

Babergh District Council

Newton Neighbourhood Development Plan

Submission Consultation Responses



In February 2021, Newton Parish Council (the 'Qualifying Body') submitted their Neighbourhood Development Plan to Babergh District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

The consultation period ran from Monday 1 March until 4:00pm on Friday 23 April 2021.

Ten organisations / individuals submitted written representations. All are listed below, and copies of their representation are attached.

NB: The list includes a representation from Historic England which was received shortly after the consultation cut-off time so that is shown here as a late representation.

Newton Parish Council were also given an opportunity to respond to new issues raised at this stage. Their response is included at the end of the document.

Rep No.	Consultee
(1)	Cllr Maybury (Ward Member for Lavenham)
(2)	Suffolk County Council
(3)	Natural England
(4)	Suffolk Wildlife Trust
(5)	Anglian Water
(6)	Highways England
(7)	Water Management Alliance
(8)	National Grid (via Avison Young)
(9)	Mr Baldwin
(10)	Historic England (<i>Late Representation</i>)
(11)	Response from Newton Parish Council

[PLEASE NOTE: THIS PAGE IS INTENTIONALLY BLANK]

(1) Cllr MAYBURY (Babergh District Council)

From: Margaret Maybury (Cllr) <Margaret.Maybury@babergh.gov.uk>

Sent: 09 March 2021 08:29

To: Paul Bryant <Paul.Bryant@baberghmidsuffolk.gov.uk>

Subject: newton NP

Dear Paul,

I have viewed Newton Neighbourhood Plan and I send my congratulations to the parish for/on the concise proposals.

I do have some comments which I plan to add here as bullet points.

- In consideration of the varying large new build agricultural buildings that are appearing around Newton – although these may be being erected under permitted development - they are rather numerous in number and quite obtrusive in open land areas. Should these be logged into the NP and comments made?
- What of safe walkways for villagers along the main A131? I may have missed this in my skimming but from experience I recognise that wide, safe walkways are needed along the highway.

With kind regards,

Margaret Maybury

Member for Lavenham Ward

Genesis Corner, Clay Hall Lane, Acton CO10 0AQ

01787 464358

(2) SUFFOLK COUNTY COUNCIL

Date: 23 April 2021
Enquiries to: Georgia Teague
Tel: [REDACTED]
Email: [REDACTED]



Babergh District Council
Endeavour House,
8 Russell Road,
Ipswich
IP1 2BX

Dear Mr Hobbs,

Submission Consultation version of the Newton Neighbourhood Plan

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

Health and Wellbeing

The Newton Neighbourhood Plan makes reference to the ageing population in that 54% of residents are aged 55 or older, and paragraph 6.12 indicated that the Housing Needs Survey highlighted the desire for "smaller homes as older people downsize" and "more accessible/adaptable home for care/disability needs".

During the previous consultation stage, the county council recommended the neighbourhood plan include specific mention of homes that are adaptable and accessible, with the following wording to be included in either Policy NEWT2 Local Housing Need, or Policy NEWT3 Character and Design of Development:

"Support will be given for smaller 2 and 3 bedroomed homes that are adaptable (meaning built to optional M4(2) standards), in order to meet the needs of the aging population, without excluding the needs of the younger buyers and families."

SCC acknowledges the Parish Council's response in the Consultation Statement, that Policy NEWT2 would not be the most suitable place to include the proposed text, as the policy title has now been changed from "Local Housing Need" in the Reg14 version, to "Affordable Housing on Rural Exception Sites" in the Reg16 version.

SCC thinks the Neighbourhood Plan Group may have misunderstood what M4(2) housing is. M4(2) is not in itself housing with care but is a building standard, which means a home is built so that it is easier to be adapted as people's mobility needs change (for example with age). It is recommended that housing should be built to be affordable and to be adaptable, as the two housing types are not mutually exclusive. It is likely that some residents of affordable housing will need to make adaptations to their home. If the neighbourhood plan group is minded to make a change to the neighbourhood plan encouraging M4(2), placing this in Policy NEWT3 would be appropriate.

