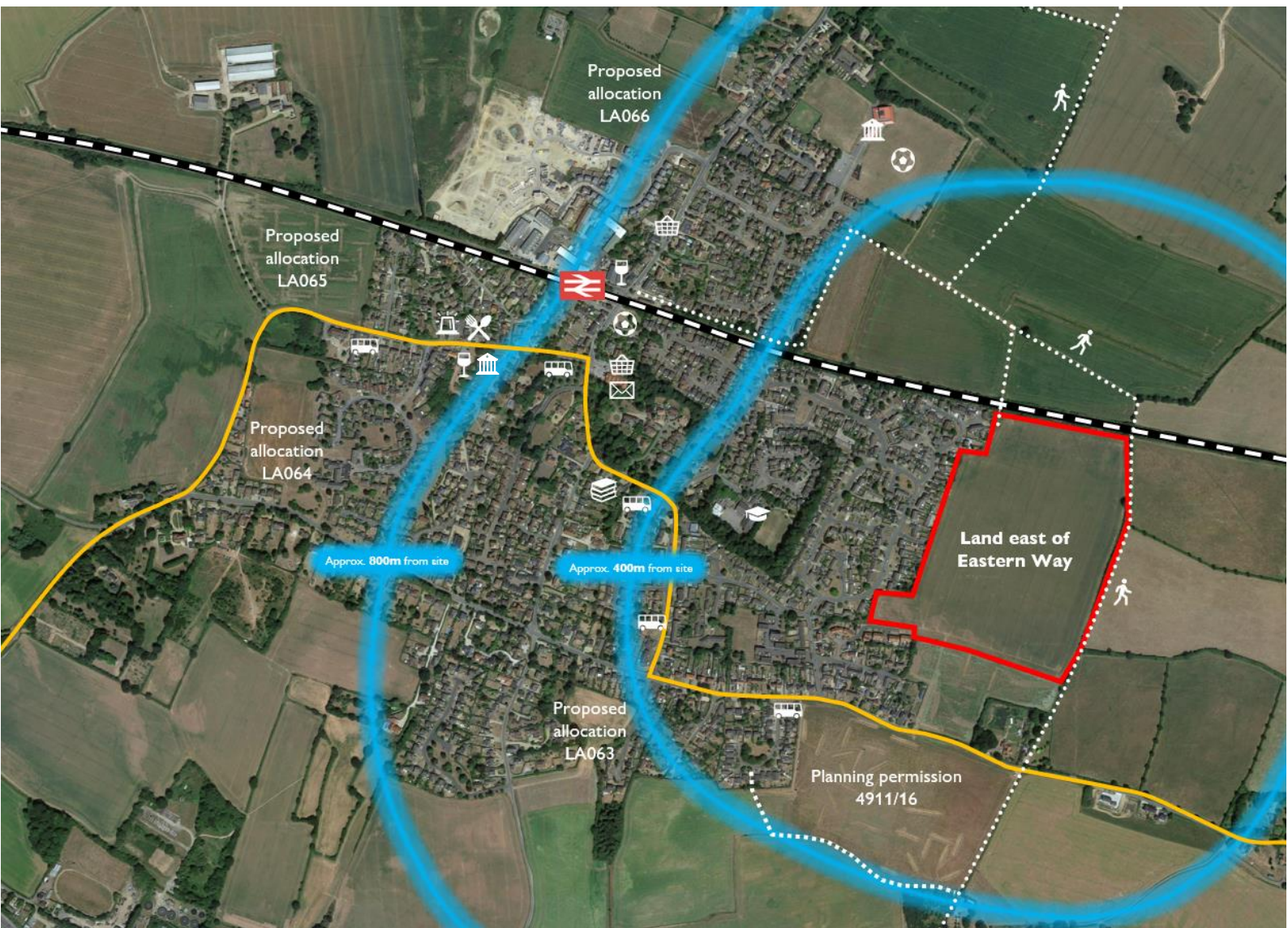
2. SUSTAINABILITY OF ELMSWELL

2.1 Elmswell is a village with a population of 3,950 (as at the 2011 Census) located around 8 km to the north-west of Stowmarket and 14km east of the regional centre of Bury St Edmunds.
















2.2 Elmswell is identified in the Babergh and Mid Suffolk emerging Joint Local Plan (JLP) as a Core Village, reflective of its previous status as a Key Service Centre in the Core Strategy (2008). The JLP explains that Core Villages will “*act as a focus for development*” alongside the Market Towns and the Ipswich Fringe. The JLP also highlights Elmswell’s location within the key Transport Corridor in Mid Suffolk.

2.3 Elmswell has a wide range of local services and facilities, which include:

- East of England Co-operative supermarket with post office; and other grocery stores;
- The Blackbourne community centre, which includes a sports hall and rooms for hire by sporting and community groups, as well as sports pitches (including cricket and football pitches), a bowls green, play areas, multi-use games area and mini-gym
- Public house;
- Wesley Community Hall;
- Elmswell Community Primary School;
- Little Elms Pre-School;
- Elmswell Library;
- Places of worship;
- Allotments;
- Other local services including a takeaway restaurant, hairdresser, travel agency.



