

Oulton Neighbourhood Plan 2021-2036



Table of Contents

INTRODUCTION	1
NEIGHBOURHOOD PLANNING	3
OVERVIEW OF NEIGHBOURHOOD PLANNING	3
PROCESS OF DEVELOPING THIS NEIGHBOURHOOD PLAN	4
CONSULTATION WITH RESIDENTS	5
VISION AND OBJECTIVES.....	7
VISION.....	7
OBJECTIVES	7
HOUSING AND DESIGN	9
HOUSING TYPE AND MIX.....	10
AFFORDABLE HOUSING.....	12
DESIGN.....	14
NATURAL ENVIRONMENT	20
BIODIVERSITY AND GREEN CORRIDORS	22
LOCAL GREEN SPACE	25
IMPORTANT VIEWS	28
THE PADDOCKS SPECIAL CHARACTER AREA	31
BUILT AND HISTORIC ENVIRONMENT	34
ACCESS AND TRANSPORT	39
ACCESS TO SERVICES AND SUSTAINABLE TRANSPORT.....	39
TRAFFIC AND TRAFFIC SPEED	42
APPENDIX A – POLICIES MAP	44
APPENDIX B – DESIGN CHECKLIST	45
APPENDIX C: JUSTIFICATION FOR LOCAL GREEN SPACE POLICY WORDING	52



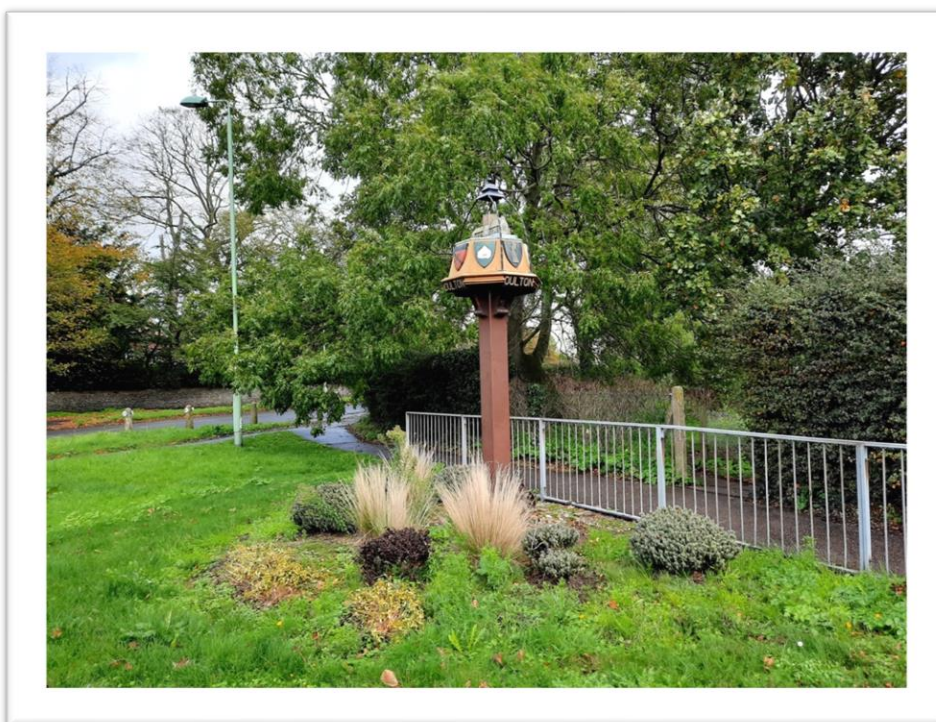
Introduction

1. This is the Neighbourhood Plan for Oulton. A Neighbourhood Plan, once completed and 'made' by the district council and Broads Authority, is used to help make decisions on planning applications in the parish. It has been developed by a working group of local people and parish councillors, set up under the auspices of the parish council, and with the involvement of the wider community. As well as having planning policies that will be used to assess planning applications, it also has Community Actions. These aren't used to make planning decisions, but they can be used by the parish council and the community of Oulton to focus our efforts in the future to ensure that Oulton remains a wonderful place to live.
2. Oulton Parish and village, which neighbours Oulton Broad and its separate parish, is around two miles northwest of the town of Lowestoft. It is one of the larger villages in East Suffolk, with a resident population of over 4,000. Together with Lowestoft, Carlton Colville, Corton, and Oulton Broad it is the largest built-up area in the District with a combined population of nearly 70,000 people. Indeed, the adopted East Suffolk Waveney Local Plan treats Oulton as part of the built-up area of Lowestoft and part of the parish effectively forms the settlement edge of Lowestoft.
3. In the main the parish falls within East Suffolk district (formerly Waveney), whilst the marshes to the west are within the Broads Authority Executive Area.
4. There are a number of county wildlife sites within the parish, including Oulton Marshes which is a Suffolk Wildlife Trust nature reserve. Sprat's Water and Marshes, Carlton Colville lies adjacent the area and is designated for its biodiversity importance internationally. There is good access into nature and the countryside from the built-up area of Oulton, by public rights of way.
5. There is good access to a range of facilities at Oulton Broad, as well as in Lowestoft, although there are local facilities such as schools, the community centre and the Blue Boar within the parish. The church of St Michael, which is grade I listed, falls somewhat outside of the village centre.
6. The 'heart' of the village is the Community Centre on Meadow Road. Here there are a large number of events and activities, including yoga, brownies, children's ballet, carpet bowls, art, keep fit, and line dancing. There are usually well over 200 bookings for different activities each month, so it is very well used by a variety of groups. This is an indication of a thriving and very engaged community.
7. The main thoroughfare through the village is the B1375, the Gorleston Road, which can get busy and, being adjacent to a large number of houses, can dominate. At 4.5km in length, it connects the A146/ A1117 to the south with the A12 to the north. According to a technical report for the Lake Lothing Third Crossing¹, traffic flows are

¹ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010023/TR010023-000362-7.2%20-%20Transport%20Assessment%20-%20App%20D%20-%20Traffic%20Data%20Collection.pdf>

quite high. The two-way flow in the AM peak hour was 1,068, whilst the two-way flow in the PM peak hour was 1,245. This is around a vehicle every three seconds passing a given point. Although there are footways on both sides, these are very narrow in places, notably Oulton Street just south of the junction with Union Lane where traffic speeds. Even at this natural choke point, 85th percentile traffic speeds are around 10mph above the 20mph speed limit, and an average speed of 27mph².

8. Much of the parish is still mainly agricultural and open countryside, although on-going and substantial planned housing growth is impacting on that. There are some large allocations in the East Suffolk Waveney Local Plan, some being built out now, which will deliver substantial new housing, including affordable housing. No doubt because of the closeness to Lowestoft, Oulton is accommodating a considerable amount of housing growth, and so is changing. A Neighbourhood Plan cannot stop such growth, but it can influence it. This Neighbourhood Plan aims to build on the strengths of the parish and its community, notably its rural character and strong, valued sense of community. It will enhance the natural environment for wildlife and people, protect key historic assets and the tranquillity, help to tackle climate change, and facilitate opportunities for people to meet and get together. Importantly, if there is any further housing development, the plan aims to ensure it is the right type with the right design. The Neighbourhood Plan is therefore a wonderful opportunity for local people to influence how Oulton changes and grows.



The Oulton Village Sign, erected in 1990

² SAM device traffic and speed data from 27th April 2021 to 25th May 2021

Neighbourhood Planning

Overview of Neighbourhood Planning

9. Neighbourhood planning was introduced by the Localism Act 2011. Neighbourhood Planning legislation came into effect in April 2012 and gives communities the power to agree a Neighbourhood Development Plan. It is an important and powerful tool that gives communities such as parish councils statutory powers to develop a shared vision and shape how their community develops and changes over time.
10. Oulton is in East Suffolk district and so the Neighbourhood Plan sits within the context of the East Suffolk Waveney Local Plan, adopted in 2019. Part of the parish is also within the Broads Executive Area, and so it is covered by the Broads Authority and its own recently adopted local plan.
11. The Neighbourhood Plan will be a document that sets out planning policies for the Parish and these will be used, alongside those two local plans, to decide whether planning applications are approved or not. It's a community document, that's written by local people who know and love the area.
12. The Neighbourhood plan has to support the delivery of the 'strategic policies' contained in the East Suffolk Waveney Local Plan and that for the Broads Authority, and so it cannot promote less development than set out in local plans. That is, the local plans set the overall strategic policies such as the amount of new development and the distribution of that development across the district and the general protection of the environment.
13. The East Suffolk Waveney Local Plan has allocated land for the planned housing growth in the parish. The total planned growth in the adopted East Suffolk Waveney Local Plan between 2014 to 2036 in the Lowestoft urban area (including Oulton) is 5,206. This growth requires the physical expansion of the urban area of Lowestoft. This includes into Oulton parish and two allocations are expected to deliver 340 dwellings (Land between Hall Lane and Union Lane, and land north of Union Lane). Both of these allocations are scheduled for delivery early in the plan, between 2020 – 2025. The "Woods Meadow" development is a mixed-use allocation from a previous Waveney Local Plan comprising approximately 800 dwellings and supporting facilities including primary school, medical centre, shops and country park. The Broads Local Plan has no proposals for housing within the parish.
14. The Neighbourhood Plan can include 'non-strategic policies', such as the mix of housing, design principles for new development, conserving and enhancing the natural and historic environment, protecting local green spaces from development, and setting out other development management policies. Importantly, the Neighbourhood Plan will contribute to the achievement of sustainable development.
15. Once a Neighbourhood Plan has been 'made', following consultation with residents, examination and a local referendum, it becomes part of the statutory development

plan for the parish and will be used by the district council and Broads Authority in deciding on all planning applications in the parish.

Process of Developing this Neighbourhood Plan

16. The parish area shown in **Figure 1** was designated as a Neighbourhood Plan Area in December 2018. Working on behalf of the community, the Oulton Neighbourhood Plan Working Group has prepared this draft plan that will shape and influence any future development and change across the parish.
17. A broad range of evidence has been reviewed to determine issues and develop policies for the plan. This includes evidence from the Census 2011, housing data, review of environmental designations, Index of Multiple Deprivation, and historical records. Further assessment to gather new evidence has also been undertaken, including an assessment of key views, all supported by consultation activities with the community.
18. Any new development should serve both current and future residents. The policies contained within this plan will enable us to influence the design and type of any new homes being delivered in the parish, as well as ensuring infrastructure improvements are delivered alongside growth so as to maximise community benefit.

Figure 1: Designated Neighbourhood Area

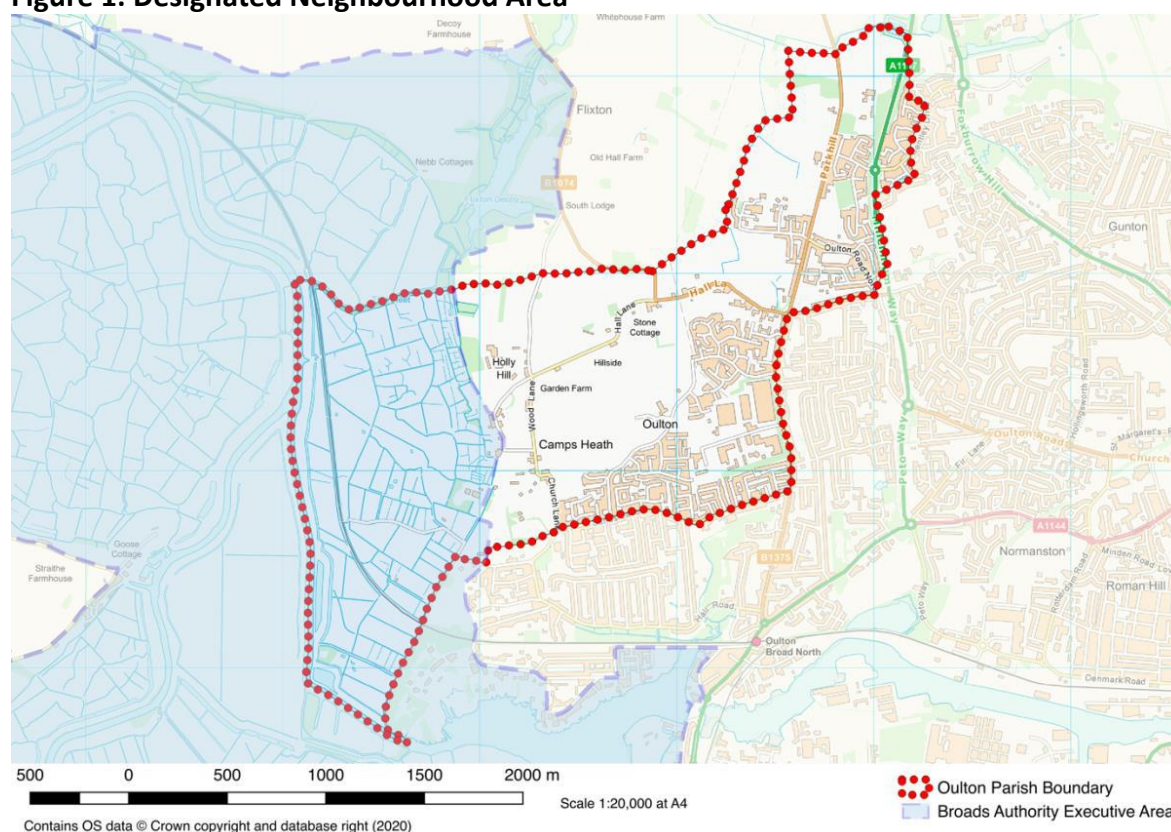
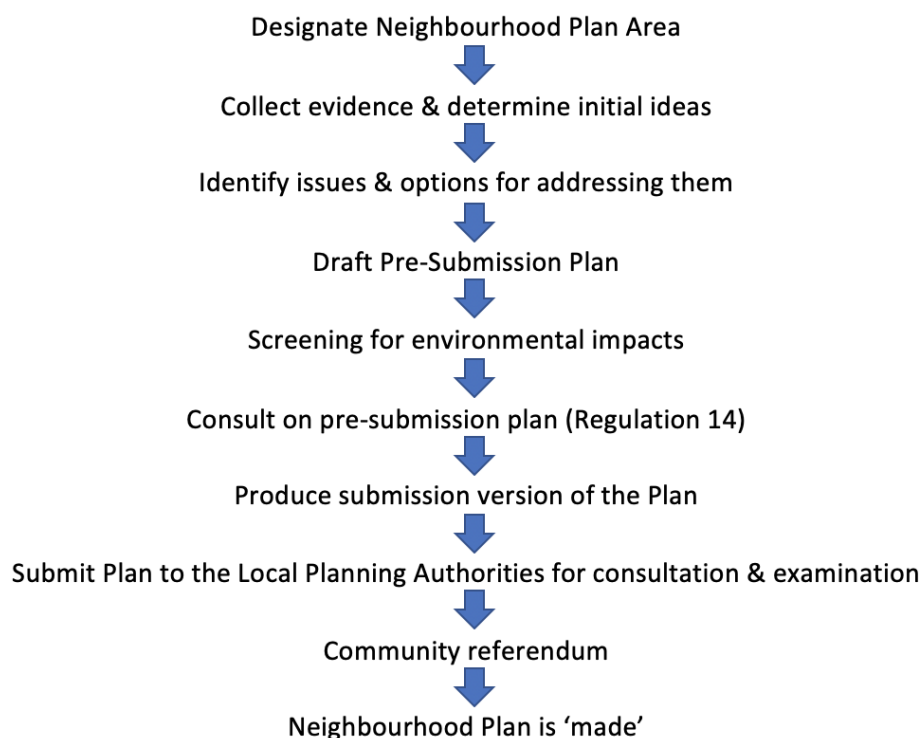


Figure 2: Neighbourhood Plan Process



Consultation with Residents

19. The Oulton Neighbourhood Plan has been developed by residents and parish councillors on behalf of the wider community. A working group, comprising a mix of residents and parish councillors, has overseen the process throughout on behalf of the Parish Council as the 'qualifying body'. Engaging the wider community in the Neighbourhood Plan's development has been a key focus for the working group.
20. A major consultation exercise ran for eight weeks from 12/12/20 to 8/2/21 and included a survey with 19 questions. There was a separate business questionnaire which accompanied the survey for business owners in Oulton. A flyer was delivered to every resident and business in the parish, and it was advertised on the website, via posters and on social media. The survey was available online and in hardcopy from the working group. This enabled residents to provide their views on a wide range of issues and comment on policy options. The early engagement helped the working group to formulate this Regulation 14 pre-submission draft.
21. The main issues and matters raised included:
 - Traffic is a concern, particularly the speed of traffic.
 - There is strong support for protecting and improving wildlife habitat. Many local green space suggestions were made alongside key views.
 - Design is considered important and there is a good level of support for incorporating high environmental standards into new buildings.

- Providing housing for families, starter homes and lifetime homes is considered most important.
 - Residents feel that small – medium sized homes of 2 or 3 bedrooms are most in need.
 - There is strong support for improving walking and cycling links, especially to improve access to local services, and improve associated infrastructure such as benches and cycle racks.
22. More detail on consultation activities is provided in the Consultation Statement which accompanies this Neighbourhood Plan.



View of Oulton Dyke

Vision and Objectives

Vision

The special identity of Oulton, nestled as it is alongside the Norfolk and Suffolk Broads but on the edge of Lowestoft, will be protected and enhanced. The rural character is defined by many features, but especially habitats and green infrastructure for wildlife such as the marshes and broads, the openness of the landscape, historic buildings, and the tranquillity of the parish. Oulton's setting is important to the people who live there.

In protecting and enhancing this character, the plan will result in a more coherent, connected and expansive ecological network of key habitats that delivers a significant net ecological gain for wildlife over the plan period. The plan will ensure that the openness of the landscape is retained for the enjoyment of residents and visitors alike, adding as it does to the tranquillity and peace that residents so enjoy, and that the parish's historic and heritage assets continue to provide a sense of place.

