

Babergh District Council

Acton Neighbourhood Plan 2022 - 2037



Reg 16 Submission consultation responses

On 29 September 2023, Acton Parish Council (the 'qualifying body') submitted their Neighbourhood Development Plan to Babergh District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from 23 October 2023 until 6 December 2023.

Twelve representations were received. They are listed below and copies are attached.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Babergh District Council
(3)	Natural England
(4)	Historic England
(5)	Environment Agency
(6)	National Highways
(7)	Avison Young obo National Grid
(8)	Avison Young obo National Gas
(9)	Suffolk Wildlife Trust
(10)	Water Management Alliance
(11)	Lavenham Parish Council
(12)	Resident - Purser

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(1) SUFFOLK COUNTY COUNCIL

Date: 6 December 2023
Enquiries to: Georgia Teague

Email: neighbourhoodplanning@suffolk.gov.uk



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

Dear Mr Bryant,

Submission Consultation version of the Acton Neighbourhood Plan

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

Paragraph 3.5

SCC welcomes the amendments made to paragraph 3.5 to include recognition of the Suffolk Minerals and Waste Local Plan 2020 as a local plan document.

However, we would recommend the following addition in the text as it highlights relevant safeguarding actions required from policies in the Minerals and Waste Local Plan, which are a material consideration.

“In addition, it should be noted that the Adopted Development Plan for the area also includes the Suffolk Minerals and Waste Local Plan 2020. *The settlement is located within the Suffolk County Council “Minerals Consultation Area” within which proposals in excess of five hectares will be referred to the County Council in order that they can be satisfied that, in accordance with paragraph 143 of the NPPF, minerals resources of local and national importance are not needlessly sterilised by non-mineral development*”

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

(2) BABERGH DISTRICT COUNCIL

Our ref: Acton NP R16 Response
Dated: 6 December 2023

From: Planning Policy Team, BMSDC
To: Janet Cheesley, NP Examiner
cc: Andrea Long (NP Consultant) Lee Adams (Chairman of NP Steering Group), Graham Round (Chairman of Acton Parish Council)

Dear Janet,

- 1. Acton Neighbourhood Plan 2022 - 2037**
- 2. Reg 16 Submission Consultation – Comments from Babergh District Council**

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

Babergh District Council welcomes the changes that have been made to the Acton Neighbourhood Plan (the 'Plan') in response to our previous consultation response.

Since the Plan was submitted, Part 1 of the Babergh and Mid Suffolk Joint Local Plan (JLP) has been adopted by both councils. Notably, this removes allocations, settlement boundary and the settlement hierarchy that were identified in the draft Joint Local Plan, submitted for examination in 2021. The adopted Part 1 JLP supersedes the 2006 Babergh Local Plan and Core Strategy. There is currently no adopted settlement hierarchy, and the spatial strategy is to be addressed in the Part 2 JLP. Further information on this and a copy of the Part 1 JLP can be found on our website here: <https://www.babergh.gov.uk/joint-local-plan>

For this reason, we suggest some updates to the plan to ensure it is as up to date as possible and in line with district level policy, while acknowledging that the plan was written to be aligned with the policies that were adopted at the time. We have also suggested some changes in order to enhance clarity around rural exception sites and repeat comments on the proposed housing figure. We do not believe any of these changes significantly alter the plan.

Also, a reminder that small updates will be required as the plan progresses such as to the process diagram (figure 1) and paragraphs 1.10-1.13

We trust that all of our comments are helpful.

Yours sincerely

Caileigh Gorzelak
Planning Policy Officer
Babergh & Mid Suffolk District Councils
T: 01449724595

E: Caileigh.gorzelak@baberghmidsuffolk.gov.uk / Communityplanning@baberghmidsuffolk.gov.uk



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www.babergh.gov.uk / www.midsuffolk.gov.uk

Reg 16 Submission draft Acton Neighbourhood Plan 2022 - 2037

Comments and further observations from Babergh District Council

1. Joint Local Plan References

As explained in the covering letter, the Part 1 JLP has been adopted since the plan was submitted. We suggest the following updates to the plan.