FACILITIES PLAN

	Site Boundary		Bus stop
	Primary School		Bus routes (384 / 385)
	Shop		Railway station
	Post Office		Public footpath
	Library		Approx. 400m / 800m distance from site boundary
	Emergency services		
	Takeaway		
	Public house		
	Play area / sports pitches		
	Community hall		

Transport connections

- 2.4 Elmswell railway station receives an hourly service in each direction between Cambridge and Ipswich calling at all intermediate stations. Services run from around 5.30am to 11.30pm Monday – Saturday with a reduced Sunday service. Connections are available at Bury St Edmunds for services towards Peterborough, Cambridge for services to Stansted Airport, and at Stowmarket and Ipswich for intercity services to Norwich and London. The franchise operator, Greater Anglia, is presently introducing new Swiss-built Stadler Flirt trains on the route with more capacity and high-tech features such as wi-fi and charging points. It is expected that these will achieve a ‘step change’ in the quality and perception of service, encouraging more passengers to use the train.
- 2.5 Elmswell also receives local bus services on Galloway routes 384 and 385 between Bury St Edmunds and Stowmarket, calling at intermediate villages. These combine to provide a number of departures throughout the day at roughly 90-minute intervals. Apart from the first and last services of the day, these are all provided on a commercial basis without public subsidy.
- 2.6 Elmswell lies on the A14 trunk road, which provides fast regional links towards Bury St Edmunds and the Midlands, and Ipswich and the Suffolk ports.

Employment

- 2.7 There are several employment locations in and around Elmswell. These include the established trading estate to the north of the railway station; a recently-constructed warehousing and office development on the Old Stowmarket Road (off junction 47a of the A14); and a business park in the neighbouring village of Woolpit.

3. THE PROPOSAL

3.1 Land east of Eastern Way and north of Wetherden Road, Elmswell has a site area of approximately 12.5ha and is suitable for a range of different uses. In summary, the scheme includes:

- Residential development of up to 170 dwellings (developable area of 5.6 ha), of different sizes, types and tenures, including affordable housing;
- 2.4ha of land capable of delivering a 2-form entry primary school (with an additional 0.6ha of land set aside for future expansion should it be necessary).
- Public open space including dedicated play spaces, informal landscaped areas, landscape buffers around the edges of the site, and Sustainable Drainage Systems
- Associated vehicular and pedestrian accesses and other infrastructure.

3.2 The Concept Plan at the end of this section shows how the proposed development could come forward at the site.

New housing

3.3 In common with other authorities in the East of England, Mid Suffolk has a high need for new homes and a lengthy waiting list for affordable housing. This is in the context of a widely-acknowledged housing crisis, where the Government has committed to boosting delivery of housing to 300,000 dwellings per annum across England.

3.4 A shortage of housing affects households on a day-to-day basis; it affects the cost of housing for both buyers and renters; the availability of appropriate housing in suitable locations; and the availability of affordable housing.

3.5 In Mid Suffolk, median house prices stood at 9.46 times median workplace-placed earnings in 2018. Mortgages are typically offered on up to 4.5 times an individual's earnings. A household with two earners would therefore likely access a mortgage of 9 times an individual's earnings. In the case of Mid Suffolk, the latest affordability data indicates that this cannot be achieved.

3.6 The JLP presents an opportunity to deliver a significant increase in the supply of housing in Mid Suffolk, both on the open market and for affordable tenures such as affordable rented

housing and shared ownership schemes. Land east of Eastern Way can make a meaningful contribution, delivering 170 dwellings.

Education Infrastructure

- 3.7 There is a recognised lack of primary school capacity in Elmswell at present. The existing primary school is capable of being expanded from 315 to 420 pupil places. This expansion scheme is only capable of accommodating pupil growth arising from four of the five proposed JLP residential site allocations. The growth arising from the remaining allocation is proposed to be accommodated at a new primary school in Woolpit. The Infrastructure Delivery Plan (IDP) states that a new A14 bridge/link will be delivered to provide safe access to this new school from Elmswell. However, the IDP confirms that there is an unknown funding shortfall for this project.
- 3.8 The most sustainable solution to increasing primary education capacity in Elmswell is to deliver a new primary school in the village. Land east of Eastern Way can deliver land for a new primary school. The Concept Plan within this document identifies an indicative location of land for a two-form entry primary school (circa 2.4ha), with a further 0.6ha of land available to allow for any future expansion. This solution will aid social cohesion and interaction in the village and not require pupils to travel to Woolpit.
- 3.9 Whilst the Concept Plan shows an indicative location for the primary school land to the south of the site, the final positioning will be informed by stakeholder and public consultation as part of the masterplanning process.

Public open space






- 3.10 The scheme will provide public open space throughout the site, serving a range of different purposes. Walking routes can be provided, integrated into the wider network of public rights of way in the area. Open space can also be landscaped with plant species and landscape features selected to promote biodiversity, taking into account ecologists' recommendations.

