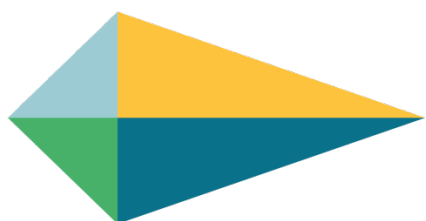


Responses to Easton Neighbourhood Plan

Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 10 November 2023 to 19 January 2024

February 2024



EASTSUFFOLK
COUNCIL

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What is the purpose of this document?

Easton Parish 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.

The consultation was due to close on 22 December 2023, however due to the publication of the revised National Planning Policy Framework the consultation deadline was extended until 19 January 2024.

This document contains all representations received during the publicity period of 10 November to 19 January 2024.

Since the consultation closed Anglian Water and the Environment Agency responses contained in this document have been updated. The updated Anglian Water and Environment Agency responses can be viewed in the 'Updated Responses to Easton Neighbourhood Plan' document published on the Council's Easton Neighbourhood Plan webpage.

Anglian Water (original response)

East Suffolk Council Note on Original Anglian Water Response

Since the consultation closed the following Anglian Water response has been updated. The updated Anglian Water response can be viewed in the 'Updated Responses to Easton Neighbourhood Plan' document published on the Council's Easton Neighbourhood Plan webpage.

Original Environment Agency Response

Anglian Water made a representation to the Reg.14 pre-submission draft Easton Neighbourhood Plan. We welcome the reference to our representation in the consultation statement and the associated changes to Policy ETN2 Land south west of Wickham Market Road to ensure that matters regarding connection to and capacity of our network can be considered through pre-planning engagement with Anglian Water, which is referenced by the modifications to the policy in criterion 8.

Following our earlier representation, Anglian Water wishes to confirm that our Drainage and Wastewater Management Plan 2025-2050 (DWMP) was published at the end of May 2023, and has informed the preparation of our PR24 Business Plan 2025-30 investment priorities, which is now with our regulators for review and determination by the end of the year.

Our DWMP confirms that there are no long term strategies for Easton Water Recycling Centre (WRC) and catchment, as the projected growth in population to 2050 rises to 240 from 202 in 2021. As explained in our Reg 14 representation, Easton WRC is a descriptive works, which is a small facility with a descriptive permit which applies when the WRC is serving a population less than 250 with no trade effluent accepted at the works.

There is no requirement for flow measurement at a site of this size. Compliance with the permit is based on regular inspection by the Environment Agency. Future development that would exceed capacity of the WRC could incur significant investment for infrastructure if it is considered that WRC improvements would be needed to be delivered through a future business planning process and would fall outside of developer control. Depending on the cumulative impact any intervening windfall developments in the village, the neighbourhood plan should recognise there may be a risk in terms of getting the necessary investment in place in a timeframe that's viable for the development on this site should it result in a population increase above 250 population equivalent being served by the WRC. This approach is reinforced by Objective 9 to minimise the impact of development on the capacity of essential infrastructure.

East Suffolk Council

General Comments

This is a well written neighbourhood plan that presents the vision for the neighbourhood area. The plan contains well written policies covering a wide range of topic areas to reflect their local importance. Local engagement and a good evidence base support the Neighbourhood Plan. Please see detailed comments from East Suffolk Council (the Council) below.

For the avoidance of doubt, the Council has not provided comments on the draft Neighbourhood Plan since the regulation 14 consultation (4 February – 20 March 2023), other than in relation to the submission checks. We thank Easton Parish Council for engaging constructively with us throughout the preparation of the Neighbourhood Plan. Easton Parish Council had intended to share a draft version of the Neighbourhood Plan with us for informal comments prior to submission. However, it is acknowledged that the understandable reason this did not occur was a result of the significant delay in receiving Locality grant funding.

On the 19 and 20 December 2023 the Department for Levelling Up Housing and Communities (DLUHC) published a revised National Planning Policy Framework (NPPF). References to the September 2023 version of the NPPF and any of its provisions should therefore be updated, such as:

- Paragraph 5.2 – update date of published NPPF;
- Paragraph 8.19 – update reference to NPPF paragraph 174(d) to 180(d);
- Paragraph 8.23 – update reference to NPPF paragraph 102 to 106;
- Paragraph 8.24 – update reference to NPPF paragraphs 101 and 102 to 105 and 106;
- Paragraph 8.25 – either remove copied NPPF text, or update paragraph numbers 101 and 102 to 105 and 106; and
- Paragraph 8.26 – update reference to NPPF paragraph 102 to 106.

‘Neighbourhood’ spelt incorrectly in header.

On page 4, ‘foreword’ spelt incorrectly.

References on page 6 and paragraph 1.11 to ‘East Suffolk District Council’ should be amended to ‘East Suffolk Council’.

Introduction

This section provides a useful summary of the consultation and engagement activities undertaken throughout the preparation of the Neighbourhood Plan.

Page 11, figure 5, ‘questionnaire’ spelt incorrectly.

The Plan

This section provides a useful and concise summary of the Neighbourhood Plan's areas of focus, its relationship with other development plan documents, and the environmental assessments undertaken.

About Easton

This section provides an interesting summary of the history of Easton, providing useful context to the Neighbourhood Plan.

Easton Today

Paragraph 4.6 sets out a definition for ancient woodland, which is not necessarily incorrect. However, in having regard to national policy it is recommended this definition be replaced with the definition set out in the NPPF Glossary, which reads "An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS)."