Paragraph	
1.6	“...In practice, higher level planning documents such as the emerging Joint Local Plan for Babergh and Mid Suffolk...”
3.2	“... <u>It was agreed that</u> Part 1 of the Local Plan will <u>would</u> contain the strategic policies and development management policies for the two districts except for the spatial distribution/settlement hierarchy, open spaces, and site-specific allocations. Part 1 with modifications was published for consultation, in March 2023 and the Inspectors’ Report was published in September 2023. <u>Part 1 was adopted by both councils in November 2023.</u> Part 2 of the Local Plan will contain those other elements and is expected to be concluded in 2025. The BMSJLP, along with any Neighbourhood Plan, provides the basis for determining planning applications and future development in the local area and should be consistent with the National Planning Policy Framework.”
3.5	“ <u>During the preparation of the Neighbourhood Plan</u> Currently, the statutory development plan for the area consists <u>consisted</u> of the Babergh Core Strategy adopted in 2014 and the saved policies in the Babergh Local Plan adopted in 2006. The Plan period for the Core Strategy runs <u>ran</u> to 2031 and the emerging <u>now adopted</u> Joint Local Plan looks to 2037. <u>As referred to above, Babergh District Council has replaced those documents with the new Part 1 Joint Local Plan</u> As referred to above, Babergh District Council is in the process of replacing those documents with a new Local Plan (BMSJLP). In addition, it should be noted that the Adopted Development Plan for the area also includes the Suffolk Minerals and Waste Local Plan 2020.” <i>Figure 14 also to be updated</i>
3.6	“Acton is <u>was</u> identified as a <i>hinterland village</i> in the settlement hierarchy of the now superseded <u>adopted</u> Core Strategy under Policy CS2, which looks to the period 2031. The Core Strategy approach to development in hinterland villages is <u>was</u> that most new development (including employment, housing, and retail, etc.) in Babergh will be directed to the towns/urban areas in preference to the <i>core villages</i> and then <i>hinterland villages</i> . <u>No settlement hierarchy is identified in the adopted Joint Local Plan Part 1 and housing need will be addressed in the Part 2 document.</u> In all cases, the scale and location of development will depend upon the local housing need, the role of settlements as employment providers and retail/service centres, the capacity of existing physical and social infrastructure to meet forecast demands and the provision of new/enhanced infrastructure, as well as having regard to environmental constraints and the views of local communities as expressed in parish, community, and neighbourhood plans. Hinterland villages are only required to provide for development that meets their own identified needs”.



Figure 15	“Figure 15: Acton Built Up Area as defined in the Adopted Babergh Local Plan 2006. Built-up-area boundary shown in orange. Areas of predominantly green space shown in green. Please note: this plan <u>boundary may</u> will be superseded by <u>in</u> the new JLP Part 2 once adopted.”
3.7	“The <u>submitted</u> draft BMSJLP (<u>November 2020</u>) identified Acton as a core village , i.e. further up the settlement hierarchy than previous plans...”
7.2	“Government guidance contained in the NPPF advises that Neighbourhood Plans must be in general conformity with the strategic policies contained in any development plan that covers the Neighbourhood Area. The adopted strategic policies for the Acton Neighbourhood Area are those outlined in Chapter 3 . The adopted policies are in the process of being superseded by the BMSJLP. However, the delays experienced in the Local Plan process and the consequent decision by the districts to divorce the spatial strategy from the remaining policies has complicated the policy context for emerging Neighbourhood Plans and made the landscape for progressing them considerably less certain.”
7.3	<p>Site 1 “...The site lies outside of the adopted settlement boundary for Acton, as shown in <u>Figure 15</u> the Adopted Core Strategy, and is not proposed as an allocation in the emerging BMSJLP. It is, however, included within the proposed settlement boundary contained in the emerging BMSJLP, which, as described in earlier chapters, has been paused. The site is undeveloped.</p> <p>Site 2 “...This site lies outside of the adopted settlement boundary for Acton, as shown in <u>Figure 15</u> the Adopted Core Strategy, but was proposed for allocation in the emerging BMSJLP. This site is under construction and is substantially completed at the time of writing (January 2023).”</p> <p><i>Note: The Part 1 JLP does not propose new settlement boundaries and does not include housing allocations.</i></p>
7.7	<p>“a) The fact that the Neighbourhood Area was designated after the emerging BMSJLP was submitted for examination, therefore Acton did not feature in the table in the draft plan, which set out the housing figures for the designated Neighbourhood Areas.</p> <p>b) The indicative figure of 213 appeared later, in September 2021, as part of the Local Plan <u>Inquiry examination</u> evidence....</p> <p>c) Other factors adding to the uncertainty include the inconsistency between the way that the two committed sites were treated in the emerging <u>draft</u> BMSJLP: The Tamage Road site was proposed as an allocation, whilst the Barrow Hill site was not. However, it had been included within the proposed revised settlement boundary.</p> <p>d) The BMSJLP inspectors have since requested that the Council remove the site allocation policies from the emerging BMSJLP and to reappraise the position in <u>a Part 2 document</u>.</p> <p>.....</p> <p>f) The settlement hierarchy in the emerging <u>draft</u> plan classifies <u>classified</u> Acton as a Babergh Core Village. <u>Within the superseded development plan</u> In the adopted plan, Acton is classed as a hinterland village. The BMSJLP inspectors have advised that the revised settlement hierarchy in the emerging plan be withdrawn <u>and potentially appear in the Part 2 BMSJLP</u>. Therefore, it remains unclear whether Acton’s position in the final</p>



