

# Responses to Carlton Colville Neighbourhood Plan

## Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 10 May to 21 June 2023

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# Responses

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# What is the purpose of this document?

Carlton Colville Town Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being submitted for independent examination.

East Suffolk Council publicised the Plan and invited representations to be forwarded to the examiner for consideration alongside the Plan.

This document contains all representations received during the publicity period of 10 May to 21 June 2023.

# East Suffolk Council

Please find comments from East Suffolk Council in the table below.

| Part of Neighbourhood Plan        | Comments  |
|-----------------------------------|---|
| General Comments and Observations | A thoughtful and well written plan with a good focus on important local issues.   |
| General Comments and Observations | The Consultation Statement is very good in setting out how comments received via the Regulation 14 consultation have been addressed. It is clearly presented and shows thoughtful consideration has been given to the comments and subsequent changes.                |
| General Comments and Observations | Page numbers for the list of policies on the contents page would be helpful. Hyperlinks in the document from the contents page would also be very helpful and make the document easier to use.  |
| Table 2.1                         | The Council would support the protection of these assets in the neighbourhood plan.   |
| Para. 4.16                        | <i>“Provide space for nature (including the retention of the best of existing hedgerows and trees)”</i> – We would support strengthening of this wording such as: <i>“Providing space for nature with a presumption for retaining existing hedgerows and trees”</i> . |
| Para. 4.41, 2nd sentence          | It is considered that this wording should be broadened to allow for consideration of the settings of Listed Buildings or monuments are not purely in ‘close proximity’.   |
| Particular Views Section          | The view from the churchyard out towards open countryside to the south west is also considered to be of value.  |
| Para. 4.44                        | This references three identified views. I think this is an error and it should refer to four views.   |

|                         |   |
|-------------------------|---|
| Policy CC4: Car Parking | <i>“Car parking arrangements should be safe, convenient and should not undermine the quality and amenity of the streets.”</i> – this text is in criterion A <i>and</i> C and I wonder if this is a mistake. It is the main content of A and will apply in all cases, therefore I suggest it could be removed from C.  |
| Policy CC5, A           | <p>Some minor amendments are recommended to this criterion. Firstly, it is considered that the second sentence should specify that it applies to lost habitats where they have biodiversity value. Secondly, it is considered that the policy could be made more effective where it comes to addressing where off-site biodiversity net gain is provided. We have set out below a hierarchy in a suggested modification to this criterion to ensure that the biodiversity net gain gives the greatest benefit to the neighbourhood area as possible:</p> <p><i>A. All development proposals should aim to protect existing habitats and species, including hedgerows and mature trees. In particular, developments required to deliver measurable biodiversity net gain (a minimum of 10%) that propose the removal or reduction of existing habitats <u>of biodiversity value</u> will be expected to deliver biodiversity net gain on site. <u>The whole of the net gain must be delivered on site unless exceptions permitting off-site delivery are formally agreed with the Local Planning Authority. Off-site delivery should be sought based on the following hierarchy: within the neighbourhood plan area; within East Suffolk; within Suffolk; within the East of England; within England. Provision outside of the neighbourhood plan area must be justified and agreed with the Local Planning Authority.</u></i></p> |
| Policy CC5, D.          | This could specify that enclosures and/or barriers that are necessary around drainage or flood mitigation shall be sensitively designed to minimise visual impact and not detract from benefits such as amenity, recreation, biodiversity and water quality.  |

These comments are provided at officer level and do not prejudice any future decisions the Council may take.

## Broads Authority

Bottom of page 2 says 'to have measures in place to positively contribute to climate change'. This could be worded better as you probably mean mitigate, adapt and become resilient to climate change rather than contribute to it.

Figure 2.1 – it is difficult to read the small text.

4.40 and policy CC1, A, vi – the aim should be to not have light pollution, rather than limiting it. By saying limiting, it implies that light pollution is ok to some extent. The very fact that it is light pollution implies it is wasted light. It will be better to refer to good lighting management and design as well as refer to light spill from internal lighting needing to be mitigated.

**Objection** Policy CC1, B, I – the last sentence says 'This only applies to new development as opposed to extensions of existing properties' – however design of extensions is very important and this exclusion clause seems contrary to Local Plan policies and the NPPF in downplaying the importance of design in development of all kinds. We propose splitting this into three criteria and amending the text relating to extensions:

1. Use of a variety of brick, flint and render finishes along with roof styles that visually link development with the best aspects of the existing 'old village' area.
2. The choice of materials is expected to minimise the carbon footprint of development.
- iii. ~~This only applies to new development as opposed to extensions of existing properties.~~ Extensions need to be designed to reflect the 'host' building and the surroundings.

