

Mid Suffolk District Council



Beyton Neighbourhood Plan 2018 - 2037

Reg 16 Submission consultation responses

In late January 2023, Beyton Parish Council (the 'qualifying body') submitted their Neighbourhood Development Plan to Mid Suffolk District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Monday 6 March to Wednesday 26 April 2023.

Nine representations were received. All are listed below and copies are attached.

Note 1: The representation from the Defence Infrastructure Organisation, obo the MOD arrived around midday on 27 March. It contains information that may be helpful so has been included here as duly made representation.

Note 2: The representation from Historic England did not arrive until late on the 28 April. It has been recorded as late representation.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Mid Suffolk District Council
(3)	East Suffolk Council
(4)	Anglian Water
(5)	Water Management Alliance
(6)	National Highways
(7)	Resident – Mr Rogers
(8)	Mr Livall
(9)	Defence Infrastructure Organisation, obo the MOD
(10)	Late representation: Historic England

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(1) SUFFOLK COUNTY COUNCIL

Date: 26 April 2023
Enquiries to: Georgia Teague
Tel: [REDACTED]
Email: [REDACTED]
neighbourhoodplanning@suffolk.gov.uk



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

Dear Caileigh Gorzelak,

Submission Consultation version of the Beyton Neighbourhood Plan

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

Meeting the needs of an ageing population

As part of the pre-submission consultation, SCC raised the concerns for meeting the needs of an ageing population.

We had noted that the neighbourhood plan states that there is an ageing population in paragraph 6.6, with over a quarter of the residents are aged 65 or older, however the plan only refers to bungalows as housing provisions for the elderly.

SCC suggested that the plan could also include the desire for smaller homes that are adaptable and accessible, which meets the requirements for both older residents as well as younger people and families. Building homes that are accessible and adaptable means that these homes can be changed with the needs of their occupants, for example if their mobility worsens with age, as these homes are built to a standard that can meet the needs of a lifetime. While it is understandable that each housing type may not be suitably accommodated on every site, efforts should be made where possible to ensure that each site contains a mixture of housing types. This can help prevent segregation by age group and possible resulting isolation.

Whilst SCC acknowledges that the Ministerial Statement 2015 referenced in the Consultation Statement states that neighbourhood plans should not set additional technical standards; SCC was not proposing that the plan should impose a requirement for M4(2). SCC recommended that the plan set out a positive position towards proposals which contain homes built to those standards, in the same way that the neighbourhood plan supports bungalows in Policy BTN7, and the Nationally Described Space Standards in paragraph 6.36. This will help the plan meet the needs of a wider range of groups including older and vulnerable people, reflecting paragraph 61 of the NPPF.

Following guidance from footnote 46 in the NPPF, which indicates that “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.”

The Beyton neighbourhood plan indicates that there is a need for this. Objective 1 states that new housing should “meets locally identified needs and desires of villagers”, and paragraph 6.6 states that there is an ageing population and that “at present there is not enough appropriate housing in the village to meet the needs of this group in the future”, and paragraph 6.4 states there is the desire for “more accommodation for elderly residents”.

Therefore, in order to meet the needs of an ageing population, and the desires of the community, the plan should state the support for homes that are adaptable and accessible (i.e., built to M4(2) standards). To help the plan meet Basic Condition a) and accord with paragraph 61 and footnote 46 of the NPPF, the following wording is recommended for Policy BTN7 Housing Mix:

“Support will be given for 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 people and families.”

Local Green Spaces

During the pre-submission consultation, SCC raised some concerns with some of the proposed Local Green Spaces in Policy BTN12, namely Site 5 “Verges between The Green and the Bear Public House” (now Policy BTN11)

SCC recommends caution with designation of roadside verges as Local Green Spaces, as they typically cannot prove the justification of being “demonstrably special” or “of particular local significance” to the community, as per paragraph 102 of the NPPF.

SCC believes that the Local Green Space Assessment supporting document does not provide suitable reasoning as to why these verges are significant and worthy of protection, as the site does not appear to provide beauty, recreational value, tranquillity or have specific ecological significance.

SCC would be less opposed to this site if it were to be incorporated into the Village Green (site 3) designation, rather than a standalone designation.

Public Rights of Way

The lack of reference to Public Rights of Way (PROW) in the plan is somewhat concerning.

The NPPF states in paragraph 100 that “Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”

The Consultation Statement indicated that this matter was addressed in the policies of the Joint Local Plan. However, as the Joint Local Plan reached issues as part of the Examination, there is currently not an up-to-date version of a local plan, and as the local plan is under review, there is uncertainty of what this policy would entail.