Following guidance from footnote 46 in the NPPF ('Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties'), this addition into Policy NEWT3 would ensure that Newton Neighbourhood Plan meets Basic Condition a).

This would also help the plan meet the needs of a wider range of groups including older and vulnerable people, reflecting paragraph 61 of the NPPF.

Paragraph 13.04 of the Babergh and Mid Suffolk Joint Local Plan states that "...there is an identified need to meet future housing demands regarding accessible and adaptable dwellings....".

SCC has no further comments at this time and wishes to be kept informed and updated of the progress of this neighbourhood plan.

If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Georgia Teague
Planning Officer
Growth, Highways, and Infrastructure

(3) NATURAL ENGLAND

Date: 05 March 2021
Our ref: 345052
Your ref: Newton Neighbourhood Plan

Babergh District Council
communityplanning@baberghmidsuffolk.gov.uk

BY EMAIL ONLY



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam

Submission draft Newton Neighbourhood Development Plan 2018 - 2036

Thank you for your consultation, which was received by Natural England on 25 February 2021

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.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully

Corben Hastings
Consultations Team

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 [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. 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](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ 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.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

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](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

(4) SUFFOLK WILDLIFE TRUST

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr Jacob Devenney
Job Title (if applicable):	Planning and Biodiversity Adviser
Organisation / Company (if applicable):	Suffolk Wildlife Trust
Address:	Brooke House Ashbocking Ipswich
Postcode:	IP6 9JY
Tel No:	
E-mail:	jacob.devenney@suffolkwildlifetrust.org

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	7.20 – 7.25	Policy No.	NEWT 7
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support ☐ Support with modifications ☒ Oppose ☐ Have Comments ☐

Please give details of your reasons for support / opposition, or make other comments here:

We are pleased to see that the Newton Neighbourhood Plan recognises the importance of biodiversity and proposes measures to protect and enhance it. We are pleased to see the Policy recognises the three County Wildlife Sites (CWSs) located within the Parish and seeks to protect them. We are also pleased to see recognition within the Policy of the River Box as part of the wider ecological network and its protection within Policy Newt 7. As stated within the National Planning Policy Framework (2019), development should seek to provide biodiversity net gain, so it is encouraging that this is recognised within the Parish. However, we believe that the plan can be expanded to further safeguard species and habitats from fragmentation caused by development.

What improvements or modifications would you suggest?

The policy should reference safeguarding protected species, as well as Priority Habitats and Species as listed within The Natural Environment and Rural Communities (NERC) Act 2006 from future development. The NPPF (section 174) identifies that all development should protect and enhance biodiversity, including to 'promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.' Therefore, developments must demonstrate that they result in the net gain of Priority Habitats and not result in a negative impact upon protected and Priority Species.

All future development proposals should apply the mitigation hierarchy to reduce, as far as possible, negative effects on biodiversity. The mitigation hierarchy requires that in the first instance impacts are avoided, if they cannot be avoided then they should be mitigated for and only as a last resort should impacts be compensated. Enhancement and delivery of biodiversity net gain i.e. an approach that leaves biodiversity in a better state than before should be part of all development proposals, in line with the Government's emerging Environment Act predicted to receive Royal Assent in 2021. This should therefore be referenced within Policy Newt 7 to ensure that future development will not have a negative effect on the area's biodiversity and will deliver a biodiversity net gain.