6.18 – says 'the site' – what site is that?

**Objection** - Policy CC5 – A – says 'all development proposals should aim to protect habitats and species...' the use of the word 'aim' weakens the policy stance in terms of the natural environment and is therefore contrary to SP6 and DM13 of the Local Plan for the Broads which say, inter alia, that 'development will protect the value and integrity of nature conservation interests'. The word 'should aim' needs to be removed from CC5 and replaced with a stronger stance.

Policy CC5 C – would be better if it were split up into two criteria as they are not necessarily related.

Policy CC6 B – it is not clear why householder applications are not to address this lighting guide. Such schemes could include lights that are poorly designed. The wording that says 'other than householder development' therefore needs to be removed.

Policy CC6 D – even though these may be for safety reasons, they still need to be designed well, for the lighting task. As such, this policy criterion could be improved to say that such schemes need to be designed to good lighting standards.

## Andy Needham

I am writing to express my objections to the propose development on the "land south of the street".

This land is a greenfield site providing vital farm land for food production (essential during the current cost of living crisis and lack of imported food from Ukraine due to the war). It also provides habitat for a large number of birds such as skylarks, as well as other wildlife and plants. It is also the only easily accessible large green space for local residents to enjoy and is used regularly for walking, dog exercise, fresh air and wildlife spotting. Essential for the physical and mental health of the local population.

I also have grave concerns about the local road infrastructure which will not be able to support the huge levels of additional traffic and traffic pollution this development would generate. The village is already at gridlock during busy times at points along The Street, especially around the pubs and school.

Finally, I am concerned about the additional noise implications of the development. In particular, the proposed siting of a primary school right next to existing housing. Is another school required anyway considering that there is one just the other side of The Street?

*If* additional housing and schooling is required in the area I believe that it should be restricted to brownfield sites only and not impact on the welfare of local residents.



# Anglian Water

Anglian Water welcomes the opportunity to comment on the Carlton Colville Neighbourhood Plan submission consultation. As the statutory sewerage undertaker for the neighbourhood plan area, Anglian Water has the following comments in support of the neighbourhood plan in the context of our role and purpose:

## **Policy CC5: Biodiversity Net Gain and Wildlife Friendly Development**

Anglian Water is supportive of the policy aims, particularly the requirement for sustainable drainage systems in new development manage surface water effectively on site, whilst achieving multi-functional benefits for biodiversity and amenity.

It is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024. However, we welcome this policy to ensure SuDS are incorporated in new developments, until the Schedule is formally implemented and the necessary measures are in place.

## **Paragraph 6.18**

Anglian Water supports the reference to the Lowestoft Flood Risk Management Project (LFRMP). Anglian Water is a partner in this project as addressing flood risk from all sources (pluvial, fluival and tidal) helps to ensure our wastewater network is more resilient for the future.

## **Paragraph 6.27**

Anglian Water welcomes reference to the relevant Local Plan policies and supplementary guidance that already address matters of concern to the local community such as encouraging the use of natural energy and resources including rainwater harvesting, which can help reduce demands for potable water and prevent surface water from inundating our wastewater network.

## **Page 20 – Aspects for improvement (Green)**

As a separate information note for Carlton Colville Town Council, it is noted that the plan references the need to ensure capacity of the sewage system. Whilst not directly relevant to the examination of the neighbourhood plan, the neighbourhood plan area is within the Lowestoft Water Recycling Catchment. Our Drainage and Wastewater Management Plan (DWMP) <https://www.anglianwater.co.uk/siteassets/household/about-us/dwmp/dwmp-1.pdf> sets out how wastewater systems, and the drainage networks that impact them, are to be maintained, improved and extended over the next 25 years to ensure they're robust and resilient to future pressures.

The DWMP outlines that we have a strong focus on removing surface water from the sewerage system through a range of mixed Sustainable Drainage Solutions (SuDS) and

traditional attenuation strategies such as building additional capacity through storage tanks to reduce the risk of escape from sewers. This will create additional volume to reduce storm impact. In the medium term to 2035 for the Lowestoft water recycling catchment, the priority will be network attenuation, and over the longer term to 2050 the strategy focuses on 25% surface water removal from our network with a preference for nature based solutions.

## David Haverson

As a resident of Low Farm Drive, I have a number of concerns about the development and am against the proposed plan:

1) Whilst Low Farm Drive will not be a vehicle access to the new estate, it will be a pedestrian route to the school. I have great concern that potential parents will end up parking in Low Farm Drive to drop off their children to school, causing a blockage to the residents. Furthermore, the alley way connecting Low Farm Drive and Shaw Avenue is heavily used by children and parents walking from the Dales estate to Carlton Colville Primary school, the potential added traffic in Low Farm Drive could increase the risk of a pedestrian being hit.

