

Mid Suffolk District Council



Wetheringsett cum Brockford NP 2022 - 2037

Reg 16 Submission consultation responses

On 6 December 2022, Wetheringsett cum Brockford 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 23 January until Friday 10 March 2023.

Nine representations were received in total. This includes a representation from the Defence Infrastructure Organisation, obo the MOD which arrived late on the 10 March but, as it contains information that may be helpful, is included here as duly made rep.

All are listed below and copies are attached.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Mid Suffolk District Council
(3)	Mendlesham Parish Council
(4)	Natural England
(5)	Historic England
(6)	Anglian Water
(7)	National Highways
(8)	Mr Livall
(9)	Defence Infrastructure Organisation, obo the MOD

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(1) SUFFOLK COUNTY COUNCIL

Date: 09 March 2023
Enquiries to: Georgia Teague
Tel: [REDACTED]
Email:
neighbourhoodplanning@suffolk.gov.uk



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

Dear Ms Caileigh Gorzelak,

Submission Consultation version of the Wetheringsett cum Brockford Neighbourhood Plan

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

SCC welcome the changes made to the plan in response to comments made at the Regulation 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~~.

SCC have no specific comments, relating to the Basic Conditions, on the Reg16 Consultation version of the Neighbourhood Plan at this time, however, SCC do wish to note an issue with the Design Code as detailed below.

During the Reg14 consultation, SCC had made some comments on the Design Code. These comments focused on replacing “public footways” terminology with “*the public rights of way*” network, as public footways constitute a significantly narrower terminology than SCC believes is intended – by omitting bridleways and open/all-access byways – and should be referred to as public footpaths rather than public footways. Footways generally are a different category altogether referring to pavements alongside roads.

Whilst the Consultation Statement indicated that “AECOM have amended the Design Code accordingly”, this has not been the case for each of the suggested amendments to the document.

On page 55, Figures 40 and 42 should read as “*public rights of way*” not as “public footways”, as this is incorrect terminology.

SCC also note that the incorrect “public footways” terminology still occurs elsewhere in the document, on page 50 in the second to last bullet point, and on page 30 in the first “issues to be addressed” bullet point.

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) MID SUFFOLK DISTRICT COUNCIL

Our ref: W'sett cum Brockford NP R16 Response
Dated: 10 March 2023

From: Planning Policy Team, BMSSDC
To: Janet Cheesley (Wetheringsett NP Examiner)
cc: NP Steering Group

Dear Janet,

1. Wetheringsett cum Brockford Neighbourhood Plan 2022 - 2037 **2. Reg 16 Submission Consultation – Comments from Mid Suffolk District Council**

This response is made for and on behalf of Robert Hobbs (Corporate Manager for Strategic Planning at Babergh & Mid Suffolk District Councils).

The District Council welcomes the changes that have been made to the Wetheringsett cum Brockford Neighbourhood Plan (the 'WcB NP') in response to our previous consultation response.

There are still some areas where we feel that the WcB NP can be further improved, or which may simply have been overlooked during the submission preparation. We set these out as succinctly as possible in the appended table and, subject to your agreement, propose that many of these fall into the category of minor modifications.

We trust that all of our comments are helpful.

Yours sincerely

Caileigh Gorzelak
Strategic Planning Policy Officer
Babergh & Mid Suffolk District Councils
T: 01449 724595
E: communityplanning@baberghmidsuffolk.gov.uk



Babergh and Mid Suffolk District Councils
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Reg 16 Submission draft Wetheringsett cum Brockford NP 2022 - 2037

Comments and further observations from Mid Suffolk District Council

Joint Local Plan	<p>The penultimate sentence in para 1.17 states that: '<i>Part 1 with modifications is expected to be published in Autumn 2022</i>'.</p> <p>While this may have been correct at the time of writing the date has passed and, for now, we suggest: '<i>...expected to be published in 2023</i>.'</p>
WCB1	<p>As amended, policy WCB1 broadly follows the suggested wording put forward in our R14 response.</p> <p>In the third paragraph we propose a further amendment based on additional feedback from planning colleagues. Instead of saying "...<i>enhance the area's form</i> ...", (where enhance implies a desire for continual improvement) it has been suggested that this could be quite restrictive and that "... <i>enhance <u>or maintain</u> the area's form, [etc]</i> .." would allow a more flexibility in decision making.</p>
WCB2	A reminder to the Group that the footnote to this policy should read: SHELAA
WCB3	The first paragraph should refer to 'settlement boundaries <u>ies</u> ' (plural), as should the first sentence in paragraph 5.63.
WCB6	For similar reasons to those expressed in our comment on WCB1, we suggest that the second paragraph in policy WCB6: Design Principles be amended to read " .. <i>seek to enhance <u>or maintain</u> its quality.</i> "
Trees para 7.18	<p>Our Biodiversity Officer has commented on the subtle but important difference between Veteran Trees and Ancient Trees, and advise that the description in para 7.18 more closely aligns with the latter. To avoid confusion, it is suggested that para 7.18 be amended to read:</p> <p><i>"In addition there are records for a number of Veteran Trees within the parish. <u>These are trees that may not be very old but have significant features that contribute to their exceptional biodiversity, cultural or heritage value.</u> The parish host 33 ... [etc.]"</i></p>
WCB10	<p>We have not commented on this previously. Our Biodiversity Officer has pointed out that Fig 20 does not show 'Ecological Networks' but, based on the description provided by the DEFRA Magic Map web application, a more appropriate title might be 'Ecological Network Enhancement Area'.</p> <p>This would then feed in more appropriately to WCB10 c) which set out that:</p> <p>c) the restoration and reparation of fragmented ecological networks to be targeted within the area highlighted in Figure 20.</p>
WCB11	<p>Local Green Space # 6: Former Football Field at Hockey Hill</p> <p>Our previous (Reg 14) comments on this site are reproduced on page 103 (line 90) of the Consultation Statement.</p> <p>We only report at this stage that the appeal decision [ref no. APP/W3520/W/22/3292871] has not yet been issued, so the future of this site remains in the balance.</p>

Page 78	<p>Chapter 7 concludes with a list of Environmental Projects. Para 1.5 of the Plan sets out how the Parish Councils intends to bring these projects forward.</p> <p>While beyond the scope of this iteration of the WcB NP, our Public Realm team have identified a number of opportunities where the Parish Council could add further value by, for example, mapping and benchmarking the condition of identified green spaces, priority habitats, hedgerows and grass verges. Additionally, the NP could also identify opportunities for the enhancement of these spaces.</p> <p>If this is something that the Parish Council are interested in, with a view to incorporating the outcomes in a future review of their Plan, we would be happy to discuss that at the appropriate time.</p>
Other observations	<ul style="list-style-type: none"> • Page 30 - 31: We note that the paragraph numbering jumps from 5.15 to 5.17. Amending this will have a knock-on effect through for the rest of Chapter 5. • Para 5.21: Typo. This should read “In Summer 2021 ...”

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(3) MENDLESHAM PARISH COUNCIL

E from: Mendlesham Parish Council

Rec'd: 14 February 2023

Subject: R16 Consultation - Wetheringsett Cum Brockford Neighbourhood Plan

Dear Paul,

Mendlesham Parish Council has reviewed and supports the proposed Neighbourhood Plan for Wetheringsett Cum Brockford with no further comments.

Thank you for bringing this consultation to our attention.

Regards
Sharon

Sharon Jones
Parish Clerk for Mendlesham Parish Council
<http://mendlesham.suffolk.cloud>

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(4) NATURAL ENGLAND

Date: 02 March 2023
Our ref: 419655
Your ref: Wetheringsett cum Brockford



Mr R Hobbs
Babergh and Mid Suffolk District Councils
communityplanning@babergmidsuffolk.gov.uk

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

T 0300 060 3900

BY EMAIL ONLY

Dear Mr Hobbs

Regulation 16 of the Wetheringsett cum Brockford

Thank you for your consultation on the above dated 20 January 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 Regulation 16 of the Wetheringsett cum Brockford 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 sincerely

Joanne Harrison
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/index.cfm)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/>



Historic England

Miss Caileigh Gorzelak
Babergh and Mid Suffolk District Councils
(by email)

Direct Dial: [REDACTED]

Our ref: PL00737802
9 March 2023

Dear Miss Gorzelak

Ref: Wetheringsett-cum-Brockford Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: [<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>](https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/)

We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk [<mailto:eastplanningpolicy@historicengland.org.uk>](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed 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 queries.

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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(6) ANGLIAN WATER

E fm: Tessa Saunders | Spatial Planning Advisor
Rec'd: 6 February 2023
Subject: RE: Consultation on R16 Wetheringsett cum Brockford N'hood Plan (MSDC)

Dear Community Planning,

Thank you for inviting comments on the Reg.16 consultation for the Wetheringsett cum Brockford Neighbourhood Plan. Anglian Water is the statutory sewerage undertaker for the designated neighbourhood plan area, and supports the objectives and policies contained therein, where they align with our purpose, strategic direction and long term ambitions.

We make the following points in relation to specific policies and the design guidelines:

WCB6 Design Principles

Anglian Water welcomes the policy requirement for sustainable drainage systems to be integrated into development, and the encouragement to incorporate sustainable and environmental design including rainwater harvesting and permeable hard surfacing. This helps to reduce surface water run-off and the risks of inundation of our sewer network and sewer flooding incidents.