Paragraph 4.7 refers to landscape character types and areas as non-statutory landscape designations. This is incorrect. These are landscape character types and areas as identified by various landscape character assessments; they are not designations, statutory or otherwise. There is further inconsistency in this paragraph in that the source material is not identified for the first mentioned landscape character types (they are from the Suffolk County Landscape Character Assessment), and then the Suffolk Coastal LCA is quoted without stating which Landscape Character Areas are being referenced. This paragraph needs tidying up and properly referencing.

Planning Policy Context

This section provides a useful summary of the relevance of the key planning policy documents to the Neighbourhood Plan.

In paragraph, reference to 'SLP9.2' should be amended to 'SCLP9.2'.

Vision and Objectives

The vision and objectives have been identified through community engagement, have informed the subsequent planning policies, and are supported.

Policies Map

Figures 22 (whole parish) and 23 (zoomed in on settlement boundary) comprise the policies map for Easton.

The policies map reference to the Local Green Spaces policy requires updating to 'ETN7', rather than ETN6.

The proposed Non-designated Heritage Asset (NDHA) for 'Stone wall, The Street, car park and adjacent land' (number 21) is not shown on the policies map. Provided the

identification of the 'Stone wall, The Street, car park and adjacent land' as an NDHA is accepted, this must be corrected.

If it is agreed that NDHA 20 should be split into two NDHAs (one for each heritage signpost), as per the comment below relating to policy ETN8 (Non-Designated Heritage Assets), it must be reflected on the policies maps.

The boundary of the proposed site allocation differs across the submission documents. In the April 2018 AECOM Site Assessment Report (see site 516, page 19) the site boundary follows the shape of the site submitted to Suffolk Coastal District Council (now East Suffolk Council) through the Suffolk Coastal Local Plan call for sites process. However, the site boundary is altered in the submission Neighbourhood Plan (page 32) and the AECOM Strategic Environmental Assessment (SEA) (page 16). Consequently, the Neighbourhood Plan amends the settlement boundary, which is therefore not the same as shown on the Suffolk Coastal Local Plan policies map. We recommend altering the site allocation boundary with regard to comments under policy ETN2 (Land South-west of Wickham Market Road). Minor adjustments to the Easton settlement boundary are permissible, as set out in Local Plan policy SCLP3.3 (Settlement Boundaries).

Housing Policies

Policy ETN1 (Housing Development)

It is not clear how the Neighbourhood Plan provides approximately 44 dwellings, as set out in the first sentence of policy ETN1. However, irrespective of this, the Neighbourhood Plan plans positively for housing growth through the inclusion of a site allocation for approximately 12 homes (policy ETN2). While this is less than the minimum 20 dwellings expected of the Neighbourhood Plan as set out in Local Plan policy SCLP12.1, we cannot compel a Neighbourhood Plan group to prepare a Neighbourhood Plan nor to address housing in the Neighbourhood Plan. Local Plan policy SCLP12.1 also notes that "should the housing growth identified for Neighbourhood Plans not be delivered, the Council will address this through a future Local Plan review". Thus, the provision of fewer homes than set out in Local Plan policy SCLP12.1 is not an issue of general conformity.

Policy ETN1 appears to address two separate issues, housing numbers and the conversion of agricultural buildings to dwellings, and it is not entirely clear why this is the case. The supporting text focusses on the first element of the policy, namely the matter of housing numbers, but does not provide supporting text relating to the conversion of agricultural buildings to dwellings. While the policy does not necessarily need supporting text that relates to the second part of the policy (conversion of agricultural buildings to dwellings), it is recommended. We recommend that policy ETN1 be split into two policies, the first dealing with housing numbers, and the second with conversions of agricultural buildings to dwellings.

Policy ETN1 includes reference to the draft Rural Development Supplementary Planning Document (SPD), which is currently out for public consultation (15 November 2023 – 10 January 2024) and can be viewed here:

<https://eastsuffolk.inconsult.uk/DraftHESPD2023/consultationHome>. We very much support reference being made to the draft SPD in the Neighbourhood Plan. However, we consider such references to relevant documents should be set out in the supporting text rather than the policy itself. This aligns with our above comment regarding splitting policy ETN1 into two policies; One policy to address housing numbers, and the other conversion of agricultural buildings to dwellings.

The elements of Policy ETN1 that relate to conversions of agricultural buildings to dwellings, while different in some respects, are considered in general conformity with policy SCLP5.5.

Local Plan policy SCLP5.5: 'Conversions of Buildings in the Countryside for Housing' relates to the conversion of agricultural buildings to dwellings and should therefore be referenced in the textbox titled 'Relevant Suffolk Coastal Local Plan policies' below policy ETN1.

Policy ETN2 (Land south-west of Wickham Market Road)

Policy ETN2 allocates land for approximately 12 dwellings. The Council recognises Easton Parish Council's hard work and dedication in seeking to address housing need in the village. However, there are a number of matters which merit consideration in relation to whether the proposed allocation contributes to the achievement of sustainable development and has regard to national policy in its current form. The Council considers that amendments to the policy and site allocation boundary are necessary to meet these basic conditions.

An operational employment use (workshop) straddles the northern site allocation boundary, with the largest workshop building sitting north of the site allocation, and the access road, parking/material storage area and smaller workshop building lying within the site allocation. Policy ETN2 is clear in its intention to formalise and improve the parking arrangements for the workshop, as set out in criterion 7. The workshop is home to Suffolk Welding and Fabrication Limited, a use which understandably generates noise and traffic movements, which could potentially be of an unacceptable level to future residents of the proposed allocation and future users of the open space (ETN2 criterion 1) and equipped area of play (ETN2 criterion 2), who will of course primarily be children.

