

## Mid Suffolk District Council



## Drinkstone Neighbourhood Development Plan

### Submission Consultation Responses

In November 2019, Drinkstone 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 16 December 2019 until Friday 7 February 2020.

In total, 8 organisations submitted representations, one of which is recorded as a late response.

All are listed below and copies of their representations are attached.

Ref No.	Consultee
(1)	Natural England
(2)	Historic England
(3)	Anglian Water
(4)	National Grid
(5)	Highways England
(6)	West Suffolk Clinical Commissioning Group
(7)	Mr Mutimer (Local Resident)

Ref No.	Late Representation
(8)	Environment Agency



## (1) NATURAL ENGLAND

Date: 09 January 2020  
Our ref: 303737  
Your ref: Drinkstone Neighbourhood Plan



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Mr P Bryant  
Babergh & Mid Suffolk District Councils  
[communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)

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

**BY EMAIL ONLY**

T 0300 060 3900

Dear Mr Bryant

### **Regulation 16 for the Drinkstone Neighbourhood Plan**

Thank you for your consultation on the above dated 13 December 2019

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 Regulation 16 for the 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](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Joanne Widgery  
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/)<sup>1</sup> 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](#)<sup>2</sup>.

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

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/)<sup>5</sup> website and also from the [LandIS website](http://www.landis.org.uk/)<sup>6</sup>, which contains more information about obtaining soil data.

## Natural environment issues to consider

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

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<sup>1</sup> <http://magic.defra.gov.uk/>

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

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

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

<sup>5</sup> <http://magic.defra.gov.uk/>

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

<sup>7</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/807247/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf)

<sup>8</sup> <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](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. 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](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> 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](#)<sup>13</sup>.

## **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.

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

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

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

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

<sup>13</sup> <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](#) <sup>14</sup>).
- 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).

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<sup>14</sup> <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/>

## (2) HISTORIC ENGLAND



Historic England

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

Direct Dial: [REDACTED]

Our ref: PL00453802

3 February 2020

Dear Mr Bryant

### **Ref: Drinkstone 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 wish 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  
Edward.James@HistoricEngland.org.uk

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
HistoricEngland.org.uk







### (3) ANGLIAN WATER

For Office use only:

#### 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 Ltd
Address:	Thorpe Wood House, Thorpe Wood, Peterborough, Cambridgeshire.
Postcode:	PE3 6WT
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 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.	DRN3
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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 note that it is proposed to allocate sites for residential development which currently have the benefit of planning permission. Anglian Water has no objection to the principle of residential development on the sites identified in the Neighbourhood Plan.

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

*(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	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the Drinkstone NDP by Mid Suffolk District Council	<input checked="" type="checkbox"/>

**Signed: Stewart Patience**

**Dated: 21<sup>st</sup> January 2020**

## 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.	DRN13
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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:**

Reference is made to development proposals demonstrating sustainable design and construction measures including water efficiency/re-use which is fully supported.

Anglian Water is actively promoting increased water efficiency and water re-use as part of new residential developments. Reference is made to rainwater harvesting but not stormwater harvesting (where surface water is captured in a pond or tank) in the final part of the policy.

Also reference is made to grey water harvesting. It is assumed that this term is intended to refer to water recycling systems that capture and treat uses water so it can be reused which can include greywater reuse. For clarity it is suggested the term 'grey water recycling' is used.

We note that it is proposed to amend the policy to include reference to 'recycling' to follow the existing text.

Anglian Water welcomes the additional wording but would ask that it be amended for consistency with our previous comments.

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

We would therefore suggest that the wording of Policy DRN13 be amended as follows:

'e. incorporate sustainable design and construction....and grey water **recycling** / rainwater **and stormwater** harvesting.'

*(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.

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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 final 'making' (adoption) of the Drinkstone NDP by Mid Suffolk District Council	✓

**Signed: Stewart Patience**

**Dated: 21<sup>st</sup> January 2020**

Our Ref: MV/ 15B901605

T: +44 (0)191 261 2361  
F: +44 (0)191 269 0076

16 January 2020

**avisonyoung.co.uk**

**Via email only**  
Planning Policy  
Mid Suffolk Council

Dear Sir / Madam

**Regulation 16 consultation on the Drinkstone Neighbourhood  
Development Plan  
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/](http://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](http://www.energynetworks.org.uk)

Information regarding the gas distribution network is available by contacting:

[plantprotection@cadentgas.com](mailto: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](mailto:nationalgrid.uk@avisonyoung.com)

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

**Spencer Jefferies, Town Planner**

[box.landandacquisitions@nationalgrid.com](mailto: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

0191 269 0094

[matt.verlander@avisonyoung.com](mailto: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](http://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](http://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:

- National Grid's Plant Protection team: [plantprotection@nationalgrid.com](mailto: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>





## (5) HIGHWAYS ENGLAND



Our ref: Drinkstone Reg 16  
Your ref:

Paul Bryant  
Neighbourhood Planning Office  
Babergh and Mid District Councils  
Endeavour House,  
8 Russell Road,  
Ipswich  
IP1 2BX

Via Email

Dear Sir,

### **Drinkstone Regulation 16 consultation**

Thank you for your consultation.