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner (the Examiners Report)	✓
The final 'making' (adoption) of the Newton NDP by Babergh District Council	✓

Signed: Jacob Devenney

Dated: 19th April 2021

Consultation Response Form

Newton Neighbourhood Development Plan 2018 - 2036

**The Neighbourhood Planning (General) Regulations 2012
Regulation 16 (as amended)**

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Stewart Patience
Job Title (if applicable):	Spatial Planning Manager
Organisation / Company (if applicable):	Anglian Water Services Limited
Address:	Thorpe Wood House, Thorpe Wood, Peterborough
Postcode:	PE3 6WT
Tel No:	
E-mail:	spatialplanning@anglianwater.co.uk

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	NEWT 1
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support ☒ Support with modifications ☐ Oppose ☐ Have Comments ☐

Please give details of your reasons for support / opposition, or make other comments here:

Anglian Water's existing infrastructure is often located in the countryside at a distance from built up areas.

We had previously asked that the infrastructure provided by Anglian Water for our customers is an exceptional use for the purposes of this policy as set out in our previous representations on the Neighbourhood Plan. Therefore, we are supportive of the wording in the point 2 (ii) of this policy.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner (the Examiners Report)	X
The final 'making' (adoption) of the Newton NDP by Babergh District Council	X

Signed: Stewart Patience

Dated: 8th March 2021

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.		Policy No.	NEWT 7
---------------	--	------------	--------

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support ☒ Support with modifications ☐ Oppose ☐ Have Comments ☐

Please give details of your reasons for support / opposition, or make other comments here:

Reference is made to sustainable drainage systems (SuDS) being incorporated within the design for all development proposals.

Anglian Water support the requirement for applicants to include the provision of Sustainable Drainage Systems (SuDS). The use of SuDS would help to reduce the risk of surface water and sewer flooding and which have wider benefits e.g. water quality enhancement.

We also welcome the requirement to consider a wide range of SuDS measures as part of the design of new development proposals as this will help promote better design which will have community and environmental benefits.

We note that an amendment has been made to include reference to water re-use measures as suggested by Suffolk County Council as Lead Local Flood Authority. Anglian Water is actively promoting increased water efficiency and water re-use as part of new residential developments. As such we are supportive of the reference made to water re-use measures - rainwater and stormwater harvesting and grey water recycling.

Similarly, we are supportive of the requirement to provide a maintenance plan for any SuDs features including details the adopting body. (Anglian Water is an adopting body for SuDs features which meet the legal definition of sewers and the Water sector Design and Construction Guidance and encourages applicants to contact us as early as possible).

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner (the Examiners Report)	X
The final 'making' (adoption) of the Newton NDP by Babergh District Council	X

Signed: Stewart Patience

Dated: 8th March 2021

(6) HIGHWAYS ENGLAND

From: Planning EE <PlanningEE@highwaysengland.co.uk>

To: BMSDC Community Planning <communityplanning@babberghmidsuffolk.gov.uk>

Subject: Newton Neighbourhood Plan Consultation Response

Dear Sir/Madam

Thank you for your consultation on the above Neighbourhood Plan.

We have reviewed the details and information provided. Due to the area and location that is covered by this Neighbourhood Plan being quite remote from the Strategic Road Network (SRN), any traffic generation from any future development would be diluted before reaching the SRN, therefore there would be no predicted adverse effect upon the Strategic Road Network.

Consequently, we offer **No Comment**.

Kind Regards

Jarrold Goy, Senior Administrator

Spatial Planning | Operations (east) Highways England

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

Email; planningEE@highwaysengland.co.uk

Web: <http://www.highways.gov.uk>

For any planning related matters please email PlanningEE@highwaysengland.co.uk

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Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF
| <https://www.gov.uk/government/organisations/highways-england> |
info@highwaysengland.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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(7) WATER MANAGEMENT ALLIANCE

From: Planning <planning@wlma.org.uk>

To: BMSDC Community Planning <communityplanning@babberghmidsuffolk.gov.uk>

Subject: RE: CONSULTATION: Reg 16 Newton N'hood Plan (Babergh)

Good Morning,

The parish of Newton is located outside any of the WMA member Boards Internal Drainage Districts as well as their wider watershed catchments, therefore the Board has no comments to make.