2) I am against the further development of green field sites and the countryside. Building a school directly at the end of Low Farm Drive removes the direct view of the countryside to the residents and removes our access to direct green space, which locals frequently use for recreational walks and bird spotting.

3) Furthermore, the loss of habitat is a great concern. Skylarks can be frequently spotted in the fields where the proposed development is located. Skylarks are named as a protected species under Annex 1 of Birds Directive (Directive 79/409/EEC) and classified in the UK as Red under the Birds of Conservation Concern 5: the Red List for Birds (2021). I note the distinct lack of reference to Skylarks and their loss of habitat in any of the relevant documents submitted as part of the Carlton Colville neighbourhood plan, such as

- [Habitats Regulations Assessment Screening Report](#)
- [Strategic Environmental Assessment Screening Report](#)
- [Landscape and Wildlife Evaluation](#) (2020)

4) I am deeply concerned about the potential increased risk of flooding due to the proposed development. The fields at the end of Low Farm Drive, contain a number of drainage ditches, as shown Figure 4.8. These will be replaced by large scale hard substrate which will exacerbate the flooding risk to Carlton Colville. The residents do not want to see occurrences of flooding, such as the repeated flooding on Secret's Corner (as already identified in Section 6.17), happening on our street as well.

5) I am strongly against the addition of 900 proposed further dwellings. We already have trouble with anti social behaviour with children coming into the neighbourhood from neighbouring local estates. Despite an increase in police presence, the Council are still currently slow in their assistance with the problem, despite requests for help going back to 2022. What reassurances will there be that the council can control antisocial behaviour with

such an influx of new residents. The development plan talks about wanting to generate a community spirit, yet it can't protect the current one.

6) I am greatly concerned about the potential housing density of the site. If the new development ends up like Dale's estate, that would be a massive opportunity wasted. The Dale's estate is over-crowded, with properties on top of each other, tiny gardens which are overlooked by their neighbours, offering no privacy. Did the Covid lockdown not teach us the need to build gardens back into development plans. There is a distinct lack of both residential parking (take the example of a six bed house on Deepdale with one parking space) and no additional parking for non residents/visitors/delivery vans etc. Cars are constantly parked on side ways meaning I have to push prams into the road or my children cycle into on coming traffic as the paths are blocked. If the neighbourhood plan wants to build a spirit of community, then it needs to allow for residents to have visitors.

7) Given the current cost of living crisis, I question the economics of the proposed development. Currently, house prices of the Dale's estate are between £300-400k. Given the average salaries in Lowestoft are £25k, a dual income household is looking at a mortgage of £200k. Who is going to be able to afford to live in this new neighbourhood.

8) Continuing with economics, what stipulations are being put on the developers that developments of the school and local amenities will be developed first? For example, it would be a travesty for the houses to be built first and then the developers run out of money to finish the estate, meaning all the local benefits, such as the school and shops, that are promised are in fact not delivered. The local school system will not be able to handle an influx of 900 new dwellings (and associated school children) without additional school places. If this development goes ahead, the school will need to be guaranteed to be built first.

I do hope these concerns will be taken into consideration.

Kind regards

Dr Haverson

## Mutford Parish Council

Mutford Parish Council is disappointed that there is no reference in this draft policy to limiting or resisting a gradual merging with, or encroachment on, Mutford boundaries, which is something that our Neighbourhood Plan made clear that we/our residents wanted to avoid.

## National Gas (Avison Young)

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

### About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

### Distribution Networks

Information regarding the gas distribution network is available by contacting:

*\*email address redacted\**

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of

materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's 'Guidelines when working near National Gas Transmission assets' can be downloaded

here: <https://www.nationalgas.com/document/82951/download>

**How to contact National Gas Transmission**

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: *\*email address redacted\**

## National Grid (Avison Young)

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

### **About National Grid Electricity Transmission**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

### **Proposed development sites crossed or in close proximity to NGET assets:**

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

Please also see attached information outlining guidance on development close to NGET infrastructure.

### **Distribution Networks**

Information regarding the electricity distribution network is available at the website below:

[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.



Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

#### **How to contact NGET**

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: \*email address redacted\*

## National Highways

Thank you for your correspondence, received on 10 May 2023, notifying National Highways of the consultation under Regulation 16.

National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding the Carlton Colville Neighbourhood Plan, we have responsibility for the trunk roads A47 and A14.

