

Badwell Ash & Long Thurlow Neighbourhood Plan 2024 - 2038

Submission Draft consultation responses

In February 2025, Badwell Ash Parish Council (the 'qualifying body') submitted their draft Neighbourhood 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 10 March until Friday 25 April 2025.

Fifteen representations were received. They are listed below and copies are attached.

Badwell Ash Parish Council were also given an opportunity to respond to new issues raised at this stage. Their response is included at the end of the document.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Mid Suffolk District Council
(3)	Natural England
(4)	Environment Agency
(5)	Dedham Vale Society
(6)	Anglian Water
(7)	National Highways
(8)	Sport England
(9)	Defence Infrastructure Organisation (obo MOD)
(10)	Resident - B
(11)	Resident - K
(12)	Resident - M
(13)	Resident - P
(14)	Resident - R
(15)	Resident - T
(16)	Response from Badwell Ash Parish Council

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(1) SUFFOLK COUNTY COUNCIL

Date: 22nd April 2025
Enquiries to: Busranur Serin
Tel: 01473 265631
Email: neighbourhoodplanning@suffolk.gov.uk



Planning Policy Team,
Babergh District Council,
Endeavour House,
8 Russell Road,
Ipswich,
IP1 2BX

Dear Paul Bryant,

Submission Consultation version of the Badwell Ash & Long Thurlow Neighbourhood Plan

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Badwell Ash & Long Thurlow Neighbourhood Plan.

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

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

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

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

Archaeology

Within SCC's response to the pre-submission (Regulation 14) consultation stage, the following addition was recommended to be included in Chapter 11:

"Suffolk County Council Archaeological Service (SCCAS) manages the Historic Environment Record (HER) for the county, which holds numerous records for the parishes built and below ground heritage, as well as evidence of historic settlement and other cultural activity. Non-designated archaeological heritage assets would be managed in development through the National Planning Policy Framework (NPPF). SCCAS would advise that there should be early consultations of the Historic Environment Record (HER) and assessment of the archaeological potential of any potential development site at an appropriate stage in the design stage, in order that the requirements of NPPF and Babergh and Mid Suffolk Local Plan are met. SCCAS as advisors to Babergh and Mid Suffolk Council would be happy to advise on the level of archaeological assessment and appropriate stages to be undertaken."

This addition would provide clarity to developers for any future development sites, as well as bring the Neighbourhood Plan in line with Policy LP19 of the Babergh and Mid Suffolk Local Plan and with Paragraph 203 of the NPPF (2024).

The recommended text is a statement of process as the Parish Council have responded, but this does not mean it is not required to be clearly stated in the plan. Paragraph 5 (Ref: 18a-005-20190723) of the Planning Practice Guidance (PPG) states that "the historic environment record is a useful source of information on the local historic environment. The local planning authority heritage advisers can advise on local heritage issues to be considered when preparing a neighbourhood plan." It is important to make it clear that the HER needs to be consulted for all new development. This is not text that needs to be included within policy, but it should be incorporated in the supporting text of Chapter 11. Therefore, the above wording should be included for conformity and to be in line with Basic Condition A.

Natural Environment

Local Green Spaces

When looking at Appendix C: Justification for Local Green Spaces in the plan, the size measurements of all the Local Green Spaces (LGS1 to LGS19) have been provided in hectares except for LGS20: Pumping Station Forecourt, which is given in square meters. While this isn't a Basic Condition matter, this size measurement should be converted to hectares for consistency and clarity.

Public Rights of Way

Policy BALT10: Pedestrian and cycle connectivity

Within SCC's response to the pre-submission (Regulation 14) consultation stage it was commented that "This current policy does not make it clear if it expects SCC PROW to action and implement this point in the policy". Within the parish council's Consultation Statement they responded that "The role of SCC will be clarified.", however no change was actioned to fulfil this clarification.

SCC queries if this has been mistakenly missed out and needs to be revisited to action a suitable amendment.

It is recommended that an amendment is made to clarify SCC's query to accord with Paragraph 16' criterion d) of the NPPF (2024), which requires that plans policies should be "clearly written and unambiguous, so it is evident how a decision maker should react to development proposals".

To also help decision making, Paragraph 40 of the NPPF (2024) encourages early engagement and it states that “Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community”.

Therefore, to accord with the NPPF (2024) and to be in line with Basic Condition A, SCC recommends the following amendment for Policy BLAT10:

“Proposals which would contribute to making the parish safer and more accessible for pedestrians and cyclists and would contribute to the health and wellbeing of residents will be supported and SCC Public Rights of Way must be consulted, for which early engagement is advised.”

General

SCC notes that in the Consultation Statement responses 36 and 38 have Suffolk County Council labelled as the respondent, however these are not comments the County Council made at Regulation 14 Pre-Submission stage. Response 36 does raise the same issue as response 44, which was indeed provided by SCC. But the issue raised in response 38 was not from SCC.

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,

Busranur Serin
Planning Officer
Growth, Highways, and Infrastructure

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(2) MID SUFFOLK DISTRICT COUNCIL

Our ref: Badwell Ash & Long Thurlow NP R16 Response

Dated: 25 April 2025

From: Planning Policy Team, Babergh & Mid Suffolk District Council

To: The Independent Examiner

cc: Stephen Russell (Chair, NP Steering Group),
Andrea Long and Rachel Leggett (NP Consultants)

Sent by e-mail

Dear Examiner,

- **Submission draft Badwell Ash & Long Thurlow Neighbourhood Plan 2024 – 2038**
- **Regulation 16 stage comments from Mid Suffolk District Council**

This response is made for and on behalf of Robert Hobbs (Head of Strategic Planning ~ Planning Policy and Infrastructure).

We start by thanking the Parish Council for making several modifications to their Plan based on our Regulation 14 response (November 2024). With the passing of time, and publication of the new National Planning Policy Framework (NPPF) in December 2024 which led to our announcement that we will now prioritise a full review of the Joint Local Plan (JLP), rather than a Part 2 Plan, should now be reflected where appropriate to do so. We have suggested wording.

Our main concern at the Regulation 14 stage was draft Policy BALT 15 (Low carbon and eco-design), more specifically, the requirement it placed on this Council to impose a planning condition relating to Post Occupancy Evaluation Reporting. We also suggested that the matter could be dealt with by way of a follow-up meeting. This did not happen, but e-mails were exchanged. We pick this matter up again in our attached comments.

From both our previous response cover letter, and from other sources, the Parish Council will now also be aware that the new NPPF introduced a revised Standard Method for calculating local housing need, which increases the number of new homes to be planned for in Mid Suffolk by 37%, above the requirement set out in the JLP Part 1. No decisions have been made yet on where this Council considers it appropriate to make allocations to help deliver these new homes, but these will be consulted on at the appropriate times.

We trust that our attached comments are helpful and will be happy to answer any questions.

Kind regards,

Paul Bryant

Neighbourhood Planning Officer | Planning Policy Team

Babergh & Mid Suffolk District Councils

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Joint Local Plan

To reflect our decision to proceed with a full Joint Local Plan review, we suggest the following amendments to supporting text etc:

In **paragraph 2.5**, delete the last two lines, starting with “*except for the spatial distribution ... [etc].*”

For **paragraph 2.6**, reword as follows:

- 2.6 The two Councils had intended to bring forward a Part 2 Joint Local Plan, which would have identified a spatial distribution/settlement hierarchy, open spaces, and site-specific allocations. However, following publication of the new NPPF (Dec 2024), they announced that they would now proceed with a full Joint Local Plan review. The JLP, along with any Neighbourhood Plan, provides the basis for determining planning applications and future development on the local area and should be consistent with the National Planning Policy Framework.

At **Figure 3**, amend the JLP Part 2 box to read ‘emerging Joint Local Plan Review’

At **paragraph 7.20**, amend the last line to read: ‘... which are made in any forthcoming Part 2 Plan (now the Joint Local Plan Review).’

Also, a polite reminder that this neighbourhood plan should be consistent in how it refers to our Joint Local Plan. Variations persist which we suggest can be addressed by way of minor modifications to be agreed between Parish and District Council.

Design Guidance and Codes document

Set out below are our latest comments on the Design Guidance and Codes [DG&C] document, which is integral to Policy BALT1.

- Within the **tables on pages 29 & 31**, in **Figure 27**, at **paragraphs 7.10, 11.18 and 11.28**, and in the last sentence of **Policy BALT16** ... replace ‘Design Codes and Guidance’ with ‘Design Guidance and Codes’ to reflect the correct document title.
- Under **paragraph 1.9**, we suggest amending the DG&C entry to explain that this document was updated in February 2025, i.e., ‘... completed in Ju** 2024 (updated in February 2025).’ **Also**, is the quoted ‘June 2024’ date correct given that paragraph 7.7 states that it was completed in July 2024, and the revision history table at the start of the DG&C document also refers to an approved final draft dated August 2024?
- The **Contents page** and **paragraph 7.10** both explain that the DG&C document is included as Appendix B to this Neighbourhood Plan. At Appendix B, it states that this is an ‘attached document.’ Given that it is a separate document, would it be better to explain this more clearly?
- Within **Policy BALT 1** we welcome the inclusion of cross-references to relevant sections within the DG&C document. However, the quoted page numbers need amending, and one entry needs deleting otherwise the two documents will not be mutually compatible.

This error appears to stem from changes made to the DG&C document. The version available at the time of the Reg. 14 consultation (cover date August 2024) contained ‘Section 3.9 Parking’.

There is no 'Parking' section in the 'Updated February 2025' DG&C document that accompanied the Reg. 15 submission draft Plan. Consequently, the following changes, highlighted in green, need to be made to Policy BALT1:

Parish wide design guidance (pages 46 - 56 Sections 3.3 - 3.11)

- a. Settlement pattern and built form (Section 3.3)
- b. Extensions, infill, and backland development (Section 3.4)
- c. Heritage (Section 3.5)
- d. Landscape and rural feel (Section 3.6)
- e. Vernacular and architecture (Section 3.7)
- f. Eco-design (Section 3.8)
- ~~g. Parking (Section 3.9) * delete this entry *~~
- g. Sustainable drainage (Section 3.9)
- h. Biodiversity (Section 3.10)
- i. Commercial and community assets (Section 3.11)

... and under the Character areas sub-heading:

CA1: Historic Core (page 59)

CA2: Badwell Ash wider village (page 63)

CA3: Long Thurlow: (page 66)

CA4: Badwell Green (page 70)

CA5: Rural Hinterland (page 73)

Chapter 1

At **paragraph 1.13**, the area designation date should read 23rd September 2022. The quoted date refers to when the application was submitted.