A neighbourhood plan is an opportune time to protect and, where possible, seek enhancement of the rights of way in the village. This would help to achieve sustainable development, through encouraging travel via non-vehicular modes of transport, thereby helping to reduce traffic congestion, air pollution, and climate change.

Therefore, the following wording is suggested to be added to Policy BTN 16 Design Considerations:

“Public Rights of Way should be protected and enhanced. Development which would adversely affect the character or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use”

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

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(2) MID SUFFOLK DISTRICT COUNCIL

Our ref: Beyton NP R16 Response
Dated: 26 April 2023

From: Planning Policy Team, BMSDC
To: Ann Skippers (Beyton NP Examiner)
cc: *Beyton Parish Council, Ian Poole*

Dear Ann,

- 1. Beyton Neighbourhood Plan 2018 - 2037**
- 2. Reg 16 Submission Consultation – Comments from Mid Suffolk District Council**

This response is made for and on behalf of Robert Hobbs (Corporate Manager for Strategic Planning at Babergh & Mid Suffolk District Councils).

We welcome the changes that have been made to the Beyton Neighbourhood Plan (the 'Plan') in response to our Regulation 14 comments (April 2021). We also note that the opportunity has been taken to bring supporting text up to date with regard to our emerging Joint Local Plan (the 'JLP'). Some further amendments might be possible, e.g., instead of para 8.9 referring to JLP Policy LP21, it could now refer to JLP Part 1 Policy LP19, but those are probably best considered on a case by case basis if / when this Plan is approved to go forward to a local referendum.

We have found it necessary to make some further observations on this Plan, and also have some questions which we direct to the parish council. These are appended to this letter. It is also our view that the points raised do not fundamentally alter the nature of this Plan but will help provide clarity.

We trust that all of our comments are helpful.

Yours sincerely

Paul Bryant
Neighbourhood Planning Officer | Planning & Building Control
Babergh & Mid Suffolk District Councils
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Policy BTN 2 – Housing Development, and Appendix 1

Policy BTN 2 states that this Plan provides for around 43 additional dwellings over the plan period. The figure is the sum of pre-approved permissions and the three site allocations. The number is unchanged from the Reg 14 version of Plan.

In our Reg 14 response we said that the number of new homes being proposed exceeded what was then the minimum, now ‘indicative’, housing figure for the parish (30 dwellings) but we did say that we had difficulties in reconciling the information provided in Appendix 1. In the Consultation Statement (page 45) we see that the parish council agreed with us and said they would amend the appendix accordingly.

Looking at Appendix 1 as it is now presented, we are concerned that the numbers still do not add up. If this appendix is to be retained, we feel that further changes are necessary. Our amended version appears at the end of this response. We have added back in the missing SHELAA entries, summarised the proposal descriptions and have noted that two of the approved permissions relate to the BTN 3 site.

Policy BTN 3 - Land at the Former Nursery, Tostock Road

The opening paragraph refers to Map 5. We think this should read “ .. *indicated on Map 4* ..”

Regarding criterion iv) and v): these did not appear in the Reg 14 version of this policy but are shown as text to be deleted in Appendix 7 (page 265) of the submitted consultation statement.

- **Qstn 1** - Can the Parish Council please confirm whether these two criteria should or should not appear in policy BTN 3?
- **Qstn 2** - If these two criteria are to be retained, should ‘iv)’ refer to BTN 13 (not BTN 15)?

Policy BTN 4 - Land south of Bury Road & Diagram 1 (page 24)

Para 6.21 of the Plan refers to the Beyton Masterplanning Report (Feb 2021). According to the cover, this is a ‘Draft Report’. There is also a ‘Final Report’ (updated August 2022), which is the version submitted with the Plan to the District Council. Links to both are provided below:

Draft <https://beyton.suffolk.cloud/assets/NP-Public-Info/The-Plan-and-Supporting-References/Draft-Beyton-Site-Masterplans-Feb-2021.pdf> (as published on the Parish Council website)

Final <https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Beyton-NP-Site-Masterplans.pdf> (as published on the District Council website)

Para 6.25 of the Plan refers to a Site Concept plan for the BTN 4 site and reproduces this as Diagram 1 on page 24. While we accept that this is only a ‘concept’ plan, anyone comparing Diagram 1 in the Plan with the submitted Masterplanning Report (Aug 2022) will struggle to find a comparable image.

- **Qstn for the PC:** Should para 6.21 and Diagram 1 both be amended so that they refer to the Final Beyton Masterplanning Report (Aug 2022)?

(Nb: We have no comment to make on the policy text itself.)

