

Date: 19<sup>th</sup> May 2017  
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Hartest Neighbourhood Plan  
Working Group

Dear Mr Price,

### **Pre-submission consultation of the Hartest Neighbourhood Plan**

Thank you for consulting Suffolk County Council (SCC) on the pre-submission version of your neighbourhood plan.

The county council is not a plan making authority, except for minerals and waste. However, it is a fundamental part of the planning system being responsible for matters including:

- Archaeology
- Education
- Fire and Rescue
- Flooding
- Health and Wellbeing
- Libraries
- Minerals and Waste
- Natural Environment
- Rights of Way
- Transport

This response, as with all those comments which the county council makes on emerging planning policies and allocations, will focus on matters relating to those services.

Suffolk County Council is supportive of the Hartest Neighbourhood Plan vision for the Parish. Whilst a number of concerns with the plan itself are outlined below, the county council is willing to assist Hartest Parish Council in further developing its plan where matters relate to county council service responsibilities and policy objectives.

The advice is given in this responds to the Neighbourhood Plan is without prejudice to any advice provided following any formal planning application consultation on sites identified in this plan.

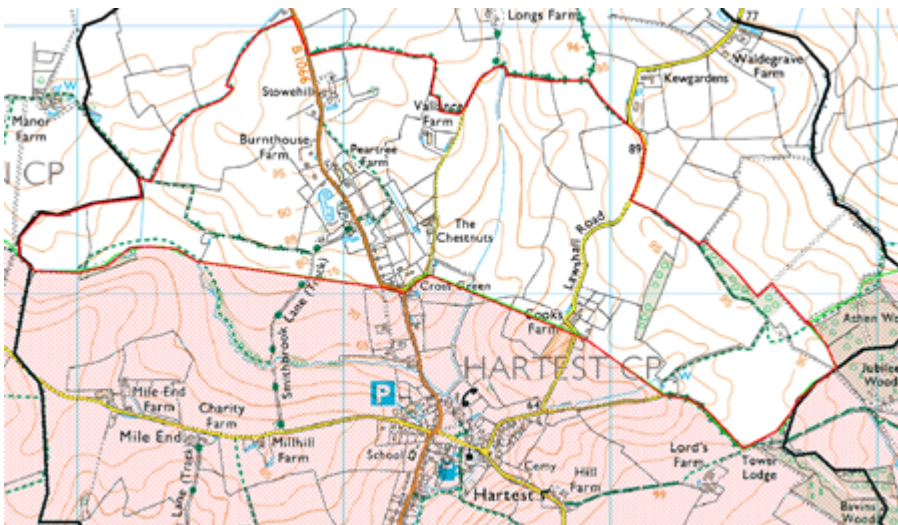
## Natural Environment

Whilst the county council does not have a specific overarching responsibility in respect of ecology, it has a general statutory duty to biodiversity and the natural environment. For that reason, the county provides comments on ecology and landscape.

National policy on the natural environment is set out in the National Planning Policy Framework and other documents such as the 2011 Government White Paper on natural environment.<sup>1</sup> The general principle is that, in addition to statutory requirements on designations and assessments, the planning system should seek to conserve and enhance habitats and biodiversity. Suffolk County Council welcomes the plan's focus on the protection and enhancement of natural environment recognising their value to the local community.

The county council is content with chapter 8 'Natural Environment' which discusses local environmental distinctiveness in a positively and robust way.

The approach taken to extend the existing Special Landscape Area is also reasonable and justifiable given the nature of the area in question, rolling landform which contributes to the character and setting of a dispersed settlement in this part of the parish. However, the revised boundary is probably too widely drawn to be robustly defensible as it covers too much of the plateau between the headwaters of the Glem and the Chad Brook. Therefore, the county council would advise that the boundary should be revised that it reflects defined features on the ground. Below the Suffolk County Council suggests an alternative approach, but it must stress that this is without benefit of a site visit and is just a place to start.



In addition, Suffolk County Council would propose to ensure that Policy HAR 9 - Special Landscape Area clearly identifies the new designation as referred to under paragraph 8.11. Especially as the proposals map only shows the Special Landscape Area as green hatching and without the reference to the designation boundary.

Policy HAR 10 - Development Proposal in the Special Landscape Area is reasonable worded and not overly restrictive.

### *Assessment requirements*

<sup>1</sup> The Natural Environment White Paper (NEWP) The Natural Choice: securing the value of the nature (2011)

In some circumstances a Neighbourhood Plan could have significant environmental effects and may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require strategic environmental assessment. One of the basic conditions that will be tested by the independent examiner is whether the making of the Plan is compatible with European Union Obligations. Whether a Neighbourhood Plan requires a strategic environmental assessment, and the level of detail needed will depend on what is proposed in the draft Neighbourhood Plan.

In order to be compliant with international and national regulations, a plan level screening exercise will need to be carried out. The local planning authority will be able to advise the parish council if the emerging neighbourhood plan will need to be subject to assessment.

### Education

The county council has a legal duty to ensure provision of education from ages 2 to 16. The National Planning Policy Framework (paras. 38, 72, 203-204) establishes a role for the planning system in ensuring that provision can be met, in resolving issues before planning applications come forward. Furthermore, it seeks to minimise the need for travel, especially by private car. Safe routes to school are necessary; otherwise the education authority must bear the cost of school transport.

The County and District Councils would use their shared approach for ensuring that development makes provision for early years, primary, secondary and sixth form education, which is set out in the adopted 'Section 106 Developer's Guide to Infrastructure Contributions in Suffolk'.<sup>2</sup> It is expected that development funds new places, if needed, through Section 106 agreements or (where/when in place) the community infrastructure levy.

