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1 Introduction

- 1.1 As part of the formal submission of the Copdock and Washbrook Neighbourhood Plan for Examination, there is a requirement for the Parish Council, as the 'qualifying body' to illustrate that they have complied with a series of 'basic conditions' as set out in the Town & Country Planning Act 1990 (as amended). This Statement accompanies the submission to the local planning authority, Babergh District Council, of the Copdock and Washbrook Neighbourhood Plan under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 ("the Regulations"). Regulation 15 requires a submission neighbourhood development plan to be accompanied by "a statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8(2) of Schedule 4B to the 1990 Act".
- 1.2 This statement has been prepared in order to confirm compliance with these basic conditions as follows:

Section 2 identifies the legislative requirements for the 'basic conditions'

Section 3 identifies how the Plan Objectives and Policies are in general conformity with the National Planning Policy Framework and the Strategic Policies of the adopted Local Plan.

Sections 4 confirms that the neighbourhood plan is compatible with the Convention Rights.

It is considered that the Neighbourhood Plan complies with the requirements of the basic conditions as set out in Paragraph 8(1)(a) of Schedule 4B of the Act.

2. Legal Requirements

- 2.1 Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended) identifies the "Basic Conditions" that the neighbourhood plan must comply with.
- 2.2 Paragraph 8 (1) states that the examiner must consider:
 - (a) whether the draft neighbourhood development plan meets the basic conditions (see sub-paragraph (2)),
 - (b) whether the draft neighbourhood development plan complies with the provision made by or under sections 38A and 38B of this Act,
 - (d) whether the area for any referendum should extend beyond the neighbourhood area to which the draft neighbourhood development plan relates, and
 - (e) such other matters as may be prescribed.
- 2.3 Paragraph 8 (2) states that a draft neighbourhood development plan meets the basic conditions if:
 - (a) having regard to national policies and advice contained in guidance by the Secretary of State, it is appropriate to make the neighbourhood development plan,
 - (d) the making of the neighbourhood development plan contributes to the achievement of sustainable development,
 - (e) the making of the neighbourhood development 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),
 - (f) the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations, and
 - (g) prescribed conditions are met in relation to the neighbourhood development plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood development plan.

The requirements of Paragraph 8(2(b), (2)(c) (3), (4) and (5) are not of relevance to the compliance with the basic conditions test.

- 2.4 Paragraph 8 (6) stipulates that the examiner is not to consider any matter that does not fall within subparagraph (1) apart from considering whether the draft neighbourhood plan is compatible with the Convention rights.
- 2.5 On 28 December 2018 the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 came into force. Amongst other things, these Regulations amend the basic condition prescribed in Regulation 32 and Schedule 2 (Habitats) of the Neighbourhood Planning (General) Regulations 2012 (as amended) which stated:
 - The making of the neighbourhood plan is not likely to have a significant effect on a European site or a European offshore marine site either alone or in combination with other plans or projects.

The Regulations substitute this with a new basic condition which states:

• The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

Meeting the Legal Requirements

Compliance with the individual elements of the legal requirements is set out below.

Requirement	Interpretation	NP response
4B 8 (1)(a) Whether the Draft NP meets the Basic Conditions	This requires the NP to demonstrate compliance with paragraph 8(2) of Schedule 4B of the T&CP Act.	This is considered in detail in later sections of this Statement.
4B 8 (1)(b) Whether the Draft Order Complies with Sections 38A & 38B of the Compulsory Purchase Act 2004	This requires the draft order to comply with Sections 38A & 38B of the Compulsory Purchase Act 2004. Section 38A sets out the "Meaning of Neighbourhood Development Plan".	Compliance with Sections 38A and 38B is demonstrated in the following rows.
	Section 38A(1) "any qualifying body is entitled to initiate a process for the purpose of requiring a Local Planning Authority in England to make a Neighbourhood Development Plan."	The Neighbourhood Plan has been submitted by Copdock and Washbroojk Parish Council, a qualifying body (as defined in the Localism Act 2011).
	Section 38A(2) A "Neighbourhood Development Plan is a plan which sets out policies (however expressed) in relation to the development and use of land in the whole or any part of a particular neighbourhood area specified in the plan."	The NP sets out Policies that relate to the development and use of land for the Neighbourhood Area covering the Parish of Copdock and Washbrook, as designated by Babergh District Council on 28 September 2018. The boundary of the Neighbourhood Area is shown in the NP.
	Section 38A, Paragraphs (3) - (12)	These paragraphs are not of relevance to the submission phase of the NP.
	Section 38B1(a) The Neighbourhood Development Plan "Must specify the period for which it is to have effect."	The plan period of the NP is from 2016 to 2037.
	Section 38B1(b) A Neighbourhood Development Plan "may not include provision about development that is excluded development."	The NP does not contain policies relating to excluded development as defined in Section 61K of the Planning and Compulsory Purchase Act 2004
	Section 38B1(c) A Neighbourhood Development Plan may not relate to more than one neighbourhood area	The NP does not relate to more than one neighbourhood area. It solely relates to the Neighbourhood Plan Area as designated by Babergh District Council on 28 September 2018.
	Section 38B(2) Only one Neighbourhood Development Plan may be made for each neighbourhood area.	There are currently no other NP's in place in this neighbourhood area.
	Section 38B(3) If to any extent a policy set out in a Neighbourhood Development Plan conflicts with any other statement or information in the plan, the conflict must be resolved in favour of the policy.	There are no conflicts within the NP