Policy BTN 5 - Land opp. Bear Public House, para 6.26, and Diagram 2

Can the Parish Council please look again at the opening sentence of para 6.26. It is muddled, which suggests that some text is missing. In the second sentence, we suggest ending this after 'Settlement Boundary' (i.e., delete 'of the emerging Joint Local Plan'). As stated in para 5.2, this Plan intends to set its own settlement boundary.

With regard to Policy BTN 4, and as referred to above, please ensure that if needed there is consistency between Diagram 2 on page 26 of the Plan and any site concept plan shown in the submitted Masterplanning Report.

Policy BTN 8 - ALLS, and para 7.7

As per our Reg 14 response, we have no objection in principle to Policy BTN 8 which proposes to carry forward the Special Landscape Area designation and rename this as an 'Area of Local Landscape Sensitivity'. This approach is now well established across many neighbourhood plans.

Our query relates to para 7.7 which refers to a separate 'Special Landscape Area Appraisal'. This was also mentioned in the Reg 14 version Plan. Its absence was not queried by us at the time but, looking again at the submitted evidence documents this appears to be missing.

- **Qstn for the PC:** Please can you direct us to a copy of the 'SLAA' document so that we can make it available for others to view on our Beyton NP webpage.

Policy BTN 9 – Biodiversity

The Councils Biodiversity Officer welcomes the inclusion of information on the valued biodiversity features within the parish, notes the public's desire for more natural habitat, and the involvement of the Beyton Environmental Group (the BEG) in pursuing these aspirations (para 7.18).

There is scope to improve on the level of biodiversity information provided by, for example, carrying out an audit of and mapping the ecological features, providing a base line condition assessment, and identifying areas of highest value and those at risk. If this is something that the BEG are interested in, and if they have not already made those links, please let us know so that we can help put them in touch with relevant organisations such as the Suffolk Wildlife Trust.

Policy BTN 16 – Design Considerations

A minor observation. In criterion d.i., the Appendix cross reference numbers need amending. [Appendix 2 = Listed Buildings, Appendix 3 = Buildings of Local Significance]

Policies Map

Two minor observations:

- Subject to any other decisions made re the Important Public Views, it appears that 'View 15' has been cropped off the Inset Map South. It could (should) be added to the main Policies Map, as has been done with View 21.
- The Policies Map Key correctly refers to Local Green Space (BTN 11) but, on the Inset Maps, the local green spaces are all prefixed BTN12-x.

* * * * *

Suggestion for revised Appendix 1 [See comments on BTN 2 above]

Address	Summary of Proposal	Mid Suffolk ref.	Net Dwellings
Permissions not completed at 1 April 2018 as identified in the Mid Suffolk Strategic Housing and Economic Land Availability Assessment - October 2020 (NB - some will now have been built)			
Vacant plot btwn Pipits and Rivendell, Bury Road	1no. two storey detached dwelling with basement. Det. double garage. New access.	M/2177/15/ FUL	1
Land adjacent Fieldgate, Church Road	1no. 1 & a half storey 2 bed cottage	M/2365/16/FUL	1
Land east of The Grange, Tostock Road	2no. detached two storey dwellings, each with a single storey double garage.	M/2638/16/FUL	2
Rear garden to 2 Balmedie House, Bear Meadow	1no. detached one and half storey dwelling.	M/3895/16/OUT	1
* Land at Guerdon Cottage, Drinkstone Road	Plots 1 & 1A: 2no. 3-bed detached dwellings and detached garages (previously approved as 2no. semi-det' dwellings under M/1540/13)	M/0833/17/FUL	2
* Land adjacent Guerdon Cottage (adj. The Laurals, Tostock Road)	1no. 3-bed one-and-half storey dwelling. (Change to allow access from Drinkstone Road rather than private drive adjacent to 'The Laurals')	M/0834/17/FUL	1
* Plot 2, Land N of Guerdon Cottage, Drinkstone Rd	1no. detached 4-bed dwelling (Previously 4-bed one-and-half storey dwelling approved under 0675/15)	DC/17/02792/FUL	1
* Guerdon Cottage, Drinkstone Road	Variation of Condition 2 attached to permission 0314/16. 1no. 4-bed detached house	DC/17/03664/FUL	1
* Land adjacent to Guerdon Cottage, Drinkstone Road	1no. 4 bedroom dwelling (Plot 5) with integral garage	DC/17/05731/FUL	1
		Total	11

Net new dwellings granted planning consent between 1 April 2018 and 1 January 2021			
Nursery House, Tostock Road [See BTN 3]	Erection of 1 dwelling	DC/19/05050	(1)
Beyton Nurseries, Tostock Road [See BTN 3]	Erection of 9 dwellings	DC/19/02829	(9)
Land adj Grange Cottage, Tostock Road	Erection of 1 dwelling	DC/19/00698	1
* Land adj Guerdon Cottage, Drinkstone Road	Proposal for 1 additional new 3-bed detached dwelling behind Plots 1 & 1a	DC/19/00782	1
		Total	2 (12)