Access

- 3.11 Vehicular access can be taken from Wetherden Road. As part of the existing planning permission 4911/16 (currently being built by Crest Nicholson) two vehicular accesses have been constructed leading northwards from Wetherden Road. These two roads can be continued into the site.
- 3.12 There is potential to provide pedestrian access at two points along Eastern Way:
- The first is the Public Right of Way to the north-western corner of the site, where Footpath 25 passes through the site for a short distance, providing a link between Eastern Way and the railway footbridge. There is also a northward connection here towards the north of Elmswell and the Blackbourne community hall and sports facilities.
 - The second is at the south-western corner of the site, where the field extends to the edge of Eastern Way.
- 3.13 There is also a pedestrian link approved under application 4911/16 linking the Crest Nicholson development to Jubilee Terrace.



CONCEPT PLAN

-  Site Boundary
-  Indicative location of primary school land
-  Vehicular and pedestrian access, already approved
-  Potential pedestrian access
-  Public rights of way

4. TECHNICAL WORK

Landscape and visual impact

- 4.1 The promotion site lies on gently sloping land (approximately 65m AOD to the north-west and 60m AOD to the south-east) which is currently in use as an arable farmed field. A topographical survey has been carried out which shows the land falling from a high point of approximately 65m AOD to the north-western corner, to around 62m AOD around the eastern boundary, and 60m AOD towards the far south-eastern corner. The site presents the opportunity, subject to a full assessment of landscape and visual constraints and opportunities, to provide an appropriate scheme which responds to the constraints and opportunities at the site.
- 4.2 Development of the site also provides an opportunity to create a softer landscaped edge to the built-up area of Elmswell, creating a more attractive transition between village and countryside. At present, dwellinghouses along Eastern Way typically back onto the open countryside with little by way of landscaping to soften their appearance. This results in a 'hard' edge to the settlement, particularly visible from the railway line. If the site is developed, it is possible to provide landscaped buffers around the edges of the site and to achieve a 'fair faced' development with housing in perimeter blocks facing outwards towards the countryside.

Heritage impact

- 4.3 The site is relatively unconstrained by heritage considerations. There are three dwellings eastwards of the site, approximately 410 – 450m distant, which are listed at Grade II (Mutton Hall, Little London Farmhouse and Pulhams Cottage). It is anticipated that impacts of any development at the site on these Listed Buildings can be mitigated through careful design. It is noted that for application 4911/16 (adjacent to land east of Eastern Way and north of Wetherden Road), no concerns were raised by the Council in respect of heritage considerations.

Ecology

4.4 An Ecological Assessment of the site was undertaken in late summer 2018. This survey identified three main habitat types; arable land, grassland margins, and hedgerows. The survey also considered the potential for protected species on the site, including

- Bats
- Badgers
- Dormice
- Birds
- Reptiles
- Great Crested Newt

4.5 In respect of each of these species, the Ecological Appraisal concluded the site was of limited habitat value. In respect of invertebrates, the Ecological Appraisal concluded it would be likely there is an assemblage of common invertebrate species at the site.

4.6 The Ecological Appraisal goes on to consider potential recommendations. These include opportunities to provide ecological enhancement through landscaping measures and inclusion of features such as nest boxes and log piles.

Drainage and flood risk

4.7 The site lies wholly within Environment Agency Flood Zone 1, meaning it is at minimal risk of flooding from rivers. EA mapping shows that localised parts of the site, particularly along the western boundary and towards the south-eastern corner, are at risk of surface water flooding.

4.8 The risk of surface water flooding can be mitigated through the implementation of a surface water drainage strategy. There is sufficient space within the site to provide Sustainable Drainage System features where appropriate, in order to keep surface water run-off rates at greenfield levels.

5. SITE CHARACTERISTICS AT A GLANCE

Site characteristic	Designations and Physical Features
Existing Use	Managed arable farmland
Neighbouring land uses	Residential to south and west Open countryside to north and east Cambridge – Ipswich railway runs to the north of the site
Public rights of way	Footpath passes to western boundary of site with a foot crossing of the railway immediately north of the site
On-Site Planning Designations	No relevant planning designations
Flood zone	Flood Zone 1 (i.e. lowest risk of flooding and sequentially preferable location for residential development)
Landscape designations	No relevant policy designations
Trees	No Tree Preservation Orders
Contamination	Given the existing use of the site the risk of contamination is considered low, subject to surveys
Heritage assets	Nearest listed buildings around 410 – 450 metres ways (Mutton Hall, Little London Farmhouse and Pulhams Cottage, all listed at Grade II) Not in a conservation area No scheduled monuments on site
Ecological designations	The site is not subject to any statutory or local ecological designations
Protected species	The site is of limited habitat value for protected species. The Ecological Appraisal makes a number of relevant recommendations to be addressed through the scheme design