Requirement	Interpretation	NP response
	Section 38B(4)(a) Regulations made by the Secretary of State may make provisions for "restricting the provision that may be included in Neighbourhood Development Plans about the use of land." These Regulations are set out in Statutory Instrument 2012 No 637, The Neighbourhood Planning (General)	The Neighbourhood Planning (General) Regulations 2012 have been used to inform the process of making the NP.
	Regulations 2012. Section 38B(4)(b) Regulations made by the Secretary of State may make provisions "requiring Neighbourhood Development Plans to include such matters as are prescribed in the Regulations."	A screening process was carried out by the local planning authority to determine whether a Strategic Environment Assessment (SEA) or Habitat Regulations Assessment (HRA) would be required in support of the Neighbourhood Plan. In both cases it was considered that the Copdock and Washbrook Neighbourhood Plan will not have significant environmental effects and that no European sites would be affected by the policies described in the NP.
	Section 38B, which include paragraphs 38B(4)(c), 5 & 6,	The remaining requirements of Section 38B are not of relevance to this Basic Conditions Statement
4B 8 (1)(d) Whether The Referendum Should Extend Beyond The NP Area	This requires the examiner to consider whether the area for any referendum should extend beyond the NP Area to which it relates.	The NP relates solely to land that falls within the Parish of Copdock and Washbrook.
4B 8 (1)(e) Other Matters 3.28.	This requires the examiner to consider such other matters as may be prescribed	There are no other prescribed matters.
Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018	These Regulations require an Appropriate Assessment of the Plan to be carried out should the SEA and HRA Screening Opinion deem it necessary.	The SEA and HRA Screening Opinion concluded that an Appropriate Assessment of the Plan was required. The Appropriate Assessment ahs been completed and consulted on.

3. Compliance with Basic Conditions

- 3.1 Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act sets out the basic conditions that must be met by a draft Neighbourhood Plan. Subsections (a), (d), (e), (f), and (g) are of relevance to this statement. The Regulations state that the neighbourhood plan will have met the basic conditions if it:
 - Has regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Contributes to the achievement of sustainable development;
 - Is in general conformity with the strategic policies of the development plan for the area; and
 - Is compatible with European Union (EU) and European Convention on Human Right (ECHR) obligations.

National Policy

- 3.2 The Copdock and Washbrook Neighbourhood Development Plan must have appropriate regard to national policy. The following section describes how the Plan relates to the National Planning Policy Framework (NPPF) which was originally published in 2012 amended in July 2018 and further amended in February 2019. It is the latter version of the NPPF that has been used as the basis to assess the Neighbourhood Plan in terms of its regard to national policies. The NPPF is framed around a basic premise of achieving sustainable development, comprising three main dimensions: economic, social and environmental. It requires the planning system to have regard to three overarching objectives:
 - a) "an economic objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - c) an environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."
- 3.3 The NPPF contains thirteen topic-based chapters in which more detailed policy guidance is set out for plan making and decision taking. Table 1, below, identifies how the Plan meets the basic condition of having regard to the NPPF by assessing the Plan against the principles for each of the NPPF topic-based chapters

Table 1 - Compatibility of the Plan's objectives and policies against the NPPF Core Principles

NPPF Topic	Copdock and Washbrook NP Objectives (as identified in Section 4 of the NP)	Copdock and Washbrook NP Policies
Delivering a sufficient supply of homes	Housing 1 Provide housing that meets the local needs of Copdock and Washbrook	Policy C&W 1 – Spatial Strategy Policy C&W 2 – Housing Development
	2 Enable opportunities for the provision of affordable housing that meets the needs of those with a connection with the village	Policy C&W 3 – Land south-east of Back Lane
	3 Encourage the incorporation of energy saving measures in new homes	
	4 Provide new homes that meet the accessibility and space requirements for the lifetime of residents	
Building a strong,	Business and Employment	Policy C&W 7 - Employment Sites
competitive economy	5 Maintain and improve employment opportunities that do not result in detrimental impacts on local infrastructure, the environment and residents' amenity	Policy C&W 8 - New Businesses and Employment Policy C&W 9 - Farm Diversification
	6 Improve opportunities for home working	
Ensuring the vitality of town centres	Not applicable to Copdock and Washbrook	None
Promoting healthy	Infrastructure and Services	Policy C&W 18 - Protecting existing services and facilities
and safe communities	12 Protect and enhance community facilities and services that meet the day to day needs of residents	Policy C&W 19 - Open Space, Sport and Recreation Facilities Policy C&W 20 - Public Rights of Way
	Highways and Movement	
	14 Reduce the impact of traffic passing through the village	
	15 Improve road safety	
	16 Protect and enhance the village public rights of way network	
Promoting	Highways and Movement	Policy C&W 1 – Spatial Strategy
sustainable transport	14 Reduce the impact of traffic passing through the village	Policy C&W 20 - Public Rights of Way
	15 Improve road safety	
	16 Protect and enhance the village public rights of way network	
Supporting high	Built Environment and Design	Policy C&W 16 - Design Considerations
quality communications	11 Ensure new development is of a high-quality design and of a scale and design that reflects local character.	
	Highways and Movement	

NPPF Topic	Copdock and Washbrook NP Objectives (as identified in Section 4 of the NP)	Copdock and Washbrook NP Policies
	14 Reduce the impact of traffic passing through the village	
	15 Improve road safety	
	16 Protect and enhance the village public rights of way network	
Making effective use	Natural Environment	Policy C&W 1 – Spatial Strategy
of land	7 Protect and enhance the local landscape and significant views	Policy C&W 10 - Area of Local Landscape Sensitivity Policy C&W 11 - Local Green Spaces
	8 Maintain and improve the biodiversity assets of the parish	Policy C&W 12 – Biodiversity
	9 Mitigate the impact of development on designated habitats including the Stour and Orwell estuaries.	Policy C&W 13 - Recreational Disturbance Avoidance and Mitigation Policy C&W 14 - Protection of Important Views and Landscape Character
Achieving well-	Housing	Policy C&W 3 – Land south-east of Back Lane
designed places	3 Encourage the incorporation of energy saving measures in new homes	Policy C&W 6 - Measures for New Housing Development Policy C&W 16 - Design Considerations
	4 Provide new homes that meet the accessibility and space requirements for the lifetime of residents	Policy C&W 17 - Sustainable Construction Practices
	Built Environment and Design	
	11 Ensure new development is of a high-quality design and of a scale and design that reflects local character.	
Protecting Green Belt land	Not applicable to Copdock and Washbrook	None
Meeting the	Housing	Policy C&W 6 - Measures for New Housing Development
challenge of climate change, flooding and	3 Encourage the incorporation of energy saving measures in new homes	Policy C&W 16 - Design Considerations Policy C&W 17 - Sustainable Construction Practices
coastal change	Infrastructure and Services	
	13 Ensure that development does not result in a detrimental impact on infrastructure including sewers and surface water and watercourse flooding	
Conserving and	Natural Environment	Policy C&W 10 - Area of Local Landscape Sensitivity
enhancing the natural environment	7 Protect and enhance the local landscape and significant views	Policy C&W 11 - Local Green Spaces Policy C&W 12 – Biodiversity
	8 Maintain and improve the biodiversity assets of the parish	Policy C&W 13 - Recreational Disturbance Avoidance and Mitigation
	9 Mitigate the impact of development on designated habitats including the Stour and Orwell estuaries.	Policy C&W 14 - Protection of Important Views and Landscape Character
Conserving the	Built Environment and Design	Policy C&W 15 - Heritage Assets
historic environment	10 Protect and enhance designated heritage assets	