** The Guerdon Cottage site has been subjected to numerous planning applications. At the time of writing six dwellings have been or are almost complete in construction terms. A proposal for a seventh dwelling (approved under DC/19/00782) may still come forward so is included above.*

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(3) EAST SUFFOLK COUNCIL

E from: East Suffolk Council
Rec'd: 11 April 2023
Subject: RE: Consultation on R16 Beyton N'hood Plan (Mid Suffolk DC)

Thank you for consulting East Suffolk Council. The neighbourhood area appears to be a considerable distance from East Suffolk and we have no comments to make.



Dickon Povey MRTPI | Principal Planner (Policy and Delivery)

East Suffolk Council

01502 523043 | 07810 053973

www.eastsuffolk.gov.uk

www.eastsuffolkmeansbusiness.co.uk

Our ambition is to deliver the best possible quality of life for everyone who lives in, works in and visits East Suffolk.

We are East Suffolk

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(4) ANGLIAN WATER

E fm: Tessa Saunders | Spatial Planning Advisor
Rec'd: 26 April 2023
Subject: RE: Consultation on R16 Beyton N'hood Plan (Mid Suffolk DC)

Dear Community Planning Team,

Thank you for inviting comments on the Beyton Neighbourhood Plan Reg 16 consultation. Please find attached our response to the consultation. I would be grateful if you could provide confirmation that our comments have been received.

Kind regards,

Tessa Saunders MRTPI | Spatial Planning Advisor



Tessa Saunders MRTPI
Spatial Planning Advisor

Mobile: 07816 202878

Web: www.anglianwater.co.uk
Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon,
Cambridgeshire, PE29 6XU



Anglian Water Consultation Response

Beyton Neighbourhood Plan Reg. 16 Consultation

1. Anglian Water

- 1.1. Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.
- 1.2. Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, above and beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

2. Anglian Water and Neighbourhood Development Plans

- 2.1. Anglian Water is the statutory water and sewerage undertaker for the Beyton neighbourhood plan area and is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources.

3. Commentary on the Beyton Neighbourhood Plan

- 3.1. Anglian Water welcomes the opportunity to comment on the Beyton Neighbourhood Plan. The following comments are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water.

Policy BTN 1 Spatial Strategy

- 3.2. We recognise the amendments to the policy which leave matters such as development in the open countryside to either national or Local Plan policies.

Policy BTN 11 - Local Green Spaces

- 3.3. We have network assets that intersect with some of the proposed areas of LGS - however we do not consider that the policy should prevent any operational development that may be needed to manage, maintain or repair our assets.

Policy BTN 16 Design Considerations

- 3.4. Anglian Water supports the Beyton Design Codes which have informed the policy approach. We particularly welcome the design principles that take a proactive approach to mitigating and adapting to climate change. Climate change has significant implications for our operations and managing our networks, we therefore support design measures which seek to minimise flood risk through nature-based solutions such as SuDS, and improve water efficiency through fixtures and fittings in new buildings, and utilising rainwater harvesting and greywater recycling.
- 3.5. We are supportive of the policy and the requirement for development proposals to demonstrate how they comply with the design checklist and specifically to ensure that surface water run-off is minimised. We suggest that the wording of clause i. Is amended to be consistent with the national policy and guidance, and advice set out in the Beyton Design Codes. However, this clause could easily reference Policy BTN 19 Flooding and Sustainable Drainage to clarify the approach to surface water management.

i. Ensure surface water is managed on site, prioritising the use of sustainable drainage systems, so runoff does not exceed greenfield runoff rates.

Policy BTN 17 Sustainable Building

- 3.6. We support the policy requirements particularly in relation to water efficient measures such as rainwater/storm water harvesting and greywater recycling that minimises potable water use in new buildings. This also helps to reduce energy use in new developments as considerable energy is used to heat water.

Policy BTN 19 - Flooding and Sustainable Drainage

- 3.7. We welcome the policy and focus on the use of SuDS to manage surface water run-off in new development, which helps to minimise surface water infiltration to our foul drainage network. This approach aligns with the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024. However, we welcome this policy to ensure SuDS are incorporated in new developments, until the Schedule is formally implemented, and the necessary measures are in place.
- 3.8. As indicated above under Policy BTN 16, we would recommend that reference is made to run-off rates not exceeding greenfield rates. Or the supporting text referencing appropriate local guidance such as the Suffolk SuDS Guide¹.