National Highways sent comment previously, in response to the Carlton Colville Neighbourhood Plan Regulation 14 Consultation Response.

With this current consultation under Regulation 16, we have reviewed different policy details within the Carlton Colville Neighbourhood Plan 2020-2036. The area and location that are covered by this Neighbourhood Plan is remote from the SRN. Consequently, these draft policies set out are unlikely to have an impact on the operation of the trunk road and National Highways offer No Comment.

We do not have any more comment of this.

# Natural England

Thank you for your consultation on the above dated 10 May 2023.

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 the Carlton Coville 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.

## **Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities**

### **Natural environment information sources**

The Magic website (<http://magic.defra.gov.uk/>) 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), 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 here <http://www.nbn-nfbr.org.uk/nfbr.php>.

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>. 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 <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>.

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 website <http://magic.defra.gov.uk/> and also from the LandIS website <http://www.landis.org.uk/index.cfm>, which contains more information about obtaining soil data.

### **Natural environment issues to consider**

The National Planning Policy Framework [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/807247/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf) sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/> 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.

### Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>), such as Sites of Special Scientific Interest or Ancient woodland <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>. 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 <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>) or protected species. To help you do this, Natural England has produced advice here <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals> 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 171. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land <http://publications.naturalengland.org.uk/publication/35012>.

### **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, 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. Examples might include:

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

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.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this <https://www.gov.uk/government/collections/planning-practice-guidance>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- 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).

## Optima Carlton Colville Ltd

On behalf of Optima Carlton Colville Ltd., I am writing to respond to the current public consultation exercise (Regulation 16) with regard to the submission version of the draft Carlton Colville Neighbourhood Plan (February 2023). My client is the developer which controls the land at Bell Farm, south of The Street, which is allocated for a residential-led mixed-use scheme through Policy WLP2.16 in the adopted Waveney Local Plan, and is currently preparing an application for outline planning permission for the development of the site. It is expected that the development of the site will be commenced and completed within the period covered by the draft neighbourhood plan.

The process of establishing the constraints and opportunities presented by the site is at an early stage and the preparation of a comprehensive set of reports and assessment is ongoing. Parameters are set by the Waveney Local Plan and Policy WLP2.16 in particular, some of which are listed in the introduction to the neighbourhood plan. The intention of the plan to guide and shape the form of the scheme for the land to the south of The Street is understood, and the use of local knowledge to create a “blueprint” for the site is appreciated. The four objectives in Chapter 3 are clear and straightforward, and it is expected that they will be delivered by the scheme for the land to the south of The Street.

Unfortunately, the plan has been prepared without any engagement with either the landowner or developer and the submission version of the plan represents the first opportunity for them to be involved in the creation of the neighbourhood-level planning policies that will be used in the consideration of the forthcoming application for outline planning permission. Many elements of the draft plan seek to implement components of existing planning policy from the national and district levels, but there are some areas where requirements relate to local circumstances and are not supported by the evidence base, appearing to be derived from assumptions or conjecture.

Policy CC1: High Quality Design is supported by the developer and is a good example of a neighbourhood plan policy that joins up existing planning policy at national level and district level to ensure that any development in Carlton Colville (and not just to the south of The Street) meets the required standards to be “high quality”. The seven criteria in part A and the four elements encouraged by part B set standards without imposing unnecessary restrictions of the form of development, whether it is a single house or a strategic-scale scheme for 900 new homes. There is flexibility and room for manoeuvre that allows details of a scheme to be assessed in accordance with the policy without imposing a stringent requirement that could lead to a lower quality scheme which focuses on simply addressing the condition. For example, section ii of part B encourages development to be “set back from roads and boundary treatments are at a low level, creating an open feel” but does not exclude the potential for a tighter public realm that is included in the Neighbourhood Plan

Design Code at sections 4.2.2 (Street Types) and 4.2.5 (Shared Spaces) where it would be appropriate, would help to deliver placemaking and would enhance high quality design. The status of the Design Code is considered below, but it would be useful if it could be mentioned in Policy CC1 because the sole purpose of the document is to deliver high quality design.