	settlement hierarchy will remain as hinterland village or will change up a tier to a core village. This will depend upon the criteria employed by the District to determine the settlement hierarchy. This has significant implications on the level of growth expected to be accommodated within the parish.”
7.10	“... Both the Adopted Core Strategy (Policy CS4, which covers the Chilton Woods development) and emerging policy in the BMSJLP, covering settlement pattern, Both the adopted BMSJLP (policy LP01) and saved policy CS4 in the Core Strategy make reference to the need to ensure that new development does not result in the visual or physical coalescence of settlements...”
8.3	“the emerging BMSJLP policies already require that development proposals create...”
9.25	“The parish is was identified in the adopted Core Strategy as a Hinterland Village and in the emerging draft BMSJLP as a Core Village...”
10.3	“The emerging BMSJLP under Policy SP05 identifies the existing industrial estate at Bull Lane as a <i>strategic employment site</i> ... The strategic employment sites which includes Bull Lane are to be protected by the emerging Local Plan policies and their proposed expansion supported in principle.”
10.9	“ The strategic policies Policy LP09 in the emerging BMSJLP supports the change of use to small scale employment where the hours of operation are compatible with residential use and the business use does not involve significant dust, noise, fumes and outdoor storage which could adversely affect local amenity.”

2. Housing figure

We commented on the indicative housing figure, as it was understood at the time, in our reg14 response. We have also noted the Parish Council’s response to this as set out in their consultation statement.

Supporting text indicates that an acceptable figure would be 75 new dwellings over the plan period which has been met by the Tamage Road development.

We have no objection to that position at this time. However, as mentioned in our reg14 representation, we may find it necessary to make further allocations in Acton through the Part 2 JLP to meet the districts housing requirements.

3. Views

An additional view has been added to the plan since the Reg14 draft with there now being 11 numbered views.

For clarity, we would recommend separating views 3a and 3b so that there would be 12 numbered views that then correlate with the policies map(s).



4. Rural Exception Sites

We would recommend the heading before paragraph 7.45 is reworded as ‘Local Connection Criteria for Rural Exception Sites’

To avoid incorrectly implying that the statement refers to all affordable housing over the plan period we suggest rewording the penultimate sentence of paragraph 7.45 to read:

“This is applicable to affordable housing that may be delivered in the parish through rural exception sites over the Plan period and that ~~affordable~~ this housing should remain available to meet identified housing needs in perpetuity and should be secured through a legal agreement.”

We recommend that Footnote 17 (which currently incorrectly appears as footnote ‘10’) is replaced with: “as set out in Annex 2 of the NPPF”

Other

- We note the addition of reference to the councils’ Local Cycling and Walking Infrastructure Plan in paragraph 9.5. It would be useful to include a link to this as a footnote. See: <https://www.babergh.gov.uk/sustainable-travel/>
- Figure 3b shows a yellow circle on the map – presumably a Grade II* building. This should be identified in the key within the map description.
- All 4 maps are referred to as ‘inset maps’ which is inaccurate. The whole parish policies map should appear first with the heading ‘Appendix E: Policies Maps – Map 1: Whole Parish Policies Map’. Followed by the Acton Village Map – Inset 1 then Newmans Green and Bull Lane as Inset Maps 2 and 3.
- The Acton Design Guidelines and Codes should refer to the **2023** National Planning Policy Framework. Page 9 of the document should also be updated to reflect the changes to the District level planning policy context as explained above.