NPPF (December 2023) paragraph 193 makes clear that existing businesses should not have unreasonable restrictions placed on them as a result of development permitted after they were established, and that applicants, or 'agents of change', should be required to provide suitable mitigation.

The Council therefore considers it necessary to amend the site allocation boundary in order to ensure policy ETN2 contributes to the achievement of sustainable development and has regard to national policy. The site allocation boundary should be extended north to incorporate all of the land associated with the workshop, and extended south to the existing

hedgerow to ensure that the development layout can be designed to avoid unacceptable residential amenity impacts on future residents arising from the potential continued use of the workshop. It will have to be confirmed whether this amended site area falls within the same ownership as the land proposed for allocation and if it is available for allocation. The Council also considers it necessary that policy ETN2 be amended to require development to avoid unacceptable residential amenity impacts. These necessary changes do not seek demolition, removal, or discontinuance of the workshop; However, such a change would be a potential option in developing the site.

Residential amenity is just one of many important considerations. Other important considerations relate to the ability of the site to accommodate the proposed quantum of development (approximately 12 dwellings) at the desired scale (1 and 2 storeys to minimise impact on landscape - ETN2 criterion 4), alongside open space (ETN2 criterion 1), an equipped area of play (ETN2 criterion 2), the potential continued use of the workshop and formalised parking area (ETN2 criterion 7), SuDS (ETN2 criterion 8), and on-site Biodiversity Net Gain, whilst locating the dwellings as far away from the workshop as possible. The aforementioned necessary changes to the site allocation boundary and policy will help ensure these policy requirements can be delivered.

The location of the open space between the street and homes offsets the development from the village entrance and reduces impacts on the Grade II listed Lowbarn Cottages' setting, and is thus supported in principle on heritage grounds

The preferred option set out on page 23 of the 'Conceptual Development Approach to Allocated Site' document identifies homes in close proximity to the workshop. In light of the above consideration of residential amenity impacts arising from the workshop and conversely the 'agent of change' implications, the Council questions whether it is appropriate for policy ETN2 to state that 'development should be guided by the Easton Conceptual Development Approach to Allocated Site document'. In its current form, policy ETN2 supports the preferred design option, which contradicts the Council's above recommendations in identifying homes in close proximity to the workshop.

To avoid the 'Conceptual Development Approach to Allocated Site' document becoming abortive work and in recognising the Parish Council's dedication to achieving high quality development on the site, the Council recommends that the 'Conceptual Development Approach to Allocated Site' document be referenced in the supporting text focussing on the identified constraints and opportunities that must be grappled with in coming to a design approach for the site.

Natural Environment Policies

Paragraph 8.2 refers to the 'Suffolk Coastal Landscape Character Appraisal', which should instead state the 'Suffolk Landscape Character Assessment'.

Paragraph 8.2 also refers to the 'Easton Character Appraisal', which I assume is reference to the 'Village Character Assessment' for Easton and should therefore be correctly referenced.

Paragraph 8.5 is copied text from the 'special qualities and features' of the Deben Valley landscape character area (Suffolk Coastal Landscape Character Assessment, page 37).

Paragraph 8.5 should therefore be moved into the above list of bullet points.

The third bullet point of paragraph 8.6 refers to Local Plan 'policy SCLP11.8 – Historic Parks and Gardens'. The policy reference should be corrected to read 'policy SCLP11.8 – Parks and Gardens of Historic or Landscape Interest'.

Policy ETN3 (Dark Skies)

Paragraph 8.11 recognises the importance of lighting design strategies for protecting biodiversity, which is welcomed. As well as impacting migrating birds, artificial lighting can also impact bats.

Local Plan policy SCLP10.4 (Landscape Character) expressly states that neighbourhood plans may include policies relating to protecting and enhancing landscape character, tranquility and dark skies.

Policy ETN4 (Protection of Landscape Character and Important views)

Paragraph 8.12 includes reference to the 'Easton Character Appraisal', which should be amended to the 'Village Character Assessment'.

Paragraph 8.12 includes reference to the policies maps, as 'figures 22 and 21'. This should be amended to 'figures 22 and 23'.

Paragraph 8.12 sets out that development proposals will need to demonstrate that they 'will not have a detrimental impact on the key features of the important views'. However, policy ETN4 (Protection of Landscape Character and Important views) sets out that development proposals shall demonstrate how they 'will ensure that there is no detrimental impact on the important views identified on the policies maps' and 'development will not have a detrimental effect on these key views or their key features'. It is therefore not clear whether development proposals must demonstrate no harm to the key features of relevant important view/s or no harm to the relevant important view/s in its/their totality. This inconsistency must be resolved, and the Council recommends it is resolved in favour of focusing on the 'key features' of the important views. The key features of each important view are listed in their descriptions, on pages 49-51. Local Plan policy SCLP10.4 (Landscape Character) requires developments to avoid 'significant adverse impacts'. We recognise that the Council previously advised Easton Parish Council, through the regulation 14 consultation, to remove reference to 'key features' from the policy. However, given the high bar applied to this assessment of harm against important views we consider that reference to 'key features' should be added back into the policy. We apologise for the inconsistency in our comments and any inconvenience caused by this.

On page 51, under key view 15, ‘forms’ should be removed.

Policy ETN5 (Recreational Disturbance Avoidance and Mitigation)

The last sentence of paragraph 8.13 refers to ‘residential disturbance’, which should be amended to ‘recreational disturbance’.

Reference to the Suffolk RAMS in paragraph 8.15 (in bracketed text) should be updated to Suffolk Coasts RAMS.

Policy ETN6 (Biodiversity and Geodiversity)

Paragraph 8.20 supports the creation of wildlife corridors and the linking and buffering the existing ecological assets, which is welcomed.