4. Conclusion

- 4.1. Anglian Water is supportive of the Beyton Neighbourhood Plan including the approach to surface water management and design, subject to the clarifications provided.

¹ <https://www.suffolk.gov.uk/asset-library/2023-sf3967-scc-suffolk-flood-risk-appendix-a2.pdf>

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(5) WATER MANAGEMENT ALLIANCE

E from: Water Management Alliance
Rec'd: 3 March 2023
Subject: RE: Consultation on R16 Beyton N'hood Plan (Mid Suffolk DC)

Good Afternoon,

Thank you for your consultation on the Beyton Neighbourhood Plan 2018-2037.

Please be advised that the parish of Beyton lies outside the Internal Drainage District (IDD) of the East Suffolk Internal Drainage Board (IDB), as well as the Board's wider watershed catchment (a copy of our watershed catchment area map can be found on our website: [ESIDB: Watershed Catchment Area \(wlma.org.uk\)](https://www.wlma.org.uk)). Therefore, the Board has no comments to make.

Kind Regards,



Will Chandler BSc (Hons), MCIWEM

Sustainable Development Officer

Water Management Alliance

m: 07826 940760 | dd: 01553 819630 | William.Chandler@wlma.org.uk

Registered office: Pierpoint House, 28 Horsley's Fields, King's Lynn, Norfolk, PE30 5DD
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WMA members: [Broads Drainage Board](#), [East Suffolk Drainage Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [South Holland Drainage Board](#), [Waveney, Lower Yare and Lothingland IDB](#) in association with [Pevensey and Cuckmere Water Level Management Board](#)

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(6) NATIONAL HIGHWAYS



Our ref: Mid Suffolk DC/Beyton NP

Your ref: Beyton NP Reg 16 Consultation

'Beyton NP Consultation'
c/o Spatial Planning Policy Team
Babergh & Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich, Suffolk, IP1 2BX

Shamsul Hoque
National Highways
Spatial Planning, Operations (East)
Woodlands
Manton Lane
Bedford MK41 7LW

28 March 2023

Via email to communityplanning@baberghmidsuffolk.gov.uk

Dear Caileigh Gorzelak,

**Consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)–
Submission draft Beyton Neighbourhood Development Plan 2018 - 2037**

Thank you for your correspondence, dated 03 March 2023, notifying National Highways of your draft Neighbourhood Development Plan 2018-2037 dated January 2023.

National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding the Neighbourhood Plan, National Highways have responsibility for the trunk road A14 Junction 46.

We previously commented on an earlier version of the plan we stated the following in the highlighted sections below:

Highway Network issues: Beyton is a historical village, rural in nature. The Parish is situated south of A14 junction 46, part of the Strategic Road Network (SRN).

Previous study (Speedwatch) initiative has identified –

“on an average weekday just over 6,000 vehicles enter into the village from all directions- that equates to 11,000 trips in and out of Beyton every weekday” (para 11.3).

There is a perceived problem of through traffic from Tostock Road, A14 westbound exit slip (para 11.2 and 11.4) through to the rail station at Thurston to the north of the A14. Many commuters from the village also make this journey.

In the long term, Beyton residents wish to see the construction of further on/off slips to the A14 westbound carriageway (para 11.8). DfT’s Circular 02/2013 “The Strategic Road Network and the Delivery of Sustainable Development” paragraphs 37 - 44 copied below, states-

ACCESS TO THE STRATEGIC ROAD NETWORK

The creation of new accesses to the strategic road network can impact on its ability to fulfil the function of facilitating the safe and effective movement of goods and people in support of economic growth by compromising traffic movement and flow.

In delivering economic growth at local level, it is essential that the wider economic needs of the country are not compromised. New accesses to busy high speed strategic roads lead to more weaving and turning manoeuvres, which in turn create additional risk to safety and reduce the reliability of journeys, resulting in a negative impact on overall national economic activity and performance.

Where appropriate, proposals for the creation of new junctions or direct means of access may be identified and developed at the Plan-making stage in circumstances where it can be established that such new infrastructure is essential for the delivery of strategic planned growth.

Where the strategic growth test cannot be met there will be no additional junctions with, or direct means of access to, motorways and other routes of near motorway standard other than for the provision of signed roadside facilities for road users, maintenance compounds and, exceptionally, major transport interchanges.

Where access is agreed for such development, the Highways Agency will be unable to support any subsequent change in permitted land use that retained the agreed access. Further through access to other developments will not be permitted.

Access to motorways and routes of near motorway standard for other types of development will be limited to the use of existing junctions with all-purpose roads. Modifications to existing junctions will be agreed where these do not have an adverse impact on traffic flows and safety. In line with the standards contained in the Design Manual for Roads and Bridges, for safety and operational reasons, direct connections to slip roads and/or connector roads will not be permitted.