We welcome the fact that the promotion of sustainable development and transport is promoted in your plan despite the challenges thrown up by the rural nature of the area.

The focusing of development adjacent to the existing settlement is possibly the option which would have the least impact upon the SRN. The impact of these proposal should have been picked up in the evidence base for the West Suffolk Local plan.

Yours faithfully

Mark Norman  
Assistant Asset Manager  
Operations (East)  
Email: [mark.norman@highwaysengland.co.uk](mailto:mark.norman@highwaysengland.co.uk)

Mark Norman  
Operations - East  
Woodlands  
Manton Lane  
Bedford MK41 7LW

Direct Line: [REDACTED]

5 February 2019



## (6) WEST SUFFOLK CCG

**From:** Crisell Chris (Suffolk NHS)  
**Sent:** 04 February 2020 10:04  
**To:** BMSDC Community Planning  
**Cc:** TAYLOR, Jane (NHS NORTH EAST ESSEX CCG)  
**Subject:** Drinkstone NP Response

To the Chair of Drinkstone Parish Council

Thank you for consulting West Suffolk Clinical Commissioning Group on the latest stage of your Neighbourhood Plan.

I am delighted to inform you that having read the latest version of the plan (submitted in November 2019) the CCG can find no reason to object to any of the policies within it and is very happy to see paragraph 2.23 included after the first consultation. As mentioned in the previous response the CCG is closely monitoring the housing development in the area and along with our planning and infrastructure colleagues at Babergh and Mid Suffolk Councils have been working on an Infrastructure Delivery Plan.

Due to the previous response still being the most relevant to the current position of the CCG no further comment will be made at this stage.

Kind Regards

**Chris Crisell**  
Estates Project Manager  
Ipswich & East Suffolk CCG & West Suffolk CCG  
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX  
[chris.crisell@suffolk.nhs.uk](mailto:chris.crisell@suffolk.nhs.uk)

[www.westsuffolkccg.nhs.uk](http://www.westsuffolkccg.nhs.uk)

[www.ipswichandeastsuffolkccg.nhs.uk](http://www.ipswichandeastsuffolkccg.nhs.uk)





DRINKSTONE NEIGHBOURHOOD PLAN

For Office use only:

BABERGH DISTRICT COUNCIL  
Part's A & B  
PLANNING POLICY

Section One: Respondents Details

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

<b>Part A: Respondent</b>	RICHARD MUTIMER
Title / Name:	/
Job Title (if applicable):	/
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	

E-mail:

<b>Part B: Agents -- Please complete details of the client / company you represent</b>	
Client / Company Name:	
Address:	
Postcode:	/
Tel No:	

E-mail:

15 JAN 2020

PLANNING POLICY

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.	10	Policy No.	DRN6
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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:

Please be as brief and concise as possible ..

AS PER ATTACHED LETTER AND EXHIBITS.  
MARKED RMI TO RMB

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

OMIT OUR LAND KNOWN AS CHAPEL MEADOW  
SHOWN ON RMI, FROM DRN6 AREA OF LOCAL  
LANDSCAPE SENSITIVITY.

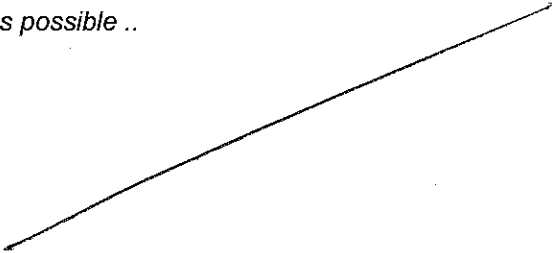
(Continue on separate sheet if necessary)

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.

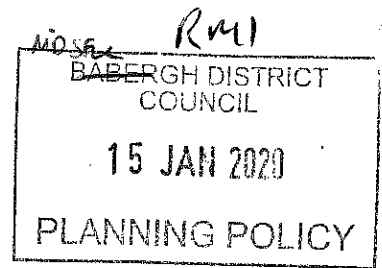
Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

<b>I consider that a hearing should be held because ...</b>
<i>Please be as brief and concise as possible ..</i>

<i>(Continue on separate sheet if necessary)</i>

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

The publication of the recommendations of the Examiner	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the Drinkstone NDP by Mid Suffolk District Council	<input type="checkbox"/>

<b>Signed:</b>	<b>Dated:</b> 12/01/20
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Richard Mutimer

12 January 2020

Dear Independent Examiner,

Reference: Drinkstone Neighbourhood Plan.