NPPF Topic	Copdock and Washbrook NP Objectives (as identified in Section 4 of the NP)	Copdock and Washbrook NP Policies
Facilitating the sustainable use of minerals	Not applicable to the Neighbourhood Plan	None

How the purpose of the Neighbourhood Plan policies achieve sustainable development

3.6 The table below identifies the purpose of each policy in the Plan and its intended outcome in relation to achieving sustainable development as defined by the NPPF.

Policy	Purpose	Outcome
C&W 1	To provide a strategy for the location of new development within the neighbourhood plan area.	Ensures that new development is located close to existing village facilities and minimises the loss of agricultural land in remote locations.
C&W 2	Identifies the amount of new housing growth that will take place in the neighbourhood area and how this growth will be delivered.	Provides certainty in terms of the amount and location of new housing in the village to ensure that the identified housing needs are met.
C&W 3	Allocates a site for housing development.	Contributes to meeting the housing need on a site in close proximity to services and facilities.
C&W 4	Provides a mechanism for the delivery of affordable housing to meet local needs.	Will help people with a local connection remain in the village rather than move away to find affordable homes.
C&W 5	Sets requirements for house sizes.	Seeks to redress an imbalance in the size of homes in the village in order to support an identified need for homes for smaller families,
C&W 6	Sets internal floorspace standards and standards for ancillary measures in new homes	Ensures that new housing meets current national standards as well as providing for appropriate storage and facilities.
C&W 7	Protects existing employment sites from loss to other uses	Contributes towards building a strong and competitive economy
C&W 8	Promotes appropriate development of business and employment uses	Contributes towards building a strong and competitive economy
C&W 9	Enables the reuse of redundant agricultural buildings for economic purposes	Contributes towards building a strong and competitive economy
C&W 10	Designates an area of Local Landscape Sensitivity	Contributes to protecting and enhancing the natural environment
C&W 11	Designates spaces that meet the NPPF Local Green Space criteria.	Protects spaces that have an identifiable local importance to the village.
C&W 12	Provides criteria for the assessment of the potential impact of development on habitats and natural features.	Contributes to protecting and enhancing the natural environment, including helping to improve biodiversity.
C&W 13	Provides a mechanism for the management and mitigation for potential impacts on European wildlife sites	Contributes to protecting and enhancing the natural environment, including helping to improve biodiversity.
C&W 14	Identifies important views within the Plan Area that should be protected.	Protects and enhances the character and setting of the village.
C&W 15	Enables the preservation and enhancement of the village's heritage assets.	Provides a positive strategy for the conservation and enjoyment of the historic environment, including heritage.
C&W 16	Provides criteria for the consideration of the impact of development proposals.	Preserves and enhances the distinctiveness, character and sense of place of the village's built environment.
C&W 17	Promotes the incorporation within development proposals of measures that reduce energy consumption.	Supports an increase in the use of renewable and low carbon energy.
C&W 18	Supports the retention and improvement of community facilities and services in the village.	Maintains existing village services and reduce the need to drive out of the village for day to day needs.

Policy	Purpose	Outcome
C&W 19	Supports the improvement and protection of open space, sport and recreation facilities.	Ensures that adequate and suitable sports and recreation facilities are provided in the Neighbourhood Plan Area.
C&W 20	Promotes improvement to the public rights of way network	Contributes to health and wellbeing.

General conformity with the strategic policies contained in the development plan

3.7 The Neighbourhood Plan must demonstrate that it is in general conformity with the development plan for the local authority area concerned. The development plan currently in force is the Babergh Core Strategy (February 2014) and the saved policies of the Babergh Local Plan (Babergh Local Plan Alteration No.2 adopted June 2006).

Babergh District Council has announced its intention to prepare a new joint local plan with Mid Suffolk District Council to cover the two local planning authority areas. Consultation on the Submission Version of the Joint Local Plan took place in November 2020, after the Regulation 14 consultation on the Neighbourhood Plan. At the time of submitting the Neighbourhood Plan it is unsure as to whether the Joint Local Plan will be examined before the Neighbourhood Plan is. With this in mind, the Basic Conditions Statement has assessed the Neighbourhood Plan against the strategic policies of the Pre-Submission Joint Local Plan as well as those of the adopted Core Strategy and saved Local Plan policies.

Compatibility of the Neighbourhood Plan with the Strategic Policies of the Development Plan

3.8 The Government's Planning Practice Guidance states:

"Strategic policies will be different in each local planning authority area. When reaching a view on whether a policy is a strategic policy the following are useful considerations:

- whether the policy sets out an overarching direction or objective
- whether the policy seeks to shape the broad characteristics of development
- the scale at which the policy is intended to operate
- whether the policy sets a framework for decisions on how competing priorities should be balanced
- whether the policy sets a standard or other requirement that is essential to achieving the wider vision and aspirations in the Local Plan
- in the case of site allocations, whether bringing the site forward is central to achieving the vision and aspirations of the Local Plan
- whether the Local Plan identifies the policy as being strategic"
- 3.9 A significant number of policies in the Babergh Local Plan (2006) are officially "saved" by direction of the Secretary of State in accordance with the Planning and Compulsory Purchase Act 2004. A list of saved policies is available on the Babergh DC website at https://www.midsuffolk.gov.uk/assets/Strategic-Planning/BDC-current-policies-June-2016.pdf In total these amount to over 90 policies. Babergh District Council has not identified which of the saved local plan policies are of a strategic nature. In the absence of this, we have assessed compatibility of the Neighbourhood Plan policies against all policies that are considered relevant to the Neighbourhood Area. Those that are not considered relevant are listed in Appendix A of this statement.
- 3.10 The table below provides details of the policies in the development plan, a link to the Neighbourhood Plan policy (where relevant) and a narrative of conformity of the Neighbourhood Plan with the development plan. The final part of the table assesses how the Neighbourhood Plan performs against the strategic policies of the Pre-Submission Joint Local Plan.

