

Worlington Neighbourhood Plan

Parish Council response to Examiner's Clarification Note

March 2024

The Neighbourhood Plan Examiner published a Clarification Note on 29 February 2024. This paper provides the Parish Council's response to the questions raised in the Note.

Policy WTN5 – Local Green Spaces

The Examiner asks for the Parish Council's comments on the objections from the County Council to the designation of the following Local Green Spaces:

- Wide verge between The Paddocks and Golf Links Road
- Wide verge opposite Bell House
- Wide verge in front of 1 - 5 Walnut Grove, Freckenham Road

The County Council's objects to the designation of these spaces on the basis that the permitted development rights might change in the future and that, if so, the provision of footways over these areas might be more difficult.

Parish Council response:

The separate Local Green Space Assessment identifies how the spaces meet the criteria of the NPPF. In the unlikely event that permitted development rights relating to highway improvements were to change and require footways to require planning consent, this kind of development is of the nature which current NPPF Green Belt policy, against which proposals on Local Green Spaces would be considered, would support such proposals.

Policy WTN10 – Dark Skies

The Examiner asks whether a 'preference' for dark skies is capable of being implemented through the development management process?

Parish Council response:

The Parish Council acknowledges that a preference for dark skies may be difficult to implement through the development management process and puts forward potentially more appropriate wording for the first sentence as follows for the Examiner's consideration:

Wherever practicable, development proposals should respond positively to the dark sky environment of the parish and avoid the use of streetlights.

Policy WTN12 – Farm Diversification

The examiner seeks clarification of the term "Re-use for community or economic development purposes is preferred" and asks:

Is a 'preference' capable of being implemented through the development management process?

Are there activities other than employment or community uses which would be acceptable for redundant, traditional farm buildings?

Parish Council response:

The approach to this policy is on the basis that the Parish Council wishes existing farm enterprises to remain viable and it recognises that the diversification of uses can help maintain farm units. This is acknowledged in paragraph 4.5.43 of the Draft West Suffolk Local Plan (January 2024), which states:

Farm diversification has become an increasingly popular method to offset the continuing long-term falling prices for agricultural goods and reduced farm incomes and can include a range of types of development including farm shops, leisure and recreation, tourism related development, sporting activities, equestrian uses and farm-based food processing or packaging with associated storage.

The preference is therefore to enable farms to diversify rather than be lost.

The Parish Council acknowledges that there could be other acceptable uses in redundant, traditional farm buildings subject to there being an acceptable impact. The paragraph from the Draft Local Plan above notes such examples.

Representations

As requested by the Examiner, the Parish Council provides a table below with responses to the comments received, addressing in particular the points raised by:

- Suffolk Wildlife Trust;
- Upton Suffolk Farms; and
- Suffolk County Council.

This is followed by comments received by other bodies and individuals. Please note that the full response from the bodies is not reproduced in this table.

Summary Comment	Parish Council response
<p>Suffolk Wildlife Trust</p> <p>We recommend the addition of a map within the plan which shows the location of the County Wildlife Sites (CWSs) and Priority Habitats within the parish.</p> <p>We also recommend highlighting some of the rare species which have been recorded locally, which contribute to the wildlife value and character of the area. For example, several rare Breckland plant species have been recorded locally, as well as notable birds and mammals.</p>	<p>Appendix 1 already contains a map illustrating the priority habitats. It is not considered necessary to illustrate the County Wildlife Sites given that this information is not freely accessible to the public.</p> <p>This is not considered necessary.</p>

Summary Comment	Parish Council response
<p>Setting an aspiration for achieving a higher percentage of net gain could help to ensure that the biodiversity assets of Worlington are conserved and enhanced for future generations. Policy WTN 4 could include a statement in support of development where 20% BNG can be demonstrated in Worlington.</p>	<p>There is no evidence available to the Parish Council that 20% BNG would make development viable. It is noted that the Draft Local Plan (January 2024) only seeks 10% BNG and has moved away from the 20% suggested in the Preferred Options Local Plan (May 2022), so the Worlington Neighbourhood Plan is consistent with the Draft Local Plan.</p>