I am writing to you to voice my concerns about the Drinkstone Neighbourhood Plan. As I believe the Drinkstone Parish Council are not following the protocols and procedures as required and are ignoring our written concerns regarding issues raised on the pre-submission consultation response forms. I will outline the problem from my perspective:

When the Drinkstone Neighbourhood Plan was published in detail I could see that an area of land at the end of Chapel Land, Drinkstone, which my wife and I own but do not live at. It is approximately 3 acres of paddocks for grazing, stables and a barn. Had been included in an area the Parish Council wanted to make into a new Special Landscaping Area. I have attached a copy of a Land Registry plan showing our land outlined in red.

The Parish Council then asked the residents opinion on the plan and to reply via a Pre-Submission Consultation Response Form. This I did and explained that it was our opinion the proposed plan was flawed in respect of our land, for the following reasons:

1. We have not been directly consulted in relation to the inclusion of our land as a Local Landscaping Sensitivity Area.
2. We have seen no evidence that a suitable qualified body has undertaken the technical assessment. The policy lacks credibility in this regard as on the face of it the assessment appears little more than a joining up exercise to link two existing Special Landscape Areas in the parish.
3. The plan suggests that the refined boundary is a result of detailed field study work. If this is so, the report showing the findings of the field study should be shared and this should show the various constituent parts of the new SLA have been properly rated on a scale of sensitivity with all the relevant issues having been taken into account.

We also stated our land is secluded and not accessible to the public and cannot be viewed by anyone other than a few private landowners who abut our property. As such, there is no public benefit in classifying this land as a sensitive area.

I submitted my response on the Pre-Submission Consultation Response Form along with a supporting letter (copy attached). The Parish Council published on its web-site a document titled 'Responses received to Pre-Submission Consultation, Responses to Comments and Proposed Changes'. The Council's reply to my issues shown above were as follows:

1. There is no legal requirement, other than at the Pre-Submission Consultation stage of preparing the Plan and at subsequent stages, to consult on proposals in the plan. However, the proposed area of Local Landscape Sensitivity was identified in the display of the emerging content of the Neighbourhood Plan at a widely publicised drop-in event on the 16 February 2019 and 22 June 2019.
2. A Local Landscape Appraisal was undertaken and published alongside the draft Neighbourhood Plan as part of the Pre-Submission consultation and will be submitted as part of the examination of the Plan by an independent Examiner. The appraisal sits within a hierarchy of National and Suffolk Landscape Character Assessments and follows the same principles used in those studies. The Landscape Appraisal was carried out by the Natural Environment Sub-Group led by a retired Landscape Architect, former member of the Landscape Institute (LI) and past chairman of the LI Admissions Panel. He worked for Suffolk County Council for over 30 years as Senior Landscape Officer and Environment Manager. He



Rm2

was responsible for the preparation of the Suffolk Landscape Character Assessment and is an authority on landscape characterisation.

3. The Landscape Appraisal explains how the Area of Local Landscape Sensitivity was refined as a result of detailed field work to follow physical features on the ground such as field boundaries. The new Area of Local Landscape Sensitivity incorporates the meadows and paddocks around Drinkstone Green and Drinkstone Street which give rise too so much of the character of the area adjoining the settlement boundaries. Chapel Meadow clearly shares the same landscape characteristics of a small to medium sized fields bounded by species rich hedgerows and hedgerow trees. The Landscape Appraisal also identifies 13 key views, one of which is the view towards Drinkstone Green from Park Road near Whitefields House; The hedgerows trees in and around Chapel Meadow form part of this view. Hard copies of the Landscape Appraisal were made available at the public drop in session and can be viewed on the Neighbourhood Plan section of the Drinkstone Website.

The Parish Council also stated the public benefit of individual parcel of land is not one of the criteria that inform whether a landscape is an Area of Local Landscape Sensitivity.

As as result of the above comments the council stated 'We do not feel that we can support these reasons and that the Plan should not be amended. However, it may be that the independent Examiner will come to a different conclusion'.

My problem is still that no one have ever contacted us directly about the inclusion of our land in this proposal or replied to our letter. No one has ever visited our land to carry out any type of survey of the land, hedgerows and trees. No one has ever communicated directly with us at all. When I look at the published Local Landscape Appraisal regarding our land, it does not mention our land, there are no pictures of our land, it does not even refer in general to our land. The only thing in the Appraisal that is vaguely close to our land is on page 26 (copy attached) which under the heading Key Views, references view 7 which is a view from Park Road toward our land but from a long distance away (please note it is no 8 list below the plan, the numbers on the plan are incorrect). So where is the detailed field study of our land which should show the constituent parts rated on a scale of sensitivity with all the relevant issues taken into account?