Local Pl	lan Strategic Policy	Neighbourhood Plan Policy	Comment
Babergl	h Core Strategy 2014		
Fa	pplying the Presumption in avour of Sustainable evelopment in Babergh	All policies apply	All policies in the Neighbourhood Plan are positively worded to encourage sustainable development to take place in the village
CS2 Se	ettlement Pattern Policy	C&W 1 – Spatial Strategy C&W 2 – Housing Development	The policy identifies Copdock and Washbrook as Hinterland Villages that will "accommodate some development to help meet the needs within them". The Neighbourhood Plan accords with this policy.
	trategy for Growth and evelopment	C&W 1 – Spatial Strategy C&W 2 – Housing Development C&W 3 – Land south-east of Back Lane	The policy identifies the amount of economic and housing growth that will be planned for in Babergh, specifically the amount of housing across all hinterland villages. The Neighbourhood Plan provides a positive response to this policy.
fo	trategy for Development or Core and Hinterland illages	C&W 1 – Spatial Strategy C&W 2 – Housing Development C&W 3 – Land south-east of Back Lane	The policy provides detailed guidance on the function of hinterland villages and criteria for the consideration of new development proposals. Policy C&W 1 has had particular regard to this policy in determining the location for new development in the village and C&W 2 identifies the amount of new housing and how that will be delivered during the plan period.
	ustainable Design and onstruction Standards	C&W 6 – Measures for New Housing Development C&W 16 – Design Considerations C&W 17 – Sustainable Construction Practices	Most of the policy relates to new homes on larger scale developments identified in the Core Strategy or to be allocated in such as that allocated in the Site Allocations DPD which was never produced. However, the policy also requires non-residential development to achieve BREEAM "excellent" standard. The Neighbourhood Plan does not conflict with this policy.
	enewable / Low Carbon nergy	C&W 6 – Measures for New Housing Development C&W 16 – Design Considerations C&W 17 – Sustainable Construction Practices	The Policy encourages the use of on-site low and zero carbon technologies on new or existing buildings. The Neighbourhood Plan policies support this approach.

Local Plan Strategic Policy	Neighbourhood Plan Policy	Comment
CS14 Green Infrastructure	C&W 11 – Local Green Spaces C&W 19 – Open Space, Sport and Recreation Facilities	The policy protects and enhances green infrastructure. The Neighbourhood Plan contains policies that positively protects green infrastructure and encourages more provision.
CS15 Implementing Sustainable Development in Babergh	C&W1 – Spatial Strategy C&W2 – Housing Development C&W4 – Affordable Housing on Rural Exception Sites C&W5 – Housing Mix C&W6 – Measures for New Housing Development C&W8 – New Business and Employment C&W10 – Area of Local Landscape Sensitivity C&W11 – Local Green Spaces C&W12 – Biodiversity C&W13 – Recreational Disturbance Avoidance and Mitigation C&W14 – Protection of Important Views and Landscape Character C&W15 – Heritage Assets C&W16 – Design Considerations C&W17 – Sustainable Construction Practices C&W18 – Protecting Existing Services and Facilities C&W19 – Open Space, Sport and Recreation Facilities	The Core Strategy policy sets out criteria for the principles of sustainable development by which all proposals will be assessed. The Neighbourhood Plan contains a number of policies that will specifically contribute to achieving this policy.
CS16 Town, Village and Local Centres	C&W18 – Protecting Existing Services and Facilities	The Core Strategy policy provides for new retail, leisure, tourism, cultural and office development at an appropriate scale in village centres. While Copdock and Washbrook does not have an identifiable village centre, the Neighbourhood Plan does seek to protect and enhance existing facilities.
CS17 The Rural Economy	C&W7 - Employment Sites C&W8 – New Business and Employment C&W9 – Farm Diversification	The policy supports a range of economic initiatives in the rural area. The Neighbourhood Plan policies seek to maintain existing employment uses and promotes opportunities for appropriate new business uses.

Local Plan Strategic Policy	Neighbourhood Plan Policy	Comment
CS18 Mix and Types of Dwellings	C&W5 – Housing Mix	The Core Strategy policy states that the mix, type and size of the housing development will be expected to reflect established need. The Neighbourhood Plan has identified specific needs locally and reflects this in Policy C&W5.
CS19 Affordable Homes	C&W 3 - Land south-east of Back Lane	The Core Strategy policy sets requirement for the provision of 35% affordable housing on development sites. The national guidance subsequently introduces a threshold of developments of 10 homes, below which affordable housing should not be sought. The requirement is reflected in the allocation in Policy C&W 3.
CS20 Rural Exception Sites	C&W 4 – Affordable Housing on Rural Exception Sites	The Core Strategy policy enables the provision of affordable housing adjacent or well related to development boundaries in hinterland villages. The Neighbourhood Plan supports this policy but adds criteria that are specific to Copdock and Washbrook, including demonstrating a local connection.
CS21 Infrastructure Provision	C&W16 – Design Considerations C&W17 – Flooding and Sustainable Drainage C&W18 – Protecting Existing Services and Facilities C&W19 – Open Space, Sport and Recreation Facilities	The policy seeks to protect, safeguard and enhance existing services, facilities and amenities that are important to the sustainability of local communities. The Neighbourhood Plan identifies specific infrastructure in the village that should be protected or enhanced.
CS22 Monitoring	No specific policies apply	The Neighbourhood Plan does not conflict with the Core Strategy in respect of monitoring.
Babergh Local Plan (2006) Saved	Policies	
EN22 Light Pollution - Outdoor Lighting	C&W16 – Design Considerations	The policy seeks to minimise the provision of outside lighting and any glare or spillage to a minimum. The Neighbourhood Plan does not conflict with this policy.