Chapter 7

❖ New housing (pages 50 - 52)

Paragraphs 7.17 & 7.18: Our decision to undertake a Joint Local Plan review prompts the need for some amendments to these paragraphs, for context reasons alone.

In paragraph 7.17, this can be achieved as follows by replacing 'is' with 'was':

- '... parish between 2018 and 2037 was 150 dwellings for Badwell Ash', and
- 'The 150 dwelling figure was a 'commitment' figure in that ...'

In paragraph 7.18, we suggest the following:

'The figure for Long Thurlow was more complex. It was comprised of 3 dwellings that were already committed, with the remaining 15 originally made up from ... [etc] ...'

❖ Policy BALT2: Scale and pattern of new housing development

It would be helpful if this policy also included a cross reference to JLP policy relating to development proposals outside of identified settlement boundaries. Table 5 under JLP Policy SP03 refers. A small modification to the last paragraph is suggested:

‘Proposals for development outside of the identified settlement boundaries will only be supported where it meets the criteria set out in the NPPF (paragraph 84, Dec 2024), [relevant district level policy](#), or is an exception site for affordable housing to meet identified local needs in accordance with Policy BALT4.’

❖ **Settlement Boundaries** (paragraphs 7.21 to 7.23, and Figures 31 and 32)

We start with a proposed minor modification, which is to move the ‘Neighbourhood Plan Settlement Boundaries’ sub-heading to sit before paragraph 7.21.

Following removal of the November 2020 JLP settlement boundary maps from the this plan (our Reg. 14 response refers), and having re-read the supporting text, we now think it would be helpful if this was also modified to provide clarity on the historic status of the settlement boundaries at both Badwell Ash and Long Thurlow. We have taken paragraphs 7.21 to 7.23 as written but have amend these in part (see below). Please also note the proposed amendments to Figures 31 and 32.

7.21 Policy SP03 [also](#) refers to settlement boundaries. [For Badwell Ash, this means the settlement boundary established through the 1998 Mid Suffolk Local Plan, which was then carried forward by the 2008 Mid Suffolk Core Strategy and now by Part 1 of the JLP. At Long Thurlow, a settlement boundary previously set out in the 1998 Local Plan was removed by the 2008 Core Strategy when the area was re-designated as a countryside village. Consequently, there is no current settlement boundary in force for Long Thurlow. For those places with settlement boundaries, the established approach is that development within them is likely to be acceptable in principle, subject to the details being worked out. Development proposals outside of established settlement boundary are restricted to certain use types or are otherwise required to demonstrate a justifiable exception to adopted policy guidance.](#)

7.22 Given the time that has elapsed since the settlement boundary [at Badwell Ash](#) has been reviewed, and the level of new development that has taken place since, this Neighbourhood Plan proposes a [new](#) settlement boundary [here](#) which includes [both](#) completed and permitted sites [\(at Feb 2025\)](#). This new settlement boundary is shown [in Figure 31 \(and on the Policies Map\)](#).

Retain Figure 31 but delete the words ‘as defined in the Local Plan’ from the Key and the word ‘Below,’ from the figure title.

7.23 [As noted earlier, JLP Part 1 does not identify a settlement boundary at Long Thurlow.](#) However, it is recognised that the built-up area of Long Thurlow (within the Neighbourhood Plan Area) consists of in excess of 60 dwellings and has seen some new development in recent years. Therefore, this Neighbourhood Plan identifies a new settlement boundary for Long Thurlow, based largely on [a proposal that had been put forward by Mid Suffolk in a much earlier iteration of their JLP, but](#) with some minor additions to reflect development on the ground. [This new](#) settlement boundary is shown [in Figure 32 \(and on the Policies Map\)](#).

Retain Figure 32 but delete the word ‘Proposed’ from the Key, and the word ‘Revised’ from the figure title.

One final thought on this matter. As part of our work on the Joint Local Plan review, all settlement boundaries across Babergh and Mid Suffolk may be subject to further review. For example, we could include those dwellings that sit south of Long Thurlow Road but fall within the parish of Great Ashfield into a newly proposed boundary which, of course, this neighbourhood plan cannot do.

❖ **Housing Mix** (paragraph 7.32 and implications for Policy BALT3)

We see that **paragraph 7.32** has been amended to now include a note, in brackets, explaining that First Homes are no longer a housing option. Presumably, this is a nod to changes introduced through the December 2024 NPPF. However, the text that follows, and Policy BALT3, do still refer to a requirement to deliver a percentage of First Homes at a discount of 40%. The note therefore introduces an element of confusion, and we suggest the simplest solution would be to delete it.

If the above is considered appropriate, as an aside, it might also be worth revisiting footnote 8 on page 60 to see if this needs to be t into some sort of date context.

Also relevant is that this Neighbourhood Plan was submitted to Mid Suffolk District Council before 12 March 2025, in which case the transition arrangements [NPPF, Dec. 2024, para. 239] do allow for it to be examined against the December 2023 NPPF, which of course refers to First Homes.

Chapter 11

❖ **Low carbon and eco-design** (paragraphs 11.13 to 11.24 and Policy BALT15)

We thank the Parish Council for taking the initiative to amend what is key policy for them. As now worded, both Policy BALT15 and supporting text offer broad support for proposals offering enhanced energy efficiency, rather than the checking system by way of an imposed planning condition that was of concern to us.

We note that the opening part of the original second paragraph of the policy has been retained. This reads: “Proposals for new and refurbished buildings must demonstrate that they have been tested to ensure the buildings will perform as predicted.”

While we would still prefer for this text to be deleted on the grounds that it won't be possible to demonstrate testing for performance at the proposal stage, and implementation of this would potentially be particularly difficult if we were looking at a proposal for refurbishment of an existing dwellings, it may be more feasible in the case of a new dwelling.

On a minor modification point, the cross-reference in paragraph 11.22 to POE provision should now read: “...paragraph 11.21 above ...” and not paragraph 11.20. This is simply a consequence of re-numbering what were two separate paragraphs labelled 11.15 in the Reg. 14 version Plan.

Non-designated Heritage Assets

Set out below are our thoughts on the changes made by the Steering Group to the Non-designated Heritage (NdHA) elements of this Plan in response to our Reg.14 comments. These are replicated on page 253 of the Consultation Statement.

- Rumbles Fish Bar (BALT20, #1): The Appendix D entry now show the buildings age as 20th Century but is otherwise unchanged. A search of our records shows grant of a planning

permission for the erection of a Takeaway Fish Bar dating to July 1982 [our ref # 0384/82, but no application documents available]. This would suggest that this is a modern building. The Landmark Status and Historic Interest are potentially relevant considerations, but otherwise, the text focusses more on what has been lost. We also remind ourselves that the Fish Bar is identified as a Community Facility (Policy BALT6, d.). so is afforded a degree of protection anyway.

- Cornish Cottages (BALT20, #23): We queried this entry because we felt that its late date (post WW2) and potential lack of preservation counted against it. We also felt that this type of construction is not sufficiently rare and noted that Historic England's Local Listing guidance does not appear to specifically define 'local' in this context. 'Local' could therefore be interpreted as the asset having sufficient historic interest at a district level, rather than just a parish level. All that said, we do also accept that these cottages are described as the only example of their type in Badwell Ash. Perhaps one to re-consider if or when this Plan is reviewed at a future date.

We also offered suggestions for potential inclusions to the list of NdHAs. We see that, for example, Walnut Tree Cottage (BALT25, #30) has now been added but that others have not, for example, Moat House, which would have made a pairing with BALT22, #25 (the Moat at Moat House). Including Moat House now may not be appropriate given that this has not been publicly consulted on, so perhaps now best left as one to re-consider in any future review.

Chapter 14. Area Specific Policies: Long Thurlow

Just two minor modification proposals:

- Start the second sentence of paragraph 14.3 with 'This' (not 'These')
- On Figure 45, annotate the map to identify the LGS as no. 20

[Ends]

(3) NATURAL ENGLAND

Date: 24 April 2025
Our ref: 505497
Your ref: Badwell Ash & Long Thurlow Neighbourhood Plan

Mr Paul Bryant
Babergh & Mid Suffolk District Councils

BY EMAIL ONLY
communityplanning@baberghmidsuffolk.gov.uk



Hornbeam House
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CW1 6GJ
T 0300 060 3900

Dear Mr Bryant

Badwell Ash & Long Thurlow Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 10 March 2025.

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

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

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

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

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

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

Yours sincerely
Sally Wintle
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 \(England\)](https://www.gov.uk/government/publications/national-parks-in-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 from [the Association of Local Environmental Records Centres](http://www.local-environmental-records-centres.org/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². 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](#)³.

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/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁷ sets out supporting guidance.

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

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or 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.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. 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](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ 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 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. 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 and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- 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 reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

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. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- 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).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

(4) ENVIRONMENT AGENCY



Rachel Leggett
The Village Hall The Street
Badwell Ash
Bury St. Edmunds
IP31 3DG

Our ref: AE/2025/130372/01-L01
Your ref: BALTNP
Date: 25 April 2025

Dear Rachel

BADWELL ASH AND LONG THURLOW REGULATION 16 NEIGHBOURHOOD PLAN

BADWELL ASH & LONG THURLOW

Thank you for consulting us on the regulation 16 consultation for the Badwell Ash and Long Thurlow Neighbourhood Plan.

For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.

A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan.

Environmental Constraints

We have identified that the Neighbourhood Plan Area will be affected by the following environmental constraints:

Flood Risk

Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within the neighbourhood plan area along Stowlangtoft Stream.