Conversely, a lack of purpose and the failure to link it to an evidence base makes Policy CC2: Particular Views difficult to use and potentially obstructive or potentially pointless. It introduces four views that are described as “cherished” and requires that they shall be preserved. Unfortunately, although they are described in the supporting text (paragraphs 4.45 to 4.48) and three of the four views are supported by photographs, there is no detailed assessment of the views and their status, nor is there any understanding of how they relate to the land south of The Street even though it is allocated for built development in the local plan. The developer is currently preparing a Landscape and Visual Impact Assessment (LVIA) that will be submitted as part of the forthcoming application for outline planning permission and will be part of the pack of information that will be drawn together to frame the form of development that will be proposed. While View 3 and View 4 are within the land allocated for development in the local plan there is not, as yet, any confirmation that these are views that should be preserved or that they are the most valuable views – their preservation appears to be based solely on local opinion and is unrelated to any technical assessment of the potential visual impact of built development to the south of The Street, a zone of theoretical visibility, the sensitivity of receptors and their susceptibility to change. Reference is made to the significance of heritage assets, but no justification is provided; for example, paragraph 4.13 and Figure 4.9 discuss the setting of the scheduled ancient monument (within the site) and Holy Trinity Church (to the south) and the need to preserve the view from the former to the latter but there is no explanation as to why. Figure 4.9 shows the location of the two heritage assets but also includes an ellipse coloured brown that fills the western side of the site which has no status or explanation in the text or the diagram, although it appears to be the genesis of View 3 and would deliver intervisibility between two unrelated heritage assets without explaining its purpose or why a policy is needed to ensure that it is preserved.

The same principle applies to View 4 and without an LVIA to assess the value of views from and, probably more importantly, views towards the higher ground, there is no explanation or purpose for preserving an undefined view. It should also be noted that Figure 4.21 shows all four views as a single arrow point towards a potential feature of interest, offering a vague interpretation of a view that is deemed important enough that it should be preserved, regardless of any allocation for land use in the local plan or any assessment of the value of the view. Without any understanding of the views, the policy is not fit for purpose: without any mechanism to enable precision in its implementation, it could veer anywhere between preventing development across most of the land allocated for development by Policy WLP2.16 and failing to protect anything apart from the four narrow



corridors shown in Figure 4.21. If the policy cannot be used to assess proposals for development, it should be deleted.

Without any explanation, the land south of The Street is divided into two parts in Figure 5.1, Figure 5.2 and Figure 5.3, labelled “B” to the west and “C” to the east. Area “B” may have a relationship with the brown ellipse from Figure 4.9 and the desire to preserve View 3 in Policy CC2, but this is not expressed by the draft plan and serves to highlight the inherent vagueness that makes Policy CC2 simultaneously hazardous and redundant. The third bullet point in paragraph 5.9 is the point where the designations are revealed, with “B” defined as a country park and “C” being the “proposed Bell Farm development”. Without any assessment of the site to justify the location of any of the allocated land uses, it is not appropriate for the neighbourhood plan to start dictating the form of development on a drawing showing the main routes within Carlton Colville. Figures 5.1, 5.2 and 5.3 should be amended to show the land subject to local plan Policy WLP2.16 and the allocation for residential-led mixed-use development as a single site, reflecting the requirement in the local plan for a masterplan to be informed through ongoing engagement with the community and submitted as part of the application for outline planning permission.

The figures and accompanying supporting text lead to Policy CC3: Key Movement Routes and the desire to add additional routes to those proposed by the East Suffolk Cycling & Walking Strategy is understood and the neighbourhood plan is the ideal mechanism to add local detail to the district-wide strategy. However, once again, the draft plan jumps straight to a requirement without any assessment of the land to the south of The Street or any understanding of whether the Key Movement Routes can be delivered or should be delivered in the positions shown. At the most basic level, there is nothing in the plan’s evidence base to indicate that the connections across the site boundary that would deliver routes R1, R2 and R3 can be created at the points shown – this work is still to be undertaken by the developer and is yet to be concluded. The flexibility of Policy CC1 is missing and Policy CC3 and Figure 5.3 work together to dictate the form of development, adding control where it is not needed and harming the quality of the scheme for the site: there is no reason why routes R1, R2, R3 and L30 should meet in the area reserved for surface water attenuation (under the annotation of “C”) and away from the hub created by the grouping of the neighbourhood facilities (school, nursery, shops and care home) that is placed much further to the west by the Design Code; there is certainly no reason why route R3 should cut through the scheduled ancient monument; it is questionable as to whether the routes shown in Figure 5.3 meet the requirement in part D of the same policy to be convenient and attractive; none of the routes shown in Figure 5.3 are accommodated by the Design Code for the site that has been

prepared by the town council as part of the neighbourhood plan. Part A of Policy CC3 should be modified to confirm that Figure 5.3 is indicative within the land allocated for development by Policy WLP2.13 and that it does not supersede the requirement for a

masterplan to be created (which will be based on a thorough assessment of the site) and that connections will only be delivered where it is possible to do so.