This still appears to be the Parish Council wanting to joining up two existing areas of Special Landscape Sensitivity which would include our land, and wanting to do it without following the correct protocols in order to get what they want, how can they do this without without a technical assessment having been carried out?

I note the Parish Council rely heavily on the 'Natural Environment Report and Local Greenspace Assessment' to justify the process being correctly followed and the inclusion of our land in the Special Landscape Area. But under section 3 entitled Hedgerows, it shows a survey carried out in 2010-11 which is out of date and inaccurate, for example some of the hedgerows have been removed and no longer exist. Also our 3 acres of land at the end of channel lane was not included in this survey, as shown on the attached copy of this survey.

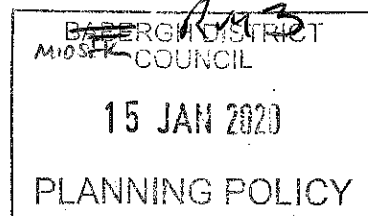
For these reasons I believe our land at the end of chapel lane know as Chapel Meadow, should not be included in the Drinkstone Parish Plan under heading DRN6 - Area of Local Landscape Sensitivity.

Regards,

Richard Mutimer.

Copy: Jo Churchill MP.

**These are the notes referred to on the following official copy**



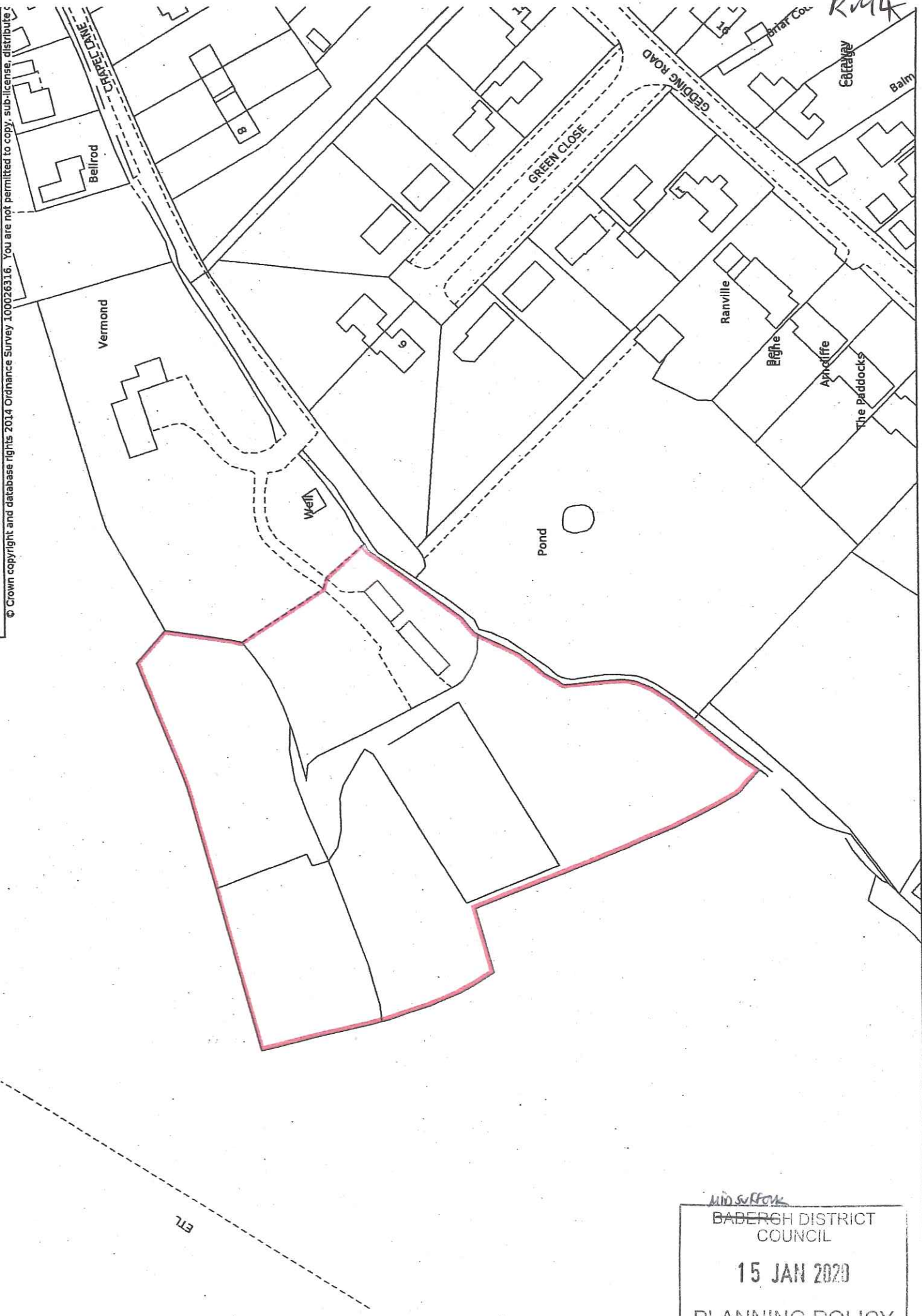
The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

This official copy is issued on 17 September 2019 shows the state of this title plan on 17 September 2019 at 19:35:54. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

This title is dealt with by the HM Land Registry, Kingston Upon Hull Office.