6. CONCLUSION

- 6.1 This Site Promoter Document should be read in conjunction with Endurance Estates Strategic Land's representations on the pre-submission version of the Elmswell Neighbourhood Plan under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.
- 6.2 It is clear that in the wider context of Mid Suffolk district, Elmswell is a sustainable location for growth with good access to the regionally-significant road and rail routes which pass through Mid Suffolk. Elmswell has a good range of local services and accordingly holds status as a Core Village in the emerging JLP.
- 6.3 The Land east of Eastern Way is a logical location to deliver new housing development and land for a new primary school. It lies adjacent to the existing built-up form of Elmswell and is well-related to the settlement with several opportunities to provide access to the south, east and north of the site. A review of site technical matters, indicates there are no clear constraints to development that could not be fully addressed through careful scheme design. The delivery of the land for the primary school will unlock the ability to deliver sustainable growth in Elmswell over the plan period.
- 6.4 As such, it is strongly recommended that land east of Eastern Way and north of Wetherden Road, Elmswell, is allocated for development.

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(7) ElmsWild

Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	Mary Feeney
Job Title (if applicable):	
Organisation / Company (if applicable):	ElmsWild
Address:	
Postcode:	
Tel No:	
E-mail:	

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

Section Two: Your comment(s)

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

Paragraph No.	3.9,3.10	Policy No.	ELM3
----------------------	----------	-------------------	------

Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications		Have Comments	X

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

Please be as brief and concise as possible ..

1. ElmsWild fully endorses the comments made by Suffolk Wildlife Trust and Suffolk County Council in the previous consultation, specifically:

- Concern that there is limited reference to how the NP will protect and enhance the natural environment and biodiversity within the parish
- The Plan should be expanded to include a new policy to make good this gap
- Concern that the NP does not contain any strategies or policies for the natural environment, biodiversity or climate change
- This omission is “surprising” and “unusual” given the challenges the world faces (and we would also add that Elmswell faces).

2. There is a disappointing lack of detail, in relation to both known habitats and species recorded in the parish, and also in making a case for protecting those sites that are listed. This applies across the board – public access, ecological significance and historical significance. This information is available from organisations such as SBIS, Suffolk Naturalists Society and from the local knowledge of volunteers. Elmswell-specific data IS important as it strengthens the case for protection and gives a local perspective on national or regional policies which inevitably take a more broad brush approach.

3. Ambition and aspiration are lacking (this applies to the entirety of the NP, but ElmsWild is concentrating on this section which is our specific area of interest). The NP will help determine the future of the village over the next 15 years and should show the strategies and policies that will make Elmswell a better place to live. The SWT comments that “Elmswell NP is a chance to shape wildlife enhancement and biodiversity net gain within the parish to best benefit people and wildlife, making the parish a better place to live and improving access to nature for everyone”. The minimalist approach taken means that this chance will be missed. The opportunities listed by SWT – habitat creation, linking and buffering of existing sites, improving access for people, future green spaces, wildlife corridors – are absent from the Plan.

4. There is no mention of Green Infrastructure, which includes open spaces, parks, playing fields, woodlands, allotments, street trees, water bodies and private gardens. All of these features do exist in Elmswell but they are not mapped. Providing a map would identify all GI assets in the village, show how they link together, indicate where there are gaps, and provide opportunities for enhancing and creating new assets and for improved connectivity. Without this, it will be difficult to work together with developers to really enhance the local environment.

5. In the previous consultation ElmsWild drew attention to several important omissions in the list of green spaces to be designated. While we are pleased to now see Town Field included, we are still mystified as to the continued exclusion of Kiln Meadow and the Memorial Garden. We do not agree that Kiln Meadow does not meet the criteria (not explained), while the Memorial Garden is not mentioned at all. It is now even more important to include the latter, following the recent establishment of a tree nursery, wildflower area and small orchard on the land adjoining the library next to the Garden. There is no mention of the potential for creating wildlife corridors to combat the trend towards small, isolated wildlife sites which is what we have now. Nor is there mention of connectivity between sites to improve public access. For example, it would be hugely beneficial for both people and wildlife to create a link between Lukeswood and Kiln Meadow.

6. More omissions have been highlighted by other commenters, especially the new allocation to the south of the St John's Mead development in Wetherden Road and the fields adjacent to Pightle Close/School Road. We also agree that the St John's Mead land should be listed. We are aware that the future of the School Road fields is currently undecided. However, there is very strong feeling amongst residents that this site should not be built on and should remain accessible as green space. It is very well-used for walking, dog-walking and informal recreation – and these uses are likely to grow with the new houses being built on the other side of School Road. The small area of scrub/woodland which used to be the school playground is potentially of high biodiversity value. These fields, with views across to the Parish Church and surrounding fields, are the closest we have to a 'village green' and we think that this should be acknowledged by designation in the NP as green space. These, and other missing green spaces (Eastern Way, Rowan Green, William Armstrong Close and Gardener's Walk) should feature in a Green Infrastructure plan, indicating opportunities for enhancement (e.g. wildflower sowing, tree planting) and improved connectivity.

7. Brownfield sites can often be of high biodiversity value. Although Elmswell has already lost many of these, some remain, and the NP should specify that any developments should avoid adverse impacts and ensure that special features or habitats are sensitively conserved. Examples include the old school playing field on the corner of School Road and the garden of the Tavern pub.

