

Hintlesham and Chattisham Neighbourhood Plan

Parish Council response to comments submitted at Regulation 16 Consultation Stage

Body	Parish Council response
Councillor Jane Caruthers, Babergh District Council The Councillor considers the Plan is well thought out, and the Parish Council have clearly consulted with the local community.	The Councillor was consulted but did not respond at the Regulation 14 consultation stage. Nothing further to add.
Suffolk County Council The County Council recommends that photographs of each Local Green Space site should be provided. The County Council puts forward a number of suggested changes to the Planning Policy context section of the Plan including inserting: <i>"While Babergh District Council is the local planning authority for most land use issues, Suffolk County Council is the statutory planning authority for minerals and waste development and safeguarding. Consideration should be given to the SMWLP 2020, which sets out policies for mineral extraction, safeguarding, and waste management and forms part of the statutory development plan for the area."</i> Further suggested amendments to paragraph 3.6 are also put forward. A new paragraph 3.7 is suggested, as follows:	Suffolk County Council commented at the Regulation 14 consultation stage. This is not necessary to meet the Basic Conditions and is not standard practice with the preparation of neighbourhood plans. Clear and detailed Ordnance Survey based maps are included in the Local Green Space Assessment and the boundaries are defined on the Policies Map to ensure there is no doubt as to the area covered. Paragraph 3.6 of the Plan already states that regard must be given to the policies and safeguarding requirements of the Minerals and Waste Local Plan when determining planning applications. It is not considered necessary to state who the planning authorities are in this section of the Plan. . The suggested amendments to paragraph 3.6 are not considered necessary in order to meet the Basic Conditions. This is not considered necessary in order to meet the Basic Conditions.

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<i>3.7 Part of the plan area is covered by the Minerals Consultation Area. Any proposed development within this area meeting the criteria would trigger Policy MP10: Safeguarding and Policy WP18: Safeguarding of Waste Management Sites of the Suffolk Minerals and Waste Local Plan (2020)."</i> The County Council reiterates the request to include a planning policy on public rights of way.	The Plan submitted for examination does not include such a policy and the Examiner only has to examine the Plan that is before her. There is no mechanism for an Examiner to include a new policy in the Plan at this stage.
Babergh District Council The District Council provides an update on their "call for sites" process and also makes a number of references to minor amendments and corrections to text that could be made. Policy H&C 6 - Biodiversity and Habitats (criterion c.): The District Council identifies that an agreed amendment has not been incorporated into the policy. Policy H&C 7 – Important Views The District Council queries whether View 19 should point west, as shown in the submitted Plan. etc., or point south, as described by the respondent? Policy H&C 8 – Local Green Space The District Council refers to the Parish Council response to the pre-submission comments concerning including areas of hard standing etc. within the designation. They clarify that the area used for car parking should be removed from the designation in LGS 1.	Babergh District Council commented at the Regulation 14 consultation stage. The Plan can be amended to address these minor amendments, in consultation with the District Council, at the Referendum stage without impacting the Basic Conditions. The Parish Council agrees that the addition of the words "and corridors" could be added to the end of the criterion should the Examiner consider it necessary. The Parish Council considers that the respondent made an error in their representation in that the view "south" of the church is into Timperleys and the housing in that road, whereas the significant view is looking west from the church along the A1071 to the listed gates of Hintlesham Hall. The Parish Council remains of the opinion that an area used as car parking can be designated as Local Green Space given the content of the Planning Practice Guidance Paragraph: 013 Reference ID: 37-013-20140306, which states "green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis."

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Historic England Historic England do not consider it necessary to provide detailed comments at this time.	Historic England commented at the pre-submission consultation. Nothing further to add
Natural England Natural England does not have any specific comments on this draft neighbourhood plan.	Natural England commented at the pre-submission consultation. Nothing further to add
Environment Agency The Environment Agency have no further detailed comments to make in relation to this plan.	The Environment Agency commented at the pre-submission consultation. Nothing further to add
National Highways National Highways have no specific comments to make on the draft policies or supporting documentation.	National Highways commented at the pre-submission consultation. Nothing further to add
Anglian Water Anglian Water support a number of specified policies. In respect of Policy H&C 11, Anglian Water recommends that the policy references the importance of appropriately designing and managing new culverts to avoid adverse impacts on our sewer network.	Anglian Water were consulted but did not comment at the pre-submission consultation. Nothing further to add. The Parish Council is content for the Examiner to determine whether this amendment is necessary in order for the policy to satisfy the Basic Conditions.
Water Management Alliance The Water Management Alliance have no further comments over and above their comments submitted at the pre-submission consultation stage.	The Water Management Alliance commented at the pre-submission consultation. Nothing further to add.