Reference in policy ETN6 to the ‘Easton Character Appraisal’ should be replaced with the ‘Village Character Assessment’.

Policy ETN7 (Local Green Spaces)

Policy ETN7 does not set out how development within a Local Green Space will be considered. Paragraph 107 of the December 2023 NPPF does not set out that development within a Local Green Space will be considered against NPPF Green Belt policy, simply that when drafting development plan policies for the management of development within Local Green Spaces such policies should be consistent with those for Green Belts. Policy ETN6 must therefore be amended to set out how development within the identified Local Green Spaces will be considered. In order to align such decision making with the NPPF provisions for the Green Belt, the following sentence should be added to the end of policy ETN7, ‘Development, other than for the enhancement of one or more Local Green Spaces, will only be supported in very special circumstances’.

The village green is identified as a Local Green Space. It should be noted that the green is identified in the Easton Conservation Area as an important Green/Open Space in the Summary of Character Features map on page 40 of the Conservation Area Appraisal.

The churchyard is identified as a Local Green Space. In the Local Green Space assessment of the churchyard on page 62 it is noted that the churchyard is owned by East Suffolk Council. This should be corrected as it is owned by the Church of England, but responsibility for the churchyard remains with East Suffolk Council.

Historic Environment and Design Policies

The clarification in paragraphs 9.7 and 9.8 about the difference between NDHAs and positive unlisted buildings within the Conservation Area is welcomed. They are not the same thing, but can be if a positive building is then assessed separately against ESC’s NDHA criteria as part of the planning process. An NDHA and a positive building engage different Local Plan policies and different parts of the NPPF which is why it is so important to avoid, as done here, confusion between the two. For the avoidance of doubt, it should be noted

either here or in the Appraisal of Non-Designated Heritage Asset supporting document that the greater the number of NDHA assessment criteria are complied with the greater the significance of the NDHA. This is important in considering the impact of development on NDHAs and their settings.

Policy ETN8 (Non-designated Heritage Assets)

In the 'relevant Suffolk Coastal Local Plan policies' box on page 70, 'SCLP5' should refer to 'SCLP11.5'.

The list of NDHAs in the NP is welcomed. It is clear that much thought and hard work has gone into producing such an extensive list of NDHAs. The inclusion of the village sign is also welcomed; NDHAs do not always have to be buildings and can include spaces and landscapes, for example.

NDHA 20 (Heritage signposts, Pound Corner, Kettleburgh Rd junction and Hacheston Road junction) addresses two heritage signposts in different locations. It would seem sensible to identify each signpost as a separate NDHA to avoid confusion.

In paragraph 9.14, reference to the 'Easton Character Appraisal' should be replaced with 'Village Character Assessment'.

In paragraph 9.14, reference to policy ETN3 should be amended to ETN4 as this relates to important views.

Policy ETN9 (Design Considerations)

Within criterion 14 of policy ETN9, 'be' should be removed from 'SCC will not be permit...'.

Policy ETN10 (Village Services and Facilities)

Reference in paragraph 10.4 to paragraph 9.1 should be amended to paragraph 10.1.

In paragraph 10.10, reference to the 'East Neighbourhood Plan' should be the 'Easton Neighbourhood Plan'.

Paragraph 10.17 notes that Water Recycling Centres (WRCs) 'serving the growth areas all discharge ultimately to coastal waters that are designated as SSSIs'. It is suggested that the text includes Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites.

Paragraph 10.18 notes that CIL has been charged in the former Suffolk Coastal area since 2015. This is correct. However, the CIL Charging Schedule has since been reviewed and adopted in June 2023. The new CIL rates came into effect in August 2023.

Paragraph 10.18 also states that 'The Parish Council currently receives 15 per cent of the Levy for relevant developments which will increase to 25 per cent on adoption of the Neighbourhood Plan.' To avoid confusion it would be helpful if this sentence could be

amended to clarify that the 25% Neighbourhood CIL rate will apply to developments that are granted planning permission after the Neighbourhood Plan is made and the development commenced.

Implementation and monitoring

Paragraph 11.3 suggests that once the Neighbourhood Plan is "made" the Parish Council will automatically receive 25% Neighbourhood CIL. This requires clarification. 25% Neighbourhood CIL is paid from developments that are granted planning permission after the Neighbourhood Plan is made and the development commenced.

Easton Design Guide

Section 2.2.5 refers to Special Landscape Areas, which have been disapplied and so should be removed. Reference to the 'East Suffolk Local Plan' should be amended to the 'Suffolk Coastal Local Plan'. Easton Park is not a registered park and garden; It is identified as a historic parkland by Local Plan policy SCLP11.8 (Parks and Gardens of Historic or Landscape Interest), and thus carries NDHA weight.

Appraisal of Non-Designated Heritage Assets

It is not clear from this document, or the relevant paragraphs of the Neighbourhood Plan (paragraphs 9.6-9.9) whether the East Suffolk Council NDHA assessment criteria have been used. If they have been used a simple sentence explaining this should be inserted to the Neighbourhood Plan and the NDHA Appraisal document.

Environment Agency (original response)

East Suffolk Council Note on Original Environment Agency Response

Since the consultation close the following Environment Agency response has been updated. The updated Environment Agency response can be viewed in the 'Updated Responses to Easton Neighbourhood Plan' document published on the Council's Easton Neighbourhood Plan webpage.

Original Environment Agency Response

Thank you for consulting us on the pre-submission plan for the Easton Neighbourhood Plan. We regret that at present, we are unable to review this consultation. We have had to prioritise our limited resource and must focus on influencing plans where the environmental risks and opportunities are highest.