8. There is no mention of protecting existing trees, planting new trees and the contribution they make to providing shade in a heating climate as well as mitigating air pollution from increasing traffic volumes. The Notable oak tree on School Road was protected after a struggle, but there are others within the village that should be noted and mapped. A recent BMSDC study put the canopy cover of the Elmswell/Woolpit ward at 8.5%, nearly half the average for England. Canopy cover for Elmswell alone, once the wooded areas of Woolpit Green and Borley Green are taken out of the equation, is likely to be even lower. The study recommends a target of 15% cover, rising to 20%. The NP should be addressing this issue to make sure that trees are not lost to development and that all new developments make a significant contribution to making good the shortfall.

9. It should be noted that on p.10 of the Local Green Spaces Assessment the ownership of Town Field should be Elmswell Poor's Land Charity, not Elmswell Parish Council.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

This section should be expanded, with perhaps a second policy, which states that the NP aims to meet the challenges of the biodiversity and climate crises, that it aims to protect and enhance the natural environment of the village, and details the strategies that will help to achieve this over the next 15 years.

This section should indicate how the NP will make Biodiversity Net Gain work in the specific Elmswell context, making use of local data, setting high expectations for new developments. There should be an aspiration for 20% BNG, as advocated by SWT.

A Green Infrastructure map/plan would be very beneficial in showing both existing assets which must be conserved and enhanced, alongside potential for creating new assets and improving connectivity. The GI map will also show where access to green space is limited or lacking within the village and where acquisition of new green space would be particularly beneficial in creating wildlife corridors or protecting scarce habitats or species.

This policy should include ALL the sites that have been highlighted as missing by previous comments, especially Kiln Meadow, Memorial Garden/library, School Road/Pightle Close fields and St John's Mead, and ensure that their assessment is properly covered in sufficient detail.

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

Normally the Examiner will aim to consider the matter through the written representations.

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

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

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

Please be as brief and concise as possible ..

The Neighbourhood Plan offers a rare opportunity to protect and enhance our green spaces which have no other designation or protection. It should be taken advantage of to secure the best possible outcomes for both people and wildlife. This issue is very important to local residents and should be discussed at a public hearing.

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

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Elmswell NP by Mid Suffolk District Council	X

Signed: *Mary Feeney*

Dated: 26 April 2023

(8) RESIDENT - HARVEY

Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	Mr K [REDACTED] Harvey
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	[REDACTED]
Postcode:	[REDACTED]
Tel No:	[REDACTED]
E-mail:	[REDACTED]

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

Section Two: Your comment(s)

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

Paragraph No.	Local Green Spaces Assessment.	Policy No.	
----------------------	--------------------------------	-------------------	--

Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support	Oppose
Support with modifications	Have Comments Yes

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

The ecological significance and, in some instances historical importance, of many of the Green Spaces listed is still not recognised adequately. There are a number of other areas of importance that are not acknowledged (see my previous comments and those of others) Suffolk Wildlife Trust comments / concerns should be valued and taken on board.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

This Neighbourhood Plan is an opportunity to enhance the natural environment for the future. Please do not let the opportunity pass by.

(Continue on separate sheet if necessary)

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

Normally the Examiner will aim to consider the matter through the written representations.

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

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

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

The importance of Green Spaces in our increasingly busy and fast moving world. I do not feel that the N P as it stands recognises this adequately.

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	Yes
The final 'making' (adoption) of the Elmswell NP by Mid Suffolk District Council	Yes

Signed: K M Harvey	Dated: 26 April 2023
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(9) RESIDENT - MOGRIDGE

Part A: Respondent	
Title / Name:	M, S J [REDACTED] MOGRIDGE
Job Title (if applicable):	[REDACTED]
Organisation / Company (if applicable):	[REDACTED]
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Tel No:	[REDACTED]
E-mail:	[REDACTED]
Part B: Agents - Please complete details of the client/ company you represent	
Client / Company Name:	[REDACTED]
Address:	[REDACTED]
Postcode:	[REDACTED]
Tel No:	[REDACTED]
E-mail:	[REDACTED]

Etnswelt NP Submission Consultation (6 March to 26 April 2023)

Section Two: Your comment(s)

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

Paragraph No. Policy No. ELM3 - LOCAL GREEN SPACES
3.10 - APPENDIX 1 - HALL LANE PLAY AttA

Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support/

Oppose

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

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Additional Green / Amenity open Space
on St. Edmunds Drive - opposite
Nos 17 - Already in use as an
amenity space with bench &
sympathetic planting. This is
not included as part of
the policy for ELM3.

(Continue on separate sheet if necessary)

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

Normally the Examiner will aim to consider the matter through the written representations.

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

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

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

Please be as brief and concise as possible ..