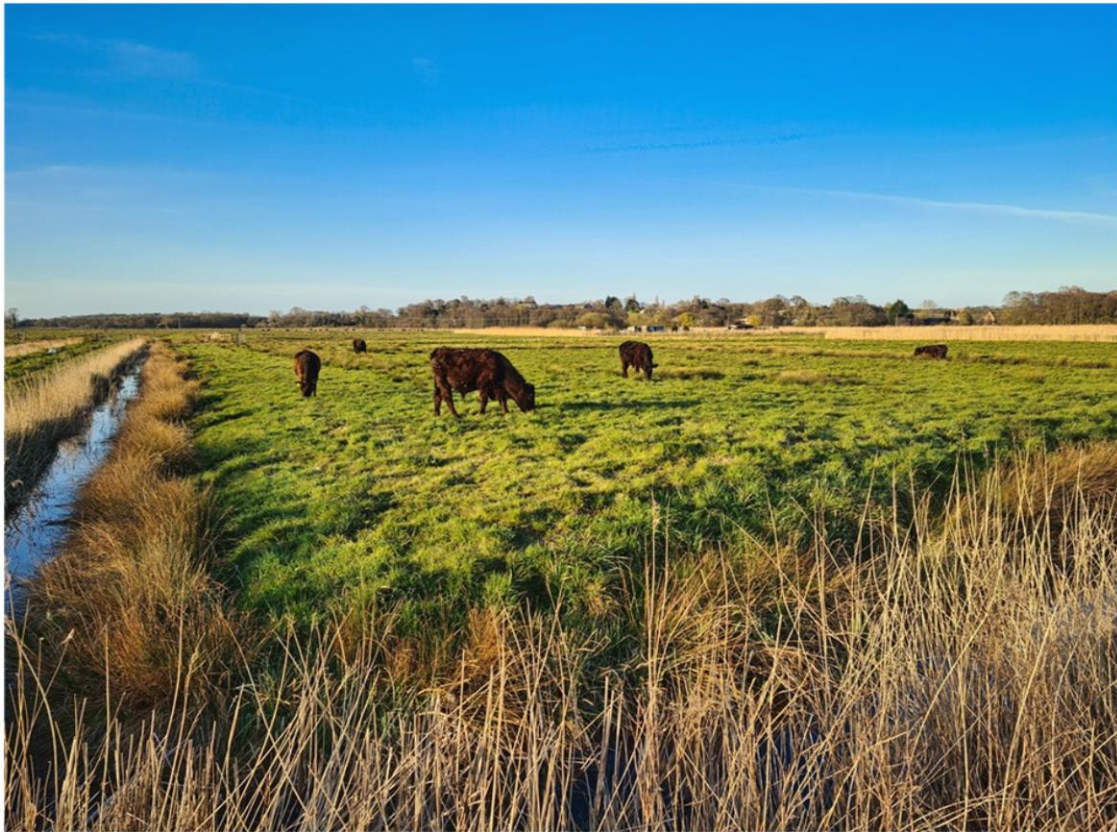
Where possible, the plan will help to address the negative impact that traffic flows and speeds have and improve access to local services and facilities by walking and cycling. Underpinning life in Oulton is the community spirit, and the plan will build on this, helping people to stay in the parish, and creating opportunities for people to meet, interact, and get to know each other.

Finally, the plan will make a key contribution towards addressing climate change, both through reducing greenhouse gas emissions and overseeing a radical change in the development of a network of trees and hedgerows to absorb CO₂.

Objectives

- A. Ensure the natural environment is a key consideration in all decisions about how Oulton changes;
- B. Conserve and enhance Oulton's ecological network;
- C. Ensure any future housing development meets the needs of residents of the parish;
- D. Ensure future development blends well with the existing built environment;
- E. Promote sensitive development that protects and enriches the landscape of the parish, safeguarding key views;
- F. Respond to climate change, promoting sustainable development and energy efficiency;
- G. The integrity, character and appearance of the historic environment of the parish will be conserved and where possible enhanced;
- H. Protect important green spaces;
- I. Promote access to the countryside for recreation and enjoyment;
- J. Reduce the impact of traffic; and
- K. Support community spirit by improving connections to local services and facilities, especially by making walking and cycling safer.

23. Although the neighbourhood plan does not have a specific policy on climate change, it has been woven into many of the policies. For example:
- Policy 3 supports new homes that are designed to high standards of energy efficiency. This will reduce energy consumption which should reduce CO² emissions;
 - Policies 3, 4, 5 and 6 promote the protection of the natural environmental and natural features such as trees, as well as the planting of new trees, hedges and habitats. Increased vegetation should not only have a cooling effect on air temperature, but will absorb CO² emissions; and
 - Policy 9 encourages the use of sustainable transport such as walking. This should reduce some car journeys which in turn will reduce CO² emissions. Community Action 1 encourages electric vehicle use.



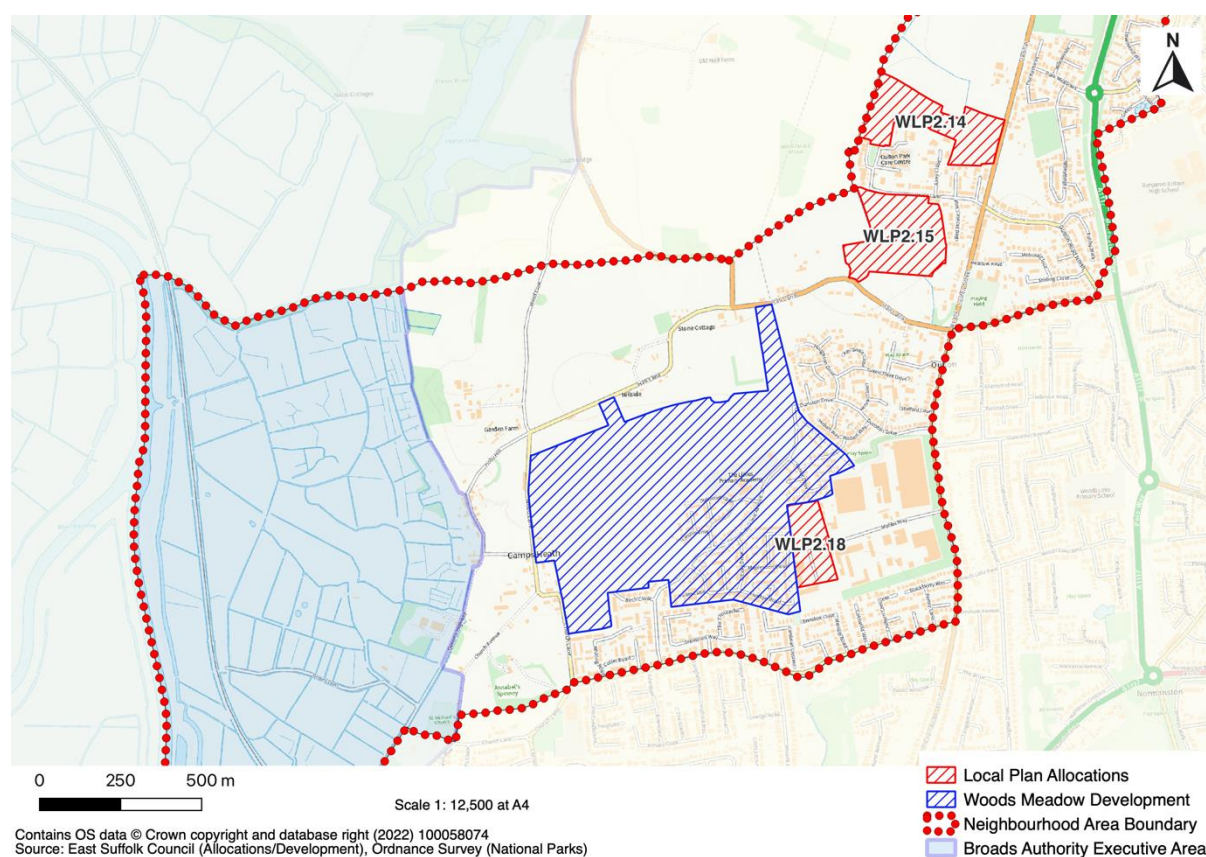
View of Gravel Dam, towards Camps Heath, Oulton

This section on Housing and Design and the policies it contains aims to deliver the following neighbourhood plan objectives for Oulton:

- *Objective A: Ensure the natural environment is a key consideration in all decisions about how Oulton changes;*
- *Objective C: Ensure any future housing development meets the needs of residents of the parish;*
- *Objective D: Ensure future development blends well with the existing built environment;*
- *Objective F: Respond to climate change, promoting sustainable development and energy efficiency.*

- Oulton Neighbourhood Plan 2021-36 9

Figure 3: Local Plan Allocations and Woods Meadow Development



Housing Type and Mix

27. The National Planning Policy Framework requires plans to have policies that meet the housing needs of different demographic groups, such as older people, disabled people, self-builders, families etc.
28. Consultations found that it is important that new housing meets a local need in terms of the type and mix of houses provided, not least so that local people are able to stay in the parish rather than having to move away, and this is seen as important in retaining the special community spirit of the parish.
29. The population grew slightly between 2001 and 2011, with this almost entirely in the older age categories. It might also indicate a need for homes suitable for people as they age. Consultations with the community seem to recognise this, with more bungalows being popular. It is also recognised by the East Suffolk Waveney Local Plan (Policy WLP8.31 – Lifetime Design) which requires 40% of new dwellings to be designed to be adaptable to people’s needs as they age. The Local Plan for the Broads requires 20% of dwellings to be built to meet Building Regulation Standard M4(2) on developments of 5 or more dwellings. This requires the dwelling to meet the needs of occupants with differing needs, including some older or disabled people, and allow adaptation of the dwelling to meet the changing needs of occupants over time. **Policy 1** seeks to align with this and provide support in particular for bungalows.

30. The ageing population may also indicate a need for more smaller unit housing within the parish, to cater for people wanting to downsize in the future. Just over a quarter of homes are single occupancy with around two thirds of these being older people. It could be that younger people are leaving the community because they cannot afford the housing to stay, which would suggest a need for housing suitable for younger people, which could be affordable housing or rental or smaller dwellings.
31. Looking at the type of housing available, it is dominated by detached homes which make up just over half of houses in the parish. In terms of dwelling size, although there is a fairly average number of 1-bedroom homes, the proportion of 2-bedroom is below average, whilst the proportion of 3 and 4 bedroomed homes is quite high. This means there may be a shortage of smaller properties for older people to downsize into or people just starting out on the housing ladder to buy.
32. When asked about preferences for new homes the community indicated a slight preference towards a mix of housing, especially two but also three bedroomed homes, and to a lesser extent four bedroomed. Especially keen to have housing for families or people trying to get on the housing ladder.
33. Oulton is popular with families, and this means it has quite a high percentage of younger people 15 years of age or less, who will eventually need to move onto having their own homes. Between 2001 and 2011 there was a significant increase in non-dependent children living at home, indicating that they cannot afford to move.
34. The Housing Needs Assessment found that three bedroomed homes are the most common and they will remain the greatest need going forward (see **Figure 4**). However, the data from the Housing Needs Assessment shows that there is an increasing need for 2 bedroomed homes compared to 2011: the proportion increasing from 22% up to 28%. This ties in with the finding that Oulton has a lower proportion of 2 bedroomed homes compared to Waveney and England, which is 28%. This suggests that a policy intervention is needed to boost the proportion of 2 bedroomed homes towards 28% as the need isn't being met without a policy steer.

Figure 4: Proportion of homes of different sizes (%)

Number of Bedrooms	Actual (2011 Census)	Forecast (To 2036)
1 bed	9.9	9.2
2 bed	22.3	28.5
3 bed	49.4	45.8
4 bed	16.0	13.0
5 bed	2.3	3.5

Source: AECOM, Housing Needs Assessment 2021

35. East Suffolk Waveney Local Plan Policy WLP8.1 says that the mix of sizes and types of units on any particular site should be based on evidence of local needs. It also says that 35% of new dwellings are expected to be 1- or 2-bedroom properties but that Neighbourhood Plans can set out a more detailed approach to housing type and mix which reflects local circumstances and is supported by evidence, and a slightly modified approach seems to be required for Oulton. Examples are shown in **Figure 5**.

Figure 5: Requirement for Small Homes

Size of Development	Minimum requirement for small homes (2 bedrooms)
10 dwellings	3
11-13 dwellings	4
14-16 dwellings	5

36. Although a mix of housing as set out in **Policy 1** will be expected, it is recognised that with building conversions it might not always be possible.
37. **Policy 1** intends to ensure appropriate levels of smaller dwellings are delivered where landowners/developers own large sites within the parish but choose to divide these up in such a way that the threshold is are not met.

Policy 1: Housing Type and Mix

All housing proposals will need to provide a mix of housing types and sizes, and these should aim to reflect local housing need using the best available and proportionate evidence.

All housing proposals for 10 or more dwellings must include a minimum of 30% of dwellings comprising two bedrooms, rounded up to the nearest whole figure unless evidence is provided showing that:

- a) A lower need is justified through a more recent Housing Needs Assessment for Oulton; or
- b) The scheme is made unviable.

These requirements apply to the whole proposal, with the expectation that an even distribution is made across market and Affordable housing.

The provision of single-storey dwellings will be considered a significant benefit, and/or dwellings that are built to adaptable and accessible M4(2) standards, in order to meet the needs of an ageing population.

Affordable housing

38. Looking at affordability, the proportion of rented accommodation is slightly lower than average, but there is a good level of social-rented properties within the parish, which may be more affordable to those with low incomes.
39. The Housing Needs Assessment identified an affordability gap, looking at household income and house prices. This indicates a need for affordable housing. The sites allocated for residential development, plus Woods Meadows, should deliver a significant amount of affordable housing in Oulton. Policy WLP8.2 requires 20% of new homes for major planning applications to be affordable housing. If this is applied in

Oulton, it more than satisfies the estimated local need set out in the Housing Needs Assessment. This suggests that the Neighbourhood Plan does not need a separate policy on providing more affordable homes.

40. Affordable housing is housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:
41. **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
42. **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
43. **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.
44. **First Homes:** The government has set a minimum discount of 30 per cent for First Homes, with this being locked-in for all future first time buyers. The government has also confirmed that 25 per cent of the affordable homes that each housing scheme, with certain exceptions, provide through section 106 development contributions will need to be First Homes.
45. Looking at the type of affordable housing, Policy WLP8.2 – Affordable Housing – in the East Suffolk Waveney Local Plan requires 50% as affordable rent, there is flexibility over the other 50%. East Suffolk Council is preparing an Affordable Housing Supplementary Planning Document which it is aiming to publish in 2022, which is also relevant to the Broads³. The Housing Needs Assessment for Oulton suggests a 50/50

³ <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/>

split between affordable rent and routes to home ownership is appropriate for the parish. However, the evidence also suggests a need to help people get on the housing ladder, especially younger residents. The Neighbourhood Plan will require an alternative mix suggested by the Housing Needs Assessment, as shown in Policy 2 below.

46. This aligns with the direction of proposed national policy, which includes a mandated minimum level of delivery of the Government's new First Homes affordable home ownership product.
47. The District Council or Broads Authority will ensure that any planning permission granted for affordable housing schemes is subject to appropriate conditions and/or planning obligations to secure its affordability in perpetuity (for the life of the property), whilst recognising the national Right to Buy scheme. Within the Broads Authority Executive Area, Policy DM34 of the Broads Local Plan requires development of 6-9 dwellings to contribute a commuted sum (off-site contribution) towards the provision of affordable housing.

Policy 2: Affordable housing tenure mix

Affordable housing provided should meet the following mix of tenure types as determined by the most recent Housing Needs Assessment for Oulton:

- a) 50% affordable rent
- b) 25% First Homes
- c) 15% shared ownership
- d) 10% rent to buy

Design

48. Design is another key area where the Neighbourhood Plan can have influence. The Government is raising the importance of good design with the development of national design guides, and encourages neighbourhood plans to have design policies. Design, however, is more than just what the actual building looks like.: It also relates to layout, density and how it incorporates habitat features and landscaping, amongst other considerations. The augmenting of ecological networks is a key feature of the plan, and all development will be expected to contribute to this.
49. In earlier consultations with the community, there was strong support for ensuring high quality design of new developments, alongside high environmental standards. Electric charging points was also popular. Design is considered important and there is a good level of support for incorporating high environmental standards into new buildings. Also support for contemporary design to achieve high environmental standards. Strong support from residents for inclusion of local design guides for new homes to help reflect local character.
50. East Suffolk Waveney Local Plan Policy WLP8.28 – Sustainable Construction – requires high environmental standards and sets out examples of how this can be achieved, but

without specifying what that standard could be. A Sustainable Construction supplementary planning document was adopted on 5 April 2022 to help guide the implementation of this policy⁴. It is also an opportunity for the Neighbourhood Plan, to be specific as to how to drive-up standards.

51. The East Suffolk Waveney Local Plan Policy WLP8.29: Design sets out general principles for good design, but also allows neighbourhood plans to set their own criteria. Policy DM43: Design in the Local Plan for the Broads expects high quality design that considers a range of factors, and DM14: Energy Demand and Performance promotes design that is energy efficient. East Suffolk Council has also adopted a Residential Development Brief for the allocated site at Land North of Union Lane, Oulton (Policy WLP2.14 of the Waveney Local Plan). This has the status of a supplementary planning document and so will need to be reflected in any design for that allocation.
52. **Policy 3** is supported by Oulton Neighbourhood Plan Design Guidelines and Codes (February 2021), produced by AECOM. This sets out the general design principles for Oulton as well as more specific design codes for particular character areas. When developing proposals, it is expected that they will be informed and influenced by the Design Guidelines and Codes, in addition to being compliant with **Policy 3** itself.



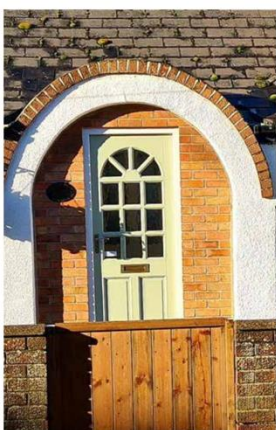
The local vernacular rendering is recommended to be pink and light cream



Brickwork



Timber boarding



Arched porch



Tile hung dormer



Combining materials - brick and cladding boarding



Brick quoins



Landscaping



Combining materials - sandstone brick and flint

The local vernacular, taken from the Oulton Design Guidelines & Codes, AECOM 2021

53. The National Planning Policy Framework requires a positive approach to be taken to promoting energy efficiency. In December 2021, the Government announced that

⁴ <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/supplementary-planning-documents/>

from June 2022, the Building Regulations will be changed so that CO₂ emissions from new build homes must be around 30% lower than current standards and emissions from other new buildings, including offices and shops, must be reduced by 27%⁵. It is not possible for neighbourhood plans to set additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings; instead, these must be contained in local plans. East Suffolk Council has adopted a Sustainable Construction Supplementary Planning Document, and this adds detail to part f of Policy 3. Investment in energy efficiency in new development will have the significant additional benefits of reducing energy costs for the users of new development, as well as carbon savings, and so will apply to apartments as well.