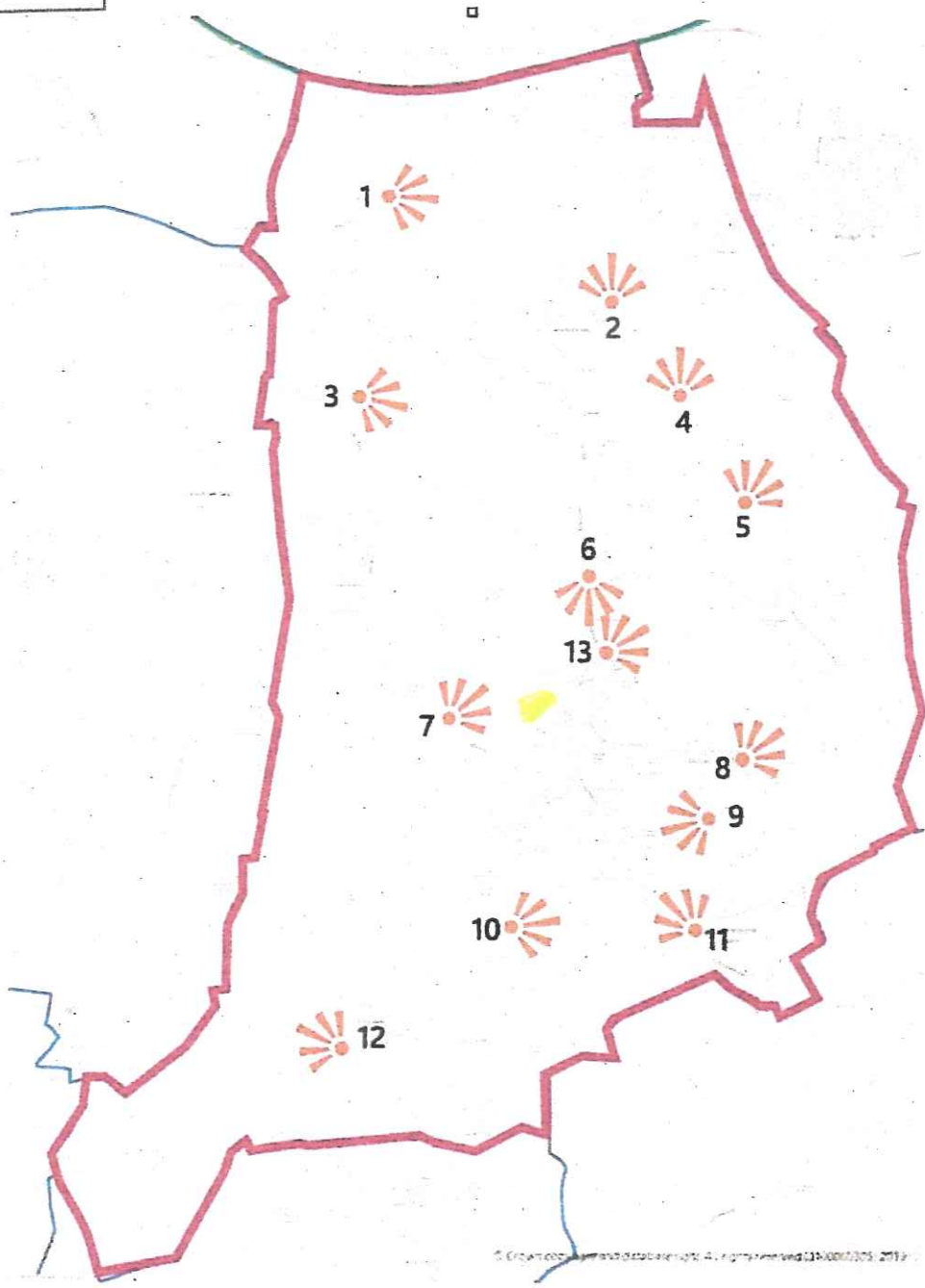
Mid Suffolk  
 BABERGH DISTRICT  
 COUNCIL  
 15 JAN 2020  
 PLANNING POLICY