Kind Regards,

Jess

Jessica Nobbs

Senior Sustainable Development Officer

e: planning@wlma.org.uk



Water Management Alliance

Kettlewell House, Austin Fields Industrial Estate, King's Lynn, Norfolk, [PE30 1PH](https://www.google.com/maps/place/PE30+1PH), UK

t: +44 (0)1553 819600 | f: +44 (0)1553 819639 | e: info@wlma.org.uk | www.wlma.org.uk

Membership: [Broads Drainage Board](#), [East Suffolk Drainage Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [South Holland Drainage Board](#) and [Waveney, Lower Yare and Lothingland IDB](#).

In association with [Pevensey and Cuckmere Water Level Management Board](#), [Upper Medway IDB](#) and [Lower Medway IDB](#).

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(8) NATIONAL GRID

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avisonyoung.co.uk

Our Ref: MV/ 15B901605



08 April 2021

paul.bryant@baberghmidsuffolk.gov.uk

via email only

Dear Sir / Madam

Newton Neighbourhood Plan Regulation 16 Consultation Representations on behalf of National Grid

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

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

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

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

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

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

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

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

Distribution Networks

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



www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Matt Verlander MRTPI
Director**



matt.verlander@avisonyoung.com

For and on behalf of Avison Young

Guidance on development near National Grid assets

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

Electricity assets

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

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

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

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

Gas assets

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

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

Avison Young (UK) Limited registered in England and Wales number 6382509.
Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS



- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team

Block 1

Brick Kiln Street

Hinckley

LE10 0NA

0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

(9) MR BALDWIN

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	(Mr) Baldwin
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	[redacted]
Postcode:	[redacted]
Tel No:	[redacted]
E-mail:	[redacted]

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Introduction & 1.15	Policy No.	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support
Comments

Support with modifications

Oppose

Have

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ...

In the introduction to the plan it states that further development in the village will be minimal and should be focused within the settlement boundary.

At paragraph 1.15 this is again supported " However, given the limited scale of development required to be supported"

Two points.

As stated in the introduction in the babergh and mid suffolk emerging joint local plan Newton is expected to accomodate AT least 23 new dwellings.

Further development will be driven by need in the local community

The 23 is a Minimum Number there is no maximum, so maybe provision should be made for this in the plan because the plan is not there to restrict development, although the wording in the plan indicates that there is no need to make allowances in the plan because there will only be minimal further development allowed which goes against the the remit of the plan which is not to restrict further new development.

In the introduction it is also stated residential development should be focused within the settlement boundary.

The current settlement boundary at Newton borders all established residential development thus forcing all new applications for development to be outside of the current settlement boundary placing it outside the requirements of the plan because provisions have not been allowed in the plan.

The plan does not allocate specific sites for any further development because the plan indicates that further development does not need to be supported which i feel is incorrect

What improvements or modifications would you suggest?

Please be as brief and concise as possible ...

Planning applications need to be examined against the need for current housing in the local community, whilst minimising any harm to the character of the village.

Any future development of the village will have a very limiting effect on the real character of the village because the village green is the core of that character with the majority of the older character residential properties located around the green. The further you travel away from this core to the outside of the village reveals a far higher proportion of newer residential properties built within the last 80 years with the odd older character residence dotted amongst them.

Further development within the village could be accommodated over the minimum numbers set out in the local plan without harming the character of the village using infill sites and back built sites away from the core of the village.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

For Office use only:

Section Two: Your representation(s)

To which part of the document does your representation relate? (You may wish to complete a separate form for each separate representation)

Paragraph No.	Map 4	Policy No.	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support
Comments

Support with modifications

Oppose

Have

Please give details of your reasons for support / opposition, or make other comments here:

Please be as brief and concise as possible ..

The map indicates an area of Recreational open space i consider this to be incorrect

There are many residential dwellings and gardens which fall in this zone which are clearly historic development not Recreational open space.