54. Electric vehicle charging points should be provided in line with national technical standards if available, or one per residential parking space as a minimum. This can be either on the plot for off-road parking, or at on-street charging points if the formal parking is provided on-street. In December 2021, the Government announced that new homes and buildings such as supermarkets and workplaces, as well as those undergoing major renovation, will be required to install electric vehicle charge points from 2022. When this is incorporated into Building Regulations, that aspect of **Policy 3** could be superseded. Residential parking must adhere to the standards set out in the Suffolk Guidance for Parking 2019, or any successor documents.
55. Design can be a very broad concept. There are a number of other policies in the neighbourhood plan that will influence design, such as the need to avoid undue harm to the Important views (**Policy 6**).
56. The design of new development is important throughout Oulton. However, the Oulton Design Guidelines and Codes does not cover the Broads Authority area, which means that **Policy 3** substantially applies to development within the East Suffolk area. Nonetheless, the principles of the policy and the checklist area also applicable to the Broads and can be used alongside guides provided by the Broads Authority.
57. **Appendix B** provides a checklist of design considerations which should be submitted alongside applications. The completed checklist will explain how each of the design requirements have been incorporated and inform the planning authority of the thinking behind the proposal. A proportionate approach can be taken to completing this. Applicants should also have due regard to national design guidance and codes and design policy in the local plans for East Suffolk Waveney and the Broads.
58. Criteria f of **Policy 3** relates to sustainability, including sustainable drainage. Development within the Internal Drainage District of the Waveney, Lower Yare and Lothingland Internal Drainage Board should seek any required consent prior to determination of any planning application.

⁵ https://www.gov.uk/government/news/new-homes-to-produce-nearly-a-third-less-carbon?utm_source=LPA+contacts&utm_campaign=ac322dac49-Architects+bulletin+30042019_COPY_01&utm_medium=email&utm_term=0_2d38e875a2-ac322dac49-8820022

Policy 3: Design

All new development within Oulton must demonstrate high-quality design and promote a good 'sense of place'. Any new development in the Broads area must be designed to the highest standard which is fitting with the areas equivalence of National Park status.

The design principles, taken from Oulton Neighbourhood Plan Design Guidelines and Codes (2021) should be followed and proposals must submit a completed version of the checklist in **Appendix B**. The Oulton Neighbourhood Plan Design Guidelines and Codes (2021) does not apply to development in the Broads Authority Executive Area.

a. Make the urban structure work for everyone

Proposals must be of an appropriate density, height, orientation, variety, scale and layout, with an appropriate use of boundaries to provide enclosure and define streets. Existing and new neighbourhoods should be linked rather than segregated.

b. Promote local character

Design which fails to have regard to local context and does not preserve, complement or enhance the character and quality of its immediate area and the wider parish will not be acceptable.

The use of materials that are prevalent in the parish, such as flint, brickwork, timber boarding, and render, will be supported, especially mixing materials on building facades. Buildings of innovative and contemporary design will also be welcomed, as long as their scale, materials and design complement the predominant building characteristics and enhance their surroundings. The tenure of homes should not be revealed through the external appearance including architecture, landscape, access, car parking, waste storage or other design features.

c. Provide or preserve a connected street layout

Streets should be considered as public space for people, and not just a way of enabling vehicles to move around. The needs of people walking or cycling, as well as children and wheelchair users, will be prioritised (see also **Policy 9 on Sustainable Transport**). A layout of well-connected streets helps achieve a sustainable, walkable and secure neighbourhood. Larger developments will need to avoid dominance of cul-de-sacs.

d. Treat vehicle parking as a place-making exercise

Vehicle parking should not dominate the street-scene, with the visual impact being minimised and spaces integrated with landscaping. A proportion of parking should be provided on-street within any new developments, but this should be well designed, located and integrated into the scheme to avoid obstruction to all highway users or impede visibility.

e. Improve landscape and access to the countryside

Open spaces will be an important part of the landscape and street scape (see also **Policy 5 on Local Green spaces**), should be accessible and within walking distance, and be connected to each other (see also **Policy 4 on Green Corridors**). New development should be well integrated into the landscape and, where relevant, maintain the quality of transition between the village and agricultural landscape as well as protect the landscape setting of the Broads (see **Policy 7**). Proposals will also need to fully incorporate landscaping and natural features such as trees, both those that are retained and those introduced, where the opportunity exists to help to deliver or complement the ecological network (see also **Policy 4**). The expectation is that new streets will be tree lined. Boundaries will be expected to have 'soft' treatments, comprising of hedges and/ or trees rather than hard boundaries such as close boarded fencing, unless this significantly conflicts with local character.

f. Design for sustainability

Designs that incorporate low carbon infrastructure (e.g., Ground source heat network or solar PV with battery storage) and high standards of design and construction, such as zero, or at least, CO₂ emissions standards that exceed the requirements of Building Regulations will be supported and considered a significant benefit. Homes built to an even higher energy efficiency standard will be considered as delivering a significant benefit. Electric car charging points will be expected to be provided as part of all new development, at least one per formal parking space.

Development that includes water management and sustainable drainage features contributing to flood risk management, water resource conservation and biodiversity should be a standard design requirement. Features would include rainwater harvesting/recycling and Sustainable Drainage Systems (SuDS) giving environmental, recreational and biodiversity benefits.

g. Character Areas

Proposals falling within one, or more, of the five character-areas set out in the Oulton Neighbourhood Plan Design Guidelines and Codes (2021), will be expected to have full regard to the relevant design codes for that area. The Design Guidelines and Codes do not apply in the Broads Authority Executive Area.



Figure 13: Blue Boar Inn located along Oulton Street.



Figure 15: The Village sign is situated close to the Somerleyton Road/ Gorleston Road roundabout, on the corner of the community field. It was erected in 1990 and designed by the Parish Council. The sign symbolises the varied history of the parish and at the top of it there is a 3 dimensional model of St. Michael's Church.



Figure 14: St Michael's Church located along Church Avenue.



Figure 16: Parkhill Hotel, elegant country house hotel, located north of the Neighbourhood Plan Area.

Special local buildings, taken from Oulton Design Guidelines & Codes, AECOM 2021

This section on the Natural Environment and the policies it contains aims to deliver the following neighbourhood plan objectives for Oulton:

Objective A: *Ensure the natural environment is a key consideration in all decisions about how Oulton changes;*

Objective B: *Conserve and enhance Oulton's ecological network;*

Objective E: *Promote sensitive development that protects and enriches the landscape of the parish, safeguarding key views;*

Objective F: *Respond to climate change, promoting sustainable development and energy efficiency;*

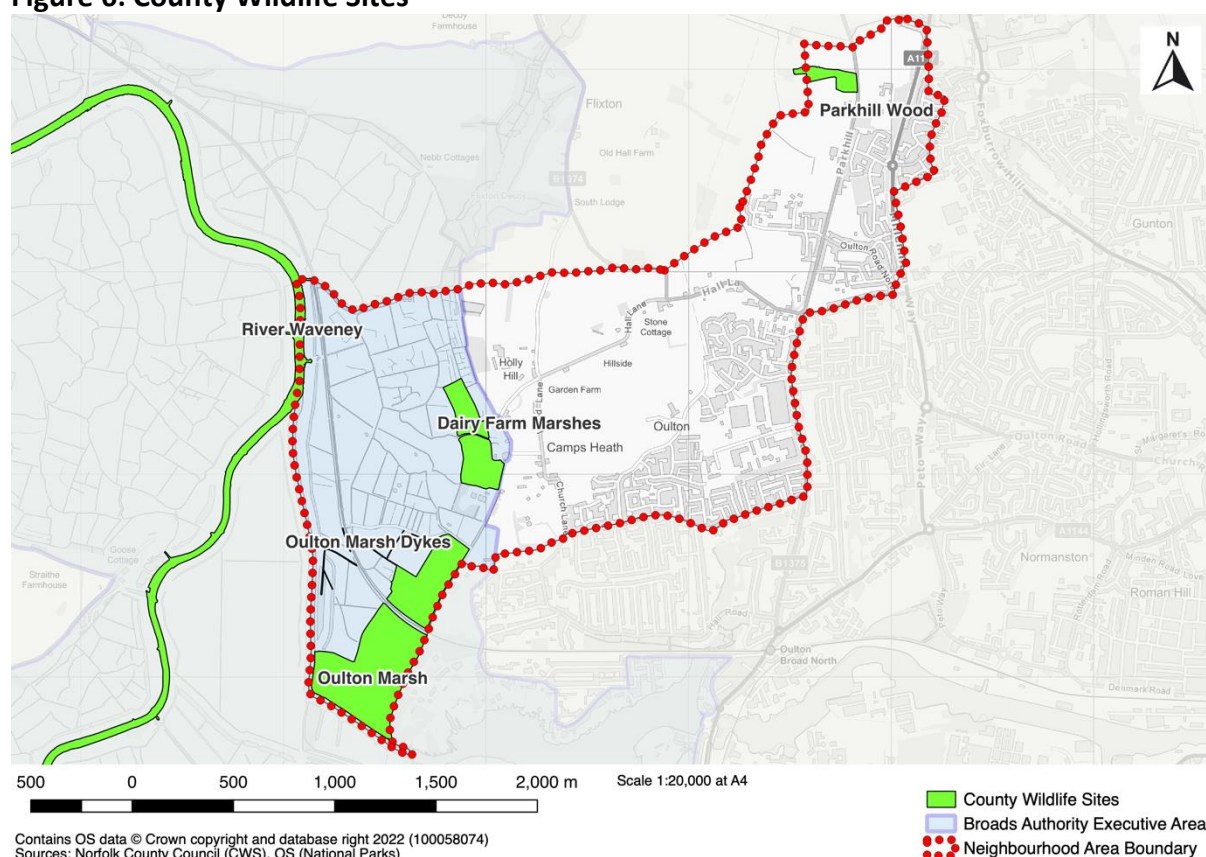
Objective H: *Protect important green spaces;*

Objective I: *Promote access to the countryside for recreation and enjoyment.*

- Oulton Neighbourhood Plan 2021-36 20

areas and walks have already been established and the park is a great place for walkers, joggers, horse riders, picnics and fruit picking.

Figure 6: County Wildlife Sites



63. Legislation and the National Planning Policy Framework (Chapter 15) affords considerable support for protecting and enhancing key landscapes and areas of value in terms of biodiversity. This includes the need for biodiversity net gains in developments, including through green infrastructure networks. The National Planning Policy Framework supports the mapping of ecological assets and networks, including for enhancement and creation. Furthermore, it covers the protection of existing green open spaces and creation of new ones. Linked to this is the introduction of Local Nature Recovery Strategies, which will establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits.
64. The Environment Act (2021) requires all development schemes to deliver a mandatory 10% biodiversity net gain (BNG) to be maintained for a period of at least 30 years. The concept seeks measurable improvements for biodiversity by creating or enhancing habitats in association with development. Development proposals must 'leave biodiversity in a better state than before'. This will become law mid-2023, with secondary legislation and detail yet to come. There will be three ways to deliver BNG, onsite within the red line, off site locally with biodiversity enhanced in conjunction with nearby landowners, or through statutory credits. The requirement for BNG is in addition to following the usual mitigation hierarchy to avoid, mitigate or compensate for biodiversity losses. Some developers are already designing net gain into their

development projects and as set out above, the National Planning Policy Framework encourages the net gain approach, though the requirement to measure this or meet a particular level of BNG is not yet mandatory nationally or within the East Suffolk Council and Broads Authority area.

65. Policy WLP8.34 of the East Suffolk Waveney Local Plan, and Policies SP6 and DM13 of the Broads Local Plan reflect the National Planning Policy Framework in terms of conservation and enhancement of the natural environment, including ecological gains and creating improved networks. Proposals are not supported where they directly or indirectly impact on locally recognised sites, including County Wildlife Sites, Biodiversity Action Plan habitats, unless new opportunities to enhance green infrastructure can be provided to mitigate or compensate for the loss. Any compensatory habitat is required to be equal or greater in size.

Biodiversity and Green Corridors

66. As part of developing the Neighbourhood Plan for Oulton, Green Corridors⁶ have been identified to connect areas of wildlife habitat across the parish. Each Green Corridor will be a focus for landowners and community groups to increase biodiversity and connectivity, for example, by planting more trees and hedges, by allowing grassland areas to grow wilder, and by installing features like bird and bat boxes. These will also be a potential target for BNG where developers need to deliver improvement offsite.
67. The Green Corridors in **Figure 7** and shown on the **Policies Map in Appendix A** have been identified according to the following principles:
- The location of sites which are designated for their wildlife importance, including Dairy Farm Marshes County Wildlife Site (CWS), Oulton Marsh CWS, and Park Hill Wood CWS
 - Between these designated sites, to enable high quality core habitats to be connected by corridors of habitat;
 - In other locations where existing Priority Habitats or habitats such as woodland and hedges can be connected and augmented; and
 - Areas identified as National Habitat Enhancement Zone 2, where opportunities to support habitat creation and enhance ecological corridors should be explored⁷.
68. The Green Corridors link the key blocks of habitat in the Oulton area, identifying where there is likely to be best opportunity for improving ecological connectivity. Further work to determine the condition of existing habitat and engagement with the local community and landowners to identify the exact location and nature of improvements will take place over the course of the Neighbourhood Plan and beyond. In this respect the mapped corridors are indicative, as it may be that the best opportunities to improve or create habitat arise adjacent or just outside of the corridors. These

⁶ A Green Corridor is sometimes referred to as an Ecological Corridor or Network, a Wildlife Corridor, or a Green Infrastructure Corridor. See <https://www.gov.uk/guidance/natural-environment#green-infrastructure>.

⁷ Identified by Natural England

corridors are hugely important to Oulton's residents. Their inclusion in the Neighbourhood Plan was supported by 95% of respondents to a survey.

69. Green Corridors benefit wildlife and people. Mammal species such as hedgehogs and bats, many species of birds including barn owls and yellow-hammers, and numerous insect and plant species require continuous habitat features to thrive. Many wildlife species have reduced in abundance because of habitat destruction and fragmentation, and Green Corridors will go some way to reduce this trend in Oulton.
70. In addition to wildlife benefits, green corridors can be combined with other uses such as footpaths, which means there would also be benefits for residents and visitors in Oulton. Spending time close to nature is good for mental and physical wellbeing, and these Green Corridors would increase the opportunity for people to do this, either through recreation on publicly accessible land or through assisting with conservation activities. There is also evidence that Green Corridors can mitigate flooding by intercepting and slowing run-off in high rainfall events⁸. Sustainable Drainage Systems (SuDS) can be used to provide multiple additional benefits as well as water management, such as wildlife, biodiversity and recreation.

Policy 4: Biodiversity and Green Corridors

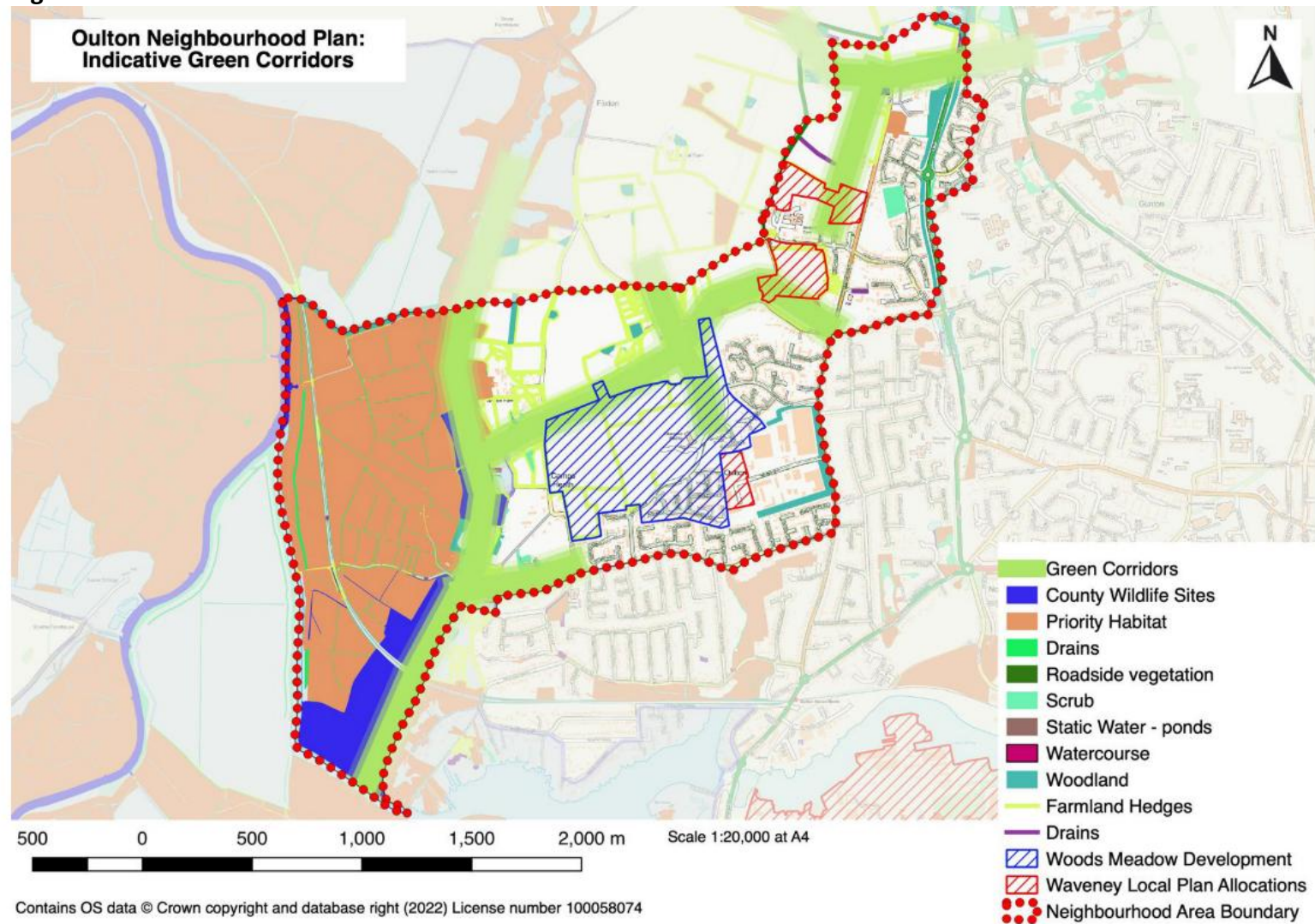
New development proposals must recognise the identified Green Corridors (see **Figure 7** and the **Policies Map in Appendix A**) and address the following matters:

- a) Development within the indicative extent of a Green Corridor must deliver measurable net gains in biodiversity which exceed national or local policy requirements or deliver qualitative improvement on site or to the corridor. This should relate to quality of habitat or its ability to facilitate movement of fauna.
- b) Proposals adjacent to the indicative extent of Green Corridors must maintain and where possible enhance the function of the corridor and demonstrate how they will mitigate any significant harm to the wildlife using it. Harm is likely to be caused by the introduction of barriers, such as housing, roads, hard landscaping and artificial lighting, the re-direction of water sources or water courses, or the insensitive management of habitats e.g., hedge cutting in the bird breeding season.
- c) Proposals that support improvement to the function of a Green Corridor will be looked upon positively.
- d) In the parish, if a development, following through the metric related to biodiversity net gain as required by the Environment Act 2021, needs to deliver the net gain off site, then the first preference will be to deliver this net gain in or adjacent to the indicative extent of the green corridors, working with local landowners.