Parts C, D and E should also be reconsidered to review their relationship with Policy CC8: Carlton Colville Country Park and Policy CC6: Dark Skies and Lighting, with the latter confirming that dark skies are a characteristic of the area covered by the neighbourhood plan but adding a caveat that highway lighting will only be supported where it is required for reasons of highway safety. Part C requires that development should not harm the safety or accessibility of key movement routes, part D finds that major development proposals must ensure that pedestrian and cycle routes are safe and attractive, while part E states that “where major development is adjacent to open countryside, layouts should provide walking and cycling access around the perimeter of the development”. Although part E is only partially delivered by the Design Code, routes around the countryside edge will need to be lit to achieve compliance with parts C and D, creating a clash with Policy CC6 and potentially introducing a negative impact that has not yet been considered by an LVIA. Furthermore, the “star gazing area” included in Figure 7.1 and Policy CC8 will be of no value if the country park is crossed by lit paths. The need for the evidence base to back up the policies is discussed above, but without an LVIA or a lighting assessment to provide further input, at this stage it appears that three policies seeking two different outcomes is a matter that can only be addressed by modifying the subsections of Policy CC3 to remove the clash.

Appendix A sets out extracts from the East Suffolk Cycling and Walking Strategy (October 2022), but is only a partial list: the Site Allocations Recommendations are missing and the direct relationship between the local plan and the proposals in the neighbourhood plan are therefore missed. A partial appendix is of little use to Policy CC3, therefore the appendix should either be deleted or expanded to include extracts of pages 201 to 203 (including Oakes Farm), even though the routes shown in the district-wide strategy do not match the Key Movement Routes proposed by the neighbourhood plan – it may be appropriate to add to the supporting text to explain the differences and why elements of the district’s strategy are not considered appropriate when revisited at the local level.

Policy CC5: Biodiversity Net Gain and Wildlife-Friendly Development is supported and is another good example of providing flexibility so that development proposals can deliver high quality schemes without being forced into following prescriptive rules. All four elements can be integrated into the forthcoming scheme for the land south of The Street.

Chapter 7 replicates the list of community facilities secured by Policy WLP2.16 in the local plan, adding useful extra detail. However, the suggested locations for the facilities are not supported by any evidence and contradicts the town council’s own Design Code for the site and the illustrative masterplan that accompanies Policy WLP2.16. If paragraphs 7.2 to 7.15 provide advice, they should be removed from the neighbourhood plan and inserted into the Design Code, which should then be modified to reflect them. If they are requirements, they

pre-empt the assessment of the site and the creation of a masterplan as part of the forthcoming application for outline planning permission, adding a level of detail that is not supported by the evidence base, meaning they should be deleted. Perhaps most significantly, the supporting text matches the Design Code and seeks to place the community facilities close to Bell Farm, on the edge of the countryside and therefore close to the vehicle entrance, which is described as being “in the heart of the community rather than at the edge” whilst Policy CC7: Community Provision at Bell Farm Allocation looks to place the community facilities in the heart of the development. Whilst this might match Figure 5.3 (discussed above), it does not match the supporting text or the Design Code and should be modified to reflect the town council’s ambitions for the scheme, clarifying the relationship that is sought with the existing community, Bell Farm and the countryside edge.

Of course, the re-written policy needs to accommodate an element of flexibility and cannot dictate the form of development unless it is based on a detailed assessment of the site. As noted above, this process is ongoing and the town council may wish to consider if there is any benefit in including subsection i of part A to the policy when it simply replicates a small part of Policy WLP2.16. Furthermore, subsection ii of part A introduces a minimum area for the allotments that is not included in the local plan policy and while the explanation of the calculation at paragraph 7.6 provides the background and evidence that is sought for some of the items discussed above, the level of detail provided is part of a much wider discussion during the assessment of the site and a matter that needs to be agreed with the developer, the district council and – if it is to address a shortfall across a wider area, as the text proposes – Lowestoft Town Council, who are currently preparing their own neighbourhood plan and may not be reliant on Carlton Colville picking up cross-border shortfalls in provision. The level of detail is helpful, but like the other elements of the community provision, it should either be relocated to the Design Code or be omitted as a matter that is to be agreed at the masterplanning stage.

Paragraph 7.17 states that “whilst the principles provides a detailed list, it is recognised that there must be flexibility in what is delivered to meet the overall objectives” and Policy CC8: Carlton Colville Country Park requires adherence to the principles set out in Figure 7.1 (which is, in turn, confirmed to be illustrative by paragraph 7.19). The important aspects of the country park are noted and the flexible policy is supported; each part will be considered within the context of the assessment of the wider site and the deliverability and desirability of each element will be considered within the preparation of the masterplan.

