

## CARLTON COLVILLE NEIGHBOURHOOD PLAN EXAMINATION

### RESPONSE BY CARLTON COLVILLE TOWN COUNCIL TO EXAMINER'S QUESTIONS OF 21<sup>ST</sup> SEPTEMBER 2023

Policy CC1 prevents the material reduction of garden space where there is any detrimental impact on the amenity of neighbours. Is it possible to point me to definitions of material reduction and detrimental impact on residential amenity?

A 'material reduction' in garden space is considered to be where the remaining garden space is unreasonably small relative to the size of the dwelling. Whilst there is no hard-and-fast rule for this, the experience of developments in Carlton Colville where extensions into a rear garden have been considered to represent a material reduction are where a house has been extended to become a large family home (typically 4 bedrooms or more) but in doing so has lost more than 50% of its garden space. Rear gardens in Carlton Colville are generally not very large and therefore such a reduction has resulted in spaces of less than 50m<sup>2</sup>. Allowing for patios and decking that commonly accompany houses, the amount of green space can be as little as half of this. The resultant limits on the potential for biodiversity to thrive are considerable.

For this reason it is considered that a 'material reduction' in garden size is one where there is more than a 50% reduction in the garden size.

A 'detrimental impact on residential amenity' relates principally to a loss of light and privacy. The latter relates more commonly to extensions at the first floor level in respect of overlooking.

Explanations of both terms could be added to the supporting text to Policy CC1.

Policy CC2 requires the preservation of views. Please can you point me to detailed information in respect of precisely what the Policy seeks to preserve; and please can you point me to evidence that Policy views iii) and iv) can be preserved whilst ensuring that the relevant Local Plan allocation can be delivered?

The information regarding specifically what each view seeks to preserve is given in the supporting text and is underpinned by the Heritage Impact Assessment undertaken for Waveney District Council in 2018 (and included in the evidence base consulted on at Regulation 16<sup>1</sup>). These are considered to be the best visual reflections of the history of the area, including the old village of Carlton Colville and the two churches (St Peter's Church which dates back to the 14<sup>th</sup> Century and the Grade I listed Gisleham Church which is at least an 11<sup>th</sup> Century building) within the historic landscape.

View 3 is across the area shown in the indicative masterplan in the Waveney Local Plan for a country park. As noted in paragraph 4.47 of the Neighbourhood Plan, the 2018 Heritage Impact Assessment of Bell Farm assessed the potential impact of development looking southwards from the scheduled monument moat site towards the Grade I listed Gisleham Church. It noted that this was an historic landscape view which should be preserved; more detail is provided in paragraphs 6.8 and 6.9 of the Heritage Impact Assessment. View 3 is from the scheduled monument towards the church, therefore

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<sup>1</sup> <https://eastsuffolk.inconsult.uk/gf2.ti/f/1512514/166185381.1/PDF/-/Heritage%20Impact%20Assessment%20-%20Proposed%20development%20of%20Land%20South%20of%20The%20Street.pdf>

the delivery of the country park in this location, as required by the Local Plan allocation, is required to preserve this view. The (late) response at Regulation 16 by Historic England supports the proposal to create a country park in this location because this will “protect the immediate setting of the moated site and protects the water supply to it which maintains a stable environment for the probable water-logged archaeological deposits in the moat.”

It is acknowledged that View 4 from the top of Bloodmoor Hill is within the indicative masterplan area in the Local Plan allocation designated for residential use. However, residential development would not automatically mean that the view is lost. By its nature it is a relatively long view (nearly a kilometre) towards Gisleham Church’s towers from a raised position. With this informing the layout of the residential development, it would be easy to provide a view corridor, for example along a roadway. It would only be housing in the immediate proximity of Bloodmoor Hill that would potentially restrict that view. As you move further away from the top of the hill, down to the lower ground, there would be little if any impact. It is therefore considered that this would not in any way limit the level or type of development required by the Local Plan allocation. It is simply additional context that would inform the detailed masterplanning.

It should be noted that there is an error in paragraph 4.44. In the third line it should refer to ‘four’ views rather than ‘three’.