15 JAN 2020

PLANNING POLICY

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OUR LAND  
CHAPEL MEADOW



Key views

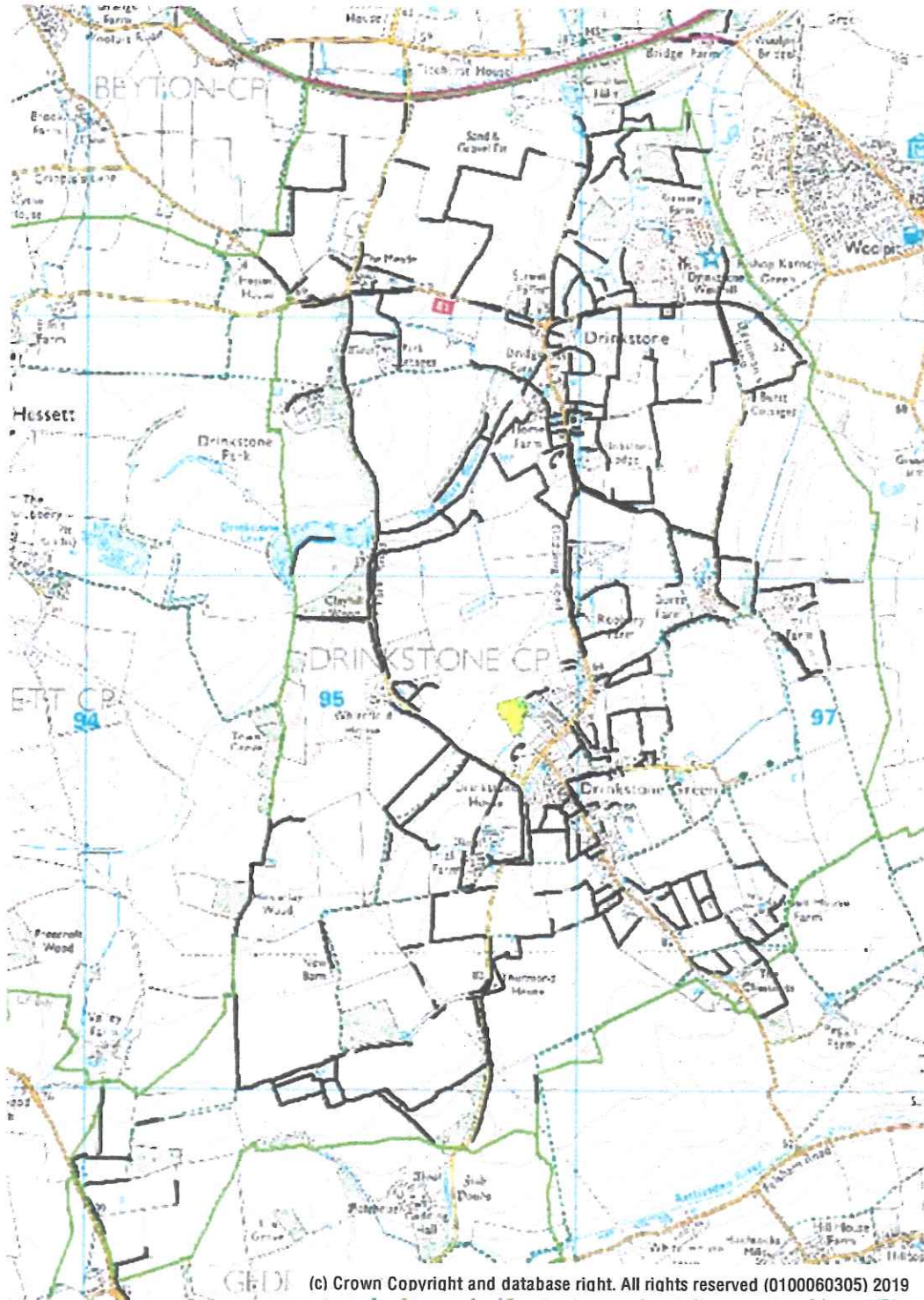
- |   |   |
|---|---|
| 1. View from Tostock Road across Meade Farmlands      | 8. View towards Drinkstone Green from Park Road near Whitefield House |
| 2. View along Black Bourn Valley from Drinkstone Road | 9. View across open farmland from Footpath 9 near Lane End Cottage    |
| 3. View towards All Saints Church from Park Road      | 10. View towards Drinkstone Green from Footpath 10                    |
| 4. View towards Drinkstone Mills from Footpath 2      | 11. View to Drinkstone Green from Gedding Road south of Hall Farm     |
| 5. View along Deadman's Lane                          | 12. View along Rattlesden Road Drinkstone Green                       |
| 6. Views towards Drinkstone Green near Rookery Farm   | 13. View west across farmland from Bucks Wood Footpath 4              |
| 7. View from Village Hall towards Burts Farm          |   |

15 JAN 2020

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### 3. Hedgerows, veteran and significant trees

A hedgerow survey of the parish was carried out by local volunteers as part of the wider Suffolk Hedgerow Survey between 2010-11. This recorded 46km of hedgerow at a density of 5.07 kms per square km, which puts Drinkstone in the top quartile for the County of Suffolk. 77.6% of these hedgerows are species rich (8 or more species) compared to the County average of 51.7%. (3)



OUR LAND  
CHAPEL MEADOW.