Upton Suffolk Farms	
<p>Paragraph 3.13 - Status and Timing of West Suffolk Local Plan.</p> <p>Paragraph 5.5 - The NDP does not properly acknowledge the context that one of the roundabouts at the Red Lodge A11 junction is in the parish.</p> <p>Paragraph 5.7 – the second part of the paragraph is unduly restrictive and should recognise existing land uses and the need for the ongoing diversification and economic development of the rural economy.</p> <p>Policy WTN1 - Lack of recognition in the draft NDP of the scope or need for development of strategic significance related to a higher order settlement (Red Lodge) located on a major road (the A11).</p> <p>Map 4 - The reference in the NDP’s text just above Map 4 to five distinct character areas is incorrect. The NDP must be much clearer and more accurate about the status, meaning and derivation of the areas depicted on Map 4.</p> <p>The Respondent’s land areas are not correctly represented by their generic descriptions “Southern Farmlands” and “Chalk Hill Farmlands” and need to be subdivided or indexed to correctly reflect the existing land uses.</p> <p>Policy WTN 3 - This policy should also refer to the County level landscape character areas because of the significant</p>	<p>Reference to the precedence of Plans is not considered necessary.</p> <p>This is not considered necessary.</p> <p>The Plan does not preclude the conversion of buildings or diversification outside the Housing Settlement Boundary.</p> <p>The Neighbourhood Plan has to be prepared to in in conformity with the strategic policies of the Local Plan. The adopted and emerging Local Plans do not make provision for strategic development within the neighbourhood area.</p> <p>It is acknowledged that Map 4 does not reflect the areas identified in the final Worlington Landscape Appraisal. A suggested revised Map 4 is included at the end of this response which the Examiner might recommend is included in the Referendum Plan.</p> <p>The level of detail put forward in the representation is not appropriate for a landscape appraisal of this nature.</p> <p>This is not considered necessary given that the Neighbourhood Plan</p>

Summary Comment	Parish Council response
<p>difference between this approach and that of the Worlington Landscape Character and Sensitivity Assessment.</p> <p>Chapter 9 - It needs to recognise also the need to maintain existing and additional large scale renewable energy schemes to support and accelerate this transition in appropriate locations.</p> <p>Chapter 11 Transport and Travel - the A11 and Red Lodge all direction junction situated at the South end of the neighbourhood plan area should be recognised as a primary access corridor with connectivity to and from Norwich to Cambridge and multi direction junction providing the primary access to the plan area and focal point for development where there is a focus on the A11 and accessibility to and from this A11 junction.</p>	<p>Landscape Appraisal provides a more detailed assessment of landscape character for Worlington.</p> <p>This is not considered necessary given paragraph 9.11 addresses sustainable energy within the Housing Settlement Boundary and large scale renewable energy schemes are likely to be of a strategic nature that are more appropriate for the strategic policies of the Local Plan.</p> <p>The suggestion that the junction could be a “focal point for development where there is a focus on the A11 and accessibility to and from this A11 junction.” would be contrary to the strategic policies of the current and emerging Local Plan and thus not appropriate to include in the Worlington Neighbourhood Plan.</p>

Suffolk County Council	
<p>Health and Wellbeing – SCC respectfully disagrees with the Parish Council’s response to our suggested addition of a reference to Health and Wellbeing in policy WTN 7. Insert the text: “that is complimentary and supportive to the health and wellbeing of the people who live, work and visit the village.” at the end of the introductory paragraph of WTN 7.</p>	<p>While the Parish Council supports measures that will improve health and wellbeing, there is no guidance provided by the County Council as to what would be determined as “complimentary and supportive to the health and wellbeing”. It is noted that the Draft West Suffolk Local Plan contains strategic Policy SP2 – Health and wellbeing, - which states:</p> <p>“West Suffolk Council will work with key stakeholders, delivery partners and promoters to help tackle and reduce health inequalities, enable healthy lifestyles and foster healthy, safe and cohesive communities. This will be achieved through supporting well designed development that delivers good access to existing and planned facilities and community infrastructure, including cultural and leisure facilities, play spaces,</p>

Summary Comment	Parish Council response
<p>Public Rights of Way - We would continue to recommend the addition of the following sentence: “Development which would adversely affect the character or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use.” which addresses a different issue.</p> <p>Transport – Local Green Spaces</p>	<p>allotments and green spaces, to improve residents' physical and mental wellbeing and help people stay well and live in a safe environment.”</p> <p>The inclusion of such a policy in the Local Plan might sufficiently cover this matter without the need to repeat it in the Neighbourhood Plan.</p> <p>This suggested wording is contained in Policy LP58 of the Draft Local Plan and it is not necessary to repeat it in the Neighbourhood Plan.</p> <p>The issues relating to Local Green Space are addressed above.</p>

Other responses	
M Howard	Nothing further to add
Sport England	Nothing further to add
J Shead	It is not possible to require all developments to include active travel schemes. The suggestions put forward are reliant on organisations other than then Parish Council to deliver and therefore timescales cannot be placed in Community Action 6.
D MacBean	The cost of producing the Plan is not a matter for the examination.
Historic England	Nothing further to add
National Gas Transmission	Nothing further to add
National Highways	We believe that the representation has used ‘cut and paste’ from a previous comment as it refers to BMSJLP and land supply, neither of

Summary Comment	Parish Council response
	which is referenced in the Neighbourhood Plan.
Cycling UK	Nothing further to add
Natural England	Nothing further to add
R Murray Brown	The proposal for one private dwelling on 0.9h of land on the Newmarket and Links Rd would be contrary to planning policies.
Defence Infrastructure Organisation	Nothing further to add
D Field	Nothing further to add

Suggested amended Map 4