*I have been unable to locate evidence that all of the routes referred to in Figure 5.3 are deliverable or that the Policy requirements meet the NPPF Para 57 tests in respect of planning obligations.*

*Is there specific, substantive evidence you can point me to in justification of the approach set out in Policy CC3?*

Carlton Colville Town Council recognises the confusion that Policy CC3 and the map in Figure 5.3 causes and the potential issues relating to the deliverability of certain routes listed. The Key Movement Routes should only comprise the routes shown by a solid red line in Figure 5.3. In other words, the ‘Key Corridor Recommendations’ (illustrated by the solid orange lines) are not considered to be Key Movement Routes. (It is also acknowledged that the Key Movement Routes outside the Neighbourhood Area are not within the influence of Policy CC5; their purpose is to provide an understanding of the wider context for connecting up with other areas).

Therefore, in summary:

- Key Movement Routes should be protected (in terms of safety and/or accessibility) and proposals to enhance them are strongly encouraged.
- Key Corridor Recommendations are aspirational routes, the provision of which will be supported.

*Policy CC7 appears to impose requirements that are different to the indicative plan relating to the adopted allocation in the Local Plan at Bell Farm. The indicative plan in the Local Plan provides for flexibility through the application process.*

*As presented, the Neighbourhood Plan appears to go further than this and consequently, Policy CC7 appears to seek to introduce requirements different to and potentially in conflict with, the Local Plan*

allocation. Please can you point me to substantive evidence in justification of the approach set out in Policy CC7?

Carlton Colville Town Council understands that the matters of concern relate to the items listed in Policy CC7A(i). It is acknowledged that it is not within the gift of the Neighbourhood Plan to alter the indicative location of the uses as shown in the Local Plan policy and the indicative masterplan. What Policy CC7A(i) is seeking to ensure is that our local knowledge of traffic, choke points, parking and impact on existing residents is used to enable the school to be both accessed easily from the new development whilst minimizing impact on existing residents. We want to ensure complementary amenities are located close to one another. For example, it is logical that the play facilities are located near to the school as children will use them regularly before and after school. Equally, it is logical that the shops are located reasonably close to the retirement community so that residents can easily access the shops on foot. In addition providing easy access to the proposed country park would seem a logical and beneficial solution.

It may assist if reference to 'in the heart of the development' is removed from Policy CC7A(i). There would need to be related amendments to the supporting text.

...there is an opportunity for Carlton Colville Town Council to respond to any of the representations made during Regulation 16 (the Submission stage) consultation, should the Forum wish to do so.

Carlton Colville Town Council has reviewed the representations submitted at Regulation 16 and would make the following responses. For avoidance of doubt, the Town Council has only sought to respond to matters where, in its opinion, a response will assist the Examination.

#### East Suffolk Council

- Policy CC4. It is acknowledged that this is some inadvertent repetition of text. The repeated text in Clause C should be deleted.
- We note and support the suggested amendments to paragraph 4.16, paragraph 4.41 second sentence, the 'Particular Views' section, paragraph 4.44, Policy CC5A (second paragraph) and Policy CC5D.

#### Optima Carlton Colville Ltd

- Optima is an unknown organization to Carlton Colville Town Council. They have made no representation or comments at any previous stages of the Neighbourhood Plan process. During formal discussions with East Suffolk Council, advice was sought on any developers we should approach and we were informed by ESC that no firm interest had been brought forward (this was in 2020). As part of the Regulation 14 consultation process, the landowner was informed of the public consultation via letter but no representations were received.
- The Design Code was prepared in conjunction with AECOM Neighbourhood Plan design experts. The workshops and discussions we had helped shaped our community requirements however following extensive discussion with ESC and SCC after the conclusion of the Regulation 14 public consultation, it was agreed that the Town Council would remove the Design Code from the Neighbourhood Plan and its evidence base. The reason was that it was considered to be too prescriptive in respect of the Bell Farm site when no formal plans had been brought forward for any of the key sites in Carlton Colville. The key elements of the Design Code were incorporated where relevant into the current policies with agreement from both ESC planners and SCC. The report was not included as part of the Regulation 15

submission documents or the Regulation 16 consultation therefore it was no longer a relevant part of the evidence base for Optima to comment on.

Suffolk County Council

- Policy CC7A(i). The suggested amendment to the policy to require the uses to be well designed and located in a way that is accessible by active and sustainable modes of travel is supported.

Broads Authority

- We note and accept the suggested amendments to Policy CC1B(i), Policy CC5A and Policy CC6B.