WCB10: Protecting and enhancing biodiversity

We support the policy acknowledgement regarding SuDS and the multi-functional benefits they can provide in terms of enhancing biodiversity and pollution control, as part of a framework of green/blue infrastructure provision.

WCB11: Local Green Spaces

We note that Local Green Spaces - LGS 3, 4, 6, 7 and 9 include our foul drainage network assets, namely sewers and/or rising (pumped) mains. However, we consider that that the national policy approach towards Green Belts will enable us to undertake any operational works to our assets that intersect with these spaces.

Design Guidelines

We support the Design Guidelines addressing sustainable drainage network encompassing water ponds and existing blue infrastructure.

3.4.5 Vehicle parking - support the use of porous materials for driveways to minimise surface water run-off

3.5.1 Sustainable drainage systems (SuDS) - welcome addition of this section to guide approaches to managing surface water is a more sustainable way including rainwater/stormwater harvesting and promotion of nature-based solutions to enhance biodiversity.

3.5.2 Eco-design - we welcome the approach to overall energy efficiency in new development and retrofit opportunities for existing development where it incorporates methods that refer to installation of highly water efficient (not waste-efficient as quoted in F.118) devices, and more ambitious water efficiency standards. This not only reduces energy and water consumption (better

outcomes for customers' bills) but also reduces operational carbon emissions in the development, and the treatment and supply of water and recycling of resulting wastewater.

I would be grateful if you could acknowledge receipt of this response.

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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(7) NATIONAL HIGHWAYS



Wetheringsett NP Consultation
Mr P Bryant
Spatial Planning Policy Team
Babergh & Mid Suffolk District Councils,
Endeavour House,
8 Russell Road,
Ipswich, IP1 2BX

Operations (East)
National Highways
Woodlands
Manton Lane
Bedford MK41 7LW

10 March 2023

Via Email:
communityplanning@baberghmidsuffolk.gov.uk

Dear Sir/Madam,

Public Consultation on the Wetheringsett-cum-Brockford Neighbourhood Development Plan Submission– Regulation 16 of the Neighbourhood Plans (General) Regulations 2012

National Highways welcomes the opportunity to comment on the Regulation 16 consultation of the Wetheringsett-cum-Brockford Neighbourhood Development Plan Submission which covers the plan period from 2022 to 2037.

National Highways 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 Wetheringsett-cum-Brockford Neighbourhood Development Plan Submission, our principal interest is in safeguarding the operation of the A14 in the area, which is located within the vicinity of to the parish to the south and west. The nearest junction with the SRN is to the south, at A14/ A140 Junction 51, Beacon Hill Interchange, approximately 9km to the south of the parish boundary.

We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Development Plan for Wetheringsett-cum-Brockford Parish Council is required to be in general conformity with the strategic policies of the development plan which comprises of the draft Babergh and Mid Suffolk Joint Local Plan 2018-2037 currently

under consultation (BMSJLP), the adopted Suffolk Minerals and Waste Locals Plan (2020), adopted Mid Suffolk Local Plan (1998), the adopted Mid Suffolk Core Strategy (2008), and the adopted Mid Suffolk Core Strategy Focused Review (2012) Town and Country Planning Regulations 2012 and the National Planning Policy Framework (2021).

The parish in relation to this Neighbourhood Plan document is rural in nature, based on the population census data from 2011, the parish has approximately 669 residents in 263 households and 280 dwellings. Also, there is no existing significant developments in the parish of residential, employment or commercial land uses which generate significant trip attraction/ generation which impact the local SRN network.

The document makes reference to the draft BMSJLP in relation to the local housing requirement, however the document did not contain a specific housing requirement figure for the parish, however, the draft document did make two specific housing allocation within the parish at Brockford Street, both allocations made reference to 10 dwellings each, therefore suggesting nominal impact on the local highway network. In addition, based on the Housing Land Supply Position Statement published by Mid Suffolk in September 2022 (for consultation), the document indicated the district to have a 10.88-year housing land supply against its requirement of 5years, consequently the document notes the housing requirement within the parish to have been accommodated and therefore the Neighbourhood Plan has not been compelled to make any further provisions. Instead, the document includes some guidance on how new housing should be shaped for the future and promoting active modes of travel (Policy WCB1, WCB2).

The Plan notes some key commercial/ business zones within the parish, that will be monitored in line with the Neighbourhood Policy Plan. Policy WCB4 proposes support for small scale new business uses at the existing employment locations within the parish, based on the existing scale of these we do not consider these to have an impact on the SRN. However, it is of keynote; National Highways is consulted on a regular basis in relation to any new developments or changes to schemes that could have potential impact on the SRN in the area.

We consider that the Wetheringsett-cum-Brockford Neighbourhood Development Plan is not expected to have any significant impacts on the operation of the SRN in the area due to the limited level of growth proposed across the Parish, which is envisaged by the Neighbourhood Plan, it is considered that the policies set out within the documents are unlikely to cause a severe impact on the operation or capacity of the SRN.

Henceforth, we have no further comments to provide and trust that the above is useful in the progression of the Wetheringsett-cum-Brockford Neighbourhood Development Plan.

Yours sincerely,

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

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(8) MR LIVALL

E from: Mr Livall
cc: Cllr Andrew Stringer (MSDC), Cllr Jessica Fleming (MSDC); Stoke Ash & Thwaite and Wetheringsett cum Brockford Parish Council
Rec'd: 5 February 2023
Attached: Wetheringsett cum Brockford Biodiversity Statement

FAO Wetheringsett cum Brockford NP Consultation, c/o Spatial Planning Policy Team

Dear Mr Bryant

I have recently had the pleasure of viewing the Wetheringsett cum Brockford Neighbourhood Plan 2022-2037 Submission Draft (December 2022) and can see that some positive steps are being taken by the community in policy terms to protect and enhance biodiversity in the parish of Wetheringsett cum Brockford.

I make three objections to the Reg 16 Submission Plan, all of which relate to biodiversity.

Objection 1

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

Footnote: I provide a comprehensive supporting report entitled "Wetheringsett cum Brockford Biodiversity Statement". In particular I refer to paras. 1.1, 1.4, 3.1, 3.2, 3.3, 3.4, 12.1, 12.2, 12.3 and 12.4 of the statement.

Objection 2

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].

Footnote: I provide a comprehensive supporting report entitled "Wetheringsett cum Brockford Biodiversity Statement". In particular I refer to paras. 1.1, 1.4, 3.1, 3.2, 3.3, 3.4, 12.1, 12.2, 12.3 and 12.4 of the statement.

Objection 3

The Submission Plan is not addressing the challenge of climate change and its implications for biodiversity and therefore the Plan 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. 4.3 relating to a quote from the NPPF.

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

I will forward this communication to other interested parties as I consider that the issues that I have raised may have much wider implications.

Kind regards

Mr Livall

MSDC Note: The Biodiversity Statement follows on the next page.

Wetheringsett cum Brockford Biodiversity Statement

1.	Introduction
1.1	<p>I have recently had the pleasure of viewing the Wetheringsett cum Brockford Neighbourhood Plan 2022-2037 Submission Draft December 2022 and supporting Environmental Assets Report. I can see that the community is taking positive steps to protect and enhance biodiversity although it would be clearly desirable to achieve stronger links with the climate emergency.</p> <p>In particular, I note Area Wide Objective 3: To protect the rural character, biodiversity, and open spaces of the parish.</p> <p>There are 4 environmental policies which sit under this objective:</p> <ul style="list-style-type: none"> - Policy WCB9: Landscape character and important views - Policy WCB10: Protecting and enhancing biodiversity - Policy WCB11: Local Green Spaces - Policy WCB12: Amenity and dark skies <p>In terms of biodiversity, Policy WCB10 is the most relevant.</p> <p>I also note the inclusion of</p> <p>Fig 20 – Ecological Networks in the parish Fig 21 – Local Green Spaces (<i>see also Appendix D</i>)</p> <p>I have also made reference to</p> <p>Appendix F – Parish Policies and Inset Maps:</p> <p>Parish Wide Policies Map Inset 1 – Brockford Street Inset 2 – Wetheringsett (Church) Inset 3 – Wetherup Street/Park Green</p> <p>I note that ecological networks and biodiversity resources are not identified on the Parish Wide Policies Map and Inset Maps.</p>
1.2	<p>The Neighbourhood Plan is supported by an Environmental Assets Report titled “Environmental Assets in Wetheringsett-cum-Brockford”.</p> <p>This covers a range of listings:</p>