Consideration will need to be given to the impact that allocated sites within the local plan have on the Green Corridors. Where possible the principles above should be followed.

⁸ https://www.north-norfolk.gov.uk/media/5037/norfolk-green-infrastructure-mapping-project-july_18_v4.pdf

Figure 7: Oulton's Indicative Green Corridors



Local Green Space

71. The National Planning Policy Framework sets out that specific areas of land that are demonstrably special to the local community may be protected against development through designation as Local Green Space. These are often found within the built-up area and contribute to the character of a settlement. These can vary in size, shape, location, ownership and use, but such spaces will have some form of value to the community and help define what makes that specific settlement what it is.
72. The designation should only be used where:
- The green space is reasonably close to the community it serves;
 - The green area is demonstrably special to the community and holds a particular local significance, for example because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife; and
 - The green area concerned is local in character and is not an extensive tract of land.
73. A robust process has been followed to determine which green spaces within Oulton should be designated:
- a) Initial ideas were suggested by residents as part of consultation activities, with residents also asked to provide reasons as to why their ideas were special
 - b) These were reviewed to consider at a glance whether they would meet the national criteria for designation. Some suggestions such as highway verge or public footpaths were removed at this stage;
 - c) A site visit was undertaken by the working group and further evidence gathered on each of the remaining green spaces;
 - d) An assessment against the national criteria for Local Green Space was made for each of the potential areas;
 - e) Landowners were contacted to make them aware that their land was being considered for local green space designation and to invite them to make representations;
 - f) A final decision was made by the working group as to which green spaces to designate.
74. This Neighbourhood Plan designates 11 Local Green Spaces (LGS) for protection, these are identified in **Figure 8**, on the **Policies Map in Appendix A** and in individual maps in **Appendix C**. These are important not only for the wildlife they support, but provide significant quality of life benefits to residents, for example through encouraging recreation. Justification for each Local Green Space is found in **Oulton Neighbourhood Plan Local Green Space Assessment**.
75. The Local Green Space policy is important, as is the precise wording. Paragraph 103 of the National Planning Policy Framework sets out that policies for managing development within a Local Green Space should be consistent with those for Green Belt. **Appendix D** provides justification for the specific wording in **Policy 5**.

Policy 5: Local Green Spaces

The following areas are designated as Local Green Space for special protection:

1. Jenkin's Green and Pond
2. St Michael's Church and Churchyard
3. Community Centre Playing Field
4. Camps Heath Greenspace
5. Burial Grounds, near Union Lane
6. Brendon Way play area
7. Bloomsbury Close play area
8. Dunston Drive play area
9. Bowling Green, Camps Heath
10. Football Pitch, Camps Heath
11. Parkhill Woods County Wildlife Site

These will be protected from inappropriate development in accordance with Green Belt Policy, except for the following deviations:

New buildings are inappropriate development, with the only exceptions to this:

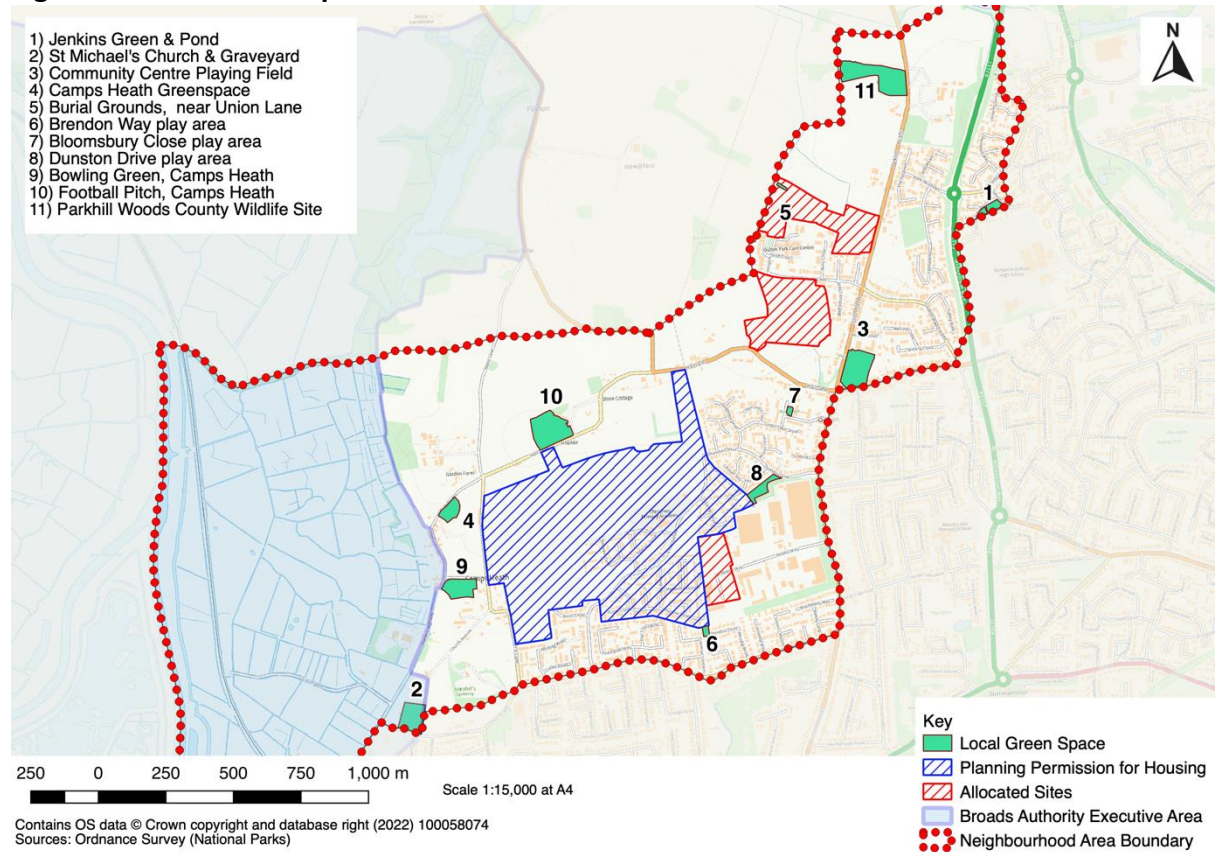
- a) Buildings for forestry or agriculture where the Local Green Space is used for commercial woodland or farmland;
- b) The provision of appropriate facilities in connection with the existing use of land where the facilities preserve the openness of the Local Green Space and do not conflict with the reasons for designation that make it special to the community, such as for recreation or ecology;
- c) The extension or alteration of a building if it does not impact on the openness or the reasons for designation that make Local Green Space special to the community; or
- d) The replacement of a building provided the new building is in the same use and not materially larger than the one it replaces.

Other appropriate development includes:

- a) Engineering operations that are temporary, small-scale and result in full restoration;
- b) The re-use of buildings provided that the buildings are of permanent and substantial construction; or
- c) Material changes in the use of land where it would not undermine the reasons for designation that make it special to the community.

Proposals that are on land adjacent to Local Green Space are required to set out how any impacts on the special qualities of the green space, as identified by its reason for designation, will be mitigated.

Figure10: Local Green Space



Important Views

76. The National Planning Policy Framework sets out at Paragraph 174 that, “*Planning policies and decisions should contribute to and enhance the natural and local environment by ... protecting and enhancing valued landscapes*”. There are some specific views and vistas within Oulton that are of particular importance to the local community. These were originally suggested by residents as part of the Issues and Options consultation in 2020. Each of these was assessed by the working group and evidence gathered to demonstrate their special qualities. This can be seen in the Views Assessment document that accompanies the Neighbourhood Plan.
77. Overall, the Neighbourhood Plan seeks to protect ten public views for future enjoyment. The intention is not to stop development within these views, but to ensure that their distinct character is retained. Within the views afforded protection through **Policy 6** development that is overly intrusive or prominent will not be supported locally. Any proposals within these views will need to demonstrate that they are sited, designed and of a scale that does not significantly harm them.
78. Viewpoint 3 overlooks Oulton Country Park, part of the Woods Meadow development. The viewpoint does not hinder phase 2 of this development, unless plans change by encroaching onto the Country Park allocated land. As the Country Park grows, a 360-degree viewpoint from higher ground will show different fields, hay meadows, trees/hedges and wildlife. The Northern view will show the open beauty looking towards the proposed picnic area with horse paddocks surrounded by flowering hedges. The southern view from the open higher ground will look down towards the proposed play area with children enjoying themselves, tree lines, fields and wildlife.

Policy 6: Protection of Important Local Views

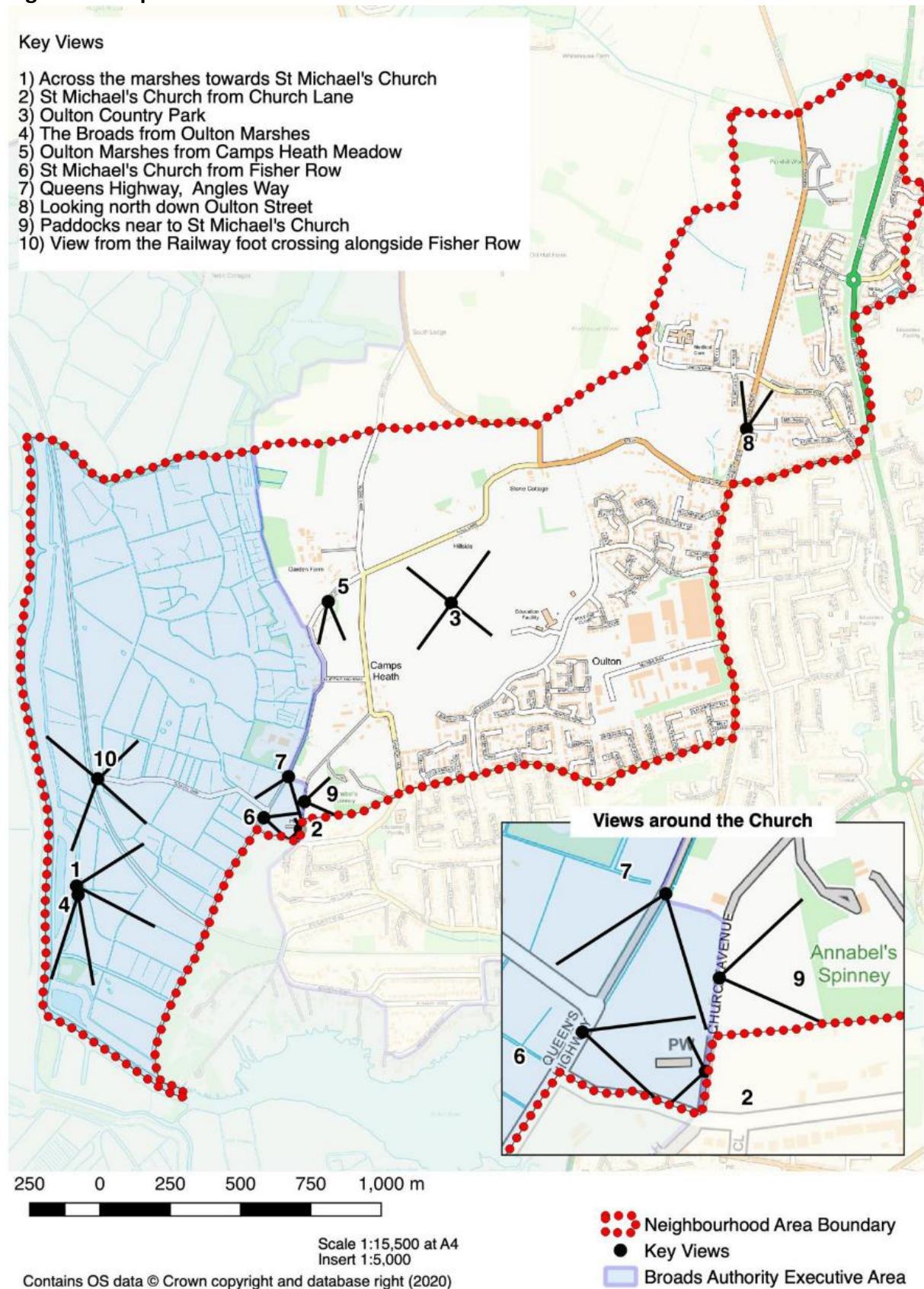
The views identified in **Figure 11** and in the **Policies Map in Appendix A** and described in **Oulton Neighbourhood Plan Views Assessment Document** are important public local views in Oulton. Many of which depict the setting for the Broads.

Development proposals that would adversely affect these key views will not be supported. Proposals are expected to demonstrate that they are sited and designed to be of a form and scale that avoids or mitigates any harm to the key views and setting of the Broads.

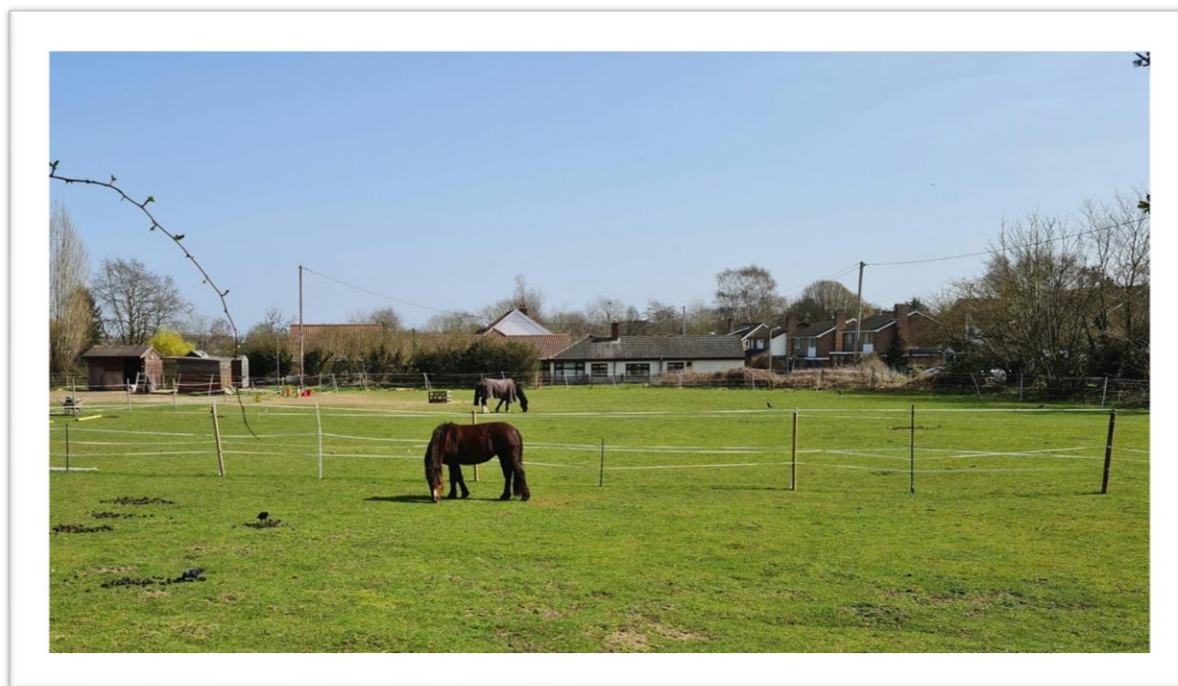


View across the marshes towards St Michael's Church (View 1)

Figure 11: Important Local Views



The Paddocks Special Character Area



Paddocks near to St Michael's Church

79. There are a number of areas within the Parish that have a distinctive character and sense of place, but perhaps none more so than the array of paddocks around Camps Heath. These established areas have a mature quality and identity that sets them apart. The landscape around Camps Heath between the built-up area and the marshes is valued by the community (see **Figure 12** and the **Policies Map at Appendix A**).
80. Many areas of countryside are understandably valued and seen as important by local residents, but the paddocks both within and surrounding Camps Heath help make the area of significant importance. The area is unique in that it has a strong equestrian history situated on the edge of a significant nature reserve and marshland. The beauty of the local area is enhanced and complemented by the long established and well used grazing pastures used by horse owners and farmers alike. Camps Heath has a working livery and manage, along with numerous stables, paddocks and outbuildings. The quiet lanes and open paddocks, on the edge of the marshland, create a unique and special part of Oulton. The area has hills of green pastures giving unspoilt views of marsh and grazing land managed by the Suffolk Wildlife Trust. Such an unspoilt area of the parish needs to be protected in its own right as losing such a characteristic and historic part of Oulton would be a huge and unthinkable loss to the local area. **Figure 12** and the **Policies Map at Appendix A** shows these as a Special Character Area.
81. This area falls between two Landscape Setting Areas (8 and 9) in the Great Yarmouth and Waveney Settlement Fringe Landscape Sensitivity Study⁹. Area 8, adjacent the Broads is considered to have a very low landscape capacity, which means there is very limited potential to accommodate any scale of new development. The area is

⁹ [Settlement-Fringe-Landscape-Sensitivity-Study.pdf \(eastsuffolk.gov.uk\)](#)

identified as having historic continuity, retaining some significant historic features which contribute to its sense of place. It is also identified for its extensive equestrian land-use. Area 9, which runs parallel to the neighbourhood area boundary is identified to have high landscape capacity, meaning that large, medium and small-scale new development could potentially be accommodated. The assessment does state that the northern edge of this area (which falls within the Special Character Area) may be more sensitive than other parts of the setting area.

82. Unlike Conservation Areas, which feature groups or larger areas of buildings of architectural or historic importance, Special Character Areas rely less on the intrinsic value of individual buildings. Rather, they can be selected on account of their strong landscape elements or inherent and distinctive land usage and are important for their character and the contribution which they make to the local environment or setting; the paddocks are a highly distinctive feature of Camps Heath. The designation is therefore not just concerned with the landscape, it is how that landscape feels as a result of the use as paddocks.
83. **Figure 12** and the **Policies Map in Appendix A** defines the Paddocks Special Character Area and their location with respect to recent development and allocations in the East Suffolk Waveney Local Plan. The Special Character Area is adjacent the Woods Meadow development, which includes the new Oulton Country Park.