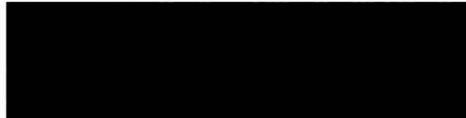
(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner

The final 'making' (adoption) of the Elmswell NP by Mid Suffolk District Council .../"

Signed: Dated:



10 / (2-0 2.J:

Elmswell NP Submission Consultation (6 March to 26 April 2023)

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(10) RESIDENT - ROGERS

Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	Jason Rogers
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	██████████ ██████████ ██████████
Postcode:	██████████
Tel No:	██████████
E-mail:	████████████████████

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

Section Two: Your comment(s)

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

Paragraph No.		Policy No.	ELM2
----------------------	--	-------------------	------

Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications	X	Have Comments	X

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

The underlying principle of policy ELM2 is sound, in its purpose to preserve and protect what could be argued are unique and important views within and around Elmswell. The concern is the way in which this policy is worded. As it currently reads, the policy is very broad in nature and identifies nothing specific or unique in relation to the views or landscapes which is based on the Appraisal of Important Views report which is a list of views which are general and subjectively important. The policy states 'key landscape and built development features'. What is key about these is not specific or held to criteria to determine their significance objectively. This in effect creates a blanket importance to any and all views or landscapes that are found in or around Elmswell.

Planning policy and law has long established that there is no right to a private view and so therefore no material consideration should be given to a loss of view when making planning decisions. There is a difference in public views, which by their very nature are of public interest and therefore should be given material consideration in planning decisions.

By having a policy that in effect makes all views and landscapes of public interest would give the potential to restrict all development based on very subjective judgements and assessments. It could also allow for challenge to planning decisions due to the policy not clearly defining what landscapes and views are key, therefore making the policy redundant.

Further to this, areas that are identified on the Appraisal of Important Views report are all outside the proposed settlement boundary and are therefore afforded a greater degree of protection by virtue of Policy ELM1.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

To avoid the situation which creates all but a blanket policy of any and all views being of significance and importance, this policy needs to be refined so that there are clear criteria as to the landscapes and views in and around Elmswell that are considered to be unique and important. This would then allow the application of these criteria to planning decisions and ensure that they have the ability to allow for development that should be approved and hold if, and when, challenged.

This policy should have greater alignment to district and national policy that already exists and is being developed, such as policies HB1-14 (to be superseded by Joint Local Plan LP21), NPPF 79, 184 - 202 and CL2 – 24 (to be superseded by Joint Local Plan LP17, 18, 19, 22, 24), NPPF 83, 112 – 116, 127, 149, 170 – 172, 174 – 177.

(Continue on separate sheet if necessary)

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

Normally the Examiner will aim to consider the matter through the written representations.

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

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

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

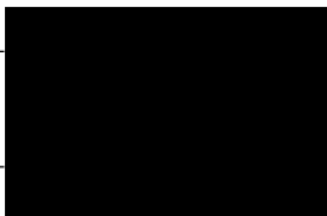
Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Elmswell NP by Mid Suffolk District Council	X

Signed:



Dated: 9 March 2023

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(11) RESIDENT – SPENCER

MSDC Note: This representation comprises a complete response form received on 24 April and an additional comments document received on 26 April.

Section One: Respondents Details

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

Part A: Respondent	
Title / Name:	Mrs J Spencer
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	<div style="background-color: black; width: 100%; height: 1.2em; margin-bottom: 2px;"></div> <div style="background-color: black; width: 100%; height: 1.2em;"></div>
Postcode:	<div style="background-color: black; width: 100%; height: 1.2em;"></div>
Tel No:	<div style="background-color: black; width: 100%; height: 1.2em;"></div>
E-mail:	<div style="background-color: black; width: 100%; height: 1.2em;"></div>

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

Section Two: Your comment(s)

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

Paragraph No.		Policy No.	ELM3
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications		Have Comments	X

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

Please be as brief and concise as possible ..

Local Green Spaces: Town Field off Spong Lane is still not included also Kiln Meadow, the Church Yard, the Memorial Garden and land at St John's Mead These should be listed , with maps and details. All the sites have ecological value

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Use the information provided by Elmswild and others, it will help to protect the sites and their wildlife. Take note of the comments submitted by Suffolk Wildlife Trust and Suffolk County Council (Natural environment).

(Continue on separate sheet if necessary)

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

Normally the Examiner will aim to consider the matter through the written representations.

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

The decision on whether to hold a hearing is entirely at the discretion of the Examiner.

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

Please be as brief and concise as possible ..

The Plan is too brief. Why not include the information available? Don't rely on the new Joint Local Plan. Belt and Braces. The environment is too precious to risk any shortfall in protection, for residents and wildlife alike.

(Continue on separate sheet if necessary)

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

The publication of the recommendations of the Examiner	x
The final 'making' (adoption) of the Elmswell NP by Mid Suffolk District Council	x

Signed: J Spencer

Dated: 24.4.23

Additional comments received by email on 26 April 2023

Elmswell Neighbourhood Plan Consultation

Policy No. ELM3, Paragraph No. 3.9, 3.10

Have comments

Details

1. I fully endorse the comments made by Suffolk Wildlife Trust and Suffolk County Council in the previous consultation, specifically:

- Concern that there is limited reference to how the NP will protect and enhance the natural environment and biodiversity within the parish
- The Plan should be expanded to include a new policy to make good this gap
- Concern that the NP does not contain any strategies or policies for the natural environment, biodiversity or climate change
- This omission is “surprising” and “unusual” given the challenges the world faces (and we would also add that Elmswell faces).