For the purposes of neighbourhood planning, we have assessed those authorities who have "up to date" local plans (plans adopted within the previous 5 years) as being of lower risk, and those authorities who have older plans (adopted more than 5 years ago) as being at greater risk. We aim to reduce flood risk and protect and enhance the water environment, and with consideration to the key environmental constraints within our remit, we have then tailored our approach to reviewing each neighbourhood plan accordingly.

A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan.

Environmental Constraints

We have identified that the Neighbourhood Plan Area will be affected by the following environmental constraints:

Flood Risk

Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within the neighbourhood plan area. In particular, we note that the boundary does extend into areas of Flood Zones 2 and 3 of the designated main River Fynn.

On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. Nevertheless, we recommend the inclusion of relevant policies to cover the management of flood risk. Allocation of any sites and any windfall development delivered through the Plan period should follow the sequential approach. [National Planning Policy Framework](#) (NPPF) paragraph 167 sets this out.

Water Resources

Part of the neighbourhood plan area falls partly within an area subject to a memorandum on non-residential development set up by Anglian and Essex water companies. In this area they are not able to guarantee supply of water to any new economic development. This will likely impact the feasibility of any proposed or future economic development in your neighbourhood plan area.

Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.

New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your

area provides information on water availability and licencing policy at Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk).

Informatives

We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: [How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning](#)

Source Protection Zones

Your plan includes areas which are located on Source Protection Zones 3. These should be considered within your plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance:
<https://www.gov.uk/government/collections/groundwater-protection>

Historic England

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Jill Temperton

7.5 Please note that *“The adopted Local Plan (2020) makes provision for a minimum of 44 new homes in the parish between 1 April 2018 and 2036. The Parish Council questioned the number which had increased from 34 to 44 outside and beyond the Local Plan consultation given the size of the village, the limited level of services and the potential impact of the housing on the environment. However, this minimum requirement remains at 44 and has to be met in the Neighbourhood in the Neighbourhood Plan. At the time of writing, of the 44, 26 are completed. This leaves the Neighbourhood Plan to identify how and where at least 18 more new homes will be built”.*

In a village the size of Easton, with its large Conservation Area, this additional 10 properties that were added outside the official consultation period by East Suffolk Council. are posing great problems. It is apparent from the Reports by AECOM (para 7.7) and the Master Planning exercise (para 7.9) that the suitability for additional new properties to be built are very limited. The greenfield site for 10 new properties that has been put forward in the Neighbourhood Plan (para 7.9 Fig 25) is the only feasible option, but it is far from ideal due to its proximity to the Conservation Area, a row of Grade 2 Listed properties and limited safe pedestrian routes to the centre of the village (para 7.10-7.11). Finding another site for 10 properties would therefore be impossible in Easton.

Hopefully the new thinking by the Government about the use of greenfield sites for such properties will put a stop to such expansions in rural areas, with few facilities and no local transport.

I wish to request to be notified of ESC’s decision about the Examiner’s recommendations and future progress with the plan.

National Highways

Thank you for your correspondence, received on 11 November 2023, notifying National Highways of the consultation above.

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 Neighbourhood Plan area, National Highways have responsibility for the trunk road A14, part of the Strategic Road Network (SRN).

We have completed review of the supporting document titled, “Easton Neighbourhood Plan 2018 – 2036”, Submission Draft dated October 2023. It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications alongside the East Suffolk Council – Suffolk Coastal Local Plan. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.

The vision and objective, and proposed policies within this Submission Draft Neighbourhood Plan 2018-2036 would not have any predicted adverse impact on the Strategic Road Network (SRN).

We do not have any more comment of this.

Standing advice to the local planning authority

The Climate Change Committee’s [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Natural England

Thank you for your consultation on the above dated 10 November 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 this draft 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 and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

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

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website 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 from [the Association of Local Environmental Records Centres](http://www.localrecordscentres.org.uk/) .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². 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](#)³.

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.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ 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](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. 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.

⁴ <https://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here¹⁰](#)) or protected species. To help you do this, Natural England has produced advice [here¹¹](#) 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 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. 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 and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- 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 reduce impacts on wildlife.
- Adding a green roof to new buildings.

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

- Providing a new footpath through the new development to link into existing rights of way.

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met.

Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

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. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, 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).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

Paul Whiffin

Proposed below are two suggested amendments to the Easton Neighbour Plan (the Plan) for the following reasons:

I was encouraged to read, in the Public Rights of Way section 10.12, that opportunities to supplement the network of public footpaths, perhaps through landowners allowing permissive routes to be established, would be supported. I note that the Suffolk County Council's Green Access Strategy (2020- 2030) seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working.

Part of the vision statement in the Plan is for Easton to have safe roads. The Highways section 10.7 acknowledges the road through the village tends to form a rat-run for vehicles travelling between the A12 at Wickham Market and the A1120 at Earl Soham and that the wide and relatively straight roads can result in frequent occurrences of speeding. The Highways section 10.9 acknowledges the survey conducted which confirmed that speeding vehicles were at the 85th percentile. This resulted in the installation of the speed calming scheme in August 2022, but only in the village centre.

Speeding occurrences and the risk of accidents also remains very high within the plan boundary, outside of the village centre. In particular, speeding frequently occurs on Wickham Market Road, which has a limit of 60mph. There are a number of residences along Wickham Market Road that are within the plan boundary, most notably c15 houses around Home Farm and Glevering House (Figure 1: The designated Neighbourhood Plan area). There are no public rights of way or public footpaths within this area other than Wickham Market Road. The only way residents can link with the village or the wider area is by car, as it is not safe to walk along Wickham Market Road. This appears to be contrary to the plan's strategy to improve access for all and to support healthy and sustainable access between communities and services.