**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.	10	Policy No.	DRNG
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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:

Please be as brief and concise as possible ..

IN SUPPORT OF MY OPPOSITION LETTER SENT IN WITH THE PRE-SUBMISSION CONSULTATION RESPONSE FORM, I HAVE NOW EXAMINED THE LANDSCAPE APPRAISAL DOCUMENT IN MORE DETAIL. I NOTE THE PARISH COUNCIL RELY HEAVILY ON THE 'NATURAL ENVIRONMENT REPORT AND LOCAL GREENSPACE APPRAISMENT'. BUT THIS REPORT IS OUTDATED. FOR EXAMPLE UNDER SECTION 3 HEDGEROWS, IT SHOWS A SURVEY CARRIED OUT IN 2010-11. IT ALSO SHOWS OUR LAND WAS NOT INCLUDED IN THE SURVEY AS I HAVE SHOWN ON THE COPY ATTACHED. I SUGGEST THIS SURVEY IS TOO OUT OF DATE TO BE ACCURATE AND CAN NOT BE USED TO SUPPORT THE PARISH COUNCIL'S SUBMISSIONS IN FAVOUR OF OUR LAND BEING INCLUDED IN THE SPECIAL LANDSCAPE AREA.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Please be as brief and concise as possible ..

OMIT CHAPEL MEADOW FROM THE SPECIAL LANDSCAPE AREA DRNG. AS PER MY LETTER DATED 17/9/19 (COPY ATTACHED).

(Continue on separate sheet if necessary)

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	<input checked="" type="checkbox"/>
The final 'making' (adoption) of the Drinkstone NDP by Mid Suffolk District Council	<input type="checkbox"/>

**Signed:**

**Dated:**

3/2/20.

BABERGH DISTRICT  
COUNCIL  
10 JAN 2020  
PLANNING POLICY

10 JAN 2020

PLANNING POLICY

Richard & Rachel Mutimer

17th September 2019

Dear Councillors

**Drinkstone Neighbourhood Plan  
Pre-Submission Consultation Response**

We have considered the Neighbourhood Plan and are concerned by the proposed inclusion of our property in the new Special Landscape Area. We set out below our reasons for not supporting Policy DRN6. We feel strongly enough about the issue to have sought legal advice on the matter which supports our views set out below.

We own approximately three acres of land known as Chapel Meadow which is at the end of Chapel Lane. The property comprises paddocks, stable, barn and yard. It is shown edged in red on the attached plan.

We believe that the assessment resulting in our property being included is flawed for various reasons, including:

1. We have not been directly consulted in relation to the inclusion of our land.
2. We have seen no evidence that a suitably qualified body has undertaken the technical assessment. The policy lacks credibility in this regard as on the face of it the assessment appears little more than a joining up exercise to link the two existing Special Landscape Areas in the parish.
3. The plan suggests that the refined boundary is the result of detailed field study work. If this is so, the report showing the findings of the field study should be shared and this should show the various constituent parts of the new SLA have been properly rated on a scale of sensitivity with all relevant issues having been taken into account.

Our land is secluded and not accessible to the public and cannot be viewed by anyone other than the few private landowners who abut our property. As such, there is no public benefit in classifying the land as a sensitive area.

For the above reasons, we should be grateful if you would please omit our land from the proposal.

