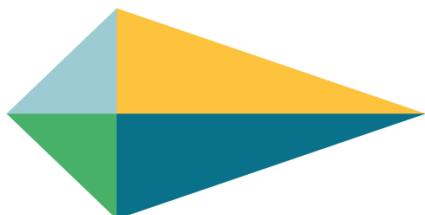


Responses to Oulton Neighbourhood Plan

Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 13 May 2022 to 24 June 2022

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EASTSUFFOLK
C O U N C I L

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What is the purpose of this document?

Oulton Parish Council submitted their Neighbourhood Plan to East Suffolk Council and the Broads Authority 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 13th May 2022 to 24th June 2022.

East Suffolk Council

General comments

A well-written plan responding to the views and concerns of the community. We are pleased to see how our comments and feedback throughout the development of the plan have been taken in to account. We have provided some detailed comments on this version of the plan below.

Para. 48, 4th sentence

This is quite a narrow consideration of the design of development. The National Design Guide is a useful starting point for what design should address in its Ten Characteristics. This could be remedied by amending the 4th sentence to say: *It also relates to layout, density and how it incorporates habitat features and landscaping, amongst other considerations.*

Para's 50 and 53.

The referenced Sustainable Construction SPD was adopted by East Suffolk Council on 5th April 2022.

Policy 3: Design; b; 2nd part

Typo: The use of materials that are prevalent in the parish, such as flint, brickwork, timber boarding, and render, will be supported, especially mixing materials on building facades,

Para. 66, final sentence

'These will also be a target for BNG where developers need to deliver improvement offsite.' – This is fine as an aspiration, but unless there is evidence of certainty that offsite BNG can be delivered in the Green Corridors (support from landowners, for example) then the wording in this sentence should be loosened.

Policy 4: Biodiversity and Green Corridors

- Criterion a) applies to development 'within' a green corridor. Criterion b) applies to development 'adjacent' to a green corridor. However, the map in fig. 7 shows *indicative* green corridors only, and they are drawn with deliberately blurred edges. Also, the map's scale means it is difficult to see the exact location of the green corridor. In addition, para. 68 describes the mapped corridors as 'indicative' due to the best opportunities for improvement potentially occurring adjacent to or outside of the corridor. Using a vague location of the green corridors as discussed in the plan is understandable, but this does mean that applying concepts such as 'within' or 'adjacent' to the green corridors in a precise manner is difficult and it will not be clear to a decision-maker how this should be achieved.

For these reasons it is recommended that criterion a) and b) are reworded so that they can be applied more generally and with better clarity, but in a manner which will still achieve the broad aim of delivering the green corridor.

- Criterion a, final sentence – flora is not something that normally moves - therefore is facilitating the movement of flora a mistake in the wording?
- Criterion d – it may not always be possible to deliver off-site BNG in the green corridors, therefore this requirement should be make more flexible.
- Taking account of the local plan allocations in providing the green corridors is supported. The corridors overlap with sites for major development allocated in the local plan in several locations and they must not impede the delivery of these sites.

Policy 5: Local Green Spaces

- Site 5 – Burial Grounds, near Union Lane – this is on a site allocated for residential development in the local plan. A Design Brief document has also been adopted by the Council to guide the development of this site <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Residential-development-Union-Lane-Oulton/Residential-Development-Brief-for-WLP2.14-Land-North-of-Union-Lane-Oulton.pdf>. In principle it appears that the development and the LGS can go together, but the exact area of the LGS allocation should be checked to ensure the allocated development can go ahead without being harmed by the LGS.
- The maps in the document are at a high level. More detailed maps of each Local Green Space should be included to make it easy to determine precisely what area each one covers.

Para. 102

The reference to the Council's 'Walking and Cycling Strategy' can be updated. Consultation on the draft strategy took place between Nov 2021 and January 2022. Adoption is expected in Autumn of this year.

More information here: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/draft-east-suffolk-cycling-and-walking-strategy/>

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 welcome the preparation of this plan, and are pleased to see that our earlier comments have been taken into consideration. As such we do not consider it necessary for Historic England to comment 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 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.