The Policies Map provides a pictorial summary of the policies discussed above and therefore needs to be updated to accommodate responses to these representations – the arbitrary subdivision of the land south of The Street, the positions of the views and the positions of the Key Movement Routes. The map includes elements of detail that are not yet supported by an assessment of the land allocated for development through Policy WLP2.16, setting parameters that are not supported by the evidence base; it may be more successful to

simplify the plan by omitting some of these detailed elements and only showing the principles sought by the neighbourhood plan.

Finally, the status of the Design Code for the site needs to be clarified. The final version was published in March 2020, one year after Policy WLP2.16 was formally adopted as part of the local plan and one year before the Regulation 14 version of the neighbourhood plan was presented for public consultation. The code states that it will support policies in the neighbourhood plan and it has been used in the first stages of the assessment of the site as the developer begins to put together a detailed understanding of how the development of the site can be delivered within the parameters set by the allocation in the local plan. However, it appears that some elements of the code are retained and some have been abandoned in favour of different ideas – Figure 7 showing topography and Figure 9 showing existing hedgerows and water features are combined into Figure 4.8 in the neighbourhood plan, whereas Figure 4.21 (views of importance) and Figure 5.3 (Key Movement Routes) are new and are not accommodated by the Design Code. It is understood that reference to the Design Code was removed from the plan after the Regulation 14 stage and it is omitted from the evidence base at the submission (Regulation 16) stage, but it remains on the town council's neighbourhood plan website and its assessment of the site forms the basis of paragraphs 4.3 to 4.43 in the neighbourhood plan, meaning that it is an integral part of the plan even if it is not mentioned. To omit it completely makes a substantial hole in the plan's already thin evidence base and leaves many elements of the policies as if they appear out of nowhere, which is highlighted by the issues caused by the policies that seek to depart from the framework that it creates (Policy CC2 and Policy CC3), in that they are not based on an assessment of the site and create a clash with aspirations elsewhere in the plan. In short, the status of the Design Code must be clarified by the neighbourhood plan, either leading to a re-assessment of the policies that are derived from it (Policies CC1, CC6, CC7 and CC8) so that they reflect that the position set by the code no longer exists, or the re-drafting of the policies that clash with it (Policies CC2 and CC3) so that the neighbourhood plan can work as a whole.

In general, the main elements of the Carlton Colville Neighbourhood Plan are supported by Optima Carlton Colville Ltd. and they can confirm that the emerging scheme for the residential-led mixed-use development of the land south of The Street will be in compliance with the ambition to secure a high quality scheme in Policy CC1, delivering the community facilities sought by Policies CC7 and CC8 at the same time as ensuring the mitigation of potential impacts sought by Policies CC4, CC5 and CC6 is integrated into the proposal. The assessment of the site is ongoing and elements of the forthcoming application for outline planning permission are starting to come together, beginning the process of understanding the opportunities offered by the site in the context of the constraints that already exist. Local Plan Policy WLP2.16 requires that the application for outline planning permission includes a detailed masterplan that is informed by ongoing engagement with the community and it is expected that this process will commence later this year. In the

meantime, the land to the south of The Street can help to achieve sustainable development in Carlton Colville in the period to 2036 and beyond, therefore the developer would welcome the chance to meet with the town council to discuss the detailed assessment of the site and the creation of the reports and assessments that will deliver a masterplan and form part of an application for outline planning permission for the development of the site.

In the meantime, I trust that you will find these representations to be duly made and that you will take them into consideration when the draft plan is independently examined. The same information has been submitted via the consultation portal on the district council's website, although in a different format that reflects the structure presented by the online submission. I trust that you will consider both submissions as a whole but if you have any comments or queries, or if you would like any additional information to clarify the points set out above, please do not hesitate to contact me at the above address.

# Suffolk County Council

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Carlton Colville 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 1990. The basic conditions are:

1. having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan;
2. the making of the neighbourhood plan contributes to the achievement of sustainable development;
3. 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); and
4. the making of the neighbourhood plan does not breach, and is otherwise compatible with, retained EU obligations.

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

## *Location of the new proposed Primary School differing from the Local Plan*

SCC welcomes the changes that have been made to the plan following our Pre-Submission response, and the subsequent meetings held with the town council.

SCC has some concerns with the stipulations set out in part i. of Policy CC7 regarding the locations of the facilities at the Bell Farm development site, in particular the new primary school.

To err on the side of caution, SCC would recommend not being specific to the location of the new primary school as part of the Bell Farm site, as this could cause issues at the application stage with being overly restrictive.