	<ul style="list-style-type: none"> - <i>SSSI just outside of parish</i> - <i>County Wildlife Sites</i> - <i>Deciduous Woodland</i> - <i>Woodpasture & Parkland</i> - <i>Traditional Orchards</i> - <i>Ancient and historic trees</i> - <i>Lowland Meadows</i> - <i>Rivers</i> - <i>Protected Species</i> - <i>Built Environment and Associated Habitats</i> - <i>Ecological networks</i> <p>Another positive that I note is the use of Defra’s MAGIC mapping tool and I consider the Submission Plan is ahead of many Neighbourhood Plans in terms of assessing biodiversity.</p> <ul style="list-style-type: none"> - <i>Deciduous Woodland BAP Priority Habitat Map</i> - <i>Woodpasture & Parkland BAP Priority Habitat Map</i> - <i>Traditional Orchards BAP Priority Habitat Map</i> - <i>Corn Bunting Countryside Stewardship Target Area Map</i> - <i>National Habitat Network</i> <p>The Environmental Assets Report lacks details on Ancient Hedgerows, but I note that the Suffolk Hedgerow Survey carried out between 1998-2012 did not include records for Wetheringsett-cum-Brockford.</p> <p>The Report helpfully concludes with recommendations covering the “<i>protection of natural assets through planning</i>”.</p>
1.3	<p>I refer to the first part of Policy WCB10:</p> <p>“Development proposals will be expected to protect and enhance existing ecological networks, wildlife corridors and priority species. Proposals should retain existing habitats of biodiversity value within the parish such as ponds, hedgerows, trees (including veteran trees), traditional orchards, woodlands, wood pasture and parkland and any other semi natural habitats within the parish.”</p> <p>I also refer to criterion c):</p> <p>“the restoration and reparation of fragmented ecological networks to be targeted within the area highlighted in Figure 20.</p> <p>I also refer to the following supporting paragraph:</p> <p><i>“Policy WCB10 below has been developed taking all of this into account. It refers to ‘wildlife’ corridors which is a term used to refer to any linear feature in the landscape that can be used for the migration or dispersal of wildlife. Such corridors allow for the linking of habitats and reduce the isolation of populations. Linear features may vary and may also not be continuous however patches of natural habitat can benefit wildlife and occasionally the terms ‘steppingstones’ is used to refer to these. The role of wildlife corridors is assuming greater importance and opportunities should be taken to create these as a consequence of new development.”</i></p>

1.4	<p>In general, I consider that Wetheringsett-cum-Brockford Parish Council is to be applauded for their work producing a Neighbourhood Plan that gives high regard to biodiversity as well as preparing a supporting Environmental Assets Report. However, I consider that the most important part is missing as the Plan (<i>and supporting Assessment</i>) fails to join up the sites of biodiversity importance that have been identified by mapping the wildlife network (<i>with connecting wildlife corridors and steppingstones</i>). At the same time, while the Plan (<i>and supporting Assessment</i>) is listing biodiversity resources, I do not consider that the Plan is accurately assessing and promoting “<i>the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species</i>”. What is the condition of these habitats? What restoration should be undertaken? Where should new wildlife corridors be created? Where should new hedgerows be planted and how will they beneficially link into the ecological network? What protected and priority species are under threat or might be displaced?</p> <p>In this respect I make the case that Plan does not currently meet the criteria set down in Para. 179 of the National Planning Policy Framework 2021.</p>
2.	<h2>Duty to conserve biodiversity</h2>
2.1	<p>The Natural Environment and Rural Communities Act 2006 states that “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.” https://www.legislation.gov.uk/ukpga/2006/16/part/3/crossheading/biodiversity/2013-09-01?view=plain</p> <p><i>“All public bodies have a statutory duty to have regard to the conservation of biodiversity, as set out in the Natural Environment and Rural Communities (NERC) Act 2006. The Act also requires the publication of lists of living organisms and types of habitat which in the Secretary of State’s opinion are of principal importance for the purpose of conserving biodiversity. There are 262 priority species and 23 priority habitats in Suffolk.”</i> https://www.suffolk.gov.uk/asset-library/imported/suffolks-nature-strategy-2015.pdf</p> <p>The NERC Act requires all Local Authorities to be able to show that:</p> <ul style="list-style-type: none"> • Biodiversity and conservation are integrated throughout all policies and activities across the Council • All staff, managers and Councillors understand how biodiversity issues relate to their decisions and actions • All biodiversity, especially species and habitats of principal importance, are protected and enhanced • It provides sustained support to local biodiversity initiatives • It has access to up-to-date biodiversity information and professional ecological expertise • It reports on progress towards and demonstrates progress against, national and local biodiversity targets <p>https://southribble.gov.uk/media/1896/Biodiversity-Strategy-2022/pdf/Biodiversity_Strategy_v2_1.pdf?m=637945135425700000</p> <p>In general, I consider Wetheringsett-cum-Brockford Parish Council, as a public authority, is taking positive steps to meet its duties to conserve biodiversity under the Natural Environment and Rural Communities Act 2006. However, at the moment I can see no evidence that it is preparing habitat and wildlife corridor network maps and data on enhancements, restoration etc in accordance with the relevant sections of the NPPF.</p>
2.2	<p>The Lawton Report ‘Making Space for Nature’ (2010) gave principal recommendations for England as being to:</p>

- Improve the quality of current wildlife sites by better habitat management
- Increase the size of existing wildlife sites
- Enhance connections between sites, either through physical corridors or through 'steppingstones'
- Create new sites
- Reduce the pressure on wildlife by improving the wider environment

<https://naturalengland.blog.gov.uk/2020/09/16/making-space-for-nature-10-years-on/>
<https://www.stroud.gov.uk/media/241279/hardwicke-ndp-ecological-assessment.pdf>

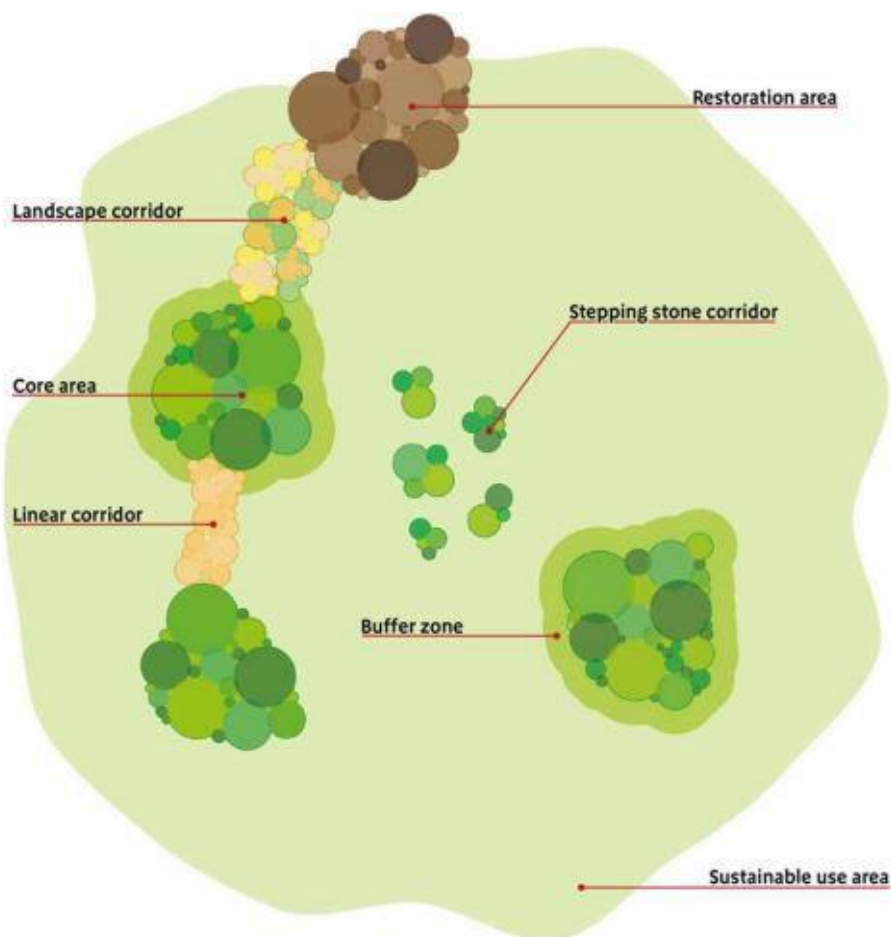


Figure 1. The components of ecological networks (Making Space for Nature report)

2.3 The principles of creating coherent ecological networks have been embedded within many planning and policy documents:

- The Natural Environment White Paper 'The Natural Choice' (2011)
<https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature>
- Biodiversity 2020 'Strategy for England's Wildlife and Ecosystem Services' (2011)
<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>
- National Planning Policy Framework (NPPF) (2012) (refer current 2021 version)
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_3_Biodiversity_Paper_3-1.pdf

3. National Planning Policy Framework 2021

3.1	<p>National Planning Policy Framework 2021 (pages 50-54) - 15. Conserving and enhancing the natural environment – states:</p> <p>Habitats and biodiversity</p> <p><i>Para 179. “To protect and enhance biodiversity and geodiversity, plans should:</i></p> <p><i>a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and steppingstones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and</i></p> <p><i>b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”</i></p> <p>https://www.gov.uk/government/publications/national-planning-policy-framework--2</p>
3.2	<p>Other sections of the NPPF are also of relevance, namely Paras 8, 28, 31, 174, 175 and 179. In particular, I highlight:</p> <p>“Preparing and reviewing plans</p> <p><i>Para. 31. “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.”</i></p> <p>I refer to the excellent summary by the Worcestershire Wildlife Trust using the link below.</p> <p>https://www.worcswildlifetrust.co.uk/sites/default/files/2021-08/Biodiversity%20in%20the%20NPPF%20update%202021.pdf.</p>
3.3	<p>From the above we can elicit that Neighbourhood plans are required to identify, map and safeguard components of local wildlife rich habitats and wider ecological networks including locally designated sites of importance for biodiversity, wildlife corridors and steppingstones that connect them. To meet this requirement, it is obviously necessary to provide details of the local habitats and networks backed up by survey evidence.</p>
3.4	<p>Neighbourhood Planning Guidance does not refer to biodiversity but highlights that <i>“the National Planning Policy Framework is the main document setting out the government’s planning policies for England and how these are expected to be applied.”</i></p> <p>https://www.gov.uk/guidance/neighbourhood-planning--2#evidence-to-support-a-neighbourhood-plan</p> <p>The Guidance does cross-reference to Plan-making Guidance (published 13 September 2018).</p> <p>https://www.gov.uk/guidance/plan-making</p> <p>I quote the following key paragraph from this guidance:</p> <p><i>What evidence might be needed to plan for the natural environment and biodiversity?</i></p> <p><i>All planning policies and decisions need to be based on up-to date information about the natural environment and other characteristics of the area including drawing, for example, from River Basin Management Plans, Areas of Outstanding Natural Beauty Management Plans, Green Infrastructure</i></p>