On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. Nevertheless, we recommend the inclusion of relevant policies to cover the management of flood risk. Allocation of any sites and any windfall development delivered through the Plan period should follow the sequential approach. [National Planning Policy Framework](#) (NPPF) paragraph 167 sets this out.

Water Resources

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licencing strategies (CAMS process) - GOV.UK (www.gov.uk).

Contaminated Land

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

provide assurance that the risk to the water environment is fully understood and can be addressed through appropriate measures. This is because Badwell Ash and Long Thurlow Neighbourhood Plan Area is a source protection zone 1, 2 and 3 as well as on a principal Aquifer. For any planning application the prior use should be checked to ensure there is no risk of contamination.

Source Protection Zones

Your plan includes areas which are located on Source Protection Zones 1, 2 and 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: <https://www.gov.uk/government/collections/groundwater-protection>

Biodiversity Net Gain

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. Identifying sites for the delivery of [Biodiversity Net Gain](#) could lead to habitat improvements in your area. Biodiversity Net Gain is a system that delivers habitat improvements on any local sites including [Local Wildlife Sites](#) to ensure that there is no loss of habitats from new development. Identifying areas that could benefit from management for conservation within your area could enable habitat to be created closer to development sites in your plan area, providing local ecological enhancement.

Informatives

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: [How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning](#)

We trust this advice is useful.

Yours sincerely

Mr Andrew Thornton
Planning Advisor

Direct dial: +44 20 3025 3127

Mobile: 07826434908

Direct e-mail: andrew.thornton@environment-agency.gov.uk

Team e-mail: Planning.EastAnglia@environment-agency.gov.uk

(5) DEDHAM VALE SOCIETY

E from: Mr Shearer (Deputy Chairman, Dedham Vale Society)
Rec'd: 10 March 2025
Subject: Re: Consultation on R16 Badwell Ash & Long Thurlow NP (Mid Suffolk DC)

The Dedham Vale Society will not be commenting on this, as it lies outside our geographic area.

Best wishes

William Shearer
Deputy Chairman, Dedham Vale Society

E: info@dedhamvalesociety.org.uk

* * * * *

On 10 Mar 2025, at 11:00, BMSDC Community Planning wrote:

This e-mail has been sent obo Robert Hobbs (Head of Strategic Planning - Planning Policy and Infrastructure)

Dear Sir / Madam

Consultation under Reg' 16 of the Neighbourhood Planning (General) Regulations 2012 ~ the Badwell Ash & Long Thurlow Neighbourhood Plan 2024 - 2038

We are contacting you because you are a statutory consultee, or because you / your client have expressed an interest in planning matters in the parish of Badwell Ash (Suffolk).

The Parish Council submitted their draft Neighbourhood Plan to Mid Suffolk District Council last month and, today, we commence formal consultation on this. **Written comments** are being invited on whether or not this plan meets the basic condition tests against which it will be examined. These comments **must arrive by no later than 4:00pm on Friday 25 April 2025**.

Further details are set out in the attached letter. Because of its file size, we have not attached a copy of submitted plan to this email but a link to this and the other required documents can be found on our website by going to: <https://www.midsuffolk.gov.uk/w/badwell-ash-long-thurlow-neighbourhood-plan>

Yours faithfully,

Paul Bryant
Neighbourhood Planning Officer | Planning & Building Control
Babergh & Mid Suffolk District Councils – Working Together
T: 01449 724771 / 07860 829547
E: As per this email or paul.bryant@baberghmidsuffolk.gov.uk
W: www.babergh.gov.uk / www.midsuffolk.gov.uk

[Ends]

By Email: communityplanning@baberghmidsuffolk.gov.uk
Planning & Building Control, Babergh & Mid Suffolk District Councils

25th April 2025

Dear Mr. Bryant,

Anglian Water Services
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU

www.anglianwater.co.uk

Our ref: Badwell Ash & Long Thurlow NP/ Reg
16 response

Badwell Ash & Long Thurlow Neighbourhood Plan (Reg 16 consultation) - Anglian Water response

Thank you for consulting Anglian Water on the draft Badwell Ash & Long Thurlow Neighbourhood Plan.

Preamble

Anglian Water is the statutory water and sewerage undertaker within the designated area and is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012 and we support neighbourhood plans and their role in delivering environmental and social prosperity in the region.

Overall, Anglian Water is the water supply and water recycling provider for over 6 million customers. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea. Additionally, parts of the area have the highest rate of housing growth in England.

Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. Anglian Water has produced a specific guidance note on the preparation of NPs found using this link under our Strategic Growth and Infrastructure webpage - [Strategic Growth and Infrastructure \(anglianwater.co.uk\)](http://www.anglianwater.co.uk) The guidance also has sign posting/ links to obtaining information on relevant assets and infrastructure in map form, where relevant.

Anglian Water is committed to ensuring that development in our region continues to thrive while protecting our assets, existing customers and the environment. We want to ensure that growth aligns with environmental responsibilities and infrastructure capacity.

Anglian Water delivers new water supply and sewerage services across our region to support sustainable growth in the fastest growing region of England. The infrastructure we deliver is primarily funded in two ways, including:

- 1) Developers pay infrastructure charges to connect to, and where necessary provide additional capacity for our water supply and sewerage networks, which are governed by Ofwat's charging rules; and
- 2) Water and sewerage charges agreed by Ofwat every five years, paid by our customers to fund our investment programme on past and future infrastructure to:
 - Address a rapidly growing population;
 - Ensure we are resilient to impacts of climate change;
 - Enhance our environment to reach the environmental destination agreed with customers and regulators; and
 - Secure future water supplies.

Detailed response on the draft neighbourhood plan

The comments set out below are made, ensuring the making of the plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water. Overall, we are supportive of the policy ambitions within the neighbourhood plan, subject to the proposed amendments.

POLICY BAL1: Design guidance and Codes – SUPPORT, REQUESTS ADDITIONAL TEXT

Design guidance and Codes document

The checklists are a generic set of guidelines and do not include Parish wide design elements which are helpfully covered in the preceding sections of the document, in particular Eco-design (Section 3.8); Parking (Section 3.9); Sustainable drainage (Section 3.10); Biodiversity (Section 3.11). For example, permeable surfacing for parking and other hard standing areas is not referred to and should be listed under checklist 10. Water management and efficiencies should be covered under Checklists 1 and 8.

POLICY BAL8: Infrastructure – SUPPORT, REQUESTS ADDITIONAL TEXT

POLICY BAL9: Flood risk and mitigation – SUPPORT, NO REQUESTED CHANGES

Anglian Water welcomes the neighbourhood plan policies of seeking new development to be served by sustainable infrastructure provision and that does not result in a detrimental impact on water infrastructure, including sewers and surface water and other flooding and that this should take account of climate change.

Wastewater and water infrastructure

In accordance with Joint Local Plan Policy LP26 – Water resources and infrastructure Plan developers will need to demonstrate that there is sufficient water available to support the proposed development and that adequate mains foul water treatment and disposal already exists or can be provided in time to serve the development.

Anglian Water, therefore, encourages developers to engage in early discussions with our pre-development team [Developing \(anglianwater.co.uk\)](http://anglianwater.co.uk) so that connections to a sustainable point of connection (SPOC) or any upgrades to our network are addressed when planning applications are submitted to the local planning authority. We recommend that suitable wording is added to the neighbourhood plan at paragraphs 8.13 – 8.17 in the supporting text.

Flood risk and drainage

Anglian Water notes the neighbourhood plan refers to flooding concerns within the area and is supportive of measures to address flood risk, including surface water run-off under Policy BALT9. The Design Guidance and Codes document also offer some practical advice on sustainable drainage.

Anglian Water is supportive of this policy approach, including the preference for this to be managed using Sustainable Drainage Systems (SuDS) and requiring permeable surfaces for new areas of hardstanding within developments to comply with the drainage hierarchy. Such measures help to avoid surface water run-off from entering our foul drainage network, and connections to a surface water sewer should only be considered where all other options are demonstrated to be impracticable. Any requirements for a surface water connection to our surface water sewer network will require the developer to fund the cost of modelling and any upgrades required to accept the flows from the development.

Anglian Water encourages the use of nature-based solutions for SuDS wherever possible, including retrofitting SuDS to existing urban areas to enhance amenity and biodiversity within the neighbourhood plan area and contribute to green and blue infrastructure.

It has been the intention of Government to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England. However, we welcome the policy approach to ensure SuDS measures are incorporated within new developments, until such time these measures are in place.

POLICY BALT14: Biodiversity – SUPPORT, SEEKS ADDITIONAL TEXT

Anglian Water supports the policy in prioritising the delivery of biodiversity net gains within the neighbourhood planning area to support habitat recovery and enhancements within existing and new areas of green and blue infrastructure. We would also support opportunities to maximise green infrastructure connectivity including through opportunities to minimise surface water run-off from existing urban areas through the creation of rain gardens for example.

There may be benefit in referencing the emerging Suffolk Local Nature Recovery Strategy ([Local Nature Recovery Strategy \(LNRS\) - Suffolk County Council](#)) which will identify priority actions for nature and map specific areas for improving habitats for nature recovery.

Anglian Water has made a corporate commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats on all AW-owned land.

Policy BALT15: Eco Design and Low Carbon – SUPPORT, NO REQUESTED CHANGES

Water resources

Anglian Water's water resources management plan (WRMP) for 2025-2050 identifies key challenges of population growth, climate change, and the need to protect sensitive environments by reducing abstraction. Managing the demand for water is therefore an important aspect of maintaining future supplies. See [Water resources management plan \(anglianwater.co.uk\)](#)

As a region identified as seriously water stressed, we encourage measures to improve water efficiency in developments. This can be achieved by a fixtures and fittings approach, including through rainwater/storm water, harvesting and reuse, and greywater recycling. Such measures to improve water efficiency standards and opportunities for water reuse and recycling also reduces the volume of wastewater needing to be treated by our water recycling centres. This will help to reduce customer bills (including for other energy bills) as well as reduce carbon emissions in the supply and recycling of water.