Local Plan Strategic Policy	Neighbourhood Plan Policy	Comment
EN26 Telecommunications	C&W16 – Design Considerations	The policy sets out criteria for the consideration of proposals for new telecommunications equipment. The Neighbourhood Plan does not conflict with this policy.
HS05 Replacement Dwellings	C&W1 – Spatial Strategy C&W2 – Housing Development	The policy provides criteria by which proposals for the replacement of dwellings in the countryside will be considered. The Neighbourhood Plan does not conflict with this policy.
HS28 Infilling	C&W1 – Spatial Strategy C&W2 – Housing Development C&W16 – Design Considerations	The policy states in which circumstances development on infill plots will not be permitted. The Neighbourhood Plan does not conflict with this policy.
HS31 Public Open Space (Sites of 1.5 ha and above)	C&W3 – Land south-east of Back Lane	The Local Plan policy requires a proportion of larger housing sites to be public open space. Policy C&W3 conforms with this policy.
HS32 Public Open Space (New dwellings on sites up to 1.5ha)	C&W16 – Design Considerations	The policy requires proposals for all new residential development, ranging from a single dwelling up to the development of a 1.5 hectares site, to provide open space and play equipment in proportion to the number of dwellings to be built. The Neighbourhood Plan does not conflict with this policy.
HS33 Extensions to Existing Dwellings	C&W16 – Design Considerations	The policy provides criteria by which proposals for house extensions will be considered. The Neighbourhood Plan does not conflict with this policy.
HS35 Residential Annexes	C&W16 – Design Considerations	The policy provides criteria by which proposals for self-contained annexes will be considered. The Neighbourhood Plan does not conflict with this policy.
HS39 Special Needs Housing	No specific policies apply	The policy states that proposals for nursing, residential care, rest homes and sheltered housing and extensions to such homes should be provided in towns or defined sustainable villages. Copdock and Washbrook is not defined as a sustainable village. The Neighbourhood Plan does not conflict with this policy.

Local Plan Strategic Policy	Neighbourhood Plan Policy	Comment
HS40 Special Needs Housing: Conversions/Change of Use	No specific policies apply	The policy states that proposals for nursing, residential care, rest homes and sheltered housing and extensions to such homes should be provided in towns or defined sustainable villages. Copdock and Washbrook is not defined as a sustainable village. The Neighbourhood Plan does not conflict with this policy.
EM02 General Employment Areas – Existing and New Allocations	C&W7 - Employment Sites C&W8 – New Business and Employment C&W9 – Farm Diversification	The policy states that proposals for employment related development should be able to demonstrate a positive effect on town (or village) centre vitality and viability will be permitted. The Neighbourhood Plan does not conflict with this policy.
EM19 High Technology Employment Provision	No specific policies apply	The policy makes provision for how proposals for high technology employment provision will be considered. The Neighbourhood Plan does not conflict with this policy.
EM20 Expansion/Extension of Existing Employment Uses	C&W7 - Employment Sites	The policy provides for the expansion of existing employment uses subject to certain provisions. The Neighbourhood Plan does not conflict with this policy.
EM24 Retention of Existing Employment Sites	C&W7 - Employment Sites	The policy sets out criteria by which the redevelopment of existing or vacant employment land will be considered. The Neighbourhood Plan does not conflict with this policy.
SP04 Shopping in Local Centres and Villages	C&W18 – Protecting Existing Services and Facilities	The policy seeks the retention of shopping in villages. Policy C&W18 provides a locally specific policy that does not conflict with the dated saved policy.
SP05 Farm Shops	No specific policies apply	The policy provides criteria for the consideration of proposals for farm shops. The Neighbourhood Plan does not conflict with this policy.
CR04 Special Landscape Areas	C&W10 – Area of Local landscape Sensitivity	The policy sets out how proposals for development in the Special Landscape Area will be permitted. Due to the potential loss of this designation, as referred to in the subsequent Babergh Core Strategy and emerging Joint Local PLan, the Neighbourhood Plan updates this approach by reassessing the Special Landscape Area in Copdock and

Local Plan Strategic Policy	Neighbourhood Plan Policy	Comment
		Washbrook and redefines the area, as already established in the made Neighbourhood Plans across Babergh and Mid Suffolk.
CR07 Landscaping Schemes	C&W16 – Design Considerations	The policy requires a high standard of landscaping for any development permitted in the countryside. The Neighbourhood Plan does not conflict with this policy.
CR08 Hedgerows	C&W12 - Biodiversity	The policy seeks the protection of hedgerows in development proposals or suitable mitigation schemes. The Neighbourhood Plan does not conflict with this policy.
CR09 Agricultural Reservoirs	No specific policies apply	The policy provides criteria for the consideration of such proposals. The Neighbourhood Plan does not conflict with this policy.
CR10 Change of use from Agricultural Land	C&W1 – Spatial Strategy C&W16 – Design Considerations	The policy provides criteria for the consideration of proposals for the change of use from agricultural land to domestic gardens. The Neighbourhood Plan does not conflict with this policy.
CR13 Removal of Agricultural Occupancy Restrictions	No specific policies apply	The policy provides criteria for the consideration of proposals to remove the agricultural occupancy restrictions imposed by a condition of planning permission. The Neighbourhood Plan does not conflict with this policy.
CR18 Buildings in the Countryside – Non Residential	C&W1 – Spatial strategy C&W16 – Design Considerations	The policy provides criteria for the consideration of proposals for converting barns, or other redundant or under-used buildings in the countryside, to industrial, business, community or recreational uses. The Neighbourhood Plan does not conflict with this policy.
CR19 Buildings in the Countryside – Residential	C&W1 – Spatial strategy C&W2 – Housing Development C&W16 – Design Considerations	The policy provides criteria for the consideration of proposals for the conversion of barns or other redundant or under-used buildings in the countryside into dwellings or holiday accommodation. The Neighbourhood Plan does not conflict with this policy.
CR24 Village Schools	C&W18 – Protecting Existing Services and Facilities	The policy provides support for the use of closed village schools for community uses in the first instance.