Natural England

Thank you for your consultation on the above dated 13 May 2022

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 neighbourhood plan.

Richard Carman

Policy 7 The Paddocks Area

The Paddocks Area should be extended to cover the other paddocks on Hall Lane and neighbouring roads. In addition consideration of the impact of WLP2.15's access on to Hall Lane for Horse Riders should be given careful consideration. My main concern is the Paddocks at the end of Hall Lane which are close to the proposed access road, the access is round a blind bend and couple result in accidents

Suffolk County Council

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Oulton 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.

We thank the Oulton Parish Council for making the changes proposed, and have no further comments to make on the plan.

We wish to be kept updated on the progress of this neighbourhood plan.

Suffolk Wildlife Trust

Thank you for the opportunity to comment on this plan.

Suffolk Wildlife Trust welcomes the plan and considers it to be exemplary in terms of its consideration of the natural environment, protection of sites designated for their nature conservation value in adjacent areas, protection of County Wildlife Sites and Priority BAP Habitats and Species within the Parish of Oulton, identification of green corridors and local green spaces, the need to create and enhance ecological assets and green infrastructure.

We wish to highlight particular parts of the plan which we support and welcome:

Vision

We welcome the recognition of the importance of the area for habitats and wildlife, the importance of this to the residents of Oulton, and the intention of the plan to result in “a more coherent, connected and expansive ecological network of key habitats that delivers a significant net ecological gain for wildlife over the plan period”.

Given that we are facing both climate and ecological emergencies that will have huge social, environmental, and economic costs unless we take urgent action now to prevent the worst impacts, we also welcome the key contribution of the plan towards addressing climate change.

We particularly welcome these objectives:

- A. Ensure the natural environment is a key consideration in all decisions about how Oulton changes;
- B. Conserve and enhance Oulton’s ecological network;
- F. Respond to climate change, promoting sustainable development and energy efficiency;
- H. Protect important green spaces;
- I. Promote access to the countryside for recreation and enjoyment;

Policy 3: Design

We welcome these paragraphs:

e. Improve landscape and access to the countryside, which links well to policies 4 and 5 on green corridors and local green spaces, emphasising the importance of linking open spaces, incorporating natural features and delivering or complementing the ecological network. The policy on soft boundaries instead of hard boundaries such as close boarded fencing will help wildlife which needs to disperse, such as hedgehogs, a rapidly declining species whose stronghold is now largely within suburban gardens and who need to be able to move through boundaries unhindered. Hedgehogs have been recorded reasonably frequently within Oulton.

f. Design for sustainability, supporting low carbon infrastructure and high energy efficiency.

Natural Environment

This section is exemplary, in that it recognises:

- the effects of development in Oulton on designated sites in adjacent areas, including the Suffolk Wildlife Trust's nature reserve at Carlton & Oulton Marshes and the requirement for appropriate mitigation;
- the importance of protecting the five county wildlife sites and priority BAP habitats in Oulton;
- the value for wildlife of developing 5ha of woodland, a large wildflower meadow, hay field and an area set aside for scrub in the new Woods Meadow country park;
- that the National Planning Policy Framework (Chapter 15) affords considerable support for protecting and enhancing key landscapes and areas of value in terms of biodiversity, the need for biodiversity net gains in developments, including through green infrastructure networks, the mapping of ecological assets and networks, including for enhancement and creation, the protection of existing green open spaces and creation of new ones, and the introduction of Local Nature Recovery Strategies, which will establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits;
- the local plan policies on the conservation and enhancement of the natural environment, including ecological gains and creating improved networks, protecting locally recognised sites, including County Wildlife Sites, Biodiversity Action Plan habitats;
- the importance of establishing green corridors to increase biodiversity and connectivity, particularly between County Wildlife Sites, priority and other important habitats, and areas identified as National Habitat Enhancement Zone 2, where opportunities to support habitat creation and enhance ecological corridors should be explored.

Policy 4 on Biodiversity and Green Corridors

We strongly support this policy and its measures to ensure green corridors are protected from new developments and deliver measurable net gains for biodiversity.