[end]



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Date: 05 December 2023
Our ref: 455485
Your ref: Acton Neighbourhood Plan

(3) NATURAL ENGLAND



Mr Paul Bryant
Babergh & Mid Suffolk District Council

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

BY EMAIL ONLY

paul.bryant@babergmidsuffolk.gov.uk

T 0300 060 3900

Dear Mr Bryant

Acton Neighbourhood Plan – Regulation 16 Consultation

Thank you for your consultation on the above dated 20 October 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

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

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

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

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

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

Yours sincerely

Sally Wintle
Consultations Team

(4) HISTORIC ENGLAND



Historic England

By e-mail to:
Paul Bryant
Neighbourhood Planning Officer
Babergh & Mid Suffolk District Councils

Our ref:
Your ref:
Date: 07/12/2023

Direct Dial: [REDACTED]
Mobile: [REDACTED]

Dear Mr Bryant,

Ref: Acton Neighbourhood Plan Regulation 16 Consultation

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

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

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

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

Yours sincerely,

Ross McGivern
Historic Places Adviser, East of England
Ross.mcgivern@HistoricEngland.org.uk



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



(5) ENVIRONMENT AGENCY



Paul Bryant
Babergh and Mid Suffolk District Council
Spatial Planning Policy Team
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Our ref: AE/2023/128957/01-L01
Your ref: Reg' 16 consultation
Date: 27 November 2023

Dear Paul

CONSULTATION UNDER REG' 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012: THE ACTON NEIGHBOURHOOD PLAN 2022 - 2037

ACTON

Thank you for consulting us on the reg 16 submission plan for the Acton Neighbourhood Plan.

We regret that at present, we are unable to review this consultation. We have had to prioritise our limited resource and must focus on influencing plans where the environmental risks and opportunities are highest.

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

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

Environmental Constraints

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

Flood Risk

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

On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints. Nevertheless, we recommend the inclusion of relevant policies to cover the management of flood risk. Allocation of any sites and any windfall development delivered through the Plan period should follow the sequential approach. [National Planning Policy Framework](#) (NPPF) paragraph 161 sets this out.

Water Resources

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

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

Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via

borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licencing strategies (CAMS process) - GOV.UK (www.gov.uk).

Informatives

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

Source Protection Zones

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

We trust this advice is useful.

Yours sincerely



Mr Andrew Thornton
Planning Advisor

Direct dial: [REDACTED]

Mobile: [REDACTED]

Direct e-mail: [REDACTED]

Team e-mail: Planning.EastAnglia@environment-agency.gov.uk

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(6) NATIONAL HIGHWAYS



Our ref: NH/23/03304 Acton N'hood Plan (REG 16)
Your ref: Acton Neighbourhood Plan (REG 16)

'Acton NP Consultation'
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

22 November 2023

Via email to: communityplanning@baberghmidsuffolk.gov.uk

Dear Paul Bryant,

1. **Consultation under Regulation 16 of Neighbourhood Planning (General) Regulations 2012 (as amended)**
2. **Submission draft Acton Neighbourhood Development Plan 2022 - 2037**

Thank you for your correspondence, dated 20 October 2023, notifying National Highways of the above-mentioned consultation under Regulation 16.

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 Acton Neighbourhood Plan, we have responsibility for the trunk roads, A14 (located on the north and east), A12 (located on the southeast), and A120 (located on the south).

During previous consultation response dated 17 May 2023, National Highways mentioned that the area and location that are covered by this Neighbourhood Plan, are remote from the nearest Strategic Road Network (SRN) junction. Consequently, these draft policies set out are unlikely to have an impact on the operation of the trunk road and National Highways offer No Comment.

We do not have any more comments on this.

Please contact us at PlanningEE@nationalhighways.co.uk if you require any clarification.