Furthermore, Policy ETN2 – Land south-west of Wickham Market Road section 5, recognises the need for a footway link and provision for a safe pedestrian crossing between the development site and the village primary school and the wider public rights of way network. In addition, Policy ETN9 Design considerations no.11, supports the inclusion of safe walking and cycling routes for new developments. As such the Plan appears to prioritise public footpaths for new developments at the expense of existing properties which would benefit from them.

Given the Plan's vision is to have safe roads, I believe a rolling rota of temporary speed activated signs (presumably within the village centre) as specified in Highways section 10.7, is insufficient and will not reduce the risk of an accident, particularly involving pedestrians

that do choose to walk along the 60mph stretch of Wickham Market Road that is within the plan boundary.

Given the above, I would propose the following changes to the Plan

1. The Public Rights of Way section should specify the locations at which the Plan would support additional public footpaths. This should include a public footpath which connects the houses at Home Farm and Glevering House to the village centre and its network of other footpaths.
2. The Highways section should include additional speed controls outside of the village centre, in particular, by the residential areas on Wickham Market Road that are within the plan boundary. This could include a proposal to limit the speed in the residential area to 30mph or the addition of traffic calming measures similar to those in the village centre.

Suffolk County Council Archaeological Service

Thank you for consulting SCCAS on the Easton Neighbourhood Plan. Overall it is good to see that heritage has been given significant thought and consideration in the plan.

It is really good to see that a public outreach event by SCCAS has been referenced in section 1.18-1.19. Increased public understanding of heritage sites is an aspiration of the NPPF and the plan could also highlight any level of public outreach and public engagement that might be aspired from archaeology undertaken as part of future development projects.

It is nice to see a good historic background for Easton in chapter 3. A particular highlight is that the 2017 archaeological investigations have been referred to and used to take the history of Easton back to Early Prehistory. The descriptions of the Bronze Age, Iron Age, and Roman settlement in the area is an excellent addition highlighting the significance of below-ground heritage and the importance of archaeological investigation. It is also good to see that listed buildings and the local scheduled monument have also been included.

In section 6.2 it is good to see that preserving the historic character of the area is part of the vision statement and that Historic Environment objectives have been included in 6.3 especially point 6 referring to conserving and enhancing the villages' heritage assets. It is also good to see non-designated heritage assets have been included in Figs 22 and 23.

The inclusion of conversion of agricultural buildings in Policy ETN1 is excellent and we would recommend it would be beneficial to include here that a heritage statement should be provided with any planning application related to converting barns or outbuildings.

Overall chapter 9 is very good and it is clear that protecting heritage is of great importance the NP group and community. It is particularly good to see it equally includes built and below-ground heritage. The inclusion of sites from the Suffolk HER in fig 46 is very much appreciated and helps to show all forms of heritage. There is an excellent reference to the role of SCCAS and the Suffolk HER in section 9.5 advising early consultation with us. Also good to see a full list of Listed Buildings and the Scheduled Monument have been included. It's really beneficial that the NP group have identified a number of non-designated heritage assets in Policy ETN8. It could be useful to add in section 9.9 that a heritage statement should accompany any planning applications related to a non-designated heritage asset.

Site Allocations:

Land South-west of Wickham Market Road (site 516) – Potential for medieval and prehistoric remains based on location at the edge of the village and nearby HER records,

specifically ETN 023 and ETN 018 on the opposite side of the road. SCCAS would recommend trenched evaluation to be secured by condition, with any mitigation based on the results.

Suffolk County Council Neighbourhood Planning

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

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) 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)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

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

Green Verges Designated as Local Green Spaces

SCC recognise that subsequent to the pre-submission (Regulation 14) consultation, the plan has included “grass verges” as protected landscape features in Policy ETN9 and hedgerow verges are retained in Policy ETN6. SCC welcomes these amendments.

As noted in the response to the pre-submission consultation, as the landowner of the two noted sites, **SCC objects** to the designation of highway verges (Local Green Space 2 and 3, as noted in Policy ENT7).

SCC has previously cautioned the parish against designating highway verges as Local Green Spaces, as part of the pre-submission consultation of the Easton Neighbourhood Plan.

SCC, as the Local Highway Authority, has a duty to ensure that roads are maintained and safe. There is the concern that, should there be a need to undertake highway works that affect the verges included in these allocations, there may be local opposition to such works

from the perceived damage to a protected green space, even though undertaken by (or on behalf of) the Local Highway Authority and is permitted development.

It is also not clear how highway verges meet the criteria of paragraph 106 of the NPPF December 2023 of being “demonstrably special” or of “particular local significance”. SCC feels that there is no recreation, amenity, tranquillity, ecological or historical significance that is gained from the designation of site 2 and site 4, and as such, these sites do not meet the criteria set out in the NPPF and are unsuitable to be designated as Local Green Spaces.

National guidance states that local green spaces must “be capable of enduring beyond the plan period” (paragraph 105 of the NPPF December 2023). Land adjoining an existing highway is subject to ‘Permitted Development’ rights, which could be used to bring forward development that is in direct contradiction to the designation of a Local Green Space but would not require planning permission to be granted. Highway land may also be utilised in bringing forward future highway/transport schemes, as well as active travel measures to encourage walking and cycling, such as cycle lanes or footways. Therefore, highway land/roadside verges are not suitable for designation.

Paragraph 108, part c, of the NPPF December 2023 states that “opportunities to promote walking, cycling and public transport use are identified and pursued” as part of plan-making and development proposals.