Local Plan Strategic Policy	Neighbourhood Plan Policy	Comment
CN01 Design Standards	C&W6 – Measures for New Housing Development C&W16 - Design Considerations C&W17 – Sustainable Construction Practices	The policy requires development proposals to be of appropriate scale, form, detail, design and construction materials. The Neighbourhood Plan reinforces this policy by providing a local context.
CN03 Open Space within Settlements	C&W11 – Local Green Spaces C&W19 – Open Space, Sport and Recreation Facilities	The policy states that development leading to the loss of important open space, visually important gaps in the street scene or recreational facilities within towns and villages will not be permitted. The Neighbourhood Plan reinforces this policy by identifying locally important open spaces.
CN04 Design & Crime Prevention	C&W16 - Design Considerations	The policy seeks to ensure that development is designed to deter vandalism and crime. The Neighbourhood Plan does not conflict with this policy.
CN06 Listed Buildings - Alteration/Extension/Change of Use	C&W15 – Heritage Assets	The policy provides criteria for the consideration of proposals for the alteration (including part demolition), extension or change of use of listed buildings. The Neighbourhood Plan updates this policy in the light of the NPPF.
RE06 Small and Medium - Scale Recreation	C&W19 – Open Space, Sport and Recreation Facilities	The policy addresses proposals for small or medium-scale recreation facilities and change of use to recreation in the countryside. The Neighbourhood Plan does not conflict with this policy.
RE07 Large Scale Recreation	No specific policies apply	The policy states that large scale recreational facilities will only be permitted adjacent to Sudbury, Hadleigh and Ipswich. The Neighbourhood Plan does not conflict with this policy.
TP15 Parking Standards – New Development	C&W6 – Measures for New Housing Development C&W16 - Design Considerations	The policy states that development proposals should provide parking in accordance with the adopted standards. The Neighbourhood Plan does not conflict with this policy.
TP16 Green Travel Plans	C&W8 – New Business and Employment	The policy requires proposals for development that employ more than 25 people to prepare and implement a Travel Plan. The Neighbourhood Plan does not conflict with this policy.

Local Plan Strategic Policy	Neighbourhood Plan Policy	Comment
Emerging Joint Local Plan Strateg	gic Policies (November 2020)	
SP01 Housing Needs	C&W1 – Spatial strategy C&W2 – Housing Development C&W3 – Land south-east of Back Lane	The emerging Joint Local Plan identifies the minimum housing requirement for each district. The Neighbourhood Plan does not conflict with this requirement.
SP02 Affordable Housing	C&W2 – Housing Development C&W3 – Land south-east of Back Lane C&W4 – Affordable Housing on Rural exception Sites C&W5 – Housing Mix	The emerging Joint Local Plan sets a requirement of 35% affordable housing on large sites. The allocation in C&W3 is in conformity with the emerging policy.
SP03 Settlement Hierarchy	C&W1 – Spatial strategy	The emerging Joint Local Plan identifies a hierarchy of settlements across the two districts. The Neighbourhood Plan has been prepared to have regard to this Policy.
SP04 Housing Spatial Distribution	C&W1 – Spatial strategy C&W2 – Housing Development C&W3 – Land south-east of Back Lane	The emerging Joint Local Plan identifies a minimum housing requirement of 274 additional dwellings in Copdock and Washbrook. The Neighbourhood Plan has been prepared to conform with this requirement.
SP05 Employment Land	C&W7 - Employment Sites C&W8 – New Business and Employment	The emerging Joint Local Plan identifies strategic sites for employment uses. It supports additional employment sites being developed along strategic transport corridors. There are no strategic employment sites in the Neighbourhood Area and the Neighbourhood Plan enables the provision of suitable additional employment development.
SP06 Retail and Town Centre Use	No specific policies apply	The emerging Joint Local Plan policy relates to defined town centres, which does not include Copdock and Washbrook.
SP07 Tourism	No specific policies apply	The emerging Joint Local Plan policy supports the development of appropriate tourism enterprises. The Neighbourhood Plan does not conflict with this aspiration.
SP08 Strategic Infrastructure Provision	C&W 13 - Recreational Disturbance Avoidance and Mitigation C&W16 - Design Considerations	The emerging Joint Local Plan policy identifies specific strategic infrastructure projects and also requires development to make

Local Plan Strategic Policy	Neighbourhood Plan Policy	Comment
		community infrastructure levy contributions. The Neighbourhood Plan provides appropriate measures to support the strategic policy.
SP09 Enhancement and Management of the Environment	C&W3 – Land south-east of Back Lane C&W 10 - Area of Local Landscape Sensitivity C&W 13 - Recreational Disturbance Avoidance and Mitigation	The emerging Joint Local Plan policy supports the enhancement and management of natural and local environment and provides for the mitigation of effects on protected habitat sites. The Neighbourhood Plan policies generally support the strategic policy and specifically sets requirements for the mitigation of impacts through site specific or general mitigation.
SP10 Climate Change	C&W6 – Measures for New Housing Development C&W16 - Design Considerations	The emerging Joint Local Plan policy sets requirements for the mitigation of the impacts of climate change. The policies of the Neighbourhood Plan support the intent of the Joint Local Plan.

4. Compatibility with European Union Obligations and Human Rights

Environmental Impact and Habitat Regulations

- 4.1 Section 4B 8 (2)(f) states that a draft Neighbourhood Plan will meet the basic conditions if, the making of the Neighbourhood Plan does not breach, and is otherwise compatible with EU obligations and the making of the neighbourhood plan is not likely to have a significant effect on a European site or a European offshore marine site, either alone or in combination with other plans or projects.
- 4.2 European Union Directive 2001/42/EC requires a Strategic Environmental Assessment (SEA) to be undertaken for certain types of plan or programmes that would have a significant environmental effect. The Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations) that this is to be determined by a screening process which should use a specified set of criteria (set out in Schedule 1 of the Regulations). The results of this process must be set out in an SEA Screening Statement, which must be publicly available.
- 4.3 In accordance with Regulation 9 of the Regulations, as amended by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018, Copdock and Washbrook Parish Council requested Babergh District Council, as the responsible body, to consider whether an environmental assessment of the emerging Neighbourhood Plan is required. The District Council subsequently made this determination following consultation with the statutory consultees. The determination is set out in reports "Copdock and Washbrook Neighbourhood Plan Strategic Environmental Assessment Screening Determination" and the "Copdock and Washbrook Neighbourhood Plan Habitats Regulations Screening Determination" both dated June 2020. The outcome of this exercise was that the need for both were 'screened-in'. Consequently, a Strategic Environmental Assessment was prepared by AECOM Consultants with three recommended amendments to the Plan. These have been incorporated into the Submission Neighbourhood Plan. The Environment Agency, Historic England and natural England were consulted on 4 January 2021. Natural England and Historic England responded to the consultation but no response was received from the Environment Agency. The responses are included as Appendix B of this Basic Conditions Statement.
- 4.4 In line with Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) these documents are also submitted to Babergh District Council alongside the Neighbourhood Development Plan.