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Fisher German on behalf of National Grid Electricity Transmission (NGET) NGET do not raise any specific comments on the Neighbourhood Plan other than identifying assets in the Plan Area.	National Grid Electricity Transmission were consulted but did not comment at the pre-submission consultation. Nothing further to add.
Dedham Vale Society The Society does not make any comment.	Dedham Vale Society were consulted but did not comment at the pre-submission consultation. Nothing further to add.
Resident B The respondent identifies a number of comments which can be summarised as: 1: Policy H&C 1 does not conform with paragraph 11d) of the NPPF (December 2024) and does not give appropriate regard to national housing policies in both the NPPF and draft NPPF. It is considered that the approach in the Plan is not reasonable in order to meet (or consider) the interim housing numbers which Babergh have previously advised should be reasonably accommodated.	The response is anonymous and it is therefore not possible to determine whether the respondent commented at pre-submission stage. Paragraph 11d) of the NPPF applies to planning application decision making and invokes the "presumption in favour of sustainable development" where the policies are deemed out of date. A footnote to the paragraph explains that "out-of-date" for applications involving the provision of housing means "situations where: the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer as set out in paragraph 78); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years." Where such a situation exists, and it is the Parish Council's understanding that the District Council can demonstrate a five years' supply of housing land, paragraph 11d would not apply where: a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement. There is nothing in legislation or the NPPF that states that neighbourhood plans <u>must</u> make provision for housing and allocate sites. As the draft Neighbourhood Plan

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2: The Plan fails to deliver the strategic development needs, specifically the level of housing (and affordable housing) needed by the local community and the wider district. 3: The Plan does not facilitate delivery of new homes that Central Government and Babergh is seeking by being restrictive on	explains, the adopted Local Plan does not provide an indicative housing requirement for this or any other neighbourhood area in the district. It is acknowledged that Babergh District Council published a "Briefing Pack" for parish councils in March 2025 explaining that a new Joint Local Plan was to be prepared. The Briefing Pack used a formula to distribute projected housing growth across the district based on the current housing stock and applying a proportionate rather than sustainable distribution across the district reflecting the percentage growth that Babergh was expected to plan for. It did not reflect a settlement hierarchy and agreed distribution of growth that would be determined through the preparation of a Local Plan. As such, the figures contained in the Briefing Pack for parishes has not been tested through local plan preparation and examination and therefore cannot be relied upon. For this reason, and given that there is no requirement for neighbourhood plans to include provision for housing, the decision was taken not to allocate sites for housing in the Neighbourhood Plan until there is more certainty as to the requirement which has been tested through the Local Plan preparation process. Information recently received confirms that the Draft Local Plan will not be consulted upon until 2027 in respect of the call for sites locations and early 2028 for the Draft Local Plan, prior to adoption in 2029. As a result, the timescale for our NP review and a new Housing Chapter is now clear and as a result, we will be consulting on possible housing locations late 2026/early 2027. This matter is addressed above. Policy H&C 1 reflects strategic policy SP03 of the Joint Local Plan Part 1. That policy specifies the exceptions where development

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the location of new development and not considering impact on wider services. This is beyond the level of restriction placed by other villages in Babergh where neighbourhood plans have been recently adopted, such as Hartest and Tattingstone. The current draft supports less housing than would be supported by Central Government and Babergh District Council and conflicts with para 11 a) b) c) and d) of the NPPF.	outside defined Settlement Boundaries would be supported. That approach is the same as taken in the Hartest, Tattingstone and many other recent neighbourhood plans across the district. Paragraph 6.4 of the Plan states "The Parish Council acknowledges that Hintlesham and Chattisham could be required to play its part in accommodating an element of the housing growth which is likely to have to be located on sites outside the Settlement Boundaries defined in this Plan. The identification of such sites will take place through the Local Plan preparation process or as a result of an early review of the Neighbourhood Plan." Central government does not specify the amount of housing required for Hintlesham and Chattisham and the District Council has yet to determine its strategy for the distribution of housing growth in the Local Plan.
Resident T The respondent identifies a number of concerns concerning the need for housing. It is stated that the plan ignores the realities of a growing population. The Neighbourhood Plan does not reflect the Government's proposal for more housing. There will be a need for more recreational facilities and services.	The response is anonymous and it is therefore not possible to determine whether the respondent commented at pre-submission stage. As the draft Neighbourhood Plan explains, the adopted Local Plan does not provide an indicative housing requirement for this or any other neighbourhood area in the district. Paragraph 6.4 of the Plan states "The Parish Council acknowledges that Hintlesham and Chattisham could be required to play its part in accommodating an element of the housing growth which is likely to have to be located on sites outside the Settlement Boundaries defined in this Plan. The identification of such sites will take place through the Local Plan preparation process or as a result of an early review of the Neighbourhood Plan." Information recently received confirms that the Draft Local Plan will not be consulted upon until 2027 in respect of the call for sites locations and early 2028 for the Draft Local Plan, prior to adoption in 2029. As a result, the timescale for our NP review and a new Housing Chapter is now clear and as a

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The draft Plan does not contribute to the achievement of sustainable development and proposes less housing by means of development than if the neighbourhood plan were not made.	result, we will be consulting on possible housing locations late 2026/early 2027. Once the housing growth requirements have been determined through the preparation of the new Local Plan, a view can be taken about the amount, location and deliverability of any additional services and facilities that would be required in the parish. The current adopted Local Plan does not specify a housing requirement for the parish but states that new housing would only be supported within the Settlement Boundaries. (Policy SP03).
Suffolk Wildlife Trust The Trust suggests that the plan could be strengthened with the inclusion of a map showing areas of biodiversity value, including those adjacent to the plan area. It is noted in National Planning Policy Framework (Para.192) that plans should map components of local wildlife-rich habitats and wider ecological networks. The Suffolk Local Nature Recovery Strategy is referred to in the Natural Environment chapter, however the plan should highlight that areas of principle importance for biodiversity (APIB) and areas that could become important for biodiversity (ACB) are present within the parish.	Suffolk Wildlife Trust commented at the pre-submission consultation. This is not considered necessary given that this information is maintained and published on the Local Nature Recovery Strategy site. This is not considered necessary given that this information is maintained and published on the Local Nature Recovery Strategy site.