Policy ETN9 of the Reg16 version of the Easton Neighbourhood Plan states in part 11: “The inclusion of safe walking and cycling routes would be supported.”

However, SCC believes that it could be challenging to implement or encourage any potential future walking and or cycling infrastructure or routes through the village of Easton, if there are inappropriate Local Green Space designations hindering this aim.

In the Consultation Statement, Easton Neighbourhood Plan Steering Group stated: “The most pressing for small rural villages such as Easton is improvements to the poor condition of paved foot ways and instating new ones”. The inappropriate designation of highway verges as local green spaces would likely impede the ability to achieve the aspirations of improving existing paved footways and the installation of new ones.

Therefore, SCC recommends the removal of site 2 (Highway verges, The Street) and site 3 (Informal Green Space and signpost, Pound Corner) from the Local Green Space Policy ETN7.

Road Drainage

SCC is increasingly concerned with paragraphs 9.18 (previously paragraph 9.17) and 10.15 of the Easton Neighbourhood Plan. As stated in the pre-submission consultation response, SCC noted that the paragraph misattributed comments to SCC that were of a high priority “of the community”, this does not conflict with SCC’s obligations as the Local Highway

Authority which state (as noted in the pre-submission consultation response): “SCC, as the Local Highway Authority, has a duty to ensure that roads are maintained and safe as well as to provide and manage flood risk for highway drainage and roadside ditches.”

Specifically, these comments are related to paragraph 10.15. As part of the Reg14 response letter, SCC had suggested that this is clarified as a high priority “*of the community*”, as it could be inferred that drainage capacity and maintenance in Easton is a high priority of Suffolk Highways which is not known at this time.

Rather than correctly attributing the comments, SCC notes that paragraph 9.18 has been redrafted to state a further falsified account as outlined below:

“9.18 [...] SCC Highways responses are that the problems are not considered a priority.”

Further, Suffolk Highways are distinct from SCC Transport Strategy which provided the mentioned comments.

As noted above, it is a duty for the Local Highway Authority to “ensure that roads [...] manage flood risk for highway drainage”. SCC has not, and is not, stating that the problems as noted in the Easton Neighbourhood Plan are not considered a priority, rather seeking that the paragraph is corrected to attribute who is stating these comments.

SCC, therefore, requests that the above quoted words be removed from the plan to correct this error, as below:

“9.18 The flooding of the roads is made worse by road drainage systems that are consistently ineffective due to insufficient infrastructure to drain highways. The matter remains a high priority for residents and the County Highways Department is urged to address the problem to keep village roads passable. The Parish Council and residents regularly report the flooding problems by all methods available including the SCC Highways website reporting tool portal, SCC Highways responses are that the problems are not considered a priority.”

SCC also request that paragraph 10.15 is amended, as follows, to provide clarity:

“10.15 Surface water flooding of the roads is made worse by road drainage that is consistently ineffective due to insufficient drain capacity, and maintenance is required by SCC Highways. Addressing this is a high priority *of the community*, for keeping village roads safe and passable.”

SCC understands the communities’ concerns, welcomes the Easton Neighbourhood Plan in noting the issues, and will work with the community to ensure that roads are maintained and safe.

Active Travel

SCC believes that the Consultation Statement is confused by the intentions of SCC's comments regarding Active Travel. The Consultation Statement noted that "Active Travel is not applicable for small rural villages", whereas this encompasses the comments later noted which state "the most pressing for small rural villages [...] is improvements to the poor condition of paved foot ways". The Consultation Statement further argues that "Active Travel does not include this in the initiative."

SCC would also like to see improvements and provision of new connection links, which was the intention of the statement encouraging the promotion of Active and Sustainable Travel, as an ambition from a Public Health perspective to encourage more physical movement.

For clarity, Suffolk County Council is striving to make it safer, easier and more enjoyable for everyone to walk, cycle and wheel in and around the county, through several infrastructure schemes. These schemes aim to foster long-term habits of active travel and reap the numerous associated benefits including health, air quality, congestion, the local economy and road safety.¹

SCC considers that the plan currently does not comply with basic condition b, as stated in paragraphs 96 part c, and 108 part c, of the NPPF December 2023 which state:

"96. Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which: [...]

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being [...] layouts that encourage walking and cycling."

[...] 108. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: [...]

c) opportunities to promote walking, cycling and public transport use are identified and pursued;"

Therefore, as noted in SCC's response to the pre-submission consultation, SCC would suggest that Policy ETN9 (Design Considerations) be amended, as follows:

"11. The inclusion of safe walking and cycles routes would be supported; especially where they ensure that they are safe for residents of all ages and those that have mobility issues, or are otherwise vulnerable."

Policy ETN9 (Design Considerations)

¹ <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/improvements-for-walking-cycling-and-wheeling>

SCC believes that there has been some slight misunderstanding with our proposed amendment to Policy ETN9 Design Considerations.

To ensure compliance with paragraph 16 part d of the NPPF December 2023 (contain policies that are clearly written and unambiguous), the following amendments are proposed to Policy ETN9, part 14:

14. Development does not adversely affect the character or result in the loss of existing or proposed rights of way, ~~SCC will not be permit~~ and will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use.”

General

Please note that the Suffolk Guidance for Parking has been revised in October 2023. There is a reference to this document in Policy ETN9 Design Considerations part 4 to Suffolk Guidance for Parking 2019, which should be amended to reflect this update.

SCC notes that there is a typographical error in part 13 of Policy ETN9 (Design Consideration) which states “ENP3 dark skies” and should be corrected to read “~~ENP3~~ ETN3 dark skies”. Paragraph 8.10 also reads incorrectly, as “The ENP3 Dark Skies [...]”