Policy 7: Paddocks Special Character Area

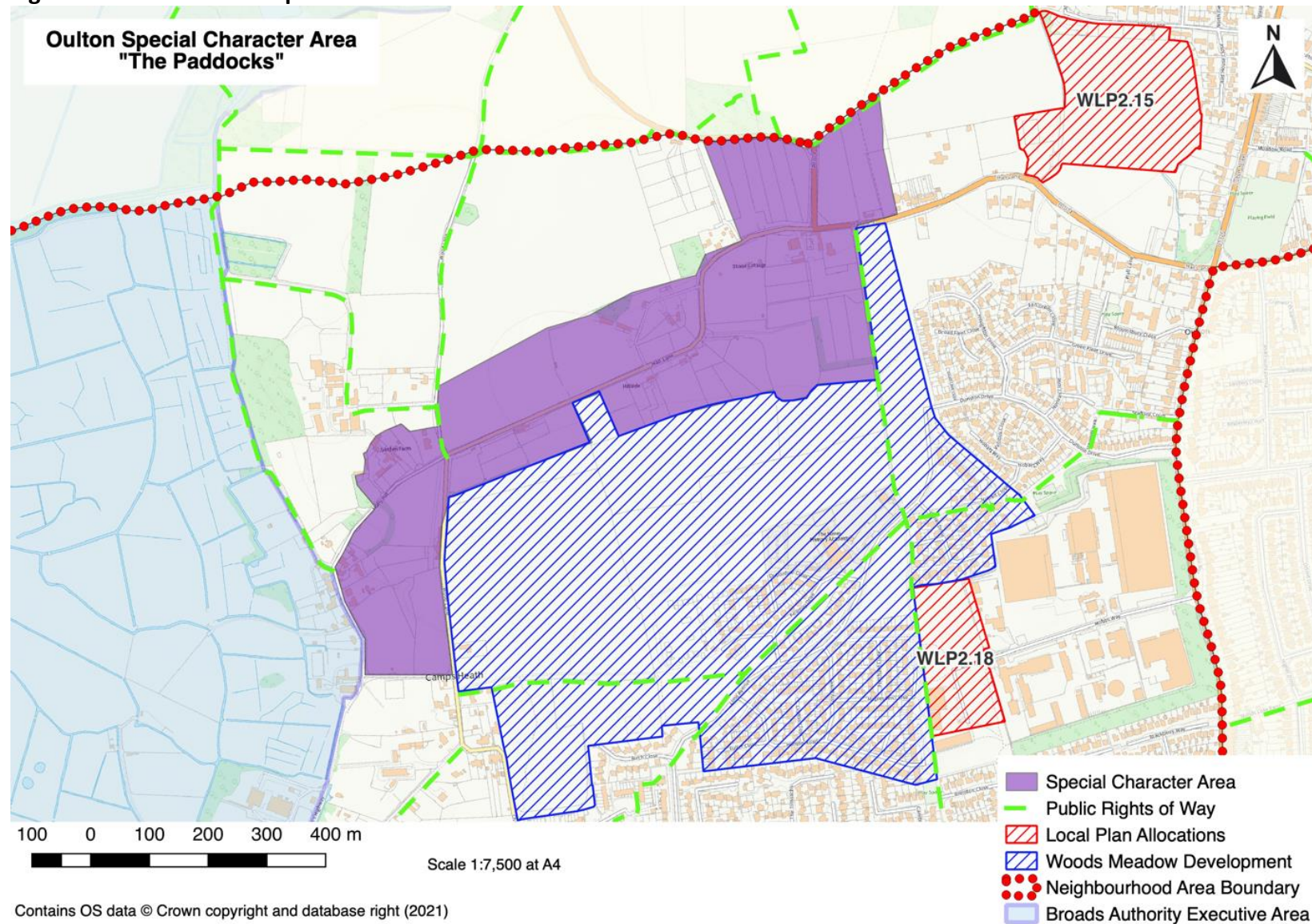
In the Paddocks Special Character Area, defined in **Figure 12** and on the **Policies Map at Appendix A**, development or redevelopment must respect those features or characteristics which are key to maintaining the special and distinctive quality of the area.

A proposal will not be supported where the harm caused to the special character as a result of the impact of a proposed scheme is not justified by the public benefits that would be provided.

The Special Character Area is located adjacent to the Broads which has equivalent status of a National Park. Any development proposals must:

- a) Be of a scale and type so as not to impact on the character of the Broads; and
- b) Retain mature vegetation, where possible enhancing this with additional native planting; and
- c) Ensure boundary fencing (where used) is of an appropriate size and style.

Figure 12: The Paddocks Special Character Area



Built and Historic Environment

This section on the Built and Historic Environment and the policies it contains aims to deliver the following neighbourhood plan objective for Oulton:

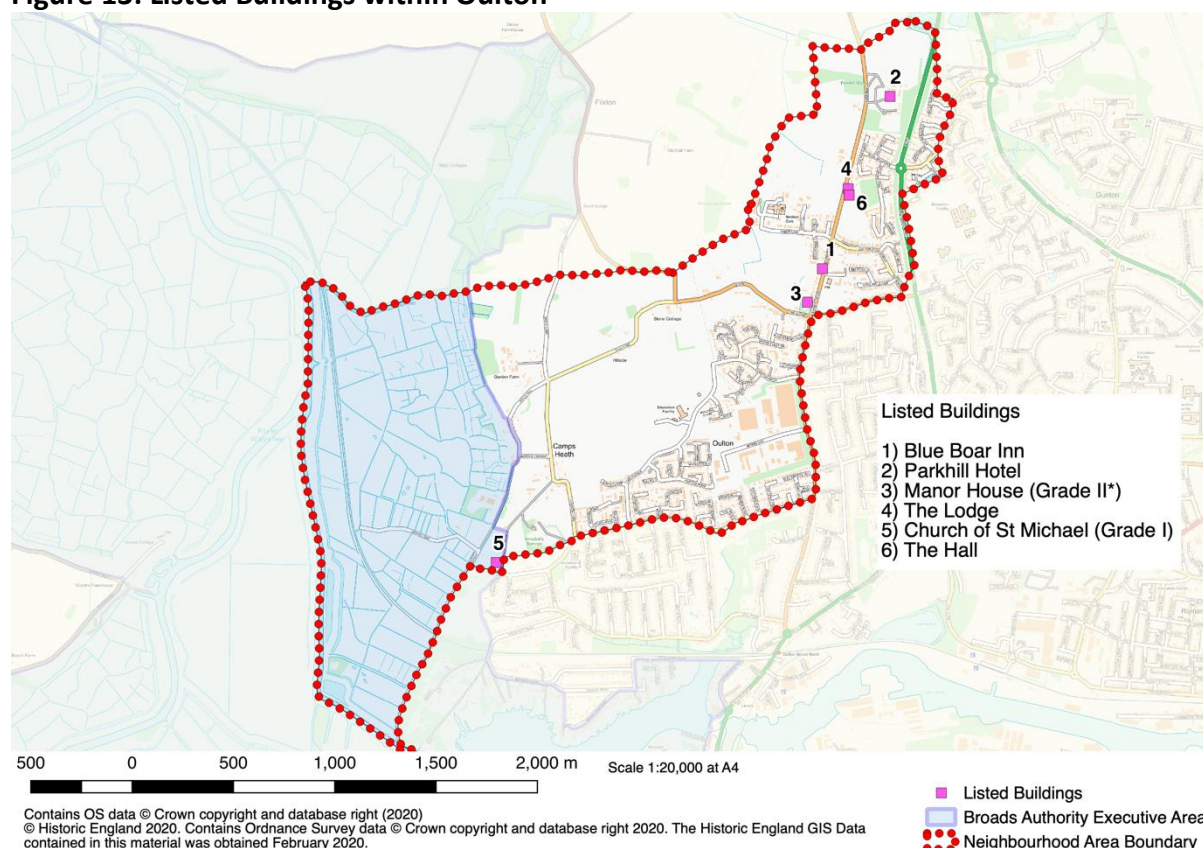
Objective G: The integrity, character, and appearance of the historic environment of the parish will be conserved and where possible enhanced

84. It is believed that the village of Oulton was originally clustered around St Michael's Church, approximately c1100. Later, it was moved to where it is today, and it has gradually evolved over the last two hundred years. Prior to this there were few buildings, and most villagers were engaged in agriculture. A manor, named Houghton, existed within the locality during the 13th - 15th centuries. Houghton means 'high' or 'hill' farm/enclosure/settlement. The name Oulton may have derived from Houghton. The present Manor House in the village is referred to as High House by local people¹⁰. The terrace houses on the eastern side of Oulton Street and in Oulton Road (north), built in the mid-late 1800s and early 1900s must have increased the population considerably. In 1971, the built-up area reached the form the village has today.
85. Over the years there have been a number of parish boundary changes. Up until 1904 the parish included Oulton Broad. Most recently, in 2018, the boundary with Lowestoft was amended. Additionally, Oulton is considered part of the Lowestoft area from an East Suffolk Waveney Local Plan perspective and the Lowestoft settlement boundary extends to cover the built-up area of Oulton parish.
86. Suffolk Heritage Explorer lists 69 historic assets within the parish, including archaeological finds dating back to prehistoric times. This includes Bronze Age and early Iron Age pottery and enclosure systems. In September 2020 excavation ahead of housing development at Woods Meadow revealed a nationally significant discovery, a large Anglo-Saxon cemetery, dating back to as early as the 6th century. Over 200 sets of remains were discovered, with some graves containing copper-alloy brooches, wrist clasps, strings of beads made of amber and glass, small iron knives and silver pennies. Excavation of such cemeteries in their entirety is rare in England. The site appears to represent a farming community buried over several generations with male, female, child and infant burials.
87. There is no designated conservation area, but the parish has 6 listed buildings, see **figure 13**, one of which, the Church of St Michael is Grade I listed which means it is of exceptional interest nationally. Only 1% of buildings fall into this category. St Michael's Church is somewhat distant from the village of Oulton, it stands on high ground overlooking marshlands to the west. Another building of significance is Manor House, which is a Grade II* listed building, formerly known as High House. This is very late

¹⁰ Taken from a local website providing historical information about the parish:
<https://awalkaroundoulton.weebly.com>

16th century, though altered considerably during the 19th century. There are no scheduled monuments or buildings at risk within the parish.

Figure 13: Listed Buildings within Oulton



88. The Government's Planning Practice Guidance recognises that there are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets. In some areas local authorities keep a local list of non-designated heritage assets, incorporating those identified by neighbourhood planning bodies. The National Planning Policy Framework determines that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application.
89. The East Suffolk Waveney Local Plan Policy WLP8.37 sets out that proposals should seek to conserve or enhance heritage assets and their settings and Policy SP5 (Historic Environment) and Policy DM11 of the Broads Local Plan both cover heritage assets. WLP8.38 specifically covers Non-Designated Heritage Assets, this sets out that Neighbourhood Plans can identify other buildings and assets of historic or local significance, subject to meeting an agreed criteria, as set out in **Figure 14**. Historic England's Local Heritage Listing Advice Note¹¹ was also reviewed and useful in identifying and assessing heritage assets.

¹¹ <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag301-local-heritage-listing/>

Figure 14: East Suffolk Local Listing Criteria

Archaeological Interest	Architectural Interest	Artistic Interest	Historic Interest
<ul style="list-style-type: none"> Recorded in the Suffolk County Historic Environment Record 	<ul style="list-style-type: none"> Aesthetic value Known architect Integrity Landmark status Group value 	<ul style="list-style-type: none"> Artistic value Known designer 	<ul style="list-style-type: none"> Association Rarity Representativeness Social and communal value

90. A comprehensive review by the working group of designated heritage assets and the Historic Environment Record¹² was undertaken prior to considering whether there were other assets of heritage value worth identifying in the Neighbourhood Plan. Residents were asked for their suggestions in relation to this as part of the first community consultation, and overall 10 suggestions were put forward of heritage assets worthy of inclusion. Further evidence on these was collated by the working group and an assessment undertaken against East Suffolk's listing criteria.
91. The following assets are identified in Oulton Neighbourhood Plan as non-designated heritage assets, as shown on **Figure 15** and on the **Policies Map at Appendix A**. Further detail of how each of these assets meets East Suffolk's local listing criteria is set out in **Oulton Neighbourhood Plan Non-Designated Heritage Assets Assessment Document**. Owners of these assets had an opportunity to respond to the Regulation 14 consultation on the draft plan. Should an owner wish for their asset to be removed from the list subsequently they should contact the Parish Council for consideration. It should be noted that these are not the only non-designated heritage assets in Oulton, just those considered of local importance when developing this plan.
92. Suffolk County Council manages the Historic Environment Record for the county. Non-designated archaeological heritage assets would be managed through the National Planning Policy Framework. Suffolk County Council Archaeological Service Advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of the area at an appropriate stage in the design of new developments, in order that the requirements of the National Planning Policy Framework, East Suffolk Core Strategy, East Suffolk Waveney Local Plan (policy WLP8.40) and Local Plan for the Broads (policy SP5) are met. Suffolk County Council Archaeological Service is happy to advise on the level of assessment and appropriate stages to be undertaken.

¹² <https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/what-is-the-historic-environment-record/>

Policy 8: Heritage Assets

The character, significance and appearance of existing heritage assets will be conserved and where possible enhanced, in line with their significance.

The non-designated heritage assets listed below (shown in **Figure 15** and on the **Policies Map in Appendix A**) have considerable local significance.

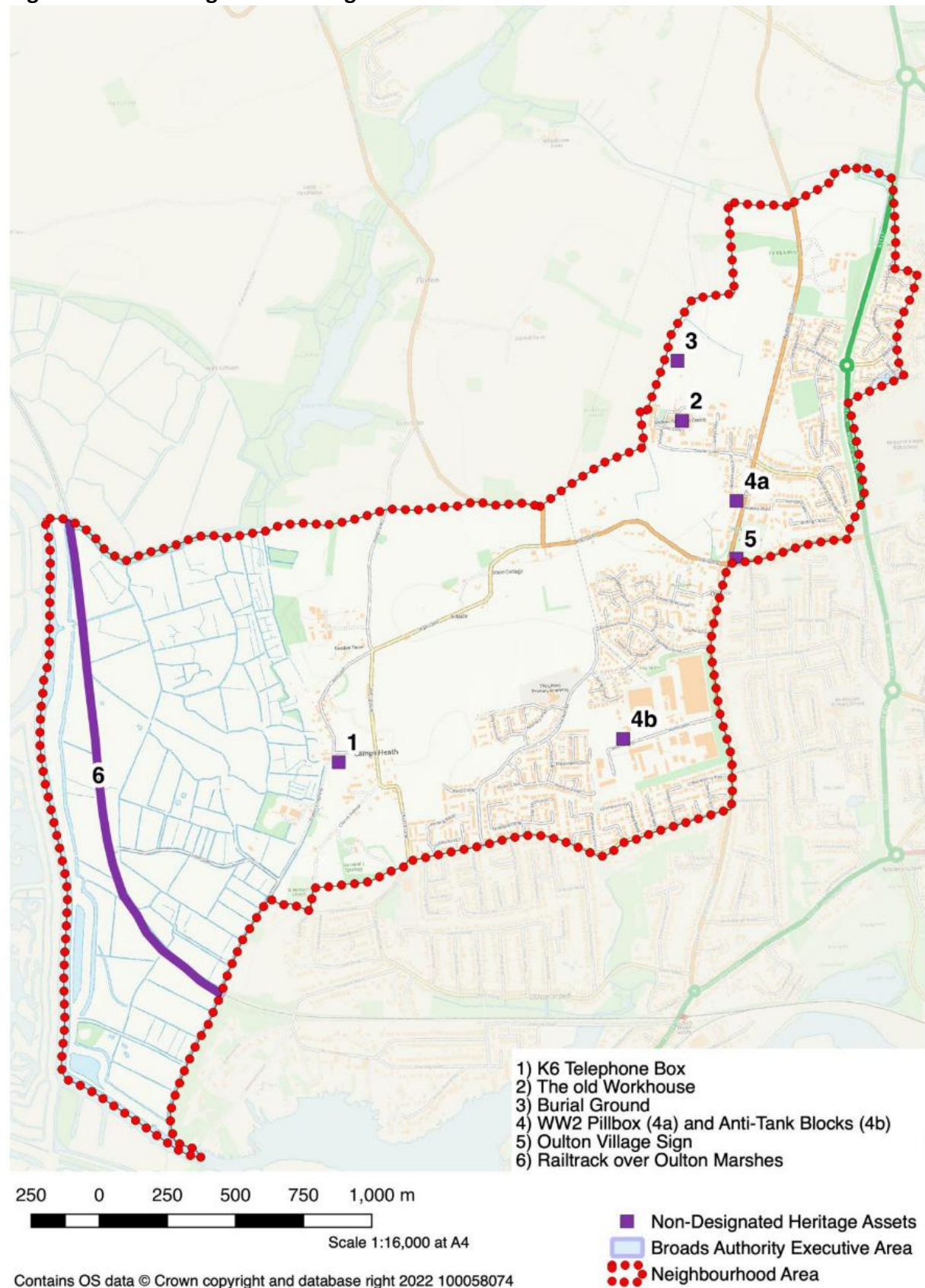
- K6 Telephone Box
- The old workhouse
- Burial ground
- WW2 pillbox and anti-tank blocks
- Oulton village sign
- Railtrack over Oulton Marshes

Development proposals relating to these assets should be considered in accordance with **Policy WLP8.38** of the East Suffolk Waveney Local Plan, or **Policy DM11** of the Local Plan for the Broads.

Proposals that are adjacent non-designated assets should demonstrate that consideration has been given to preserving:

- a) The heritage asset and its distinctive historic features as identified in the **Oulton Neighbourhood Plan Non-Designated Heritage Assets Assessment Document**;
- b) The positive elements of its setting that contribute to the asset's historic significance; and
- c) The contribution that the asset and its setting makes to the character of the local area.

Figure 15: Non-designated Heritage Assets



This section on the Natural Environment and the policies it contains aims to deliver the following neighbourhood plan objectives for Oulton:

Objective J: Reduce the impact of traffic;

Objective K: Support community spirit by improving connections to local services and facilities, especially by making walking and cycling safer.