Given the proposed national focus on water efficiency, Anglian Water encourages Local Plans and Neighbourhood Plans to cover this issue through a policy-based approach. Anglian Water has produced a Water Efficiency Shared Standards with other partners (the Environment Agency, Natural England and Cambridge Water) on the imperative for development plan policies to achieve tighter water efficiency standards than the optional standard of 110 litres per person per day (l/p/d) for new homes.

This position is reinforced by the direction taken by the Government Department DEFRA which supports the need to improve water efficiency Plan for Water: our integrated plan for delivering clean and plentiful water - GOV.UK (www.gov.uk) and the Government's [Environment Improvement Plan](#) which sets ten actions in the Roadmap to Water Efficiency in new developments, including consideration of a new standard for new homes in England of 100 litres per person per day where there is a clear local need, such as in areas of serious water stress. It has recently been announced by Government that a review of the Water Efficiency Standard(s) within the Building Regulations 2010 (Part G2 of the Approved Documents) will be consulted on in the next few months.

For water supply for non-household use*, Anglian Water now has a threshold of 20m³ a day for consideration of whether meeting that commercial/ industrial request could jeopardise domestic supplies for households. This is due to pressure on water supplies because of abstraction reduction, climate change and a fast-growing population. As a result, the gap between the demand for water and our supply (headroom) has shrunk. Prospective applicants are advised to contact Anglian Water at planningliaison@anglianwater.co.uk to avoid situations where water intensive demand projects progress to site acquisition, design or planning applications without establishing that a water supply and wastewater solution is feasible.

**Water supply for toilets and welfare facilities, as well as firefighting fall with the domestic definition.*

JLP Policy LP23 'Sustainable Construction and Design' encourages achieving water usage of not more than 100 litres per person per day for residential developments.

Anglian Water welcomes the references to water use and water stress in paragraphs 11.5 - 11.16 of the neighbourhood plan. The Design Guidance and Codes document also offers some practical advice on water re-use and recycling, rainwater and stormwater harvesting, and other suitable measures which can be incorporated into new development.

POLICY BALT19: Local Green Spaces – SUPPORT, NO REQUESTED CHANGES

POLICY BALT24: Local Green Spaces – OBJECTION, SEEKS DELETION OF DESIGNATION

The policies designate a number of areas of Local Green Spaces (LGS) within the neighbourhood plan area. The policies are explicit that managing development within a LGS should be consistent with national policy

for Green Belts i.e. paras. 153 – 155 of the NPPF. Anglian Water has assets forming part of our water and water recycling network located within or in the vicinity of these designated areas of local green space.

For information, maps of Anglian Water's assets detailing the location of our water and water recycling infrastructure are available at: www.utilities.digdat.co.uk

We consider the policies provides scope for Anglian Water to undertake operational development to maintain and repair any underground network assets that may be within these areas, such as sewers, rising mains and mains water pipes, which would be consistent with the policy tests to upgrade or maintain these assets, and are generally 'permitted development'.

However, land identified under Policy BALT14 at Long Thurlow is in the ownership of Anglian Water adjacent to a sewer pumping station building. The area is clearly marked as needing to be always kept available and utilised as a parking area to attend to the pumping station.

The designation as LGS could potentially place an unnecessary policy burden which could limit our ability to undertake maintenance of such critical infrastructure and the ability to bring forward investment if required at this location. For example, some works could require planning permission or engineering operations e.g. the laying of hardstanding, could be deemed inappropriate development unless it can be demonstrated that it does not conflict with any openness of the designated land. There is also a nearby water recycling centre (sewer treatment works) in connection with this site serving the sewer catchment for the Parish.

The NPPF (para. 107) states a Local Green Space designation should only be used when the green space is:

"a. in reasonably close proximity to the community it serves.

b. demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field) tranquillity and richness of its wildlife; and

c. local in character and not an extensive tract of land."

In terms of criterion (b), the justification made as a reason for its inclusion is that the grassed area has become a space in a convenient central location to advertise Hamlet and Parish activities. This does not mention the site provides any *"beauty, historic significance, recreational value (including as a playing field) tranquillity and richness of its wildlife"* in order for it to be realistically considered. The proposed designation is, therefore, not justified under this criterion. All three criteria (a-c) must also be met to be capable of designation.

We are not aware of any formal agreement to accommodate a public notice board, although there may have been an informal arrangement between parties at some point. From images on Street View via Google Maps, it appears there was a notice board, but more recently (from 2022) there is not one in place with new signage regarding keeping the area free of parking for 24-hour access to the site, as shown at the end of this letter.

The NPPF (para. 106) is clear that designating land as LGS should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. LGS should only be designated when a plan is prepared and be capable of enduring beyond the

end of the plan period. Anglian Water objects to the inclusion of this land as LGS for all the reasons set out above in terms of the site forming part of a critical sewage infrastructure site, rather than as an important area of local green space.

The relevant basic conditions are:

- Must be appropriate having regard to National Policy; and
- Must contribute to the achievement of sustainable development.

We respectfully request that the existing sewage pumping station is removed from the proposed LGS designation and the Proposals Map amended accordingly.

If you have any questions about this response or wish to discuss anything I have raised, please do not hesitate to get in touch. We wish to be kept informed on further stages of the plan's preparation via strategicgrowth@anglianwater.co.uk Thank you.

Yours sincerely,

C. Murphy (signed)

Carry Murphy

Chartered Town Planner - MRTPI

Spatial and Strategic Planning Manager – Sustainable Growth

Quality & Environment

Long Thurlow Local Green Spaces

Policy BALT25: LGS20	
Description: Pumping Station Forecourt	
In reasonably close proximity to the community it serves	The area of green space is located on the northern side of the Long Thurlow road which is the central spine of the hamlet
Demonstrably special to a local community and holds a particular local significance	<ul style="list-style-type: none">The grassed area is owned by Anglia Water and is directly in front of their pumping station before the road. It has however also become a convenient location, central to the village for the community to use as a space to advertise Hamlet and Parish activities. Temporary sign boards are used to display notices and cascade information to residents.
Local in character and is not an extensive tract of land	Yes, the area of grass is approximately 20 sq. meters.



[PLEASE NOTE: This page has intentionally been left blank]



(7) NATIONAL HIGHWAYS

HC id: NH/25/10332

Badwell Ash NP Consultation,
c/o Planning Policy Team

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

Email:
communityplanning@baberghmidsuffolk.gov.uk

Mark Norman
Spatial Planner Manager

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

24 April 2025

Dear Sir/Madam,

Consultation on the Badwell Ash & Long Thurlow Neighbourhood Plan – Reg 16 Submission Consultation - 10th March 2024 to 25th April 2025.

National Highways welcomes the opportunity to comment on the Regulation 16 of the Neighbourhood Planning Consultation of the Badwell Ash & Long Thurlow NDP which covers the plan period from 2024 to 2038.

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 Badwell Ash & Long Thurlow NDP, our principal interest is in safeguarding the operation of the SRN in the vicinity of the neighbourhood plan area, although, it should be noted, the area is located circa. 5 km from the nearest SRN connection, the A14 (local SRN managed by National Highways).

We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Badwell Ash & Long Thurlow is required to be in conformity with the Babergh and Mid Suffolk Joint Local Plan 2023-2037, the Town & Country Planning Act 1990, the

Planning & Compulsory Purchase Act 2004, the Localism Act 2011 and the Neighbourhood Development Planning Regulations 2012.

It is our understanding that “The NPPF 2023 (paragraphs 67 and 68) requires LPAs to provide neighbourhood groups upon request with a definitive or an indicative number of houses to plan for over the Neighbourhood Plan period. Mid Suffolk has fulfilled that requirement by providing Badwell Ash and Long Thurlow with an indicative Housing Requirement Figure of 150 dwellings. The 150 dwelling figure is a ‘commitments’ figure in that these dwellings have either been constructed, are under construction or have the benefit of planning permission”, as per section 2.15 of the Badwell Ash and Long Thurlow Neighbourhood Plan Housing Needs Assessment (AECOM, 2024). It is therefore noted that other than the already existing planning permissions, the plan does not seek to promote any further significant housing developments. National Highways would expect to be consulted as and when any new planning applications come forward in the usual way to confirm each application will be assessed by standard procedure in relation to their expected distribution and impact on the SRN.

Upon the review of the Transport objectives, National Highways agrees with the promotion and encouragement of more sustainable choice of travel options set out as part of Section 9, Objective 3 related to accessibility (policy BALT10, BALT12), as well as, promoting modal shifts towards sustainable modes, improving accessibility of developments to sustainable modes and improving existing local transport infrastructure.

Having reviewed the document, we note that the scale of growth remains negligible and is unlikely to impact the nearby SRN. Any new planning application will be assessed accordingly to consider the impact on the nearby SRN.

National Highways therefore considering the limited level of growth proposed across the neighbourhood plan area, it is unlikely to have a significant impact on the operation of the SRN.

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

Yours sincerely,

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

(8) SPORT ENGLAND

E from: Planning.Central@sportengland.org
Rec'd: 14 March 2025
Subject: RE: Consultation on R16 Badwell Ash & Long Thurlow NP (Mid Suffolk DC)

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 104 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

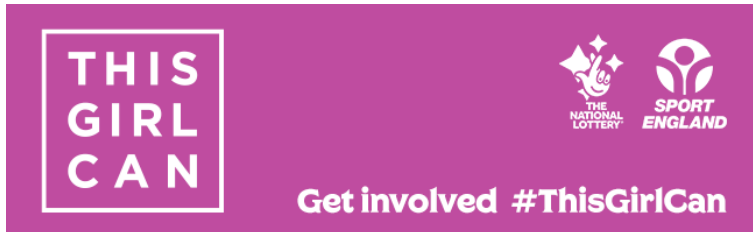
(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Technical Team

E: planning.central@sportengland.org



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We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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(9) Defence Infrastructure Organisation (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:
Badwell Ash & Long Thurlow Neighbourhood
Plan Reg 16 consultation

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Paul Bryant
Neighbourhood Planning Officer
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

25th April 2025

Dear Paul

It is understood that Babergh and Mid Suffolk District Councils are undertaking a consultation regarding their Badwell Ash & Long Thurlow Neighbourhood Plan Regulation 16 documentation. 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.