	<i>Plans (including environmental net gain and Nature Recovery Networks), Tree and Woodland Strategies, and landscape character assessments. Working with Local Nature Partnerships and other public bodies where appropriate, this should include an assessment of existing and potential components of ecological networks, biodiversity resources and landscapes."</i>
4.	Ensuring that wildlife and the environment are protected and enhanced within your Neighbourhood Plan
4.1	Suffolk's Nature Strategy 2015 states <i>"Suffolk's Biodiversity Action Plan (BAP), which comprises our list of priority species and habitats, is [should be] embedded in local planning policies. Impacts on legally protected species are a material consideration in the planning process whilst impacts on priority species and habitats are also capable of being material considerations. The National Planning Policy Framework (NPPF) includes a range of requirements to conserve and enhance the natural environment as well as requiring local plans to promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations."</i> https://www.suffolk.gov.uk/asset-library/imported/suffolks-nature-strategy-2015.pdf
4.2	The Strategy goes on to state that <i>"By [2018], all Neighbourhood Development Plans and Parish Plans should ensure the natural environment is fully considered. They should maximise opportunities to conserve, enhance and link Suffolk's green and natural spaces."</i> https://www.suffolk.gov.uk/asset-library/imported/suffolks-nature-strategy-2015.pdf
4.3	<p>The Suffolk Wildlife Trust establish that Neighbourhood Plans should:</p> <ul style="list-style-type: none"> • Highlight what wildlife and the environment means to people in your parish • Map the biodiversity assets of your parish such as greenspace, hedgerows, ponds and the presence of certain species • Protect and enhance existing green space in your parish for wildlife, such as parks, nature reserves and County Wildlife Sites • Ensure that space for nature is integral to new development in your parish with wildlife friendly landscaping, Sustainable Drainage Systems (SuDS) and green space • Identify where green corridors could be created to link existing green space for people and wildlife and add to the Nature Recovery Network • Target Biodiversity Net Gain from development to key biodiversity assets and species within your parish • Help improve health and wellbeing in your parish through improved access to nature and greenspace • Help improve the resilience of your community to climate change" <p>https://www.suffolkwildlifetrust.org/wilder-planning</p>
4.4	The Suffolk Wildlife Trust have also put forward the following measures:

	<p><i>"1. Evidence – Get information about the habitats and species in your parish, by requesting the records for your parish from Suffolk Biodiversity Information Service. Ensure you request information on where the County Wildlife Sites are in your parish and why they are designated as regionally important. To find information on Priority habitats, land in conservation management (i.e., Agri-environment schemes) and designated sites in your parish, such as Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), go to the Natural England mapping tool MAGIC maps.</i></p> <p><i>2. Survey your local area – Some areas of the county will have limited records of species and habitats, but local people can add to this knowledge. Encourage local people to get out surveying species and identifying key habitats for wildlife across your parish.</i></p> <p><i>3. Map the Biodiversity Assets of your parish – Map all the known habitats (e.g., ponds, woodlands, hedgerows, grasslands, heathlands, wetlands, rivers), land in conservation management, local green space and designated sites including County Wildlife Sites, Roadside Nature Reserves, SSSIs, SACs and SPAs. Look at where the core areas for wildlife are in your parish, for example where there is a grouping of important habitats or a corridor where wildlife habitats are linked such as along a river corridor.</i></p> <p><i>4. Map the Green Corridors in your parish – Your Biodiversity Assets map will show you where the habitats are that need protecting in your parish. You can also consider where existing biodiversity assets could be enhanced by improving management for wildlife, buffered by creating new habitats between designated habitats and new development or agriculture, or linked by adding hedgerows, scrub or unmown grass margins between existing habitats. This will all form the basis of a Green Corridors map of your parish. Make sure to consider how habitats in neighbouring parishes link into habitats in your parish. If you don't know where to start take a look at the National Habitat Network Maps in MAGIC maps to see where habitat creation would be best targeted in your parish.</i></p> <p><i>5. Add these maps to your Neighbourhood Plan – point developers to them, so that any habitat creation or enhancement required for Biodiversity Net Gain in your parish is targeted to where you want it and where it will provide the greatest benefits for wildlife. Encourage development in your parish to improve Green Corridors for people and wildlife.</i></p> <p><i>6. Highlight the key species in your parish so that developers can focus enhancement for wildlife on these species– for example, if you have great populations of swifts and hazel dormouse in your parish you will want developments to include swift boxes and native hedgerow and scrub planting which improves links for hazel dormouse across the parish.</i></p> <p><i>7. Require wildlife friendly lighting for all development.</i></p> <p><i>8. Include an ambition for 20% Biodiversity Net Gain in your parish.</i></p> <p><i>9. Highlight the health and wellbeing benefits of improved access to nature for local people."</i> https://www.suffolkwildlifetrust.org/wilder-planning </p>
4.5	<p>The Suffolk Wildlife Trust share my desire to see Neighbourhood Plans across Suffolk embed policies and measures to increase and connect locally important wildlife habitats as part of wider efforts to reverse wildlife loss. The SWT would support and encourage efforts by parish councils and local people to identify areas where wildlife habitats could be created and enhanced to provide wildlife corridors and increase biodiversity. Their Wilder Ecology ecological consultancy carried out a Landscape and Biodiversity Evaluation for Wherstead Parish Council as part of the development of the NP. This identified the parish's priority habitats and species, connectivity between wildlife habitats.</p>

	<p>https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Wherstead-NP-Landscape-Wildlife-Evaluation.pdf</p> <p>The SWT are able to explain to communities how their Neighbourhood Plan can do more to incorporate aspirations and opportunities for increasing and enhancing biodiversity in the parish.</p> <p>https://www.suffolkwildlifetrust.org/contact</p>
5.	Ecological Networks
5.1	The local natural environment contains a number of disconnected places: gardens, parks, playing fields, farmland, woodland, grassland and wetlands. It should be considered not just as isolated spots of green but a potentially thriving network linking wildlife sites across these environments. Important habitat can also be found in neighbouring parishes and on undisturbed road verges.
5.2	Neighbourhood Planning provides an important opportunity for communities to shape their local environment for future generations. Through identifying and evaluating opportunities and constraints, local communities can take an informed position and become better able to protect their valuable natural assets.
5.3	<p>England's wildlife habitats have become increasingly fragmented and isolated, leading to declines in the provision of some ecosystem services, and losses to species populations. Ecological networks have become widely recognised as an effective way to conserve wildlife in environments that have become fragmented by human activities. Ecological networks generally have five components which reflect both existing and potential ecological importance and function:</p> <ul style="list-style-type: none"> • Core areas • Corridors and steppingstones • Restoration areas • Buffer zones • Sustainable use areas <p>https://www.gov.uk/government/publications/nature-improvement-areas-improved-ecological-networks/nature-improvement-areas-about-the-programme</p> <p>http://www.willaston-np.org.uk/files/Protecting_and_Enhancing_Willaston_Natural_Environment.pdf</p>
	<i>Habitat Connectivity</i>
5.4	The National Planning Policy Framework recognises the need for, and the implementation of landscape habitat connectivity. However, the NPPF does not specify how this should be done.
5.5	<p>The main habitat groups identified for the connectivity mapping include:</p> <ul style="list-style-type: none"> • Woodlands; including semi-natural, broad-leaved plantation and scrub land • Priority grasslands; namely all grasslands that have not been agriculturally improved • Standing water and habitats associated with marshy conditions, ponds and marsh • Intact hedgerows and trees

5.6	<p>Connectivity mapping shows where there are opportunities for improving connections between similar types of habitats. Conversely the mapping can be used to assess the possible impact of development on existing habitats and where these can be offset or avoided altogether.</p> <p>https://www.alcester-tc.gov.uk/wp-content/uploads/2018/10/Alcester-Ecological-Report-Aug-2018.pdf</p>
6.	Habitat datasets assessed (mapping as appropriate)
6.1	<p>These can include:</p> <ul style="list-style-type: none"> • Sites of Special Scientific Interest (SSSI) • Special Areas of Conservation (SAC) • Special Protection Areas (SPAs) • National Nature Reserves (NNRs) • County Wildlife Sites (Designated non-statutory sites) • Other Sites of Wildlife Interest • Unconfirmed Wildlife Sites • Potential Wildlife Sites • Local Nature Reserves • Ancient Woodland Inventory • Ancient Hedgerows and Species-Rich Hedgerows • Commons and Access Land • Land within Agri-environment schemes • Traditional Orchards (PTES Orchard Survey) • Veteran Trees • Protected Wildflower Verges • Important Bird Areas • Invertebrate Site Register Locations • Google Earth - such as unrecorded Semi-Natural Habitats <p> https://www.suffolkbis.org.uk/ https://magic.defra.gov.uk/magicmap.aspx https://www.acraew.org.uk/commissioners-decisions/suffolk https://www.dbric.org.uk/neighbourhood-plans/ https://almeleypc.org/wp-content/uploads/2018/07/Almeley-Parish-Council-Nature-Conservation-Plan-June-2018.pdf </p>
7.	Priority Habitats (mapping as appropriate)
7.1	<p>These can include:</p> <ul style="list-style-type: none"> • Ancient Woodland • Arable field margins • Hedgerows • Lowland calcareous grasslands • Lowland meadows • Lowland mixed deciduous woodlands • Ponds • Rivers and streams