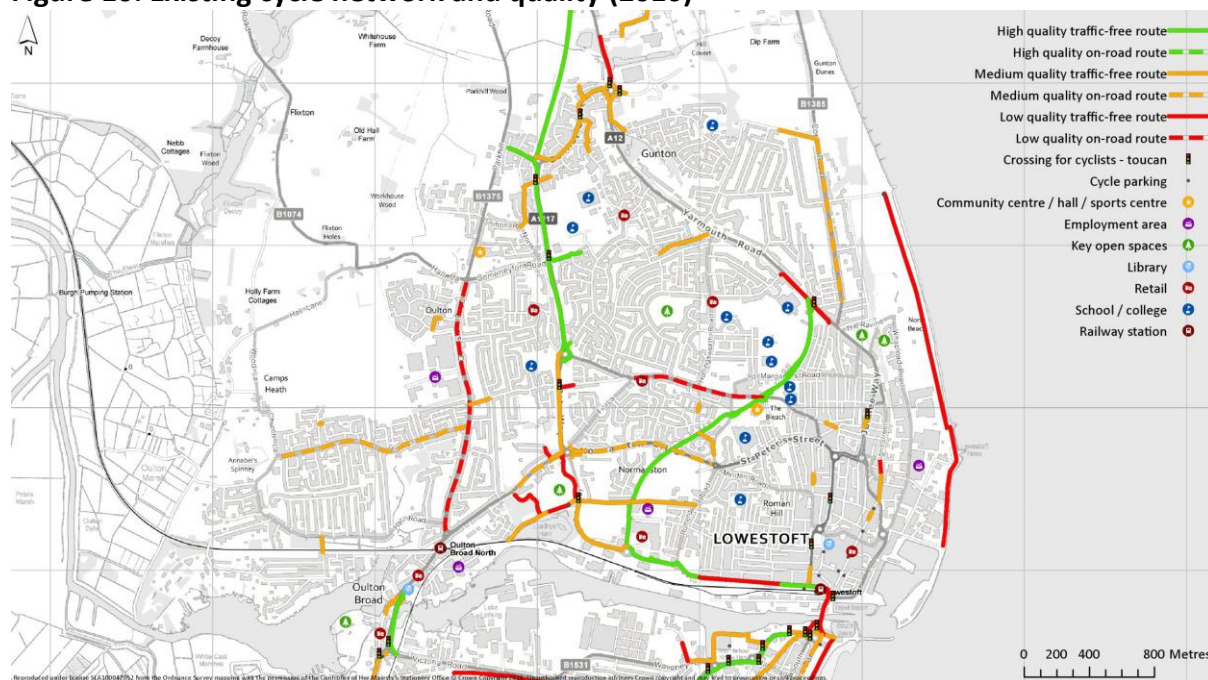
93. The National Planning Policy Framework, the East Suffolk Waveney Local Plan and the Broads Local Plan support the promotion of sustainable transport such as walking and cycling, which not only helps people get from A to B, but does so in a way that improves health and reduces emissions. There is a reasonable range of local facilities in Oulton, such as dental practice, recreation ground, church, centre for people with learning disabilities, the Blue Boar public house, and community centre. Lowestoft itself is only a 10–12-minute cycle ride away. Lowestoft has a wide range of services and there is the district centre at Oulton Broad. Regular bus services to Lowestoft provide access for those facilities that are beyond walking distance. Access to a wider range of services further afield by train is an option with the train station at Oulton Broad being around 1-2km away for most.
94. Local people value the good access they have to local services, and it is important that these are retained. The planned housing growth could help with this by keeping them viable. The National Planning Policy Framework supports the protection of existing village services and the delivery of new ones in order to maintain the vitality of communities. East Suffolk Waveney Local Plan Policy WLP8.22 – Built Community Services and Facilities – supports new facilities and provides some protection for existing ones, especially Assets of Community Value. The Local Plan for the Broads also has a policy (SP16 and DM44) relating to this. There is therefore no need for a policy on protecting local services in the Neighbourhood Plan.
95. The evidence base for the neighbourhood plan found that many people in the parish live quite close to where they work, but that very few walk or cycle to work. This suggests that there should be a big opportunity to promote sustainable transport by improving walking and cycling in particular. Furthermore, a small proportion of households have no car and rely heavily on public transport, walking and cycling. For other households with just the one car, many of the household members will not have the use of the vehicle if it is used for commuting and so not available for much of the day.
96. Policy WLP8.21 – Sustainable Transport – in the East Suffolk Waveney Local Plan covers the need to promote sustainable transport modes such as cycling and walking. It requires new development to link with existing walking and cycling routes and to enhance them where required. It does not really cover potential cycle routes that do not currently exist and nor does it cover improvements to bus waiting facilities. Policy

SP8 – Getting to and around the Broads - in the Local Plan for the Broads promotes sustainable travel improvements, in particular to walking and cycling links connecting with the waterside.

97. There are a range of strategies which support improved access, including Suffolk County Council's Green Access Strategy (2020-2030)¹³. This sets out the Council's commitment to enhance public rights of way, including new linkages and upgrading routes where there is need. The strategy also seeks to improve access for all and support healthy and sustainable access between communities and services through development funding and partnership working.
98. Looking at the infrastructure for sustainable transport, there are a number of issues. The availability of bus stops is not too bad, but many bus stops are just a post and flag, with no shelter. They often do not have raised kerbs to help those with mobility difficulties get on and off the bus. Within the built-up-area of the parish the roads are subject to 30mph speeds limits, or even 20mph, which should make cycling reasonably attractive for the more confident cyclist, and there are footways too for pedestrians, although sometimes these are quite narrow, sometimes only on one side of the road, and sometimes absent completely, perhaps with just verge.
99. Lowestoft has the most significant provision of cycle facilities in the District, helping to provide access to work and other facilities. There are some cycle routes in Oulton, see **Figure 16**, with these being mainly on-road which many novice cyclists will find unappealing, especially if the road is heavily trafficked. Some streets, such as Oulton Street, are also very narrow and hazardous for cyclists. The Waveney Cycle Strategy 2016 identified the key on-road routes as either medium quality (such as on Sands Lane) or of low quality (on Gorleston Road for example). The network certainly requires improvement and indeed some improvements are being made on the Woods Meadow development. Traffic is a concern locally, particularly the speed of traffic, and this suggests a need to provide vulnerable road users such as cyclists with safer, maybe off-road, routes; the route on Millennium Way is a good example.
100. There is strong support in the community for improving walking and cycling links and associated infrastructure such as benches and cycle racks, and wider pavements. Of the various types of improvements for sustainable transport, new cycle routes were the most important, followed by improvements to bus stops and wider pavements. Good access to services and facilities is one of the qualities of Oulton that local people most value.
101. Developments will be expected to take all reasonable opportunities to provide for safe and convenient access for cyclists, pedestrians and public transport users. This could include providing new or enhanced facilities as well as improving the physical condition of existing facilities. As required by national and local policy, it is expected that housing and other development will contribute towards improving such local services and infrastructure, including improving bus stops and pavements.

¹³ <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/suffolk-green-access-strategy-2020-2030.pdf>

Figure 16: Existing cycle network and quality (2016)



Source: Waveney Cycle Strategy

102. East Suffolk Council is currently preparing a Cycling and Walking Strategy for East Suffolk, building on the existing Waveney Cycle Strategy (adopted in 2016). The consultation on the draft strategy took place between November 2021 and January 2022 and adoption is expected in autumn 2022¹⁴. Cycling and walking opportunities were shared with East Suffolk Council during its initial engagement period (19 October 2020 -7 December 2020). The emerging C&WS involves the identification of Key Corridors (cohesive cycling and walking routes through and between settlements) and one of these Key Corridors should be through Oulton, that would link the Woods Meadow development, and the two East Suffolk Waveney Local Plan allocations in Oulton (WLP2.14 & WLP2.15).
103. While using the car is sometimes the only practical way to get around for some trips, the policy promotes the use of more sustainable modes of transport. The benefits vary from reduced air pollution, reduced CO₂ emissions contributing to climate change, better health and well-being, less congestion and less money spent on fuel. Developers can contribute by encouraging this, for example with a travel plan and by providing infrastructure.
104. To promote sustainable access, applications must, where reasonable to do so, be able to demonstrate that the site is accessible by cycling and walking and that future occupiers will be able to walk or cycle to most of the local services and facilities and to a bus stop. Contributions and improvements must be proportionately related to the development. These may include the improvements to the Cycling and Walking Strategy network, better bus waiting facilities, or the provision of entirely new footway or footpath links, or the improvement, such as the widening, of existing ones.

¹⁴ [Draft East Suffolk Cycling and Walking Strategy » East Suffolk Council](#)

105. Vehicle use itself can also be made more sustainable. There is considerable local support for the provision of electric vehicle charging points around the parish, whilst **Policy 3** requires such provision as part of new developments.

Policy 9: Sustainable Transport

Development proposals will need to demonstrate how cycling will be promoted, particularly with regard to improved safety. Improvements should be delivered to support achievement of the East Suffolk Council Cycling and Walking Strategy. This includes provision of secure and convenient cycle storage.

Major development proposals must demonstrate safe, attractive and convenient walking and cycling routes to local services and community facilities, especially to the primary schools, Mobbs Way, play areas and bus stops. New developments will be expected to connect with existing footpaths and footways, and where necessary extended or upgraded facilities will be required.

Reasonable opportunities to promote and enhance the use of public transport, such as improved waiting facilities and suitable road layouts, will need to be taken to improve the sustainability of proposals.

Community Action 1: Electric Vehicle Charging Points

The community aims to ensure that charging points are provided in public places.

Community Action 2: Permissive Paths

The Parish Council will work with landowners and public bodies such as Suffolk County Council and the Broads Authority to support the retention of and establish new permissive paths, including those for horse riders.

Traffic and traffic Speed

106. Traffic is a concern, particularly the speed of traffic on some roads through Oulton. Although most of the built-up-area is subject to 30mph or even 20mph speed limits, local reports suggest that average speeds are in excess of the speed limit. Speeding traffic compromises safety, raising the risk of serious injury, and it may deter some people from cycling on-road.
107. The A1117 Millennium Way cuts through part of the parish and this probably diverts a lot of strategic traffic coming off the A12 out of the parish in the most part. The road that dominates is perhaps the B1375 Oulton Street/Gorleston Road. Traffic can be quite heavy and this in places combines with narrow footways, resulting in a feeling

of traffic dominating. When open next year, the Third River Crossing at Great Yarmouth will help to reduce the volume of traffic coming through the village. The website CrashMap indicates that most accidents in the Parish happen on the B1375, and all clusters of more than one accident in the last five years are at junctions on the B1375, such as Union Lane/Oulton Road North. Whilst encouraging sustainable transport could reduce traffic a little, reducing vehicle speeds could help to reduce the dominance and threat of traffic.

Policy 10: Traffic and Speed

New development will need to ensure speeds within the development and on the connecting local roads are appropriate for the type of development, both to promote sustainable transport as well as manage highway safety. This could include implementing specific schemes that help to reduce traffic speeds.

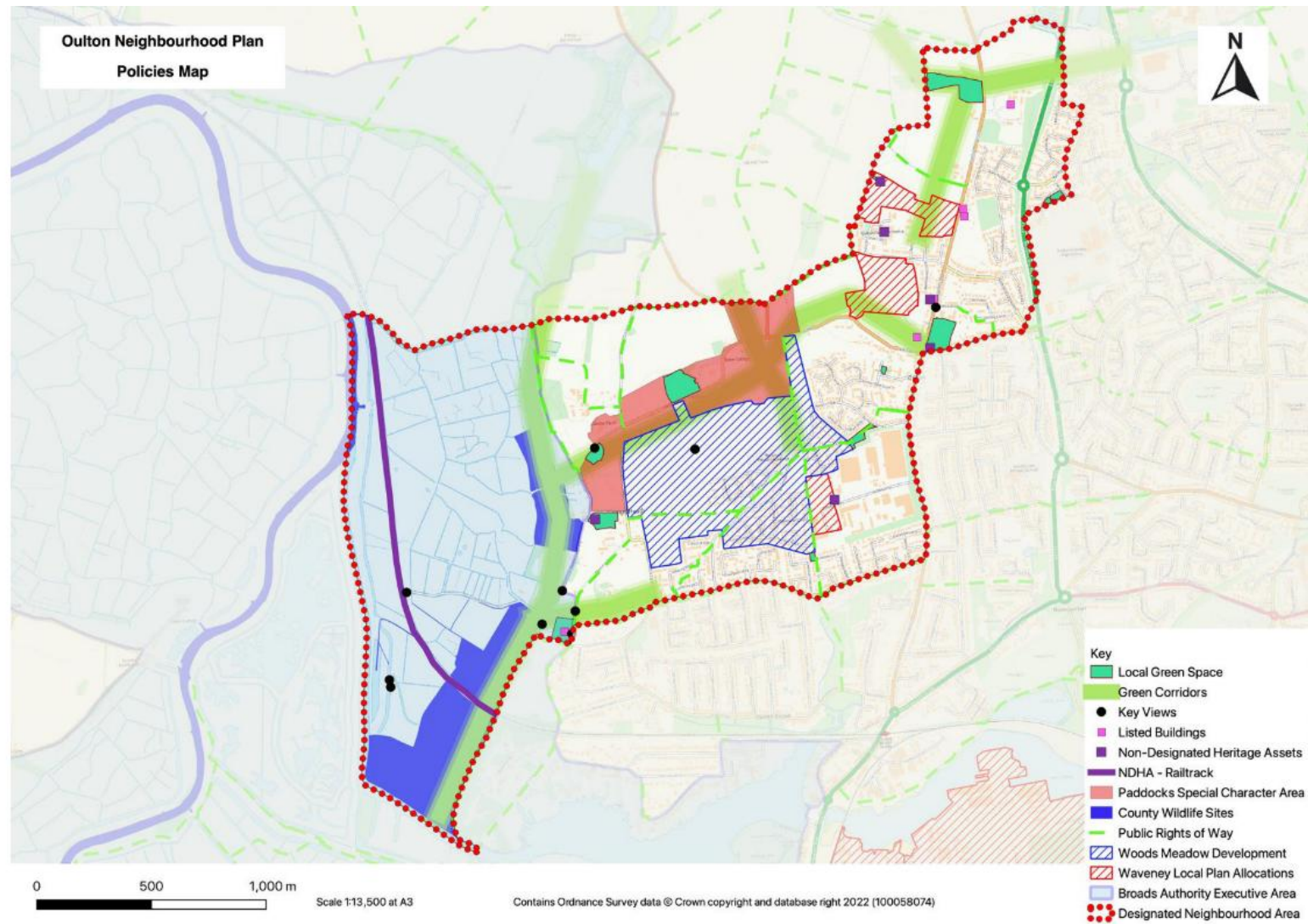
On major developments low speed limits will be reinforced through good design, in accordance with **Policy 3**.

108. A site of 2.8ha at Mobbs Way is allocated in the East Suffolk Waveney Local Plan for employment development, effectively extending the existing employment area. This is East Suffolk Waveney Local Plan Policy WLP2.18. The policy makes specific requirements for landscaping, an ecological survey, Transport Assessment and Travel Plan and archaeological investigation works. Existing permissions have been granted for light industrial and storage / distribution.
109. There have been issues for residents related to lorry parking on Mobbs Way and the Parish Council would like to engage with local businesses and Suffolk County Council with a view to addressing these concerns. The need to address the issue is heightened by the inclusion of Mobbs Way as part of the proposed cycle network.

Community Action 2: Mobbs Way

The Parish Council and wider community will work with local businesses and Suffolk County Council to address the issue of lorry parking on Mobbs Way.

Appendix A – Policies Map



Appendix B – Design checklist¹⁵

Because the design guidelines cannot cover all design eventualities, this section provides a number of questions based on established good practice against which the design proposal should be evaluated. The aim is to assess all proposals by objectively answering the questions below.

Not all the questions will apply to every development. The relevant ones, however, should provide an assessment as to whether the design proposal has taken into account the context and provided an adequate design solution.

Design Principle	How taken into account
Section 1: General Principles	
1.1. How does the development integrate with existing paths, streets, circulation networks and patterns of activity?	
1.2. How does the development reinforce or enhance the established village or smaller settlement character of streets, greens, and other spaces?	
1.3. How does the development respect the rural character of views and gaps?	
1.4. How does the development harmonise and enhance existing settlement in terms of physical form, architecture and land use?	
1.5. Does the development relate well to local topography and landscape features, including prominent ridge lines and long-distance views?	
1.6. How does the development reflect, respect, and reinforce local architecture and historic distinctiveness	
1.7. How does the development retain and incorporate important existing features into the development	

¹⁵ Source: AECOM Oulton Design Codes and Guidelines, 2021

Design Principle	How taken into account
1.8. How does the development respect surrounding buildings in terms of scale, height, form and massing?	
1.9. How does the development adopt contextually appropriate materials and details?	
1.10. How does the development provide adequate open space for the development in terms of both quantity and quality?	
1.11. Does the development incorporate necessary services and drainage infrastructure without causing unacceptable harm to retained features;	
1.12. Are all components e.g., buildings, landscapes, access routes, parking and open space are well related to each other?	
1.13. Does the development make sufficient provision for sustainable waste management (including facilities for kerbside collection, waste separation, and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours?	
1.14. How does the development positively integrate energy efficient technologies?	
1.15. Does the proposal include water management and Sustainable Drainage Systems (SuDS) features which contribute to flood risk management and provide multiple benefits which contribute to water conservation and quality, biodiversity and recreation?	
Section 2: Street grid and layout	

Design Principle	How taken into account
2.1. Does it favour accessibility and connectivity over cul-de- sac models? If not, why?	
2.2. Do the new points of access and street layout have regard for all users of the development; in particular pedestrians, cyclists, and those with disabilities?	
2.3. What are the essential characteristics of the existing street pattern? Are these reflected in the proposal?	
2.4. How will the new design or extension integrate with the existing street arrangement?	
2.5. Are the new points of access appropriate in terms of patterns of movement?	
2.6. Do the points of access conform to the statutory technical requirements?	
Section 3: Green spaces, views and character	
3.1. What are the particular characteristics of this area which have been taken into account in the design, i.e. what are the landscape qualities of the area?	
3.2. Has the impact on the landscape quality of the area been taken into account?	
3.3. Has the proposal been considered within its wider physical context?	
3.4. How does the proposal affect the trees on or adjacent to the site?	

Design Principle	How taken into account
3.5. Does the proposal maintain or enhance any identified views or views in general?	
3.6. In rural locations, has the impact of the development on the tranquillity of the area been fully considered?	
3.7. How does the proposal affect the character of a rural location?	
3.8. How does the proposal impact on existing views which are important to the area and how are these views incorporated in the design?	
3.9. Can any new views be created?	
3.10. Is there adequate amenity space for the development?	
3.11. Does the new development respect and enhance existing amenity space?	
3.12. Have opportunities for enhancing existing amenity spaces been explored?	
3.13. Will any communal amenity spaces be created? If so, how will this be used by the new owners and how will it be managed?	
Section 4: Buildings layout and grouping	
4.1. What are the typical groupings of buildings?	
4.2. How have the existing groupings been reflected in the proposal?	
4.3. Are proposed groups of buildings offering variety and texture to the townscape?	
4.4. What effect would the proposal have on the streetscape?	

Design Principle	How taken into account
4.5. Does the proposal maintain the character of dwelling clusters stemming from the main road?	
4.6. Does the proposal overlook any adjacent properties or gardens? How is this mitigated?	
Section 5: Building line and boundary treatment	
5.1. What are the characteristics of the building line?	
5.2. How has the building line been respected in the proposals?	
5.3. Has the appropriateness of the boundary treatments been considered in the context of the site?	
Section 6: Building heights and roofline	
6.1. What are the characteristics of the roofline?	
6.2. Have the proposals paid careful attention to height, form, massing, and scale?	
6.3. If a higher-than-average building is proposed, what would be the reason for making the development higher?	
Section 7: Household extensions	
7.1. Does the proposed design respect the character of the area and the immediate neighbourhood, or does it have an adverse impact on neighbouring properties in relation to privacy, overbearing, or overshadowing impact?	
7.2. Is the roof form of the extension appropriate to the original dwelling (considering angle of pitch)?	