Human Rights

- 4.3 The public consultation process for the Copdock and WAshbrook Neighbourhood Plan has been wide and inclusive and has included direct engagement with the local community. The policies contained within the plan do not disadvantage any minority group or group with protected characteristics.
- 4.4 The overall purpose of the Neighbourhood Development Plan is to improve the quality of life for people living and working now and in the future in the parish from an environmental, social and economic point of view. The aims and policies in the Neighbourhood Plan have been formulated in response to local people's views and in the light of evidence gathered for the parish, in order to meets the needs expressed and address the issues identified. In order to confirm that the Neighbourhood Plan does not have any unintended consequences for particular groups, the strategic aims and the policies in the Plan have been systematically scrutinised to ensure that they do not disadvantage any potentially vulnerable groups. The Equality Act 2010 places a duty on all public authorities in the exercise of their functions to have regard to the need to eliminate discrimination, to advance equality of opportunity, and to foster good relations between persons who have a "protected characteristic" and those who do not. "Protected characteristics" are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 4.5 This section assesses the Submission Draft of the Neighbourhood Plan to ensure that Copdock and Washbrook Parish Council is satisfying its statutory duties in this regard. An assessment has been made on whether the objectives and the policies in the Neighbourhood Plan have a positive, negative or neutral impact on each of the protected characteristics. The purpose of each of the objective and the policies in the Neighbourhood Plan are provided, and their likely impact on persons with protected characteristics is assessed.

Impact of Objectives of Copdock and Washbrook Neighbourhood Development Plan on Persons with Protected Characteristics

Nei	ighbourhood Plan Objectives	Outcome for persons with Protected Characteristics
Hou	using	
1 2 3	Provide housing that meets the local needs of Copdock and Washbrook Enable opportunities for the provision of affordable housing that meets the needs of those with a connection with the village Encourage the incorporation of energy saving	Provides for new homes to be provided in the village and that they respond to local needs. Broadly positive impact for persons with certain protected characteristics.
4	measures in new homes Provide new homes that meet the accessibility and space requirements for the lifetime of residents	
Bus	iness and Employment	
5	Maintain and improve employment opportunities that do not result in detrimental impacts on local infrastructure, the environment and residents' amenity	Promotes the retention and improvement of job opportunities in the Plan Area. Broadly positive impact for persons with certain protected characteristics.
6	Improve opportunities for home working.	
	cural Environment	
7	Protect and enhance the local landscape and	Protects and enhances the natural environment for the benefit
8	significant views Maintain and improve the biodiversity assets of the parish	of residents. Broadly positive impact for persons with certain protected characteristics.
9	Mitigate the impact of development on designated habitats including the Stour and Orwell estuaries.	
Bui	t Environment and Design	
10	Protect and enhance designated heritage assets	Promotes the preservation of the character and historic assets of the village. Neutral impact for persons with protected characteristics.
11	Ensure new development is of a high-quality design and of a scale and design that reflects local character.	Promotes development that is designed in a way to minimise impact on the environment and meets the needs of the community. Broadly positive impact for persons with certain protected characteristics.
Infr	astructure and Services	
12	Protect and enhance community facilities and services that meet the day to day needs of residents	Ensures that capacity of infrastructure and services is maintained and enhanced. Broadly positive impact for persons with certain
13	Ensure that development does not result in a detrimental impact on infrastructure including sewers and surface water and watercourse flooding	protected characteristics.
Hig	hways and Movement	
14	Reduce the impact of traffic passing through the village	Promotes the management and improvement of then highways network, including improved safety. Broadly positive impact for
15 16	Improve road safety Protect and enhance the village public rights of way network	persons with certain protected characteristics.

Impact of Copdock and Washbrook Neighbourhood Development Plan Policies on Persons with Protected Characteristics

Policy	Purpose	Outcome
C&W1	To provide a strategy for the location of new development within the neighbourhood plan area.	Ensures that the Neighbourhood Plan is positively prepared for the amount and location of new development required in the village during the plan period.
		Broadly positive impact for persons with certain protected characteristics.
C&W2	Identifies the amount of new housing growth that will take place in the neighbourhood area and how this growth	Ensures that the Neighbourhood Area meets its identified housing need.
	will be delivered.	Broadly positive impact for persons with certain protected characteristics.
C&W3	Allocates a site for housing development.	Policy allocates a site for housing development.
		Broadly positive impact for persons with certain protected characteristics.
C&W4	Provides a mechanism for the delivery of affordable housing to meet local needs.	Contributes to meeting affordable housing needs in suitable locations in close proximity to the village centre.
		Broadly positive impact for persons with certain protected characteristics.
C&W5	Sets requirements for house sizes.	Ensures that new homes are constructed to meet the current needs of users.
		Broadly positive impact for persons with certain protected characteristics.
C&W6	Sets internal floorspace standards and standards for ancillary measures in new homes.	Ensures that new homes meet Government standards and provide for modern requirements.
		Broadly positive impact for persons with certain protected characteristics.
C&W7	Protects existing employment sites from loss to other uses	Ensures that opportunities for local employment remain the Neighbourhood Area.
		Broadly positive impact for persons with certain protected characteristics.
C&W8	Promotes appropriate development of business and employment uses	Ensures that opportunities for local employment remain the Neighbourhood Area.
		Broadly positive impact for persons with certain protected characteristics.
C&W9	Enables the reuse of redundant agricultural buildings for economic	Enables opportunities for farm diversification.
	purposes	Neutral impact on persons with protected characteristics.
C&W10	Designates an area of Local Landscape Sensitivity	Ensures that locally significant landscapes are protected from the impact of development.
		Neutral impact on persons with protected characteristics.