Paragraph 102 of the National Planning Policy Framework (December 2024) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs 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 to Local Planning Authorities by the Department for Levelling Up.

Copies of these relevant plans, in both GIS shapefile and .pdf format are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant

safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address.

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

The area covered by the Badwell Ash & Long Thurlow 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 including Wattisham Station and the Eastern WAM Network.

Eastern WAM (Wide Area Multilateration) Network is a new technical asset, 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 Capel St Mary Neighbourhood Plan authority area.

Wattisham Station is located to the Northwest of the Badwell Ash & Long Thurlow Neighbourhood Plan regulation 16 consultation authority area and benefits from a safeguarding zone drawn to preserve the airspace above and surrounding the aerodrome to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome.

New development may have detrimental impacts depending on site location relative to safeguarded sites and assets.

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of each of the safeguarding zone types is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

- The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Zones are drawn that trigger consultation on development of various heights to ensure that their effect on the protected airspace above and surrounding an aerodrome is assessed and, if necessary, mitigated. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.
- Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing, and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to provide large expanses of metal at height, for example where proposals include a wind turbine or roof mounted solar PV system.

In addition to the safeguarding zones identified, the MOD may also have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:

- Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of

electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.

- 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; and,
- 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

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

A handwritten signature in black ink, reading 'C Waldron'.

Chris Waldron
DIO Assistant Safeguarding Manager

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(10) Resident - B

Rec'd: 17 April 2025

Subject: BALT NP Reg 16 Consultation

[MSDC Note: This representation is presented as received with use of larger font etc.]

The comments below are my personal views of the Draft Badwell Ash and Long Thurlow NDP 2024 - 2038 , published in March 2025.

Section Section 7.23 Proposed Settlement Boundary - Long Thurlow

This implies there is no recognised Settlement Boundary (SB) in Long Thurlow but I submit that the implication in 7.23 is wrong and that the proposed SB requires amendment.

1.

The evidence of a recognised SB for Long Thurlow is wholly clear in several planning decisions, where consent was refused due to, inter alia, the proposals being for development outside the SB , for example DC/ 19/ 04946 ; DC / 18/ 03452 ; DC /21/ 06564 ; DC / 20/ 03350 ; DC /18/ 02804 .

It is therefore unarguable that the Local Planning Authority and the Planning Inspectorate recognise the existence of a valid and current Long Thurlow SB.

2.

The March 2025 Draft BALT NP proposes adoption of a "new" SB for Long Thurlow , at variance to the existing , by redrawing and extending parts of the SB northern boundary but other than a new line on a map the Draft is silent on:

a) details of the proposed changes and their potential impact b) any consultation process that was conducted c) who proposed the changes d) the criteria used to evaluate the changes e) the benefits to the community as a whole f) the planning history and g) why the existing SB could not simply be revised to include only the recently approved developments at Blackthorn and the 3 dwellings at Cutcheys Field adjacent to Moat Farm.

In addition to including new developments ,the proposed "new SB" also includes an expansion of the SB .This would result in properties west of Blackthorn having all of their land within the proposed SB boundary whereas at present, the SB boundary excludes the more northern parts of such land .

I say the proposed SB extension west of Blackthorn is unnecessary (see 3 below) and potentially provocative since it ignores the planning history (see 4 below).

3.

There is no regulatory, legislative or advisory requirement for any SB to be drawn in a straight line between 2 points or to follow individual property boundaries at their extremes . Significantly ,section 7.18 of the Draft BALT NP sets out the absence of any proposed further development for Long Thurlow ,ergo , the Long Thurlow SB does not need modification to anticipate or take account of any planned additional development in the medium or long term .

4.

By any measure , there has been a contentious planning history in Long Thurlow during the past decade or so , with Appeals and Judicial Reviews against a number of decisions, including properties directly affected by the draft proposed SB changes .All of this history seems to have been ignored or discounted in compiling the Draft .

5.

Beyond doubt, existence and use of the present SB in decisions by planning bodies and the courts has played an important part in preventing inappropriate and speculative development. Coterminal, the existing SB has helped enable the implementation of both local and national development plan policies by providing a level of certainty for residents, developers and land owners in terms of what and where development is likely to be permitted and where it is unlikely .

CONCLUSIONS

Changing or creating a SB requires more detailed consideration than the current draft BALT NP seems to have used .

The proposed “new” SB should mirror the line of the SB already in use but with it’s boundary modified solely to include the Blackthorn and Cutcheys Field properties .

The Draft BALT NP would benefit by the addition of a section setting out the generic purposes of an appropriate Settlement Boundary , the benefits , the linkage to the overall NP and a context for it’s inclusion in a Neighbourhood Plan. A SB should support the plan-led system , the requirements for decision consistency, take account of the planning history and previous decisions and be based on any pre-existing SB .

[Ends]

(11) Resident - K

Rec'd: 20 March 2025

Subject: BALT NP Reg 16 Consultation

In response to the information you released on 10th March. I did not receive this as apparently you only sent it to "people who commented on the last draft". However it has come to my attention that there are matters in this version that I want to comment on.

1. Draft Badwell Ash & Long Thurlow NDP 2024 -2038 : Section 7.23 p 53 - 54 : Proposed Settlement Boundary

1.1 The commentary suggests that there has not previously been a settlement boundary for Long Thurlow. This is strange as I have been a resident here for more than 20 years and was always aware of the existence of a settlement boundary. Indeed I have seen that boundary on council planning documents - I don't have a copy but I do have the link where it used to be available <https://www.babergh.gov.uk/assets/Strategic-Planning/JLPReg19/Part-3-Mid-Suffolk-Settlement-Maps-A-O.pdf> . The document indicated by the link has been removed.

1.2 At an early stage of this consultation I distinctly remember talking to a planning consultant at a presentation at Badwell Ash village hall to point out that the maps shown then did not record the settlement boundary.

1.3 So far as I was aware the settlement boundary for Long Thurlow was NOT an element that was up for discussion in the village plan; but it appears I was wrong. I now understand that:

- a) A settlement boundary is being proposed for "adoption".
- b) That this boundary largely follows the line of the earlier settlement boundary as shown on earlier planning documents, the document I have tried to refer to above.
- c) That there was a discussion about the property Blackthorn which somehow got built fairly recently outside the previous settlement boundary. It was proposed to amend the boundary so that Blackthorn would now fall within it.
- d) You then received a comment from the householder at Cadogan House. This is detailed in the document "A Consultation Statement (January 2025)". Refer to Appendix 6: Ref 29 : p 125 -126.
- i) This comment notes that at this property the proposed settlement boundary does not follow the boundary of the property, but rather cuts across the garden. This pattern is repeated for several properties both north and south of Long Thurlow Rd.
- ii) It goes on to assert that the existence of the settlement boundary was one objection raised against the householders recent planning applications to build beyond the settlement boundary. On this point I am rather confused. The Comment (from the Planning Consultant) asserts that there is currently no adopted settlement boundary, so it is hard to understand how this would have been taken into account in any planning application.
- iii) The householder then notes that in some previous draft version of the plan a change had been proposed to the settlement boundary to include Blackthorns (as noted earlier). The householder goes on to request that the change is expanded to ensure that all his property falls within the settlement boundary. Given the context you have to believe this is requested because he hopes it will remove one objection to any future planning applications for buildings in the garden of the property regardless of where they sit.
- iv) In the Comment, the response (from the planning consultant ?), asserts that settlement boundaries ideally should be "based on physical features on the ground", and then presumably by accepting a garden boundary as a physical feature, it (the request) "is considered acceptable to amendas requested".
- v) Actually the amendment then went beyond the requested change and re-aligned the settlement boundary to follow the garden line of both Cadogan House and the neighboring property Manor

House. The householder at Manor House was not consulted or informed of the change at the time. I believe they have only just become aware of the change.

vi) Now finally to my request; either leave the settlement boundary as it stood (excepting the reasonable amendment for Blackthorn), or be **consistent** and realign the settlement boundary for the properties to the south of Long Thurlow Road so it follows the garden boundaries there as well rather than cutting across their gardens, in fact the proposed line (identical to the previous line) is drawn very tightly around the built estate and doesn't even follow the field boundary/ fence line that historically separated garden from paddock.

2. Now looking again at Draft Badwell Ash & Long Thurlow NDP 2024 -2038: Section 14.4 p113 - 114 and Appendix D NDHA28 Thurlow House p145 I see that it is proposed to list my property Thurlow House as a non-designated heritage asset.

I have not been consulted or previously informed about this proposal.

I believe the information provided is incorrect. The property is NOT georgian. It was built originally, as you can determine from looking at old maps and census, around 1860 as a small farm cottage. For most of its life it was known as Thurlow Cottage as you can see from the census returns. At some time in the early 20th C it was extended, and it has progressively been extended and changed in more recent years.

The comment that it was "thought to have been used as a den of iniquity" so far as I am aware is simply a village myth, and unless someone actually has some hard historical evidence this is not something I want to see against my property in a public document.

Whilst Thurlow House is one of the older and large properties in Long Thurlow I do not believe it should be listed as a heritage asset.

3. Please ensure I am returned to your address list for any subsequent versions of these planning documents:

[MSDC note: Item 3 actioned and respondent notified]

[Ends]

(12) Resident - M

Rec'd: 23 April 2025

Subject: Response to revised draft Badwell Ash and Long Thurlow Neighbourhood Plan 2024-2038, your ref: BALT NP Reg 16 Consultation

Dear Sir/Madam

Please find attached my response to the revised draft of the BALT Neighbourhood Plan document.

A confirmation of receipt would be much appreciated. [MSDC note: Request actioned]

* * * *

Your ref: BALT NP Reg 16 Consultation.

Dear Sirs, please find below my comments regarding the revised draft of the 'Badwell Ash and Long Thurlow Neighbourhood Plan 2024-2028', submission draft February 2025.

My comments refer to the Neighbourhood Plan Settlement Boundaries section, point 7.23.

I note that the request to a change to the settlement boundary, was submitted as part of the Badwell Ash and Long Thurlow Neighbourhood Plan Consultation Statement process. General Comments section, ref 29, page 125, with wording such as "I request that Diagram 34 be amended to extend the settlement boundary to (extend to) my property boundary".