Local Green Space

We welcome the designation and protection of 11 local green spaces and the recognition of the value they have both to nature and to people through recreation and reconnecting with nature.

Conclusion

We congratulate the Parish Council for producing an exemplary Neighbourhood Plan and will look forward to providing whatever assistance we can to help implement its policies for the natural environment. Please do not hesitate to contact us if you need any further advice or clarification.

Vincent Ainley

Policy 10: Traffic and Speed

In accordance with this neighbourhood plan I would like to call upon our Parish Council to withdraw their application for the raising of the speed limit on Oulton Street B1375. Your own plan calls for reductions in vehicle speeds.

Waveney, Lower Yare and Lothingland Internal Drainage Board (Water Management Alliance)

Thank you for consulting the Water Management Alliance on the Oulton Neighbourhood Plan (2021-2036). The Parish of Oulton is partially within the Internal Drainage District (IDD) of the Waveney, Lower Yare and Lothingland Internal Drainage Board (IDB) and therefore the Board's Byelaws apply. The area also falls within the Boards' Watershed Catchments (meaning water from the site will eventually enter the IDD). A copy of the Board's Byelaws can be accessed on our website, https://www.wlma.org.uk/uploads/WLYLIDB_Byelaws.pdf, along with the maps of the IDB, https://www.wlma.org.uk/uploads/WLYLIDB_Index_Map.pdf.

The principal function of the IDB is to provide flood protection within the Board's area. Certain watercourses within the IDD receive maintenance by the Board. The maintenance of a watercourse by the IDB is an acknowledgement by the Board that the watercourse is of arterial importance to the IDD. The Board will comment on planning for all major developments (10 or more properties) within the IDD watershed that are likely to discharge surface water into a watercourse within the IDD. Under certain circumstances, some major developments outside the IDD boundary may also be regulated by the Board's byelaws. We request that the Board is consulted as any planning application comes forward relating to any of the identified allocation sites. For any development site, we recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance [SuDS discharge location hierarchy](#).

Main Rivers within the IDB are regulated by the Environment Agency. Therefore, I recommend that an applicant proposing a discharge or any other works affecting a main river to contact the Environment Agency.

Developments within the IDB watershed

Woods Meadow Development

The above site lies outside the WLYLIDB's IDD, however it has the potential to significantly impact the Board's district should a surface water discharge be proposed. We are pleased to note that the site is in the process of applying for the relevant planning permission, ensuring their drainage proposals are designed in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. If a discharge is proposed to the IDD, it is possible that consent will be required from the Board for surface water discharge.

Local Plan Allocations: WLP2.14, WLP2.15, WLP2.18

We recommend that as each of these sites prepares to apply for planning permission, they ensure their drainage proposals are designed in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. It is possible that consent will be required from the Board for surface water discharge from these sites. Our standing advice at this stage is as follows:

- Surface water disposal from new developments should be in line with the drainage hierarchy (as per best practice).
- We recommend that a drainage strategy is supplied which has been considered in line with the Planning Practice Guidance SuDS discharge location hierarchy.
- If it is proposed that a site disposes of surface water via infiltration, we recommend that the viability of this proposal is evidenced by ground investigation followed by infiltration testing in line with BRE Digest 365.
- If a surface water discharge is proposed to a watercourse within the watershed catchment of the Board's IDD then we request that this be in line with the Non-Statutory technical standards for sustainable drainage systems (SuDS), specifically S2 and S4. Resultantly we recommend that the discharge from this site is attenuated to the Greenfield Runoff Rates wherever possible.
- Should any development proposals include works to alter a riparian watercourse (including culverting for access), consent will be required under Section 23 of the Land Drainage Act 1991. The Board is responsible for consenting this activity within the IDD, while Norfolk County Council (the Lead Local Flood Authority) is the regulatory body outside the boundary of the IDD.

Whilst the consenting process as set out under the Land Drainage Act 1991 and the aforementioned Byelaws are separate from planning, the ability to implement a planning permission may be dependent on the granting of these consents. As such I strongly recommend that the required consent is sought prior to determination of the planning application.