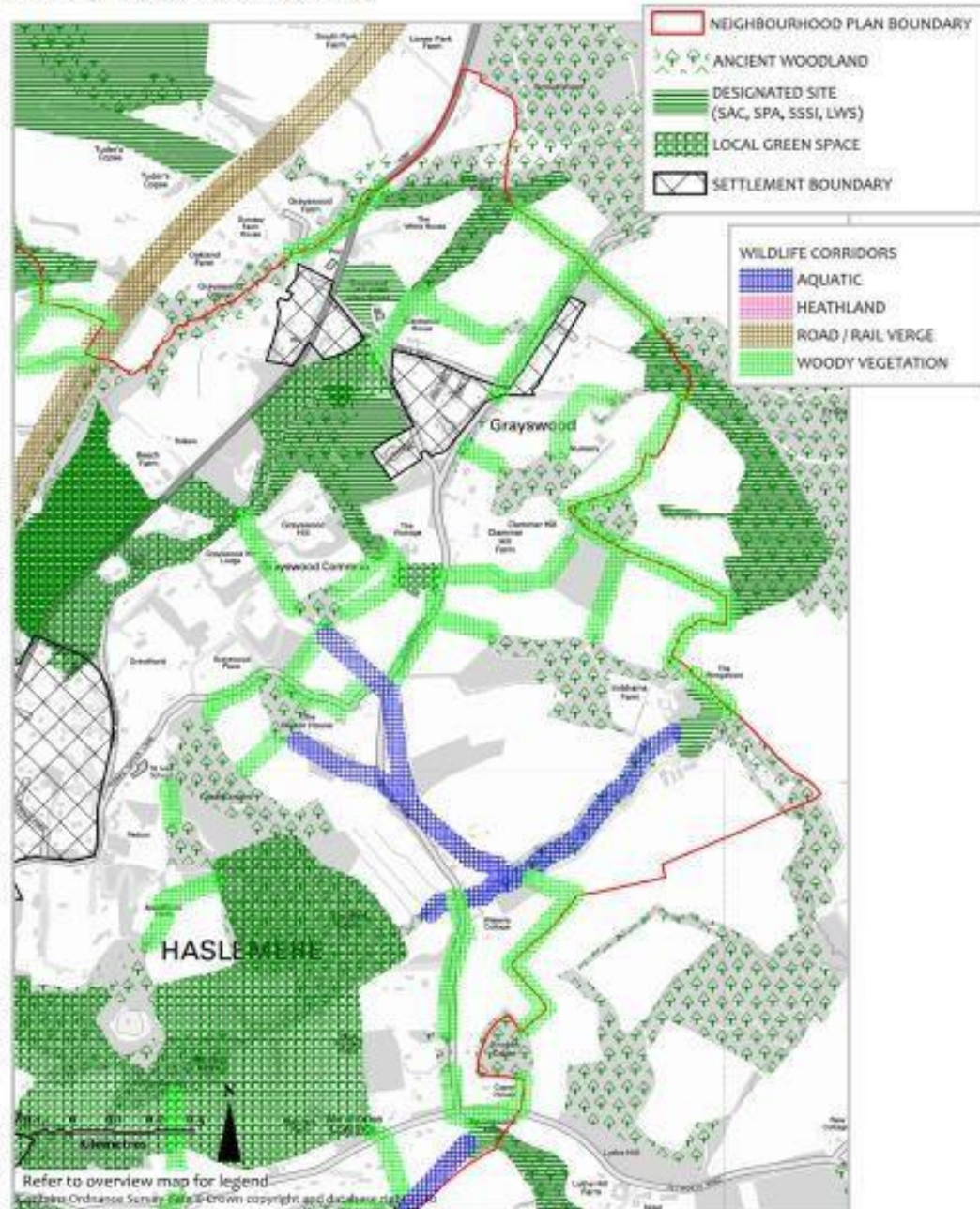
	<ul style="list-style-type: none"> • Traditional orchards • Wood pastures and parklands <p><i>Wider Countryside</i></p> <ul style="list-style-type: none"> • Farmland • Improved grassland • Road verges (important for providing linkage between habitats) • Riverbanks (provide important links between habitats) <p><i>Built Environment - Towns and Villages</i></p> <ul style="list-style-type: none"> • Gardens and Allotments • Parks, Recreation Sites and playing fields • Churches and Churchyards <p>https://www.suffolkbis.org.uk/habitat</p>
8.	Protected and Notable Species
8.1	<p>Species of Principle Importance (Section 41 NERC Act 2006) – the most important species for the purpose of conserving biodiversity.</p> <p>Suffolk Priority Species</p> <p>https://www.suffolkbis.org.uk/species</p>
9.	Key Priorities
9.1	<p>Priorities and actions to protect and enhance biodiversity include:</p> <ul style="list-style-type: none"> • Designated sites, protected species and ancient or species-rich hedgerows, grasslands, woodlands, traditional orchards and watercourses will be protected. • Ecological networks, and the migration of flora and fauna, through creating and protecting buffer zones around important wildlife rich sites will be protected and preserved. • Ancient trees or trees of arboricultural value will be retained and protected • The mitigation, preservation, restoration and recreation of wildlife habitats, and the protection and recovery of priority species will be promoted • Providing a net gain in flora and fauna, particularly in the areas defined on the Natural Assets Map (using the DEFRA biodiversity metric.) <p>https://almeleypc.org/wp-content/uploads/2018/07/Almeley-Parish-Council-Nature-Conservation-Plan-June-2018.pdf</p> <p>https://www.gov.uk/guidance/biodiversity-metric-calculate-the-biodiversity-net-gain-of-a-project-or-development</p>
9.2	<p>More detailed priorities and actions:</p> <ul style="list-style-type: none"> • Undertake a phase one survey of the whole neighbourhood plan area, including hedgerows and ponds. Ensure all results are submitted to the Suffolk Biodiversity Information Service. • Identify habitats that require further / more detailed survey. Ensure all results are submitted to the Suffolk Biodiversity Information Service. • Undertake more comprehensive recording of species within the neighbourhood plan area.

	<p>Promote the online recording system iRecord within the local community to encourage awareness of the local area's biodiversity and support the incidental recording of wildlife.</p> <ul style="list-style-type: none"> • Following on from previous survey work identify the need for any ongoing monitoring programmes. <p>https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_3_Biodiversity_Paper_3-1.pdf</p>
9.3	<ul style="list-style-type: none"> • Creation of more connection between woodlands using hedgerows and shaws. This could include improved management of existing hedgerows as well as creation of new hedgerows. • Creation and restoration of more ponds, seasonal standing water such as wader scrapes, and wetland habitats. • Creation of community orchards with access to nature around urban areas for local people • Work with Buglife to enhance pollinator and unimproved grassland networks <p>https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_3_Biodiversity_Paper_3-1.pdf</p>
9.4	<ul style="list-style-type: none"> • Improve the quality of the 'wildlife corridor network' and assess against Local Wildlife Site selection criteria. • Protect, enhance and connect areas of high/medium value which lie outside the wildlife corridor. <p>http://www.willaston-np.org.uk/files/Protecting_and_Enhancing_Willaston_Natural_Environment.pdf</p>
9.5	<p>Further possible actions:</p> <ul style="list-style-type: none"> • Improve the management of gardens so that they are more sympathetic to wildlife. • Improve the value of open spaces for wildlife and to establish wildlife corridors. • Manage trees to support wildlife, control pollution, moderate temperatures and provide shelter. • Maintain and enhance the churchyard to support local flora and fauna. • Improve the value of the countryside for wildlife. • Increase wetland biodiversity. • Improve the wildlife habitat and floral diversity alongside roads. • Improve cover for nesting birds and maintain a network for wildlife between sites. • Preserve the natural ancient woodland habitat. • Enhance species rich priority habitats, to improve their status for wildlife and support the ecological network. • Improve residents' knowledge of local wildlife. • Promote biodiversity and its conservation to the public, landowners, land managers and decision makers. <p>http://www.horndeanbiodiversity.co.uk/files/Horndean%20Biodiversity%20Action%20Plan.pdf</p>
10.	Mapping Biodiversity in your Local Area
10.1	<ol style="list-style-type: none"> 1. Map the existing known habitats and designated sites in your parish or Neighbourhood Plan area. [Refer https://www.suffolkbis.org.uk/] 2. Add local knowledge to the map through local species recording groups and organised surveys. 3. Identify clusters of habitats and sites which form core areas i.e. areas where there are a few designated sites grouped together with other key wildlife habitats such as BAP priority habitats, ancient woodland or land in positive conservation management such as through agri-environment schemes. 4. Identify where links can be formed between core areas. This will also be partly subjective and partly objective depending on the detail of the maps. 5. The links between blocks of habitat within core areas and between core areas may be direct physical links (corridors) but might also be steppingstone blocks of habitat. Many species are able to cross gaps between blocks of suitable habitat, but their ability to do so depends on the distance involved, the type of land-use between the habitat blocks and the characteristics of the species concerned.

