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Subject: HARTEST NEIGHBOURHOOD PLAN - BABERGH DC COMMENTS
Date: 18 May 2017 at 12:16
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PM

Nick

I am responding to the Pre-Submission Consultation on the Hartest Neighbourhood Plan on behalf of Babergh District Council.

Generally I consider the Plan to be well written and is clearly the product of a significant amount of work by the local community. I have four substantive comments and a number of minor comments. These are set out below.

Substantive Comments

1. The dates shown in the latter stages of the timetable on page 9 of the Plan are unrealistic and cannot be achieved given the lead in times for consultation on the submitted plan, the examination and the referendum. I would suggest that it be amended as follows:

Consult on Plan – April/May 2017

Amend Plan and Submit to Babergh Council – Summer 2017

Final Consultation – Autumn 2017

Independent Examination and Adoption – Winter 2017/18

2. Definition of Clusters – pages 22, 23 24 and on Proposals Map

You may be aware that the Examiner for the Lawshall Neighbourhood Plan has raised a question on the definition of the clusters in the Lawshall NP which has adopted a similar approach to you. The Examiner has said:

“One of the issues I have identified is how easy or difficult it would be for a prospective developer to be able to identify the extent of each of the clusters with clarity and precision. Would it be useful for the clusters to be identified more precisely and if so, please could maps be prepared for each?”

The Examiner’s questions and the response to them can be seen on the Council’s website via the following link:

<http://www.babergh.gov.uk/assets/Neighbourhood-Planning/Lawshall-NP-Exam-Qstn-May17.pdf>

You may wish to consider how the clusters are defined in the light of these comments.

3. Special Landscape Area and the Proposed Extension

I am concerned about how the special landscape area is dealt with in the Plan and the justification for the proposed extension. Firstly, Government Guidance has encouraged a move away from blanket designations to a criteria based approach based on Landscape Character Areas. A decision on whether to retain special landscape areas in Babergh will be made as part of the preparation of the new Joint Local Plan for Babergh and Mid-Suffolk.

Secondly, I do not think that the evidence that has been produced is sufficiently robust to justify the proposed extension. Special Landscape Areas have their origin in the Suffolk Structure Plan. The Draft Alteration No.3 (May 1992) proposed:

“Special Landscape Areas will have the characteristics of one or more of the following

- a) River valleys which still possess traditional grazing meadows with their hedgerows, dykes and associated flora and fauna
- b) Areas of Breckland including remaining heathland and the characteristic lines and belts of Scots Pine
- c) Historic Parklands and Gardens; and
- d) Other areas of countryside where undulating topography and natural vegetation, particularly broadleaved woodland, combine to produce an area of special landscape quality and character”

The survey method adopted for the assessment of landscape was based on the Countryside Commission document – Landscape Assessment, the Countryside Commission Approach, which is now archived and superseded by advice on Landscape Character Assessment.

I think in order to justify an extension to the SLA more detailed evidence is required which may include surveys which map the features of the area and demonstrate how the topography and vegetation combine to produce an area of special landscape quality and character.

4. Proposals Map

The Proposals Map does not cover the whole parish or show all the proposals of the Plan. In particular it does not show the proposed extension of the SLA. I would suggest that the Proposals Map should be in two parts comprising a plan of the whole parish with an inset showing more detail for the main built-up area of the village. Also in the key the clusters are shown in blue and on the map in red.

Other Comments

Contents Page – Should say what Appendices 1 and 2 are

1.9 Is something missing at the end? Should be a full-stop.

2.2 Should be a full-stop at the end of the first sentence (After Glem)

4.1 (and other places) The formatting seems to have gone awry with no spaces between words.

6.3 Second bullet point – “d” missing at the end of woodland

7.7 The Strategic Housing Market Assessment which provides evidence on objectively assessed need is now available at:

<http://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/suffolk-coastal-local-plan-evidence-base/>

7.17 12th line – needs “which” between “and” and “would”

8.2 First bullet point, add “which are SSSIs”

9.2 Fifth bullet point Replace “of” with “in”

9.9 17th line. Delete “to”

Policy HAR 15 b Do you mean a landscape character appraisal? Did you have in mind a visual impact appraisal?

10.5 There seems to be something missing after “tourist accommodation”
Policy HAR 16 Needs to be more specific. What type of proposals? What type of harm?
11.8 Last line. Insert “is” between “use” and “ancillary”

I hope these comments are helpful. I am happy to do discuss them with you if necessary.

Regards

Paul Munson

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***** Community Infrastructure Levy (CIL) charging started in Mid Suffolk and Babergh on 11th April 2016. See our websites for the latest information here: [CIL in Babergh](#) and [CIL in Mid Suffolk](#) ******

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