The Highways Agency will adopt a graduated and less restrictive approach to the formation or intensification of use of access to the remainder of the strategic road network. However,

the preference will always be that new development should make use of existing junctions. Where a new junction or direct means of access is agreed, the promoter will be expected to secure all necessary consents, and to fund all related design and construction works.

In addition, in terms of capacity enhancement DfT's 02/2013 Circular states, "Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs."

National Highways (previous Highways England) Comments to the Regulation 14: We are not aware of any aspirations in the local plan for new connections on to/off of the A14, one would only be considered at a local plan stage and if a Strategic Growth test could be met.

Comments from National Highways related to this Regulation 16:

Transport and Traffic (paragraph 11.8): In relation to Highways Network issues, our current position remains the same as when we previously responded in the Regulation 14 stage. For any new highway connections either westbound or eastbound direction of travel at Junction 46 of the A14 (part of the Strategic Road Network), this would only be considered at a local plan stage and if a Strategic Growth test could be met.

Noise Pollution: Paragraph 7.10 recommends having acoustic/noise fence along elevated sections like bridges areas on A14, where there are no trees acting as screening (para 11.9). Proposed to 'provide traffic noise screening as an amenity prerequisite for any future development'.

National Highways (previous Highways England) Comments to the Regulation 14: It is recognised that noise emanating for vehicles using the A14 can be an issue for both existing and new developments. Research has shown that if noise generating sources are not directly visible this can have an impact on perceived noise levels. We will work with developers where appropriate to mitigate the impacts of noise. However, policy doesn't allow the erecting of noise fencing within the highway boundary.

Comments from National Highways related to this Regulation 16:

Noise Pollution (paragraph 11.9): In relation to mitigating the acoustic/noise impact while noise may be originating from vehicles using the A14, we will work with the developers to reduce the impact of noise. However, our policy doesn't allow the erecting of any noise barrier/fence with the National Highway's land boundary.

Housing target: The draft Joint Local Plan between Babergh and Mid-Suffolk District Council has identified a need to deliver at least 10,165 homes with a provision of 12,616 homes between 2018 and 2037 across Mid Suffolk area. It is noted that this



Neighbourhood Plan provides for around 43 additional dwellings to be developed in the same period 2018-2037 (Policy BTN 2). Whereas a minimum of 30 new homes including outstanding planning permissions in Beyton Parish Council.

National Highways (previous Highways England) Comments to the Regulation 14: In terms of those small number of homes allocated on site locations within Beyton Parish Council area, there is unlikely to be any severe impact on the A14, part of SRN.

However, these housing allocations in the Joint Local Plan are likely to have a cumulative impact on the SRN this has been accessed using the County Councils strategic model and is broadly acceptable. However, we request that the promoters of these sites engage as early as possible with us to understand how their individual impact on A14 will be managed.

Comments from National Highways related to this Regulation 16:

Housing: In relation to proposed housing allocations, National Highways previously stated in our Regulation 14 response that the promoters of any newly allocated housing site should engage with us so we understand how the housing development site's individual impacts on the A14 (part of the Strategic Road Network, SRN) will be managed.

Please contact us PlanningEE@nationalhighways.co.uk if you require any clarification on these points mentioned-above.

Yours sincerely,

S. H.

Shamsul Hoque

Assistant Spatial Planner

Email: Shamsul.Hoque@highwaysengland.co.uk

(7) RESIDENT - MR ROGERS

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 J. Rogers
Job Title (if applicable):	Chartered Surveyor
Organisation / Company (if applicable):	N/A
Address:	The Old Mill The Green Beyton Bury St Edmunds
Postcode:	
Tel No:	
E-mail:	

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

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.		Policy No.	2
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	
Support with modifications		Have Comments	X

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

POLICY BTN 2 - HOUSING DEVELOPMENT

The Neighbourhood Plan

May I suggest the Neighbourhood Plan should focus on the density of proposed developments for new homes in the village. The recent developments in Beyton are an extension of Moreton Hall, not a village, with high density housing being shoehorned into sites to maximise profits and add little value to village communities over future decades.

Net zero carbon homes would also be another requirement, maximising passive solar design, solar energy, ground source heat pumps and high quality energy efficient glazing. This may put off high density developers and be more suitable to more ethical developers focused on quality and value.

There is also very little provision for couples living in large executive homes in the village that may wish to downsize. Smaller homes with gardens would suit villages better.

During a recent client meeting with a prominent industry Eco developer, he stated 'We cannot shape our communities for the next generation with outdated mindsets'.