When a site allocation or planning application comes forward for consultation, the county council considers;

- Whether local schools can cope with the additional pupils arising from the development. If there is sufficient spare capacity, no action needs to be taken.
- If local schools do not have sufficient spare capacity, whether it is possible for those schools to be expanded by means of developer contributions (of land and funding for construction).
- If it is not possible for development to enable necessary education expansion, the may recommend that development does not take place.

The Hartest Neighbourhood plan does not allocate land for development.

Paragraph 11.4 of the Hartest Neighbourhood Plan refers to the local Hartest CEVC Primary School and a forecast of the school roll since September 2015. Please find below the current number of pupils on roll and a forecast up to 2020/2021.

	PAN	Capacity	95%	16/17	17/18	18/19	19/20	20/21
Hartest CEVC Primary School	15	105	100	70	72	71	69	66

### Minerals and Waste Plans

<sup>2</sup> See: <http://www.suffolk.gov.uk/business/planning-and-design-advice/planning-obligations/>

Suffolk County Council is the planning authority with responsibility for mineral extraction and waste disposal. Local policy on minerals and waste planning is set out in the Suffolk Waste Core Strategy and Policies (2011)<sup>3</sup> and Suffolk Minerals Core Strategy (2008) and Suffolk Minerals Site Allocations (2009)<sup>4</sup>.

It is not envisaged that neighbourhood plans will consider these issues directly. However, the County's Minerals and Waste Plans are part of the Development Plan with which neighbourhood plans must be in general conformity.

National policy requires the county council to recognise that minerals are finite natural resource, and to protect resources from development which would compromise our ability to extract them at a later date. The northern part of Hartest is located inside the 'minerals consultation area', which defines areas likely to contain viable resources.

When development comes forward in these areas, the county council has the ability to require investigation of the mineral resources on these sites, before planning permission is granted. This gives the County Council the ability to prevent new development from being an obstacle to the extraction of minerals or to require that limited mineral extraction is carried out before the new development is constructed.

This does not mean that extraction is automatically required in these areas. Rather, Suffolk County Council will need to consider whether extraction is desirable.

### Public Rights of Way

As per paragraph 75 of the National Planning Policy Framework, the planning system should seek to protect and enhance public rights of way, for the purposes of encouraging healthy and sustainable travel. Whilst there is no requirement on neighbourhood plans to consider any specific matters (beyond meeting the basic conditions), Suffolk County Council welcomes Community Action 9 to support the maintenance and improvements of the local public right of way network.

Developing countryside access would help ensure the plan adequately covers sustainable travel options and quality of life objectives regarding the health and the wellbeing of communities.

If the Parish Council wishes to pursue these potential opportunities, the county council would be pleased to work in partnership.

### Social Care, Health and Wellbeing

The National Planning Policy Framework requires the planning system to support the implementation of local strategies to improve health and wellbeing. In 2016 The Suffolk Health and Wellbeing Strategy (adopted 2013) was refreshed, but continues to include four main visions:<sup>5</sup>

- Every child in Suffolk has the best start in life
- Improving independent life for people with physical and learning disabilities
- Older people in Suffolk have a good quality of life

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<sup>3</sup> See <https://www.suffolk.gov.uk/planning-and-environment/planning-applications/minerals-and-waste-policy/waste-core-strategy/> for more information

<sup>4</sup> See <https://www.suffolk.gov.uk/planning-and-environment/planning-applications/minerals-and-waste-policy/minerals-core-strategy/> for more information

<sup>5</sup> See <https://www.suffolk.gov.uk/council-and-democracy/the-council-and-its-committees/committees/suffolk-health-and-wellbeing-board/> for more information

- People in Suffolk have the opportunity to improve their mental health and wellbeing

The objectives of the Suffolk Health and Wellbeing Strategy are amongst others covered by the consideration which this Plan gives in the protection and maintenance of local green space (policy HAR13 and Objective 4 - Preserve existing and promote an increase in green spaces and provide better access to them)

The contribution which planning and the built environment can make to improving mental health and wellbeing is less obvious and direct, though some principles (feelings of safety, opportunities to exercise, opportunities for social interaction) can be exemplified in this plan through the consideration given to open space which offers opportunities for exercise such as walking, community services and facilities in the village centre and highway safety.

Finally, this plan seeks to make a contribution to the Health and Wellbeing Strategy's objective on older people. The contribution which planning can make to wider responses to the ageing of the population is promoted in the Planning Practice Guidance and is also set out in a Government paper called 'Lifetime Neighbourhoods'.<sup>6</sup> Local accessible service provision is a key component of a lifetime neighbourhood, so the Parish Council's efforts in relation to the retention and provision of community facilities (policy HAR 17) can be seen to support this objective.

In addition, provision of community facilities can also help reinforce community networks which can support and reduce the social isolation of people with physical and learning disabilities.

Based on the evidence, consistency with national policy (chapter 8 of the National Planning Policy Framework) and consistency with local health and wellbeing objectives, the county council supports the provisions of this Plan.

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I hope that these comments are helpful. Please contact me via the details at the top of this letter if you would like to discuss any of the matters raised or if any county council service areas can be of assistance in the further development of your Plan.

Yours sincerely,

Barbara Adamski  
Planning Officer (Policy)  
Resource Management

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<sup>6</sup> See [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6248/2044122.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6248/2044122.pdf) for more information