Design Principle	How taken into account
7.3. Do the proposed materials match those of the existing dwelling?	
7.4. In case of side extension, does it retain important gaps within the street scene and avoid a 'terracing effect'?	
7.5. Does the proposed extension respond to the existing pattern of window and door openings?	
7.6. Are there any proposed dormer roof extensions set within the roof slope?	
7.7. Is the side extension set back from the front of the house?	
7.8. Have the details of the windows, doors, eaves, and roof been addressed in the context of the overall design?	
7.9. Do the new proposed materials respect or enhance the existing area or adversely change its character?	
Section 8: Car parking solutions	
8.1. What parking solutions have been considered?	
8.2. Are the car spaces located and arranged in a way that is not dominant or detrimental to the sense of place?	
8.3. Has planting been considered to soften the presence of cars?	
8.4. Does the proposed car parking compromise the amenity of adjoining properties?	
8.5. Have the needs of wheelchair users been considered?	
Section 9: Architectural details and contemporary design	

Design Principle	How taken into account
8.6. Does the proposal harmonise with the adjacent properties? This means that it follows the height, massing, and general proportions of adjacent buildings and how it takes cues from materials and other physical characteristics.	
8.7. Does the proposal maintain or enhance the existing landscape features?	
8.8. Has the local architectural character and precedent been demonstrated in the proposals?	
8.9. If the proposal is a contemporary design, are the details and materials of a sufficiently high enough quality and does it relate specifically to the architectural characteristics and scale of the site?	

Appendix C: Maps of Local Green Spaces

OULTON NEIGHBOURHOOD PLAN

JENKINS GREEN & POND

LOCAL GREEN SPACE



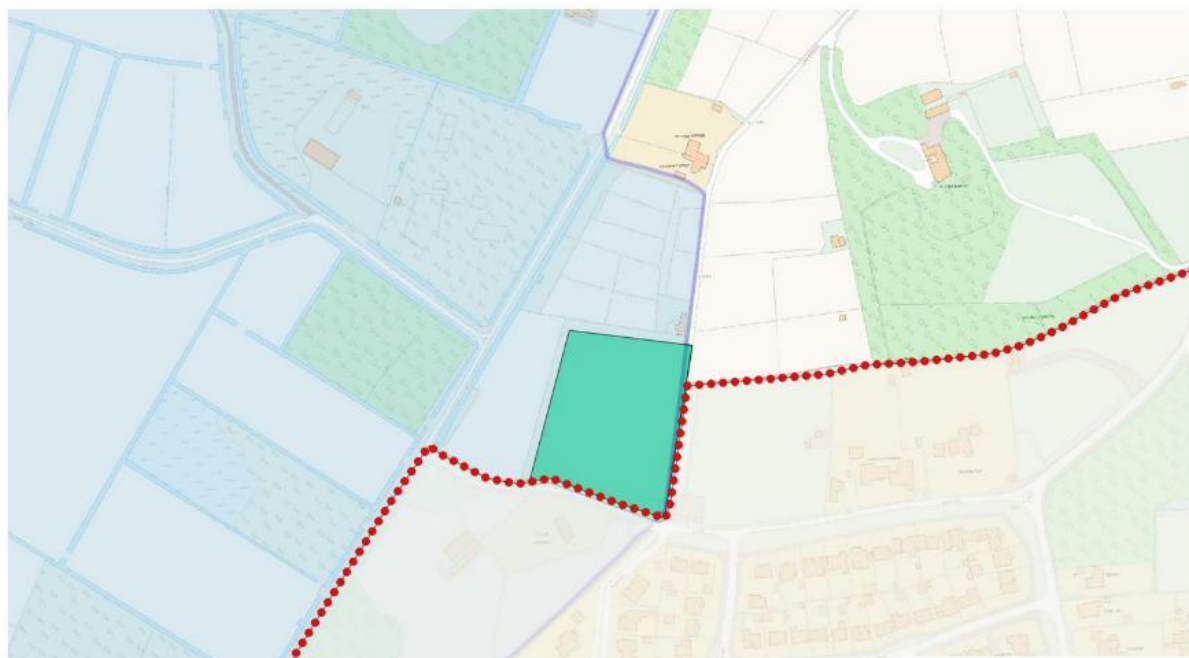
0 25 50 m
Scale 1:750 at A4
Contains OS data © Crown copyright and database right (2022) 100058074
Source: Ordnance Survey

N
Key
Local Green Space
Neighbourhood Area Boundary

OULTON NEIGHBOURHOOD PLAN

ST MICHAELS CHURCH & GRAVEYARD

LOCAL GREEN SPACE



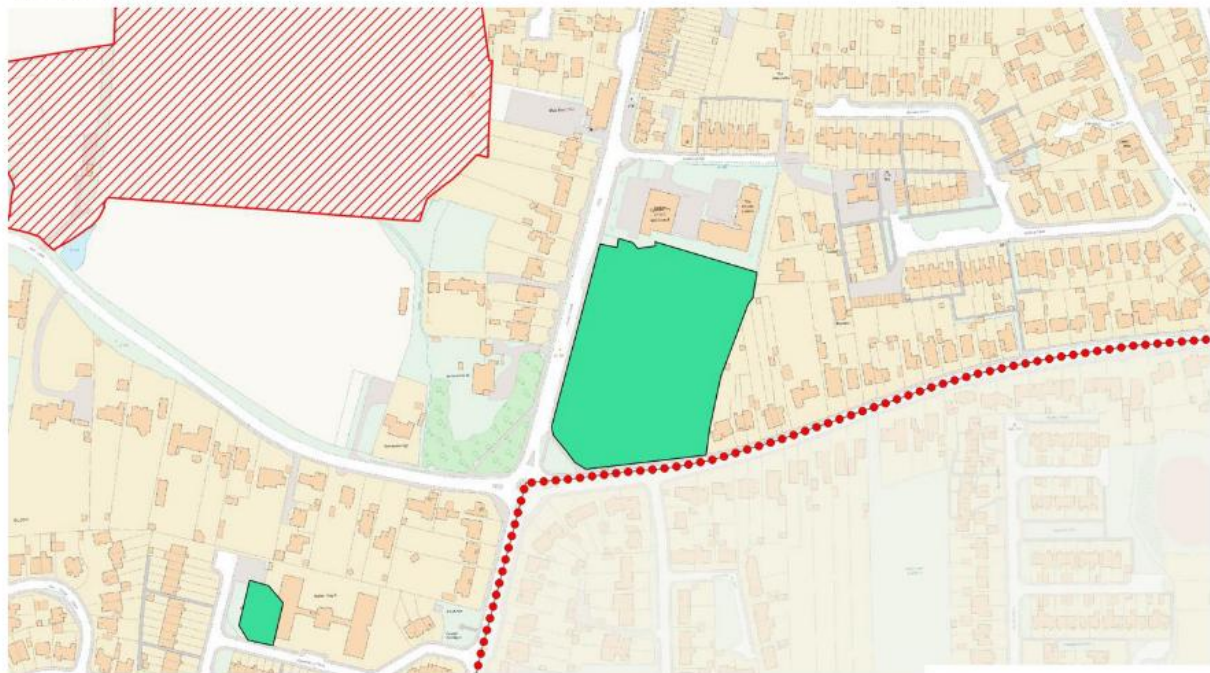
0 50 100 m
Scale 1:2,500 at A4
Contains OS data © Crown copyright and database right (2022) 100058074
Sources: Ordnance Survey & Natural England

N
Key
Local Green Space
Broads Authority Executive Area
Neighbourhood Area Boundary

OULTON NEIGHBOURHOOD PLAN

COMMUNITY CENTRE PLAYING FIELD

LOCAL GREEN SPACE



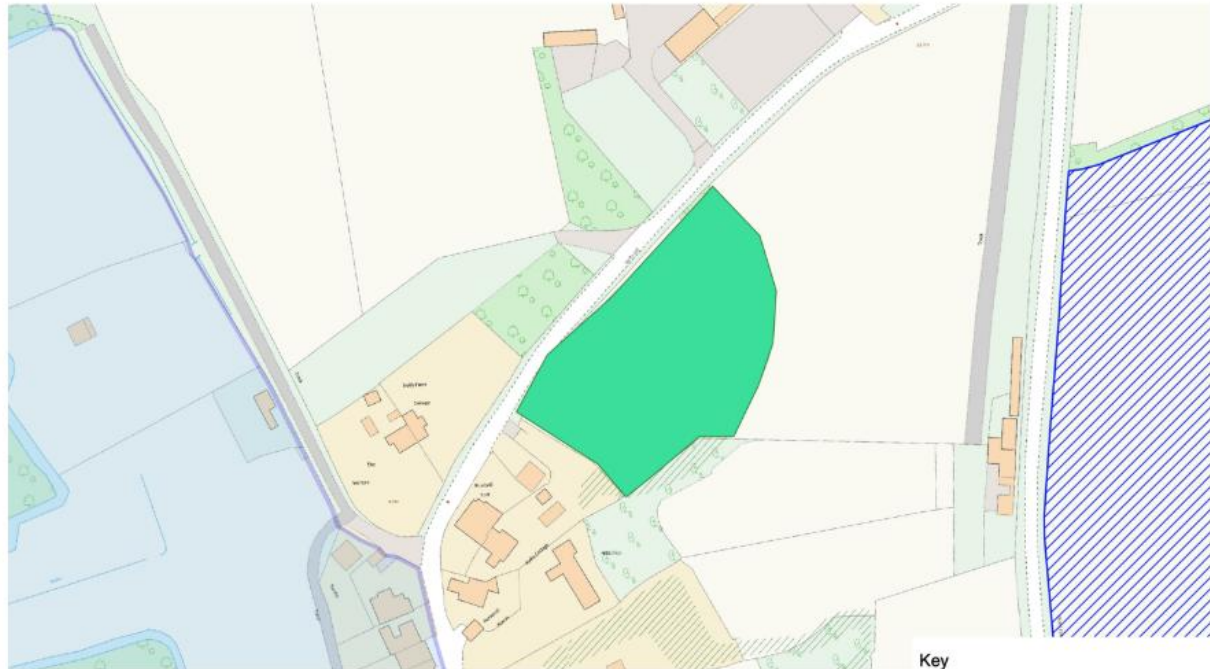
0 50 100 m
Scale 1:2,500 at A4
Contains OS data © Crown copyright and database right (2022) 100058074
Source: Ordnance Survey

Key
 Local Green Space
 Allocated Site
 Neighbourhood Area Boundary

OULTON NEIGHBOURHOOD PLAN

CAMPS HEATH GREENSPACE

LOCAL GREEN SPACE

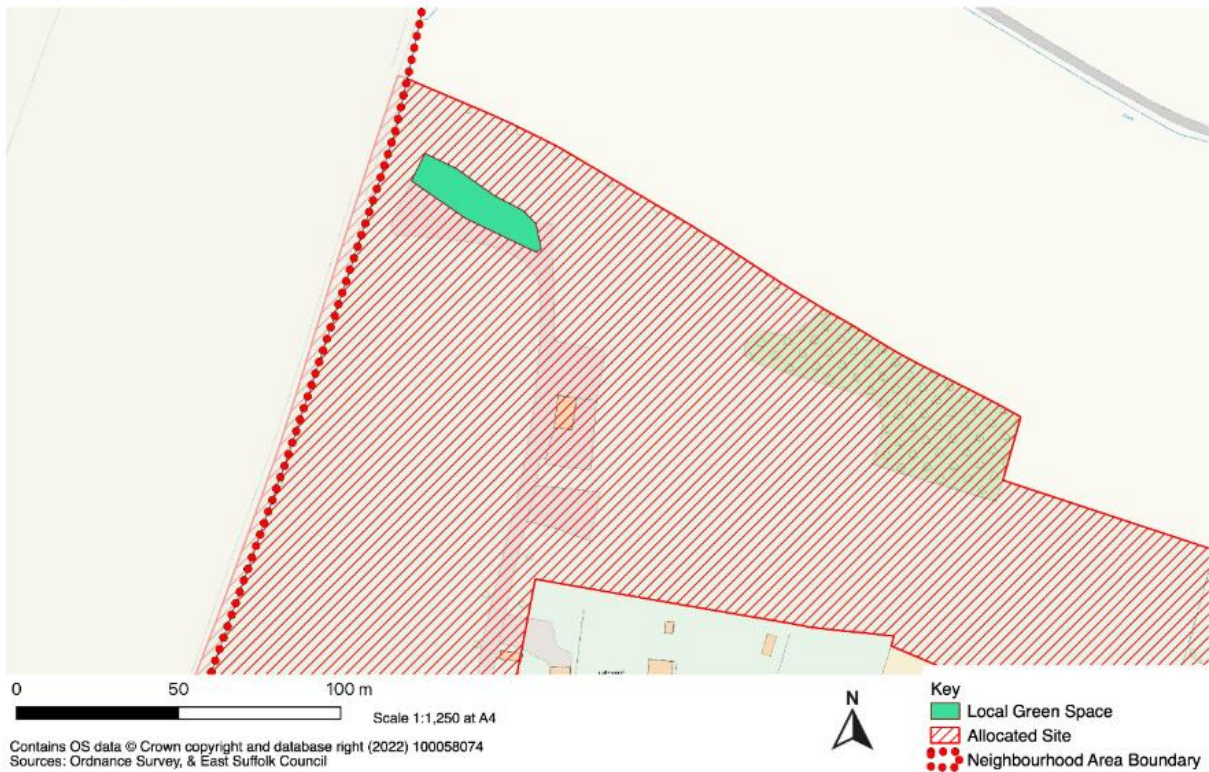


0 50 100 m
Scale 1:1,250 at A4
Contains OS data © Crown copyright and database right (2022) 100058074
Sources: Ordnance Survey, Natural England & East Suffolk Council

Key
 Local Green Space
 Broads Authority Executive Area
 Planning Permission for Housing
 Neighbourhood Area Boundary

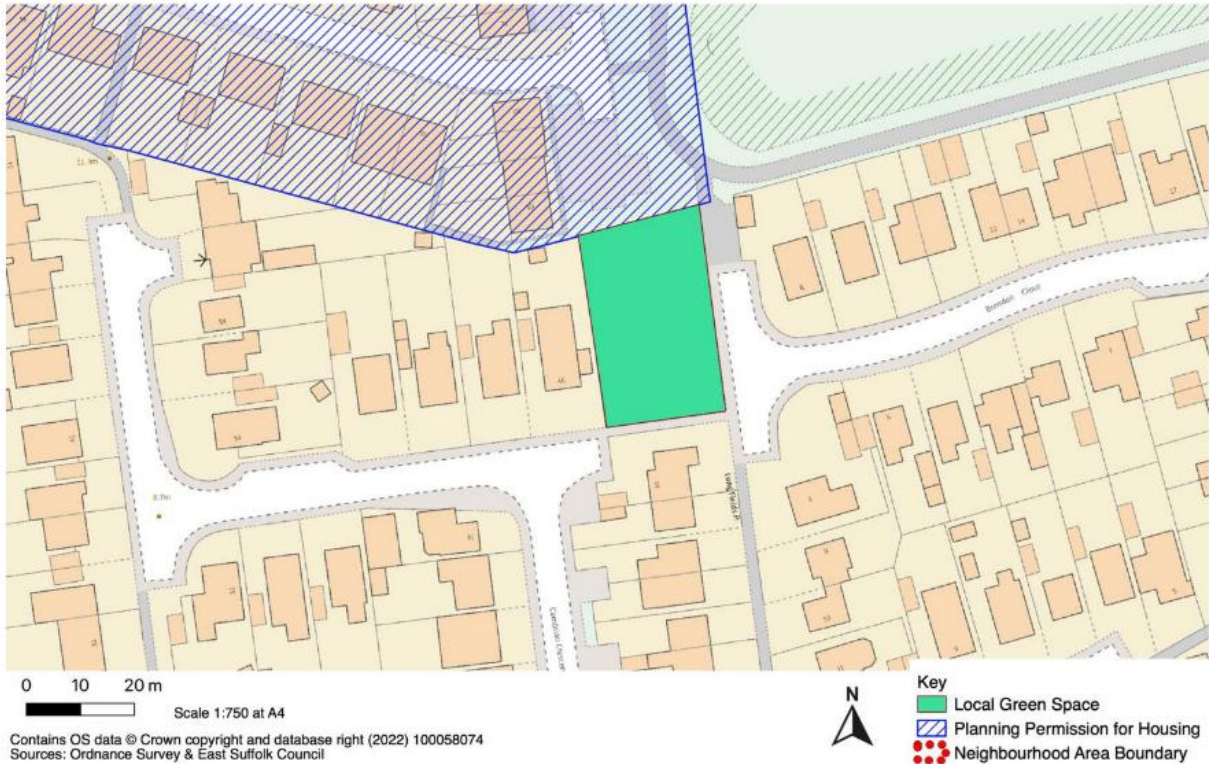
OULTON NEIGHBOURHOOD PLAN
LOCAL GREEN SPACE

BURIAL GROUND NEAR UNION LANE



OULTON NEIGHBOURHOOD PLAN
LOCAL GREEN SPACE

BRENDON WAY PLAY AREA



OULTON NEIGHBOURHOOD PLAN
LOCAL GREEN SPACE

BLOOMSBURY CLOSE PLAY AREA



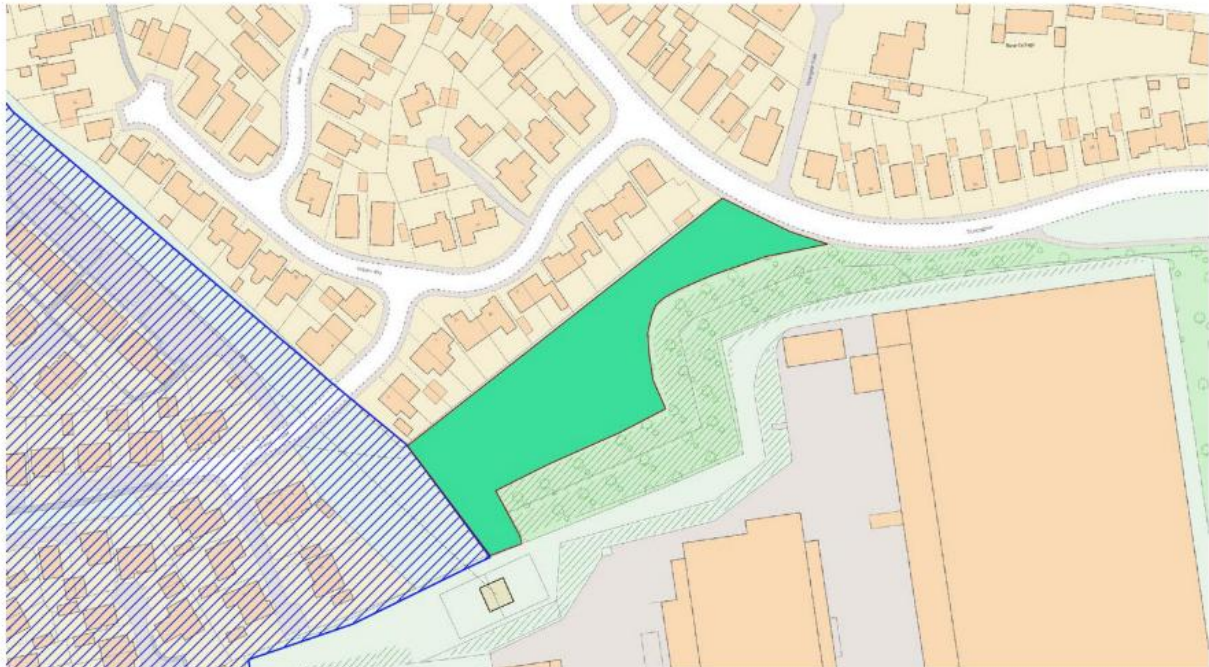
0 10 20 m
 Scale 1:750 at A4
 Contains OS data © Crown copyright and database right (2022) 100058074
 Sources: Ordnance Survey