An interesting point!

This isn't a rant at anyone in the village, just a reflection of planning directives over recent times that don't look to the future, merely today.

What improvements or modifications would you suggest?

Please ensure housing densities are reflective of a rural setting.

Most recent development in Beyton over the last 30 years are of similar densities to inner city/town densities, not spread out to reflect the rural setting where density levels should be considerably lower.

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

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

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

The 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 final 'making' (adoption) of the Beyton NP by Mid Suffolk District Council	

Signed:

Dated:

Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.		Policy No.	12
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Do you support, oppose, or wish to comment on the above? (Select one answer below)

Support		Oppose	X
Support with modifications		Have Comments	

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

*POLICY BTN 12 - BUILDINGS OF LOCAL SIGNIFICANCE
non-designated heritage asset*

19a. The Old Mill, Thurston Road

My property is The Old Mill.

I don't know when the industrial usage ceased but do know the building remained empty and stood derelict for many years.

Also to note, the building is not listed. The initial planning application for this site in 1999 planned to demolish the vacant and dilapidated Mill and to build four new properties on the site. The parish council applied for a building preservation order and the necessary listed building consent but the DCMS rejected the application. The developer did however revert his plans and fully refurbished both parts of the Old Mill into two properties.

I do not wish to have our property included on your list of buildings of local significance. Such buildings are not particularly environmentally friendly and are unsuitable for conversion to modern energy/heating methods.

With regards to the character of the village, this has changed dramatically over the last fifty years with developments such as Field Close, The Birches, Manor Farm, Bear Meadow and Rectory Gardens plus an array of bungalows around the village green, all providing little character to the village and a multitude of executive houses nearly touching each other.

I have raised my objection with the local parish do-gooders/councillors to my building being listed for historical and architectural value as this was not designed or built for residential usage.

As I work in the construction and property industry, it is key to embrace modern design and construction methods that promote energy efficiency, which traditional design and outdated construction methods do not. Sticking with the past is not the answer to current and future challenges in the property sector.

During a recent client meeting with a prominent industry Eco developer, he stated 'We cannot shape our communities for the next generation with outdated mindsets'.

An interesting point!

This isn't a rant at anyone in the village, just a reflection of planning directives over recent times that don't look to the future, merely today.

What improvements or modifications would you suggest?

The local people who have professionally cobbled this plan together have ignored my request to omit my property and aren't even able to get the property address correct which sums up the state of the people forcing their demands on the owners of property without their consent.

Please omit my property from this designation.

(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 matter through the written representations.

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

The 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 final 'making' (adoption) of the Beyton NP by Mid Suffolk District Council	

Signed:	Dated:
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(8) MR LIVALL

E from: Mr Livall
Rec'd: 24 April 2023
Subject: Beyton Neighbourhood Plan 2018-2037 Submission Plan Representations

For the attention of Beyton NP Consultation, c/o Spatial Planning Policy Team

Dear Mr Bryant

Beyton Neighbourhood Plan 2018-2037 Submission Plan Representations

I have recently had the pleasure of viewing the Beyton Neighbourhood Plan 2018-2037 Submission Plan which in general terms I consider to be a very well written and concise Plan. A fundamental flaw is that it does not provide up-to-date biodiversity information in accordance with the National Planning Policy Framework. A supporting Biodiversity Evaluation Report has not been provided and in this respect the Beyton Neighbourhood Plan compares most unfavourably with the recent Hoxne Neighbourhood Plan Reg 16 Submission consultation (15 Feb to 31 Mar 2023) which contains a 45-page Evaluation Report: <https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Hoxne-NP-SD8-Landscape-Biodiversity-Evaluation.pdf>

The omission of a supporting Biodiversity Evaluation Report / Ecological Assessment / Parish Biodiversity Action Plan with the Submission Plan is most disappointing and fails to recognise the national concerns expressed by Sir David Attenborough and others highlighting that "nature is in crisis" and the desire for local action. I have become increasingly concerned that some Parish Councils may choose [*perhaps on the grounds of financial expediency, insufficient time or lack of ecological expertise*] not to use or give any weight to the relevant biodiversity guidance and tools at their disposal. Biodiversity regrettably appears to still remain a soft option that may give rise to negative responses both from Parish Councils and their professional advisors.

I make a number of objections to the Reg 16 Submission Plan [<https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Beyton-NP-Sub-Draft-Jan23.pdf>], all of which relate to biodiversity.

Objection 1:

The Submission Plan fails to recognise or relate to national concerns that "nature is in crisis".

Refer: United Nations Environment Programme [<https://www.unep.org/facts-about-nature-crisis>] and UK's People's Plan for Nature [<https://www.weforum.org/agenda/2023/04/attenborough-people-s-plan-nature-uk/>].