This section states that "There has not been a settlement boundary applied to Long Thurlow in any previous local plans." I disagree with this on a number of counts.

Planning inspector I A Dyer commented on Appeal decision APP/W3520/W/18/3217433, when referring to this particular plot of land, that "There is no disagreement between the parties that the proposal lies outside any of the settlements identified within Policy CS1 of the Mid Suffolk District Core Strategy -2008- (the Core Strategy) as being preferred locations for development with access to services and more sustainable modes of transport. Appeal Decision APP/W3520/W/18/3217433. Outside of the identified settlements the land is classified as countryside. The appeal site therefore falls within designated countryside".

I would also refer to previous statements from Mid Suffolk Planning Department, such as by Philip Isbel, the then Chief Planning Officer, in the Refusal of Planning Permission document, ref. DC/20/03350, whilst referring to the piece of land in question, "The proposed dwelling is located in the countryside outside of any settlement boundary as designated in the current development plan"

The Mid-Suffolk Settlement Maps document 'Joint Local Plan November 2020', also clearly shows what we know as the current settlement boundary.

This boundary was also very clearly identified to us when we visited the Planning Department's office, on first moving into our current property in 1998, our property is the other property being effected by this proposed change. It was made very clear at the time by the planning officer that the settlement boundary was clear and that under no circumstances would any development be allowed beyond this boundary.

I also note that the map on page 54, figure 32 of the revised Neighbourhood Plan, is identified as 'Revised Settlement Boundary for Long Thurlow', revised suggests from an existing.

All in all, the understanding that a settlement boundary currently exists would appear to have been accepted by everyone, including the Planning department and inspector of planning, in all practical purposes.

My question now would be, is it an appropriate use of this neighbourhood planning exercise, run by the local Parish Council, specifically in the case of this change request, in order to possibly improve the chances of the requestor of this change, who is themselves a parish councilor, to obtain planning permission which has to-date repeatedly been refused. This could very easily be interpreted as a very good example of cronyism and a clear conflict of interest within the parish council. I would like to think that this is unintentional and would be redressed appropriately.

I note from the very thorough Neighbourhood Plan and Consultation document that a number of key points were highlighted as substantial reasons why people enjoy living in our particular area, and the importance of ensuring that efforts are made to keep these things appropriately as they are, or indeed improve and enhance, including appreciation of the wildlife around us and the need to preserve the wildlife habitats. Also, the need to keep our countryside views and rural perspective, which many find calming and restful. Additionally keeping the current dark skies around us and the need to keep light pollution to the minimum was highlighted by many. In the event that this settlement boundary change is allowed, it puts at risk all of these issues of importance identified, with some already negatively impacted with work done to-date outside of planning authority and others likely to be, in the event that the change is permitted. It would appear in this instance, that this parish councilor is flying in the face of the overwhelming opinion of those living in the parish, in order to further their own objectives. Replacing countryside and wildlife habitat with an urban car park and industrial warehouse with substantial areas of driveway, hard-standing and associated lighting, is not the appropriate way to go. Altering the settlement boundary in the way proposed may help facilitate this, and as such is not acceptable.

My request is that the proposed settlement boundary change, as requested by my neighbour, is rejected and we retain what currently exists, on the land at the top of the property of both Manor House and Cadogan House. I note that in the suggested response from the Steering Group it is identified that "Settlement boundaries should, where possible, be based on physical features on the ground". This indeed was exactly the case, as it followed a well-established hedge and associated field gate, which the current occupier has now grubbed out and removed so no longer exists. It would make more sense to request that this hedge and associated field gate, that previously clearly identified the settlement boundary, was re-established, and in this way help preserve the environment, that we can see from multiple comments to the consultancy, are important to many in the parish and as identified 'issues of importance' of the Neighbourhood Plan.

There is a case involving enforcement called *Ardagh Glass v Chester City Council* [2009] EWHC 745 (Admin) where the Court said that it would be a betrayal by local authorities if their responsibilities were a development constructed without planning permission to achieve immunity because enforcement action was not taken in time. By analogy it would be a betrayal by this local authority to agree to extend the settlement boundary in circumstances where there has already been 3 successful judicial review challenges to attempts to gain planning permission on the land that is now sought to be included in the settlement boundary with a fourth challenge set to be heard in the High Court in late June/early July.

Further it would be unconscionable to permit this change from a landowner with a clear conflict of interest who has sought to engineer a physical change in the settlement boundary to his benefit to profit from such actions. Indeed any change to the policy could result in a challenge to the Neighbourhood Plan.

Yours faithfully.

[Ends]

(13) Resident - P

Rec'd: 25 March 2025

Subject: Settlement Boundary proposed for Long Thurlow, IP31 3JA

Dear Sir or Madam

We are the homeowners at The Firs, Long Thurlow, [REDACTED] and we have been looking at the contents of the proposed settlement boundary for Long Thurlow (Draft Badwell Ash & Long Thurlow NDP 2024 -2038 : Section 7.23 p 53 - 54 : Proposed Settlement Boundary).

If we have understood correctly, you are proposing a change to the settlement boundary to the north of Long Thurlow, to include the boundary up to the physical hedgerow of the gardens instead of the boundary cutting across the garden.

If this is likely to be the case, we think it is only right and proper that you are consistent and fair to all residents of Long Thurlow (both north and south) thus avoiding any unfair preference, and allow the boundaries to follow the course of the natural boundary hedgeline.

We would welcome your response. Please keep us informed of the ongoing consultation process on the email above.

Regards,

.....

MSDC Note: Given the content of the last paragraph above, Mid Suffolk District Council sent the following reply on 28 March 2025:

Dear

Thank you for your representation on the Badwell Ash & Long Thurlow NDP. I have added your details to our consultee list as requested. If you would like us to remove those at any time, do please let us know.

Please also note that, while Mid Suffolk District Council are running this consultation exercise, it is your Parish Council who have put forward this draft plan with its proposed settlement boundaries. All duly made representations received by us (yours included) will be forwarded to an independent examiner at the end of the consultation period, and it will be for them to decide what modifications need to be made to this draft plan in order for it to meet the relevant tests before it can then proceed to a local referendum.

Yours sincerely,

[Ends]

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(14) Resident - R

Rec'd: 24 March 2025

Subject: BALT NP Reg 16 Consultation - Settlement boundary query

Attached: JPG file [reproduced below]

Dear Sir/Madam

I write to you in relation to Badwell Ash & Long Thurlow NDP 2024 -2038 : Section 7.23 p 53 - 54 : Proposed Settlement Boundary

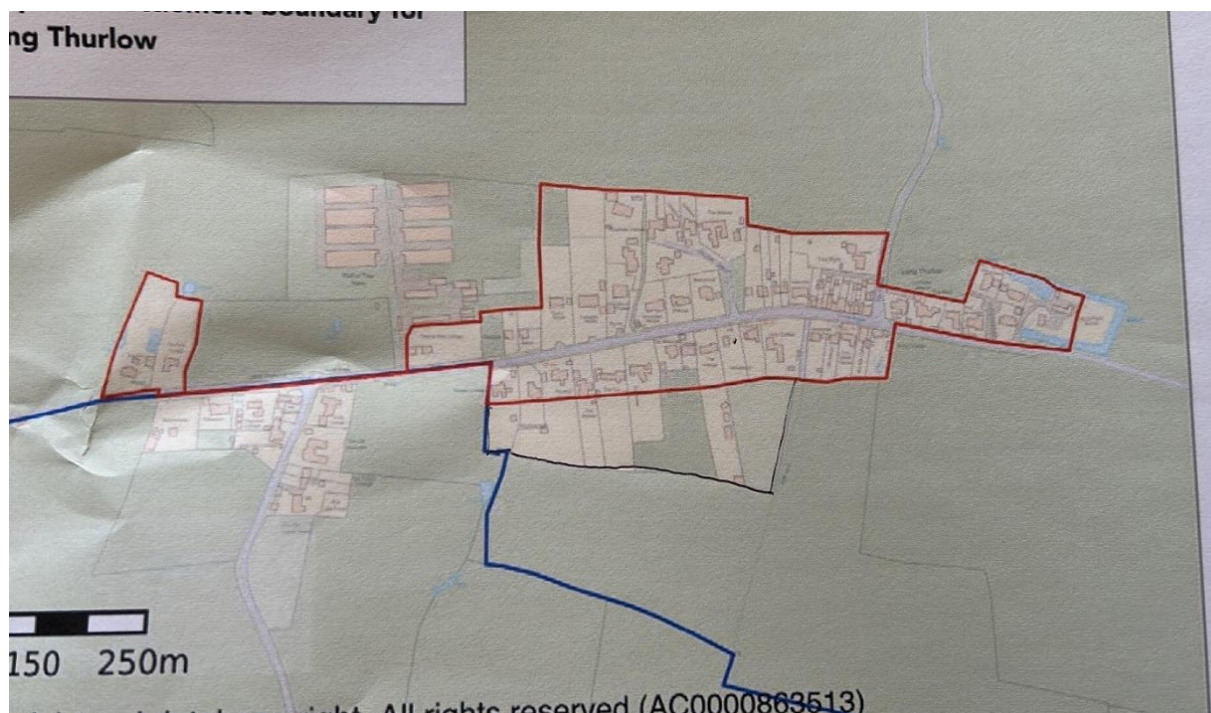
I note that a new settlement boundary is being proposed.

A planning consultants commented that settlement boundaries should be based on physical features on the ground, and then presumably by accepting a garden boundary as a physical feature, it (the request) "is considered acceptable to amendas requested this should be considered elsewhere.

I totally agree with this comment and am confused why Cadogen House has had the issues it has. But I also think if the document is moving from present to future and righting wrongs- consistency needs to be addressed.

I suggest a realignment of the settlement boundary for the properties to the south of Long Thurlow Road so it follows the garden boundaries there as well rather than cutting across all our gardens. I have attached your visual with my proposed line I have drawn. In fact my garden is shaded light green which indicates farmland which of course it isn't- it is very much part of my garden.