Yours sincerely

Richard Mutimer

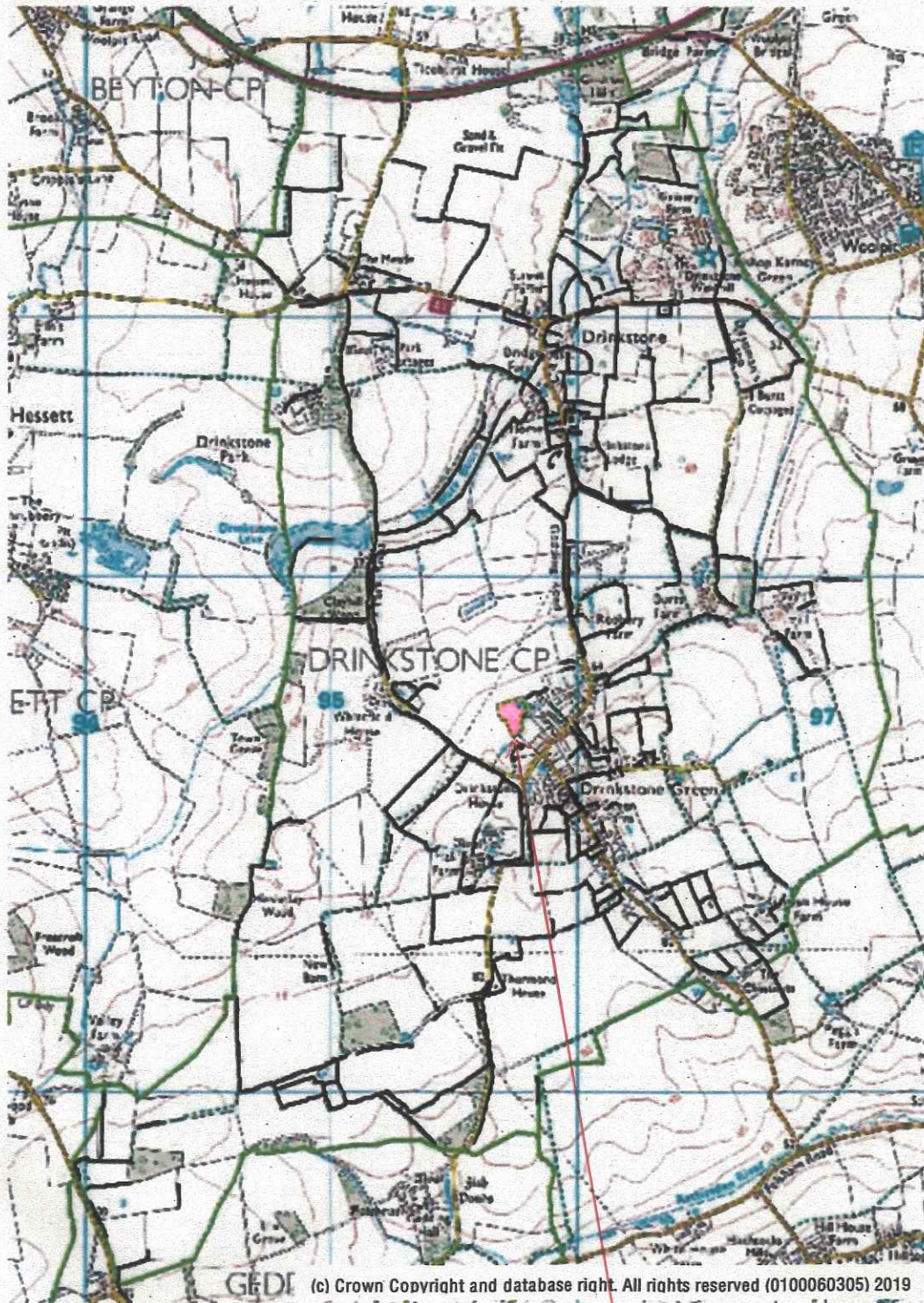


10 JAN 2020

PLANNING POLICY

### 3. Hedgerows, veteran and significant trees

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CHAPEL MEADOW  
OUR LAND





Ms Hillary Workman  
Drinkstone Parish Council  
123 York Road  
Bury St. Edmunds  
IP33 3EG

**Our ref:** AE/2020/124835/01-L01  
**Your ref:** Drinkstone – Regulation 16  
**Date:** 07 February 2020

Dear Ms Workman

**DRINKSTONE NEIGHBOURHOOD PLAN REGULATION - 16 CONSULTATION**

**DRINKSTONE, SUFFOLK**

Thank you for your consultation dated 13 December 2019. We have reviewed the Regulation 16 Submission Draft for the Drinkstone Neighbourhood Development Plan and are satisfied with the Plan document; although with regards to our comments provided to the Parish at the Regulation 14 Consultation, some have not been fully incorporated into the plan.

We are however, satisfied that these issues are comprehensively catered for within other local and national planning legislation and documentation. These include comments relating to; protected species, fluvial flooding, the sequential/exception tests and we are content that the references to hedgerows and woodland in the Plan show these issues have been considered by the Plan.

We have no further comments to make as the Plan currently does not allocate any specific sites for development in addition to the sites which have already been granted planning permission, and are listed in policy DRN3 of the revised plan. Future growth plans and development in the parish should refer to the need to apply the sequential approach to direct development to areas of lowest flood risk.

We trust that this advice is useful.

Yours sincerely

**Mr Mark Macdonald**  
**Planning Advisor**

Direct dial [REDACTED]

Direct e-mail [REDACTED]

Environment Agency  
Cobham Road, Ipswich, Suffolk, IP3 9JD.  
Customer services line: 03708 506 506

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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