The plan now seems to want to gloss over the historical development on this side of the road.

Even the back nine of the golf course is only recreational space if you pay the golf club a fee to use it. It has a public footpath across it but members of the public and villagers are not intitled to walk over the course off this footpath.

The land on both sides of the indicated 21st Century Development at Red House Farm are not Recreational Open Space.

The land to the North of the indicated 21st Century Development also now has more 21st Century Development under way.

This 21st Century Development to quote a planning inspector " represents a logical extention of the village, be self contained, follow an existing natural boundary and relate well, both visually and functionally, to the settlement pattern of the village "

Seems a logical position for future development.

The remaining land at Red House Farm could be called Agricultural Land at present.

The map also indicates Historic Linear with Modern infill the village has been extensively backbuilt in the last 100 years and i feel this needs to be recognised.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

Correction to terms used and colouring on the map.

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

I consider that a hearing should be held because ...

Please be as brief and concise as possible ..

(Continue on separate sheet if necessary)

Please indicate (tick) whether you wish to be notified of:

The publication of the recommendations of the Examiner (the Examiners Report)	
The final 'making' (adoption) of the Newton NDP by Babergh District Council	

Signature

Dated:

21/4/2021



Mr Paul Bryant
Babergh & Mid Suffolk District Councils
Endeavor House
8 Russell Road
Ipswich
Suffolk
IP7 6SJ

Direct Dial: [REDACTED]

Our ref: PL00365782

23 April 2021

Dear Mr Bryant

Ref: Newton Neighbourhood Plan Regulation 16 Consultation

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

We welcome the production of this neighbourhood plan, but do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you 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 your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district 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 NP, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Edward James
Historic Places Advisor, East of England

[REDACTED]

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



(11) NEWTON PARISH COUNCIL

NEWTON NEIGHBOURHOOD PLAN – REGULATION 16 VERSION

RESPONSE BY NEWTON PARISH COUNCIL TO REPRESENTATIONS MADE AT REGULATION 16 STAGE

12TH MAY 2021

Newton Parish Council (NPC) has reviewed the representations made at Regulation 16 stage and has the following responses where it considers this would assist the Examiner:

Representation	Response by Newton Parish Council
Suffolk County Council Inclusion of wording in NEWT3 relating to adaptable and accessible homes.	NPC acknowledges that it would be appropriate to include reference to accessible homes and agrees that this would be most suitable in NEWT3. However, it would also observe that the emerging Joint Local Plan (now at Examination in Public Stage, starting on 21 st June) has a policy (Policy LP06) requiring provision of Part M4(2) housing in its Regulation 19 Submission version. It is therefore questionable as to the value of including this in Policy NEWT3 when it is likely to be superseded by the expected adoption of the Joint Local Plan in due course.
Suffolk Wildlife Trust Policy NEWT7 should reference safeguarding protected species, as well as Priority Habitats and Species as listed within The Natural Environment and Rural Communities (NERC) Act 2006 from future development. All future development proposals should apply the mitigation hierarchy to reduce, as far as possible, negative effects on biodiversity. This should therefore be referenced within Policy Newt 7 to ensure that future development will not have a negative effect on the area's biodiversity and will deliver a biodiversity net gain.	NPC is supportive of both suggested improvements to Policy NEWT7.

Representation	Response by Newton Parish Council
<p>Mr Baldwin</p> <p>Map 4 (Newton Character Areas) is incorrect.</p>	<p>The purpose of the Character Area Assessment is to consider the different areas across the parish in terms of their uses, architecture and feel. The boundaries between character areas are not intended to necessarily represent precise boundaries where specific types of land use (or ownership) change. The titles given to each character area are necessarily broad, the purpose being to distinguish between them. It is acknowledged that certain parts of the Recreational Open Space CA are not open to the public but that is not directly relevant to the exercise of establishing character.</p>