SCC notes that the NPPF was revised on 19 December 2023 and any references within the plan or supporting documents will need to be updated to reflect this.

Suffolk Wildlife Trust

Thank you for inviting us to comment on the Regulation 16 Consultation on the Easton Neighbourhood Plan.

We are happy to see the plan look to protect the natural environment and deliver measurable net gains. The plan suitably identifies the County Wildlife Sites within the parish; this is clear and allows for an easy identification of these sites and furthers their protection.

Policy ETN5 – Recreational Disturbance Avoidance & Mitigation

Suffolk Wildlife Trust welcomes this policy, required in order to provide mitigation against the in-combination effect from new developments within the parish on coastal sites of international importance for nature. This RAMS contribution will be required for all new residential dwellings.

Policy ETN6 – Biodiversity and Habitats

The policy clearly lays out the expectation of new proposals to protect existing features of biodiversity value which we support. However, Suffolk Wildlife Trust believe this policy can deliver far more for nature; while we support the plan putting forward that a measured net gain must be shown to support development, the plan could push for more and show support for applications which deliver over 20% net gain. The national minimum will initially be a 10% requirement, and we believe that all areas of Suffolk are special and should deliver above the minimum requirement. We provide further evidence supporting this below.

Further support for wildlife could be the need to include species specific compensation and enhancement; integrated bird and boxes should be required in all new developments, ensuring that compensation for a loss of features is provided with enhancement on top of this.

We support the encouragement to use native species in planting mixes, which will provide a greater benefit for wildlife, notably invertebrates, and therefore benefit birds and mammals further up the food chain. In addition to planting, natural regeneration provides a further option which encourages the growth of plants with a local provenance.

Please inform us of the outcome of this planning application and do not hesitate to contact us should you require anything further.

In Support of Easton Neighbourhood Plan Aspiring to Deliver 20% Biodiversity Net Gain

The Environment Act 2021 requires development proposals to achieve a 10% net gain in biodiversity; whilst not yet required in law, this level is already being implemented as good practice across the country. It is expected that a legal requirement for a measured 10% net gain on larger developments will be enforceable from November 2023, with smaller developments seeing mandatory net gain of at least 10% in Spring 2024.

The Wildlife Trusts, as well as other organisations, are advocating for 20% Biodiversity Net Gain (BNG) where possible. Setting an aspiration for achieving a higher percentage of net gain within the Neighbourhood Plan could help to ensure that the biodiversity assets of Easton are conserved and enhanced for future generations. Other recent Neighbourhood Plans in Suffolk have included wording in support of 20% Biodiversity Net Gain, and we believe a similar aspiration can work in Easton.

Suffolk County Council's recent commitment to 'deliver a further 10% biodiversity net gain in aggregate across the housing programme, in addition to the 10% biodiversity net gain that will be required on each site.'¹, suggests that it is reasonable to include this aspiration within the Easton Neighbourhood Plan.

There are further examples of district councils outside of Suffolk requiring more ambitious BNG requirements within their Local Plans and these have been evidenced with viability studies. For example, Swale Borough Council completed a viability study and found that doubling the percentage of biodiversity net gain from 10% to 20% increased the cost of delivery by just 19%, so then included a minimum 20% BNG requirement in their local plan². The Greater Cambridge Draft Local Plan also includes a requirement for a minimum 20% BNG³. Therefore, we believe that Policy PFD4 could include a statement in support of development where 20% BNG can be demonstrated in the Parish.

Delivering 20% BNG ensures there is more certainty that a significant and meaningful uplift in biodiversity will be achieved, which will help protect the high-quality biodiversity assets and ecological networks within Playford and surrounding parishes.

¹ Confirmed Minutes - Cabinet - 1 February 2022 TR.pdf

² Local Plan Viability Study (swale.gov.uk).

³ Greater Cambridge Local Plan First Proposals (greatercambridgeplanning.org)

Susan Stone

Notice that the village verges are considered valuable green space and part of the historic environment.- Sadly many are being eroded through parking.

Speeding and traffic volume continues to be a problem in Easton particularly at school run time.

Informal off road, field edge pedestrian paths have been created along the Kettleburgh Road which are a really invaluable for walking in safety. More of the same would be excellent - linking footpaths and Wickham Market. It used to be possible to walk to Wickham Market - but the road is so dangerous now it is no longer safe for pedestrians.

Veronica Hall

ETN2: Council responses to the earlier Consultation undermined policy ETN2 which has been carried forward to the submission version. On page 130 of the Consultation document, the Steering Group responded that the Site Masterplan is indicative and subject to planning application and consultation, and on page 124, East Suffolk Council stated that the ambitious requirements for open space are supported but, at the planning stage the site could come under pressure to deliver a greater number of dwellings.

Development is to be 'guided by' the Conceptual Development Approach to Allocated Site, but this document mistakenly refers to Masterplan option 2 as the preferred site layout (twice on page 28, once on page 29 & page 32). This must be corrected to option 3 as correctly stated on pages 23 & 24 to avoid any misunderstanding. The mistake has arisen because the numbering system was altered.

ETN4: Important View 15 on fig. 22 will show the full impact of the elevations of the new houses as well as the hard edge of development against the backdrop of the rising rural landscape behind it and to the side of it. The visual impact of this new development will therefore be much greater than the oblique view of the roofscapes of Skylark Rise from Hacheston Road which has caused offence. Therefore a Landscape Visual Impact Assessment should be commissioned for the proposed development.

ETN9: Points 12, 13 and 14 are not well expressed and should be redrafted so that the meaning is clear.