Policy	Purpose	Outcome
C&W11	Designates spaces that meet the NPPF Local Green Space criteria.	Ensures that locally identified green spaces that meet the national criteria are protected from inappropriate development.
		Broadly positive impact for persons with certain protected characteristics.
C&W12	Provides criteria for the assessment of the potential impact of development on habitats and natural features.	Protects habitat features from the impact of inappropriate development.
		Neutral impact for persons with certain protected characteristics.
C&W13	Provides a mechanism for the management and mitigation for potential impacts on European wildlife sites	Protects internationally important designated sites from the impact of development.
	·	Neutral impact for persons with certain protected characteristics.
C&W14	Identifies important views within the Plan Area that should be protected.	Protects the Neighbourhood Area from unsympathetic development.
		Neutral impact for persons with certain protected characteristics.
C&W15	Enables the preservation and enhancement of the village's heritage	Protects designated assets from inappropriate development.
	assets.	Neutral impact for persons with certain protected characteristics.
C&W16	Provides criteria for the consideration of the impact of development proposals.	Reduces detrimental impact of development on the village and its environment and infrastructure.
		Neutral impact for persons with certain protected characteristics.
C&W17	Promotes the incorporation within development proposals of measures that	Helps contribute to minimising the impacts of climate change.
	reduce energy consumption.	Neutral impact for persons with certain protected characteristics.
C&W18	Supports the retention and improvement of community facilities and services in the village.	Promotes the provision of services in the village for the day-to-day needs of residents.
	. 3	Broadly positive for persons with certain protected characteristics.
C&W19	Supports the improvement and protection of open space, sport and recreation facilities.	Ensures that Copdock and Washbrook has open space facilities to serve the local population.
	iaciiiues.	Broadly positive impact for persons with certain protected characteristics.
C&W20	Promotes improvement to the public rights of way network	Ensures opportunities for access to the countryside remain.
	3	Broadly positive impact for persons with certain protected

Certain protected characteristics are not affected by the Neighbourhood Plan, namely gender reassignment, race, religion, or sexual orientation. For persons with these characteristics, the Plan has a neutral effect. Where policies in the Plan would adversely affect persons with these protected characteristics, they would not be differently affected than persons without these characteristics. For example, if a person with these protected characteristics were disadvantaged by a policy, it would have the same consequence for a person without the protected characteristic who wished to do the same thing. Similarly, if a person with one of these protected characteristics were to benefit from a policy, it would have the same benefit for a person without the protected characteristic in the same circumstances.

APPENDIX A

Adopted and saved development plan policies that do not apply to Copdock and Washbrook Neighbourhood Plan

The following policies in the Babergh Development Plan (Core Strategy and Local Plan) are not appropriate to Copdock and Washbrook, either because they are not of a strategic nature or do not apply to the village and have therefore not been assessed in this Basic Conditions Statement.

Babergh Core Strategy 2014	
CS4 Chilton Woods Strategic Land Allocation and Strategic	tegy for Sudbury / Great Cornard
CS5 Strategic Broad Location – East of Sudbury / Great	t Cornard
CS6 Hadleigh	
CS7 Strategic Site Allocation - Babergh Ipswich Fringe	
CS8 Sproughton Strategic Employment Site Allocation	
CS9 Wherstead Strategic Employment Site Allocation	
CS10 Brantham Regeneration Area Allocation	

Babergh Local Plan (2006) Saved Policies
HS11 Head Lane, Great Cornard
HS12 William Armes Factory, Cornard Road, Sudbury
HS13 High Bank, Melford Road, Sudbury
HS14 Peoples Park, Sudbury
HS15 Grays Close, Hadleigh
HS16 Gallows Hill, Hadleigh
HS17 Carsons Drive, Great Cornard
HS18 Bures Road, Great Cornard
HS19 Rotherham Road, Bildeston
HS20 Friends Field/Tawney Rise, Bures
HS21 Goodlands Farm, Daking Avenue, Boxford
HS22 Folly Road, Great Waldingfield
HS23 Church Farm, Whatfield
HS24 Church Lane, Sproughton
HS25 Land at Crownfield Road, Glemsford
EM03 Land to south-east of Lady Lane Hadleigh
EM04 Former 'British Sugar' Sproughton
EM05 Wherstead Office Park, Wherstead
EM06 Land at Brantham Industrial Area
EM07 Land at Bures Road, Great Cornard
EM08 Warehousing & Distribution
EM09 Leisure & Sport at Employment Areas
EM11 Notley Enterprise Park, Raydon/Great Wenham
EM12 Bull Lane/Acton Place
EM13 Pond Hall Industrial Estate, Hadleigh
EM14 Tentree Road, Great Waldingfield
EM15 Off Brook Street, (E W Downs) Glemsford
EM16 London Road, Capel St Mary

APPENDIX B

Responses from Government Bodies to SEA Consultation January 2021

Natural England 8 February 2021

Dear

Re. Copdock and Washbrook Neighbourhood Plan - SEA Report

Thank you for your email dated 4th February 2021.

Natural England concurs with the conclusions of the Environmental Assessment and has no comments to make on the proposed amendments to the Plan.

Yours sincerely

Jacqui Salt

Natural England

Consultation Service

Hornbeam House

Crewe Business Park, Electra Way,

Crewe, Cheshire, CW1 6GJ

Historic England 5 February 2021

I am writing in relation to the following:

SEA/SA/IIA: Strategic Environmental Assessment/ Sustainability Appraisal/ Integrated Impact Assessment Copdock and Washbrook Neighbourhood Plan Strategic Environment Assessment, Suffolk [Case Ref. PL00705422; HE File Ref.; Your Reference.]

Thank you for your request for an opinion on the SEA and its conclusions, alongside the amendments suggested. I attached a brief response for your records, but I can confirm I agree with the SEA's conclusions and recommendations, and would welcome the amended policy related to the Site Allocation for 'Land off Back Lane'. I hope that is useful, but please contact me if you have any queries.

Yours Sincerely

Edward James Historic Places Advisor, East of England