Yours sincerely,

S. H.

Shamsul Hoque
Assistant Spatial Planner

Informative:

Standing advice to the local planning authority

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

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

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

(7) AVISON YOUNG OBO NATIONAL GRID



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avisonyoung.co.uk

Our Ref: MV/ 15B901605



28 November 2023

Babergh District Council
communityplanning@baberghmidsuffolk.gov.uk
via email only

Dear Sir / Madam

**Acton Neighbourhood Plan - Regulation 16 Consultation
October – December 2023
Representations on behalf of National Grid Electricity Transmission**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document 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 Electricity Transmission

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, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (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. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

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

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



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

Distribution Networks

Information regarding the electricity distribution network is available at the website below:
www.energynetworks.org.uk

Further Advice

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

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

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

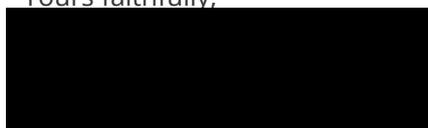
Ellie Laycock, Development Liaison Officer

box.landandacquisitions@nationalgrid.com

National Grid Electricity Transmission
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

For and on behalf of Avison Young

NGET 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.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET 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.

NGET'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.nationalgrid.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.

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

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

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(8) AVISON YOUNG OBO NATIONAL GAS



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NE1 3AZ

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avisonyoung.co.uk

Our Ref: MV/ 15B901605

28 November 2023



Babergh District Council
communityplanning@baberghmidsuffolk.gov.uk
via email only

Dear Sir / Madam

**Acton Neighbourhood Plan - Regulation 16 Consultation
October – December 2023
Representations on behalf of National Gas Transmission**

National Gas Transmission 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 Gas Transmission

National Gas Transmission 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.

Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

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

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

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

Distribution Networks

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

Further Advice

Please remember to consult National Gas Transmission 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

nationalgas.uk@avisonyoung.com

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

Kam Liddar, Asset Protection Lead

kam.liddar@nationalgas.com

National Gas Transmission
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

For and on behalf of Avison Young

National Gas Transmission 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.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission'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 Gas Transmission 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 Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com



Suffolk Wildlife Trust
Brooke House
Ashbocking
Ipswich
IP6 9JY
01473 890089
teamwilder@suffolk
wildlifetrust.org
suffolkwildlifetrust.org



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

7th November 2023

To Whom It May Concern,

Re: Acton Neighbourhood Plan Consultation (Regulation 16)

Thank you for sending us updated details of the Walsham-le-Willows Council Neighbourhood Plan, please see our comments below:

The Suffolk Wildlife Trust are pleased to see that this stage of the Neighbourhood Plan continues to support biodiversity in the local community through *Policy ACT4* along with its supporting information.

Within *Section 8: Environment* we support the references to the National Planning Policy Framework and its role in protecting the natural environment. *Section 8.2* considers Biodiversity Net Gain, and while we support the inclusion of this section, with Biodiversity Net Gain poised to become mandatory from January 2024, we believe that any final revisions should include an aspiration for development in Acton to deliver above the 10% minimum requirement for Biodiversity Net Gain. The Suffolk Wildlife Trust's stance is that to give confidence that a meaningful net gain, which contributes with certainty towards nature recovery, development should deliver a 20% net gain.

The plan includes a clear map showing both County Wildlife Sites and green corridors which provide good clarity. The additional inclusion of a blue corridor map showing water bodies is an excellent addition to the plan.

We are happy that the relevant Policy, ACT4, suitably protects the natural environment.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Alex Jessop
Planning and Advocacy Officer, Suffolk Wildlife Trust

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(10) WATER MANAGEMENT ALLIANCE

E from: Planning Department <Planning@wlma.org.uk>

Rec'd: 23 November 2023

Subject: RE: Acton NP - Consultation reminder & note re adoption of JLP Part 1 (Babergh DC)

Good morning,

Thank you for consulting us on the Acton Neighbourhood Plan.

The parish of Acton is outside of the Internal Drainage Districts and watershed catchments of the WMA Member Boards. Therefore, we have no comments to make.