We look forward to your comments



MSDC Note: Given the content of the last paragraph above, Mid Suffolk District Council sent the following reply on 28 March 2025:

Dear

As requested, please accept this reply as confirmation of safe receipt of your email dated 24 March, together with its attached image file.

While Mid Suffolk District Council are running this consultation exercise, please note that we will not be commenting on individual representations. Instead, these and draft Badwell Ash & Long Thurlow Neighbourhood Plan will be passed over to an independent examiner, and it will be for them to determine what modifications need to be made to this draft plan if it is to meet the relevant tests and then proceed to a local referendum.

Yours sincerely,

[Ends]

(15) Resident - T

Rec'd: 23 April 2025

Subject: Badwell Ash long Thurlow NDP 2024-38 Response

Please accept this email as my comments regarding part of the NDP.

In particular section 7.23 p 53-54 Proposed settlement Boundary.

I have recently inherited [REDACTED] house in Long Thurlow.

It is on the south side of the street. We have always understood that the settlement line I just beyond the existing building. This was made clearly apparent when surveys and valuations were done when probate was going through. My [REDACTED] was adamant about this and always commented about development proposals. So I am somewhat confused that you now say that this boundary does not exist? Why is this?

However I see that on the north side, things are changing. Perhaps due to residents consistency regarding planning proposals.

While we have no immediate desire to develop our land, once the word gets out, I'm sure there will be developers knocking on the door, offering large amounts of money for this potential money making scheme.

Is this what you want for Long Thurlow. It's not what we want.

On another note. Along the west boundary of our land in the adjacent garden there are various wooden buildings. From neighbours I understand that there was a lot of opposition against the lodge that stands there. It appears that this dwelling, lived in by the parents-in-laws of the house owner, is a permanent dwelling and not a caravan. We understand it was allowed as being considered a caravan under the caravan act.

Can you put some clarity on this.

Thanks

[Ends]

(16) BADWELL ASH PARISH COUNCIL

Badwell Ash and Long Thurlow Neighbourhood Plan

Response of the Qualifying Body to the Regulation 16 Responses

Resp.	Summary:	BALT NPSG Response
Suffolk County Council	<i>Archaeology</i>	It is not considered to be a Basic Condition matter as the inclusion of this text is not required to fulfil this test and the Neighbourhood Plan should not repeat either national or Local Plan policy. However if the Examiner believes that the inclusion of the text is necessary it could be included as a note in the supporting text.
	<i>Local Green Spaces</i>	(See also Anglian Water). Should this proposed LGS remain in the plan the site area can be converted to hectares for consistency with other spaces (0.002 ha).
	<i>Public Rights of Way</i>	The proposed SCC text would be better placed to be included as a note rather than in the policy.
	<i>General</i>	Noted. The proposed amendments were accepted in any event.
Mid Suffolk District Council	<i>Joint Local Plan</i>	No objections to inclusion of updated text as proposed.
	<i>Design Guidance and Codes</i>	No objection to the proposed changes
	<i>Chapter 1</i>	No objection to proposed change
	<i>Chapter 7</i>	No objection to proposed changes. The clarification text around the settlement boundary for Long Thurlow is helpful.
	<i>Housing Mix</i>	The paragraphs in question are describing the content of the HNA. The content of which was produced at a specific point in time and which will not change. The note was added to aid readers subsequent to the publication of NPPF 2024. The preference would be for the note to remain and for the HNA content as described to also remain.
	<i>Chapter 11</i>	Comments noted. The reference to 'testing' is in relation to validation by desk top modelling not by POE.
	<i>Non Designated heritage Assets</i>	Rumbles Fish Bar – There is some additional local knowledge on this matter which may be helpful. The Fish Bar structure is at least 1920s, as the family who live opposite used to own it and they have confirmed this. The building was formerly the Forge, much of it remains although not all and there has been extensive alteration. Whilst the identification of the Fish Bar as a community facility will protect the use it does not protect the building/structure.

		<p>Cornish Cottages – Comments noted for review.</p> <p>Moat House – Comments noted, there was some confusion with this and Moat Farmhouse at Long Thurlow which is a listed building and therefore does not need to be identified as NDHA. HE Ref: 1032213. Comments noted for any review.</p>
	<i>Chapter 14</i>	No objection to proposed minor modifications
Natural England	<i>No comments</i>	Noted.
Environment Agency	<i>General Comments</i>	Noted. Policies BALT19 (Flood risk and mitigation), BALT14 (Biodiversity) and BALT 15 (Low carbon and eco design including Zero Carbon) already address a number of these issues raised.
Dedham Vale Society	<i>Out of area</i>	Noted
Anglian Water	<i>Design Guidance and Codes</i>	No objection to proposed amendments. Examiner and MSDC to note that changes to AECOM documents are subject to the contractual arrangements between MHCLG/Locality and AECOM.
	<i>BALT8 - Infrastructure</i>	Welcome. No objection to proposed addition to supporting text.
	<i>BALT14- Biodiversity</i>	No objection to inclusion of text relating to LNRS
	<i>BALT24 – Local Green Space</i>	The comments made by the owners are noted, however the view remains that this is an important space in Long Thurlow and is the only publicly visible green space in Long Thurlow. It is not the intention to fetter the discretion of the owners to maintain their asset located to the rear.
National Highways	<i>General/ Support</i>	Noted.
Sport England	<i>General Guidance</i>	Noted.
Defence Infrastructure Organisation (for MOD)	<i>General Guidance (Safeguarding and Wind turbines)</i>	Noted.
Resident B	<i>Existence of a Settlement Boundary for Long Thurlow</i>	<p>See also MSDC response.</p> <p>It is understandable why there has been some confusion about the existence of a settlement boundary in Long Thurlow. To clarify the point (as reinforced by the MSDC response), there has been no settlement boundary in force in Long Thurlow. The confusion relate to the publication of the November 2020 draft version of the Babergh- Mid Suffolk Local Plan which identified a</p>

		<p>proposed settlement boundary for Long Thurlow. This proposal was not taken forward and was essentially cast aside when the decision to split the Joint Local Plan into two parts was made in December 2021. It appears some local residents have a recollection of the original proposal but were not aware of the subsequent decisions around the Joint Local Plan.</p> <p>Therefore to clarify the matter, there is no current settlement boundary in force for Long Thurlow. The previous refusals which refer to settlement boundaries are in the context of refusal for the proposed development being outside of 'any' settlement boundary which would have been the case. Para 7.23 is correct and the proposed settlement boundary in the Neighbourhood Plan is not at variance with the existing because there is no 'existing settlement boundary'. The concerns voiced about the planning history of Long Thurlow are based on the erroneous assumption that there is an existing settlement boundary for Long Thurlow.</p>
	<i>Delineation of the proposed settlement boundary for Long Thurlow</i>	<p>The Pre-Submission Consultation draft of the BALT Neighbourhood Plan included a proposed settlement boundary for Long Thurlow. This consultation was widely publicised including a flyer delivered to every household (see Appendix 6 of the Consultation Statement) and public exhibitions in the village hall on 28th and 30th September 2024.</p> <p>A duly made representation was received during the consultation period, which requested to amend the draft settlement boundary as proposed in the Pre-Submission Version of the Neighbourhood Plan.(See consultation statement representations 29 and 55). This was considered by the Steering Group and it was considered that this would not be detrimental to the form, character and setting of this part of Long Thurlow as there was already some development to the rear of the properties on the north side fronting the main road. The boundary was therefore amended to that shown in the Submitted Neighbourhood Plan.</p>
Resident K	<i>Existence of a Settlement Boundary for Long Thurlow</i>	<p>See response to Resident B above.</p> <p>The document link included in the representation by resident K is that of the November 2020 Joint Local Plan which did not proceed as proposed.</p>
	<i>Delineation of the proposed settlement boundary for Long Thurlow</i>	<p>The Neighbourhood Plan is able to propose or amend settlement boundaries as is the case here.</p> <p>As stated above the form and character of properties north of Long Thurlow Road is different to that of the built form to the south of Long Thurlow Road. The built form to the north includes residential development</p>

		<p>behind properties fronting the main road with an access from the main road e.g. Willow Drive. To the south , the properties are in a strong linear form and largely single plot depth. The proposed settlement boundary to the south of Long Thurlow Road, (as shown in the submitted N'hood Plan) follows features on the ground to the east but due to the variation in plot depth further to the west the line bisects rear gardens. To realign the boundary to follow the line of the rear gardens would include a significantly larger area of land which would not be suitable for development as it would result in backland development behind a strong linear form, altering the character of the area.</p>
	<p><i>NDHA28 – Thurlow House</i></p>	<p>This proposed NDHA was included in the Pre-Submission Consultation draft of the Neighbourhood Plan . All property owners received a hand delivered letter explaining what a Non Designated Heritage Asset is (along with the flyers between 20-21st September 2024). See Appendix A for copy of the letter sent to residents. Representations 343, 344 and 351 in relation to other proposed NDHAs, as shown in the Consultation Statement all make reference to the letter.</p> <p>Resident K refers to the property as one of the oldest in Long Thurlow and that is one of the principle reasons for it being identified as a proposed NDHA in the Neighbourhood Plan.</p>
Resident M	<p><i>Existence of a Settlement Boundary for Long Thurlow</i></p>	<p>See response to Resident B above in respect of the existence of a settlement boundary.</p>
	<p><i>Delineation of the proposed settlement boundary for Long Thurlow</i></p>	<p>See response to Resident B above in relation to the delineation of the settlement boundary.</p> <p>It should be noted that the Parish Councillor referred to is not a member of the Neighbourhood Plan Steering Group and has never attended any Steering Group Meetings</p>
Resident P	<p><i>Delineation of the proposed settlement boundary for Long Thurlow</i></p>	<p>The purpose of a settlement boundary is to delineate where new development is and is not acceptable.</p> <p>As stated above the form and character of properties north of Long Thurlow Road is different to that of the built form to the south of Long Thurlow Road. The built form to the north includes residential development behind properties fronting the main road and has access from the main road e.g. Willow Drive. To the south, the properties are in a strong linear form largely single plot depth. The proposed settlement boundary south of Long Thurlow Road (as shown in the submitted N'hood Plan) follows features on the ground to the east but due to the variation in plot depth further to the west the line bisects</p>