	https://sussexwildlifetrust.org.uk/discover/planning/strategic-planning/neighbourhood-plans/how-to-include-wildlife-in-neighbourhood-plans/mapping-biodiversity-in-your-local-area
10.2	<p>Suffolk Ecological Networks Project Mapping Methodology</p> <p>https://www.suffolkbis.org.uk/sites/default/files/2022-05/Ecological%20Networks%20Methodology%202007_0.pdf</p>
10.3	<p>A number of different forms of Biodiversity Maps can be viewed within Neighbourhood Plan documentation and Parish Biodiversity Action Plans. Examples include:</p> <ul style="list-style-type: none"> • Designated Areas of Conservation Interest • Areas of Habitat Important to Wildlife • Landcover Habitat Types • Principal Hedgerow Structure • Observed Wildlife Corridors <p>https://mylorflushingplan.uk/wp-content/uploads/2020/07/EB05-Wildlife-as-pdf.pdf</p> <ul style="list-style-type: none"> • Habitats of Principal Importance [<i>Priority habitat – Natural England 2014</i>] • Land Cover Habitats [<i>Land Cover Map 2007</i>] • Agricultural Land Classification [<i>Agricultural land grading</i>] • Designated Sites [<i>Protected sites for nature conservation, including international, European, national and local sites</i>] • Habitat Distinctiveness • Indicative Wildlife Corridors <p>http://www.willaston-np.org.uk/files/Protecting_and_Enhancing_Willaston_Natural_Environment.pdf</p> <ul style="list-style-type: none"> • Green Infrastructure Biodiversity Network Map • Ecological Networks and Habitat Opportunity Maps <p>https://www.northamptonshire.gov.uk/councilservices/environment-and-planning/planning/planning-policy/archaeology-biodiversity-and-landscape/documents/PDF%20Documents/Northamptonshire%20BAP%202015-2020.pdf</p> <ul style="list-style-type: none"> • Indicative Green Corridors <p>https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Oulton/Oulton-Neighbourhood-Plan-Referendum-Version.pdf</p> <ul style="list-style-type: none"> • Landscape & Wildlife Evaluation Report <p>https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Wherstead-NP-Landscape-Wildlife-Evaluation.pdf</p> <ul style="list-style-type: none"> • Statutory & non-statutory designated wildlife sites and Biodiversity Opportunity Areas • Overview map of wildlife corridors connecting designated wildlife sites • Opportunities / Additional information / Potential Partners schedule <p>https://www.waverley.gov.uk/Portals/0/Documents/services/planning-and-building/planning-strategies-and-policies/neighbourhood-planning/Haslemere%20Neighbourhood%20Plan%20Final.pdf?ver=rWc_AN6QsFOcgezGeVdQ%3d%3d</p>

Map 6 (Grayswood and Haslemere North East)

An extensive network of hedgerow corridors link to ancient woodland (including Grayswood Common, Imbhams and Frillinghurst Wood SNCIs) outside of the settlement boundaries. These corridors are important for dormice (from Grayswood to Imbhams) and bats (Grayswood to Swan Barn and Swan Barn to Imbhams). These corridors are perhaps the most important in Haslemere for bats, supporting a high number of bat species, including several rare bats and include a riparian corridor between Swan Barn and Imbhams, a headwater to the River Arun.



	<p>Excellent extract above from the Haslemere Neighbourhood Plan Final Appendices. In total Appendix 3 has nine Wildlife Corridor Maps.</p> <ul style="list-style-type: none"> • Wildlife corridor maps and descriptions https://www.waverley.gov.uk/Portals/0/Documents/services/planning-and-building/planning-strategies-and-policies/neighbourhood-planning/Haslemere%20Neighbourhood%20Plan%20Final%20%20Appendices%201%20-%203.pdf?ver=Ed5XMjSW84fJVxzB3uoe5w%3d%3d <p>Work in progress:</p> <ul style="list-style-type: none"> • Wildlife Network Map https://www.babergh.gov.uk/environment/climate-change/babergh-pledges-to-protect-wildlife/ <p>I attach an Appendix with many data sources, a number of which include examples of Biodiversity Mapping.</p>
11.	Other Biodiversity Possibilities
11.1	<p>There appear to be a range of other important Biodiversity Concepts and Initiatives that Parish Councils can address:</p> <ul style="list-style-type: none"> • Biodiversity or Geodiversity Assessment https://www.midsuffolk.gov.uk/assets/DM-Planning-Uploads/Validation-and-additional-guidance/Suffolk-Biodiversity-Validation-Requirements.pdf • Biodiversity Net Gain https://bucks.mknep.co.uk/biodiversity-net-gain/ https://beta.bathnes.gov.uk/biodiversity-net-gain https://www.lewes-eastbourne.gov.uk/_resources/assets/inline/full/0/314723.pdf • Green Infrastructure <i>Green Infrastructure (GI) provides a framework to guide and prioritise habitat restoration and creation. One of the main principles behind the GI framework is to provide a network of greenspace from high-use amenity land through to wilderness areas. It also seeks to link up areas of high biodiversity value into a continuous functioning network.</i> https://www.northamptonshire.gov.uk/councilservices/environment-and-planning/planning/planning-policy/archaeology-biodiversity-and-landscape/documents/PDF%20Documents/Northamptonshire%20BAP%202015-2020.pdf https://www.cravendc.gov.uk/planning/spatial-planning/spds-and-information/green-infrastructure-and-biodiversity/green-infrastructure-and-biodiversity-spd/ • Green-Blue Infrastructure https://www.surreycc.gov.uk/community/climate-change/what-are-we-doing/green-and-blue-infrastructure • Habitat and Species Action Plans https://www.norfolkbiodiversity.org/habitats-and-species/ • Local Nature Recovery Strategy

	<p>https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network https://bucks.mknep.co.uk/nature-strategy/overview/</p> <ul style="list-style-type: none"> • Meeting the Challenge of Climate Change https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change • Nature Improvement Areas (perhaps scope at a parish level) https://www.gov.uk/government/publications/nature-improvement-areas-improved-ecological-networks/nature-improvement-areas-about-the-programme • Rewilding https://www.rewildingbritain.org.uk/blog/25-year-environment-plan-is-this-a-turning-point-for-rewilding
12.	Good Practice - Parish & Town Biodiversity Action Plans
	<i>Local action to improve biodiversity</i>
12.1	A compelling case can be made that every Parish should be taking local action to improve biodiversity in their administrative area. The Wetheringsett cum Brockford Neighbourhood Plan 2022-2037 Submission Draft December 2022, with particular reference to Policy WCB10: Protecting and enhancing biodiversity , in my view provides a strong biodiversity policy context. My main concern is that while Submission Plan refers to “existing ecological networks (and) wildlife corridors” in Policy WCB10 supported by Para. 7.23, it does not map or identify the corridors in either the Submission Plan or the supporting Environmental Assets Report. I also note that ecological networks and biodiversity resources are not identified on the Parish Wide Policies Map and Inset Maps.
12.2	Fig 20 Ecological Networks in the parish represents a somewhat “broad-brush extract” of Defra’s MAGIC Map. It defines the Habitat Network Enhancement Zone One by Natural England and includes the Deciduous Woodland BAP Priority Habitat. However, other elements such as Woodpasture & Parkland BAP Priority Habitat are missing from Fig. 20 and most importantly no details are provided of the connectivity of the ecological network. At the same time Fig 20 only covers land in the centre of the village.
12.3	The Submission Plan also gives no indication of the state and condition of the parish’s biodiversity and habitats and the connectivity of its wider ecological networks. Nationally, biodiversity sadly appears to be in decline. Is this position being repeated in Wetheringsett cum Brockford? What is the community proposing to do about it in terms of possible actions? These critical questions are not addressed in the Submission Plan. Similarly, the Plan is not accurately assessing and promoting “the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species”. It therefore does not accord with Para. 179 of the National Planning Policy Framework.
12.4	Wetheringsett cum Brockford Parish Council, having prepared an Environmental Assets Report, in my view have clearly taken steps to help meet its duties to conserve biodiversity under the Natural Environment and Rural Communities Act 2006 and respond to some of the requirements laid down in the National Planning Policy Framework. However, I do consider that further work should be undertaken to expand the Assets Report to address some of the deficiencies highlighted above, and to complete a more comprehensive Parish Biodiversity Action Plan / Ecological Assessment.