Kind Regards,

Ella



Ella Thorpe BSc (Hons.), MSc, MCIWEM

Sustainable Development Officer

Water Management Alliance

dd: 01553 819630 | email: ella.thorpe@wlma.org.uk

Registered office: Pierpoint House, 28 Horsley's Fields, Kings Lynn, Norfolk, [PE30 5DD](postcodes:PE30 5DD)

t: 01553 819600 | e: info@wlma.org.uk | www.wlma.org.uk

What3Words: [caring.employ.visit](https://www.what3words.com/caring.employ.visit)

WMA members: [Broads Drainage Board](#), [East Suffolk Water Management Board](#), [King's Lynn Drainage Board](#), [Norfolk Rivers Drainage Board](#), [South Holland Drainage Board](#), [Waveney, Lower Yare and Lothingland Drainage Board](#)

In Association with: [Pevensey and Cuckmere Water Level Management Board](#)

Follow us:  [Twitter](#)  [Facebook](#)  [Instagram](#)  [LinkedIn](#)  [YouTube](#)



Your feedback is valuable to us, we continually review and work to improve our services. If you have any suggestions, recommendations, questions, compliments or complaints, please complete one of our online forms: [Feedback Form](#) | [Complaint Form](#)

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With our commitment to ISO 14001, please consider the environment before printing this e-mail.

Defenders of the Lowland Environment

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(11) LAVENHAM PARISH COUNCIL
LAVENHAM PARISH COUNCIL

The Parish Office
Church Street
Lavenham
Sudbury
Suffolk
CO10 9QT

Andrew Smith
Clerk to the Council
Telephone: 01787 247041

Email: andrew.smith@lavenham-pc.gov.uk

Mr Paul Bryant
Neighbourhood Planning Officer | Planning & Building Control
Babergh & Mid Suffolk District Councils
Endeavour House
8 Russell Rd
Ipswich
IP1 2BX

By email to: Paul.Bryant@baberghmidsuffolk.gov.uk

23rd November 2023

Dear Paul,

Re: Consultation under Reg' 16 of the Neighbourhood Planning (General) Regulations 2012: The Acton Neighbourhood Plan 2022 - 2037

Thank you for inviting Lavenham Parish Council to comment on the Draft Acton Neighbourhood Plan.

Lavenham shares a boundary with Acton parish which runs from a field just west of Washmere Green to a point on Bridge Street Road north-east of the Railway Walk. It includes the western edge of Lavenham Wood. We note three areas of joint interest.

Biodiversity/Environmental Matters

1. LNP2 Submission Draft Paragraph 6.8.3 says: A key statutory designation for biodiversity in Lavenham parish is the very eastern extent of the Lineage Wood & Railway Track Site of Special Scientific Interest (SSSI), which mostly falls in Acton Parish. LNP2 (Policy LAV 8) highlights the opportunities that exist in the landscape to the west of Lavenham for biodiversity measures to be implemented, which could complement the existing SSSI. There is obvious scope for collaborative working with our neighbouring parish.

Traffic/Road Safety

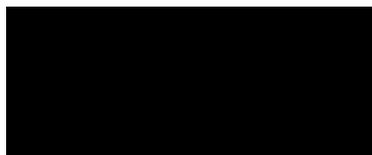
2. Acton Neighbourhood Plan identifies several concerns about traffic management and road safety, including a concern about HGV traffic using the road through Acton between Great Waldingfield and the A134 Long Melford by-pass to avoid Sudbury. This resembles our concerns about HGVs using the A1141 between Cockfield and Hadleigh, rather than keeping

to the A134 and A1071, and there is again obvious scope for collaborative working with our neighbouring parish.

Employment

3. The Bull Lane Strategic Employment Site is set to expand, and it should offer work opportunities for Lavenham residents within easy reach of our parish. As well as good road connections for private vehicles between Lavenham and the Site, the 753-bus route (roughly hourly, Monday to Saturday daytime) provides a public transport link. We should support this development and look to take appropriate positive advantage of it.

Yours sincerely



Andrew Smith
Clerk to Lavenham Parish Council



Page 1/3

3.12.2023

Babergh District Council

communityplanning@baberghmidsuffolk.gov.uk

Comments on Acton Neighbourhood Plan draft, September 2023

Page 5, Fig 2 – the version of the map has been superseded: land SW of the built up area (grid 445) is now built up. The map, Fig 6 is correct.

P 7 – 2.3, line 3woods for.....

P 8 – 2.5,

last line footpaths ARE for pedestrians, but these are not part of the PROW network.
Suggested - 'paths for pedestrian access'.

P 10 - 2.7 line 5the remains of the house.....

P 11 – 2.10 line 7areas of hardstanding.....

P 12 - 2.12 line 10 the text changes from 'avenue' to 'drive' which is confusing. Drive needs changing to avenue in lines 10 & 11.

P 12 - 2.13 The report (last line should reflect the development was 'built out' in March 2023.