		rear gardens. To realign the boundary to follow the line of the rear gardens would include a significantly larger area of land which would not be suitable for development as it would result in backland development behind a strong linear form, altering the character of the area.
Resident R	<i>Existence of a Settlement Boundary for Long Thurlow and delineation of the proposed settlement boundary for Long Thurlow</i>	<p>See response to Resident B in respect of the existence of a settlement boundary in Long Thurlow.</p> <p>As stated above the form and character of properties north of Long Thurlow Road is different to that of the built form to the south of Long Thurlow Road. The built form to the north includes residential development behind properties fronting the main road and access from the main road e.g. Willow Drive. To the south, the properties are in a strong linear form large single plot depth. The proposed settlement boundary to the south of Long Thurlow Road (as shown in the submitted N'hood Plan) follows features on the ground to the east but due to the variation in plot depth further to the west the line bisects rear gardens. To realign the boundary to follow the line of the rear gardens would include a significantly larger area of land which would not be suitable for development as it would result in backland development behind a strong linear form, altering the character of the area. The amendment to the settlement boundary a proposed by Resident R is therefore not considered appropriate as further development in this location would adversely affect the form and character of this part of Long Thurlow.</p>
Resident T	<i>Existence of a Settlement Boundary for Long Thurlow</i>	See response to Resident B above in respect of the existence of a settlement boundary in Long Thurlow.
	<i>Potential Planning Enforcement Matter</i>	If there is a breach of planning in the location described, the matter should be passed to the relevant MSDC officers to investigate.

Badwell Ash and Long Thurlow Neighbourhood Plan

Consultation: 27th September to 8th November 2024

Drop-in sessions at the Village Hall on:

28th September: 10am to 2pm, and 30th September: 4pm to 8pm

Dear Property Owner,

Non-designated Heritage Assets

This letter is to advise you that the draft Badwell Ash and Long Thurlow Neighbourhood Plan will shortly be published for public consultation on **27th September 2024** with a six-week public consultation period lasting until **8th November 2024**. We will be also holding exhibitions in the village hall, on the **28th and 30th of September**.

The Neighbourhood Plan is being prepared on behalf of Badwell Ash and Long Thurlow Parish Council. It is a planning policy document which will guide future development in the area. More information can be found here:

<https://badwellash.suffolk.cloud/neighbourhood-plan/>

We are writing to you because a building or area of land you own/have an interest in, has been suggested for inclusion in the Neighbourhood Plan as a Non-designated Heritage Asset (Important Unlisted Building).

A Non-designated Heritage Asset is a building, structure or area of land that is locally important to the community because of its age, rarity, aesthetic interest, group value, historic association, landscape interest, landmark status or social/communal value. These do not have the same protection or restrictions as those on the national list of Listed Buildings.

If a building is identified as a Non-designated Heritage Asset, it does not mean that it cannot be altered or amended in anyway nor does it mean that there are additional regulations or consents required to undertake any works to it. It simply means that any proposals that already require the benefit of planning permission that may affect your property should take your land or building's architectural or historic significance into account. We are keen to include Non-designated Heritage Assets in the Neighbourhood Plan, to ensure that that some of the important characteristics of Badwell Ash and Long Thurlow are recognised.

The draft list and maps of possible Non-designated Heritage Assets for Badwell Ash, Badwell Green and Long Thurlow are as follows:

Badwell Ash		
1. Rumbles Fish Bar	2. Street Farmhouse	3. Cavell Cottage
4. Village shop and Post Office	5. Nos 1-5 The Street	6. Parkers Farmhouse
7. Church House	8. Myrtle Cottage	9. Harvey House
10. Church Cottage	11. Norwich House	12. Wye Cottage
13. Little Thatch	14. The Karlsbond	15. Driftway Farm
16. The Old Vicarage	17. Mill Cottage, Hunston Road	18. Shackerland Hall
19. Richer Road Cemetery	20. The Old School House	21. The War Memorial
22. Corner Cottage	23. Parkers Cottage	24. Cornish Cottages
25. WWII Nissen Hut		

Badwell Green		
26. The Moat at Manor House	27. Dairy Farm Barn	28. Hayloft at Diary Farm
29. Pattles Barn		

Long Thurlow		
30. 1-10 Rainbow Cottages	31. Thurlow House	32. Corner Cottage
33. Rowan Cottage,	34. Wash House	35. Tiptofts Cottages

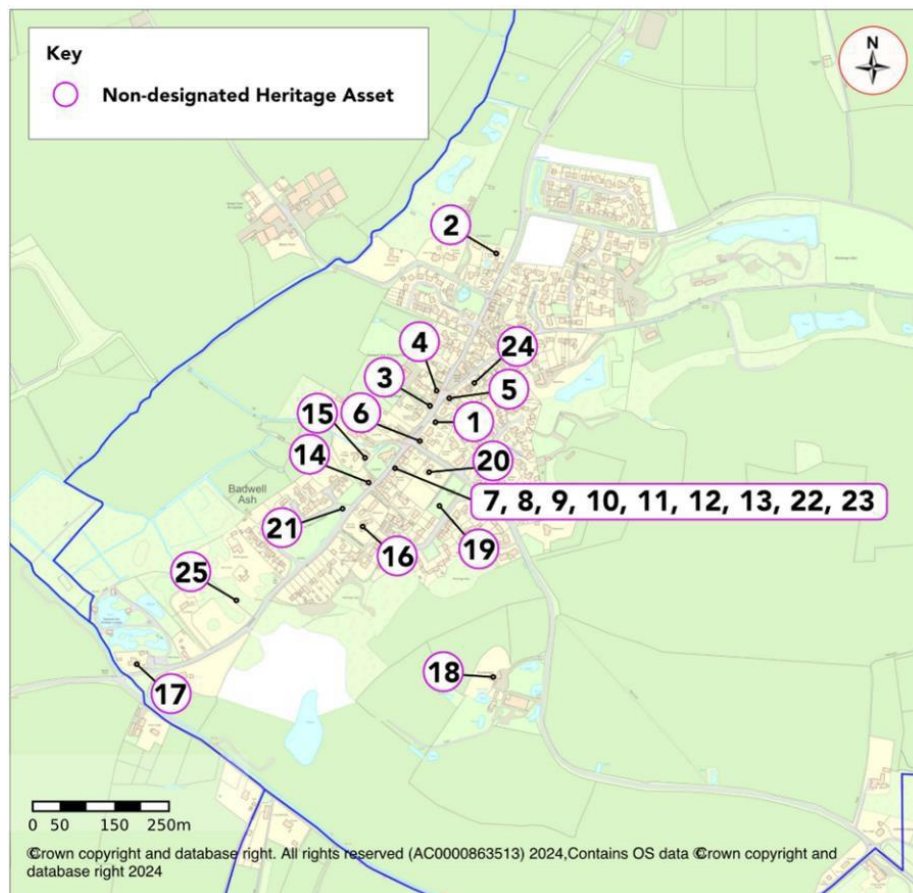
The list of Non-designated Heritage Assets is in draft at present. We are seeking your views as to whether you think your building/land should be included in the final version of the Badwell Ash and Long Thurlow Neighbourhood Plan and whether the information in **Appendix D** of the draft Plan is correct. We would be grateful therefore if you could email: badwellashplan@gmail.com by the closing date of the consultation, which is midnight on **8th November 2024** with your views. If you have any questions, please contact us before this date.

Thank you.

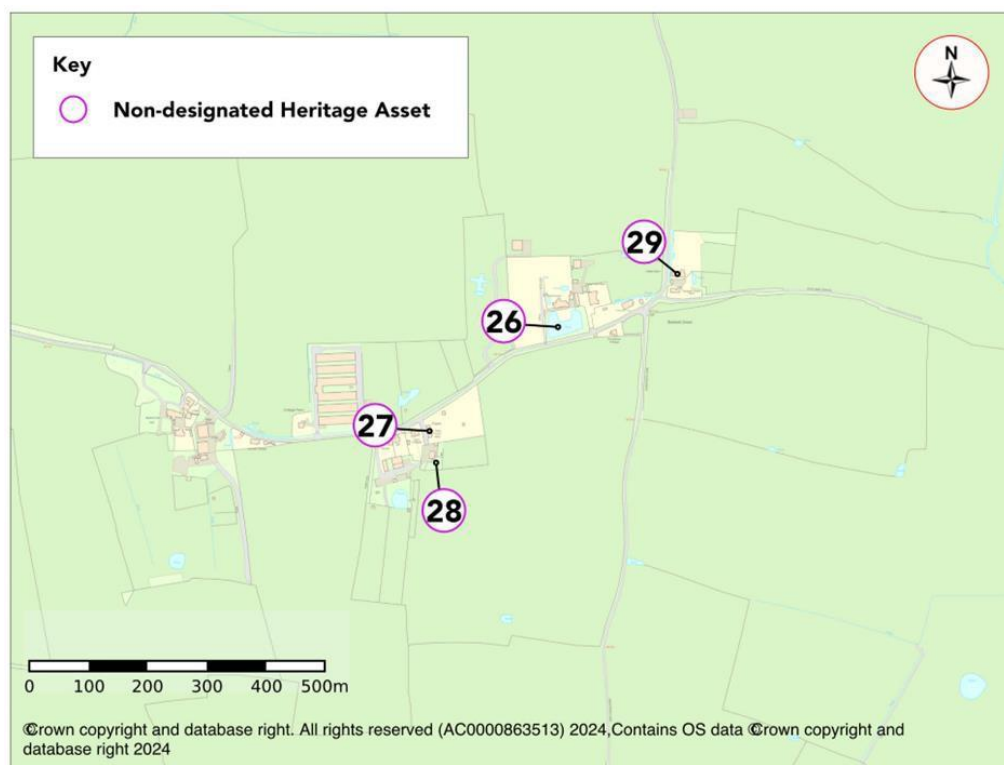
Yours faithfully,

Badwell Ash and Long Thurlow Neighbourhood Plan Steering Group

Map of Proposed Non-Designated Heritage Assets: Badwell Ash



Badwell Green



Long Thurlow