Objection 2:

The Parish Council has not provided up-to-date biodiversity information with their Submission Plan, including ecological / wildlife corridor network maps and data on priority species etc. The Plan therefore does not accord with the relevant sections of the National Planning Policy Framework [namely Paras 8, 28, 31, 174, 175 and 179].

Objection 3:

The Parish Council has not provided evidence that it is accurately assessing and promoting “the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species.” *The Submission Plan therefore does not accord with the relevant sections of the National Planning Policy Framework [namely Paras 8, 28, 31, 174, 175 and 179].*

Objection 4:

Policy BTN9 of the Submission Plan has been written without supporting evidence. *The Plan therefore does not accord with the relevant sections of the National Planning Policy Framework [namely Paras 8, 28, 31, 174, 175 and 179].*

I acknowledge that in Paragraph 7.18 of the Submission Plan reference is made to community aspirations and actions to boost biodiversity in the future. I make a strong case that ecological survey work should be undertaken to feed into the Plan preparation process itself before the Regulation 16 stage is reached.

If the Parish Council is able to address the objections that I have raised it will establish a stronger policy framework for emerging development proposals that may impact upon the biodiversity resource of the Parish, in particular wildlife corridor / hedgerow connectivity.

I would be grateful if you will kindly acknowledge receipt of my representations.

Kind regards

Richard Livall

[Ends]

(9) DEFENCE INFRASTRUCTURE ORG., obo the MOD



Defence
Infrastructure
Organisation

Christopher Waldron

Ministry of Defence

Safeguarding Department

DIO Head Office

St George's House

DMS Whittington

Lichfield

Staffordshire WS14 9PY

Your reference: Beyton Neighbourhood
Development Plan 2018 - 2037 draft
Consultation under Regulation 16

Mobile: +44 (0) 7800 505824

E-mail: [DIO-Safeguarding-
Statutory@mod.gov.uk](mailto:DIO-Safeguarding-Statutory@mod.gov.uk)

Our reference: 10058227

christopher.waldron861@mod.gov.uk

Caileigh Gorzelak
Strategic Planning Policy Officer
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

26th April 2023

Dear Caileigh

It is understood that Babergh and Mid Suffolk District Councils are undertaking a consultation regarding their Beyton Neighbourhood Development Plan 2018 - 2037 draft under Regulation 16. This document will guide the future development of the parish.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

The MOD may be involved in the planning system both as a statutory and non-statutory consultee with statutory involvement stemming from consultation occurring as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

The MOD have an interest within the area covered by the Beyton Neighbourhood Development Plan 2018 - 2037 draft Consultation as it contains areas that are washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites. Wattisham Station, located to the South-East, benefits from safeguarding zones drawn to preserve the airspace above and surrounding the aerodrome to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. New development may have detrimental impacts depending on site location relative to safeguarded sites and assets. Additionally, Wattisham Station is washed over by a statutory birdstrike safeguarding zone, designed for birdstrike risk to be identified and mitigated. RAF Honington, located to the North West is additionally washed over by a birdstrike statutory safeguarding zone.

Within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, such as green and/or brown roofs/roof gardens on flat roof buildings, as well as the creation of new waterbodies. Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, and associated ponds and wetlands provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation.

The MOD should be consulted within the Beyton Neighbourhood Development Plan 2018 - 2037 of any potential development within the statutory technical safeguarding zones that surround Wattisham Station which consists of structures or buildings exceeding statutory safeguarding technical criteria, or any development in the statutory birdstrike safeguarding zone surrounding RAF Honington and/or Wattisham Station which includes schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

C Waldron

Chris Waldron
DIO Assistant Safeguarding Manager

(10) - Late rep: Historic England



Historic England

Miss Caileigh Gorzelak
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Rd
Ipswich
Suffolk
IP1 2BX

Direct Dial: [REDACTED]

Our ref: PL00570221

28 April 2023

Dear Miss Gorzelak

Ref: Beyton Regulation 16 Neighbourhood Plan Consultation

Thank you for inviting Historic England to comment on the above consultation.

Unfortunately we do not currently have capacity to provide detailed comments on the Submission version of this plan. We would refer you to any detailed comments we may have made at earlier stages of the plan's production including Regulation 14 and where it was required, SEA screening/scoping and draft report stages.

Our detailed advice on successfully incorporating historic environment considerations into neighbourhood plan, alongside some useful case studies, can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

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.

Please do contact me, either via email or the number above, if you have any specific queries arising following this stage, and we will endeavour to assist at that time.

Yours sincerely,

Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
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