P 12 - 2.15, line 1 replace 'does have' with 'has'.

P 14 - 2.19 line 3 replace 'outpost' with 'branch'.

P 14 – 2.20 line 2mostly on oil or electricity.

P 14 – 2.21 line 2store under the **Costcutter** brand.

P 15 – 2.23 line 2 Zumba is also a trademark

P 15 – 2.24.book sales....The art exhibition should be removed.

P 15 – 2.24 line 4net and a *boules* area.

P 15 – 2.24 last line Suggest adding: Defibrillator units are located at the shop and village hall.

P 15 – 2.25 line 2clay soils overlaid by areas of woodland, with far-reaching.....

P 15 – 2.26 last 2 lines. In fact deer are comparatively rare. The list misses grey squirrels. rabbits & hares which are more common than voles & otter.

Page 2/3

Page 16 Figures 7a and 7b are not printed in a legible way : there appear to be errors.

Page 17 – 2.28 line 2 coniferization is not a word from a dictionary : suggest 'Despite recent conifer plantations,

Floristically is also a non-dictionary word; suggest.....of flora-rich unimproved.....

Page 17 – line 4 In fact, it was an attempt to create a wetland environment . a bog rather than a pond, which would be a water hazard. It is in the process of being removed.

Page 19 – 2.34 penultimate line.....flooding: this means that each year that area has

2.35 line 1departures (from early morning to late evening) to Marks.....

2.36 Repeated information:

suggested, from line 4 Delete first sentence.....Melford Road, with the national 60mph limit before the 30mph applies at the settlement edge raises a particular safety concern.

P 22 – 2.39 line 7PROWs...(to be consistent with line 3)

P 24 - 2.43 line 2/3. Suggested: By far the greatest land use in Acton is agriculture, mainly arable, with some sheep. Most land is farmed under contract i.e those employed do not live in the parish.

Page 26 – 2.26 last lineswood pigeons, ring-necked doves, seasonal game birds and occasional birds of prey.

Page 40. DC/02751 has been abandoned as a housing project and has been gifted to the parish as an area for the public to enjoy. The Plan should state this.

Page 41. DC/03126 has been completed, but there are legacy issues on the inadequate site drainage and landscaping. There is an ongoing investigation by the Local Government Ombudsman into the actions of Babergh District Council on:

(a) the way planning permission was granted

(b) the fulfilment of the Planning Conditions.

7.4 is redundant.

Page 42

7.7 para 4 is also redundant

Page 83

9.14 The plan does not include the development of Acton Hall as a small industrial estate. Otherwise 'farm estates' are limited to (depending on definition) :

New Farm (now predominantly an agricultural contractors site)

Green Farm (now diversified into a camping/caravanning site as well as agriculture)

Cuckoo Tye Farm

Acton Place

Slough Farm

Page 3/3

The 'small amount' of farm machinery traffic is seasonal and has to use occasionally, not necessarily daily the narrow lanes mentioned in this report to access fields for cultivation and harvesting.

Page 86

9.25 This fails to emphasise that the emerging but highly delayed Local Plan spatial hierarchy has had to be radically revised on the instruction of the Plan Inspectorate. Community services provision has changed since the last District Plan..

Page 88

9.31. this does not address the fact that Acton as a parish within Babergh DC has a very low proportion of land designated as Public Open Space. The hectarage available in small areas adjacent to housing has to be compared to the overall size of the parish and that most land is fields for agriculture.

Page 90

10.3 line 1 delete *estate* and replace with *area*

Page 91

Suggested that 'Acton Industrial Estate' is deleted and just... Bull Lane Employment Area, Acton.... retained.

Page 93

10.11 line 2change it's use.....

Page 100 Property 11 line 4brick.....

Page 110

Marsh Walk

The description fails to note that the primary purpose of the Marsh Walk area is as an attenuation basin for surface water from the High Street and the Lime Tree Estate. It is, therefore, flooded regularly and only limited areas can be used for public access such as walking when that occurs.

Access to the on-line documents has been sporadic and further comment would have been made with identification of the page/section. For example. a map showing agricultural land ownership is slightly inaccurate.

A further point to be made is that some data from the 2021 Census has been included, but in other sections reliance is placed on the 2011 data. Uniformity should be possible by the end of 2023.

JHP /3.12.23

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