The point raised in the Consultation Statement regarding trying to avoid repeating and/or exacerbating the traffic issues at the current school are noted.

SCC would recommend that this policy should be encouraging these locations of these facilities to be accessible by sustainable means of travel, i.e., by walking and cycling. As this new primary school will be focused on meeting the needs of children mostly within the new development, but also within a close proximity outside of the development, there should be little need for single occupancy vehicular traffic to take children to and from the school.

The adopted Waveney (East Suffolk) Local Plan refers to the large catchment area of the existing Carlton Colville primary school, and that it is located some distance from the main built-up areas of the town, leading to large volume of school traffic as parents have to drive their children to school.

Therefore, in order to endeavour to reduce this occurring again with the new primary school, Policy CC7 should be seeking to encourage sustainable travel to school, and to the other facilities of the development, and to follow Chapter 9 of the NPPF by promoting sustainable transport.

Therefore, SCC would recommend that Policy CC7 part i. is amended as follows:

“i. The following uses are well designed, and located in a way that is accessible by active and sustainable modes of transport, such as by walking and cycling together in the heart of the development, rather than at the countryside edges: [...]”

## Suffolk County Council Archaeological Service

Thank you for sending over the Carlton Colville NP. I've looked over the plan and with regards to heritage it is well thought out and put together. The History and evolution of Carlton Colville is well researched, and it is nice to see that the Suffolk Heritage Explorer has been used here and it is good to see the inclusion of Non-designated Heritage Assets in section 2.6.

With regards to below ground heritage, archaeology is mentioned in relation to the archaeological potential of the Bell Farm site and the Oakes Farm site. The need for archaeological evaluation across these sites is specifically stated in section 4.14.

In addition, I would encourage the addition of a note within the Heritage section of chapter 4, along the lines of:

"Suffolk County Council Archaeological Service (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 Waveney (East Suffolk) Local Plan (2019) are met. SCCAS as advisors to East Suffolk District Council would be happy to advise on the level of archaeological assessment and appropriate stages to be undertaken."

Having something along the lines of the above would provide clarity to developers for any future development sites and, would ensure that Objective 1 in section 3.3 of the NP are met with regards to any below-ground heritage. In addition to this, the plan could also highlight any level of public outreach and public engagement that might be aspired from archaeology undertaken as part of a development project, as increased public understanding of heritage sites is an aspiration of the NPPF.

In section 2.9 we would welcome the inclusion of a statement along the lines of "The HER is maintained by Suffolk County Council Archaeology Service and the HER team can be contacted and consulted here <https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/the-historic-environment-record>. Publicly available information is also available via the Heritage Explorer <https://heritage.suffolk.gov.uk/>".

Additionally, SCC Archaeological Service have been reviewing Farmsteads throughout Suffolk, as part of an ongoing project funded by Historic England. The NP group may wish to consider whether the information from the Suffolk Farmsteads Project (<https://heritage.suffolk.gov.uk/farmsteads>) would add any details or information to the Non-Designated Heritage Assets, entries from the project can be seen via the Suffolk Heritage Explorer (<https://heritage.suffolk.gov.uk/>).



### Site allocations:

Land south of The Street, Carlton Colville/Gisleham (Bell Farm development): Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

Oakes Farm: Due to high archaeological potential we have advised pre-application archaeological investigations are undertaken prior to submission of a planning application for this site to ensure preservation in situ of any significant archaeological remains and to determine the suitability of the site for development as required by NPPF. To date, pre-application archaeological works have commenced on the northern portion of the site which have comprised geophysical survey and trenched archaeological evaluation is due to follow. SCCAS would recommend pre-application archaeological investigations on all parts of the site which have not yet been subject to archaeological investigation. We would be happy to discuss the requirements on request. Any application submitted for this site will need to include the results of the pre-application works and details of proposed archaeological mitigation.

## Suffolk Wildlife Trust

Thank you for once again providing the opportunity to comment on the Carlton Colville Neighbourhood Plan.

We are pleased to see that our previous comments (Letter Dated 18th May 2022, RE: Carlton Colville DRAFT Neighborhood Plan), which highlighted many positives within the draft plan as well as suggesting improvements to further benefit wildlife, have been taken on board with the plan now referencing target species for enhancement measures as well as noting that a measured net gain of at least 10% should be delivered by new development projects within the district.

We have no further comment and believe that wildlife and the environment have been thoroughly considered with the Carlton Colville Neighbourhood Plan at all stages and with the most recent additions, sets a good example for how a neighbourhood plan can consider wildlife and biodiversity.

Please do not hesitate to contact Suffolk Wildlife Trust should you require further advice.