2. There is a disappointing lack of detail, in relation to both known habitats and species recorded in the parish, and also in making a case for protecting those sites that are listed. This applies across the board – public access, ecological significance and historical significance. This information is available from organisations such as SBIS, Suffolk Naturalists Society and from the local knowledge of volunteers. Elmswell-specific data is important as it strengthens the case for protection and gives a local perspective on national or regional policies which inevitably take a more broad brush approach.

3. Ambition and aspiration are lacking (this applies to the entirety of the NP, but I am concentrating on this section which is my specific area of interest). The NP will help determine the future of the village over the next 15 years and should show the strategies and policies that will make Elmswell a better place to live. The SWT comments that “Elmswell NP is a chance to shape wildlife enhancement and biodiversity net gain within the parish to best benefit people and wildlife, making the parish a better place to live and improving access to nature for everyone”. The minimalist approach taken means that this chance will be missed. The opportunities listed by SWT – habitat creation, linking and buffering of existing sites, improving access for people, future green spaces, wildlife corridors – are absent from the Plan.

4. There is no mention of Green Infrastructure (GI), which includes open spaces, parks, playing fields, woodlands, allotments, street trees, water bodies and private gardens. All of these features do exist in Elmswell but they are not mapped. Providing a map would identify all GI assets in the village, show how they link together, indicate where there are gaps, and provide opportunities for enhancing and creating new assets and for improved connectivity. Without this, it will be difficult to work together with developers to really enhance the local environment.

5. In the previous consultation attention was drawn to several important omissions in the list of green spaces to be designated. While I am pleased to now see Town Field included, I am still mystified as to the continued exclusion of Kiln Meadow and the Memorial Garden. I do not agree that Kiln Meadow does not meet the criteria (not explained), while the Memorial Garden is not mentioned at all. It is now even more important to include the latter, following the recent establishment by Elmswild of a tree nursery, wildflower area and small orchard on the land adjoining the library next to the Garden. There is no mention of the potential for creating wildlife corridors to combat the trend towards small, isolated wildlife sites which is what we have now. Nor is there mention of connectivity between sites to improve public access. For example, it would be hugely beneficial for both people and wildlife to create a link between Lukeswood and Kiln Meadow.

6. More omissions have been highlighted by other commenters, especially the new allocation to the south of the St John's Mead development in Wetherden Road and the fields adjacent to Pightle Close/School Road. We also agree that the St John's Mead land should be listed. I am aware that the future of the School Road fields is currently undecided. However, there is very strong feeling amongst residents that this site should not be built on and should remain accessible as green space. It is very well-used for walking, dog-walking and informal recreation – and these uses are likely to grow with the new houses being built on the other side of School Road. The small area of scrub/woodland which used to be the school playground is potentially of high biodiversity value. These fields, with views across to the Parish Church and surrounding fields, are the closest we have to a 'village green' and I think that this should be acknowledged by designation in the NP as green space. These, and other missing green spaces (Eastern Way, Rowan Green, William Armstrong Close and Gardener's Walk) should feature in a Green Infrastructure plan, indicating opportunities for enhancement (e.g. wildflower sowing, tree planting) and improved connectivity.

7. Brownfield sites can often be of high biodiversity value. Although Elmswell has already lost many of these, some remain, and the NP should specify that any developments should avoid adverse impacts and ensure that special features or habitats are sensitively conserved. Examples include the old school playing field on the corner of School Road and the garden of the Tavern pub.

8. There is no mention of protecting existing trees, planting new trees and the contribution they make to providing shade in a heating climate as well as mitigating air pollution from increasing traffic volumes. The Notable oak tree on School Road was protected after a struggle, but there are others within the village that should be noted and mapped. A recent BMSDC study put the canopy cover of the Elmswell/Woolpit ward at 8.5%, nearly half the average for England. Canopy cover for Elmswell alone, once the wooded areas of Woolpit Green and Borley Green are taken out of the equation, is likely to be even lower. The study recommends a target of 15% cover, rising to 20%. The NP should be addressing this issue to make sure that trees are not lost to development and that all new developments make a significant contribution to making good the shortfall.

Improvements/modifications

This section should be expanded, with perhaps a second policy, which states that the NP aims to meet the challenges of the biodiversity and climate crises, that it aims to protect and enhance the

natural environment of the village, and details the strategies that will help to achieve this over the next 15 years.

This section should indicate how the NP will make Biodiversity Net Gain work in the specific Elmswell context, making use of local data, setting high expectations for new developments. There should be an aspiration for 20% BNG, as advocated by SWT.