12.5	<p>In another part of the country, South Gloucestershire Council (SGC) have undertaken sterling work in developing Local Biodiversity Action Plans. The Local Authority has recognised that wildlife needs protecting, and habitats need managing at a parish level. SGC state that “local communities can provide vital help by valuing, conserving and enhancing biodiversity in their local area. Deciding where to start can be a daunting prospect, so South Gloucestershire Council has developed a BAP for each parish and/or town, which outlines how you can help ... wildlife at a local community level. The Parish and Town BAP’s can help with efforts to secure a better local environment and contribute to the wider BAP for [the District]”.</p> <p>https://www.southglos.gov.uk//documents/Biodiversity-Action-Plan-2016-26.pdf https://www.southglos.gov.uk/environment-and-planning/countryside/wildlife/what-is-biodiversity/ https://beta.southglos.gov.uk/wp-content/uploads/Local-Nature-Action-Plans-guidance-for-town-and-parish-councils.pdf</p>
12.6	<p>Each BAP [<i>can</i>] suggest some projects under the biodiversity action section that help to:</p> <ul style="list-style-type: none"> • Improve the quality of existing habitats. • Create new habitat. • Link habitats. • Take part in landscape-scale conservation. • Engage people with nature.
12.7	<p>Examples of the abbreviated Parish BAPS produced by South Gloucestershire Council are provided below:</p> <p>Hawkesbury Parish BAP https://www.southglos.gov.uk//documents/Hawkesbury-BAP.pdf</p> <p>Westerleigh Parish BAP https://www.southglos.gov.uk//documents/Westerleigh-BAP.pdf</p>
12.8	<p>Further work by the community can then result in the delivery of a more detailed Local Nature Action Plan</p> <p>https://www.westerleighparishcouncil.org.uk/wp-content/uploads/2020/05/Westerleigh-and-Coalpit-Heath-LNAP-2022-25-Final.pdf</p>
12.9	<p>I make the case that an abbreviated Parish BAP following the South Gloucestershire Council model can be produced very quickly and would not represent an onerous task. However, Wetheringsett cum Brockford Parish Council should consider the development of a more comprehensive Parish BAP / Ecological Assessment which can provide a useful resource at a planning appeal. Such an Assessment will also meet the criteria set down in Para. 179 of the National Planning Policy Framework 2021.</p>
12.10	<p>Nationally, there are some other good examples of Local Biodiversity Action Plans / Ecological Assessments and work that has been undertaken in supporting the preparation of Neighbourhood Development Plans. These can be viewed in the attached Appendix – Biodiversity References below.</p>
	<p>Richard Livall 5th February 2023</p>

Biodiversity is the whole variety of life on Earth, all species of plants and animals, their genetic variation and the habitats and ecosystems they are part of. It includes not just the rare or the threatened but also the wildlife that is familiar to us in the places where we live and work. Biodiversity is important for its own sake, along with the many benefits we derive from the natural environment – products like food, fibre, wood, and water; services like pollination, nutrient cycling, soil formation, water purification, flood defence and opportunities for reflection and recreation – all are critical for our wellbeing and survival.

Biodiversity Audit

Designated sites for nature conservation

Nationally important wildlife sites (i.e Site of Special Scientific Interest (SSSI), Local Nature Reserve): None

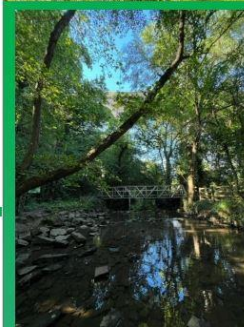
- Cuckoo Lane/ A432, Wick Wick road verge, neutral grassland
- Fields south of Rockwell Wood
- Hotwater Brake
- Blackberry Brake
- Branch pool wood, Henfield



South Gloucestershire
Council



2022 - 2025



WESTERN MICHIGAN UNIVERSITY

Appendix - Biodiversity References

A: Parish Biodiversity Action Plan / Nature Conservation Strategy

Hawkesbury Parish Biodiversity Action Plan

<https://www.southglos.gov.uk//documents/Hawkesbury-BAP.pdf>

Westerleigh Parish Biodiversity Action Plan

<https://www.southglos.gov.uk//documents/Westerleigh-BAP.pdf>

Westerleigh and Coalpit Heath Local Nature Action Plan

<https://www.westerleighparishcouncil.org.uk/wp-content/uploads/2020/05/Westerleigh-and-Coalpit-Heath-LNAP-2022-25-Final.pdf>

Almeley Parish Biodiversity Plan

<https://almeleypc.org/wp-content/uploads/2018/07/Almeley-Parish-Council-Nature-Conservation-Plan-June-2018.pdf>

Hamble Parish Biodiversity Action Plan

<https://hambleparishcouncil.gov.uk/wp-content/uploads/2021/11/Biodiversity-Action-Plan.pdf>

Hornbeam Parish Biodiversity Action Plan

<http://www.horndeanbiodiversity.co.uk/files/Horndean%20Biodiversity%20Action%20Plan.pdf>

Hornbeam Biodiversity

<http://www.horndeanbiodiversity.co.uk/>

Overton Parish Biodiversity Action Plan

<https://www.overton-biodiversity.org/resources/docs/overton-bap-2015-19.pdf>

B: Neighbourhood Plans (with Wildlife Content)

Hellingly Neighbourhood Plan

<https://www.wealden.gov.uk/UploadedFiles/01-Hellingly-Neighbourhood-Plan.pdf>

Hellingly Topic Paper 8 - Wildlife Hubs and Natural Capital

https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_8_Biodiversity_Paper_1.pdf

Hellingly Topic Paper 8 - Desktop Biodiversity Report

https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_8_Biodiversity_Paper_2.pdf

Hellingly Topic Paper 8 - Nature Conservation and Biodiversity

https://www.wealden.gov.uk/UploadedFiles/Hellingly_Topic_Paper_3_Biodiversity_Paper_3-1.pdf

Alcester Neighbourhood Plan

<https://www.stratford.gov.uk/planning-building/alcester-neighbourhood-plan.cfm>

Alcester Ecological Report

<https://www.alcester-tc.gov.uk/wp-content/uploads/2018/10/Alcester-Ecological-Report-Aug-2018.pdf>

Badgers Mount Neighbourhood Plan (under preparation)

https://www.badgersmountparishcouncil.org.uk/page-neighbourhood_plan.html

Badgers Mount Parish Council Ecological Appraisal

https://www.badgersmountparishcouncil.org.uk/imgs/final_habitat_report70.pdf

Barnham and Eastergate Neighbourhood Plan

<https://barnhamandeastergate-pc.gov.uk/the-parish-council/neighbourhood-plan-2019-to-2031/>

Barnham and Eastergate Neighbourhood Plan Appendix A Biodiversity Corridors

<https://www.arun.gov.uk/download.cfm?doc=docm93ijm4n17417.pdf&ver=18059>

Brailsford Neighbourhood Plan

https://www.derbyshiredales.gov.uk/images/Brailsford_NP_Made_Version_July_2021.pdf

Brailsford Neighbourhood Plan - Local Landscape and Wildlife

But no supporting document

Brinkley Neighbourhood Plan

<https://brinklowvillage.co.uk/wp-content/uploads/2022/11/Draft-Brinklow-Neighbourhood-Plan-Made-Version-November-2022-18.11.22.pdf>

Brinkley Neighbourhood Plan Parish Biodiversity Audit

<https://brinklowvillage.co.uk/wp-content/uploads/2018/03/Binklow-Parish-Ecological-Report.pdf>

Hackleton Neighbourhood Plan

<https://www.southnorthants.gov.uk/info/47/neighbourhood-plans/284/hackleton-neighbourhood-plan>

Hackleton Parish Council Wildlife and Biodiversity Policy

<https://www.hackletonparishcouncil.gov.uk/uploads/wildlife-and-biodiversity-policy.pdf>

Hardwicke Neighbourhood Plan

<https://www.hardwickepc.gov.uk/documents/170706-185620-216-HardwickeNDPFinalDocumentJuly2017pdf.pdf>

Hardwicke Neighbourhood Plan Ecological Assessment

<https://www.stroud.gov.uk/media/241279/hardwicke-ndp-ecological-assessment.pdf>

Haslemere Neighbourhood Plan

https://www.waverley.gov.uk/Portals/0/Documents/services/planning-and-building/planning-strategies-and-policies/neighbourhood-planning/Haslemere%20Neighbourhood%20Plan%20Final.pdf?ver=rWc_AN6QsSFOcqezfGeVdQ%3d%3d

Haslemere Neighbourhood Plan Final Appendices

<https://www.waverley.gov.uk/Portals/0/Documents/services/planning-and-building/planning-strategies-and-policies/neighbourhood->