Key
 Local Green Space

OULTON NEIGHBOURHOOD PLAN
LOCAL GREEN SPACE

DUNSTON DRIVE PLAY AREA



0 25 50 m
 Scale 1:1,250 at A4
 Contains OS data © Crown copyright and database right (2022) 100058074
 Sources: Ordnance Survey & East Suffolk Council

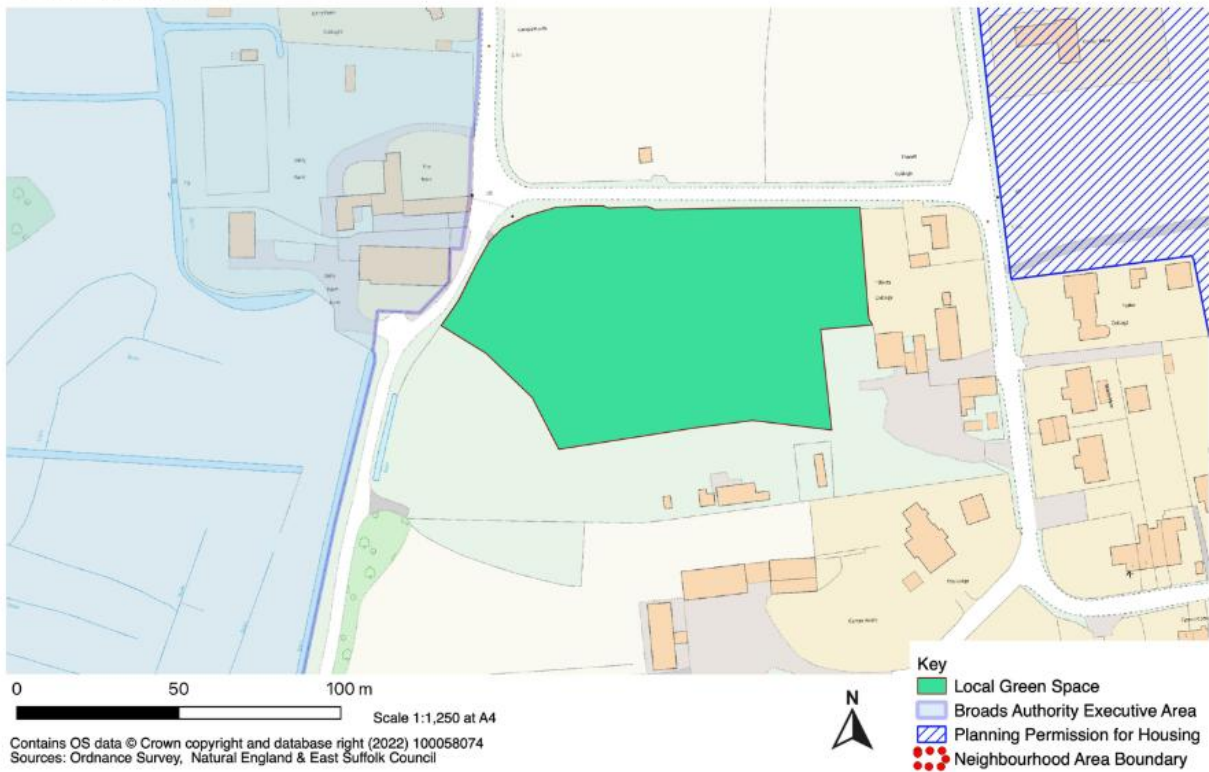


Key
 Local Green Space
 Planning Permission for Housing

OULTON NEIGHBOURHOOD PLAN

BOWLING GREEN CAMPS HEATH

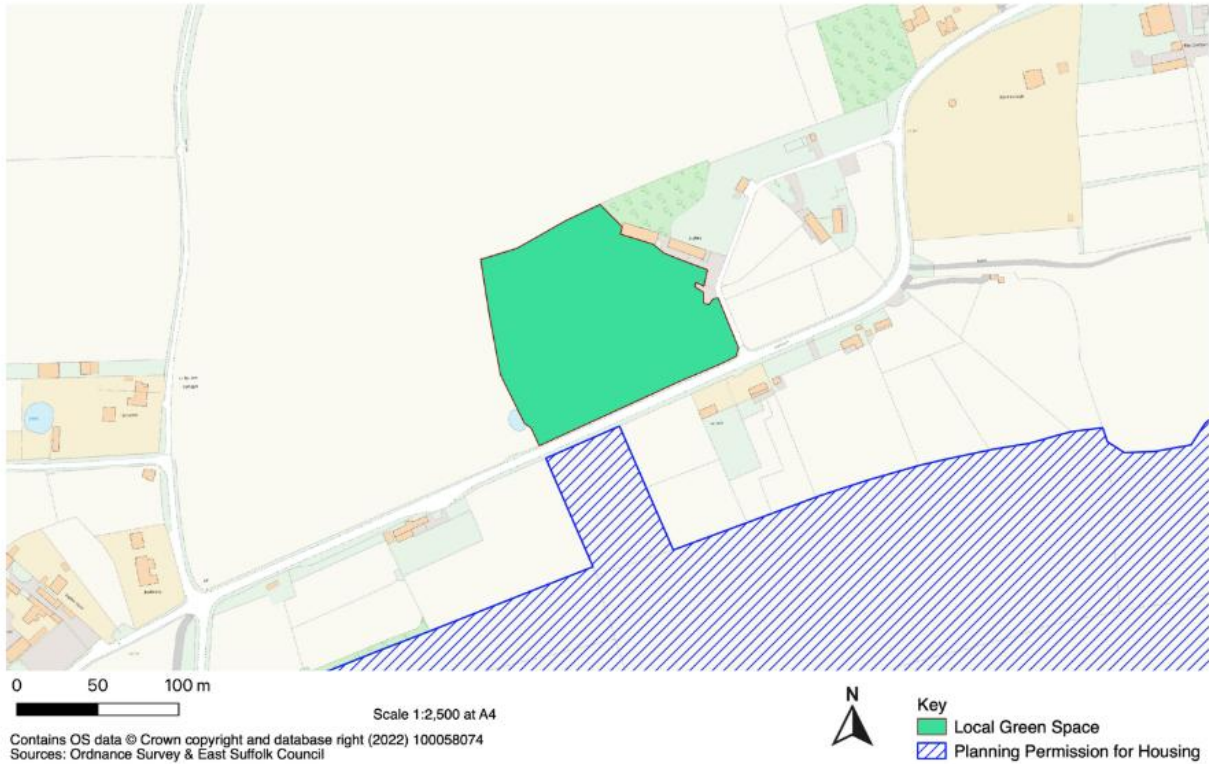
LOCAL GREEN SPACE



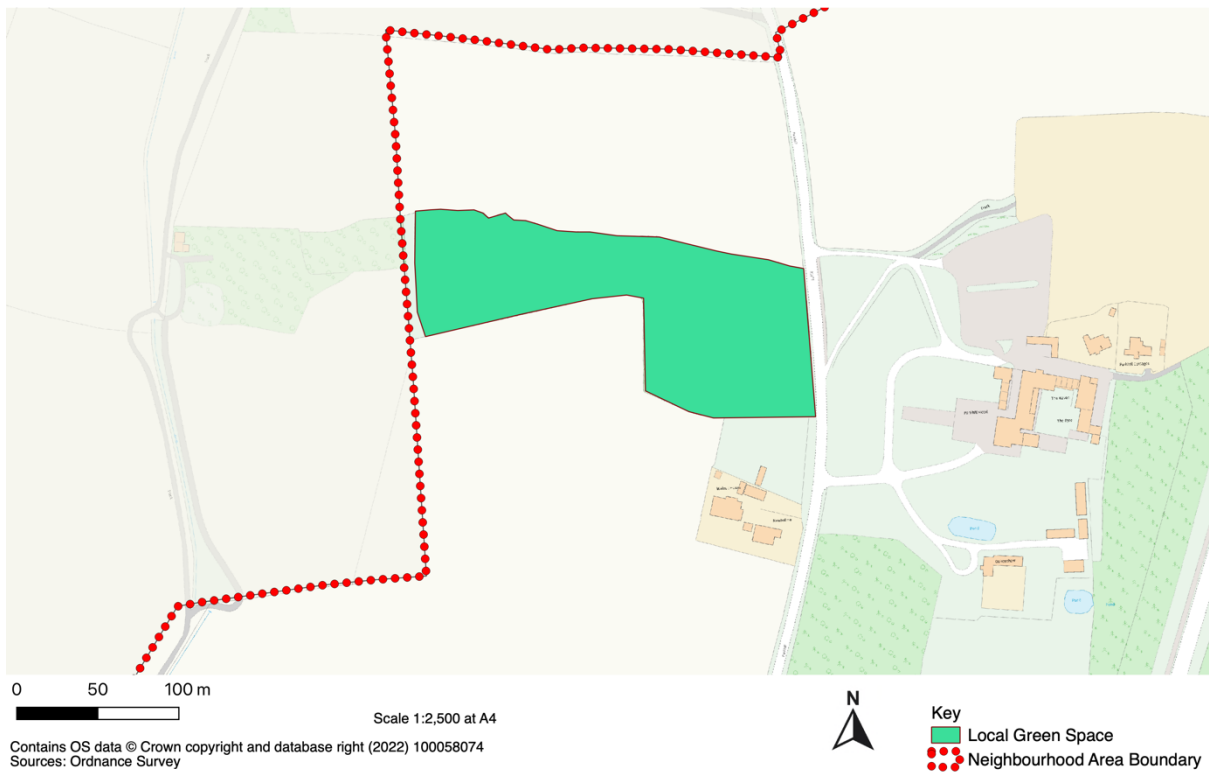
OULTON NEIGHBOURHOOD PLAN

FOOTBALL PITCH CAMPS HEATH

LOCAL GREEN SPACE



LOCAL GREEN SPACE



Appendix D: Justification for Local Green Space Policy Wording

Background

The Local Green Space (LGS) policy is important, as is the precise wording. Paragraph 103 of the National Planning Policy Framework sets out that, *“Policies for managing development within a Local Green Space should be consistent with those for Green Belts.”*

This at least implies that LGS designations require a policy for managing development, rather than just a list of those designations. This seems likely as:

- First, it refers to LGS ‘policy’ for managing development. Policy should set out how decisions should be made when determining a planning application. A list of LGSs does not do this as it does not guide the decision maker, simply informing them of which sites are LGSs.
- Second, Para 103 implies that LGS policy is a separate entity to national green belt policy.
- Third, development affecting a LGS cannot be determined using green belt policy; green belt policy applies only to green belt, not to LGSs. An attempt to use green belt policy is likely to be unlawful and challengeable.

Regarding *Lochailort Investments Limited v. Mendip District Council and Norton St Philip Parish Council*, [2020] EWCA Civ 1259, this found that LGS policy need to be consistent with Green Belt policy and that any departure needs to be explained in a reasoned way. According to that judgement, *“The ordinary meaning of “consistent” is “agreeing or according in substance or form; congruous, compatible”. What this means, in my judgment, is that national planning policy provides that policies for managing land within an LGS should be substantially the same as policies for managing development within the Green Belt.”*

The neighbourhood plan needs to have ‘due regard’ to this requirement. ‘Due regard’ does not mean LGS policy has to conform to the requirement in every respect, but any departure will nevertheless need to be fully justified and explained. The judgements support this, explaining that *“provided the departure from the NPPF is explained, there may be divergence between LGS policies in a neighbourhood plan and national Green Belt policy.”*

Requirements of Green Belt Policy

It is therefore necessary to assess Green Belt policy in the National Planning Policy Framework (NPPF) to identify its features and requirements.

National Green Belt policy at para 148 of the NPPF explains that openness and permanence are essential characteristics of Green Belt and that it why it is designated - to preserve its openness and permanence. This is the purpose. The designation of LGS aims to protect smaller parcels of land for a variety of purposes that are in addition to their openness, such as its ecology, recreational value or history as set out as examples in the national framework. These must (NPPF para. 101) be capable of enduring beyond the plan period; this is a lower bar than needing to be permanent. It can endure beyond the plan period as long as there is

not undue pressure for needed housing on those parcels of land, either by virtue of allocations for meeting local housing need being provided in the neighbourhood plan, or there being other land available to meet any unmet need. Another threat to the capability to endure would be a long list of different types of development that could be appropriate or acceptable.

The judgement in the case of *R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council* [2020] UKSC 3, found that openness is not just a spatial or volumetric concept, but a visual one such that visual impact is a key matter. This is likely to be a particular matter of relevance for LGSs given that they tend to be small and so any development will have a visual impact.

The NPPF sets out that local planning authorities should plan positively to enhance their beneficial use. Green Belt policy sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It goes on to say that ‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

New buildings are inappropriate development in Green Belt. There are some exceptions to this. Green Belt policy sets out a list of development that is not inappropriate, such as in-fill in villages, and affordable housing. Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes mineral extraction and local transport infrastructure. These examples might still not be permitted if they would result in harm as para 148 says, *“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt.”*

There are many exceptions listed at paras. 149 and 150 of the NPPF. As Green Belt areas are large, it is plausible that many such developments could take place within the Green Belt without undermining its overall openness and permanence or resulting in only minor harm. This is not the case for LGSs, which cannot be extensive tracts of land. This means that even small-scale development risks undermining the purpose of designation and having an immediate and harmful visual impact. LGS policy that simply refers to the list of Green Belt exceptions in the NPPF could undermine the designation process as this large number of exceptions would suggest that the designation is not capable of enduring beyond the plan period. LGS policy therefore needs to consider each in turn, and with the aim of limiting the number.

Justification for LGS Policy 5

The table below reviews each element of the Oulton LGS policy and provides justification for the diversion from Green Belt policy. In particular, the table justifies diversion from Green Belt policy with respect to what is considered an exception to inappropriate development, for example infill or minerals extraction.

LGS Policy	Justification for deviation from Green Belt Policy
<p>New buildings are inappropriate development with the only exceptions to this:</p> <ul style="list-style-type: none"> a) Buildings for forestry or agriculture where the Local Green Space is used for commercial woodland or farmland. b) The provision of appropriate facilities in connection with the existing use of land where the facilities preserve the openness of the Local Green Space and do not conflict with the reasons for designation that make it special to the community, such as for recreation or ecology. c) The extension or alteration of a building if it does not impact on the openness or the reasons for designation that make the Local Green Space special to the community; or d) The replacement of a building provided the new building is in the same use and not materially larger than the one it replaces. 	<p>Para 149 (of the NPPF) sets out that the construction of new buildings is inappropriate apart from identified exceptions (listed a-g below). A number of these exceptions could undermine the openness of LGS or impact upon their reasons for designation -</p> <ul style="list-style-type: none"> a) Buildings for agriculture or forestry; this is a reasonable exception for LGS policy where land is commercial woodland or farmland as it may otherwise hinder someone's business. b) Provision of appropriate facilities; this is a reasonable exception for LGS if such development could support the ongoing use and help to make the LGS capable of enduring. c) Extension or alteration of a building provided it does not result in disproportionate additions over and above the size of the original building; this is a reasonable exception for LGS where it does not impact upon its openness or reasons for designation; d) Replacement of a building, provided it is the same use and not materially larger; this is a reasonable exception for LGS; e) Limited infill in villages; This is not a reasonable exception for LGS. Openness is not just a spatial concept, it is also visual, as determined by the Supreme Court. Any infill on small LGS designations will seriously undermine their openness and their reasons for designation. f) Limited affordable housing for local community needs; This is not a reasonable exception for LGS. Any affordable housing on small LGS designations will seriously undermine their openness and their reasons for designation. g) Limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use; this is not a reasonable exception for LGS. It

LGS Policy	Justification for deviation from Green Belt Policy
	is unlikely that LGS will be brownfield when identified in accordance with Para 101, and infilling and complete redevelopment is likely to fully undermine the designation of the LGS.
<p>Other appropriate development includes:</p> <ul style="list-style-type: none"> a) Engineering operations that are temporary, small-scale and result in full restoration; or b) The re-use of buildings provided that the buildings are of permanent and substantial construction; or c) Material changes in the use of land where it would not undermine the reasons for designation that make it special to the community. 	<p>Para 150 sets out that certain other forms of development are also not inappropriate provided they preserve the openness of Green Belt and do not conflict with the purpose (listed a-f). A number of these exceptions could undermine the openness of LGS or impact upon their reasons for designation -</p> <ul style="list-style-type: none"> a) Mineral extraction; This is not a reasonable exception. Though highly unlikely to apply in any LGS, but nevertheless the quarry would be so large and the operations so long term that it would not enable the LGS to endure beyond the plan period. b) Engineering operations; This is a reasonable exception. LGS policy could allow for this if temporary, small-scale and restored fully c) Local transport infrastructure; This is not applicable as it specifically requires a Green Belt location d) Re-use of buildings; This is a reasonable exception. e) Material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); This is a reasonable exception. LGSs are designated for reasons related to their specific use or quality, such as recreation or ecology. Change of use could be supported in LGS policy as long as the new use would not undermine the reason for designation that makes it special to the community. f) Development, including buildings, brought forward under Community Right to Buy or Neighborhood Development Order; this would not apply as the community is designating the land as LGS so as to keep it open and protect its special qualities.
Proposals that are on land adjacent to Local Green Space are required to set out how any impacts on the special qualities of the green space, as identified by its reason for designation, will be mitigated.	There is no requirement in Green Belt policy that relates to adjacent land. However, the setting of LGS or adjacent land use may be part of or impact upon what makes it demonstrably special, particularly where LGS are very small.