A Green Infrastructure map/plan would be very beneficial in showing both existing assets which must be conserved and enhanced, alongside potential for creating new assets and improving connectivity. The GI map will also show where access to green space is limited or lacking within the village and where acquisition of new green space would be particularly beneficial in creating wildlife corridors or protecting scarce habitats or species.

This policy should include ALL the sites that have been highlighted as missing by previous comments, especially Kiln Meadow, Memorial Garden/library, School Road/Pightle Close fields and St John's Mead, and ensure that their assessment is properly covered in sufficient detail.

Hearing

The Neighbourhood Plan offers a rare opportunity to protect and enhance our green spaces which have no other designation or protection. It should be taken advantage of to secure the best possible outcomes for both people and wildlife. This issue is very important to local residents and should be discussed at a public hearing.

[Ends]

(12) MR LIVALL

E from: Mr Livall
Rec'd: 24 April 2023
Subject: Elmswell Neighbourhood Plan Submission Plan 2022-2037 Representations

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

Elmswell Neighbourhood Plan Submission Plan 2022-2037 Representations

Dear Mr Bryant

I have recently had the pleasure of viewing the Elmswell Neighbourhood Plan Submission Plan 2022-2037 [January 2023]. I note that the Plan does not provide up-to-date biodiversity information in accordance with the National Planning Policy Framework. A supporting Biodiversity Evaluation Report has not been provided and in this respect the Elmswell Neighbourhood Plan compares most unfavourably with the recent Hoxne Neighbourhood Plan Reg 16 Submission consultation (15 Feb to 31 Mar 2023) which contains a 45 page Evaluation Report: <https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Hoxne-NP-SD8-Landscape-Biodiversity-Evaluation.pdf>

The omission of a supporting Biodiversity Evaluation Report / Ecological Assessment / Parish Biodiversity Action Plan with the Submission Plan is most disappointing and fails to recognise the national concerns expressed by Sir David Attenborough and others highlighting that "nature is in crisis" and the desire for local action. I have become increasingly concerned that some Parish Councils may choose [*perhaps on the grounds of financial expediency, insufficient time or lack of ecological expertise*] not to use or give any weight to the relevant biodiversity guidance and tools at their disposal. Biodiversity regrettably appears to still remain a soft option that may give rise to negative responses both from Parish Councils and their professional advisors.

I make a number of objections to the Reg 16 Submission Plan [<https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Elmswell-NP-Sub-Draft-Jan23.pdf>], all of which relate to biodiversity.

Objection 1:

The Submission Plan fails to recognise or relate to national concerns that "nature is in crisis".

Refer: United Nations Environment Programme [<https://www.unep.org/facts-about-nature-crisis>] and UK's People's Plan for Nature [<https://www.weforum.org/agenda/2023/04/attenborough-people-s-plan-nature-uk/>].

Objection 2:

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

Objection 3:

The Parish Council has not provided evidence that it is accurately assessing and promoting “the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species.” *The Submission Plan therefore does not accord with the relevant sections of the National Planning Policy Framework [namely Paras 8, 28, 31, 174, 175 and 179].*

Objection 4:

The Parish Council has not provided a core policy covering biodiversity along with appropriate supporting evidence. *The Submission Plan therefore does not accord with the relevant sections of the National Planning Policy Framework [namely Paras 8, 28, 31, 174, 175 and 179].*

Objection 5:

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

Footnote: A key theme emerging currently in Neighbourhood Plans is "climate change" and the "climate emergency". The only reference to "climate change" in the Submission Plan is a single mention in Para. 2.2 relating to a quote from the NPPF.

"Neighbourhood Planning Toolkits & Guidance - How to write a neighbourhood plan in a climate emergency" [February 2020] provides a very useful guide to policy writing and community engagement for low-carbon neighbourhood plans. Reference: <https://neighbourhoodplanning.org/toolkits-and-guidance/how-to-write-a-neighbourhood-plan-in-a-climate-emergency/>

If the Parish Council is able to address the objections that I have raised it will establish a much stronger policy framework for emerging development proposals that may impact upon the biodiversity resource of the Parish, in particular wildlife corridor / hedgerow connectivity. I am aware that to date Elmswell has been the subject to a number of large housing schemes.

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

Kind regards

Richard Livall

[Ends]

(13) Late rep: Historic England



Miss Caileigh Gorzelak
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Rd
Ipswich
Suffolk
IP1 2BX

Direct Dial: [REDACTED]

Our ref: PL00774482

28 April 2023

Dear Miss Gorzelak

Ref: Elmswell Regulation 16 Neighbourhood Plan Consultation

Thank you for inviting Historic England to comment on the above consultation.

Unfortunately we do not currently have capacity to provide detailed comments on the Submission version of this plan. We would refer you to any detailed comments we may have made at earlier stages of the plan's production including Regulation 14 and where it was required, SEA screening/scoping and draft report stages.

Our detailed advice on successfully incorporating historic environment considerations into neighbourhood plan, alongside some useful case studies, can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

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

Please do contact me, either via email or the number above, if you have any specific queries arising following this stage, and we will endeavour to assist at that time.

Yours sincerely,

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

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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