	<p>planning/Haslemere%20Neighbourhood%20Plan%20Final%20%20Appendices%201%20-%203.pdf?ver=Ed5XMjSW84fJVxB3uoe5w%3d%3d</p> <p>Martock Neighbourhood Plan http://www.martockplan.org.uk/Drafts/Downloads/FinalVersion.pdf</p> <p>Martock Environmental Manual http://martockplan.org.uk/Documents/Supportingdocs/EnvManual.pdf</p> <p>Mylor Neighbourhood Plan https://mylorflushingplan.uk/wp-content/uploads/2021/06/MYLOR-NDP-Main-document-Submission-Draft-MB-180521.pdf</p> <p>Oulton Neighbourhood Plan https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Oulton/Oulton-Neighbourhood-Plan-Referendum-Version.pdf</p> <p>Oulton Neighbourhood Plan - Biodiversity and Green Corridors But no supporting document.</p> <p>Wherstead Neighbourhood Plan https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Wherstead-NP-Sub-Draft-Oct22.pdf</p> <p>Wherstead Neighbourhood Plan Landscape & Wildlife Evaluation Report https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Wherstead-NP-Landscape-Wildlife-Evaluation.pdf</p> <p>Mylor Neighbourhood Plan Parish Wildlife Assessment https://mylorflushingplan.uk/wp-content/uploads/2020/07/EB05-Wildlife-as-pdf.pdf</p> <p>Willaston Neighbourhood Plan https://www.cheshireeast.gov.uk/pdf/planning/neighbourhood-plan/willaston/willaston-neighbourhood-plan-18.05.18.pdf</p> <p>Willaston Neighbourhood Plan - Protecting and Enhancing Willaston's Natural Environment http://www.willaston-np.org.uk/files/Protecting_and_Enhancing_Willaston_Natural_Environment.pdf</p> <p>Worlingham Neighbourhood Plan https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Worlingham/Worlingham-Neighbourhood-Plan-Referendum-Version.pdf</p> <p>Worlingham Neighbourhood Plan - Biodiversity and Wildlife Corridors But no supporting document.</p>
C:	County Biodiversity Action Plan / Nature Conservation Strategy
	<p>Suffolk's Nature Strategy 2015 https://www.suffolk.gov.uk/asset-library/imported/suffolks-nature-strategy-2015.pdf</p> <p>Bucks Local Nature Recovery Strategy https://bucks.mknep.co.uk/nature-strategy/overview/</p>

	https://bucksmknep.co.uk/biodiversity-net-gain/ Northamptonshire Biodiversity Action Plan https://www.northamptonshire.gov.uk/councilservices/environment-and-planning/planning/planning-policy/archaeology-biodiversity-and-landscape/documents/PDF%20Documents/Northamptonshire%20BAP%202015-2020.pdf
D:	District Biodiversity Action Plan / Nature Conservation Strategy
	South Gloucestershire Biodiversity Action Plan https://www.southglos.gov.uk//documents/Biodiversity-Action-Plan-2016-26.pdf Babergh Biodiversity Action Plan https://baberghmidsuffolk.moderngov.co.uk/documents/s20689/Appendix%20A%20-%20Biodiversity%20Action%20Plan.pdf
E:	County & District Biodiversity Guides
	Suffolk County Council Neighbourhood Planning Guidance https://www.suffolk.gov.uk/asset-library/imported/Neighbourhood-A4booklet.v4.pdf Green Suffolk - Green light for council's biodiversity vision https://www.greensuffolk.org/news/green-light-for-councils-biodiversity-vision/ https://www.greensuffolk.org/green-communities/ Suffolk Biodiversity Validation Requirements 2015 https://www.midsuffolk.gov.uk/assets/DM-Planning-Uploads/Validation-and-additional-guidance/Suffolk-Biodiversity-Validation-Requirements.pdf Babergh pledges to protect wildlife https://www.babergh.gov.uk/environment/climate-change/babergh-pledges-to-protect-wildlife/ South Gloucestershire Local Biodiversity https://www.southglos.gov.uk/environment-and-planning/countryside/wildlife/what-is-biodiversity/ South Gloucestershire Local Nature Action Plans Guidance https://beta.southglos.gov.uk/wp-content/uploads/Local-Nature-Action-Plans-guidance-for-town-and-parish-councils.pdf Berks, Bucks & Oxfordshire Biodiversity https://www.bbowl.org.uk/sites/default/files/2019-10/How%20to%20develop%20a%20Neighbourhood%20Plan.pdf Leicestershire County Council - What a Parish Council can do for biodiversity https://resources.leicestershire.gov.uk/sites/resource/files/field/pdf/2020/6/29/FS3-What-a-parish-council-can-do-for-biodiversity.pdf Warwickshire Wildlife Trust - Biodiversity Action Plans promotion

	<p>https://www.warwickshirewildlifetrust.org.uk/sites/default/files/2018-03/PARISH%20BIODIVERSITY%20ACTION%20PLAN%202014.pdf</p> <p>Sussex Wildlife Trust - Mapping Biodiversity in your local area https://sussexwildlifetrust.org.uk/discover/planning/strategic-planning/neighbourhood-plans/how-to-include-wildlife-in-neighbourhood-plans/mapping-biodiversity-in-your-local-area</p> <p>Craven Green Infrastructure and Biodiversity SPD https://www.cravendc.gov.uk/planning/spatial-planning/spds-and-information/green-infrastructure-and-biodiversity/green-infrastructure-and-biodiversity-spd/</p>
F:	Wildlife Trusts & County Biodiversity Information Services
	<p>Suffolk Wildlife Trust https://www.suffolkwildlifetrust.org/</p> <p>Suffolk Biodiversity Information Service https://www.suffolkbis.org.uk/</p> <p>Suffolk Ecological Networks Project https://www.suffolkbis.org.uk/sites/default/files/2022-05/Ecological%20Networks%20Methodology%202007_0.pdf</p> <p>Norfolk Biodiversity Partnership https://www.norfolkbiodiversity.org/habitats-and-species/</p> <p>Devon DBRC Resource Map https://www.dbrc.org.uk/neighbourhood-plans/</p>
G:	Biodiversity Good Practice / Toolkits
	<p>South Somerset Community Biodiversity Toolkit https://www.southsomersetenvironment.co.uk/biodiversitytoolkit https://ashpcsomerset.com/community-biodiversity-toolkit/</p> <p>Basingstoke Parish Wildlife Map Toolkit https://www.basingstoke.gov.uk/content/page/57854/Parish%20Wildlife%20Map%20Toolkit.pdf</p>
H:	Biodiversity Mapping Sources
	<p>ArcGIS Online https://www.arcgis.com/home/index.html https://livingatlas.arcgis.com/en/browse/#d=1&rgnCode=GB</p> <p>Living England Habitat Map (Phase 4) https://www.arcgis.com/apps/mapviewer/index.html?layers=b3069e7cb3084732b92478b3db51b9c6 + many more.</p>

	<p>MAGIC Map Application https://magic.defra.gov.uk/magicmap.aspx</p> <p>National Habitat Network Maps https://magic.defra.gov.uk/Metadata_for_magic/Habitat%20Network%20Mapping%20Guidance.pdf + many more.</p> <p>Natural England Geo-data Portal https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::priority-habitat-inventory-south-england/explore?location=52.143954%2C0.717461%2C12.94</p>
I:	Biodiversity Net Gain
	<p>Bath Biodiversity Net Gain https://beta.bathnes.gov.uk/biodiversity-net-gain</p> <p>Eastbourne Biodiversity Net Gain https://www.lewes-eastbourne.gov.uk/_resources/assets/inline/full/0/314723.pdf</p>
J:	Parish Biodiversity Reports / Appraisals / Surveys
	<p>Risby Wildlife Friendly Village https://www.wildlifefriendlyvillage.co.uk/</p> <p>West Bletchley and Biodiversity and Habitat Survey https://www.westbletchleycouncil.gov.uk/local-news/west-bletchley-biodiversity-habitat-survey</p>
K:	National Documents
	<p>National Planning Policy Framework 2021 (pages 50-54) 15. Conserving and enhancing the natural environment https://www.gov.uk/government/publications/national-planning-policy-framework--2</p> <p>The Natural Environment White Paper 'The Natural Choice' (2011) https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature</p> <p>Biodiversity 2020 'Strategy for England's Wildlife and Ecosystem Services' (2011) https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services</p> <p>Nature Recovery Network https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network</p>

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(9) DEFENCE INFRASTRUCTURE ORG., obo the MOD



Defence
Infrastructure
Organisation

Christopher Waldron

Ministry of Defence

Safeguarding Department

DIO Head Office

St George's House

DMS Whittington

Lichfield

Staffordshire WS14 9PY

Your reference: Wetheringsett cum Brockford
Neighbourhood Plan 2022 – 2037 Reg 16 consultation

Our reference: 10055335_Rev1

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Caileigh Gorzelak
Strategic Planning Policy Officer
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

10th March 2023

Dear Caileigh

It is understood that Babergh and Mid Suffolk District Councils are undertaking a consultation regarding their Wetheringsett cum Brockford Neighbourhood Plan 2022 – 2037 under Regulation 16. This document will guide the future development of the parish.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

The MOD may be involved in the planning system both as a statutory and non-statutory consultee with statutory involvement stemming from consultation occurring as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

Copies of these relevant plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

The area covered by the Wetheringsett cum Brockford Neighbourhood Plan will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites. RAF Wattisham is located to the South of the Wetheringsett cum Brockford Neighbourhood Plan authority area and benefits from safeguarding zones drawn to preserve the airspace above and surrounding the aerodrome.

Additionally, the MOD have an interest within the plan area, in a new technical asset known as the East 2 WAM Network, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Wetheringsett cum Brockford Neighbourhood Plan area of interest.

The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern. Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated

Where development falls outside designated safeguarding zones, the MOD may have an interest, particularly where the development is of a type likely to have an impact on operational capability by virtue of scale, height, or physical properties. Examples of these types of development include renewable energy development such as the installation of wind turbine generators or solar photo voltaic panels, or any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft. Solar PV development can compromise the operation of communications and other technical assets by introducing substantial areas of metal that degrade signals and, depending on the location of development, may produce glint and glare to the detriment of aviation safety. Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more.

The MOD should be consulted within the Wetheringsett cum Brockford Neighbourhood Plan 2022 – 2037 on any development within the statutory technical safeguarding zones that surround the East 2 WAM network and/or Wattisham Station which consists of structures or buildings exceeding statutory safeguarding technical criteria.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

C Waldron

Chris Waldron
DIO Assistant Safeguarding Manager